

# CABINET

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Tuesday, 2 February 2016 at 5.30 p.m.

C1, 1st Floor, Town Hall, Mulberry Place, 5 Clove Crescent, London,  
E14 2BG

## SUPPLEMENTAL AGENDA

Appendices Pack (Licensing of Private Sector Housing, Late Night  
Levy and School Admission Arrangements reports)

The meeting is open to the public to attend.

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For further information including the Membership of this body and public information,  
see the main agenda.

		<b>PAGE NUMBER(S)</b>	<b>WARD(S) AFFECTED</b>
<b>5 .4</b>	<b>Licensing of the Private Rented Housing Sector</b>	<b>1 - 160</b>	<b>All Wards</b>
<b>5 .5</b>	<b>Consultation of the late night levy for licensed premises</b>	<b>161 - 202</b>	<b>All Wards</b>
<b>5 .8</b>	<b>Determination of School Admission Arrangements for 2017/18</b>	<b>203 - 360</b>	<b>All Wards</b>

## **APPENDICES**

### **5.4 - Licensing of the Private Rented Housing Sector**

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Appendix One Pre 2014 wards as % of Borough area against % of PRS Total

Pre 2014 Ward	% of Borough's area	2011 census for private rented properties	% of private rented properties in per 2014 ward against Borough total of PRS (34,216)
Blackwall and Cubbit Town	11.35	3697	10.8
Bow East	9.43	2062	6.03
Bow West	6.81	1399	4.09
Millwall	9.92	5370	15.69
Spitalfields and Banglatown	3.23	1604	4.69
Weavers	3.94	1741	5.09
Whitechapel	4.64	2578	7.53

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## **Appendix Two**

### **Evidence Base for designating pilot areas for licensing the private rented housing sector within the London Borough of Tower Hamlets.**

#### **1 Introduction**

1.1 The Consumer and Business Regulations Service have looked at the following evidence in order for licensing of the private rented housing sector in the Borough to be considered.

- The growth of Private Rented Sector (PRS) in the Borough
- The levels of Anti-Social Behaviour (ASB) to the Police and Council
- The amount of fly tipped material collected

#### **2 The Growth of PRS in the Borough**

##### *House Prices and Rental costs*

2.1 Information provided by the Corporate Research Unit states that the average house price paid in April 2013 was £370,500, which was below the London average of £377,800. House prices as in the rest of London and the southeast have been increasing steadily over the past months, which makes the housing market in Tower Hamlets a prime site for investment with 'buy to let' properties.

2.2 On average, over 2013, 300 properties were sold every month in the Borough.

2.3 The median rental market price for private properties in Tower Hamlets was higher than the London median price. Rents are higher for Studios, 49% and 1 and 3 bedroom properties, 27% and 30% respectively compared to the rest of London.

2.4 In 2013, the average private rent increase was 16.7% compared to a London average increase of 8.9%

2.5 In 2012/13, median private rental prices for 2 and 3 bedroom properties were £1,647 and £1,950 respectively. A 1 bedroom property had a median price of £1,399 while a Studio was £1,233. A single room had a medium rental price of £542 a month.

2.6 Tower Hamlets remains a desirable place to invest in for buy to let properties as the return on the investment is growing faster than the rest of London.

##### *Household type per Ward*

- 2.7 The 2011 census took place on the 23<sup>rd</sup> March 2011, data has been extrapolated by the Corporate Research Unit to enable household type to be matched against tenure. The census data demonstrates that the Borough is the fastest growing local authority in the country with an increase of 26% in population between 2001 and 2011.
- 2.8 The average population ward size in Tower Hamlets is twice the national average. Millwall is the largest ward and Spitalfields and Banglatown is the smallest ward.
- 2.9 Tower Hamlets has an average household size of 2.5, with Mile End East having the largest household size of 2.85 and St Katherine's and Wapping the smallest with 2.07.
- 2.10 The following table shows the 2011 census as a breakdown for tenure within each Ward.

*Table One: Tenure within each ward (percentages rounded)*

Ward	Percentage Owned	Percentage Private Rented	Percentage Social Rented
Bethnal Green North	23	31	46
Bethnal Green South	22	33	45
Blackwall and Cubitt Town	29	43	29
Bow East	26	31	43
Bow West	33	28	39
Bromley by Bow	19	26	56
East India and Lansbury	21	21	57
Limehouse	28	31	41
Mile End East	19	28	53
Mile End and Globe Town	27	27	46
Millwall	30	50	21
Shadwell	27	30	43
Spitalfields and Banglatown	27	41	32
St Dunstons and Stepney Green	25	21	54
St Katherine's and Wapping	42	38	20
Weavers	25	31	43
Whitechapel	23	44	33



2.11 The 2011 census also provided data on the percentage and type of house hold within each ward.

*Table Two: Percentage and type of household within each ward*

Ward	Household with dependent children	Household with no dependent children	Single Adult household	One Family household	Other household types
Bethnal Green North	25	75	34.1	20.4	20.6
Bethnal Green South	27.7	72.3	36	17.9	18.4
Blackwall and Cubitt Town	23.8	76.2	35.1	24.9	16.2
Bow East	22.6	77.4	35.1	24.5	17.8
Bow West	26.9	73.1	30.5	23.7	19
Bromley by Bow	38.4	61.6	30.2	17.9	13.5
East India and Lansbury	39.5	60.5	31.3	18.8	10.3
Limehouse	30.8	69.2	32.9	21.6	14.7
Mile End East	34.7	65.3	29.5	17.4	18.3
Mile End and Globe Town	27.9	72.1	32.4	19.5	20.2
Millwall	20.3	79.7	38.3	27.1	14.2
Shadwell	29.7	70.3	34.4	21.6	14.4
Spitalfields and Banglatown	19.5	80.5	37.6	20.6	22.3
St Dunstans and Stepney Green	33.3	66.7	33.4	19.6	13.7
St Katherine's and Wapping	16.8	83.2	42.4	25.8	15
Weavers	22	78	35.8	29.4	21.9
Whitechapel	22	78	34.4	18.7	24.9

2.12 The above data demonstrates that the private rented sector is stronger in Millwall, Blackwall and Cubitt Town, Whitechapel and Spitalfields and Banglatown Wards and the majority of households that do not

have dependent children are within St Katherine's and Wapping, Spitalfields and Banglatown, Whitechapel, Weavers and Millwall Wards.

- 2.13 The data held by the change of name of the Council Tax demand, gives an indication of the amount of 'churn' of residents moving property or moving into the area. It is normal practice for the tenant to be responsible for paying the Council Tax and therefore they need to register their details with the Council. The following table demonstrates the 'churn' in Council Tax payers within a ward. This data is from 1<sup>st</sup> April 2011 until 31<sup>st</sup> January 2014.

*Table three: Council Tax 'churn' per ward (1/4/11 to 31/1/14)*

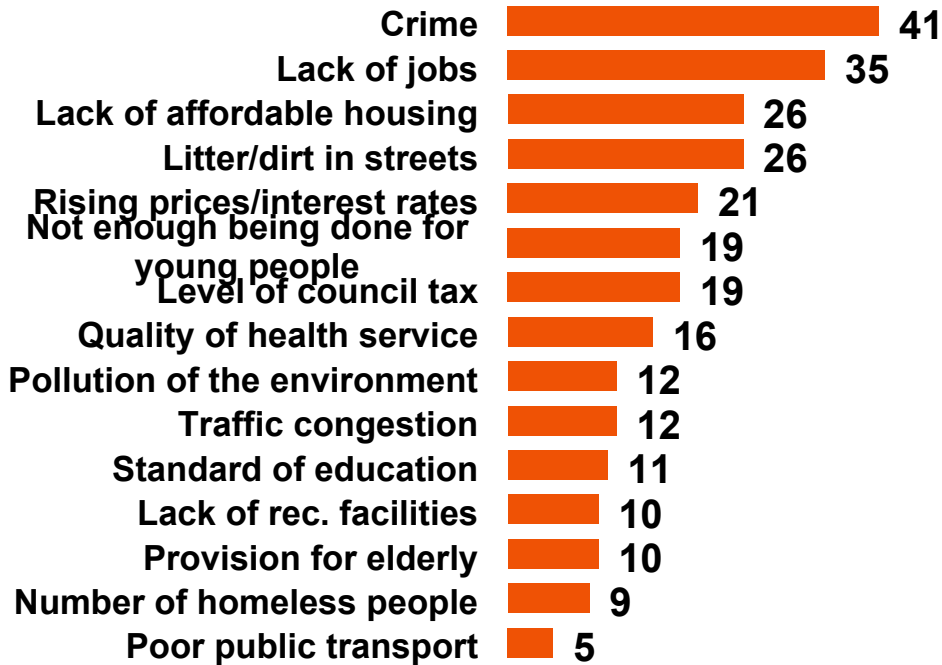
	Number of Changes per property									
	2	3	4	5	6	7	8	9	10	11
Bromley by Bow	915	357	142	40	7					
Blackwall and Cubitt Town	1982	1010	466	104	18	4				
Bethnal Green North	844	337	128	26	13	3			1	
Bethnal Green South	857	512	206	49	18	1	1	1		
Bow East	1283	625	218	41	7	4				
Bow West	862	361	141	43	4	2				
East India and Lansbury	890	308	87	25	4	1				
Limehouse	1180	484	187	23	11					
Mile End East	745	399	134	32	7	4				
Mile End and Globe Town	805	365	136	43	12	3	2			
Millwall	2295	1257	491	143	33	9	3	1		1
St. Dunstons and Stepney Green	863	314	124	42	7	2				
Shadwell	1100	445	170	35	4	1				
St. Katherine's and Wapping	1214	525	163	30	6	2				
Spitalfields and Banglatown	712	443	229	52	19					
Whitechapel	1172	693	337	75	11	1				
Weavers	856	467	167	53	7	1				

### **3 The levels of ASB and crime reported to the Police and Council**

- 3.1 ASB can ruin lives and make areas feel unsafe for communities. The Council takes ASB seriously and has employed Teams of Tower Hamlets Enforcement Officers to deal with street ASB and works with the social landlords to control ASB on estates. The Council is instrumental in bringing partners together under the umbrella of the Community Safety Partnership. In addition the Council funds a number of Police Officers to ensure that certain work streams that revolve around ASB and adequately resourced.
- 3.2 During the Annual Residents Survey 2012/13 1192 interviews were undertaken at 105 sampling points to individuals over 18 years of age.

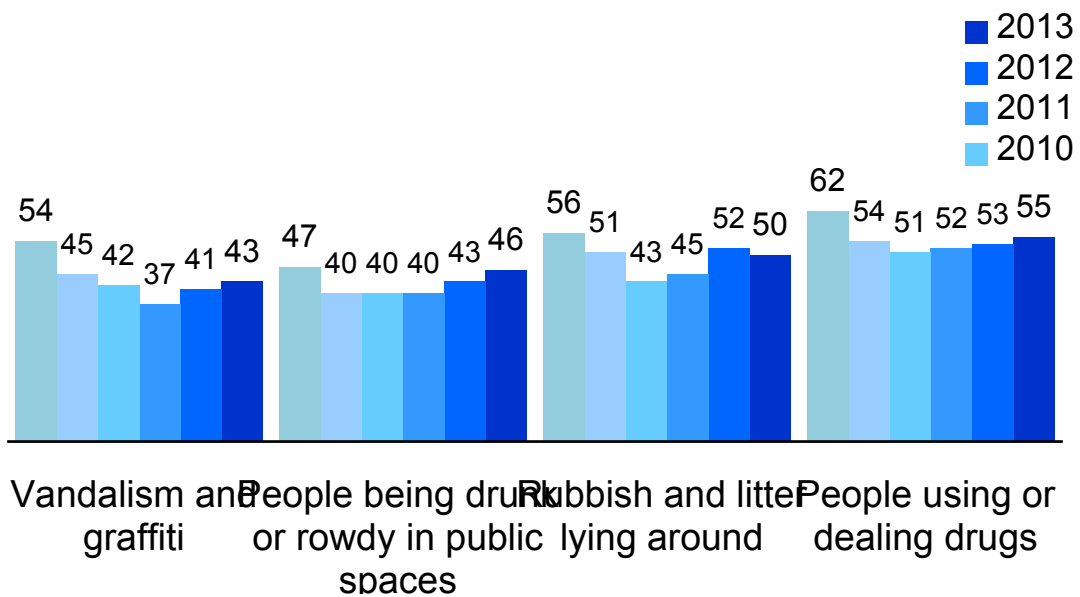
The main concerns highlighted by residents are detailed in the chart below.

*Table Four: Annual Residents Survey 12/13 – resident’s personal concerns*



3.3 Within the Annual Residents Survey, residents were asked about what they thought of their local area in relation to ASB. The following results were obtained.

*Table Five: ASB related concerns – problems in the local area*



ASB within the street environment

3.4 The Councils ASB data has been reviewed for complaints of ASB on the street, the tables below 2012/13 and 2013/14 (end October) are linked to ward areas. The data for 2013/14 shows a lot more ASB in the street indicating that ASB is more likely to occur on the streets during the summer months.

3.5 In compiling the data the location field shows that if the incident occurred in a residence or in the street. The types of complaints that have been received in this category are detailed below.

- Drinking in public/communal areas
- Noise from neighbours
- Door Knocking/Banging
- Smoking on stairwells
- Urinating on communal lift
- Loitering in area
- Dropping litter
- Loud music

Table Six: ASB complaints from residential property v street environment 2012/13

2012/2013					
Ward	Residential	Street	% Residential	% Street	Total
BBB Bromley by Bow	45	29	61%	39%	74
BCT Blackwall and Cubitt Town	71	98	42%	58%	169
BGN Bethnal Green North	88	52	63%	37%	140
BGS Bethnal Green South	140	108	56%	44%	248
BWE Bow East	85	39	69%	31%	124
BWW Bow West	79	42	65%	35%	121
EIL East India and Lansbury	61	28	69%	31%	89
LMH Limehouse	149	81	65%	35%	230
MEE Mile End East	39	37	51%	49%	76
MGT Mile End and Globe Town	113	64	64%	36%	177
MLW Millwall	56	39	59%	41%	95
SDS St. Dunstons and Stepney Green	109	78	58%	42%	187
SHD Shadwell	87	57	60%	40%	144
SKW St. Katherine's and Wapping	84	44	66%	34%	128
SPB Spitalfields and Banglatown	100	86	54%	46%	186
WHI Whitechapel	161	104	61%	39%	265
WVR Weavers	174	124	58%	42%	298
<b>Total</b>	<b>1641</b>	<b>1110</b>	<b>60%</b>	<b>40%</b>	<b>2751</b>

*Table Seven: ASB complaints from residential property v street environment  
2013/14 (end October)*

2013/2014					
Ward	Residential	Street	% Residential	% Street	Total
BBB Bromley by Bow	24	31	44%	56%	55
BCT Blackwall and Cubitt Town	40	114	26%	74%	154
BGN Bethnal Green North	84	55	60%	40%	139
BGS Bethnal Green South	59	88	40%	60%	147
BWE Bow East	47	33	59%	41%	80
BWW Bow West	58	57	50%	50%	115
EIL East India and Lansbury	29	32	48%	52%	61
LMH Limehouse	100	76	57%	43%	176
MEE Mile End East	36	29	55%	45%	65
MGT Mile End and Globe Town	113	63	64%	36%	176
MLW Millwall	32	46	41%	59%	78
SDS St. Dunstons and Stepney Green	58	67	46%	54%	125
SHD Shadwell	47	44	52%	48%	91
SKW St. Katherine's and Wapping	50	36	58%	42%	86
SPB Spitalfields and Banglatown	63	86	42%	58%	149
WHI Whitechapel	106	110	49%	51%	216
WVR Weavers	118	74	61%	39%	192
<b>Total</b>	<b>1064</b>	<b>1041</b>	<b>51%</b>	<b>49%</b>	<b>2105</b>

3.6 The data demonstrates that there is an approximate 60% to 40% split of residential to street environment ASB complaints over the recoding period, with Weavers and Whitechapel having the most complaints.

3.7 When examining the noise data, complaints have been recorded in relation to residential, commercial and street. It is the residential and street noise which of interest in relation to the PRS sector. The complaints recorded re from 2012/13 and 2013/14 (end October). Around 76% of the complaints can be attributed to residences with 7% on the street.

*Table Eight: 2012/13 Noise complaints by location*

2012/2013					
Ward	Commercial	Residential	Street	TOTAL	% Residential
BBB Bromley by Bow	13	239	12	264	91%
BCT Blackwall and Cubitt Town	47	193	23	263	73%
BGN Bethnal Green North	52	321	17	390	82%
BGS Bethnal Green South	25	259	17	301	86%
BWE Bow East	39	251	25	315	80%
BWW Bow West	51	245	15	311	79%

EIL East India and Lansbury	32	183	14	229	80%
LMH Limehouse	36	234	25	295	79%
MEE Mile End East	29	203	19	251	81%
MGT Mile End and Globe Town	27	196	13	236	83%
MLW Millwall	74	178	26	278	64%
SDS St. Dunstons and Stepney Green	38	200	18	256	78%
SHD Shadwell	38	222	13	273	81%
SKW St. Katherine's and Wapping	36	178	25	239	74%
SPB Spitalfields and Banglatown	99	242	30	371	65%
WHI Whitechapel	79	293	26	398	74%
WVR Weavers	80	401	47	528	76%
<b>TOTAL</b>	<b>795</b>	<b>4038</b>	<b>365</b>	<b>5198</b>	<b>78%</b>

*Table Nine: 201/14 (end October) Noise complaints by location*

<b>2013/2014</b>					
<b>Ward</b>	<b>Commercial</b>	<b>Residential</b>	<b>Street</b>	<b>TOTAL</b>	<b>% Residential</b>
BBB Bromley by Bow	10	154	5	169	91%
BCT Blackwall and Cubitt Town	46	103	9	158	65%
BGN Bethnal Green North	47	227	17	291	78%
BGS Bethnal Green South	34	148	16	198	75%
BWE Bow East	141	152	28	321	47%
BWW Bow West	31	161	20	212	76%
EIL East India and Lansbury	42	126	8	176	72%
LMH Limehouse	42	248	23	313	79%
MEE Mile End East	33	121	10	164	74%
MGT Mile End and Globe Town	19	183	11	213	86%
MLW Millwall	75	144	14	233	62%
SDS St. Dunstons and Stepney Green	27	130	13	170	76%
SHD Shadwell	25	143	2	170	84%
SKW St. Katherine's and Wapping	28	116	11	155	75%
SPB Spitalfields and Banglatown	72	163	27	262	62%
WHI Whitechapel	64	199	16	279	71%
WVR Weavers	66	332	39	437	76%
<b>TOTAL</b>	<b>802</b>	<b>2850</b>	<b>269</b>	<b>3921</b>	<b>73%</b>

- 3.8 The following wards have the highest number of residential complaints from noise: Weavers, Bethnal Green North Whitechapel and Limehouse.

*PRS Housing Complaints and actions*

- 3.9 The Councils Health and Housing Team also receive complaints direct from the private rented tenants concerning their housing conditions.

The following table identifies the number of complaints over a 5 year period.

*Table Ten: PRS complaints by ward 2010 – 2014(End December)*

	2010-2011	2011-2012	2012-2013	2013-2014	Total
BBB Bromley by Bow	39	34	40	31	144
BCT Blackwall and Cubitt Town	36	46	47	56	185
BGN Bethnal Green North	22	19	26	22	89
BGS Bethnal Green South	31	27	23	25	106
BWE Bow East	37	25	44	38	144
BWW Bow West	33	27	59	54	173
EIL East India and Lansbury	6	15	46	40	107
LMH Limehouse	33	25	40	33	131
MEE Mile End East	35	25	60	46	166
MGT Mile End and Globe Town	39	20	33	36	128
MLW Millwall	32	30	66	46	174
SDS St. Dunstons and Stepney Green	9	16	44	43	112
SHD Shadwell	40	25	40	30	135
SKW St. Katherine's and Wapping	4	7	17	20	48
SPB Spitalfields and Banglatown	35	23	30	23	111
WHI Whitechapel	48	33	49	52	182
WVR Weavers	16	19	27	27	89
TOTAL	495	416	691	622	2224

3.10 The Health and Housing Team also carrying out housing standard inspections in relation to the complaints to ensure that landlords undertake relevant repairs to ensure that the property is fit for habitation.

*Table Elven: Number of PRS Housing inspections undertaken by Ward*

	2010-11	2011-12	2012-13	2013-14	Total
BBB Bromley by Bow	25	11	2	6	44
BCT Blackwall and Cubitt Town	4	4	3	25	36
BGN Bethnal Green North	22	17	22	5	66
BGS Bethnal Green South	13	24	38	14	89
BWE Bow East	45	29	29	12	115
BWW Bow West	41	37	44	27	149
EIL East India and Lansbury	9	4	4	12	29
LMH Limehouse	4	1	9	7	21
MEE Mile End East	30	5	7	20	62

MGT Mile End and Globe Town	5	11	17	25	58
MLW Millwall	15	5	3	17	40
SDS St. Dunstans and Stepney Green		3	22	41	64
SHD Shadwell	25	29	27	18	99
SKW St. Katherine's and Wapping	3	3	6	7	19
SPB Spitalfields and Banglatown	25	24	49	10	108
WHI Whitechapel	72	71	61	44	248
WVR Weavers	35	17	33	11	96
TOTAL	373	295	376	301	1345

3.11 In addition the Health and Housing Team undertake enforcement action by serving notices under the Housing Act to enforce repairs to be undertaken.

*Table Twelve: Number of enforcement actions undertaken in the PRS*

	2010-11	2011-12	2012-13	2013-14	Total
BBB Bromley by Bow	9	24	4	2	39
BCT Blackwall and Cubitt Town	4	5	2	3	14
BGN Bethnal Green North	16	6	2	2	26
BGS Bethnal Green South	25	2	11	11	49
BWE Bow East	10	46	12	5	73
BWW Bow West	16	52	27	25	120
EIL East India and Lansbury	3	1			4
LMH Limehouse	8	2	1		11
MEE Mile End East	18	10	5	2	35
MGT Mile End and Globe Town	49	9	1	2	61
MLW Millwall	12	7		3	22
SDS St. Dunstans and Stepney Green	6	4	2	14	26
SHD Shadwell	18	4	4		26
SKW St. Katherine's and Wapping	5		1		6
SPB Spitalfields and Banglatown	9	3	1		13
WHI Whitechapel	26	8	5	2	41
WVR Weavers	17	2	7	6	32
TOTAL	251	185	85	77	598

3.12 The following numbers of mandatory houses in multiple occupation licences have been granted.

*Table Thirteen: Mandatory licences issued*

	2010-11	2011-12	2012-13	2013-14
BBB Bromley by Bow			2	1
BCT Blackwall and Cubitt Town	2	4	6	3

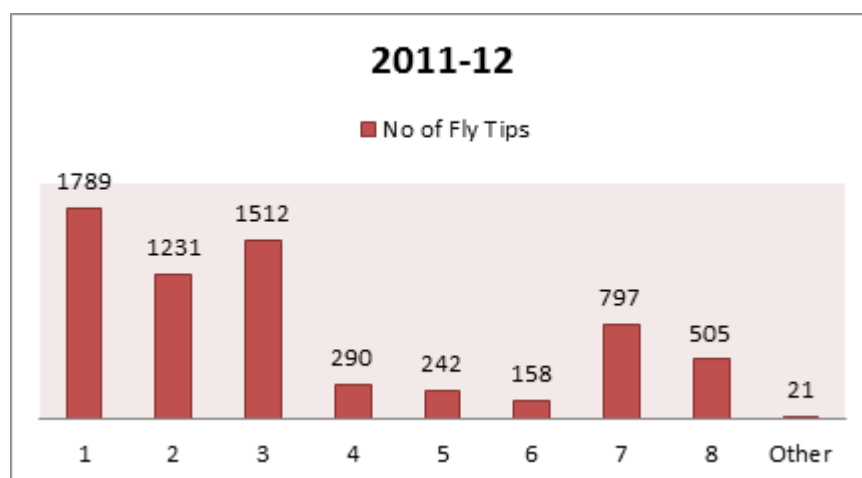


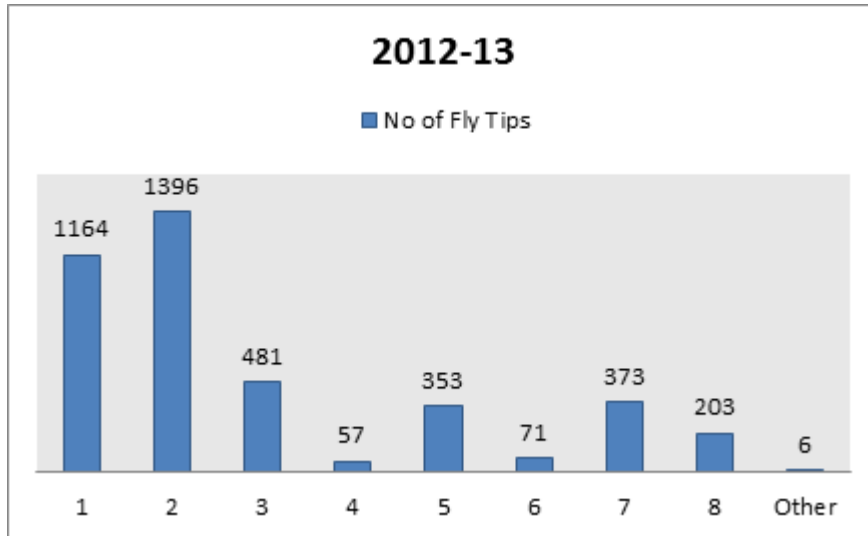
BGS Bethnal Green South		4	1	
BGN Bethnal Green North	2		6	4
BWE Bow East			4	3
BWW Bow West	2	6	7	6
EIL East India and Lansbury			2	2
LMH Limehouse		3		
MEE Mile End East	2		1	1
MGT Mile End and Globe Town			2	1
MLW Millwall	3	6	8	4
SDS St. Dunstons and Stepney Green	5	2	5	4
SHD Shadwell	1	1	2	1
SKW St. Katherine's and Wapping	10	1	1	
SPB Spitalfields and Banglatown	2	2	5	3
WHI Whitechapel		7	6	5
WVR Weavers		3	3	2
	29	39	61	40

#### 4 The amount of fly tipped materials collected

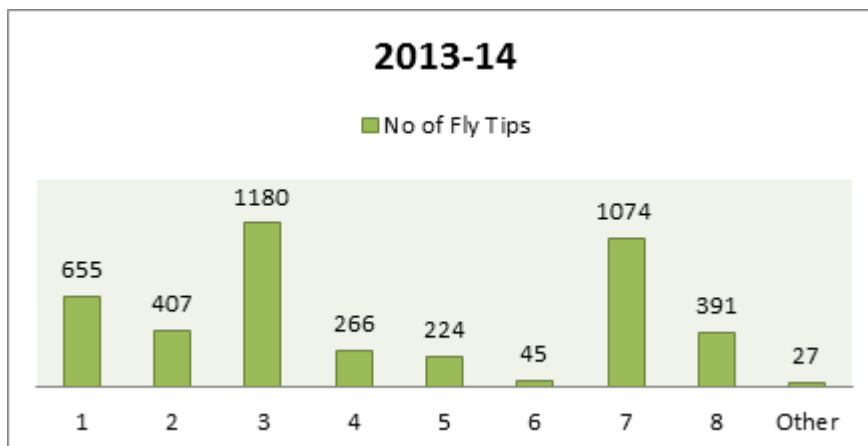
- 4.1 Fly tipped materials has historically been linked to the PRS, with new residents moving into an area and with those leaving have no formal waste removal processes in place.
- 4.2 Local Authorities report their enforcement activities in relation to fly tipping and litter to DEFRA via a reporting mechanism called Fly capture.

*Table 14: Fly capture data compared by LAP and number of fly tips*





For 2013/14 – monitoring period is April to January 2014



4.3 The following LAPS stand out as being problematic for fly tips, 1, 2, 3, and 7.

The Head of Public realm has stated that there are substantial problems in Fieldgate Street and the surroundings roads and they receive regular complaints from residents regarding waste being dumped by private landlords. Veolia remove over 2.5 tonnes of fly tipped waste per day with the annual cost of disposal alone is £98,280.00. The waste mainly consists of household goods such as wardrobes, kitchen units, and renovation material.

## 5 Summary

5.1 The information outlined above does show that there is a potential link between ASB and PRS. It is proposed that once relevant wards are identified, a Housing consultancy is used to:

- 1) Carry out a limited street survey to identify residents views about ASB and linking it to the PRS
- 2) Prepare a report that will enable a consultation exercise to be undertaken in the relevant wards to determine all stake holders' views.

5.2 Once this has been carried out, the matter will be brought back to Cabinet for final determination to whether to seek Secretary of States approval to introduce a Selective Licensing Scheme.

5.3 The following table has been produced to identify the top five priority ranking of each ward, from the parameters discussed in the report to support introducing 'selective licensing' in pilot wards. The wards are the pre 22<sup>nd</sup> May 2014 boundaries

Issue	W HI	S P B	W V R	ML W	BC T	SK W	BG S	B E	LM H	SD S	MG T	B W	BG N	ME E	EI L	S H D
% in PRS	2	4	-	1	3	5	-	-	-	-	-	-	-	-	-	-
Household with no dependent children	4	2	4	3	-	1	-	5	-	-	-	-	-	-	-	-
Council Tax 'churn' 4 changes in 2.5 years	3	4	5	1	2	-	-	-	-	-	-	-	-	-	-	-
ASB Complaints 2012/13	2	5	1	-	-	-	3	-	-	4	-	-	-	-	-	-
ASB Complaints 2013/14 (end Oct)	1	5	2	-	4	-	-	-	3	-	3	-	-	-	-	-
Noise Complaints 2012/13	2	4	1	-	-	-	-	-	-	-	-	5	3	-	-	-
Noise Complaints 2013/14 (end October)	5	-	1	-	-	-	-	2	3	-	-	-	4	-	-	-
PRS Complaints 2010-2014 (end dec)	2	-	-	3	1	-	-	-	-	-	-	4	-	5	-	-
No of PRS inspections 2010/14	1	4	-	-	-	-	-	3	-	-	-	2	-	-	-	5
Enforcement Actions 2010-2014 (end dec)	5	-	-	-	-	-	4	2	-	-	3	1	-	-	-	-
Fly Tipped Totals 2011- 2014 (end Jan)	1	2	-	-	-	-	2	-	3	1	-	-	-	-	3	-
Total parameters in the top 5	11	8	6	4	4	2	3	4	3	2	2	4	2	1	1	1

5.4 The analysis of the initial data suggested that the following areas that should be considered further for setting up pilot areas in relation to PRS licensing are:

- Whitechapel, Spitalfields and Banglatown, Weavers
- Millwall, Blackwall and Cubitt Town
- Bow East and Bow West

5.5 The estimated number of properties affected in the indicated pilot areas are detailed in the table below.

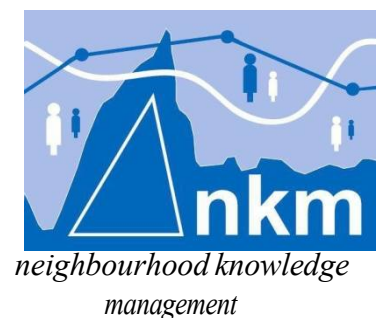
Ward	Properties	Percentage PRS	Estimated number of PRS
Whitechapel		44%	2,578
Spitalfields and Banglatown		41%	1,604
Weavers		31%	1,741
Millwall		50%	5,370
Blackwall and Cubitt Town		43%	3,697
Bow East		31%	2,062
Bow West		28%	1,399

5.6 An estimated 18,451 properties could be affected by a PRS licensing scheme.

# The private rented sector and anti-social behaviour

*The London Borough of Tower Hamlets*

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February 2015**



## **Executive summary**

Tower Hamlets is situated in the east end of London close to London's financial centre and stretches eastward as far as the Olympic Park and to Docklands in the south.

Its population is around 278,000 but such has been the pace of growth and development this is projected to grow to 352,000 by 2025. There is strong evidence that much of this growth will occur in the privately rented sector (PRS).

Compared with social housing where providers are subject to scrutiny from their tenants and vice versa, no comparable arrangements exist within the Private Rented Sector.

The Council therefore wishes to consult on whether or not to introduce a private landlord licensing scheme in the borough in order to tackle significant and persistent problems such as noise nuisance, rubbish accumulation and other ASB designations by requiring landlords to address nuisance issues directly with their tenants.

To do this it needs to demonstrate that the area within the proposed designation that persistent ASB occurs is caused, in part, by private landlords failing to manage their properties (and their tenants) effectively.

However, demonstrating the link between anti-social behaviour and private rental is not straightforward since there is no comprehensive source of information on whether a property is privately let, either divided into rental units or sub-let to tenants.

This report is based on independent research into potential links between the PRS and ASB, wherever they may occur. It is concerned with three main issues, namely:

- The identification of the size of the private rented sector using statistical analysis to predict which properties are privately rented or not
- The size of the private rented sector properties broken down as appropriate rental type for the purposes of additional or selective licensing
- Using statistical analysis, demonstrating a direct link between the private rented sector and ASB both at a household level and locality level

Our results put the Council's own estimates of the size of the PRS which are based on the 2011 census at a slightly higher figure of 37,000 or 31% of the total housing stock although this is very much an upper bound. Of this, approximately 54% single family households and 46% HMOs.

As part of the project we will provide Tower Hamlets with a database of private sector properties providing the risk score of whether a property is more likely to be an HMO or single family rented property plus other attributes of each UPRN.

If a licensing scheme is introduced this database can be compared with licence applicants and used appropriately to follow-up potential non-applicants.

To identify levels of ASB, we used multiple sources of data in several ASB categories using both council data sources and Police reported crime. We found that:



- Council reported personal and nuisance ASB was highly seasonal but increasing in volume over time especially during the summer months
- Enviro-crime including fly-tipping was also seasonal but increasing year on year
- Police reported crime was generally persistent and more common during winter rather than summer months.

In addition risk factors such as Housing Benefit status, untidy gardens, housing dilapidations and pest control events were predictive of Council reported nuisance ASB and community safety reported ASB.

A key finding is that if we take all private properties as a group whether rented or not the incidence of all occurrences of ASB attributable to individual addresses is 9.9% in high risk HMOs and twice the levels seen in the social housing sector as a comparator.

If we restrict our analysis to high risk suspected single family rented properties the noise incident rate is 7.3%. Differences of similar magnitudes were also found in community safety reported ASB and pest control incidents.

Although rates may appear relatively low, they can have a significant impact in an area. As illustration we found that 72k of the 118k residential properties in Tower Hamlets are situated within 10 metres of at least one council reported ASB incident in the last three years.

This implied that almost no area was immune from its effects, but we also found that the density of ASB varied 16-fold with hotspots concentrated mainly in northwest of the borough meaning that not everywhere was equally affected. The correlation between ASB and the PRS at an arbitrary administrative level such as a ward rather than at property level is harder to detect.

In summary, with the PRS set to become even larger because of the inability of the supply of affordable housing in Tower Hamlets to match the expected population growth, there is a reasonable possibility that the current levels of ASB will also grow in tandem based on the evidence presented.

Tower Hamlets also has a large social rented sector and rates of ASB are higher than in all private properties; but when rental status in the private sector is taken into account and account is taken of the risk factors such as those indicated, ASB is higher in private rented rather than social rented accommodation.

It should also be noted that because it is densely populated Tower Hamlets will naturally experience more ASB than some other boroughs (e.g. noise). Whilst there is a case for introducing the scheme across the whole borough, we are aware that the council has logistic concerns about implementation across the entire borough at the same time.

## *Anti-social behaviour and the private rented sector*



This might then steer the council towards initially licensing only certain wards. If so the wards in which ASB and PRS 'hotspots' overlap to a greater degree include the following: Whitechapel, Weavers, Spitalfields and Banglatown, Bow East & West, Blackwall & Cubitt Town and Millwall.

However, this is only a suggestion. Finally, we also note that because the distribution of HMOs and single family rented properties appear to be similar there is arguably no need for Additional or Selective licensing schemes to cover different areas.

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## 1. Introduction

### 1.1 Background

Tower Hamlets is situated in the east end of London close to London's financial centre and stretches eastward as far as the Olympic Park and to Docklands in the south. Its population is around 278,000 but such has been the pace of growth and development this is projected to increase to 352,000 by 2025. There is strong evidence that much of this growth has occurred in the privately rented sector.

Figures from the 2011 Census for example show that the private rented sector (PRS) had grown by 135% since the previous census in 2001 and now totals over 34,000 properties. Since then further growth has taken place and now it may be as high as 37,000. According to a report by HSBC, Tower Hamlets is among the top 50 councils for buy to let properties.<sup>1</sup>

The creation of Buy to Let (BTL) mortgages in 1996 has helped to generate a new generation of small landlords not allied to any professional body and often letting just one or two properties. This means for example that some properties that would have been instantly recognisable as council properties from their appearance or location may no longer be identifiable in the same way.

Concerns about overcrowding and unregulated properties and their negative impacts locally have fuelled a widespread suspicion that the growth in the private rented sector is to blame. This in turn has highlighted an unacceptable element of private renting and the difficulty of dealing with those landlords determined to evade their legal responsibilities.

Tower Hamlets itself has seen recent growth in some categories of anti-social behaviour (ASB) such as fly-tipping and complaints about private rented properties. The effects of ASB are felt by residents in different ways. Untidy and overgrown gardens and noise nuisance are two other examples of issues which have been linked to the failure of private landlords to manage properties in an effective way.

Although the causes of ASB are sometimes complex, Tower Hamlets now considers that Selective Licensing of private rented properties offer the best chance of eliminating or reducing ASB. However it is unsure whether any scheme should cover all properties or only some wards where the problems are understood to be greater.

### 1.2 Additional and Selective Licensing – The legal framework

At present only HMOs which contain 3 or more storeys and are occupied by 5 or more persons forming two or more households are subject to compulsory licensing. Currently, there are only 139 such properties in Tower Hamlets. However, there are two new designations of licensing that provide discretionary adoptive powers for local authorities for all other types of private rented properties.

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<sup>1</sup> [http://www.newsroom.hsbc.co.uk/press/release/hsbc\\_reveals\\_top\\_50\\_buy\\_to\\_let](http://www.newsroom.hsbc.co.uk/press/release/hsbc_reveals_top_50_buy_to_let)



These cover smaller HMOs (Additional Licensing) and all other single occupation private rented sector accommodation (Selective Licensing). For each designation different considerations and definitions apply.

Additional Licensing allows councils to impose licensing on other categories of HMOs if it considers that a significant proportion of these HMOs are being managed ineffectively so as to give rise to problems for those occupying them or for the public.

As with Additional Licensing, Selective Licensing may be introduced in areas of low demand housing or areas with significant anti-social behaviour problems. Such problems, which are usually created by just a few landlords or tenants, can have a significant impact in an area and Selective Licensing is intended to help improve them.

All privately rented properties within a Selective Licensing area have to be licensed, regardless of whether or not the property is an HMO. The Council must consult local landlords before introducing selective licensing in an area and they have to publicise it when it is made. Otherwise many of the provisions relating to selective licensing are similar to those relating to the mandatory and discretionary licensing of (HMOs).

Before introducing such schemes, the Council has to be satisfied it is an area which is experiencing a significant and persistent problem caused by anti-social behaviour and also show that some or all of the private sector landlords who have let premises in the area are failing to take action. The challenge for the Council in the coming months is to be sufficiently satisfied in the evidence linking ASB incidents to the PRS and that this evidence will withstand any legal challenge.

### **1.3 Aims of this report**

Tower Hamlets has already done some limited work into the prevalence of anti-social behaviour into the Private Rented Sector in which there were some early indications of which wards might be possible candidates.

However, it was decided that this work needed to be independently validated and extended in order to provide a broader evidence base that would inform choices about the type and extent of any licensing scheme.

This report therefore has two main aims. These are firstly, to identify the probable size of the private rented market, and secondly to establish to what extent ASB is directly linked at both a property and ward level to rental status.

Specific priorities are therefore:

- Obtaining a better understanding of the location of the private rented sector within the borough – broken down by HMOs and non-HMOs
- Identifying whether there is a clear link between private rented properties incidents of ASB and whether there are any geographical concentrations
- Exploring whether evidence exists to satisfy the requirements of the Housing Act for additional and selective licensing on a borough-wide basis

Achievement of these aims requires a clearer understanding of its private rented sector and its distribution; an understanding of how anti-social behaviour, environmental issues and other council enforcement services are linked to individual properties; and secondly, as strong as possible identification of the probability of which properties are privately rented or not.

Accompanying this report is a database detailing all private sector properties and their likely rental status and other relevant data. The practical value of this database is in monitoring licence applications and identifying compliant and non-compliant properties after the scheme is introduced and for validating the actual rental status of individual properties compared with their predicted rental status.

#### **1.4 Structure of the report**

The remainder of the report is structured as follows:

- Section 2 describes the methodology and data sources used
- Section 3 analyses trends and spatial patterns in ASB by category and profiles households by risk factors
- Section 4 identifies the size of the private rented sector
- Section 5 undertakes a ward level and micro-spatial analysis
- Section 6 summarises the main findings and concludes

## **2. Methodology and data sources**

We begin with a description of the methodology and data sources used for identifying rental status and the measurement ASB. We start with a brief overview of change in the patterns of renting between 2001 and 2011. Although it is now somewhat dated, the Census is useful because it is the only official source of data on tenure types and trends. It does not enable the specific linkage of ASB to individual properties but it does provide a window on the rapid growth in private sector renting over the previous decade and sets the scene for the more detailed analysis that follows.

### **2.1 Changes in tenure since 2001**

As with many other London boroughs the amount of change in tenure-ship in Tower Hamlets over the last decade is striking. Census data from 2001 and 2011, the only official data source on tenure, show that the number of households grew by 28.2% from 80,531 units to 103,268 units over the period. This growth is in large part due to increased population pressures and massive regeneration especially in the south of the borough.

The GLA estimates that the population currently stands at 278k but based on their estimates this is forecast to grow another 27% by 2025 to 352k and to 397k by 2040,



an increase of 47% over 2014. Based on tenancy trends this strongly indicates that the private rented sector will play a major role in accommodating this number of people.

The Census breaks down households into three tenure categories: owner occupied, social housing or private rented. The most noticeable difference between 2001 and 2011 has been the fall in the relative share of social housing from 51% to 39% and the relative increase in the PRS from 18% to 33% of all residential properties over the period.

Table 1<sup>2</sup> shows that whereas social housing fell by 2.7% between 2001 and 2011, owner occupation grew by 18.4% and the PRS by a massive 135.1%, from 14,552 units to 34,216 units. These changes are due to a combination of factors including the lack of affordable properties, population increases, including as a result of immigration, and consequent high housing demand.

Tenancy TH	2001	2011	change %
Owner occupied	22,742	26,935	18.4
Social housing	41,236	40,106	-2.7
Private rented	14,552	34,216	135.1
Total	80,531	103,268	28.2

Table 1: Changes in tenancy between 2001 and 2011 (source: 2001 and 2011 census)

The changes underway in the private rented market are also significant because they are not especially localised with most wards being affected to a degree. However, areas with the largest private rented sectors are wards including Blackwall and Cubitt Town, and Millwall including Docklands, both of which comprise many new developments, and Whitechapel and Spitalfields are mainly old stock.

As Figure 1 also shows the biggest changes between 2001 and 2011 have been in the west (cells A5 to D10) and south (cells H10 to K14) but also in the northeast particularly in Bow East (cell H3). In the darkest shaded wards over 40% of properties are in the PRS; in the areas least affected such as Bromley by Bow (I6) and East India (J8) nearly a quarter of properties are in the PRS as compared with less than 10% in 2001.

<sup>2</sup> 2001:

<http://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=7&b=6275287&c=to wer+hamlets&d=13&e=16&g=6337981&i=1001x1003x1032x1004&m=0&r=1&s=1420216743186&nc=1&dsFamilyId=163>

2011:

<http://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=7&b=6275287&c=to wer+hamlets&d=13&e=61&g=6337981&i=1001x1003x1032x1004&m=0&r=1&s=1420216806123&nc=1&dsFamilyId=2505>

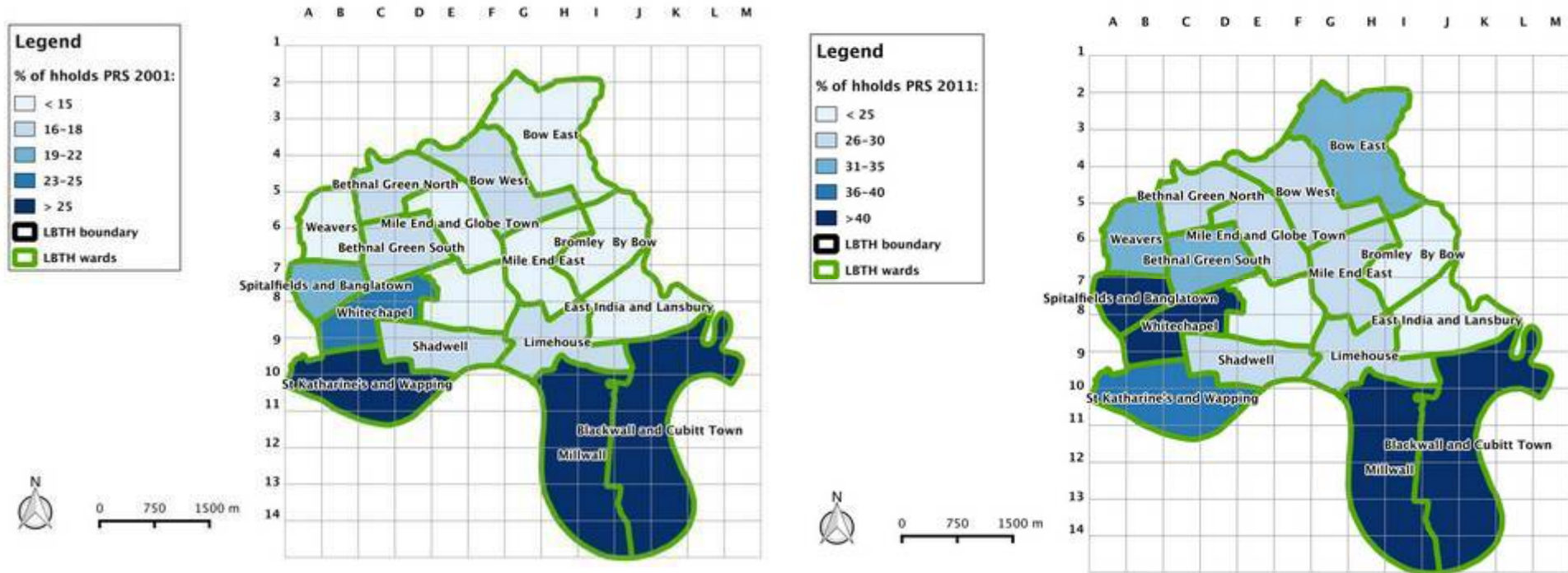


Figure 1: (a) Private rented sector as a percentage of the housing stock in 2001: (b) Private rented sector as a percentage of the housing stock in 2011

## **2.2 Identification of private rented properties**

In the context of selective licensing, census data has two limiting features: firstly it is area-based and secondly it is arguably already out of date. A key requirement is to be able to demonstrate an association between tenure and persistent ASB, but this is not possible unless ASB can be shown to be associated at a property level or that the prevalence of ASB is higher in areas with higher concentrations of privately rented properties.

However, the problem is that there is no specific, comprehensive or up to date information with which to verify whether any individual property is owner occupied or privately rented. All that is known with certainty is whether a property is in the private sector, part of the council stock or social housing. In addition to this problem it is also unclear whether a property is an HMO or being rented by a single family or an owner occupier. This is important because it may affect the type of licence required.

HMOs, for example, can be difficult to identify accurately as their designation depends on the relationship between the occupants living in the property and this can be subject to change over time. Accurate assessment requires an inspection of the property and discussions with the occupants. As previously noted, the present definition of HMOs currently subject to compulsory HMO licensing will be greatly expanded under Additional Licensing and so knowing approximately how many extra properties will be captured as a result is important.

In order to introduce Additional or Selective Licensing councils are required to establish a link between anti-social behaviour on the one hand and private rented sector on the other. This means that as well as identifying whether a property is private rented or not one needs to provide evidence that links rental status to ASB which is methodologically challenging. Once they have done this, the way is open to introduce the scheme and rental properties and their landlords will self-identify as they apply for licences.

Experience suggests that demonstrating that ASB is higher in neighbourhoods with a correspondingly large private rented sector is not particularly difficult but it does not necessarily prove there is a causal link. Our methodology is property as well as area-based in which we use information from a range of sources to measure the likelihood of whether each individual private sector property is rented or not and if so whether it is an HMO or a single family unit.

The methodology is based on work done by ourselves on behalf of Newham Council and others since. This borough, which has progressed farthest in terms of the implementation of selective licensing, has been running the scheme for over a year. In this time it has visited numerous properties which it believed to be at risk. These properties have been flagged either as HMOs, single family private rented dwellings or owner occupied.

The information gathered in this way was used to provide statistical profiles of similar properties in order to predict their rental status. In the practical use of the method,

through selected property visits and the introduction of landlord licences, Newham have reported 90% accuracy levels using this approach which is being improved upon with each visit or landlord contact as the scheme beds down.

We therefore proceeded accordingly in Tower Hamlets. The process involved linking current and historical data totalling tens of thousands of records taken from sources such as Council Tax, Housing and Council Tax Benefit systems and the Electoral Roll to individual properties included in the current Local Land and Property Gazetteer (LLPG) to identify their probable rental status based on rental profiles produced in Newham.

An obvious question is how accurate is this approach when it is applied in another area? The factors themselves such as benefit status and occupant turnover are generic and could apply to any area. However, because the estimates are based on a statistical analysis they do not give a precise answer as to whether an individual property is rented or not but a 'risk score' based on the number of risk factors applying to individual properties.

The practical value of this information is twofold: firstly is that it is possible to determine whether properties with a high likelihood of being rented can be associated or correlated directly with ASB incidents (something that would not otherwise be possible); secondly the information can be used to filter properties at the implementation stage of licensing (e.g. visiting non-compliant properties and checking their rental status).

We use the information on rented status produced in this way in conjunction with separately sourced information on ASB (see next section). As will be seen, we use ASB data in three ways: 1. to analyse ASB trends over time including signs of year on year growth or seasonality; 2. analyses at small area level up to ward size to see if or whether ASB and the rental sector are correlated geographically; 3. where data permit, an analyses of ASB at property level to demonstrate probable direct causality.

### **2.3 Data on Anti-social behaviour**

DCLG guidance advises that ASB is deemed to occur when it falls into one of three categories:

- **Crime:** Tenants not respecting the property in which they live, including vandalism, criminal damage, robbery/theft or car crime
- **Nuisance neighbours:** Noise, nuisance behaviour, animal-related problems, vehicle-related nuisance etc.
- **Environmental crime:** Graffiti, fly-posting, fly-tipping, litter around a property.

Because anti-social behaviour takes numerous forms even within each category, it may be recorded for different purposes and in different ways and by different

authorities. Nearly all data used here is compiled from complainants to the council or relayed to the council via the police.

The data usually show the date and location of the occurrence and the nature of the complaint. Complaints that are sourced to residential addresses are domestic in origin and others originate from external sources.

External sources can be located by grid reference rather than by address. Domestic occurrences can be assigned a UPRN (Unique Property Reference Number) by matching addresses to the Local Land and Property Gazetteer which enables us to map or otherwise analyse the data with considerable precision.

We based our analysis on events recorded between April 2010 and August 2014. Three different databases covering anti-social behaviour are maintained by Tower Hamlets as follows:

- Noise complaints (around 30k occurrences over the period)
- Community Safety ASB related events (14k occurrences)
- Tower Hamlets Enforcement Officers (23k occurrences)

Noise data are collated through the council switchboard during working hours but during out of hours they are routed and collated through the Tower Hamlets Enforcement Officer system (THEOs).

Community safety data are collated by the Community Safety Team's through its call handling centre. The data typically cover a wide range of incident types such as violent or drug related behaviour, but it also includes categories that are litter or graffiti related (e.g. related to hate crimes).

THEO data collated by street wardens are similar in some ways to Community Safety data. However, incident types vary with less emphasis on violent or drug related behaviour and more on litter, fly tipping etc.

#### Other data sources

Although not strictly covered by the standard definitions of ASB we have found other data sources to be useful which are predictive of ASB and tend to be more associated with the PRS than with other tenancy types.

These include pest control data which are based on call-outs to attend to rat, mice or insect infestations (about 20k incidents over the period) and secondly housing complaints (about 1,000 a year).

Housing complaints are mainly but not exclusively from private rented tenants. They include housing hazards of various kinds (e.g. gas, electricity, and dangerous structures), problems with damp and mould, overcrowding and suspected illegal HMOs.



We also made use of previous work undertaken by ourselves from the time of the last census during which we estimated the population of Tower Hamlets using only administrative sources of data.

This data source contained information, inter alia, by household type, occupancy, benefit and tenancy status. Although now slightly old it fills some important gaps in the data especially in terms of household types.

### 2.4 Use of pre-2014 wards

The old pre 2014 ward areas are used throughout this report. This is because any historical ward data at a ward level is captured using these areas and these were the ward areas in use when potential licensing schemes were initially considered.

## 3. Patterns of ASB in practice

In this and following sections, we report our results. We begin with an analysis of trends in different categories of ASB through time from April 2010 to August 2014. A rising trend will signify whether ASB is a growing problem or not and if so in which ASB category.

### 3.1 Trends in ASB

(a) Noise complaints

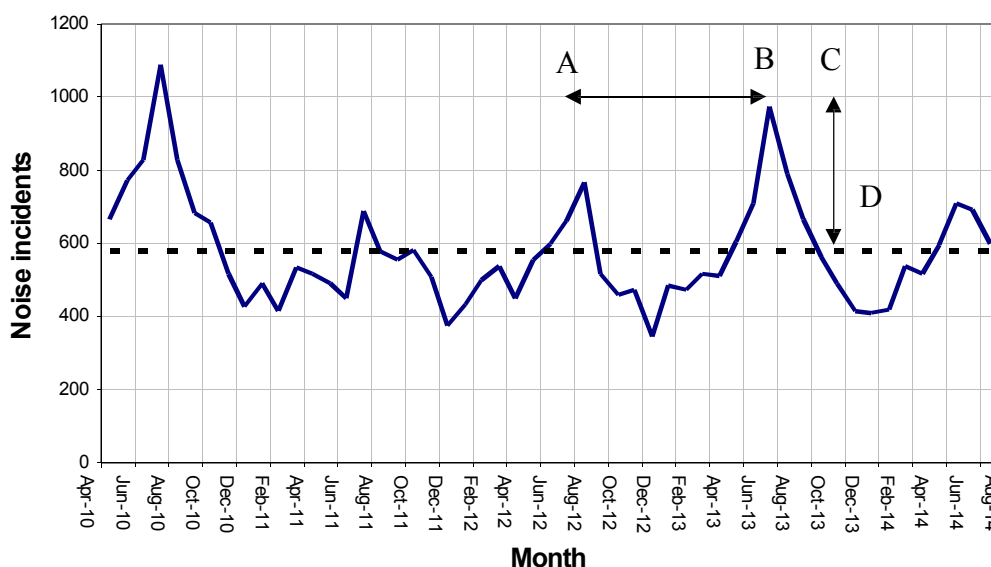


Figure 2: Monthly occurrences of noise complaints from April 2010 to August 2014

Domestic noise complaints account for two thirds of all occurrences in this data set and of these the most common complaint by far is loud music. A second important cause for complaint is construction or demolition work which accounted for 12% of occurrences.

Transport or animal related noise occurrences only account for around 3% of occurrences and other external causes (e.g. pubs, clubs, leisure facilities, or commercial premises) for the remainder (~ 19%).

Figure 2 shows the pattern over time. There are about 600 complaints per month on average. As can be seen noise complaints are highly seasonal with most occurring during the summer months peaking in August (see A to B).

While the pattern is repeated each year it can be seen that the peaks vary in intensity (e.g. C to D) from year to year and may be weather related (e.g. more outdoor activity during hot summers). The overall trend however appears to be persistent and there is no discernible trend to the annual pattern either up or down.

(b) Community Safety ASB

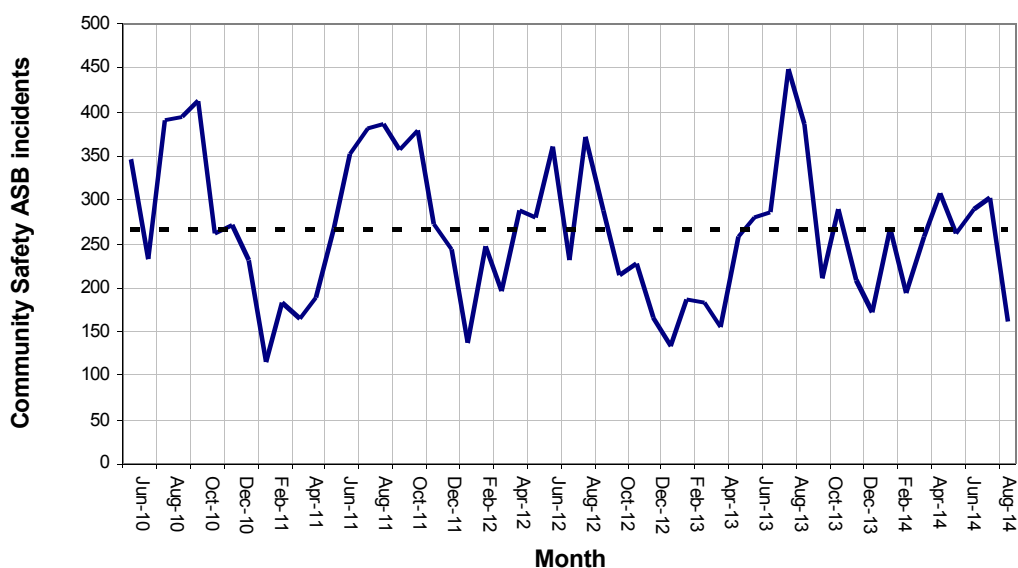


Figure 3: Monthly ASB occurrences from April 2010 to August 2014

Community safety data reveal that about one-third of all complaints are noise related. However, other important designations fall under several categories. The most important of which are drug related (16%) and violent behaviour (12%).

Other categories that stand out are alcohol related (4%), criminal damage to property (3%), litter (3%), and vehicle related (3%). There are about 260 incidents a month on average in all the categories analysed.

As with noise data above there is a strong seasonal pattern to the data as Figure 3 shows, although again the duration and intensity of the summer peak varies. Overall there is no long term discernible trend either up or down.

(c) Tower Hamlets Enforcement Officer (THEO) data

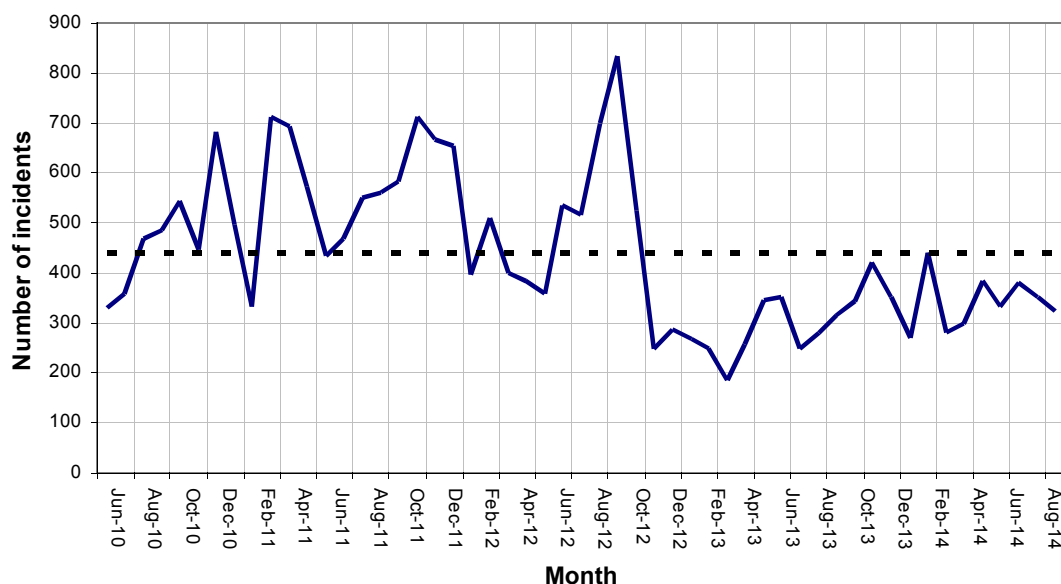


Figure 4: Monthly THEO reported occurrences of ASB from April 2010 to August 2014

Enforcement officer collated data is dominated by litter or alcohol-related categories. These account for 21% and 26% of occurrences respectively. Other much smaller categories include noise (4%) and drug related incidents (3%) and criminal damage (2%).

As Figure 4 might suggest, the data are characterised by a miscellaneous range of unconnected incidents with relatively little pattern. Most are not domestic related and therefore not easily attributable to individual properties.

There is between 440 reported incidents a month on average but also no particular seasonality in pattern. Compared with 2011/12, the pattern since has been downward with incidents down by over a third but the reasons for this have not been investigated.

*Related trends*

(d) Pest control

Figure 5 reveals a strong and persistent seasonal pattern in calls to the pest control service. Peak months for activity are in August and least in December with about 400 reports per month on average.

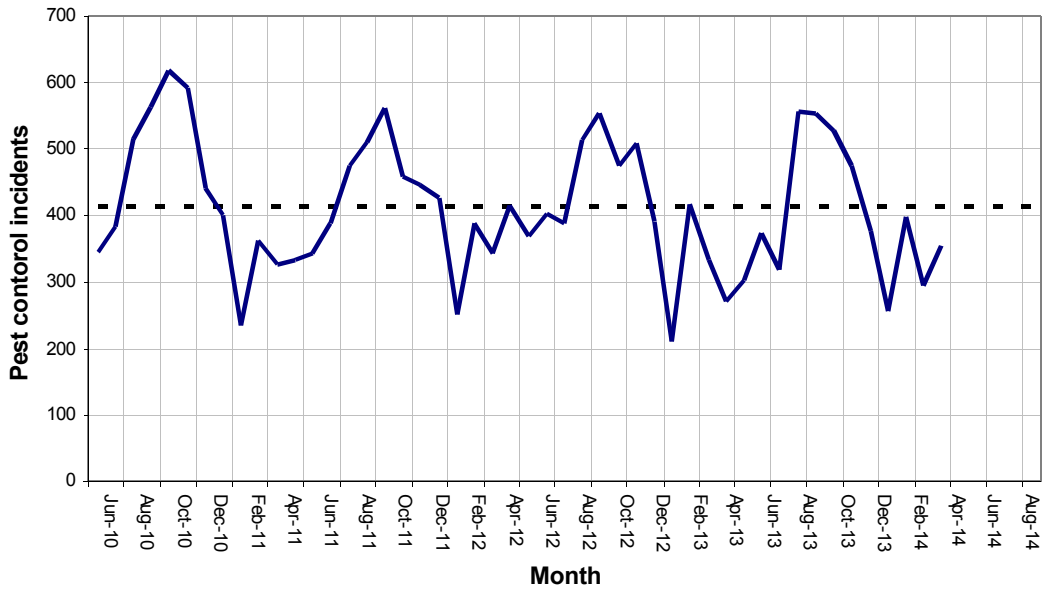


Figure 5: Monthly reports of pest occurrences from April 2010 to August 2014

(e) Housing complaints

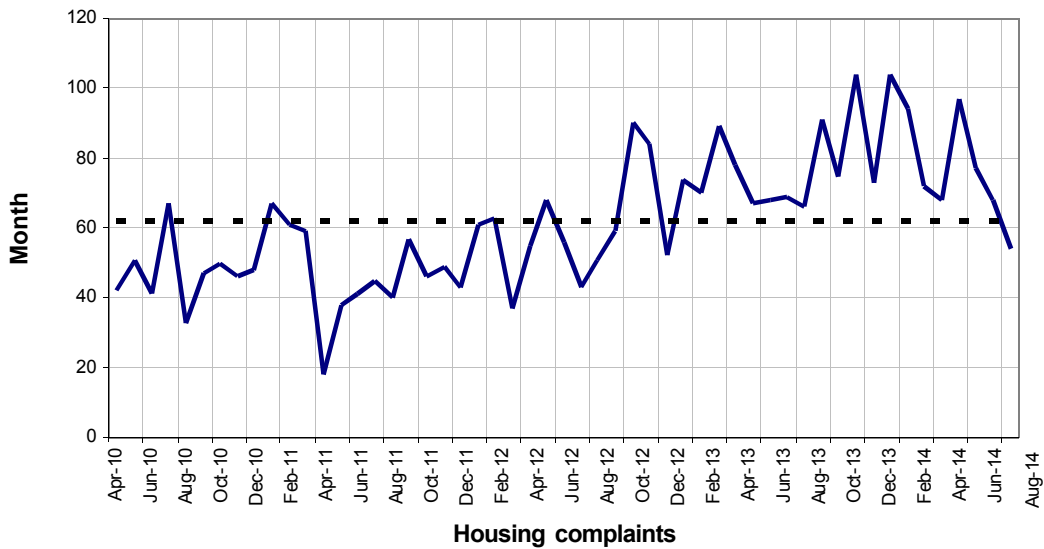


Figure 6: Monthly housing complaints from April 2010 to August 2014

Housing complaints are low as compared with other incident types and are usually initiated by tenants; however, their frequency is increasing as shown in Figure 6. Monthly complaints average 61 but their increase is probably related to the growth in the PRS and for this reason is likely to continue.



### 3.2 Profiling ASB by household type

That levels of ASB can vary by household type is to be expected. To test to what extent such differences are both large and systematic, we used *nkm* data from 2011 based on a project for the Council.<sup>3</sup> This project estimated the total population of Tower Hamlets using local administrative sources in which, as a by-product, counts by household type were also produced. This report is widely referred to in Tower Hamlets documents and was used to help validate the results of the 2011 Census.

Category	description
A	family households with dependent children
B	single adult households with dependent children
C	older cohabiting households
D	older person living alone
E	three generational households
F	cohabiting adult households no children
G	single adult households
H	other households

Table 2: Classification and definitions of households

Table 2 is a list of eight mutually exclusive household types which are largely self-explanatory. Using incidents identified in the data sets from the previous section that could be linked to addresses, we assessed the levels of ASB, pest control and housing complaints against each type over a three-year period by household type.

Our results are shown in Table 3. This enumerates the number of privately owned households of each type, the population they contain and rates of occurrence for each incident type. As can be seen the most numerous household types are F and G which are cohabiting adult households (no children) and single adult households living alone.

Type A family households are the next most numerous. Although substantially fewer in number, they contain almost equivalent populations to type F and G. Other household types are much fewer in number by comparison.

As far as incident rates are concerned the following points can be made:

- Noise complaints and pest control events are the main ASB markers affecting households, followed by community safety ASB reports and housing complaints
- Type E three-generational households which are often overcrowded appear to be associated with the highest levels of noise, pest control and are roughly equal highest on ASB rates, and housing complaints
- Types A and B family and single parent households also can be associated with higher rates of ASB, noise complaints and pest control

<sup>3</sup> *nkm* – neighbourhood knowledge management: A system for estimating population and households using administrative data. [www.nkm.org.uk](http://www.nkm.org.uk)

- Older households with a least one person aged 65+ are not immune from noise complaints, pest control, or other events; however types F and G household with working age adults tend to have slightly lower rates across all categories

Rental status aside, it can be surmised from the above that households most likely to be associated with these ASB markers are unlikely to be people that live alone and more likely to be family households or have above average numbers of people living in them. In the next section we profile ASB at a property level.

Household type	Population	number	community safety noise	community safety ASB	council pest control	THEOs	housing complaints
A	32,134	6,932	32.4	6.7	21.2	0.5	4.1
B	8,826	3,341	31.0	5.6	16.2	0.4	4.7
C	3,961	1,584	28.3	5.4	18.4	0.3	1.3
D	1,397	1,397	20.6	3.4	11.3	0.4	1.1
E	5,013	756	49.5	6.6	39.6	0.4	4.1
F	35,060	15,551	19.9	3.0	8.1	0.5	1.7
G	29,667	29,668	17.1	2.8	5.3	0.8	1.8
H	1,048	569	24.4	4.0	14.4	3.2	1.8
Total	117,106	59,798	21.2	3.6	9.5	0.7	2.2

Table 3: Breakdown of Tower Hamlets private sector properties by household type and ASB risk markers; all rates expressed as percentages. Note: Excludes social housing, hostels, care homes, student accommodation, HMOs

### 3.3 Property level profiling of ASB risk factors

In this section, we develop the concept of a risk ladder to quantify the association between specific risk factors and ASB at an individual property level rather than a ward or some other level. A risk ladder is a table that enumerates all possible combinations of risk factors, quantifies the number of households exposed to each risk factor combination, and models the associated rates of ASB in each case.

For the purposes of this analysis ASB is defined as there being at least one event at an address on the Community Safety database in the last three years. We find that the risk factors used are predictive of ASB especially if they occur together (e.g. a noise complaint at the same address, a pest control call out or something else to do with the property).

The key point is how predictive of ASB are these events depending property characteristics and how many properties share these characteristics. The information is useful since it can result in a more targeted and joined up ASB reduction strategy to the extent that risk factors are modifiable in terms of local housing policy and regulation.

After some experimentation using potential risk factors taken from all address based data sources, a smaller number of the most predictive factors of ASB were selected and analysed in depth. However, we also investigated other combinations of risk factors and property types and we report these results also.

The risk factors included in our example include Housing Benefit status which is a proxy for low income and partly for private rental status, secondly possible overcrowding, and lastly noise or housing complaints. The definition of noise complaints for this purpose is that there should have been at least one reported event over the period. The results are tabulated from high risk households to low risk and are shown in Table 4.

In all 73,098 private sector properties were analysed. Column two lists the number of private sector properties exposed in each risk category; the next four columns show whether or not a risk factor applies in that risk category denoted by ‘Y’), and the final column shows the risk of ASB occurring based on the given risk factors expressed as percentage. There are 16 sub-categories altogether as defined by the presence or absence of each risk factor.

At the foot of each column is the total number of occurrences of each risk factor, so for example there were 5,087 address linkable noise events complaints at address level in the period and so on. The risk of ASB is ordered from categories at highest risk (row 1) to those at least risk (row 16). The average risk of ASB across all properties is 2.2% and is shown in the bottom right hand corner of the table.

Category	number of UPRNs in category	five or more residents (nkm)	Housing Benefit	noise complaints	housing complaints	At least one ASB event in last three years
1	5	Y	Y	Y	Y	60.0
2	62	Y	Y	Y		40.3
3	20	Y		Y	Y	30.0
4	25		Y	Y	Y	28.0
5	335		Y	Y		25.4
6	253	Y		Y		20.9
7	139			Y	Y	20.9
8	3,193			Y		13.0
9	87	Y			Y	6.9
10	70	Y	Y		Y	5.7
11	716	Y	Y			5.2
12	2,256	Y				4.8
13	222		Y		Y	4.1
14	3,652		Y			3.6
15	712				Y	3.4
16	61,351					1.0
total	73,098	3,469	5,087	4,032	1,280	2.2

Table 4: Risk ladder showing the risk of ASB based on the given risk factors in private sector residential properties

Some risk categories apply to only a small group of properties and others to much larger groups. For example row one, contains only five properties. It has a predicted risk of 60%, which is around 27 times the borough average and is in a category in which all four risk factors apply.

The last risk category in row 16 contains 61,351 properties; no risk factors apply to this group and the level of ASB at 1% is half the borough average of 2.2%. This underlines the fact that ASB is concentrated in relatively few private properties in all.

Further analysis of the information in Table 4 shows the influence of each risk factor in turn on ASB (Note: all odds are significantly different from one at  $p=95\%$ ). This finds that ASB rates increase:

- 2.7 times if there is five or more people living at the address
- 2.4 times if a UPRN is in receipt of Housing Benefit
- 11.9 times if there has been any noise complaint
- 1.8 times if there have been any housing complaints

This suggests that the strongest predictor of ASB is whether there have been noise complaints. From Table 4 it can be seen that this risk factor occurs in the first 8 rows of the risk ladder. The risk factor odds are multiplicative so if just the first two risk factors applied, i.e. possible overcrowding and Housing Benefit, the odds are increased by  $2.7 \times 2.4 = 6.7$  times i.e. a property is 6.7 times more at risk than a property where neither of these factors applies.

Figure 7 is a graph showing the predicted impact on ASB of these risk factors versus the observed risk. As can be seen the results show a strong correlation with these four factors statistically explaining about 96% of the observed variation in ASB incidence, suggesting that these particular risk factors are highly predictive of ASB.

### 3.4 Social versus private housing and multiple events at the same address

This analysis can be extended to the social housing as well as the private sector. Tower Hamlets has a large social housing sector and so it is relevant to ask if ASB varies between these two sectors. In general we obtain a risk factor of 1.4 in favour of social housing which means that, other things being equal, the odds of ASB rates are higher in social housing than the entire private sector by this factor.

However, if ASB occurs in private sector properties which are also associated with any of the other risk factors in Table 4 then private sector ASB rates will be considerably higher. For example ASB incidence rates in social housing with *no other risk factor associated* is 2.5% but in the private sector for a household receiving housing benefit the rate is 3.9%.



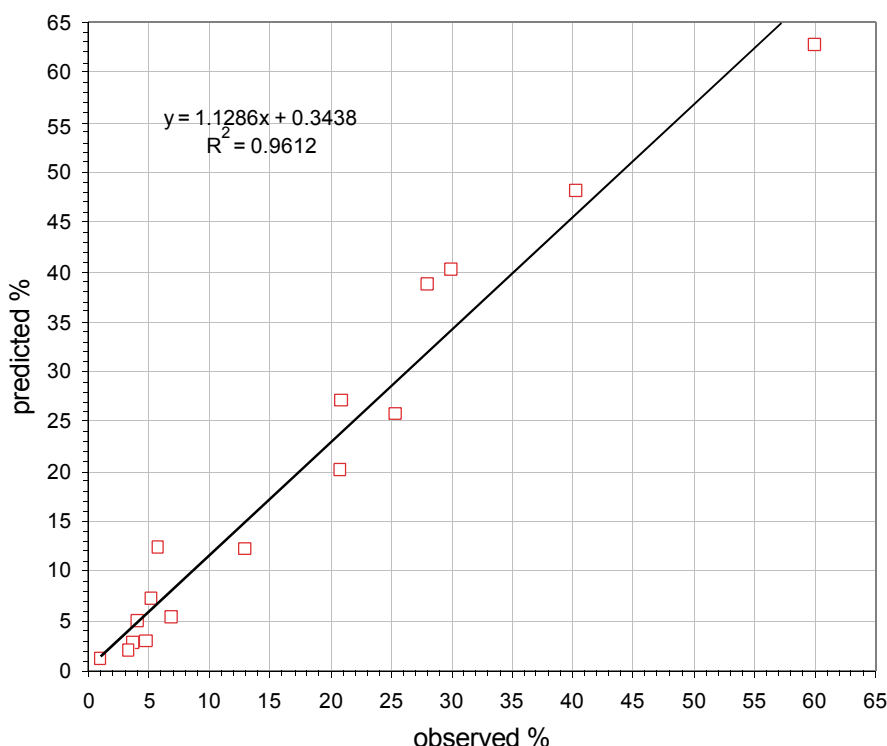


Figure 7: Predicted and observed variation in ASB according to selected risk factors

The same result applies if other risk factors are used; for example, if pest control had been included then it would increase the odds of an ASB event by a factor of 1.6. We conclude from these results that there is a risk gradient with some types of household more likely to be associated with ASB than others depending on the risk factors applying.

However, thus far we have not yet looked at multiple events at the same address. Plainly, some addresses may have been reported more than once to the Council and the extent to which this occurs is of potential significance (e.g. where a small number of properties cause a disproportionate number of incidents).

We found little difference between private sector properties and social tenure in this regard. Overall 5.5% of properties in the private sector and 6.4% in social housing are associated with one or more noise complains and 1.9% of private properties and 2.5% of social housing two or more incidents.

However, this analysis fails to separate out the PRS from the general private sector. In the next section we show that levels of ASB are substantially higher than in either the private sector as a whole or in social tenure i.e. a private rented property carries a greater risk of ASB than either of these other categories.

#### 4. Identifying the private sector rented stock

As previously stated, the problem is that there are no complete data on which properties among private sector housing are rented or not although many will self-identify if for example Housing Benefit is claimed. Our analysis above identified the

extent of ASB but did not draw the link with private rented status specifically, only a general stratification of properties at risk in the private and social housing sectors. This issue is now addressed.

Newham, the farthest progressed borough in terms of selective licensing, has been running a selective licensing scheme for over a year. In this time it has visited numerous properties which it believed to be at risk of rental status. In other words there was a high likelihood that the properties in question were being lived in by rent paying tenants. These properties were flagged either as HMOs or single family private rented dwellings.

Each property can be linked to risk factors such as benefit status and turnover and profiled to other properties that have not been visited. The factors themselves are generic and are combined in a database of all private sector properties by assigning a risk score to each property which is predictive of the likelihood of a private sector property being rented or not. We call properties with the highest likelihood of rental status as being most 'at risk' of being private sector rented.

Unvisited properties in Newham at high risk that have not registered under the scheme are selected and then visited on a systematic basis. Because the methodology is probabilistic, it does not give a definitive answer as to whether a property is privately rented or not but simply a probabilistic score. However, its use in practice has resulted in around a 90% accuracy of identification.

In previous work for Newham, different combinations of risk factors were systematically analysed for their predictive power in terms of any of the three outcomes. This process resulted in the creation of three binarised sets of risk factors, one for each outcome (i.e. a risk factor was either present at an address or not).

For each risk factor the odds were calculated using the model. Four risk factors with the best predictive power were used giving rise to 16 possible risk factor combinations per address for each outcome. Odds schedules were then tabulated and are explained in the results section below.

Although the identified risk factors are highly intuitive and plausible, the analysis is not without its limitations. The sample of visited properties is rich in information but relatively small in terms of sample size and it is also based on a different London borough.

This has four possible effects on the analysis:

- First, although selected risk factors are generally statistically significantly different from zero at the 95% level of confidence, confidence intervals tend to be wide
- Second, not all possible risk factor combinations are observed in the Newham data collected during visits. This means that the reported odds of them being in either category are based on the extrapolation of risk factors present in other categories which had been visited

- Third, some risk factors may overstate the effect in some cases where prior selection criteria had been used to identify a particular property e.g. where housing officers had prior intelligence they could use
- Fourth, risk factor weights in LB Newham may not be identical to weights in Tower Hamlets which means that risk scores could vary between the boroughs. However, Newham and Tower Hamlets share a border and so might be expected to share some similarities.

#### 4.1 Results

In this section we use the linked data sets to identify HMOs and single family rented properties in Tower Hamlets so as to distinguish between them as far as possible, based as closely as possible on Newham risk factor profiles. We begin with HMOs.

##### (a) HMOs

The risk factors for identifying HMOs are as follows:

- No current CTRS (Council Tax Reduction Scheme<sup>4</sup>) recipient at address: A property not receiving CTRS is estimated to be 3.1 (1.1 to 9.1, p=95%) times more likely to be HMO status than a property receiving Council Tax Benefits. A possible explanation for this is that properties receiving Council Tax Benefit tend to be older person households or owner occupied rather than a landlord.
- Two or more changes in Council Tax liable surname in last 36 months: A property in which the surname of the person responsible for paying Council Tax had changed at least three times in the previous 36 months, a measure of turnover, was 1.1 (0.48 to 2.6, p=95%) times more likely to be an HMO.
- At least one change in electoral roll registrants in last 12 months: Properties in which the surnames of at least one current registrant at an address were not present the previous year were estimated to be 2.1 (0.9 to 4.5, p=95%) times more likely to be HMOs than properties where there had been no changes.
- More than two surnames on the Electoral Roll at address in last 36 months: Properties with three or more surnames registered at the address over the previous 36 months is estimated to be 6.9 (2.9 to 16.5, p=95%) times more likely to be HMOs than properties with three or fewer. This is the most predictive of all the risk factors selected

Table 5 shows the number and proportion of properties impacted by each risk factor combination. As previously stated the column to the right shows the relative risk score with risk categories ranked from high to low which are probability based. The simplest way to interpret the risk score is that a property with the given risk factors is

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<sup>4</sup> CTRS = Council Tax Reduction Scheme. a benefit which provides low income households with financial support for paying their Council Tax

$x$  times more likely to be an HMO than if none of the risk factors existed where  $x$  is the risk score.

Category	Private sector UPRN	% of private sector	No Recipient of Council Tax Benefit at address	2 or more changes in CTL name in last 36 months	Any change in electoral roll registrants in last 12 months	Three plus surnames in Electoral Roll last 36 months	risk score
1	3,618	4.95	Y	Y	Y	Y	48.8
2	4,092	5.60	Y		Y	Y	43.8
3	536	0.73	Y	Y		Y	23.6
4	640	0.88	Y			Y	21.2
5	305	0.42		Y	Y	Y	15.9
6	470	0.64			Y	Y	14.3
7	70	0.10		Y		Y	7.7
8	7,184	9.83	Y	Y	Y		7.1
9	102	0.14				Y	6.9
10	12,539	17.15	Y		Y		6.3
11	8,207	11.23	Y	Y			3.4
12	30,458	41.67	Y				3.1
13	600	0.82		Y	Y		2.3
14	1,201	1.64			Y		2.1
15	591	0.81		Y			1.1
16	2,485	3.40					1.0
Total	73,098	100.00	3.06	1.11	2.07	6.92	

Table 5: Risk ladder showing the relative risk of a property being a private sector HMO

As is seen the properties at highest risk or likelihood of being HMOs are those where there has been no entitlement to CTRS, two or more changes in the name of the person responsible for paying Council Tax, any change in electoral registrants in the last 12 months, and more than two different surnames on the Electoral Roll in the last 36 months.

Table 5 suggests there are about 17,017 properties at higher likelihood of being HMOs. This assessment is based on the first nine risk categories with the highest scores in which all bar one (row 8) have share a high turnover of residents, the most influential of the risk factors. For example a property in row 1 in which 3,618 are identified as having all four risk factors is nearly 49 times more likely to be PRS than one in row 16 which has none of the given risk factors for which there are 2,485 properties identified.

A key finding is that if we take all private properties as a group whether rented or not the incidence of all occurrences of ASB attributable to individual addresses is 9.9% in the top nine risk categories for noise and 4.2% in the seven low risk categories. If we do the same for community safety reported ASB it is 3.1% and 1.9% and for pest control incidents 8.2% versus 5.2% (all differences statistically significant from zero (p<0.001). Hence we find that in each category the incidence of ASB leans towards properties more likely to be HMOs than not.

(b) Single family rented properties

The risk factors for single family rented properties are as follows:

- No CTRS recipient at address: A single family privately rented household is less likely to receive CTRS but more likely to receive Housing Benefit (see below). Not in receipt of CTRS increases the odds of private rented status 1.6 times 1.6 (0.9 to 4, p=95%) times.
- Two or more changes in Council Tax liable person surname in last 36 months: Any change in Council Tax liable person surname is predictive of single family status (also with HMOs). In this case the odds of a property being single family rented status is increased 1.6 (1.00 to 2.47, p=95%) times.
- Two or less adults at address: Two or less adults at an address are predictive of single family status rather than HMO status. It is estimated that this factor increases the odds of private family rented status 1.2 times (0.74 to 1.95, p=95%) times.
- Housing Benefit recipient at address: Rented single family households can be identified by their Housing Benefit status. This is by far the strongest of the four predictive risk factors, increasing the odds of identification 4.7 (2.63 to 8.00, p=95%) times.

Table 6 shows the number and proportion of properties impacted by each risk factor combination and the comparable proportion of households in each category. The column to the right shows the relative risk or likelihood score with risk categories ranked from high to low.

These are obtained by multiplying the risk factor weights at the foot of the table under each risk factor. A risk score of say 9.1 in row 3 means that the outcome is 9.1 times more likely than if none of the risk factors were present as in row 16. The contribution of each risk factor to the odds of private rental status is shown in the bottom row.

It is noteworthy that Housing Benefit has the most influence amongst these. It increases the odds of private rental status 4.65 times and appears in each of the top eight risk categories. Other risk factors make smaller contributions whilst the final column is obtained by multiplying the odds together to derive an overall risk score. To put a scale on the findings the results suggest that there are around 20,248 properties in the top nine risk categories all of which claim Housing Benefit.

If we restrict our analysis to high risk suspected single family rented properties in high risk rows 1 to 9 we find that the incidence of noise incidents is 7.3% as compared with 4.8% in the bottom seven categories. Additionally, the incidence of community safety reports of ASB is 3% in the top nine risk categories as compared with 1.9% in the bottom seven categories whilst the comparative figures for pest control are 7.3% versus 5.4%. Again, the difference between the all-property rate and high risk single families is statistically significantly different from zero (p<0.001).

Category	Private sector UPRNs	% of private sector	No Recipient of Council Tax Benefit at address	2 or more changes in CT liable person 36 months	2 or less adults at address ER	Any recipient of Housing Benefit at address	Risk score
1	131	0.2	Y	Y	Y	Y	14.3
2	31	0.0	Y	Y		Y	11.9
3	265	0.4	Y		Y	Y	9.1
4	1,232	1.7		Y	Y	Y	8.8
5	100	0.1	Y			Y	7.6
6	275	0.4		Y		Y	7.3
7	2,490	3.4			Y	Y	5.6
8	563	0.8				Y	4.7
9	15,161	20.7	Y	Y	Y		3.1
10	4,222	5.8	Y	Y			2.6
11	32,569	44.6	Y		Y		2.0
12	38	0.1		Y	Y		1.9
13	14,795	20.2	Y				1.6
14	21	0.0		Y			1.6
15	691	0.9			Y		1.2
16	514	0.7					1.0
<b>Total</b>	<b>73,098</b>	<b>100</b>	<b>1.63</b>	<b>1.57</b>	<b>1.20</b>	<b>4.65</b>	

Table 6: Risk ladder showing the relative risk of a property being a private sector single family household

How do these estimates compare with what is known about the size of the private rented sector? The only data available are from the 2011 census which reports a figure of 34,216 (see Table 1). Our figure combines estimates in Table 5 and 6 above based on the top nine risk categories in each table. This gives a combined total 37,265 so around 3,000 units more.

However, since there is inevitable overlap between HMOs and single family designations in our methodology, our figure must be regarded as an upper bound. Given that the Census is now over 3 years old and also taking into account the rapid pace of change in Tower Hamlets we believe the most accurate estimate lies somewhere between.

## 5. Ward level

The total number of identified high risk rental properties in the previous analysis gives an estimated size of the private rental sector of around 37,000 properties consisting of approximately 54% single family households and 46% HMOs. This total is based on probabilistic estimates and so could be higher or lower but it compares reasonably well with the total size of the PRS given in the 2011 Census of around 34,000 and after allowing for the fact that the Census is now over three years old.

As part of the project we will provide Tower Hamlets with a database of private sector properties providing the risk score of whether a property is more likely to be an HMO or single family rented property plus other attributes of each UPRN.



In this section, we analyse the spatial distribution of the PRS properties (i.e. properties with a high likelihood of being private rented) and link it to previous indicators firstly at ward level and then at a micro-spatial level. We analysed four categories of ASB: Noise incidents (A), community safety ASB (B), council pest control (C), and incidents collated by local enforcement officers (THEO) (D).

We can compare the results with the proportion of PRS in each ward versus all property types with the concentrations of ASB designations. The first column of Table 7 ranks each ward by the estimated number of private sector rented households among all property types. The proportions obtain bear similarity with the results of the Census three years earlier but concentrations are now slightly higher.

Alongside this information Table 7 also shows the rank of each ASB designation by ward. A final column ('overall rank') is a ranked combination of each previous ranking to give an aggregate assessment of the concentration of ASB in each ward. The wards are ordered based on the size of the PRS relative to the housing stock. We can see that for example that Bethnal Green South ranks 5<sup>th</sup> in terms of the size of the rented sector but 1<sup>st</sup> in terms of ASB.

The results show that ASB and the size of the PRS are not perfectly aligned. The two highest ranked wards for PRS, Millwall and Blackwall and Cubitt Town for example, are ranked lowest on ASB. However, there is a much closer alignment in Whitechapel (ranked 3<sup>rd</sup> on PRS and 4<sup>th</sup> on ASB), and Bethnal Green South (5<sup>th</sup> on PRS, 1<sup>st</sup> on ASB).

As can be seen therefore the pattern is irregular but it does not mean that ASB and PRS are unrelated since it depends on other risk factors outlined previously which showed that PRS properties were more prone to ASB. However, the main problem is that ward boundaries do not necessarily correspond with PRS and ASB hotspots. We therefore sought a different method of identifying these hotspots and the wards chiefly affected so that we could then work backwards to determine which wards in particular should be targeted.

Rank PRS as % of all propert- ies	Ward	% PRS of all propert- ies					ASB overall rank
			A	B	C	D	
1	Millwall	48.8	17	17	16	17	17
2	Blackwall and Cubitt Town	39.5	16	16	14	16	16
3	Whitechapel	39.5	6	9	1	5	4
4	Bow East	36.3	13	12	15	14	14
5	Bethnal Green South	32.8	2	4	2	1	1
6	St Katharine's and Wapping	31.4	15	13	13	15	15
7	Shadwell	31.0	9	8	9	9	9
8	Mile End and Globe Town	28.7	4	1	5	4	3
9	Spitalfields and Banglatown	28.4	7	14	4	2	6
10	Weavers	27.5	1	3	6	3	2
11	Bow West	26.8	5	6	3	8	5
12	Limehouse	26.6	8	7	10	10	9
13	Bethnal Green North	25.8	3	2	17	6	7
14	Mile End East	24.6	14	15	8	12	13
15	East India and Lansbury	22.6	12	11	11	13	12
16	Bromley By Bow	21.9	11	10	12	11	11
17	St Dunstons and Stepney Green	19.8	10	5	7	7	8

**Key to columns A to D**

A	B	C	D
community safety noise	community safety ASB	council pest control	community safety THEOs

Table 7: Tower Hamlets wards ranked by PRS size and ASB categories



Figure 8: Tower Hamlets map showing ward boundaries and names



## **5.2 Micro-spatial analysis of ASB and the PRS**

Micro-spatial analysis involves analysing the co-location and incidence of ASB and rented properties at a small area level. Its advantage is that we can avoid boundary effects by drilling down and analysing the co-occurrence of ASB and the PRS at different spatial scales. We tested various different approaches: Cell level, property level and hotspot analysis.

### **(a) Cell maps**

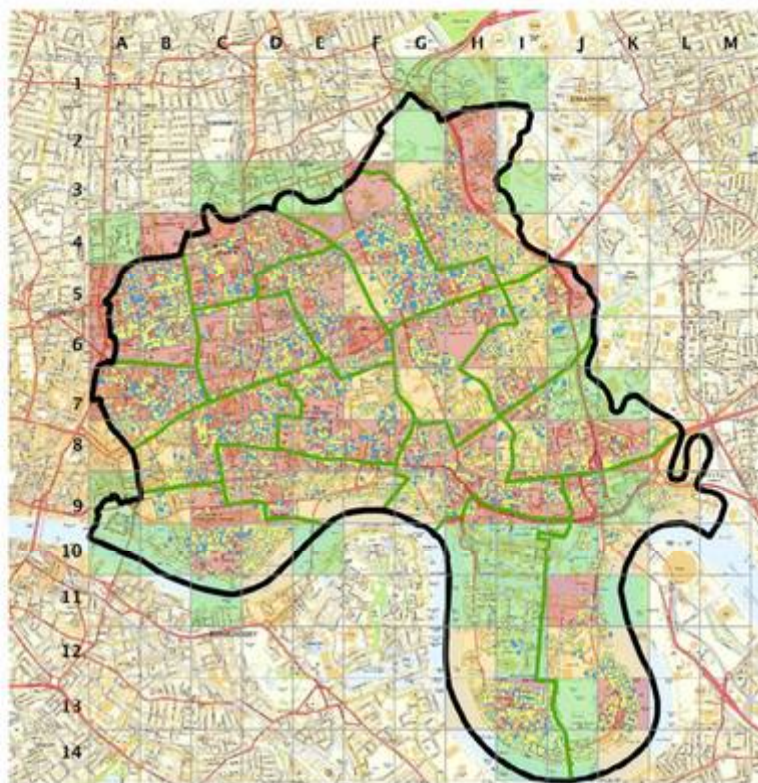
In this first example, we use grid-level analysis i.e. areas that are not tied to any administrative boundaries. This enables a different spatial perspective with which to compare earlier ward level analysis with the specific difference that ward effects are dissociated from local effects.

We subdivided Tower Hamlets into 0.5km x 0.5km grid cells. We enumerated the total number of properties in each cell, the number of high risk HMOs and single family dwellings, and combined together the number of Noise and ASB incidents. We then analysed the incidence per property of ASB with the percentage of properties in each rented tenure type within each cell and mapped the results (Single family dwellings, HMOs or the whole PRS) and each class of major ASB category.

Our findings are presented in two maps shown in Figures 9 and 10. Each cell is coloured using a 'traffic light system'. Each cell is colour coded according to whether the concentration of ASB events per household is in the lower quartile of all cells (low risk, green), between the 25<sup>th</sup> and 75<sup>th</sup> percentile (medium risk, amber), or in the upper quartile range (high risk, red). Any un-shaded cells are those with too few private sector properties to make a valid assessment.

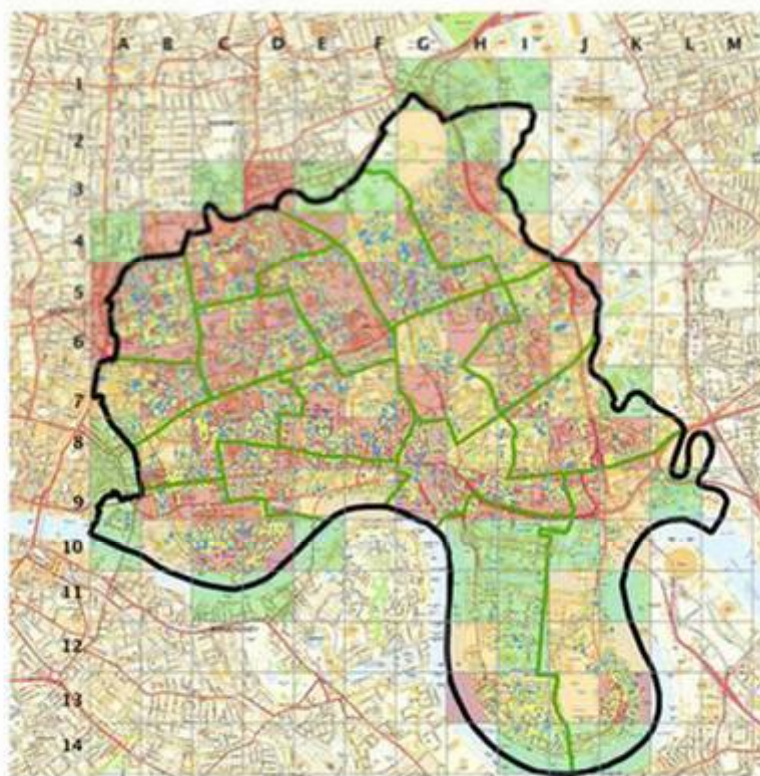
Both maps show a similar pattern as follows. Most red and amber cells concentrate in the north and central areas of the borough between rows 2 and 9. Amber as opposed to green cells predominates in the east central areas and red in the west central areas. Red cells in the east of the borough tend to be contiguous and span wards such as Weavers, Spitalfields and Banglatown, Bethnal Green North and South, Mile End and Globe Town.

A distinction can be drawn with cells in the south of the borough (below row 10) which are relatively unaffected by ASB apart from in three or four localised concentrations. The affected wards were identified in the previous as being high in terms of PRS but low in ASB and include Millwall, Blackwall and Cubitt Town, and St Katherine's and Wapping. However, what the cell level approach does not show very clearly is within-cell variations in ASB and PRS (e.g. a cell which is relatively low in ASB may have hotspots within it which are not apparent at this scale and nor at ward level).



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Figure 9: Map of noise incidents per property at 0.5 x 0.5 sq km cell level



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Figure 10: Map of ASB incidents per property at 0.5 x 0.5 sq km cell level

(b) Property level and hotspot analysis

Although it occurs in different concentrations we have shown that ASB is widespread in the borough. This is apparent for example when noise complaint data at household level are mapped. Figure 11 is a map of all residential properties in Tower Hamlets. Those coloured blue are properties that are located 10 metres or less from at least one noise incident occurring in the last three years; and those coloured grey are more than 10 metres from an incident.

There are 72k properties affected by ASB based on this definition and 46k that are not. The map shows that some neighbourhoods are more affected than others; for example, there is a greater concentration of ‘blue’ properties in the northwest corner covering cells A4 to D8 and a lesser concentration in other areas, but the map also shows that no area is completely immune from its effects

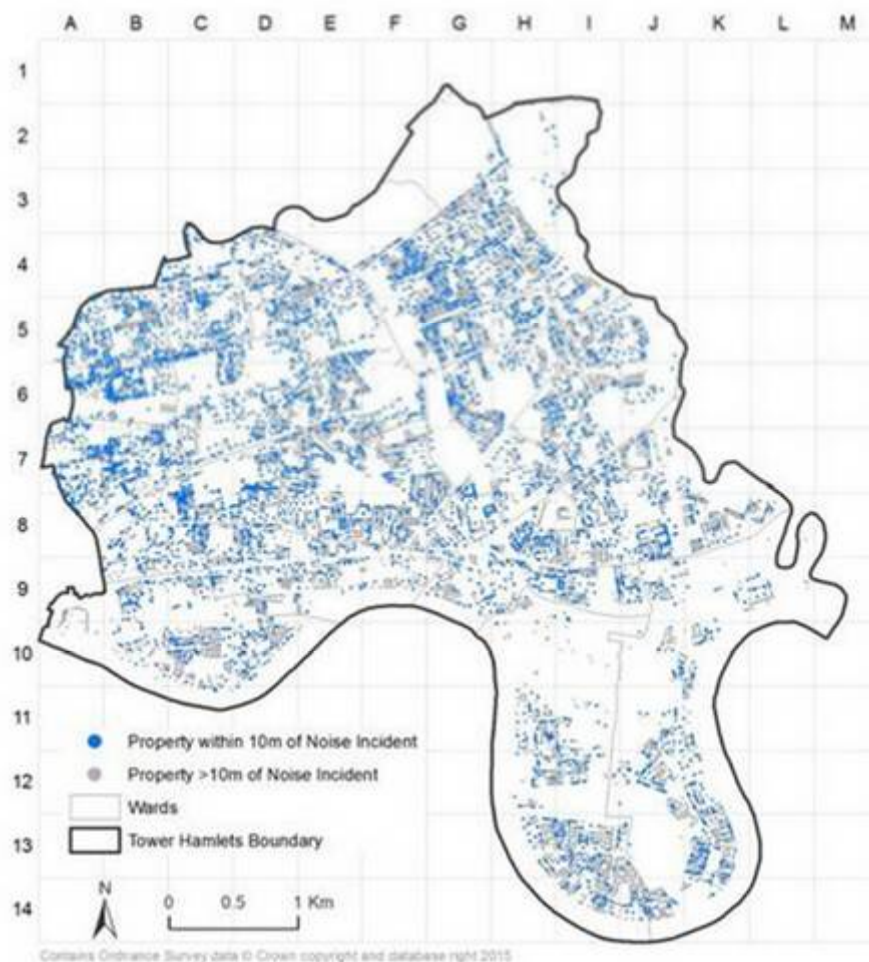


Figure 11: Property level map in which properties that are located within 50 metres of an ASB incident are colour coded blue

We have seen that where there are higher numbers of private rented properties, higher levels of ASB may be expected. Evidence of this is clearly visible from the Figures 12 and 13 which are contour maps based on the number of ASB incidents per square kilometre, in which it is seen that levels range from as low as 250 per square kilometre to nearly 4,000 per square kilometre (e.g. see cells A5 and A6) based on data over a three year period.

Overlaid on the maps is the density of HMOs and rented single family properties derived from our earlier analysis. It shows that the distribution of HMOs (Figure 12) and single family dwellings (Figure 13) is quite similar, thus making them hard to distinguish. It also shows that the correspondence between the PRS and ASB concentrations is quite marked albeit inexact (e.g. see cells B7 and B8, H4 I11, I13, and K10).

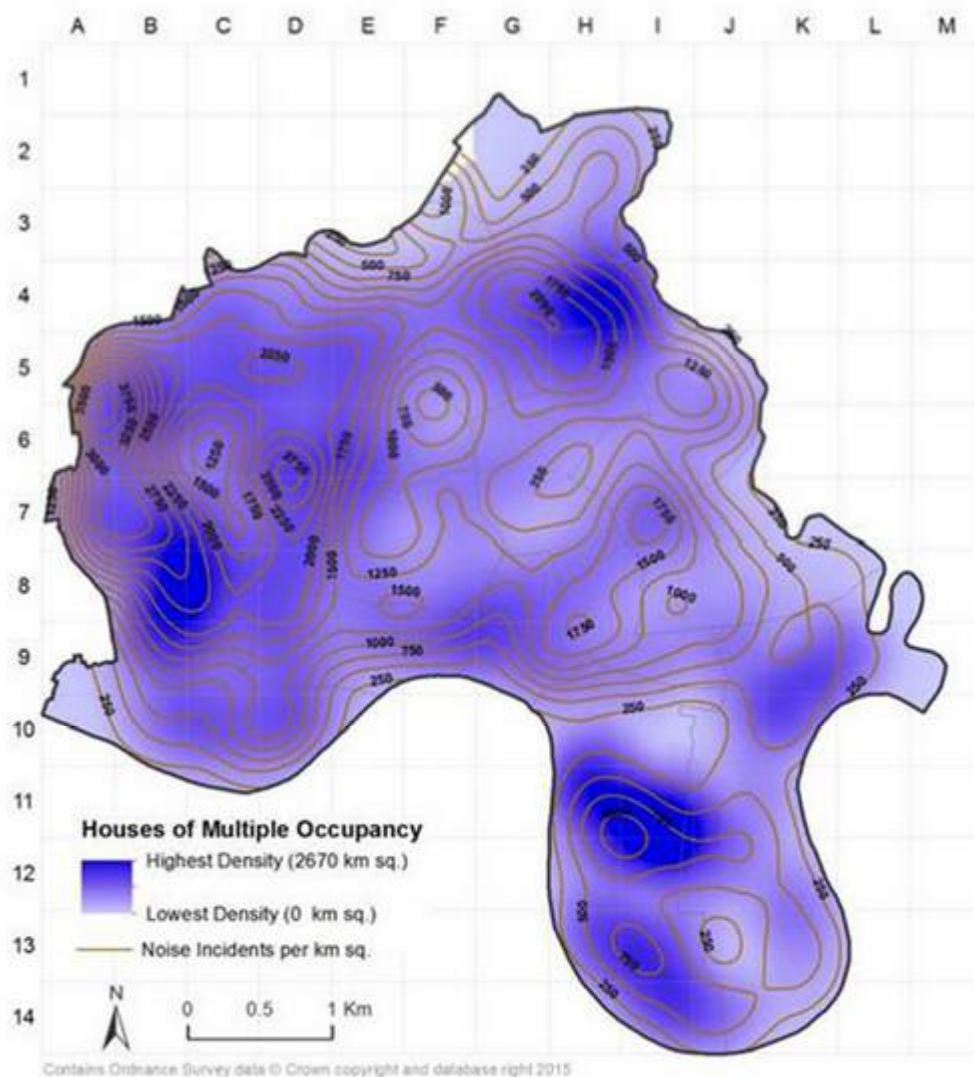


Figure 12: Map showing contours of address level noise in events per square kilometre compared with concentration of high risk HMOs

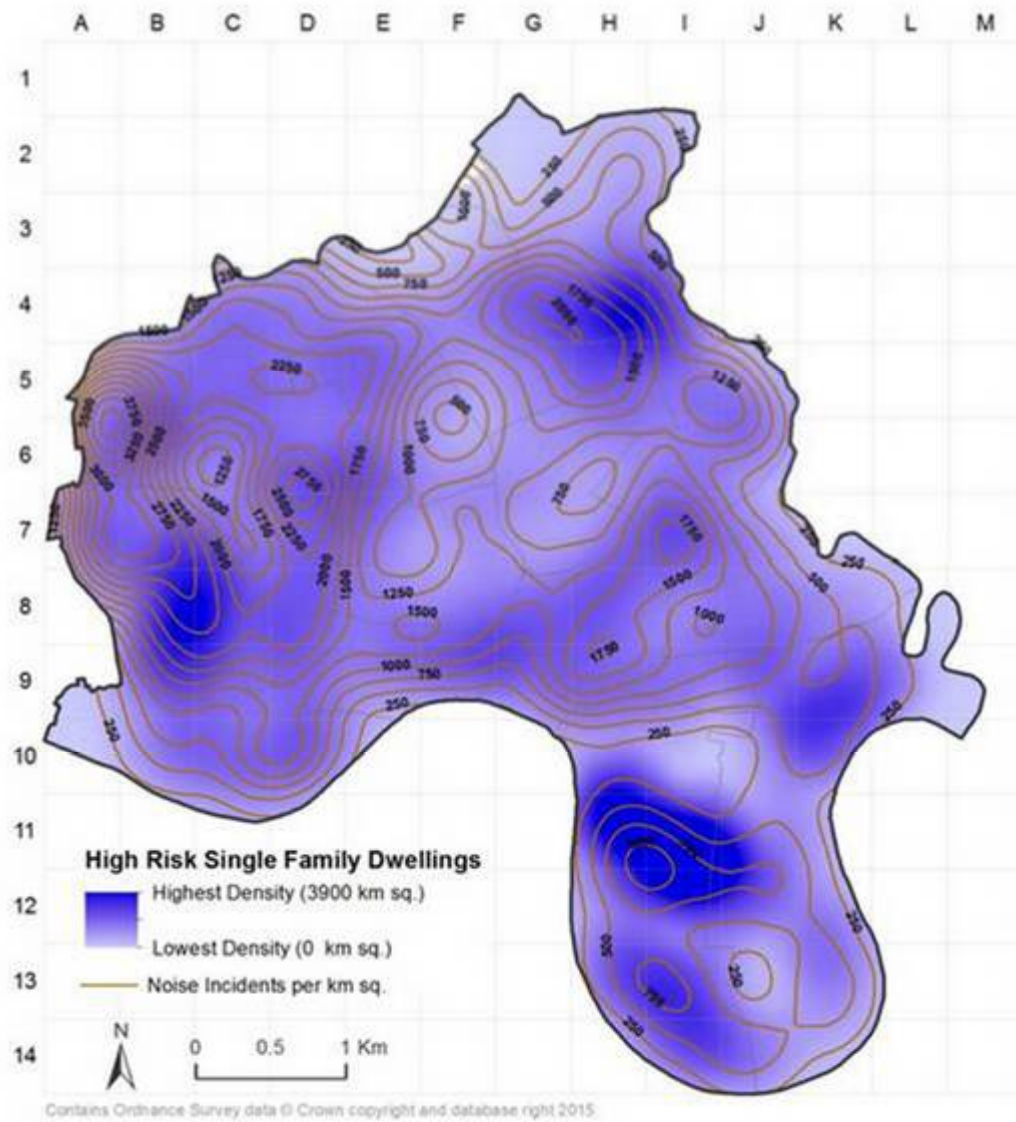


Figure 13: Map showing contours of address level noise in events per square kilometre compared with concentration of high risk rented single family dwelling HMOs

## **6. Conclusions**

The total number of identified high risk rental properties in the previous analysis gives an estimated size of the private rental sector of around 37,000 properties consisting of approximately 54% single family households and 46% HMOs. This estimate compares reasonably well with the total size of the PRS given in the 2011 Census of around 34,000 but is an upper bound for reasons given previously.

As part of the project we will provide Tower Hamlets with a database of all private sector properties providing the risk score of whether a property is more likely to be an HMO or single family rented property plus other attributes of each UPRN. If a licensing scheme is introduced this database can be compared with licence applicants and used appropriately to follow-up potential non-applicants.

As far as ASB is concerned we found that domestic noise complaints account for two thirds of all noise complaints and of these the most common complaint by far is loud music. Community safety data reveal that about one-third of all complaints are also noise related but other important headings were drug-related incidents and violent behaviour. Most categories of ASB were seasonally related, persistent and tended to be concentrated in the summer months.

This applied also to pest control incidents which were also very seasonal with summer peaks and winter troughs. In each of the previous cases average levels have been reasonably but one area of growth is housing complaints from tenants. Whilst these are low compared with other incident types and categories, their frequency has been increasing. This increase is probably related to the growth in the PRS and hence set to continue.

A key finding is that if we take all private properties as a group whether rented or not the incidence of all occurrences of ASB attributable to individual addresses is 9.9% in risk HMO categories for noise and 4.2% in the low risk categories. If we do the same for community safety reported ASB it is 3.1% and 1.9% and for pest control incidents 8.2 versus 5.2%. These levels are also higher than those seen in the social housing sector as explained below.

If we restrict our analysis to high risk suspected single family rented properties we find that the incidence of noise incidents is 7.3% as compared with 4.8% in the low risk categories – so it implies there is a similar effect as with HMOs but the disparity is smaller. This also applies to community safety reported ASB and to pest control and therefore seems to be a common finding as between private rented tenancy types.

In addition to the above, we find that 5.5% of all properties in the private sector and 6.4% in social housing are associated with one or more noise complaints and 1.9% of private properties and 2.5% of social housing two or more incidents. Social housing is also slightly higher among other markers to be prone to multiple events but the differences are not great.

On the other hand where a private property is associated with other risk factors the risk of ASB was increased relative to the social housing sector. In general however

we find that the whole rented sector accounts for proportionately more ASB than the owner-occupied sector.

Among the various risk factors the strongest predictor of community safety reported ASB is whether there have been noise complaints at an address. Other statistically significant risk factors were potential overcrowding at an address, eligibility for Housing Benefit, and housing complaints, but other useful markers were pest control incidents at the same address. Hence we can say that where a PRS property is badly maintained where these risk factors apply the levels of ASB are likely to be higher.

At the ward level we found that, using the hotspot analysis, the wards which contained both hotspots for ASB and PRS properties were mainly contained in Weavers, Spitalfields & BanglaTown., Whitechapel, Bow East, Bow West, Blackwall & Cubitt Town and Millwall. They all scored highly on ASB but their local concentrations of PRS properties are more variable in terms of tenancy mix.

Many of the wards in question are both small in area and contiguous. Hence it can be argued that introduction of licensing in one ward may not make sense if the problem straddles neighbouring wards or landlords shift their focus to an unlicensed neighbouring ward, as seems likely. Others e.g. in the south are much larger in area and the hotspots are confined to smaller areas within them and this problem is less applicable.

Because the private rented sector is widespread although concentrated more in some wards than others, a borough wide scheme could also be justified based on the general finding that the PRS is responsible for more ASB per property than owner occupied dwellings especially where there are other risk factors associated as listed above. However, the ward approach, linked to identifiable hotspots of private renting and ASB is both more targeted and practicable having regard to the councils logistical concerns about implementation.

In conclusion, the report has demonstrated a direct link between anti-social behaviour both at a property level and to a lesser extent at a ward level among private rented properties. Although the PRS and ASB coincide quite closely, the patterns do not nest easily into any particular ward configuration. The advantage of using hotspot mapping that it minimizes the arbitrariness of using pre-2014 ward boundaries.

One final but important point to note is that our results found roughly equal numbers of both HMOs and single family rented properties. The fact that the hotspots for both are almost identical suggests to us there is a case for a selective licensing scheme to be introduced rather than two separate schemes for additional and selective licensing.

*Mayhew Harper Associates Ltd.*  
*February 2015*

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Appendix Four: Tenure and percentages

Pre 2014 wards	% of Borough area	2011 census number of PRS	2011 census All tenures in grouped wards	% PRS against all tenures in grouped wards	% owner occupiers against all tenures in grouped wards	% social rented against all tenures in grouped wards	% PRS in grouped wards against all Borough (34,216)
Blackwall and Cubitt Town/Millwall	21.27%	9,067	19,475	46.6%	29.3%	24%	26.5%
Bow East and Bow West	16.24%	3,461	11,604	30%	29%	41.2%	10.1%
Spitalfields and Banglatown/Weavers/W hitechapel	11.81%	5,923	15,270	38.8%	24.5%	36%	17%

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Appendix Five  
Benefits of a Selective Licensing Scheme

<b>Benefits to the council</b>	<b>Benefits to Landlords</b>	<b>Benefits to communities</b>	<b>Benefits to tenants</b>
Landlords who have not responded to any previous measures such as registration schemes will be required to engage with Housing Enforcement Officers. Bad landlords will be forced to improve their practices or leave the market.	Responsible landlords will receive information and support	Increase housing demand and reduce antisocial behaviour will improve problems areas, making these areas safer and more desirable places to live.	More professional landlords should bring about improvements to the quality and management of property
Schemes should be easy to administer and explain as all private landlords in an area will be covered by a licensing scheme	A level playing field will be created, decent landlords will not be undercut by an unscrupulous minority	Reducing environmental costs and costs of crime, such as street cleaning and tackling fly tipping	Tenants could also see economic benefits, reduced heating costs and improved likelihood of regaining any deposit paid
The Council will gain extensive knowledge about private renting in part of the Borough. This will enable targeted enforcement and support to landlords	Poorly performing landlords will receive support and training to improve	Making it easier to involve landlords in wider strategies including crime reduction initiatives and local spatial strategies	Improvements to the neighbourhood would also benefit private tenants security and sense of community.
Landlords and their agents will be readily identifiable	Improved rental income	Protecting vulnerable groups who are often occupiers of privately rented accommodation which is poorly managed and	Better management practices would help to increase the length of tenure and reduce incidence of unplanned moves or homelessness.

		maintained	
The licence fee cover the costs of the scheme	Improve reputation of private landlords		
	Shorter void periods and reduce tenant turnover		
	Practical support and training around dealing with antisocial behaviour from tenants		

Source: Shelter, Selective licensing for local authorities, a good practice guide, 2006

## EQUALITY ANALYSIS QUALITY ASSURANCE CHECKLIST

<b>Name of 'proposal' and how has it been implemented</b> (proposal can be a policy, service, function, strategy, project, procedure, restructure/savings proposal)	<b>Licensing of the Private Rented Housing Sector</b>
<b>Directorate / Service</b>	<b>CLC / Safer communities</b>
<b>Lead Officer</b>	<b>David Tolley, Head of Consumer and Business Regulation</b>
<b>Signed Off By (inc date)</b>	
<b>Summary – to be completed at the end of completing the QA (using Appendix A)</b> (Please provide a summary of the findings of the Quality Assurance checklist. What has happened as a result of the QA? For example, based on the QA a Full EA will be undertaken or, based on the QA a Full EA will not be undertaken as due regard to the nine protected groups is embedded in the proposal and the proposal has low relevance to equalities)	<div style="display: flex; align-items: center; margin-bottom: 10px;"> <div style="width: 20px; height: 20px; background-color: #00b050; margin-right: 10px;"></div> <div><b>Proceed with implementation</b></div> </div> <p>As a result of performing the QA checklist, the policy does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p> <p>As the report identifies, equalities considerations will be reviewed as the project progresses.</p>

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Stage	Checklist Area / Question	Yes / No / Unsure	Comment (If the answer is no/unsure, please ask the question to the SPP Service Manager or nominated equality lead to clarify)
<b>1</b>	<b>Overview of Proposal</b>		
a	Are the outcomes of the proposals clear?	Yes	This report considers the outcome of the consultation process undertaken from 16 March 2015 till 12 July 2015, changes to legislation announced during the consultation and options

possible for the introduction of a housing licensing scheme for the private rented sector (PRS). A licensing scheme for PRS will enable the Council to impose a legal requirement, in the designated area, on all landlords to register, apply for a licence for each property they rent out, and comply with specific licence conditions thus giving the Council more power to tackle irresponsible letting of properties. Housing licensing schemes aim to improve standards of management in the PRS and reduce anti-social behaviour. CMT is asked to:

1. Agree that Cabinet should consider the evidence and the responses to the consultation and determine whether a selective licensing scheme should be introduced in part of the Borough.
2. Agree that Cabinet consider the extent of the scheme, considering the options available and the revised consideration that the scheme should be introduced within the following areas; Weavers, Whitechapel and Spitalfields and Bangla town (pre May 22<sup>nd</sup> 2014 ward boundaries)
3. Subject to 2. above, agree that the designation criteria for introducing Selective Licensing, as outlined in this report have been met.
4. Agree that Cabinet authorise the designation of a Selective Licensing area to cover the areas detailed in 2. above, to take affect at a date set by the Corporate Director of Communities Localities and Culture, once supporting technology is in place. That the designation will last for five years from that date.
5. Agree that Cabinet confirm that the authority to issue the required statutory notifications in relation to the Selective Licensing scheme designation is delegated to the Corporate Director of Communities Localities

			<p>and Culture.</p> <ol style="list-style-type: none"> <li>6. Agree that early applications can be accepted 3 months prior to the actual commencement of the designation.</li> <li>7. Agree that the fee structure and conditions proposed are adopted as part of scheme.</li> <li>8. Determine if any further exemptions considered, in addition to the statutory exemptions i.e. ANUK.</li> </ol> <p>Upon CMT's recommendations, MAB will consider the report.</p>
b	<p>Is it clear who will be or is likely to be affected by what is being proposed (inc service users and staff)? Is there information about the equality profile of those affected?</p>	Yes	<p>Appendix five (Benefits of a selective licensing scheme) identifies a number of benefits for the Council, landlords, communities and tenants. It is known that ASB is higher in PRS rather than social rented accommodation. A licensing scheme will provide positive impact on landlord, tenants and a wider community through supporting responsible PRS management and reducing ASB.</p> <p>Once a scheme is introduced, landlords will be asked to pay fees. The 2011 Census shows that PRS had grown by 135% since the previous census in 2001 in the Borough. It is expected that the number of PRS will continue increasing.</p> <p>The report asks to consider the scheme is introduced in the following areas: Weavers, Whitechapel and Spitalfields and Banglatown (pre 22 May 2014 ward boundaries). It is estimated that there are 5,923 PRS in the Weavers, Whitechapel and Spitalfields and Banglatown wards.</p> <ul style="list-style-type: none"> <li>• Weavers: 1,741(31% in the area)</li> <li>• Whitechapel: 2,578 (44%)</li> <li>• Spitalfields and Banglatown: 1,604 (41%).</li> </ul> <p>In the Borough, it is estimated that around 37,000 properties consisting of 54% single family households and 46% in</p>

			<p>House of Multiple Occupation (HMO).</p> <p>The breakdown of online consultation respondents were:</p> <ul style="list-style-type: none"> <li>• Businesses/service providers: 4</li> <li>• Landlords/Managing Agents/Agents (the majority were from individual landlords): 103</li> <li>• Tenants/residents: 92.</li> </ul> <p>The most respondents of the above were white males within the age group of 30-39.</p>
<b>2</b>	<b>Monitoring / Collecting Evidence / Data and Consultation</b>		
a	Is there reliable qualitative and quantitative data to support claims made about impacts?	Yes	See above.
	Is there sufficient evidence of local/regional/national research that can inform the analysis?	Yes	The service conducted a consultation from 16 March till 12 July 2015. The service also commissioned research on PRS and ASB (Appendix Three).
b	Has a reasonable attempt been made to ensure relevant knowledge and expertise (people, teams and partners) have been involved in the analysis?	Yes	See above.
c	Is there clear evidence of consultation with stakeholders and users from groups affected by the proposal?	Yes	<p>See 4.23-4.45 of the report.</p> <p>The consultation consisted of information about the scheme being placed online, accompanied with an online questionnaire, public meetings, letters sent out to ward Councillors, landlords, managing agents, adverts placed in local and neighbouring Boroughs newspapers and direct letters to landlord and tenant groups and neighbouring local authorities.</p> <p>The online questionnaire was aimed at three distinct groups; landlords/managing agents/agent – tenants/residents – businesses or service providers. The service received just fewer than 200 online submissions.</p>
<b>3</b>	<b>Assessing Impact and Analysis</b>		
a	Are there clear links between the sources of evidence	Yes	The service collected equalities data of the online



	(information, data etc) and the interpretation of impact amongst the nine protected characteristics?		consultation respondents. The responses from Landlords/ Managing Agents/ Agents and Tenants/Residents are analysed in the report.
b	Is there a clear understanding of the way in which proposals applied in the same way can have unequal impact on different groups?	Yes	The impact of a housing licensing scheme will be monitored.
<b>4</b>	<b>Mitigation and Improvement Action Plan</b>		
a	Is there an agreed action plan?	Yes	The report identifies steps following the approval of a designation (see 'Date of designation' in the report).
b	Have alternative options been explored	Yes	See 'Options' in the report.
<b>5</b>	<b>Quality Assurance and Monitoring</b>		
a	Are there arrangements in place to review or audit the implementation of the proposal?	Yes	Once the scheme is implemented, it will be monitored and reviewed.
b	Is it clear how the progress will be monitored to track impact across the protected characteristics??	Yes	The implementation of a housing licensing scheme will be monitored. ASB incidents will continue to be monitored.
<b>6</b>	<b>Reporting Outcomes and Action Plan</b>		
a	Does the executive summary contain sufficient information on the key findings arising from the assessment?	Yes	

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## **Appendix Seven**

### **Frequently Asked Questions**

#### **What is it?**

The Housing Act 2004 permits the council to introduce a scheme to licence landlords of private rented homes within designated areas of the borough where the area has:

- Low housing demand and/or
- A significant and persistent problem caused by anti-social behaviour.

The aim of the licensing scheme is to improve the management of these properties to ensure that they have a positive impact on the area.

#### **Why is the council considering this?**

The council feels that the introduction of such a licensing scheme in key areas will have an impact to:

- Address the significant and persistent problems of anti-social behaviour.
- To support the councils wider work around Housing, Homelessness, enviro-crime and dealing with housing management.
- To enable the council to target bad landlords and support good ones.
- Encourage landlords to deal with irresponsible tenants.
- For tenants to easily identify who is responsible for their home.

Research data shows that approximately one third of all the borough's property is in the private rented sector.

#### **How would it work?**

All private landlords with residential property within the proposed areas would need to apply for a licence for each property they let in the designated areas. The licence would come with certain conditions that would require the landlord to meet certain standards before they can legally rent out the property. In order to become a licence holder, they must pass a fit and proper persons test.

#### **Current mandatory licensing scheme for houses in multiple occupation**

All Houses in Multiple Occupation, in the borough, of three or more storeys in height and having five or more persons within at least two households must be licensed under the mandatory licensing requirement brought in by the Housing Act 2004.

Premises exempt from this mandatory licensing scheme includes those converted into self-contained flats where the requirements of Building Regulations 1991 have been met.

The proposed 'selective' licensing scheme will bring all privately rented properties into a licensing scheme within the designated areas.

## The benefits

The council can introduce a selective licensing scheme where it can demonstrate a link between the private rented sector and anti-social behaviour. It is envisaged that the scheme would benefit the local community and it would ensure that all private rented property within the designated area is managed to a satisfactory standard.

We would expect to achieve the following:

- Reduced anti-social behaviour
- More professional landlords
- Improvements in the quality and management of properties
- Reducing environmental costs – street cleansing and fly tipping
- Landlords and agent readily identifiable
- Protecting vulnerable groups within privately rented accommodation
- A mixed and vibrant community that people enjoy living in.

We recognise that many landlords provide decent, well-managed properties which do not cause any problems for the local community, we also recognise that there are poor management practices within the private sector which can have a negative effect on the area.

## Fees

It is proposed that the licences would run for a maximum of five years. Please view the [fee structure](#) (PDF 4kb).

## Current private rented housing standards

There are current private rented housing standards that apply to single let properties or [Houses in Multiple Occupation](#) (PDF 35kb). In addition there are [statutory management standards](#) (PDF 15kb) that apply to houses in multiple occupation.

## Licence conditions

There would be specific conditions attached to each licence issued which would relate to the management of the property. Several of the conditions would be mandatory, imposed by the Housing Act, which would include:

- A gas safety certificate to be provided to the council annually – if there is a gas supply
- Electrical appliances and furniture supplied by the landlord must be kept safe
- Smoke alarms to be installed in the property and maintained
- A tenancy agreement needs to be in place
- The licence holder to have references from prospective tenants.

In addition to mandatory conditions the council may attach local discretionary conditions. The set of discretionary [conditions](#) (PDF 25kb). These licence conditions would be monitored by the council to ensure that they were being complied with and we would be able to offer support and guidance to licence holders on how to comply with the conditions.

In addition tenants would be able to report issues to the council and we would then be able to request that the licence holder carries out relevant remedial works.

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## Appendix Eight

### Landlord Selective Licensing Scheme – Fees

Application type	Fee
Full on line application	£520 for five year licence
Partial on line application with documents sent through the post or all information not provided on first full application	£580 for five year licence
Postal application	£610 for five year licence
Postal application with all information not provided on first full application	£660 for five year licence
Landlords with previous management concerns or have required two warning letters to apply for a licence	Fees as above but licence will be valid for one year only
Application withdrawn by applicant, revocation, refusal by Council to licence, property ceases to require a licence	No refund
Temporary Exemption Notice	£30
Variation instigated by the licence holder	£30

Estimate of application fee costs (not included in original consultation)

### Calculation of Selective Licensing fee

Full application on line - £520 for 5 year licence

<b>Environmental Health Officer</b>	
Check officer case load Check online content and compliance of documents against HMO records. Update MAU on APP Check premise detail & history Calls & email admin to applicant Relevant searches Inspection letter Consult operating guidance doc. -----	3 hours
Inspection Download /label and link photo's Scan and attach inspection notes -----	6.00 hours
Consult LACORS documents Add additional conditions where required Consult LFB/ BC/ Planning Appropriate access notice Letter to landlord -----	6.00 hours

Monitor & update records at regular intervals Check compliance Administration & Sign off	3.00 hours
<b>Total:</b>	<b>18 hours</b>
<b>Technical Officer</b>	
Stage 1: Land registry Checking documents Checking/calculating fees are correct Input all data on Premises Database Mail merge	1 hour
Stage 2: Follow ups with applicant/EHO/CAD Visio Check with officers re: room numbers and locations as online apps seem to have that section missing Create licence add in conditions and cover letter, print, send off	1.5 hours
Stage 3: Check no objections have been made Update licencing section Issue Licence, follow up on time limited conditions Copy hard copy for file	1.5 hours
<b>Total:</b>	<b>4 hours</b>

Based on Officer time = 18 hours @ £25.75 = £463.50  
 Technical Officer time = 4 hours @ £15.13 = £60.52  
 Total ( 463.50 + 60.52) £523.75

Partial on line application with documents sent through the post or all information not provided on first full application - £580 for five year licence

<b>Environmental Health Officer</b>	
Check officer case load Check online content and compliance of documents against HMO records. Update MAU on APP Check premise detail & history Identify missing documents and review Calls & email admin to applicant Relevant searches Inspection letter Consult operating guidance doc.	4 hours
----- Inspection Download /label and link photo's Scan and attach inspection notes -----	6.00 hours



Consult LACORS documents Add additional conditions where required Consult LFB/ BC/ Planning Appropriate enforcement notice -----	6.00 hours
Letter to landlord Monitor & update records at regular intervals Check compliance Administration & Sign off	3.00 hours
<b>Total:</b>	<b>19 hours</b>
<b>Technical Officer</b>	
Stage 1: Land registry Checking documents Chase up documents Checking/calculating fees are correct Input all data on on Premises Database Scan and idox documents Mail merge	2 hours
Stage 2: Check/make follow ups with applicant/EHO/CAD Visio drawing Check with officers re: room numbers and locations as online apps seem to have that section missing Verify any new docs/check validity Check any extra requirements by officer Update premises update, obtain Officer's signature, create licence and cover letter, print, send off	2.5 hours
Stage 3: Check no objections have been made Update licencing section Issue Licence, follow up on time limited conditions Copy hard copy for file	1.5 hours
<b>Total:</b>	<b>6 hours</b>

Based on officer time 19 hours @ £25.75 = £489.25  
 Technical Officer time 6 hours @ £15.13 = £90.78  
 Total (489.25 + 90.78) = £580.00

Postal application - £610 for five year licence

<b>Environmental Health Officer</b>	
Check officer case load Check online content and compliance of documents against HMO records. Update records Identify missing docs and review Check premise detail & history Calls & email admin to applicant Relevant searches Inspection letter Consult operating guidance doc.	4 hours

----- Inspection Download /label and link photo's Scan and attach inspection notes -----	6.00 hours
Consult LACORS documents Add additional conditions where required Consult LFB/ BC/ Planning Email to LFB for approval response -----	6.00 hours
Letter to landlord Monitor & update records at regular intervals Check compliance Administration & Sign off	3.00 hours
<b>Total:</b>	<b>19 hours</b>
<b>Technical Officer</b>	
Stage 1: Land registry Checking documents Checking/calculating fees are correct Input all data on Premises Database Scan and idox documents Mail merge	4 hours
Stage 2: Check/make follow ups with applicant/officer Check any extra requirements by officer Cad/Visio drawing Update premises database, obtain Officer's signature, create licence and cover letter, print, send off	2.5 hours
Stage 3: Check no objections have been made Update licencing section Issue Licence, follow up on time limited conditions Copy hard copy for file	1.5 hours
<b>Total:</b>	<b>8 hours</b>

Based on officer time 19 hours @ £25.75 = £489.25  
 Technical Officer time 8 hours @ £15.13 = £121.04  
 Total (489.25 + 121.04) = £610.29

Postal application with all information not provided - £660 for five year licence

<b>Environmental Health Officer</b>	
Check officer case load Check online content and compliance of documents against HMO records. Update records Identify missing docs and review – contact applicant and chase up Check premise detail & history Calls & email admin to applicant Relevant searches	6.00 hours

Inspection letter Consult operating guidance doc. -----	6.00 hours
Inspection Download /label and link photo's Scan and attach inspection notes -----	6.00 hours
Consult LACORS documents Add additional conditions where required Consult LFB/ BC/ Planning Email to LFB for approval response -----	
Letter to landlord Monitor & update records at regular intervals Check compliance Administration & Sign off	3.00 hours
<b>Total:</b>	<b>21 hours</b>
<b>Technical Officer</b>	
Stage 1: Land registry Checking documents Identify missing docs and chase up Checking/calculating fees are correct Input all data on Premises Database Scan and idox documents Mail merge	4 hours
Stage 2: Check/make follow ups with applicant/officer Check any extra requirements by officer Cad/Visio drawing Update premises database, obtain Officer's signature, create licence and cover letter, print, send off	2.5 hours
Stage 3: Check no objections have been made Update licencing section Issue Licence, follow up on time limited conditions Copy hard copy for file	1.5 hours
<b>Total:</b>	<b>8 hours</b>

Based on officer time 21 hours @ £25.75 = £540.75  
 Technical Officer time 8 hours @ £15.13 = £121.04  
 Total (540.75 + 121.04) = £661.79

Temporary Exemption Notice £30

<b>Technical Officer</b>	
Checking documentation	30 minutes
Scanning and upload on to system	30 minutes
Cross Checking of applicant details	30 minutes
Correspondence	30 minutes
Total	2 hours

Based on Technical Officer time 2 hours @£15.13 = £30.26

Variation instigated by the licence holder £30

<b>Technical Officer</b>	
Checking documentation	30 minutes
Scanning and upload on to system	30 minutes
Cross Checking of applicant details	30 minutes
Correspondence	30 minutes
Total	2 hours

Based on Technical Officer time 2 hours @£15.13 = £30.26

These calculations do not include the cost of ICT support & development and set up for license application and payment of fees, officer training

## **Private Rented Housing Property Standards**

The proposed licence conditions that would be introduced with a selective landlord licensing scheme would complement the current property standards. These property standards are currently enforceable under Housing legislation and landlords must ensure that they currently comply.

Any application for a selective landlord licence will be reviewed to ensure that these standards are met.

### **The statutory overcrowding standard – single house holds**

There are two standards to assess whether a home is statutorily overcrowded. If either or both these standards are breached then a dwelling will be statutorily overcrowded.

#### **Room Standard**

A property is overcrowded where two or more persons, being ten or more years old and of opposite sexes have to sleep in the same room.

Unless those persons are over 16 years old and are married to each other or live together as husband and wife or in an equivalent relationship in the case of persons of the same sex.

For these purposes children under ten may be disregarded and a room means any room normally used as either a bedroom or a living room.

A kitchen can be considered to be a living room provided it is big enough to accommodate a bed.

#### **Space Standard**

This standard works by calculating the permitted number of people for a dwelling in one of two ways. The lower number calculated is the permitted number for the dwelling.

1) One test is based on the number of living rooms in the dwelling, disregarding rooms of less than 4.6 square meters (50 square feet)

One room = two persons

Two rooms = three persons

Three rooms = five persons

Four rooms = seven and a half persons

Five rooms or more = ten persons plus two for each room in excess of five rooms

A child below the age of one does not count and a child between the age of one and ten counts as a half person.

2) The other test is based on floor areas of each room size:

Less than 4.6 square meters (50 square feet) = no-one  
4.6 to 6.5 square meters (50 to less than 70 square feet) = half a person  
6.5 to 8.4 square meters (70 to less than 90 square feet) = one person  
8.4 to 10.2 square meters (90 to less than 110 square feet) = one and a half persons  
10.2 square meters (110 square feet) or larger = two persons

Note:

- **Communal space, hallways, corridors, landings, kitchens, W.Cs or bathrooms cannot be used as sleeping accommodation.**
- **Only persons under the age of 10 years old of the opposite sex may sleep in the same room, unless those persons are over 16 years old and are married to each other or live together as husband and wife (or in an equivalent relationship in the case of persons of the same sex)**

### **Specific Amenity Standards for Houses in Multiple Occupation**

A building is defined as a House in Multiple Occupation (HMO) if the following apply:

- Its is occupied as living accommodation
- By at least three people who belong to more than one family or household
- In accommodation that is not self-contained and
- Rent is paid by at least one of the occupiers and
- It is the occupiers only or main residence

Or

- It has been converted into self- contained flats and
- The conversion does not meet 1991 Building Regulations and less than 2/3 of the flats are owner –occupied

Self-contained flats within buildings that are HMOs may be occupied as HMOs themselves. The guidance applies to self-contained flats which meet this condition.

An individual tenancy may have exclusive use of the basic facilities (bath/shower, wc and kitchen), but the accommodation would only be defined as self-contained if the sleeping/living area and all the facilities are behind one door

## **Space Standards for Sleeping Accommodation**

In this guidance, a bedsit is defined as a room, or rooms, used for sleeping within a building, where some of the basic facilities for food preparation and hygiene are provided within the accommodation, or in a separate room and for the exclusive use of the occupiers of the bedsit.

A bedroom is a room within a building used for sleeping, and which does not contain any of the basic facilities. The facilities are either provided in separate rooms and are shared with other people living in the HMO, or are provided in separate rooms but for the exclusive use by the occupiers of the bedroom.

A maximum of two people are permitted to share a room for sleeping irrespective of age. If there are two occupiers, they must be living together as partners, family members or consenting friends. A room shared by more than two people is overcrowded, and may be subject to enforcement action by the local authority.

A room used for sleeping must not be shared by people of the opposite sex who are 10 and over, unless they are married or living together as husband and wife or in an equivalent relationship in the case of persons of the same sex.

When measuring the size of the room and assessing usable space, the shape of the room should be taken into account as well as the total floor area.

Space taken up by fitted units are counted in the floor area calculation, but chimney breasts, lobbies and en-suite bathroom or shower rooms are not. Rooms must have a minimum floor to ceiling height of at least 2.14 m over 75% of the floor area. Any floor area where the ceiling height is less than 1.53 m is disregarded.

The most recent advisory document from Greater London Authority recommends at least 2 cubic metres of storage in a room per person (for clothes and the like)

Number of occupiers	Room for sleeping Kitchen facilities in a separate room	Room for sleeping Kitchen facilities within the room
One	8.5 square meters	13 square meter
Two	13 square meters	18 square meters

Local housing conditions and policies vary between the boroughs and some may accept existing smaller rooms depending upon a risk assessment, and the communal living space available to the tenants within the HMO.

### **Living and dining rooms**

A landlord may provide a communal living room in addition to any space that is required for shared kitchen and dining facilities. As a guide, a communal

living room should be at least 13 square meters for 3 people, plus 1 square meters for every additional person. For example, a living room for 5 people should be 15 square meters.

If dining facilities are combined with the living room, the room should be at least 14 square meters for 3 people, plus 1 square meters for every additional person. For example, a combined living/dining room for 5 people should be 16 square meters.

### **Kitchen Facilities**

Kitchen facilities should be no more than one floor away from the letting. Where this is not practicable, a dining area of a size suitable for the number of occupiers should be provided on the same floor as, and close to, the kitchen. Kitchens must be of an adequate size and shape to enable safe use of food preparation by the number of occupiers and the following guidelines for shared kitchens apply:

Number of sharers	Room size
Up to 3	5.5 square meters
4-5	7.5 square meters
6-7	9.5 square meters
8-10	11.5 square meters

Where all or some of the lettings within the HMO do not contain cooking facilities, they must be provided for sharing with other households. There should be one full set of facilities per 5 persons, irrespective of age. Some flexibility may be considered in well-managed properties where there are 6 or 7 persons, subject to a risk assessment carried out by the local authority.

Where there are 8 – 10 persons, either an additional full set of cooking facilities must be provided, or additional facilities must be provided in an appropriate number of individual lettings where the room is large enough. If two sets of facilities are in the same room, each set must be separated and in distinct areas of the room.

A set of cooking facilities is comprised as follows:

Number of Occupiers	Facilities	Specifications
One	Cooker	In one-person bedsits only, a cooker with a 2-ring hob, oven and grill. Must be permanently and safely installed on a fixed worktop.
Up to 5		Four-ring hob, oven and grill.
6 - 7		Four-ring hob, oven and grill and an additional combined microwave oven and grill.



Up to 5 -----	Sink/drainer	1000 mm sink/drainer set on base unit, provided with a constant supply of hot and cold water and properly connected to the drainage system.
6 - 7		A double sink/drainer installed as above <u>or</u> A single sink/drainer plus a dishwasher.
One household -----	Worktop	1000 mm x 600 mm. Worktop must be fixed, and made of suitable impervious material.
Up to 5 -----		2000 mm x 600 mm provided and fitted as above
6 - 7		2000 mm x 600 mm provided and fitted as above, plus additional space for extra appliances.
All	Splashback	300 mm tiled splashback or its equivalent to be provided to the sink/drainer, worktop and any cooker without an integral splashback.
Up to 5 -----	Electrical sockets	One suitably located electrical socket for each dedicated appliance such as a cooker, refrigerator and washing machine. In addition, 4 sockets (in either double or single combinations) to be provided above the worktop.
6 - 7		An additional 2 sockets as above.
All	Floor covering	Impervious and washable floor covering to cover the floor area of the kitchen.
Per household	Food storage cupboard	One double wall cupboard or One single base cupboard. May be provided within individual lets. The base unit below the sink/drainer is not acceptable for food storage.
Per household -----	Refrigerator	Where provided in individual lettings, a small fridge freezer.
Up to 5 -----		Where provided in a shared kitchen, equivalent of 2 worktop height refrigerators both with freezer compartments, or 1 worktop height fridge and 1 worktop height freezer.
6 - 7		Where provided in a shared kitchen, the equivalent of an additional worktop height refrigerator with freezer compartment.

Kitchen facilities where provided in a bedsit should be sited remote from the entrance door.

The cooker should not be situated below a window.

A kitchen must not be the sole access to a room used for sleeping. Kitchen facilities must not be installed in a hallway.

A humidistat-controlled mechanical extractor must be provided where there is inadequate ventilation by means of a window. Newly converted kitchens must have a mechanical extractor regardless of whether there is an openable window.

Apart from an extractor hood, fixtures and fittings are not to be directly above cooking appliances.

Sufficient refuse storage to be provided adequate for the number of occupiers.

### **Personal washing and wc facilities**

Bathrooms and WCs should be within one floor of lettings, and where shared, must be accessible from a common area. WCs and bath/shower rooms must be fitted with a suitable and functioning lock and the surfaces must be impervious and readily cleansable.

Bath/shower rooms and WCs must be adequately ventilated, and bath and shower rooms must be adequately heated, such as by radiator, wall-mounted convection or fan heater, or underfloor heating. Electric bar heaters are not permitted. In new conversions, a mechanical extractor must be installed in addition to any openable window.

Where only one bathing facility is provided in the premises, it must be a bath with a suitable seal and a fixed overhead shower. A fixed shower rail and curtain must be installed.

Wash hand basins in each bedsit sleeping room are a required where practicable in houses with 5 or more occupiers, unless the room contains a sink/drainage.

Properties that are not bedsit accommodation may not require wash hand basin's in sleeping rooms at the discretion of the local authority.

The facilities must be adequate for the number of occupiers, and the following is a guide. External wc's are not counted.

Number of Occupiers	Facilities	Specifications
1-4	1 bath with wash hand basin  WC can be in bathroom	Standard size bath with 450 mm splashback Full-size wash hand basin with tiled splashback. Both to have constant supply of hot and cold water. If the WC is separate, it must have an additional wash hand basin & tiled splashback within the compartment.
5	1 bath with wash hand basin in room  1 wc with wash hand basin  1 wash hand basin in each sleeping room	Wc may be in the same room as the bath/ wash hand basin  wash hand basin's in bedsit rooms where practicable.
6-10	2 bathrooms with wash hand basins in each  One of bathrooms must contain bath, and the other a shower which may be fixed over-bath type  2 wc's, one in own compartment with wash hand basin  1 wash hand basin in each sleeping room	As above  wash hand basin's in bedsit rooms where practicable.

Where a shower cubicle is provided, it must be of a sufficient size that the user can bathe and dress without injury.

### **Fire Safety**

Fire safety standards to be based on the final edition of the Lacors Housing Fire Safety Guidance.

## **Heating**

Dwellings must have both effective insulation and efficient heating with reference to current energy efficiency requirements.

A fixed heating system must be provided to all lets. Radiators must be fitted with thermostatic valves. Fixed storage heaters are preferred where there is no gas supply.

## **Additional Considerations**

Compliance with these standards does not negate the need for compliance with other statutory provisions, including the Housing Act 2004 and supporting Regulations.

The following sources were consulted in producing this guide:

BRE Housing Design Handbook 1993  
Joint London Boroughs Code of Practice for Hostel Accommodation  
Residential Property Tribunal  
Local planning guidance  
Local development plan  
HMO licence applications  
London Borough HMO standards  
GLA Housing Space Standards  
Housing Act 2004

# Houses in Multiple Occupation - Management

## Management of Houses in Multiple Occupation

The Management of Houses in Multiple Occupation (England) Regulations 2006 impose a duty on any person managing a House in Multiple Occupation (HMO) to maintain a good standard of management. These pages set out the duties required under the Regulations.

The Council has a proactive inspection programme of HMOs. If conditions in the properties inspected are not up to standard, the landlord or owner is required to improve them.

These Regulations apply to all HMOs, whether or not they require a licence, but do not apply to buildings converted into self-contained flats.

However a similar set of regulations, The Licensing and Management of Houses in Multiple Occupation (additional Provisions) (England) Regulations 2007 do apply to converted blocks of flats, Whereas, these are buildings that have been converted and consist of self-contained flats where the building work undertaken in connection with the conversion did not comply with appropriate building standards and still does not comply with them and less than two-thirds of the self-contained flats are owner-occupied.

## Duty to provide information to occupier

The manager must ensure that:

- His name, address and telephone number(s) are made available to each household in the HMO
- Such details are clearly displayed in a prominent position in the HMO.

## Duty to take safety measures

1. The manager must ensure that all means of escape from fire in the HMO are:

- Kept free from obstruction
- Maintained in good order and repair

2. The manager must ensure that any fire-fighting equipment and fire alarms are maintained in good working order.

3. The manager must ensure that any fire escape notices are displayed in positions that are clearly visible to the occupiers.

4. The manager must take all reasonable measures to protect the occupiers from injury, having regard to the design, structural conditions and the number of occupiers in the HMO. In particular he must:

- Make safe or prevent access to any unsafe roof or balcony
- Provide bars or other safeguards to any windows with sills at or near floor level.

## **Duty to maintain water supply and drainage**

1. The manager must ensure that the water supply and drainage serving the HMO are maintained in good, clean and working condition. In particular he must ensure that:

- Any tanks and cisterns provided for storage of water are kept in a good, clean and working condition with a cover to keep the water in a clean and proper condition
- Water fittings are protected from frost damage

2. The manager must not unreasonably cause or permit the water supply or drainage to be interrupted.

## **Duty to supply and maintain gas and electricity**

1. The manager must supply to the local authority the latest Gas Safety Certificate in relation to the testing of any gas appliance by a Gas Safe registered engineer, within 7 days of receiving a written request.

2. The manager must:

- Ensure that every fixed electrical installation is inspected and tested by a qualified electrical engineer at not less than 5 year intervals
- Obtain a certificate from that person specifying the results of the test
- Supply that certificate to the local authority within 7 days of receiving a written request.

3. The manager must not unreasonably cause the gas or electricity supply to be interrupted.

## **Duty to maintain common parts, fixtures, fittings and appliances**

1. The manager must ensure that all common parts of the HMO are:

- Maintained in good and clean decorative repair
- Maintained in a safe and working condition
- Kept reasonably free from obstruction.

2. In particular the manager must ensure that:

- All handrails and banisters are kept in good repair
- Additional handrails or banisters are provided as necessary for the safety of the occupiers
- Any stair coverings are safely fixed and kept in good repair
- All windows and other means of ventilation within the common parts are kept in good repair
- The common parts are fitted with adequate light fittings that are available for use at all times
- Any fixtures, fittings and appliances used by two or more households within the HMO, other than those belonging to the occupiers, are maintained in good and safe repair and in good working order.

3. The manager must ensure that:

- Outbuildings, yards and forecourts used by two or more households are maintained in good order and clean condition
- Any garden belonging to the HMO is kept in a safe and tidy condition
- Boundary walls, fences and railings belonging to the HMO are maintained in good and safe repair so as not to constitute a danger to the occupiers.

## **Duty to maintain living accommodation**

1. The manager must ensure that each unit of living accommodation within the HMO and any furniture supplied with it are in clean condition at the beginning of a person's occupation of it.

2. The manager must ensure, in relation to any part of the HMO that is used as living accommodation, that:

- The internal structure is maintained in good repair
- Any fixtures, fittings and appliances are maintained in good repair and working order
- Every window and other means of ventilation are kept in good repair.

This duty does not apply to any repair required as a result of unreasonable conduct by the occupier and does not apply to furniture, fixtures, fittings and appliances belonging to the occupier.

## **Duty to provide waste disposal facilities**

The manager must:

- Ensure that sufficient bins are provided to each household occupying the HMO for the storage of refuse pending its disposal
- Make arrangements for the disposal of refuse and litter not ordinarily collected by the local authority.

## Duties of Residents

It is the duty of all residents of the property to ensure that the manager can effectively carry out his duties. All residents must:

- take care not to hinder in any way the manager in the performance of his duties
- allow the manager access, at all reasonable times, to any part of the accommodation so that he can carry out his duties
- provide the manager on request with any relevant information
- take reasonable care to avoid damaging anything which the manager is under obligation to keep in good repair
- comply with the arrangements made by the manager in respect of litter storage and disposal
- comply with the instructions of the manager in respect of any means of escape from fire, prevention of fire and the use of fire equipment.



**Selective Licence Conditions  
Tower Hamlets**

**1. Mandatory Management conditions**

1.1. The licence holder shall supply the occupiers of the property with a tenancy agreement/written statement detailing the terms of which they occupy it.

1.2. If gas is supplied to the property, the licence holder shall ensure that all gas installations and appliances are in a safe condition at all times. The licence holder must on request, provide the Council within 14 days, a valid gas safety certificate obtained in respect of the property within the last 12 months.

1.3. The licence holder shall ensure all works in relation to the gas appliances / installations are carried out by a Gas Safe registered engineer. Details of registered Gas Safe engineers can be found at [www.gassaferegister.co.uk](http://www.gassaferegister.co.uk)

1.4. The licence holder shall ensure that all electrical appliances provided in the property are in a safe condition.

1.5. The licence holder shall submit to the council on demand an electrical appliance test report in respect of any electrical appliances supplied by them. This report must be made available to the Council within 14 days.

1.6. The licence holder shall ensure that smoke alarms are installed in the property and keep them in proper working order. The licence holder will supply the Council, on application, with a declaration as to the condition and positioning of such alarms.

1.7. The licence holder shall ensure that any fire-fighting equipment and fire alarms are maintained in good working order. The licence holder must submit to the Council, for their inspection, a copy of all periodic inspection report/test certificates for any automatic fire alarm system, emergency lighting and fire-fighting equipment provided in the property. These must be provided to the Council within 14 days on demand.

1.8. The licence holder shall ensure that all furniture supplied by them in the property is in a safe condition. All upholstered furniture and covers and fillings of cushions and pillows should comply with current fire safety legislation. A declaration as to the safety of such furniture must be provided to the Council within 14 days on demand.

1.9. The licence holder must be a fit and proper person as per the definition under section 88 (3)(a) or (c) of the Housing Act 2004.

1.10. The licence holder shall obtain references from persons who wish to occupy a letting in the property before entering into any tenancy, licence or other agreement with them to occupy the accommodation. No new occupiers shall be allowed to occupy the accommodation if they are unable to provide a reference.

## **2. Tenancy Management**

2.1 The licence holder will provide their tenant(s) with written information, including any contact details, explaining how the tenant can make a complaint in relation to matters concerning their tenancy and how the licence holder will deal with such complaints, including the timescales for completion of repair works.

2.2 Details of the arrangements in place to deal with any complaints, repair issues and emergency issues and copies of the tenancy agreement shall be provided to the Council for inspection within 14 days upon demand.

2.3 The licence holder must protect any deposit taken under an assured short-hold tenancy scheme and provide the tenant with the relevant details regarding the statutory tenancy deposit scheme.

2.4 The licence holder and his representatives will ensure that the tenant's right to quiet enjoyment of the property is respected. Where entry is required to the property for the purpose of undertaking landlord duties and responsibilities, the licence holder will ensure that the tenant receives at least 24 hours written notice of intention to enter the property specifying the reason entry is required. Only in emergency situations such as flood, fire or potential threat to life should these requirements be waived.

2.5 The licence holder shall retain all references obtained for occupiers for the duration of this licence and provide copies to the Council within 14 days on demand.

2.6 Where window locks are fitted, the licence holder will ensure that keys capable of locking/unlocking the windows are provided.

## **3 Fit and proper person**

3.1 The licence holder must ensure that any persons involved with the management of the house must be a fit and proper person as per the definition under section 88 (3)(a) or (c) of the Housing Act 2004.

3.2 The Licence Holder or their Managing Agent must inform the Council within 14 days of any changes in their circumstances as follows:

- i) Details of any unspent convictions not previously disclosed to the local Council that may be relevant to the licence holder and/or the property manager and their fit and proper person status and in particular any such conviction in respect of any offence involving fraud or dishonesty, or violence or drugs or any offence listed in schedule 3 to the Sexual Offences Act 2003;
- ii) Details of any finding by a court or tribunal against the licence holder and/or the manager that he has practiced unlawful discrimination on grounds of sex, colour, race, ethnic or national origin, or disability in, or in connection with, the carrying on of any business;
- iii) Details of any contravention on the part of the licence holder or manager of any provision of any enactment relating to housing, public health, environmental health or landlord and tenant law which have led to civil or criminal proceedings resulting in a judgement or finding being made against him;

- iv) Information about any property the Licence Holder or manager owns or manages or has owned or managed which has been made subject to:
  - i. A control order under section 379 of the Housing Act 1985 in the five years preceding the date of the application; or
  - ii. Any enforcement action described under Part 1, Sections 5(2) or 7(2) of the Housing Act 2004 concerning Category 1 and Category 2 housing conditions hazards;
- v) Information about any property the Licence Holder or Manager owns or manages or has owned or managed in relation to which a Local Housing Authority has either refused to grant a licence under Parts 2 or 3 of the Act, or has revoked a licence;
- vi) Information about any property the Licence Holder or Manager owns or manages or has owned or managed that has been the subject of an interim or final management order under the Housing Act 2004;

#### **4 Anti-Social Behaviour**

4.1 The following arrangements shall be implemented to prevent or reduce anti-social behaviour.

The licence holder will provide their tenant(s) with written information, including the following;

- Name of the licence holder and manager,
- A contact address and daytime telephone number
- A 24 hour emergency contact telephone, number which should include out of hours response arrangement.
- Details for the disposal of rubbish and bulky waste.
- Any change in contact and/or telephone number details should be provided to tenants within 7 days of the changes being made.

4.2 The licence holder shall effectively address problems of anti-social behaviour resulting from the conduct on the part of occupiers of, or visitors to the premises by complying with the requirements of paragraphs (a) to (i) below:

(a) The Licence holder must not ignore or fail to take action, if he has received complaints of anti-social behaviour (ASB) that concern the visitors to or occupiers of the premises.

(b) Any letters, relating to anti-social behaviour, sent or received by the licence holder, or agent of the licence holder, must be kept for 3 years by the licence holder.

(c) The licence holder must ensure that written notes are kept of any meetings or telephone conversations or investigations regarding anti-social behaviour for 3 years.

(d) If a complaint is received, or anti-social behaviour is discovered, the licence holder must contact the tenant within 14 days. The tenant must be informed of the allegations of the anti-social behaviour in writing and of the consequences of its continuation.

(e) The licence holder shall from the date of receipt of the complaint of anti-social behaviour, monitor any allegations of anti-social behaviour and whether it is continuing.

(f) Where the anti-social behaviour is continuing after 28 days from receipt of the complaint, the licence holder, or his agent must within 7 days visit the premises and provide the tenant with a warning letter advising them of the possibility of eviction.

(g) Where the licence holder or his agent has reason to believe that the anti-social behaviour involves criminal activity the licence holder shall ensure that the appropriate authorities are informed.

(h) If after 14 days of giving a warning letter the tenant has taken no steps to address the anti-social behaviour and it is continuing the licence holder shall take formal steps under the written statement of terms for occupation, e.g. the tenancy agreement or licence and which shall include promptly taking any legal proceedings to address the anti-social behaviour

(i) Where the licence holder is specifically invited they shall attend any case conferences or multiagency meetings arranged by the Council or police.

Any correspondence, letters and records referred to in (a) to (i) above must be provided to the Council within 14 days on demand.

## **5 Property Management**

5.1. The licence holder must provide on demand to the Council an Electrical Installation Report or electrical installation certificate carried out by a suitably qualified electrical contractor who should be registered/member of an approved body such as NICEIC, NAPIT etc. or registered to undertake electrical works in accordance with Part P of the Building Regulations. Such reports should not be more than 5 years old. Electrical contractors that are on a relevant competent person scheme can be found at [www.competentperson.co.uk](http://www.competentperson.co.uk)

5.2 Should the electrical Installation report specify the installation to be unsatisfactory then the licence holder must ensure that the works deemed requiring urgent attention to bring the installation up to a satisfactory condition are completed within 28 days.

5.3 Where the licence holder becomes aware of a pest problem or infestation at the property he shall take steps to ensure that a treatment program is carried out to eradicate the pest infestation. Records shall be kept of such treatment programs and these must be provided to the Council within 14 days on demand.

5.4 The licence holder shall ensure that inspections of the property are carried out a minimum of every 6 months to identify any problems relating to the condition and management of the property. The records of such inspections shall be kept for the duration of this licence. The records must contain a log of who carried out the inspection, date and time of inspection and issues found and action(s) taken. Copies of these must be provided to the Council within 14 days on demand

5.5 The licence holder must be resident in the United Kingdom.

5.6 The licence holder shall ensure that, as far as is reasonably practicable, the exterior of the property and boundary walls, fences and gates are kept free from graffiti.

## 9. General

9.1 The licence holder shall arrange for access to be granted at any reasonable time and must not obstruct any Council Officer(s) carrying out their statutory duties including the surveying of the property to ensure compliance with licence conditions and any relevant legislation.

9.2 The licence holder shall, if required, by written notice within 14 days provide the Council with following particulars as may be specified in the notice with respect to the occupancy of the house:

- i) The names and numbers of individuals/households accommodated specifying the rooms they occupy within the property.
- ii) Number of individuals in each household.

9.3 The licence holder shall inform the Council of any change in ownership or management of the house and

- i) Change in Manager, address and contact telephone number
- ii) Change of address of Licence Holder or Landlord and contact telephone number;
- iii) An appointment of a manager, their address and contact number

The undertaking of any substantial works to the property including conversions and modernisations that would affect the licence or licence conditions

9.4 The licence holder shall ensure that whilst any alteration or construction works are in progress, the work is carried out to ensure the safety to all persons occupying or visiting the premises.

9.5 The licence holder must advise the Council's Property Licensing Team in writing of any proposed changes to the construction, layout or amenity provision of the house that would affect the licence or licence conditions.

9.6 The licence holder and/or manager may be required to attend an accredited property management training course. One such course is run by the London Landlord Accreditation Scheme and for information on this scheme refer to: [www.londonlandlords.org.uk](http://www.londonlandlords.org.uk)

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**National Landlords Association:**

*Response to Tower Hamlets Council proposal for Selective Licensing*

*July 2015*

## **Introduction:**

1. The National Landlords Association (NLA) exists to protect and promote the interests of private residential landlords.
2. The NLA represents more than 50,000 individual landlords from around the United Kingdom; we provide a comprehensive range of benefits and services to our members and strive to raise standards within the private rented sector.
3. The NLA seeks a fair legislative and regulatory environment for the private rented sector while aiming to ensure that landlords are aware of their statutory rights and responsibilities.
4. The National Landlords Association (NLA) would like to thank Tower Hamlets Council for providing the opportunity to comment on the Selective Licensing consultation.

## **Executive Summary:**

5. Having considered the evidence presented and undertaken its own evaluation of the circumstances faced by the residents of Tower Hamlets the NLA's position can be summarised by the following brief points:
  - While there is evidence to suggest that ASB is not satisfactorily dealt with in the area, no such data has been provided linking the issues to the PRS.
  - Landlords have very limited authority to deal with matters of ASB.
  - Discretionary licensing is not an appropriate reaction to the cited issues as it provides no further facility or powers to deal with ASB.
  - The consultation paper fails to provide sufficient evidence to support claims made to justify the associated application.
  - The documentation provided also fails to indicate that sufficient funding will be available to support the functions necessary to support licensing.
  - There are a large number of unanswered questions posed by the Council's proposals.
6. The NLA contends that the flaws outlined below in the process and proposals must be rectified prior to making any attempt to progress this application. Furthermore, once the necessary data has been identified and provided this consultation exercise should be repeated, ensuring engagement with all relevant stakeholders. We are also concerned around whether the scheme is in breach of the government's 20% threshold.



### General Feedback on Proposals:

7. The ability to introduce Licensing is a powerful tool. If used correctly by Tower Hamlets Council it could resolve specific issues. The NLA has supported many local authorities when the introduction of a licensing scheme has been introduced, as it will benefit landlords, tenants and the community.
8. The legislation in relation to Selective Licensing clearly states that the introduction of licensing has to be evidence based. On the basis of the evidence that is presented by the council the NLA would argue that there is no case for the introduction of licensing as proposed.
9. The NLA believes that any regulation of the private rented sector needs to be balanced. Additional regulatory burdens must focus on increasing the professionalism of landlords, the quality of private rented stock and driving out the criminal landlords – who blight the sector. It should be the shared objectives of all parties involved to facilitate the best possible outcomes for landlords and tenants and as such good practice should be recognised and encouraged in addition to the required focus on enforcement activity. In light of the current economic climate. The last thing good landlords need is regulations or licensing schemes; particularly where there appears to be limited direct and immediate benefit to landlords or tenants.
10. The housing market suffered a collapse in 2007. This has meant that many who bought houses prior to the collapse could be subject to negative equity, thus preventing them from selling. Consequently renting the property out is the only option, if they have to move due to their job<sup>1</sup>. Low interest rates have supported many people, during the banking crisis that hit UK housing market. An increasing in running costs courtesy of the Council's licensing fees is not only inappropriate, but could be a hammer blow to those at the lower end of the economic scale as costs will be passed through.
11. Tower hamlets Council has many existing powers. Section 57 (4) of the Housing Act 2004 states that a local authority "must not make a particular designation ... unless (a) they have considered whether there are any other courses of action available to them ... that might provide an effective method of dealing with the problem or problems in question". The use of these powers as listed below give a Tower hamlets Council the ability to tackle many of the issues that they wish to overcome in all the parts of the city:
  - a) Use of Criminal Behaviour Orders;
  - b) Crime Prevention Injunctions;
  - c) Interim Management Orders;
  - d) Empty Dwelling Management Orders;
  - e) Issuing improvement notices to homes that don't meet the decent homes standard
  - f) Directions regarding the disposal of waste (for example under section 46 of the Environmental Protection Act 1990);
  - g) Litter abatement notices under section 92 of the Environmental Protection Act 1990;

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<sup>1</sup> <http://www.independent.co.uk/money/mortgages/millions-face-becoming-mortgage-prisoners-as-rise-in-interest-rates-could-trap-to-23m-homeowners-9399137.html>

- h) Powers under the Noise Act 1996 to serve fixed penalty notices or confiscate equipment (sections 8 and 10);
- i) The power to require rubbish to be removed from land under section 2 – 4 of the Prevention of Damage by Pests Act 1949.

12. The paperwork of a license can be reduced; the rationalisation of processing of licensing forms needs a review. The requirement to complete a form for each property needs to be simplified for landlords with multiple properties. The process can be simplified along with costs that are incurred by Tower Hamlets Council and to the landlord. We would be willing to work with the Council on how this can be done.
13. One of the many reasons raised by Tower hamlets Council for the introduction of Selective Licensing is the impact of litter and fly-tipping. Landlords will outline to tenants at the start of the tenancy their obligations in relation to waste and what they have to do to comply with in relation to waste disposal. This in many cases this is the waste services provided by Tower hamlets Council, if the tenant does not comply with the waste collection then the tenant is responsible and the Council can take action against them directly – licensing is not the appropriate response to address this issue
14. The aims of the Council has i.e. removing nuisance, ASB, waste etc. can be achieved through existing legislation that Licensing will not and cannot achieve. The risk of introducing Licensing is likely to increase the costs for those who live in Tower Hamlets, along with not resolving the problems that the Council wishes to resolve. Thus a more erudite approach to dealing with nuisance and a separate policy to tackle the criminal landlords would be more applicable in resolving the issues.

**Negative Impacts of Discretionary Licensing:**

15. One of the dangers of the proposed Selective Licensing scheme could be the costs are passed through to tenants, thus increasing cost for those who rent in Tower Hamlets, along with the cost of the Council. Thus increasing costs to Tower Hamlets residents, especially the most vulnerable and least able to tolerate a marginal increase in their cost of living.
16. Areas that have been subject to the introduction of Selective Licensing have seen lenders withdraw mortgage products, reducing the options to landlords reliant on finance. Downstream this increases landlords' overheads and subsequently costs for tenants rise. The consultation documentation does not appear to reference this possibility or invite contributions from financial institutions. As affected stakeholders this would appear unwise and potentially damaging to the application process and scheme implementation?
17. Tower Hamlets Council, by proposing the introduction of licensing is implying that there are social problems, which could deter investment in the area. However, there is no acknowledgement of the impact that the stigmatisation of discretionary licensing is likely to have on the effected locality. This should be explored and detailed in the evidence case supporting this application. Once again the

NLA would assert that failure to provide such information is an indication of a substandard and ultimately superficial consultation exercise.

### **Resources**

18. The introduction of Selective Licensing is not a solution in itself; resources need to be allocated by Tower Hamlets Council as well. Experience indicates that other councils, which have introduced licensing schemes that have not allocated the adequate resources to resolve the problems, still suffer those very same problems. We have reservations with the proposals as no new resources have been identified and would recommend the Council consult a range of third party authorities which have considered, implemented and rejected licensing proposals in order to obtain a better overview of the requirements.
19. Often cited as an example to other authorities, Newham Council has spent over £4 million on additional staff, which has resulted in a prosecution rate of 1% of landlords. However, while the London Borough has registered over 20,500 landlords, it has so far only banned 18, and prosecuted 243. A targeted approach such as those adopted by Leeds and Manchester would be better value for the taxpayer. How much money has been allocated from the general fund to cover costs of the introduction of the licensing scheme?
20. Often when tenants near the end of the contract/tenancy and they are moving out they will dispose of excess waste in a variety of methods, this does include putting it out on the street for the council to collect. A waste strategy for the collection of excess waste at the end of tenancies needs to be considered by local authorities with a large number of PRS properties. This is made worse when councils will not allow landlords to access the municipal waste collection points. The Council does not have a strategy in place to tackle the problem of waste from housing that is rented out and appropriate waste collection bins provided for the accommodation. The NLA would be willing to work with the Council in developing this strategy.
21. The costs of enforcement may not be recouped, raising the question of what resources the council intends to allocate to support the objectives of this licensing proposal should be addressed.

### **Current Law**

22. There are currently over 100 pieces of legislation that a landlord has to comply with. The laws that the private rented sector has to comply with can be misunderstood. A landlord is expected to give the tenant a "quiet enjoyment", failure to do so could result in harassment case brought against the landlord. Thus the law that landlords have to operate within is not fully compatible with the aims that the Council wish. A landlord keeping a record of a tenant can be interpreted as harassment.
23. The introduction of licensing is to tackle specific issues, many of these are tenant related and not to do with the property/landlord. Thus the challenge is for local authorities to work with all the people involved not to just blame one group – landlords. The NLA is willing to work in partnership with the Council and can help with tenant information packs, assured short hold tenancies, green deal and accreditation of landlords, along with targeting the worst properties in an area.

24. The NLA would also argue that a problem encompassing a few poorly managed and/or maintained properties would not be appropriately tackled by a licensing scheme, which is not proportional. In many situations the Council should consider Enforcement Notices and Management Orders. The use of such orders will deliver results immediately – why does the Council wish to do this over five years. A targeted approach on a street-by-street approach, targeting the specific issues and joined up between agencies, the Council, community groups, tenants and landlords will have a greater impact.
25. The NLA agrees that some landlords, most often due to ignorance rather than criminal intent, do not manage their properties effectively. A more appropriate response would be to identify issues and assist landlords to develop the required knowledge and skills to improve the sector through schemes such as the NLA Accredited Landlord Scheme. This can allow Tower Hamlets Council to target the criminal Landlords – a joint approach is required.
26. The NLA would also like to see Tower Hamlets Council to develop a strategy that can also include action against any tenants that are persistent offenders. These measures represent a targeted approach to specific issues, rather than a blanket-licensing scheme that would adversely affect the professional landlords and tenant whilst still leaving the criminal able to operate under the radar.

**Consultation Critique:**

27. Although central government approval is no longer a pre-requisite for implementation of a discretionary licensing scheme, a threshold of 20% is set. The NLA has grave concerns about this consultation process, the evidence upon which it is based and therefore the ability of third parties to properly contribute. The following paragraphs outline these concerns and potential flaws.
28. In relation to ASB the authority a landlord has to tackle such activity within their properties, it should be pointed out that landlords and agents can only enforce a contract. They cannot manage behaviour (ref: House of Commons briefing note SN/SP 264 paragraph 1.1). In most circumstances, the only remedy available to landlords confronted with cases of serious ASB in one of their properties will be to seek vacant possession and in many instances will serve a section 21 notice rather than a section 8 notice identifying the grounds for possession. The former is simpler and cheaper and repossession (at present) more certain. No reason needs be given for serving a section 21 notice and the perpetrator tenant can then hypothetically approach the local authority for assistance to be re-housed (ref: Homelessness Guidelines cl 8.2). Crucially, no affected party need offer evidence against an antisocial householder, reducing the risk of intimidation, harassment and ultimately unsuccessful possession claims. The issue of ASB will thus not appear as a factor in the repossession. In providing evidence to support a licensing application the document should clarify for respondents the position of all relevant under landlord and tenant law.
29. At no point in the document does the Council illustrate their argument for Selective Licensing with examples of cases where a landlord has refused to engage with authorities after being approached and made aware that there is an issue to be investigated in relation to their tenants. In this respect the Council has relied purely on a quantitative statistical approach inferring significant correlation. It is submitted that this approach is wholly inappropriate for the consultation process as it does not

empower participants to give truly informed responses. We would therefore contend that the required consultation process is irrevocably faulty.

30. It is also worrying how little reference to the economic impact of increasing the cost of housing provision will have on the local community. We wish to understand how the Council believes increasing said costs would increase demand. The logic of this assertion is not clearly explained and will arguably lead to incorrect conclusions on the part of those stakeholders relying on the Council to inform their input into this consultation. This at a time with a further reduction in benefits.
31. In the Government procedural document - 'Approval steps for Additional and Selective Licensing Designation in England', it states that in order to apply for Selective Licensing a local housing authority *"will have to show how such a designation will be part of the overall strategic borough wide approach, and how it fits with existing policies on Homelessness, Empty homes, Regeneration and Anti-social behaviour."* These should be made public as a matter of urgency, with reference to the funding available for each policy strand.
32. This condition is also highlighted in the 'Explanatory note to Housing Act 2004, paras 26-28', which states: *"In order for a scheme to be approved, such a Selective Licensing scheme must be shown to be co-ordinated with an authority's wider strategies to deal with anti-social behaviour and regeneration."*

**Requests for Supplementary Information:**

33. The Council claims that one of the benefits to landlords is – "Support for landlords when dealing with anti-social tenants". It would be useful if this could be expanded, what help, when and how?
34. You also make the claim that the introduction of Selective Licensing will take the tension out of the landlord tenant relationship. Can you provide the evidence?
35. The NLA would like to understand the Council's reasoning on how charging people more to live in rented accommodation will improve housing? Given that successive governments have attempted to address the issue of anti-social behaviour, using significant resources to underpin structural causes, it seems unreasonable to contend that licensing of private property will succeed. Could the Council provide evidence to support this assumption?
36. At a time when Tower Hamlets Council is reducing department budgets, we believe that the remaining resources should be allocated to targeted enforcement against the worst, criminal landlords. How many additional staff will Tower hamlets be employing and how much additional resources has the council budgeted for per year over the next five years?
37. Leeds City Council through the process of introducing Selective Licensing incurred a cost of around £100k to the tax payers of Leeds<sup>2</sup>. Thanet Council incurred a cost of £500,000.00. Newham has

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<sup>2</sup> <http://www.publications.parliament.uk/pa/cm201314/cmselect/cmcomloc/50/5006.htm#a13>

allocated money from the general fund for enforcement and received money from central government, how much money has the Council envisaged will be required for these new services?

38. In Newham and other Councils which have cited similar cases, additional staff have been required, how many additional staff is the Council proposing to employ?
39. Clarification on the Council's policy, in relation to helping landlords when a Section 21 notice is served is required, with the proposed Selective Licensing scheme? It would be useful if the council could put in place a guidance document before the introduction of the scheme which would outline the council's position in helping landlords remove tenants who are causing anti-social behaviour.
40. The NLA would like further explanation on how the Council will work with landlords to mitigate the tenants that leave a property early but where they still have a tenancy. If a landlord has problems with a tenant, how will the Council help the landlord?
41. Licensing can perform a role, but licensing in itself will not resolve issues; the use of enforcement where the law is being broken is required. This requires an allocation of resources; can the Council provide a breakdown of resources they will be allocating for the five year period of the license?
42. With the requirement for formal referencing ahead of new delays are likely for prospective tenants, along with the inevitable difficulty some people will have getting a tenancy. Could you provide the equalities and diversity assessment that the Council has undertaken into referencing? What communication has the Council had with RSL's concerning the provision of referencing, including social housing providers that neighbour Tower Hamlets? Also how have neighbouring Councils reacted in response to the proposed requirement to provide references?
43. What provision is there for people who are first time renters who will not be able to get a reference to access decent housing? Will the Council undertake to fill the supply gap created by private landlords complying with licensing requirements?
44. Waste is a common issues associated with licensing proposals and ASB. In many situations fly-tipping or excessive litter is a result of the tenant not understanding the waste service. The non-collection of waste/recycling by the Council can increase fly-tipping and litter in an area. The non-collection of recycling due to contamination within the recycling bin will result in the tenant having to dispose of the recycling/waste; this can lead to fly-tipping or overflowing bins/litter. Neither of these can be resolved through licensing. What additional resources will the Council allocate to resolve this issue as there is no indication provided that the current resources will prove adequate?
45. Could the Council provide a breakdown of the ASB? Could this also be sub divided into ASB that is proven to be housing related?

## TH Landlord Licensing Scheme Consultation Response

### On Behalf of TH Renters and TH Unite Community Centre

#### Intro

TH Renters and TH Unite Community fully support plans to license landlords in Tower Hamlets. We believe a comprehensive scheme that covers ALL private landlords (within the legislation) combined with a pro-active licensing inspectorate that works closely with the environmental health team could benefit thousands of private renters across the borough as well as providing a level playing field for landlords operating within it.

However, there are a number of concerns with the current proposals. Firstly that given the changes to legislation in March 2015, there will be difficulties in extending selective licensing to more than 20% of the borough and may prove impossible under the current government. Secondly, there are concerns that Selective Licensing scheme may not cover all residential landlords – non-mandatory HMOs and single households – due to the wording of the legislation and so could be challenged in court.

Given the uncertainties with both, we feel strongly that Additional licensing should be implemented alongside Selective Licensing as it faces no restrictions in reach, requires no permission and would limit the opportunity for legal challenge.

#### The Private Renting Landscape

Private renters are suffering on a number of levels. High and ever-increasing rents are the biggest problem, but with increased demand poor and unsafe conditions are compounded by either amateur, lazy or callous landlords, who fail to maintain their properties and are known to evict tenants if they complain. In fact the fear of eviction - as well as not knowing their rights - encourages tenants not to complain or report matters to the council.

Of course licensing will not cure all of the problems renters face, but, if implemented properly and with enthusiasm, it will – with time – go some way to improving and maintaining minimum standards that are already legislated for, but which local authorities have largely failed to enforce, whether due to a lack of funding or a laissez-faire approach.

#### How Licensing can help

**Knowing the landscape:** the council will be able to compile a list of every property that is privately rented out in Tower hamlets and the landlords that own or manage them. This will provide a channel of communication for the council to educate both landlords and tenants of their rights and responsibilities.

**Immediate improvements:** Conscientious landlords will immediately seek to address any issues in their properties and thus improving standards for many renters without a tenant complaining or a council enforcing.

An issue for councils operating a licensing scheme can be establishing which properties are being

managed unprofessionally. Beyond random inspections the best way is to educate tenants of their rights and how to enforce them. Sending information packs to every privately rented household would be an important first step followed by adverts at bus-stops highlighting key rights and responsibilities of tenants and landlords. Advertising through local community centres, groups and libraries would also help.

### Concerns with licensing scheme

**Everyone's rights asserted and protected:** Many people do not engage with local affairs whether they're born and raised in England or have recently arrived from abroad speaking little or no English. A concerted initial and ongoing effort to engage with all private renters to inform them of their rights is essential including accessing hard-to-reach groups through established community, social and cultural groups and centres. This may best be done by training activists, volunteers and staff from such groups.

**UKBA:** There have been serious concerns over the joint raids carried out in Newham between council officers and the UKBA. TH Renters was encouraged to hear this would not happen in Tower Hamlets. UKBA's association with licensing could undermine the scheme for migrants who are often the most likely to be taken advantage of by callous landlords and thus living in sub-standard conditions. Whether they are documented or not migrants would be unlikely to call the council to report poor or unsafe conditions if they fear arrest.

**References:** it should be made clear that references landlords must get from new tenants need not be from a previous landlord. A reference from a doctor, employer or similar is adequate. This prevents landlords from making life difficult for former tenants following any dispute.

**Pro-active Inspections:** we believe a pro-active approach to inspecting properties should be followed focusing on older properties and those that are not licensed. This would encourage landlords to ensure properties meet the legal standards as well as allowing inspections solicited by tenants to be passed off as random to help protect them from any adverse reaction by the landlord.

**Unintended consequences:** local authorities already running licensing schemes have found an increase in harassment and illegal evictions since operating the scheme. It is important the law around this area is made clear to both tenants and landlords and supat port in place to prosecute landlords where appropriate. A leaflet explaining the law and a tenant's rights should be left at households following inspections.

**Housing team:** Given the money a borough-wide scheme would bring in and the pressures and lack of resources the existing housing environmental health team face, we would hope a team of full-time inspectors were employed that could benefit both departments: licensing and environmental health. We would also hope that prosecutions by the environmental health team could also be funded by licensing income. I was informed that Tower Hamlets Council only prosecuted eight landlords last year due to a lack of money.

**Council letting agency:** once the licensing scheme is up and running we feel the idea of a council letting agency should be explored (Hackney Council has set-up one, although with unsurprisingly limited success due to poor marketing and a lack of interest). However, sub-standard properties



that landlords say they cannot afford to renovate or bring up to standard could be taken over by the council on long leases, pay for the work to be done out of a fund from licensing income and rented out. The council would be repaid from the rental income. Once up-and-running empty properties could also be targeted. Once the agency was established it could then market itself as an ethical letting agent, and as a non-profit could offer better value to both landlords and tenants than high street letting agents in terms of fees, commission and length of tenancies.

**Overcrowding:** as we know overcrowding is a problem in Tower Hamlets, but much of it due to the lack of affordable housing in the borough rather than landlords taking advantage of their tenants as is sometimes the case. We would hope the council would recognise the choice of some families to live in overcrowded conditions rather than be split up from their families and communities.

**24hrs notice:** as has already been stated setting up a licensing scheme provides an opportunity to educate both landlords and their tenants. One issue that repeatedly comes up with private renters we speak to is unannounced visits. While many tenants know this is morally wrong they are unaware it is illegal. We would welcome and encourage the council to highlight this to both tenants and landlords.

**Fit and proper person test:** we hope that every landlord that is brought to the council's attention is checked out to ensure they are a fit-and-proper person. Eventually we would hope every landlord is checked.

**Annual newsletters:** we believe a lot of problems in the PRS are down to both landlords and tenants being unaware of their rights and responsibilities. While electronic contact details for landlords or agents should be established through licensing, tenants are more difficult to contact not least because of their often transient nature. We feel an annual newsletter delivered to every property that is – or the council believes should be – licensed to inform tenants of their rights, how to report any concerns and any changes in the law would help tenants assert their rights and help councils target the properties where there are problems.

**Selective AND Additional:** The problems of not introducing additional licensing alongside selective could be considerable and not worth the risk for little additional effort. With only 20% of properties guaranteed to be licensed – assuming 100% sign-up – some 32,000 households would miss out on the benefits the scheme affords. From a business and landlord perspective the level playing field they usually demand would be absent. And the council would have 80% less income with presumably a similar outlay. This would likely seriously impact on the council's ability to run the scheme effectively; inspecting properties quickly following a complaint and enforcing and prosecuting where appropriate. The success of the scheme, we believe, will ultimately be based on landlords knowing that an effective scheme is in place that is easier to comply with than not.

### Myth-buster

Some of the claims as to why licensing should not be introduced from landlords and their representatives have been astonishing. Equally astonishing has been the failure to take them apart.

1. **Licensing will drive rogue landlords further underground:** what does that mean exactly? A property cannot go 'underground'. The person taking the rent should easily be traceable. And ultimately councils can simply take over the property if necessary.
2. **Tenants most likely to be exploited are the least likely to complain.** This is why tenants

should not be targeted – for example, with UKBA – during inspections or raids so they feel safe to report concerns to the council. However, it is not knowing their rights and the fear of eviction (S21) that are the main reasons tenants don't complain. Licensing would help to address both of these as the right to administer a S21 would be revoked if the property is unlicensed or in breach of the license conditions, and be better informed from leaflets delivered to properties in the PRS.

3. **Questions as to how the council will extract fines from the landlord.** Where a landlord cannot pay a fine or improve the property it can be taken over by the council and if set up, passed onto the council letting agency to manage, bring up to standard and rent out repay any debt/costs in the process.
4. **Claims the additional bureaucracy would put off decent new landlords entering the market.** A good landlord would surely fully support a scheme that ensures minimum standards. For many landlords the letting agent would take care of the paperwork.
5. **Claims the cost of licensing and administration would put up rents driving tenants into hands of unlicensed landlords.** The nominal charge of £100 a year should have no effect on the rent and what administration costs? Use the council letting scheme if your letting agent is ripping you off. The other costs would be if the property fails the current minimum legal standards and thus letting it illegally.
6. **Risk of landlords challenging scheme.** The landlord would need to prove the Council acted beyond its powers or follow the correct procedures as happened in Enfield, so all care must be taken to avoid this. However, there are concerns the duty to license could be challenged if only Selective Licensing is implemented with it's definition being unclear if it covers non-mandatory HMOs.
7. **Decent landlords are being punished and that new ones will be put off entering the market?** Why would a £100 a year fee and ensuring their property meets minimum standards while their property increases by many thousands of pounds a year and the mortgage paid off for them is put them off? If so, the market is better off without them. Alternatively it is not true and is a scare tactic.

Furthermore, if landlords were put off from entering the market, what would this actually mean?

1. There would be less demand for properties for sale reducing inflationary pressures making it more affordable for people to buy homes to live in.
  2. Someone who could cope with the £100 a year and ensure minimum standards would buy the property instead and rent it out.
  3. A landlord would decide to sell the property increasing supply.
  4. It could be argued that those without mortgages or who could afford to - might leave the properties empty instead. This is where at the very least council tax on empty properties should be levied at the highest possible rate.
8. **Rents will increase due to an increase in owner-occupiers as landlords sell up.** This is possible, and adds to the need to build more social housing. However, this is unlikely as the licensing burden is trivial when compared to the benefits to a landlord as mentioned above.

There is a chance rents could increase where landlords are forced to significantly improve their properties, but will of course be limited by market rate presuming they were charging below this before any enforcement.

Appendix Fourteen

Written Submissions

Individual/ Organisation	Summary of submission	Main points raised
Greystar	Requesting exemption for organisations that are part of ANUK	ANUK: national code for accrediting standards in the private rented sector. Already go through an accreditation standard so should be exempt
Private Landlord	Requesting exemption for organisations that are part of ANUK	As above
Private Landlord	Against the proposal	Current laws are extensive and need to be used
Private Landlord	Against the proposal	<ul style="list-style-type: none"> <li>• Not enough evidence to link ASB from the private rented sector</li> <li>• Landlord should not pay for soothing that will benefit they whole community</li> <li>• Alternatives need to be considered</li> <li>• All landlord do not make a profit</li> <li>• Landlords may sell property</li> <li>• Pass the cost to the tenant</li> <li>• How will the fees be spent</li> </ul>
Private Landlord	Against the proposal	<ul style="list-style-type: none"> <li>• Red tape and stealth tax</li> <li>• Good landlords will shoulder the cost</li> <li>• Will not solve the problems outlined in the consultation</li> <li>• Sufficient laws in place</li> </ul>
Private	Against the proposal	<ul style="list-style-type: none"> <li>• Consultation was biased against the private rented sector</li> </ul>

Landlord		<ul style="list-style-type: none"><li>• Evidence is lacking and assumptions made</li><li>• What will the fee be spent on</li><li>• Powers already exist to deal with the issues</li><li>• Will only affect the good landlords</li></ul>

## Appendix 15

### General Questions asked at the selective licensing public consultation meetings and responses

How much is the licence and where does the money go? – on the administration of the scheme

Why the particular 7 wards were chosen, what research was done? – answer after researching ASB, noise complaints, fly tipping, inspections in response to rented property disrepair complaints etc. along with the hot spot maps, the areas were determined.

When will scheme be implemented? – reviewed and determined by Cabinet.

If the owners daughter lives at the property and rents out some rooms to lodgers does it need a licence? - Depending on the situation this is likely to be exempt.

The ASB link cannot be directly linked to the private rented sector. There are hostels for the homeless in some of the areas selected, impact of the night time economy not considered ( nuisance is from the visitors to late night establishments) – the Mayhew associate reports plots inferences on the property types compared to the various datasets the council holds to come up with a probability ratio.

The Council does not know where the landlords are- licensing would rectify this; the onus is landlords to apply for a licence. Publicity will be made available in the relevant areas.

Landlords may reduce the numbers of properties for rent – the licence fee is approximately £100 per year, it is not felt this would be a consequence of licensing.

Does not address short term lets i.e. Air bnb – no, it will not in all cases.

Have other options been considered, what else are the Council doing to reduce ASB? – yes in the consultation document, it part of an overall strategy

Why should landlords pay for a public benefit – they may be adding to the stresses in an area.

Landlords – expressed concern over the cost – running a business does incur some costs

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## Landlord licencing scheme consultation

### Consulting on a selective licencing scheme for the private rented housing sector

The council is considering introducing a selective licencing scheme for private landlords renting properties to tenants. The proposed licensed areas are Blackwall and Cubitt Town, Bow East, Bow West, Millwall, Spitalfields & Banglatown, Weavers and Whitechapel. Before introducing this scheme we are consulting all relevant stakeholders to ensure that we consider your views and, if the scheme is implemented, it is done in the most effective way. We want to use selective licencing to tackle anti-social behaviour, deal with housing standards and to assist in improving the overall management of rented accommodation. We welcome your views, please complete the following questionnaire.

We are legally required to be able to notify you of the outcome of this consultation.

Would you like us to contact you via email or postal address? \*

Email

Address

Are you a \*

Landlord / managing agent / agent

Private tenant, Tower Hamlets resident, Resident outside Tower Hamlets

Business or service provider



Are you a landlord, agent or managing agent?

- In which of these areas do you own or manage properties?
- Blackwall and Cubitt Town
  - Bow East
  - Bow West
  - Millwall
  - Spitalfields & Banglatown
  - Weavers
  - Whitechapel
  - Other

How many properties do you own or manage in these areas?

Do you own or manage property in any other areas of Tower Hamlets?  Yes  No

- In the last 12 months have you encountered any of the following problems regarding your property?
- Difficulty finding new tenants
  - Difficulty obtaining references for new tenants
  - Anti-social behaviour by tenants
  - Problems evicting tenants
  - Poor property conditions
  - Problems with neighbouring properties affecting your property / tenants
  - Other

Please specify:

Thinking about the area (s) where you have property, how much of a problem are the following on a scale of 0 – 10, with 10 being the highest problem and 0 being not an issue.

- Loud noise:
- Neglected, run down properties:
- Nuisance from parking / adequacy of street parking:
- Nuisance from neighbours:
- Littering:
- People not treating others with consideration:
- Rubbish dumping / fly and street tipping:
- Large gatherings on the streets:

Are there any other problems in the area(s) where you have property?





Have you been a victim or witness to any anti-social behaviour in any of the areas detailed (Blackwall and Cubitt Town, Bow East, Bow West, Millwall, Spitalfields & Banglatown, Weavers and Whitechapel)?  Yes  No

Are you aware of any anti-social behaviour being caused by your tenants in areas detailed (Blackwall and Cubitt Town, Bow East, Bow West, Millwall, Spitalfields & Banglatown, Weavers and Whitechapel)?  Yes  No  I don't know

In your experience as a landlord have you had problems with your tenants for any of the following reasons?

- Rent arrears
- Damage to your property
- Tipping of rubbish
- Complaints from neighbours

Do you request references from prospective tenants?  Yes  No

What is the demand for your properties?

The council can choose to require landlords to obtain a licence before they can rent out properties. This gives us more knowledge of who the landlords are and encourages the improvement of management standards and give support to landlords. This is called selective licencing.

Would you support the introduction of selective licencing in:

Blackwall and Cubitt Town	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> I don't know
Bow East	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> I don't know
Bow West	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> I don't know
Millwall	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> I don't know
Spitalfields & Banglatown	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> I don't know
Weavers	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> I don't know
Whitechapel	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> I don't know



### About you

Please complete the equalities monitoring form below to help us make sure that services are accessed equally and fairly. The information which you provide on the form will be kept confidential in accordance with the Data Protection Act 1998.

#### Gender

- Are you:  Female  
 Male  
 Prefer not to say

#### Ethnicity

Are you:

- Asian  Bangladeshi  
 Chinese  
 Indian  
 Pakistani  
 Vietnamese  
 Other

- Black  Caribbean  
 Somali  
 Other

- White  English  
 Irish  
 Scottish  
 Welsh  
 Other

- Mixed/dual heritage  White & Asian  
 White & Black African  
 White & Black Caribbean  
 Other

#### Disability

Under the Disability Discrimination Act 1995 a person is considered to have a disability if he/she has a physical or mental impairment which has a sustained and long-term adverse effect on his/her ability to carry out normal day to day activities.

- Do you consider yourself to be a disabled person?  No  
 Yes  
 Prefer not to say

If yes, what is the nature of your disability?

#### Sexual orientation

- How would you define your sexual orientation?  Bisexual  
 Gay  
 Heterosexual  
 Lesbian  
 Other  
 Prefer not to say

#### Age

- Choose one of the following age bands  16 or under  
 19-19  
 20-29  
 30-39  
 40-49  
 50-59  
 60-74



## Landlord licencing scheme consultation

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We are legally required to be able to notify you of the outcome of this consultation.

Would you like us to contact you via email or postal address? \*

Email

Address

Are you a \*

Landlord / managing agent / agent

Private tenant, Tower Hamlets resident, Resident outside Tower Hamlets

Business or service provider



Do you have a business or provide a service in one of the following areas?

What type of business do you have?

Do you own / rent your business premises?

Do you have more than one business in Tower Hamlets?  Yes  No

Thinking about the area where you have your business in/cr provide a service in, how much of a problem are the following on a scale of 0 – 10, with 10 being the highest problem and 0 being not an issue.

Loud noise:

Neglected, run down properties:

Nuisance from parking / adequacy of street parking:

Nuisance from neighbours:

Littering:

People not treating others with consideration:

Rubbish dumping / fly and street tipping:

Large gatherings on the streets:

Are there any other problems in the area where you have your business?



Do you feel safe undertaking your activities in the defined areas (Blackwall and Cubitt Town, Bow East, Bow West, Milwall, Spitalfields & Banglatown, Weavers, and Whitechapel) around it?

Yes  No

Have you ever been a victim or witnessed any anti-social behaviour in any of the defined areas (Blackwall and Cubitt Town, Bow East, Bow West, Milwall, Spitalfields & Banglatown, Weavers, and Whitechapel)?

Yes  No

Have you experienced any anti-social behaviour from tenants in privately rented properties in any of the defined areas?

Yes  No

Do you think that all landlords in the area generally keep their properties in a good standard?

Yes  No  I don't know

Would you say that landlords in the defined area where you have your business (Blackwall and Cubitt Town, Bow East, Bow West, Milwall, Spitalfields & Banglatown, Weavers, and Whitechapel), are good responsible landlords?

Please Select ...

The council can chose to make landlords obtain a licence before they can rent out properties. This gives the council more knowledge of who the landlords are and encourages landlords to deal with anti-social behaviour. This is called selective licencing.

Do you support the introduction of selective licencing in:

- Blackwall and Cubitt Town  Yes  No  I don't know
- Bow East  Yes  No  I don't know
- Bow West  Yes  No  I don't know
- Milwall  Yes  No  I don't know
- Spitalfields & Banglatown  Yes  No  I don't know
- Weavers  Yes  No  I don't know
- Whitechapel  Yes  No  I don't know



**About you**

Please complete the equalities monitoring form below to help us make sure that services are accessed equally and fairly. The information which you provide on the form will be kept confidential in accordance with the Data Protection Act 1998.

**Gender**

- Are you:  Female  
 Male  
 Prefer not to say

**Ethnicity**

Are you:

- Asian**  Bangladeshi  
 Chinese  
 Indian  
 Pakistani  
 Vietnamese  
 Other
- Black**  Caribbean  
 Somali  
 Other
- White**  English  
 Irish  
 Scottish  
 Welsh  
 Other
- Mixed/dual heritage**  White & Asian  
 White & Black African  
 White & Black Caribbean  
 Other

**Disability**

Under the Disability Discrimination Act 1995 a person is considered to have a disability if he/she has a physical or mental impairment which has a sustained and long-term adverse effect on his/her ability to carry out normal day to day activities.

- Do you consider yourself to be a disabled person?  No  
 Yes  
 Prefer not to say

If yes, what is the nature of your disability?

**Sexual orientation**

- How would you define your sexual orientation?  Bisexual  
 Gay  
 Heterosexual  
 Lesbian  
 Other  
 Prefer not to say

**Age**

- Choose one of the following age bands  16 or under  
 19-19  
 20-29  
 30-39  
 40-49  
 50-59  
 60-74



## Landlord licencing scheme consultation

### Consulting on a selective licencing scheme for the private rented housing sector

The council is considering introducing a selective licencing scheme for private landlords renting properties to tenants. The proposed licensed areas are Blackwall and Cubitt Town, Bow East, Bow West, Millwall, Spitalfields & Banglatown, Weavers and Whitechapel. Before introducing this scheme we are consulting all relevant stakeholders to ensure that we consider your views and, if the scheme is implemented, it is done in the most effective way. We want to use selective licencing to tackle anti-social behaviour, deal with housing standards and to assist in improving the overall management of rented accommodation. We welcome your views, please complete the following questionnaire.

We are legally required to be able to notify you of the outcome of this consultation.

Would you like us to contact you via email or postal address? \*

Email

Address

Email: \*

Are you a \*

Landlord / managing agent / agent

Private tenant, Tower Hamlets resident, Resident outside Tower Hamlets

Business or service provider



Are you a tenant in private rented accommodation?  Yes  No

Which area do you live in?

How long have you lived in your current property?

Thinking about the area you live in, how much of a problem are the following on a scale of 0 – 10, with 10 being the highest problem and 0 being not an issue.

Loud noise:

Neglected, run down properties:

Nuisance from parking / adequacy of street parking:

Nuisance from neighbours:

Littering:

People not treating others with consideration:

Rubbish dumping / fly and street tipping:

Large gatherings on the streets:

Are there any other problems in the area you live in?





Do you feel safe in your home and the area around it?  Yes  No

Have you been a victim or witnessed any anti-social behaviour in your area?  Yes  No

Thinking about properties in your area owned by private landlords, have you experienced or witnessed anti-social behaviour from tenants from these properties?  Yes  No

Thinking about properties in your area owned by private landlords, do you think the owner's maintain the properties to a good standard?  Yes  No

Overall, would you say that private landlords in your area act responsibly in letting, managing and maintaining their properties?

Do you think private landlords take any action against tenants who cause a nuisance or anti-social behaviour?  Yes  No  I don't know

The council can chose to make landlords obtain a licence before they can rent out properties. This gives the council more knowledge of who the landlords are and encourages landlords to deal with anti-social behaviour. This is called selective licencing.

Would you support the introduction of selective licencing in:

Blackwall and Cubitt Town  Yes  No  I don't know

Bow East  Yes  No  I don't know

Bow West  Yes  No  I don't know

Milwall  Yes  No  I don't know

Spitalfields & Banglatown  Yes  No  I don't know

Weavers  Yes  No  I don't know

Whitechapel  Yes  No  I don't know



**About you**

Please complete the equalities monitoring form below to help us make sure that services are accessed equally and fairly. The information which you provide on the form will be kept confidential in accordance with the Data Protection Act 1998.

**Gender**

- Are you:  Female  
 Male  
 Prefer not to say

**Ethnicity**

Are you:

- Asian  Bangladeshi  
 Chinese  
 Indian  
 Pakistani  
 Vietnamese  
 Other
- Black  Caribbean  
 Somali  
 Other
- White  English  
 Irish  
 Scottish  
 Welsh  
 Other
- Mixed/dual heritage  White & Asian  
 White & Black African  
 White & Black Caribbean  
 Other

**Disability**

Under the Disability Discrimination Act 1995 a person is considered to have a disability if he/she has a physical or mental impairment which has a sustained and long-term adverse effect on his/her ability to carry out normal day to day activities.

- Do you consider yourself to be a disabled person?  No  
 Yes  
 Prefer not to say

If yes, what is the nature of your disability?

**Sexual orientation**

- How would you define your sexual orientation?  Bisexual  
 Gay  
 Heterosexual  
 Lesbian  
 Other  
 Prefer not to say

**Age**

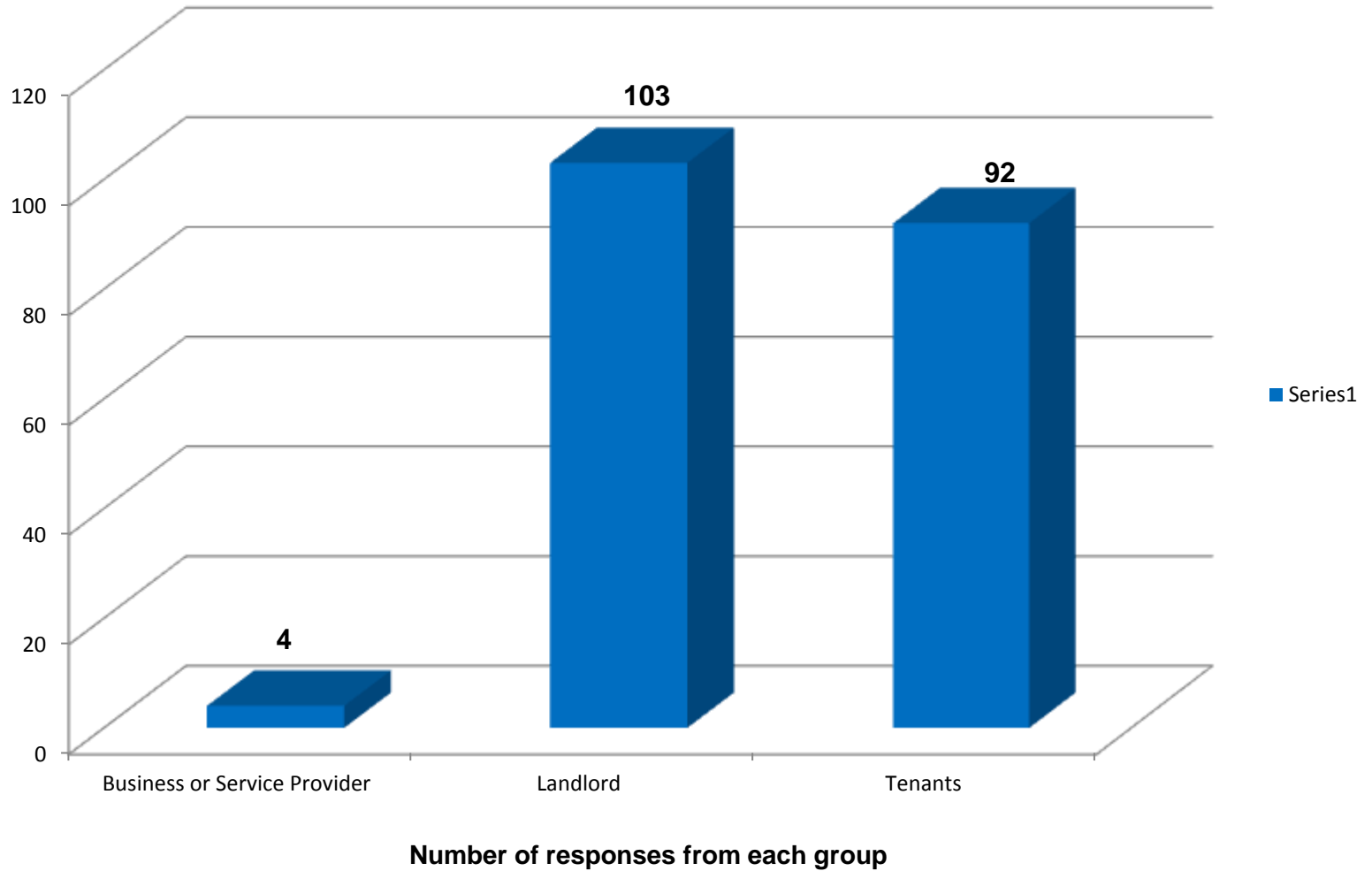
- Choose one of the following age bands  16 or under  
 19-19  
 20-29  
 30-39  
 40-49  
 50-59  
 60-74

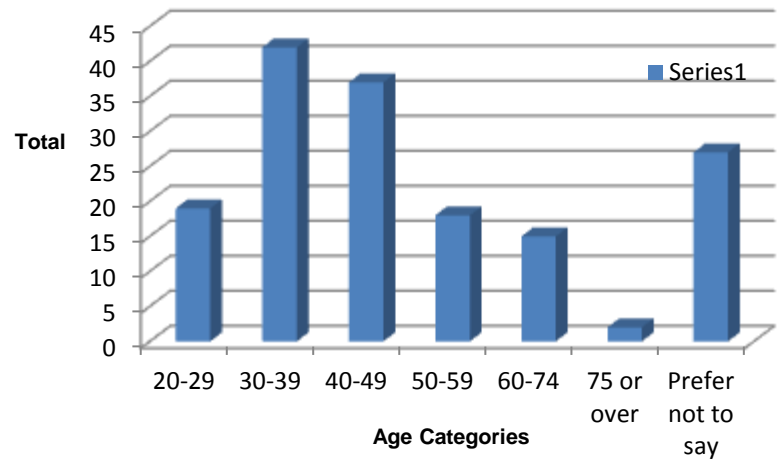
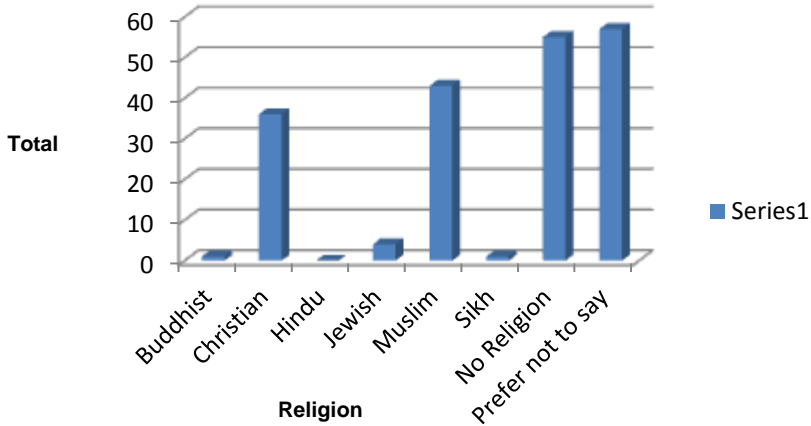
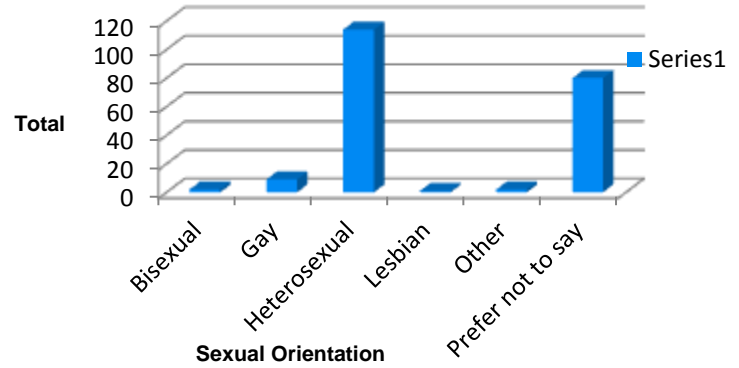
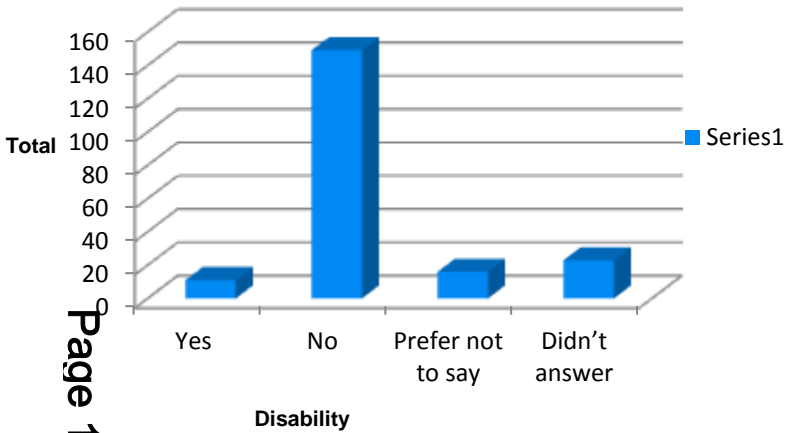
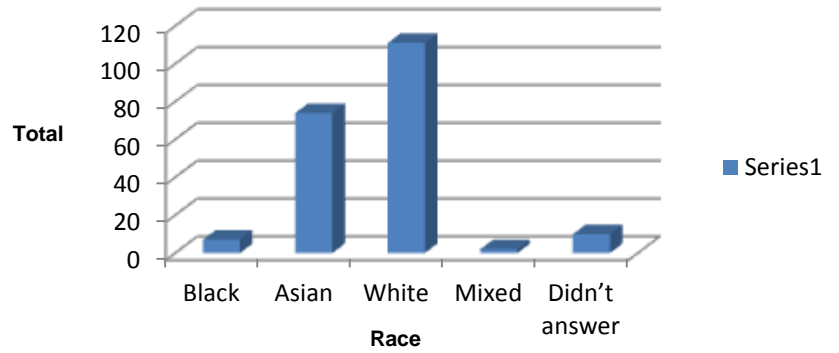
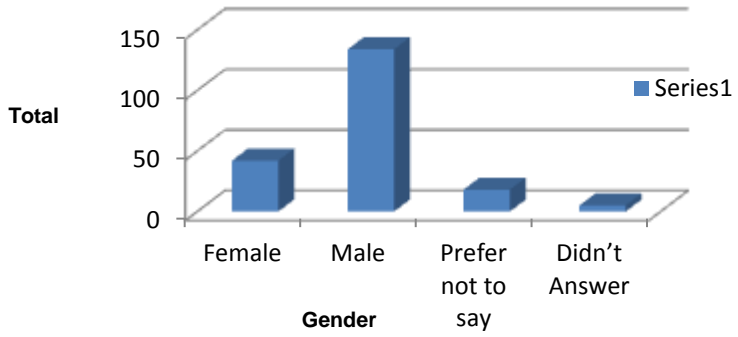
# General Responses

# Total Number of Responses

Page 122

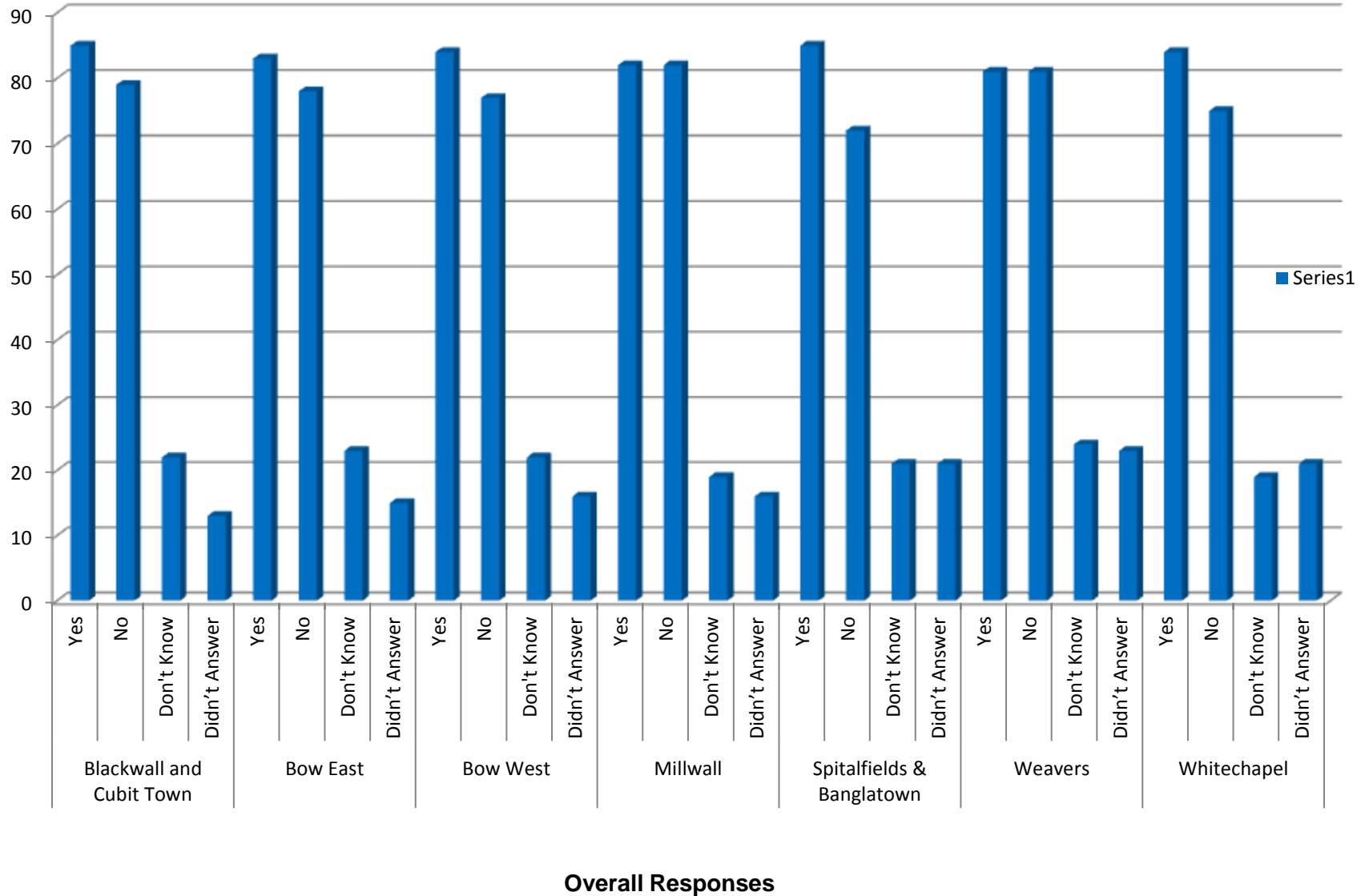
Total





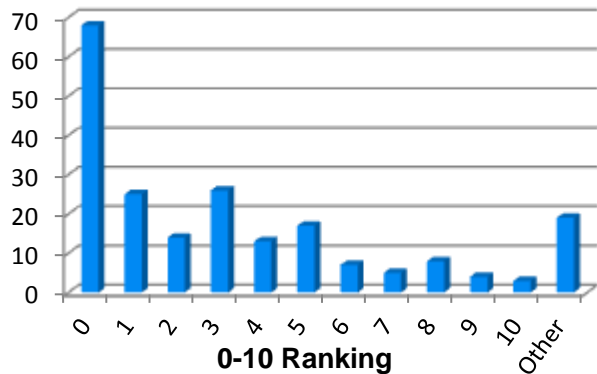
# Support For Selective Licencing

Page 24



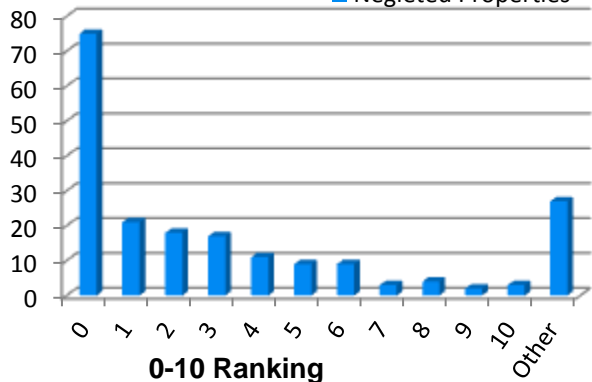
### Loud Noise

■ Loud Noise



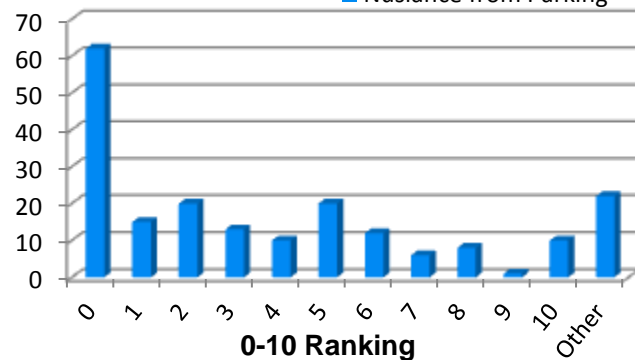
### Neglected Properties

■ Neglected Properties



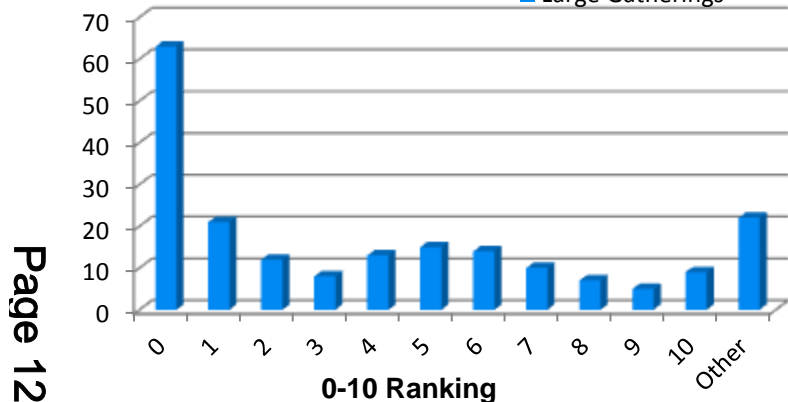
### Nuisance from Parking

■ Nuisance from Parking



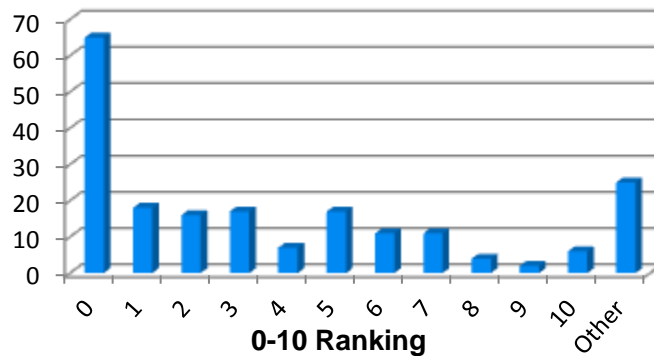
### Large Gatherings

■ Large Gatherings



### Treating others

■ Treating others



Page 125

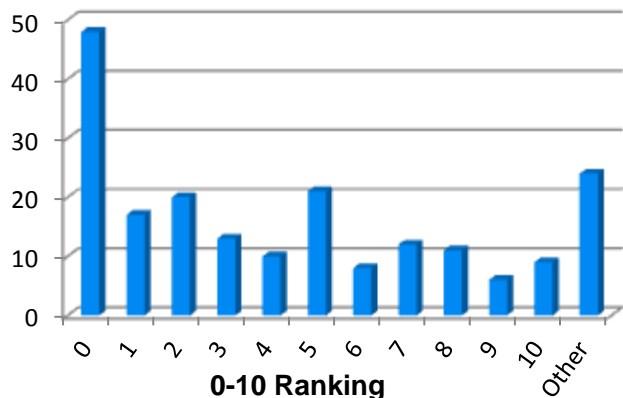
### Littering

■ Littering



### Rubbish Dumping

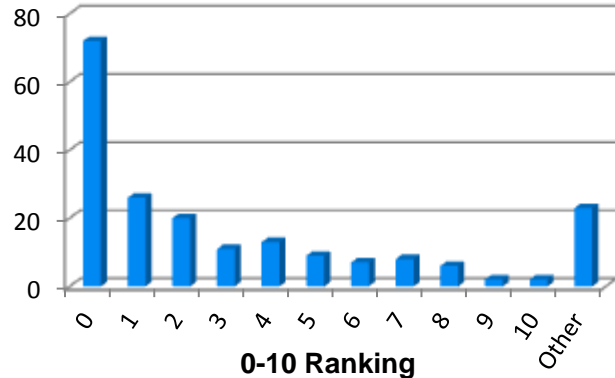
■ Rubbish Dumping



### Nuisance from

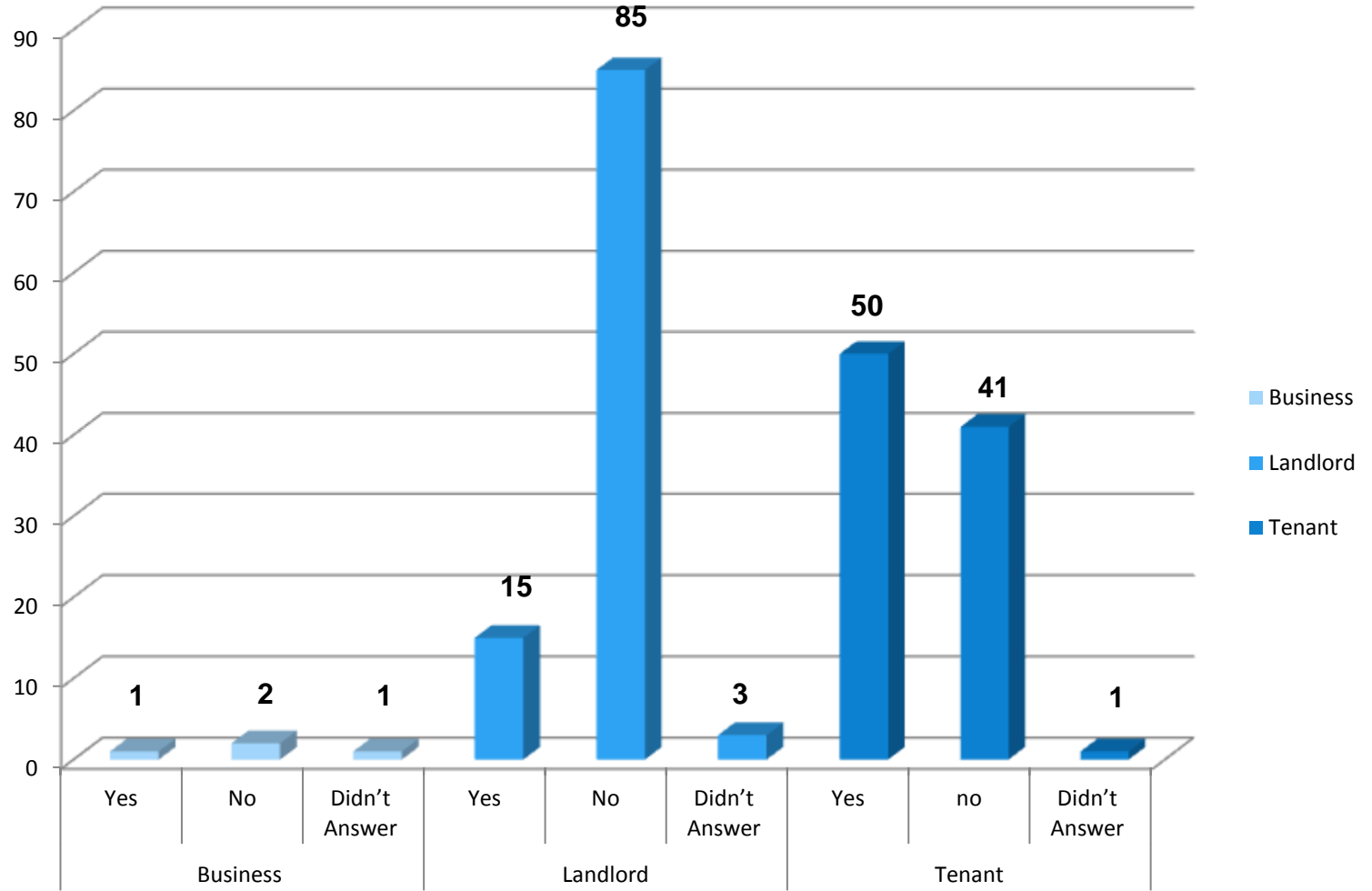
### Neighbours

■ Nuisance from Neighbours



# Victim or witnessed ASB

Total

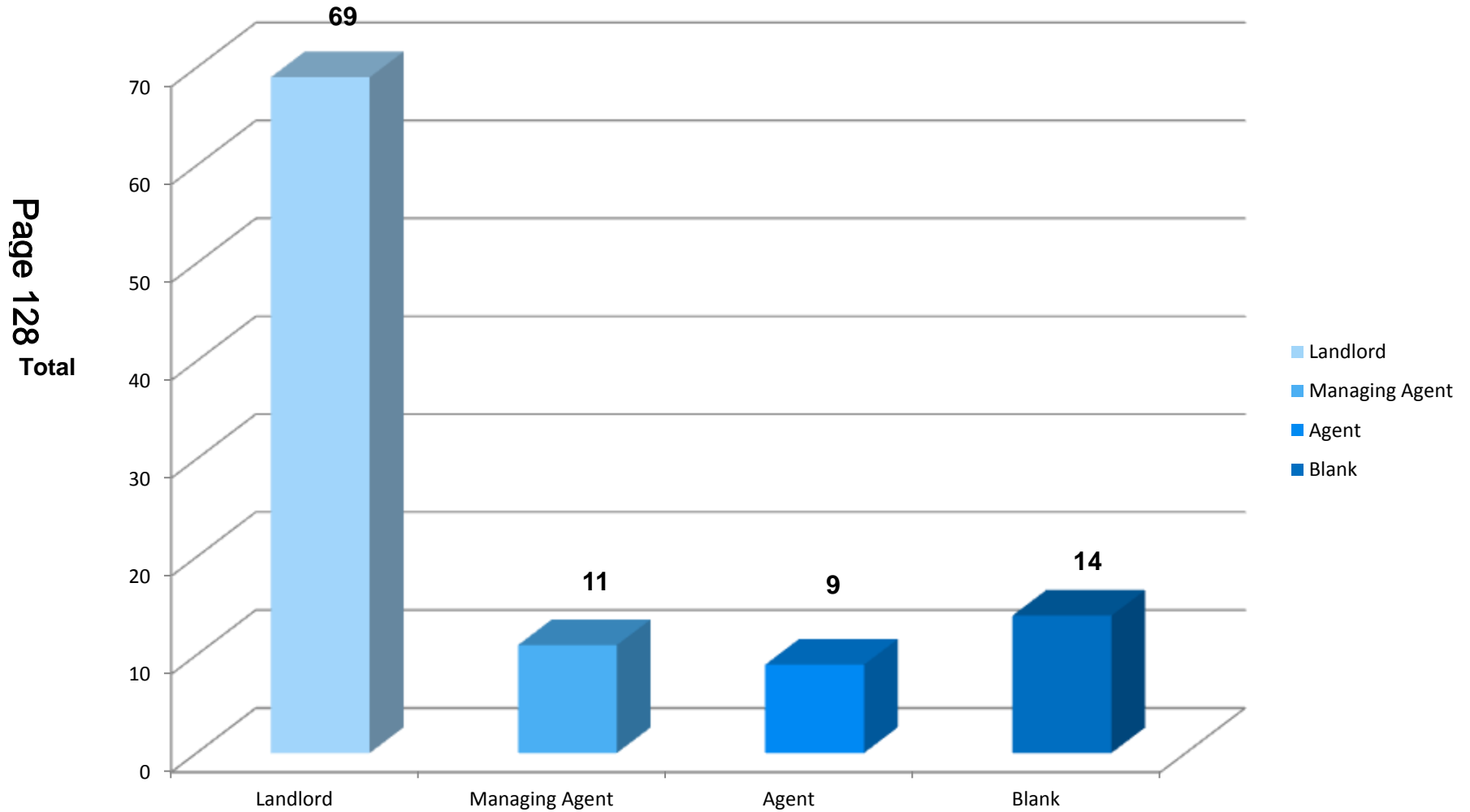


Responses by group

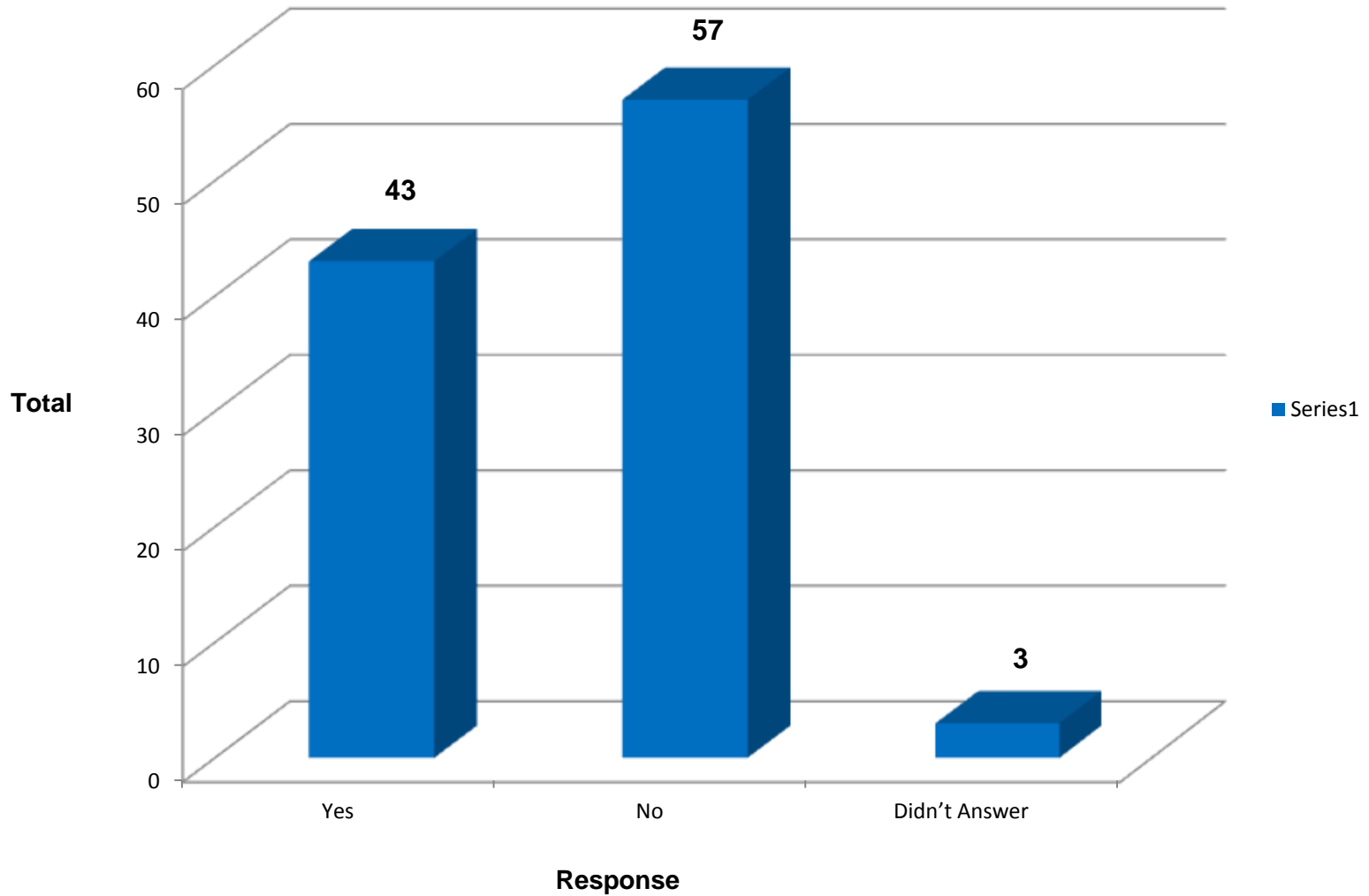


# Landlord/Managing Agents Responses

# Landlord, managing agent or agent?



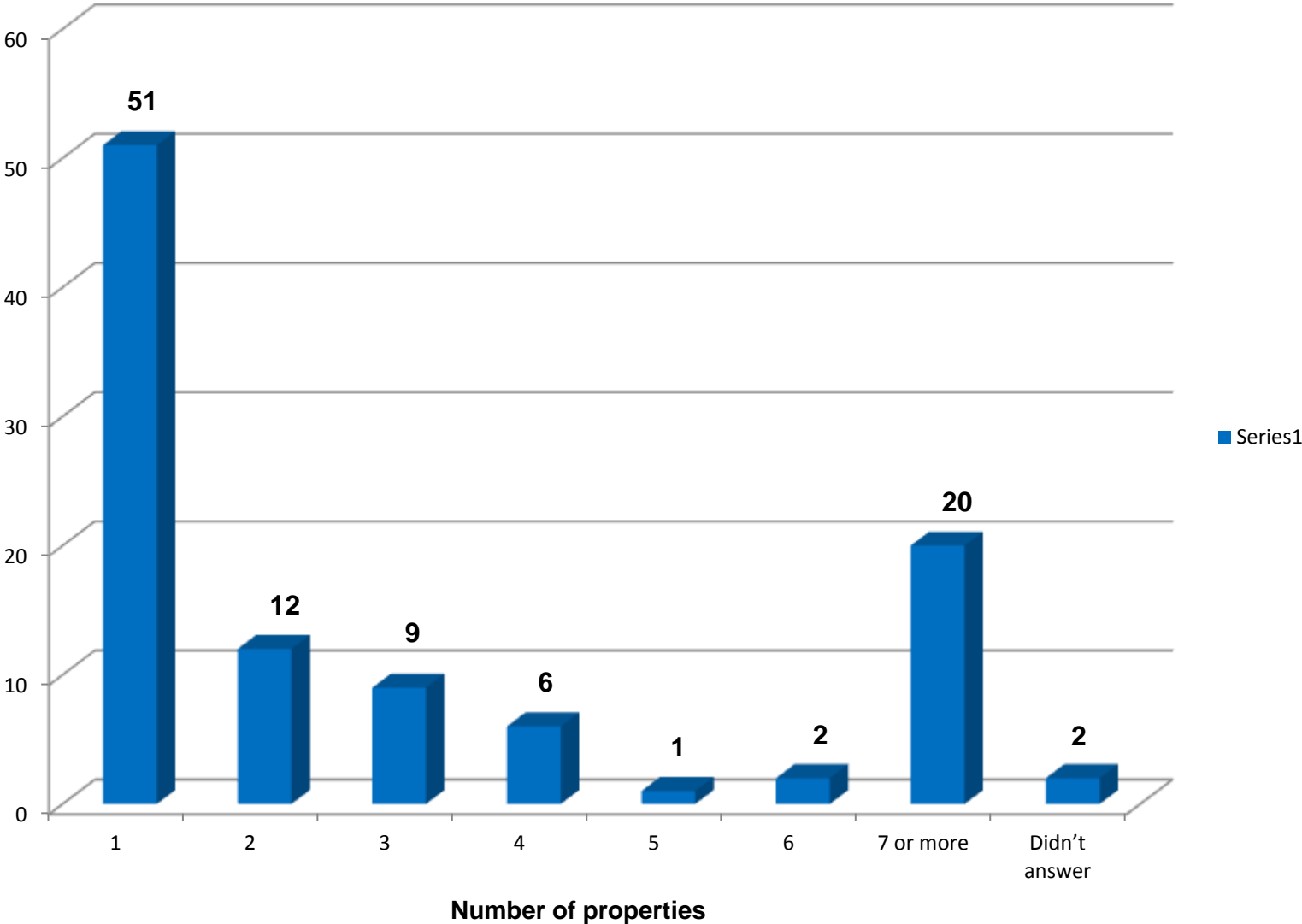
# Properties owned in other areas of Tower Hamlets



# How many properties do Landlord own in Tower Hamlets?

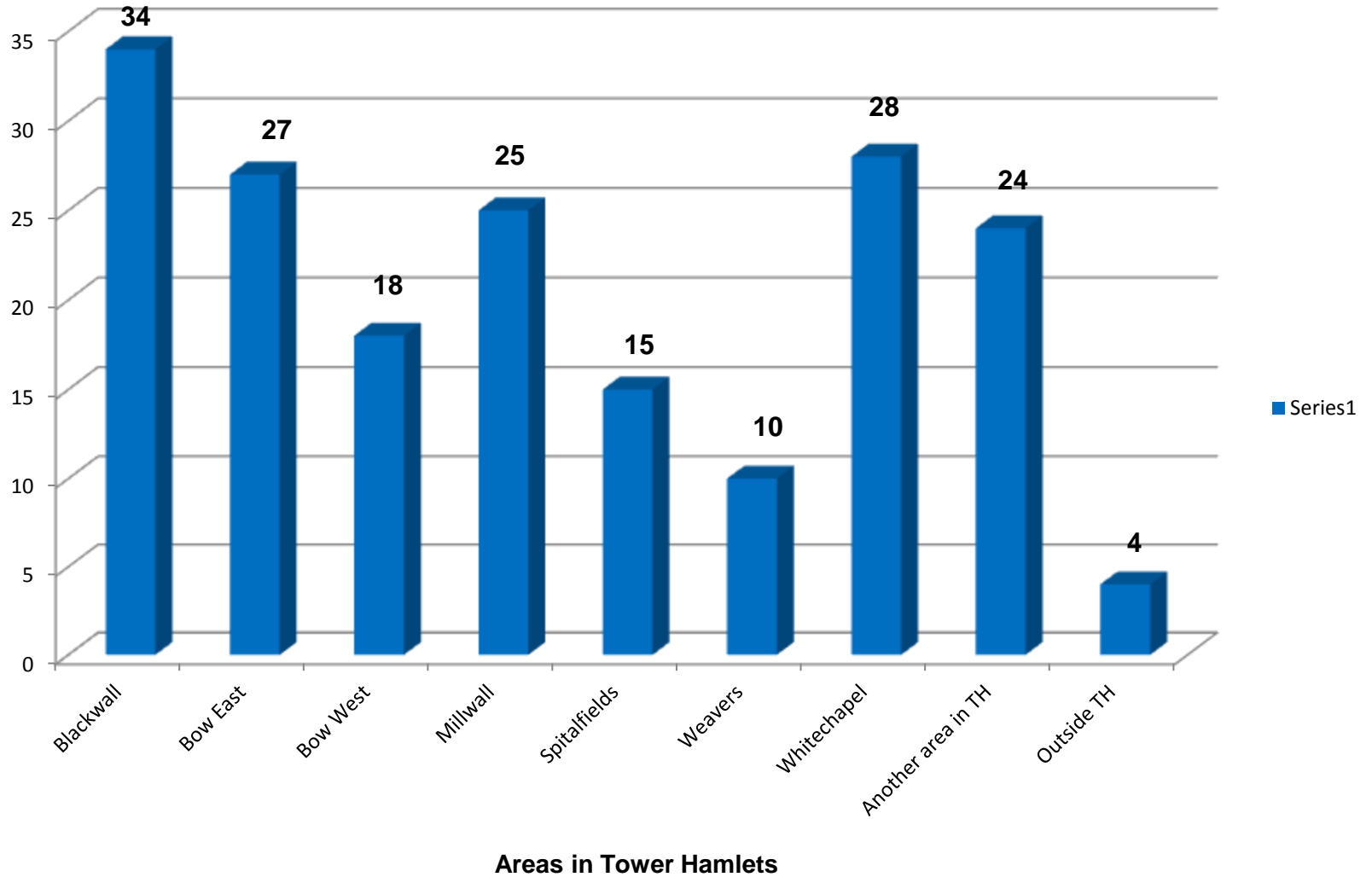
Page 130

Total



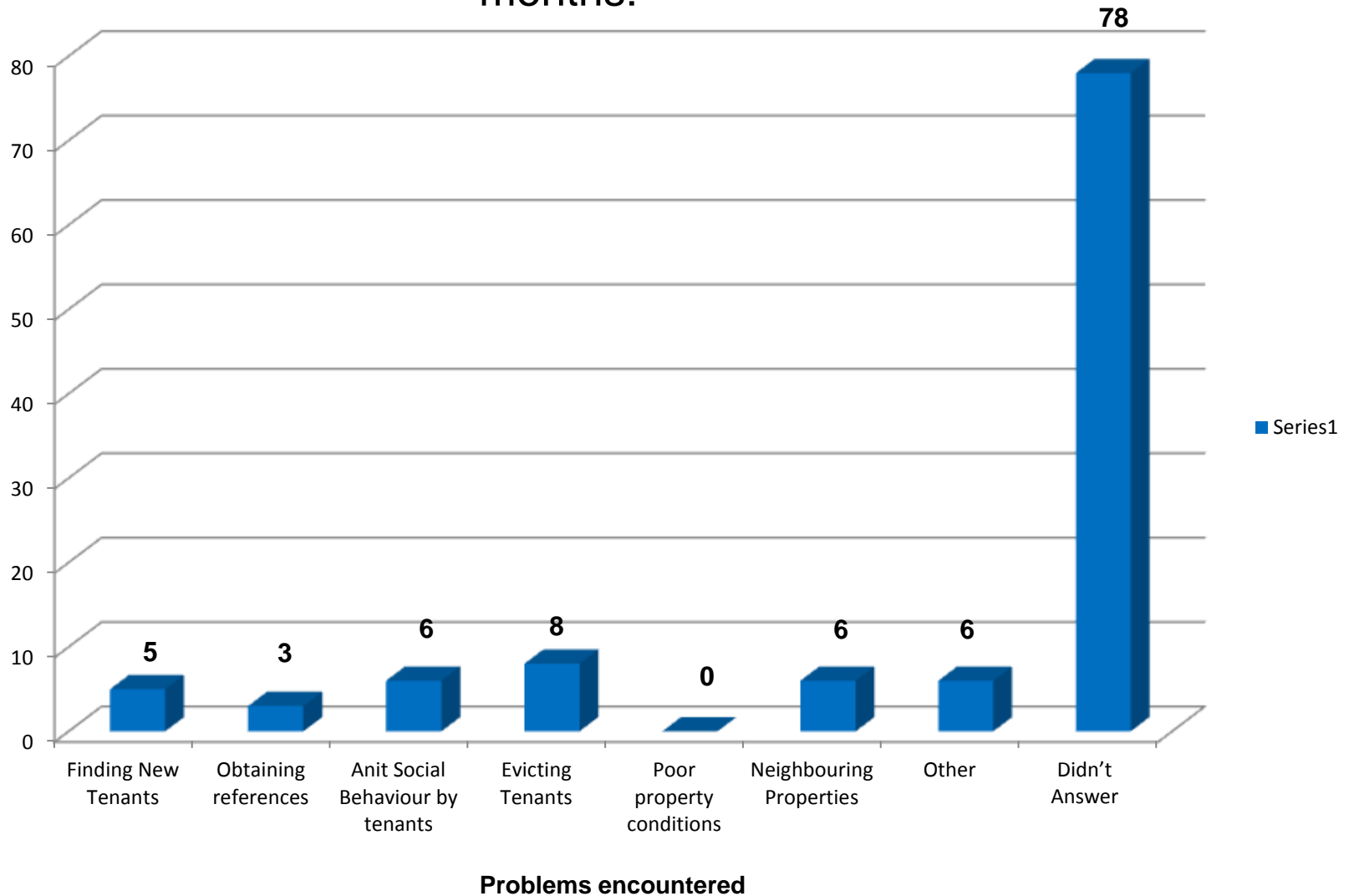
# Areas Landlords own or manage

Totals  
Page 131

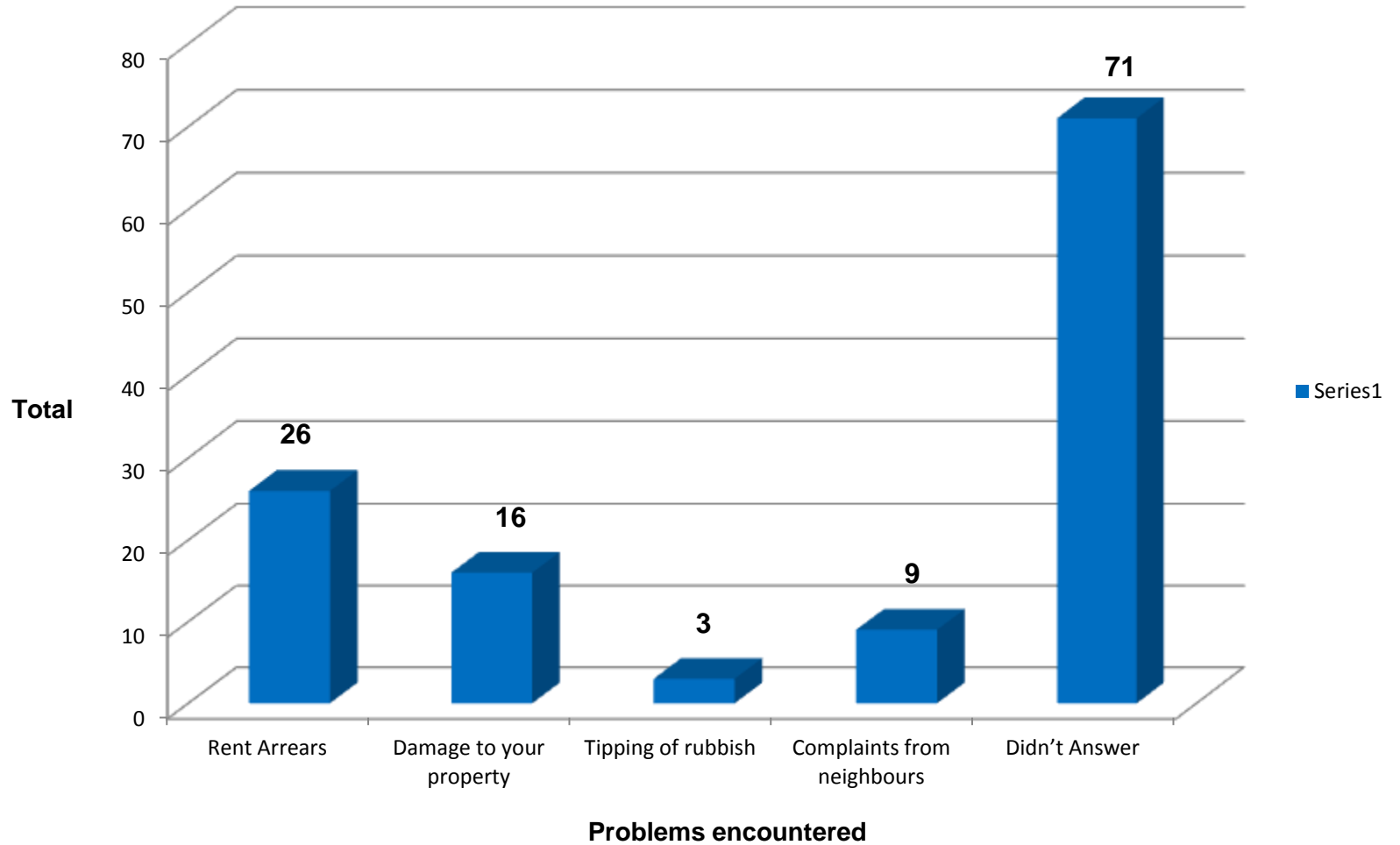


# Problems landlords etc. encountered in the last 12 months:

Total

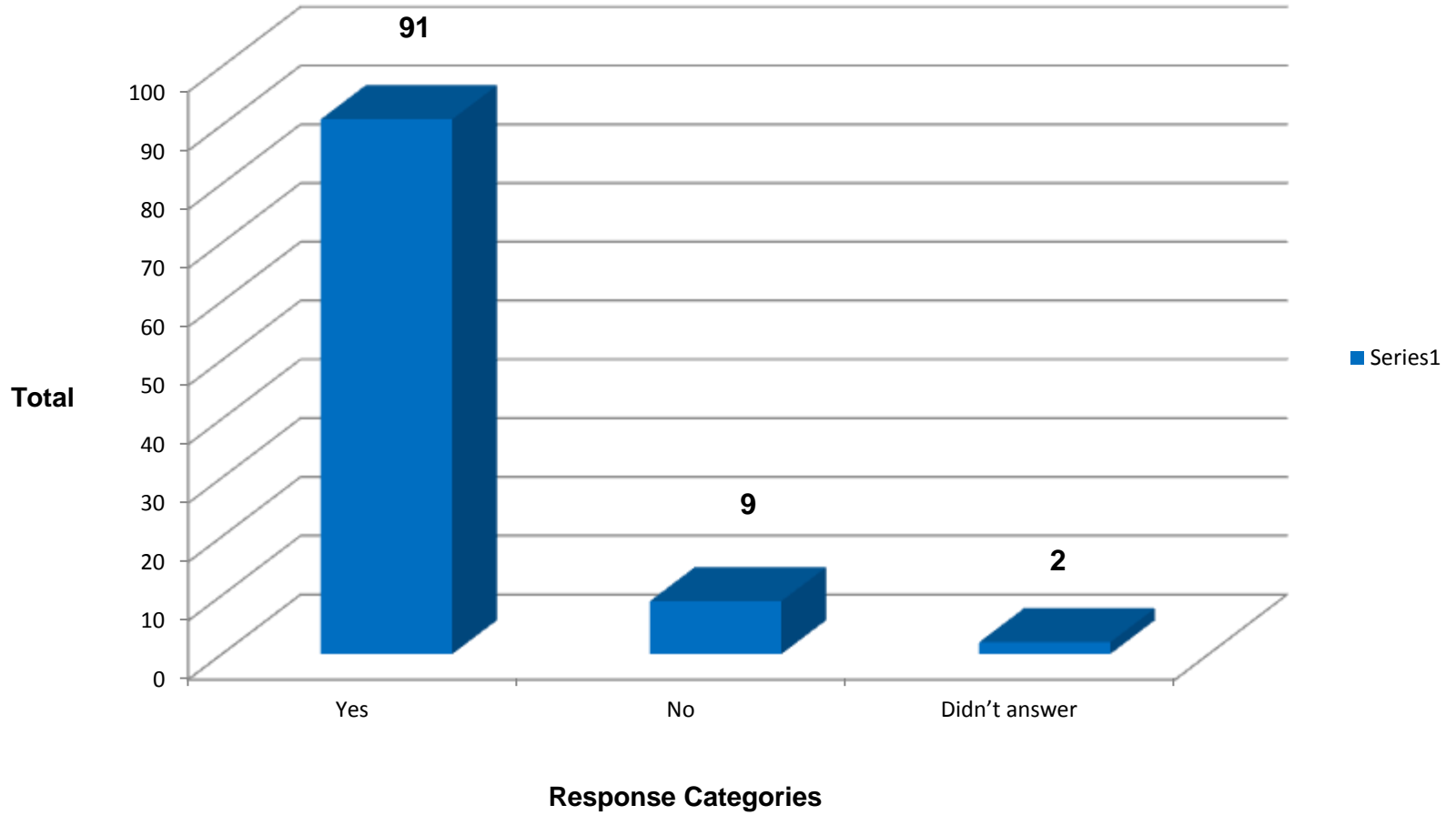


# Has the Landlord had any problems with tenants?



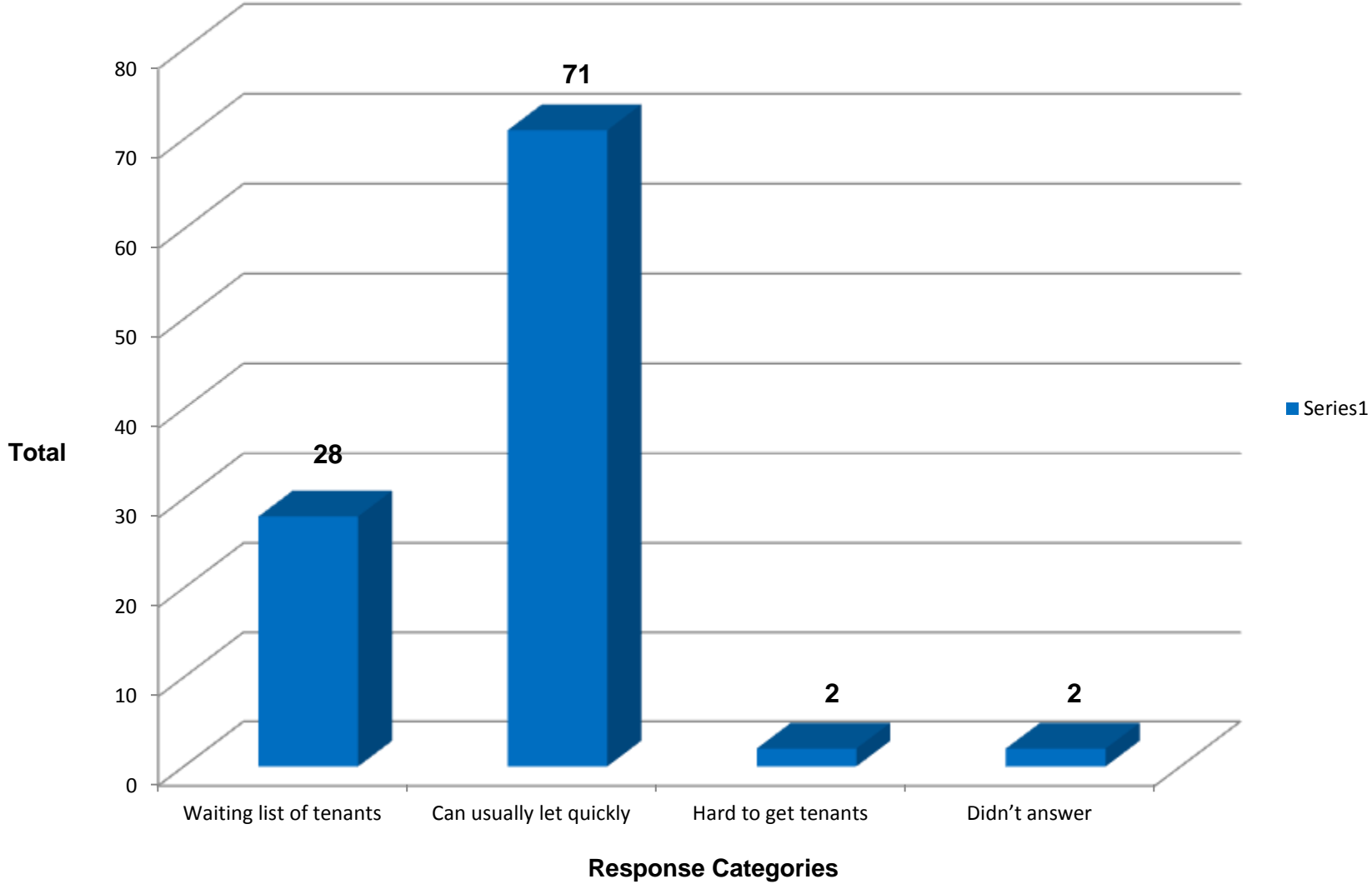
# Do you request references?

Page 134

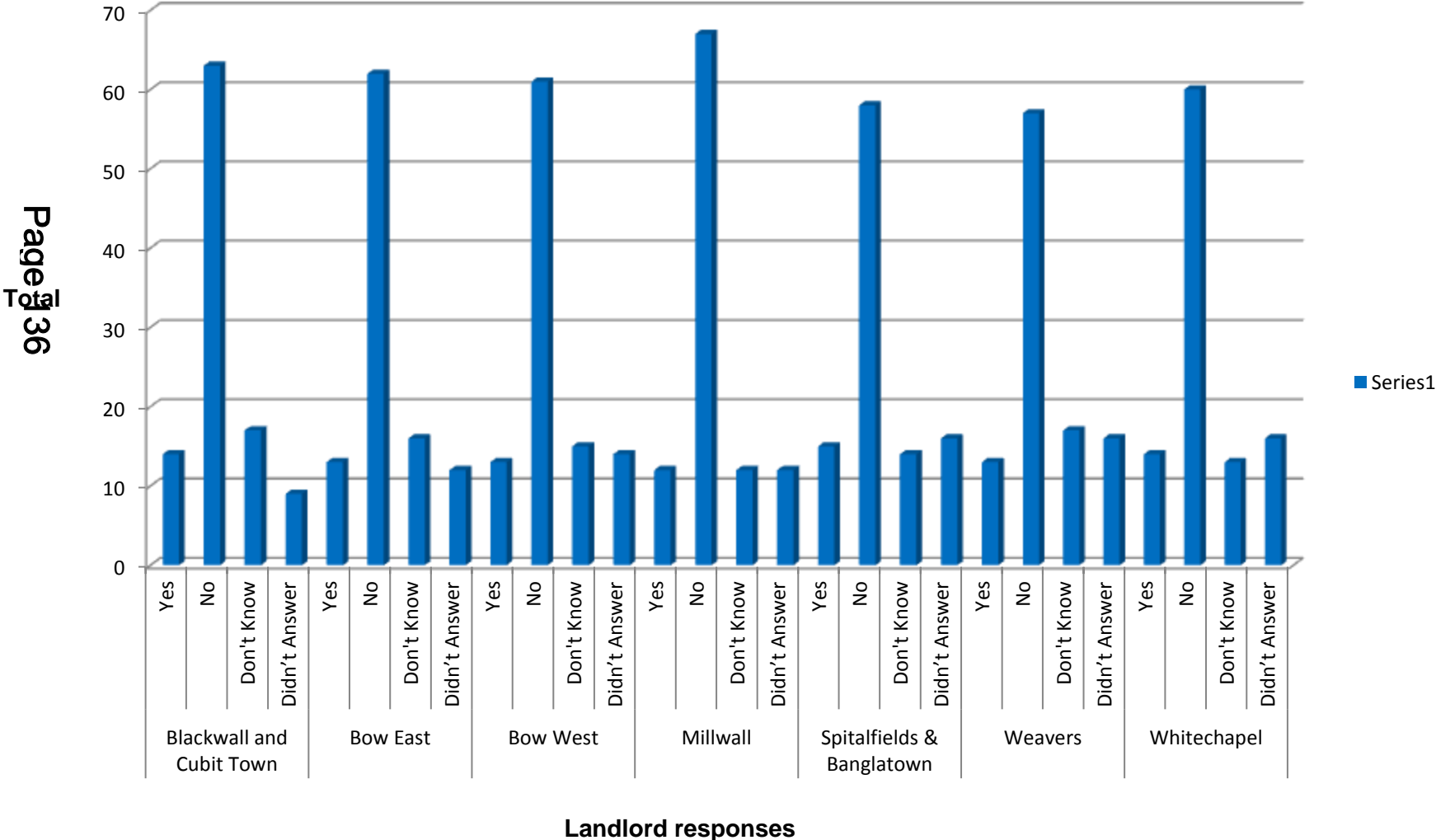




# Demand for your property?



# Support for selective licensing

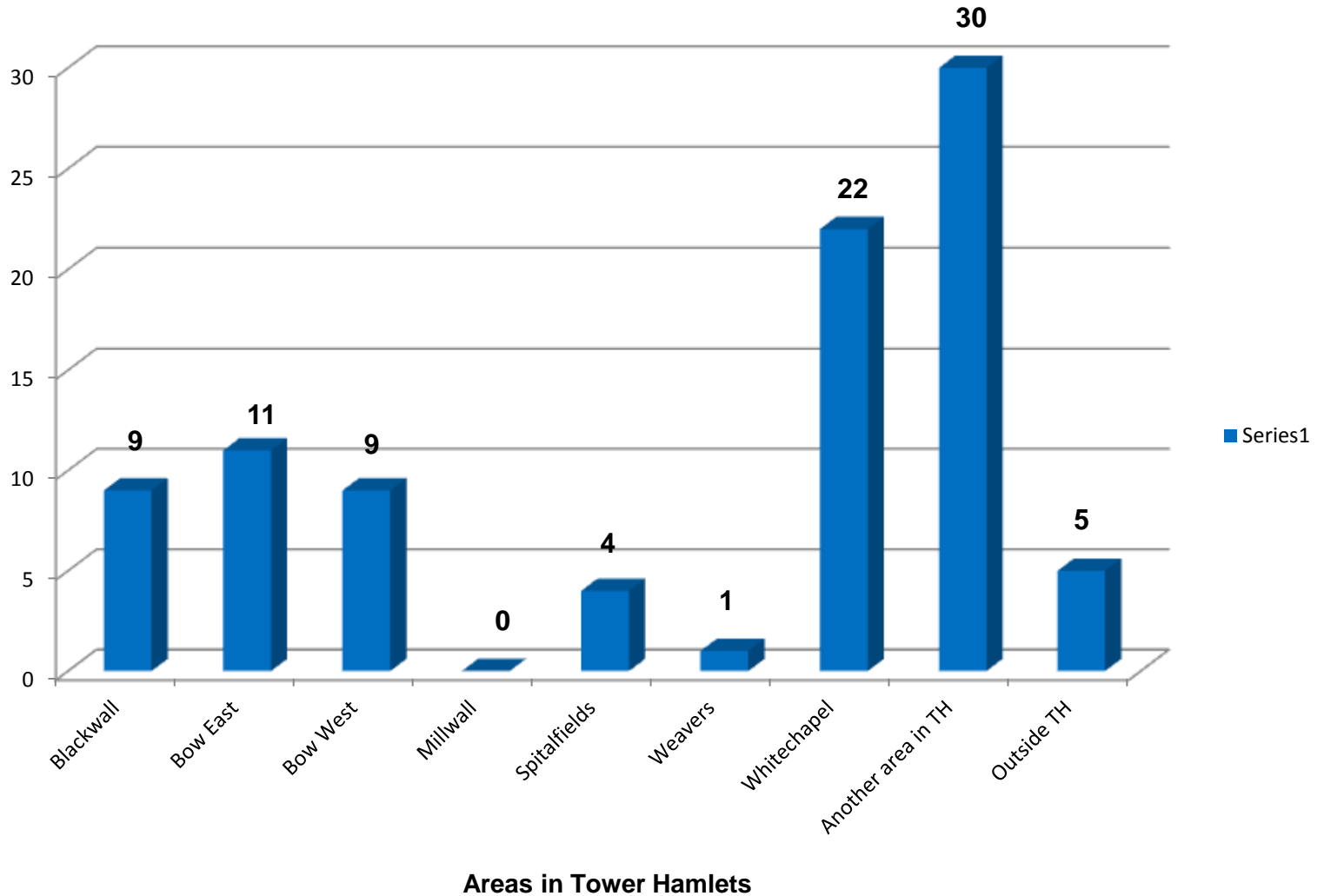


# Tenant/Resident/Business Responses

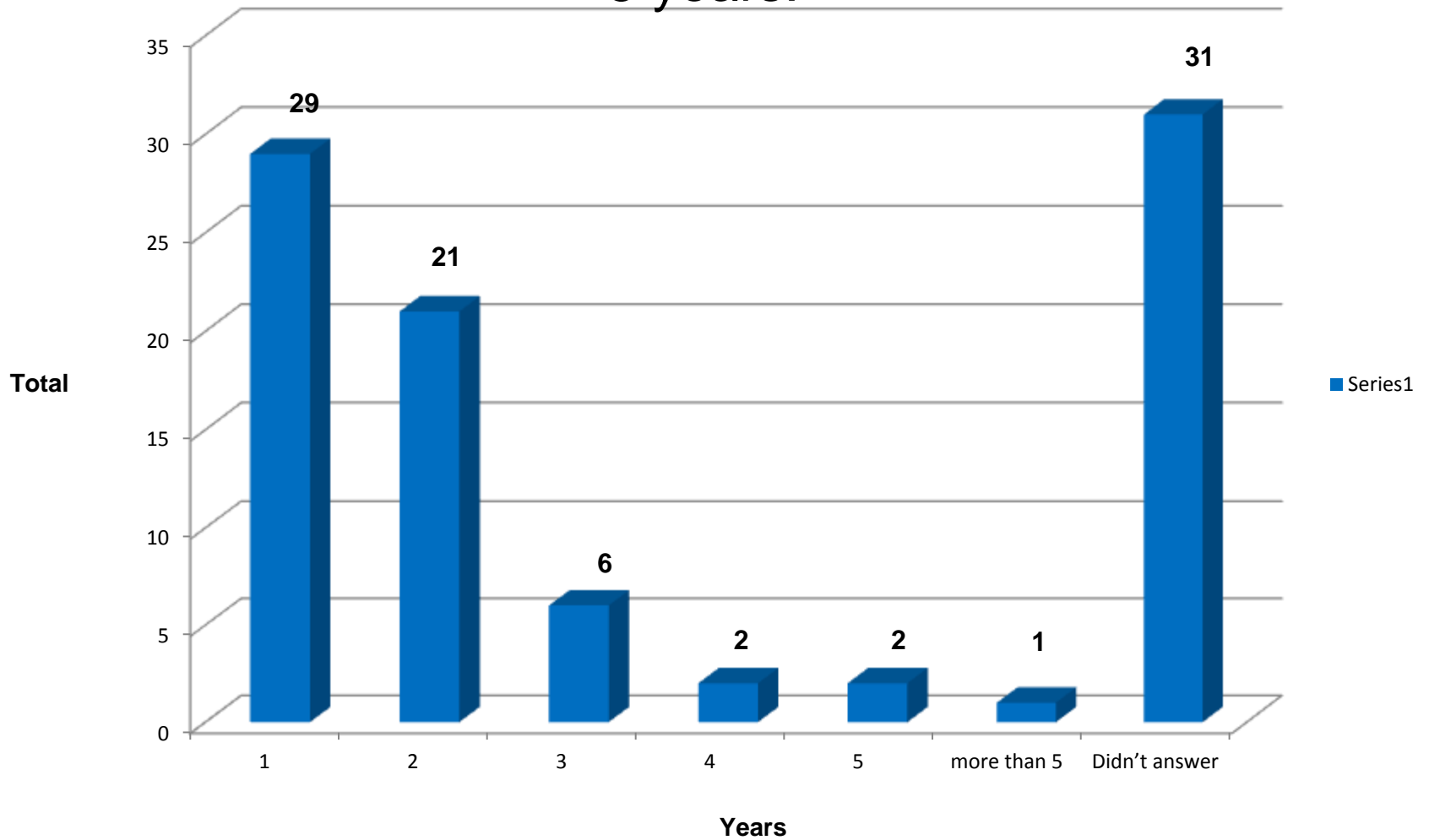
# Which area do you live?

Page 138

Total



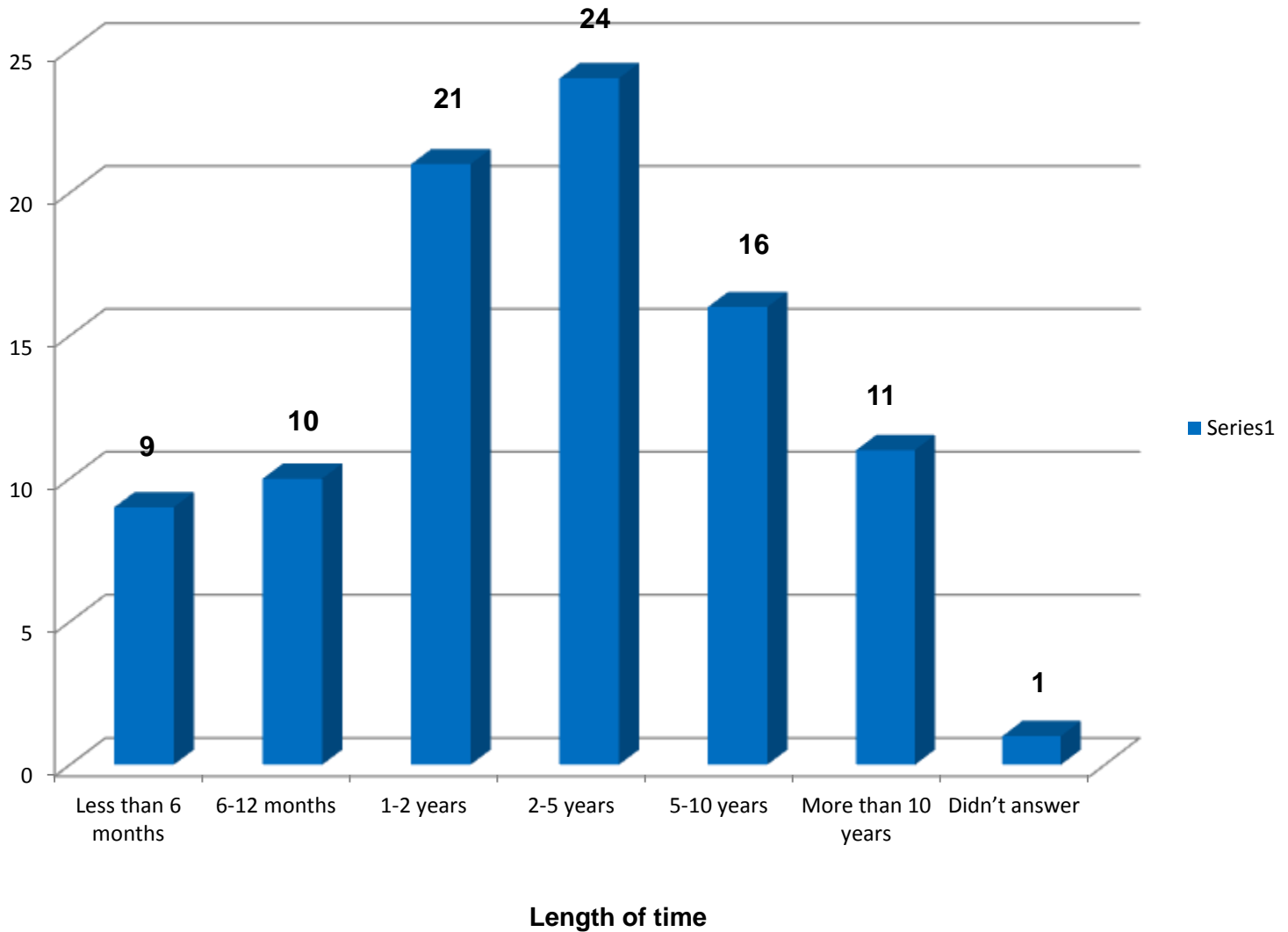
# Number of properties tenants/residents have lived in last 5 years:



# How long have you lived in your current property?

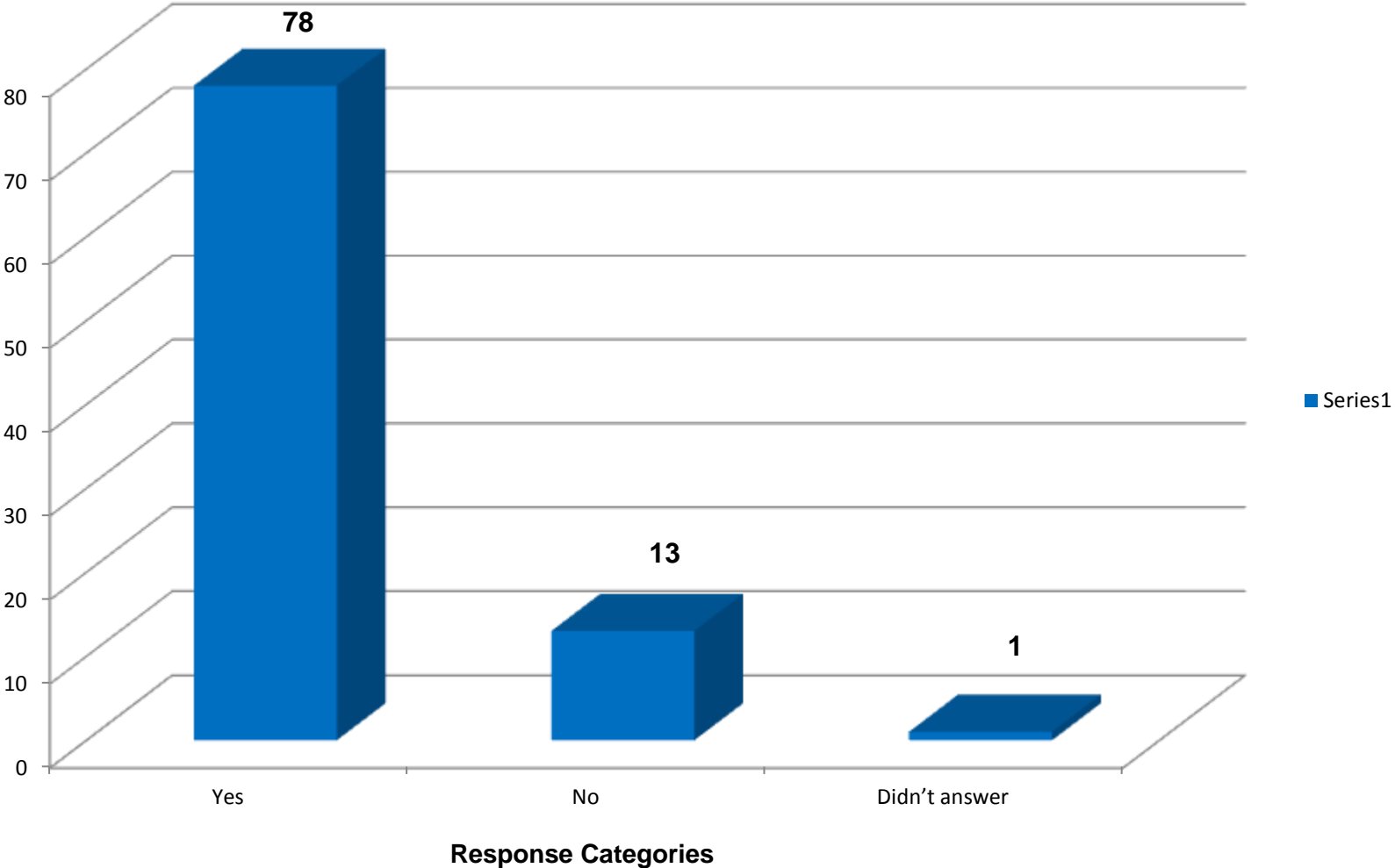
Page 140

Total



# Do you feel safe in your home and your area?

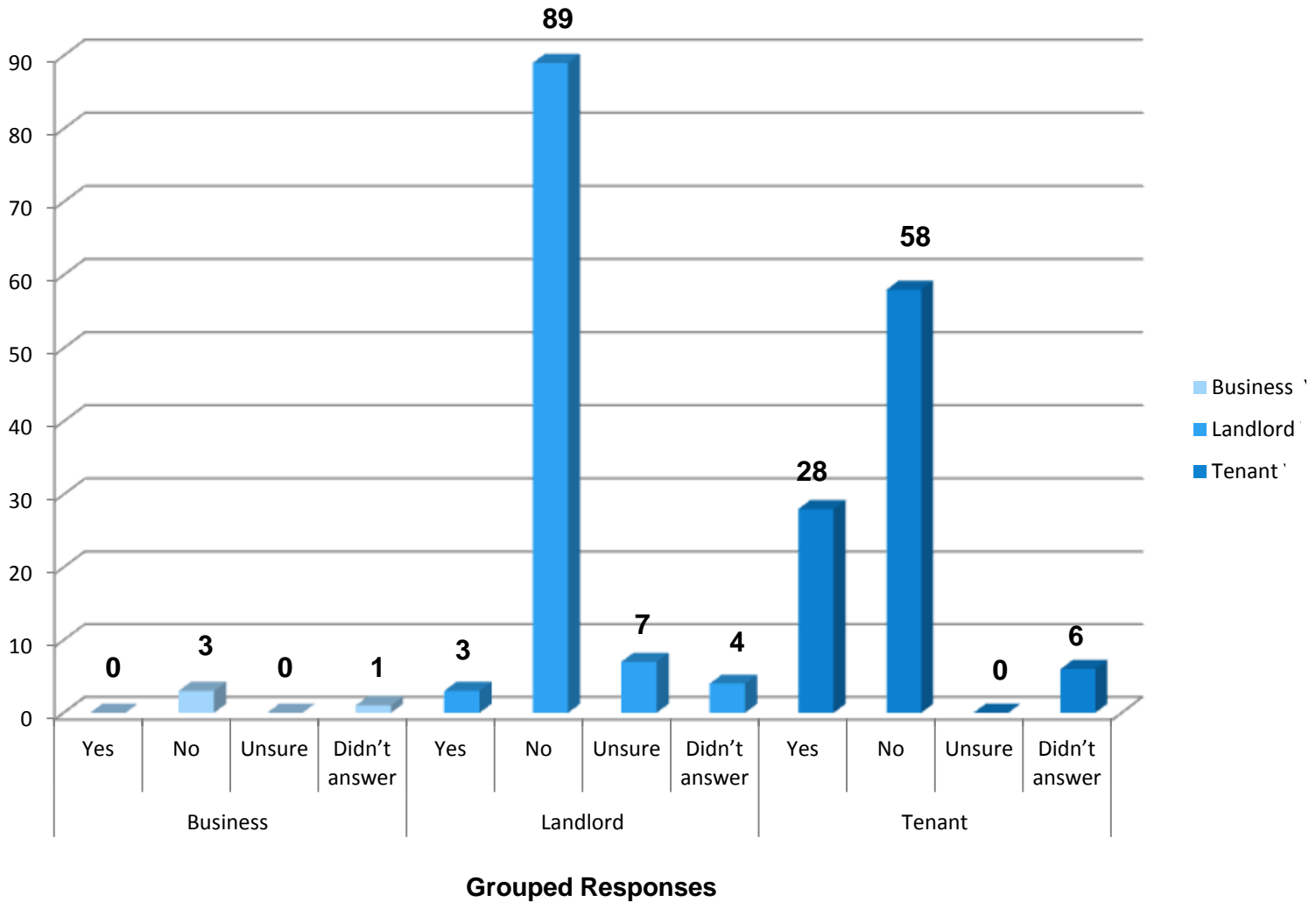
Total  
Page 141



# ASB Caused by Residents or Tenants

Page 142

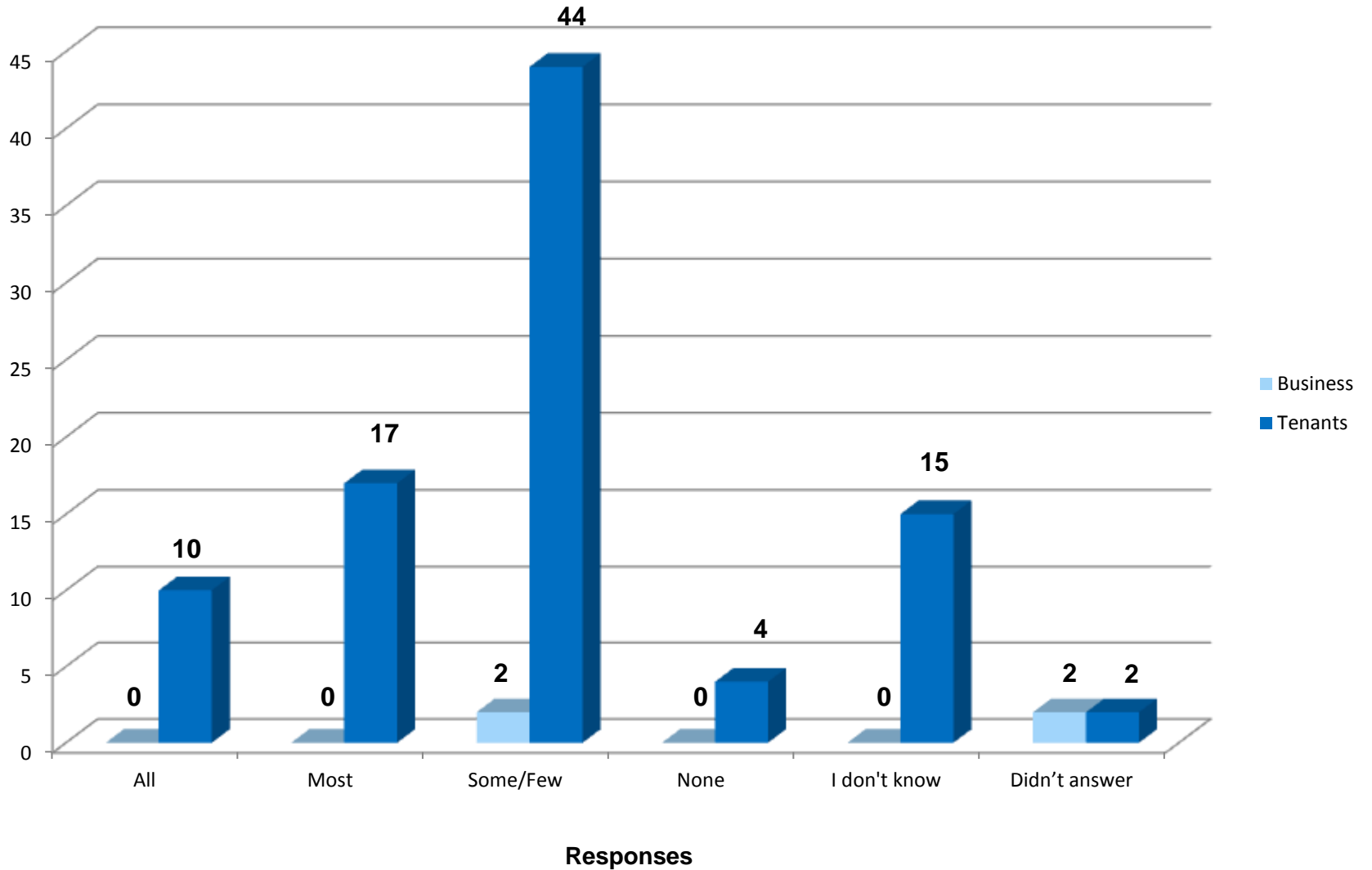
Total





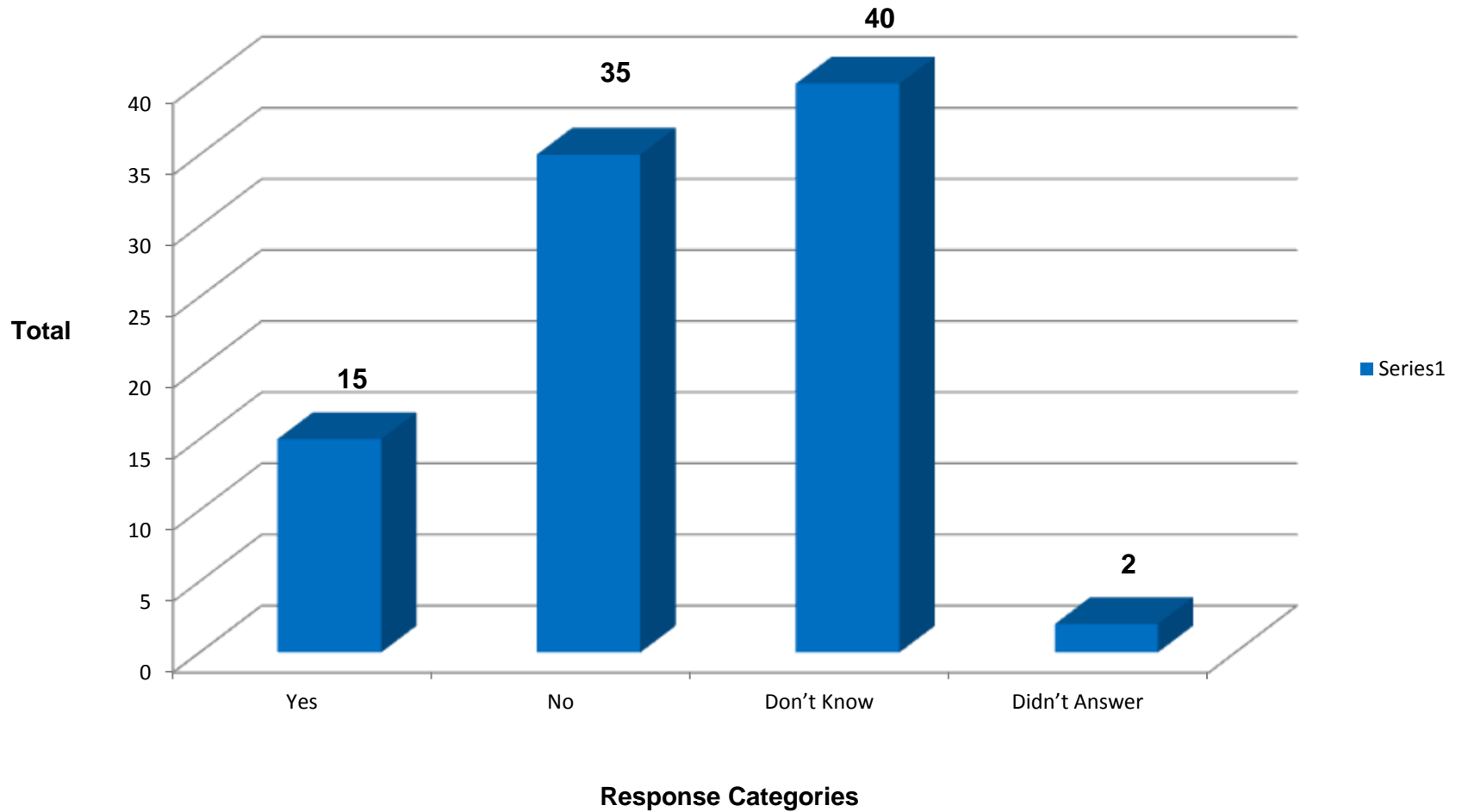
# Does Landlord act responsibly?

Page 143

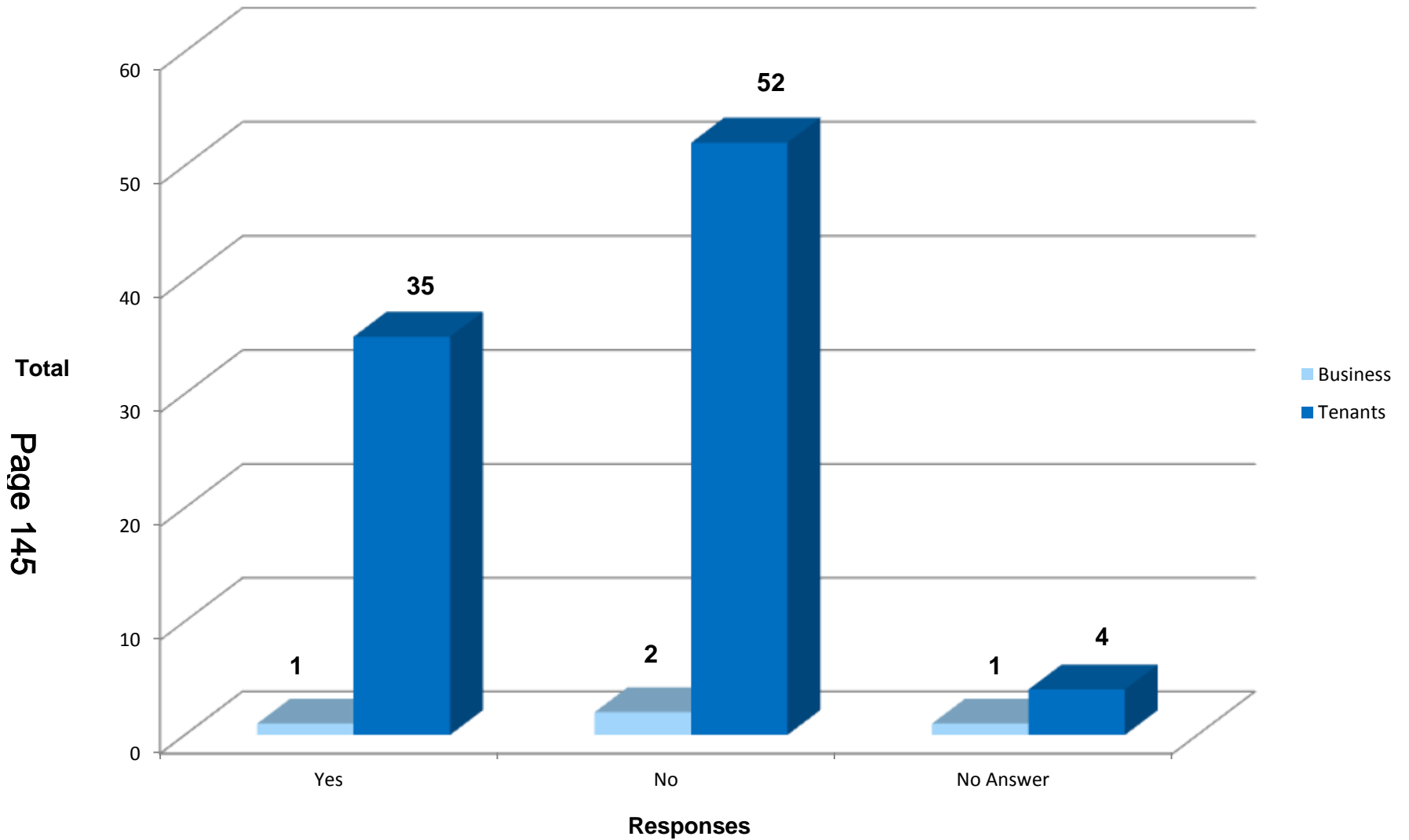


# Do you think landlords takes action on tenants who cause nuisance?

Page 144



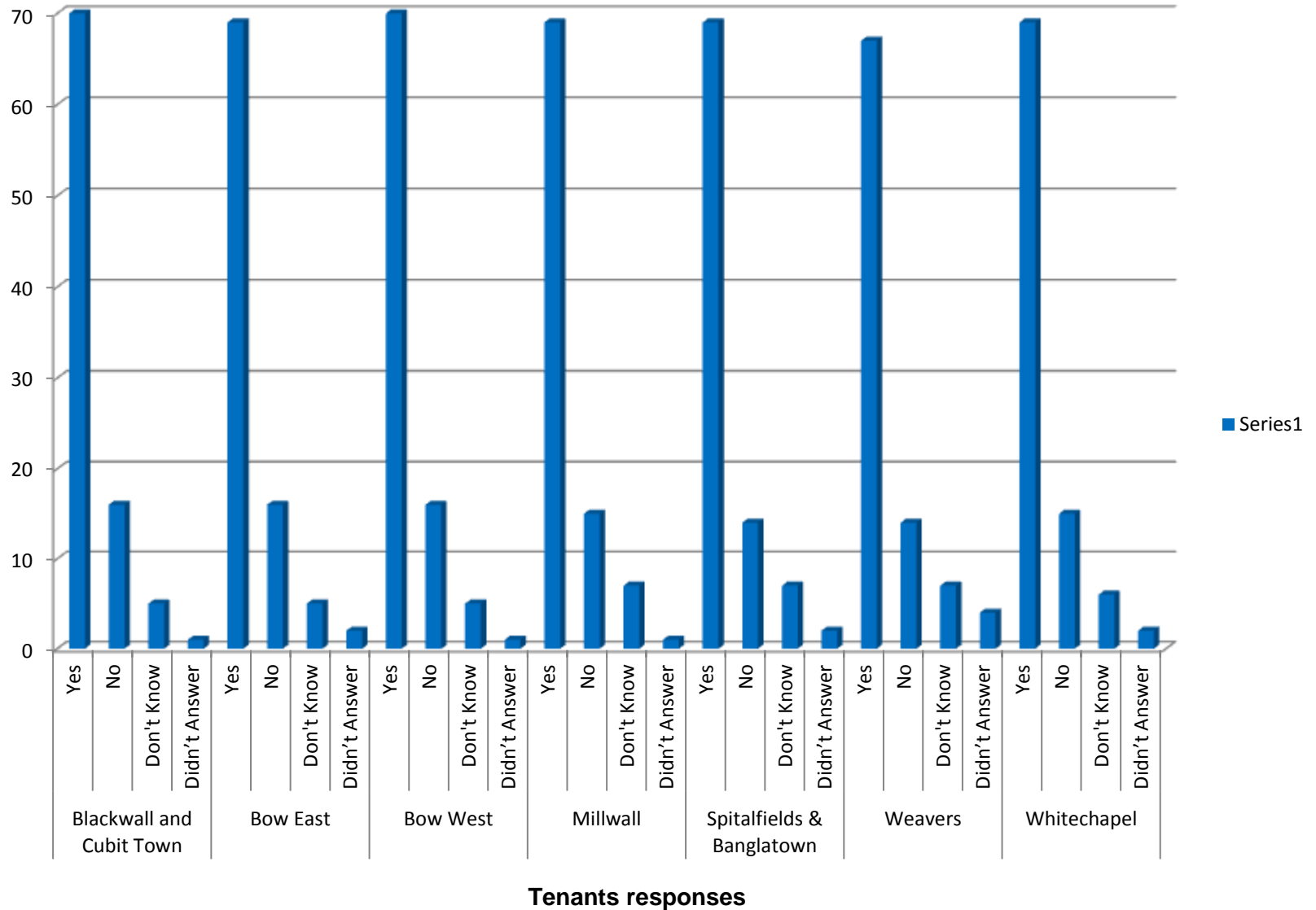
# Are Properties Maintained?



Total  
Page 145

# Support for selective licensing

Page 146  
Total



## Other courses of action - positives and negatives

Programme of Work	Positives	Negatives
Use of Special Interim Management Orders and Empty Dwelling Management Orders	<p>Improves property and management standards to tenants and others.</p> <p>Responsibilities given to an nominated agent and removed from landlord</p>	<p>Reactive and intervention of last resort.</p> <p>Resource intensive</p> <p>Does not necessarily deal with poor management techniques</p> <p>Can last up to a maximum of 5 years and then property return to original owner. Not a long term solution to poor management.</p>
Private sector leasing schemes and framework agreements with existing landlords.	Prevents homelessness and allocation of housing to those in most need.	<p>Reactive rather than proactive.</p> <p>Resource intensive</p> <p>Limited to those who want to work with the Council</p> <p>No improvement of management standards of those that do not want to join the scheme</p>
Support to private landlords/voluntary accreditation schemes	<p>Standards improved where landlord is engaged.</p> <p>Increases landlord knowledge</p> <p>Business orientated</p> <p>Reduces need for formal action</p>	<p>Needs landlord voluntary engagement.</p> <p>No enforcement powers</p> <p>Property accreditation schemes are already available, low uptake.</p>

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## Appendix Nineteen

### Selective licensing scheme: Complementary Action

There is a whole raft of work that has been undertaken by the council and partners which complement the proposals to introduce a selective licensing scheme for private sector landlords. The information below is a round-up of this work:

- [Housing Strategy/Vision](#)
- [Place making and Sustainable Communities](#)
- [Empty Homes](#)
- [Homelessness](#)
- [Working with other agencies/partners](#)
- [Anti- social behaviour](#)
- [Regeneration](#)
- [Landlord accreditation](#)
- [Other courses of action to be considered](#)
- [Impact for Tenants in private rented accommodation](#)
- [Impact for Landlords of private rented accommodation](#)
- [Impact for residents/ neighbours of private rented accommodation](#)
- [Landlord Public Register](#)

#### Housing strategy/vision

##### Delivering and managing decent homes

Every resident in the borough has a right to live in a home that meets a decent standard and is managed effectively. The standard of homes and management varies considerably in the borough and the council wants to see all social sector housing and private housing occupied by vulnerable sector households raised to decent homes standard levels and wants all landlords delivering a good management service.

##### Place making and sustainable communities

Housing has a key role to play in delivering better places to live and offering people opportunities to achieve a better quality of life. This involves ensuring that new and regenerated housing environments make a positive contribution to the places that people live in. In addition, new investment has to make a positive contribution to the opportunities available to people through access to services.

##### Empty homes

There are privately owned properties lying empty in Tower Hamlets. There is an undoubted housing need in Tower Hamlets, and these vacant properties could provide much needed accommodation. Many of these properties are in a neglected state and have a damaging effect in the areas in which they are located.

The council keeps a record of long term empty properties (those which have been empty for over a year) in the private sector by ward. At present, derived from the last report produced by from Council Tax records there were 84 properties across the Council in various wards.

At the last stock condition survey there were approximately 1,500 homes empty for six months or more and currently considerable efforts are made to bring these back into use. This Landlord Licensing Scheme would help us in identifying owners, encouraging them to bring properties back into use.

## Homelessness

The landlord licensing scheme would ensure better management practices and should help to increase the length of tenure and reduce incidence of unplanned moves or homelessness.

Welfare Reform through capping of Local Housing Allowance (LHA) levels, applying the single person allowance to singles under 35 and the introduction of Universal Credit will further change the face of private sector renting in the borough. Increasingly local residents will not be able to rent within the borough, forcing many households out of Tower Hamlets or into worse and more crowded homes.

- There are over 1,996 households in temporary accommodation placed by the council; this has increased by 10 per cent in the last 12 months.
- In 2013/14 the Housing Options Team made 882 homeless decisions, this is 25% up on decisions made in 2012/13.
- 557 households were accepted in 2013/14, 24 per cent down on 2008/9.
- During 2013/14 the Housing Options Team prevented over 731 households becoming homeless.
- Although the general trend in homelessness has been downwards over the last four years, these trends have shown an upwards turn across the London region since the second quarter of 2011/12.

The main known reasons for households being made homeless has changed as a result of the welfare reforms with landlords now requiring their properties back to let on the open market where they can command higher rents than those affordable on benefits and low incomes. In 2012/13, 93 (22 per cent) households were homeless as a result of the



ending of their Assured Shorthold Tenancies, in 2013/14, this figure was 170 (30 per cent).

## **Working with other agencies/partners**

The Housing Strategy team has excellent working relationships with central government agencies, other local authorities, RSLs, regional housing partners and other agencies in the borough, such as the East London Housing Partnership, London Housing Consortium and LBTH Housing Forum, in order to ensure the council's housing targets are met. This includes management of the Housing Revenue Account (HRA) and the housing management client function and monitoring of the borough's ALMO (Tower Hamlets Homes) to ensure delivery of services to the agreed standard. The strategy team also manage delivery of decent homes across the borough, primarily through the ALMO, but also through close liaison of partners (RP's) through the Tower Hamlets Housing Forum (THHF).

## **Anti-Social Behaviour (ASB)**

Sometimes, private rented housing can be linked to anti-social behaviour (ASB). Particular examples associated with the private rented sector include graffiti, noise nuisance and drug related ASB. The main way in which private landlords can control ASB caused by their tenants is by enforcing the terms and conditions of the tenancy agreement. Terms can be inserted into tenancy agreements to impose standards of behaviour on tenants and to prohibit ASB. Most landlords include in their tenancy agreements a general clause to prohibit nuisance behaviour; others include specific terms covering pets, violence and offensive language. In the event of a breach the landlord will be entitled to seek possession of the property or seek an injunction to prevent any further breach. Under new legislation, a private landlord can also evict a tenant who has certain convictions or court orders against them.

There is also a range of activity that the council takes to tackle and deal with ASB related to the private rented sector and more generally. This includes:

- proactive ASB patrols by Tower Hamlets Enforcement Officers (THEOs) and the council funded Police Partnership Taskforce
- case management of multi-agency work on ASB cases
- investigation, and enforcement action in cases of persistent ASB and noise nuisance
- issuing legal notices and undertaking prosecutions
- closing premises associated with persistent ASB (including private rented premises)

- use of cameras to provide evidence
- support for victims of serious ASB
- taking action via the Community Trigger for persistent anti-social behaviour which has not been addressed by local agencies
- promoting reporting of ASB to the Police and partners on 101.

The council seeks to support good landlords, and where necessary take action against negligent or bad landlord practice. Licensing the private rented sector can help to reduce anti-social behaviour and improve neighbourhoods. For example, clarifying tenant and landlord responsibilities and the minimum standard of property management and maintenance can lead to better improved tenancy management, and improved neighbourhoods.

## Regeneration

Some areas of Tower Hamlets are the most deprived in the country. The council is required by law to review housing conditions in the private sector and any properties which are identified as being unfit for habitation, abandoned or generally considered to have out lived their useful life will be dealt with by:

- using grants to renew and improve private sector housing standards
- declaring a clearance area if the unfit properties are grouped together and seeking appropriate approval to demolish them (a clearance area has not been declared over the last ten years).

The private housing improvement team deals with grants relating to adaptations for disabled occupants, removal of minor hazards in the home, home security and energy efficiency.

There are grants for landlords to bring empty properties back into use or convert redundant commercial property for residential use. Please view the Tower Hamlets [Private Sector Renewal and Empty Properties Policy framework](#).

## Landlord accreditation

The council supports the London Landlord Accreditation Scheme and hosts courses on behalf of the scheme organisers. It also supports landlords by holding forums to enable them to discuss key issues with regards to property management. Further details can be found at [landlord accreditation scheme page](#).

## Other courses of action to be considered

A council cannot make a designation unless it has considered if they are any other courses of action that may achieve the objective for which the selective licensing scheme is intended to resolve.

The other courses of action that are open to the council are detailed within the attached [table](#) (PDF, 5kb). Each of these processes may assist with dealing with anti-social behaviour and poor management practices etc. in limited terms. It is considered that selective licensing should enable a co-ordinated strategy which links agencies and services together to obtain the desired shift in activity.

### **Impact for tenants in private rented accommodation**

Selective licensing would make sure that your landlord is managing and maintaining your home. The council would have a register of all licence holders and would be able to ensure that they act in a responsible manner including carrying out tenant vetting, issuing valid tenancy agreements, rent receipts and keeping all safety documents up to date.

If licence holders failed to abide by the licence conditions they could be prosecuted or have their licences revoked.

The council could identify rogue landlords and ensure that these individuals are targeted so that tenants are not exploited.

### **Impact for landlords of private rented accommodation**

Selective licensing will set clear guidelines that you must abide by, ensuring that a level playing field is achieved for your business. The council will be able to deal with and identify less competent or unscrupulous landlords.

It will be a criminal offence to rent out a property within one of the designated areas without a licence. On conviction, a landlord could be fined up to £20,000 and any rent collected during the unlicensed period could be reclaimed by the tenant or Local Housing Authority.

### **Impact for residents/neighbours of private rented accommodation**

It is estimated that about one third of the property in the Borough is in the private rented sector. Every property within the designated areas must be licensed. All licence holders must be fit and proper person and the licences will have clear conditions attached to them. The council will hold a register of all licence holders responsible for private rented property.

Monitoring and engagement with the licence holder by the council will help to improve the management of private rented property which should lead

to an overall environmental and physical improvement of the area i.e. less fly tipping, improved street scene and less anti-social behaviour as the licence holders and tenants, where necessary, will be held to account.

### **Landlord Public Register**

Once the council has issued a full licence, the information will be held on a public register which will be accessed via the council. It is our proposal that this will be an online register.

## EQUALITY ANALYSIS QUALITY ASSURANCE CHECKLIST

<b>Name of 'proposal' and how has it been implemented</b> (proposal can be a policy, service, function, strategy, project, procedure, restructure/savings proposal)	<b>Licensing of the Private Rented Housing Sector</b>
<b>Directorate / Service</b>	<b>CLC / Safer communities</b>
<b>Lead Officer</b>	<b>David Tolley, Head of Consumer and Business Regulation</b>
<b>Signed Off By (inc date)</b>	
<b>Summary – to be completed at the end of completing the QA (using Appendix A)</b> (Please provide a summary of the findings of the Quality Assurance checklist. What has happened as a result of the QA? For example, based on the QA a Full EA will be undertaken or, based on the QA a Full EA will not be undertaken as due regard to the nine protected groups is embedded in the proposal and the proposal has low relevance to equalities)	<div style="display: flex; align-items: center; margin-bottom: 10px;"> <div style="width: 20px; height: 20px; background-color: #00b050; margin-right: 10px;"></div> <div><b>Proceed with implementation</b></div> </div> <p>As a result of performing the QA checklist, the policy does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p> <p>As the report identifies, equalities considerations will be reviewed as the project progresses.</p>

Stage	Checklist Area / Question	Yes / No / Unsure	Comment (If the answer is no/unsure, please ask the question to the SPP Service Manager or nominated equality lead to clarify)
<b>1</b>	<b>Overview of Proposal</b>		
a	Are the outcomes of the proposals clear?	Yes	This report considers the outcome of the consultation process undertaken from 16 March 2015 till 12 July 2015, changes to legislation announced during the consultation and options

possible for the introduction of a housing licensing scheme for the private rented sector (PRS). A licensing scheme for PRS will enable the Council to impose a legal requirement, in the designated area, on all landlords to register, apply for a licence for each property they rent out, and comply with specific licence conditions thus giving the Council more power to tackle irresponsible letting of properties. Housing licensing schemes aim to improve standards of management in the PRS and reduce anti-social behaviour. Cabinet is asked to:

- 1 Agree, considering the options available, to introduced a Selective Licensing scheme within Weavers, Whitechapel and Spitalfields and Banglatown areas (pre May 22<sup>nd</sup> 2014 ward boundaries)
- 2 To confirm that the proposed designation criteria for introducing Selective Licensing, as outlined in this report have been met.
- 3 Agree to delegate to the Corporate Director of Communities Localities and Culture issuing of the required statutory notifications in relation to the commencement of the Selective Licensing scheme designation.
- 4 Agree the fee structure, licence conditions, and Housing Standards which it is proposed are adopted as part of scheme.
- 5 To agree that the Director of Communities Localities and Culture, depending on the duration of the ICT development and introduction, is delegated to bring in the lower fee for all applications to enable the scheme to be introduced sooner.

			<p>6 To agree that no further exemptions to the scheme should be considered in addition to the statutory exemptions.</p> <p>7 To agree if additional licensing should be considered further, subject to approval with the Mayor and Lead Members, once the extent of the Governments consultation of extending the definition of a licensable House in Multiple Occupation is known.</p>
b	<p>Is it clear who will be or is likely to be affected by what is being proposed (inc service users and staff)? Is there information about the equality profile of those affected?</p>	Yes	<p>Appendix five (Benefits of a selective licensing scheme) identifies a number of benefits for the Council, landlords, communities and tenants. It is known that ASB is higher in PRS rather than social rented accommodation. A licensing scheme will provide positive impact on landlord, tenants and a wider community through supporting responsible PRS management and reducing ASB.</p> <p>Once a scheme is introduced, landlords will be asked to pay fees. The 2011 Census shows that PRS had grown by 135% since the previous census in 2001 in the Borough. It is expected that the number of PRS will continue increasing.</p> <p>The report asks to consider the scheme is introduced in the following areas: Weavers, Whitechapel and Spitalfields and Banglatown (pre 22 May 2014 ward boundaries). It is estimated that there are 5,923 PRS in the Weavers, Whitechapel and Spitalfields and Banglatown wards.</p> <ul style="list-style-type: none"> <li>• Weavers: 1,741(31% in the area)</li> <li>• Whitechapel: 2,578 (44%)</li> <li>• Spitalfields and Banglatown: 1,604 (41%).</li> </ul> <p>In the Borough, it is estimated that around 37,000 properties consisting of 54% single family households and 46% in House of Multiple Occupation (HMO).</p>

			<p>The breakdown of online consultation respondents were:</p> <ul style="list-style-type: none"> <li>• Businesses/service providers: 4</li> <li>• Landlords/Managing Agents/Agents (the majority were from individual landlords): 103</li> <li>• Tenants/residents: 92.</li> </ul> <p>The most respondents of the above were white males within the age group of 30-39.</p>
<b>2</b>	<b>Monitoring / Collecting Evidence / Data and Consultation</b>		
a	Is there reliable qualitative and quantitative data to support claims made about impacts?	Yes	See above.
	Is there sufficient evidence of local/regional/national research that can inform the analysis?	Yes	The service conducted a consultation from 16 March till 12 July 2015. The service also commissioned research on PRS and ASB (Appendix Three).
b	Has a reasonable attempt been made to ensure relevant knowledge and expertise (people, teams and partners) have been involved in the analysis?	Yes	See above.
c	Is there clear evidence of consultation with stakeholders and users from groups affected by the proposal?	Yes	<p>See 4.23-4.45 of the report.</p> <p>The consultation consisted of information about the scheme being placed online, accompanied with an online questionnaire, public meetings, letters sent out to ward Councillors, landlords, managing agents, adverts placed in local and neighbouring Boroughs newspapers and direct letters to landlord and tenant groups and neighbouring local authorities.</p> <p>The online questionnaire was aimed at three distinct groups; landlords/managing agents/agent – tenants/residents – businesses or service providers. The service received just fewer than 200 online submissions.</p>
<b>3</b>	<b>Assessing Impact and Analysis</b>		
a	Are there clear links between the sources of evidence (information, data etc) and the interpretation of impact	Yes	The service collected equalities data of the online consultation respondents. The responses from Landlords/



	amongst the nine protected characteristics?		Managing Agents/ Agents and Tenants/Residents are analysed in the report.
b	Is there a clear understanding of the way in which proposals applied in the same way can have unequal impact on different groups?	Yes	The impact of a housing licensing scheme will be monitored.
<b>4</b>	<b>Mitigation and Improvement Action Plan</b>		
a	Is there an agreed action plan?	Yes	The report identifies steps following the approval of a designation (see 'Date of designation' in the report).
b	Have alternative options been explored	Yes	See 'Options' in the report.
<b>5</b>	<b>Quality Assurance and Monitoring</b>		
a	Are there arrangements in place to review or audit the implementation of the proposal?	Yes	Once the scheme is implemented, it will be monitored and reviewed.
b	Is it clear how the progress will be monitored to track impact across the protected characteristics??	Yes	The implementation of a housing licensing scheme will be monitored. ASB incidents will continue to be monitored.
<b>6</b>	<b>Reporting Outcomes and Action Plan</b>		
a	Does the executive summary contain sufficient information on the key findings arising from the assessment?	Yes	

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## **APPENDICES**

### **5.5 – Consultation of the late night levy for licensed premises**

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Appendix One: Estimated Income

**Late Night Levy income: Estimated Number of premises (levy charge)**

Operating Hours	Band A Levy charge (299)	Band B Levy charge (768)	Band C Levy charge (1259)	Band D Levy charge (1365)	Band D Multiplier Levy charge (2730)	Band E Levy charge (1493)	Band E Multiplier Levy charge (4440)
Midnight – 1.00am	12 (3588)	96 (73,728)	28 (35,252)	4 (5,460)	-	14 (20,902)	1(4,440)
1.00am - 2.00am	8 (2,392)	79 (60,672)	15 (18,885)	3 (4,095)	-	7 (10,451)	1 (4,440)
2.00am - 3.00am	-	21 (16,128)	10 (12,590)		-	1 (1,493)	-
3.00am - 4.00am	3 (897)	9 (6,912)	1 (1259)	-	-	-	-
4.00am – 5.00am	-	2 (1,536)	2 (2,518)	-	-	-	-
5.00am – 6.00am	-	-	1 (1,259)	-	-	-	-
24 hours	14 (4,186)	12 (9,216)	2 (2,518)	-	-	3 (4,479)	-

The multiplier applies to premises in rateable value Band D and E that primarily or exclusively sell alcohol

**Total Levy income: dependent of commencement of levy hour**

Commencement of Levy period	Estimated levy income (£)
Midnight – 1.00am	445,496
1.00am - 2.00am	163,169
2.00am -3.00am	64,991
3.00am -4.00am	34,780
4.00am – 5.00am	25,712
5.00am – 6.00am	21,658

Appendix Two

**Increase of licence fee per rateable band**

Rateable Band	Annual Fee (£)	Levy Charge (£)	Total Annual Fee with Levy charge (£)	Number of premises affected if levy commences at midnight
A	100	299	399	37
B	190	768	958	219
C	315	1,259	1,574	59
D	450	1,365	1,815	7
D with multiplier	900	2,730	3,630	0
E	635	1,493	2,128	25
E with multiplier	1905	4,440	6,345	2

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Appendix Three	A Band A	B Band B	C Band C	D Band D	E Band E	Multiplier Band E (with multiplier)
<b>Art Gallery/Arts Venue/Museum/</b>		<b>2</b>			<b>1</b>	
1am - 2am		1			1	
Midnight - 1am		1				
<b>Auction/Sale Rooms/Internet sa</b>		<b>1</b>				
24 hours		1				
<b>Bowling Alley</b>		<b>1</b>				
Midnight - 1am		1				
<b>Brewery</b>			<b>1</b>			
Midnight - 1am			1			
<b>Conference/function rooms</b>					<b>2</b>	
1am - 2am					1	
Midnight - 1am					1	
<b>Disco/Night Club/Comedy Club</b>		<b>2</b>	<b>3</b>			
2am - 3am			1			
3am - 4am		1	1			
4am - 5am		1				
5am - 6am			1			
<b>Finance Service Industry offic</b>					<b>1</b>	
24 hours					1	
<b>Fish Products Manufacturer</b>			<b>1</b>			
Midnight - 1am			1			
<b>Hospitality</b>			<b>1</b>			
Midnight - 1am			1			
<b>Hostel - purpose built</b>	<b>1</b>					
1am - 2am	1					
<b>Members/Social Club</b>	<b>1</b>		<b>3</b>			
2am - 3am			2			
Midnight - 1am	1		1			
<b>Mini-Market/Grocer</b>	<b>3</b>	<b>33</b>	<b>4</b>			
1am - 2am		14	1			
24 hours	1	6	2			
2am - 3am		1				
3am - 4am	1					

Appendix Three	A Band A	B Band B	C Band C	D Band D	E Band E	Multiplier	Band E (with multiplier)
Midnight - 1am	1	12	1				
<b>Newsagent/Sweet Shop/Tobacconi</b>		<b>4</b>					
Midnight - 1am		4					
<b>Off Licence/Wine Merchants</b>	<b>1</b>	<b>9</b>					
1am - 2am	1	1					
24 hours		4					
2am - 3am		1					
3am - 4am		1					
Midnight - 1am		2					
<b>Premise for hire - various eve</b>		<b>1</b>	<b>5</b>			<b>2</b>	
1am - 2am		1	3				
Midnight - 1am			1			2	
<b>Public House/Wine Bar-catering</b>		<b>54</b>	<b>19</b>	<b>5</b>	<b>6</b>		<b>1</b>
1am - 2am		14	3	1	2		
24 hours		1					
2am - 3am		9	2		1		
3am - 4am		1					
4am - 5am			1				
Midnight - 1am		29	13	4	3		1
<b>Public House/Wine Bar-no cater</b>	<b>1</b>	<b>3</b>	<b>2</b>				
1am - 2am		1					
2am - 3am			1				
4am - 5am			1				
Midnight - 1am	1	2					
<b>Restaurant/Cafe</b>	<b>7</b>	<b>76</b>	<b>19</b>		<b>9</b>		<b>1</b>
1am - 2am	2	35	8		3		1
2am - 3am		5	4				
3am - 4am		3					
4am - 5am		1					
Midnight - 1am	5	31	7		6		
<b>Ship/boat</b>	<b>21</b>						
1am - 2am	4						

Appendix Three	A Band A	B Band B	C Band C	D Band D	E Band E	Multiplier Band E (with multiplier)
24 hours	13					
3am - 4am	1					
Midnight - 1am	3					
<b>Shopping Area Common Parts</b>					<b>1</b>	
Midnight - 1am					1	
<b>Sports Club</b>			<b>1</b>			
Midnight - 1am			1			
<b>Supermarket / Hypermarket</b>		<b>1</b>			<b>3</b>	
1am - 2am		1				
24 hours					2	
Midnight - 1am					1	
<b>Takeaway Food</b>	<b>3</b>	<b>32</b>	<b>1</b>			
1am - 2am		11				
2am - 3am		5				
3am - 4am	1	3				
Midnight - 1am	2	13	1			
<b>Youth Club</b>		<b>1</b>				
Midnight - 1am		1				

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## Appendix Four – Crime Data against time periods

Crime Records where there is either feature codes that indicate the crime is alcohol related or the venue code is included in the "licensed" description. For the London Borough of Tower Hamlets, recorded between the 1st April 2014 - 31st March 2015.

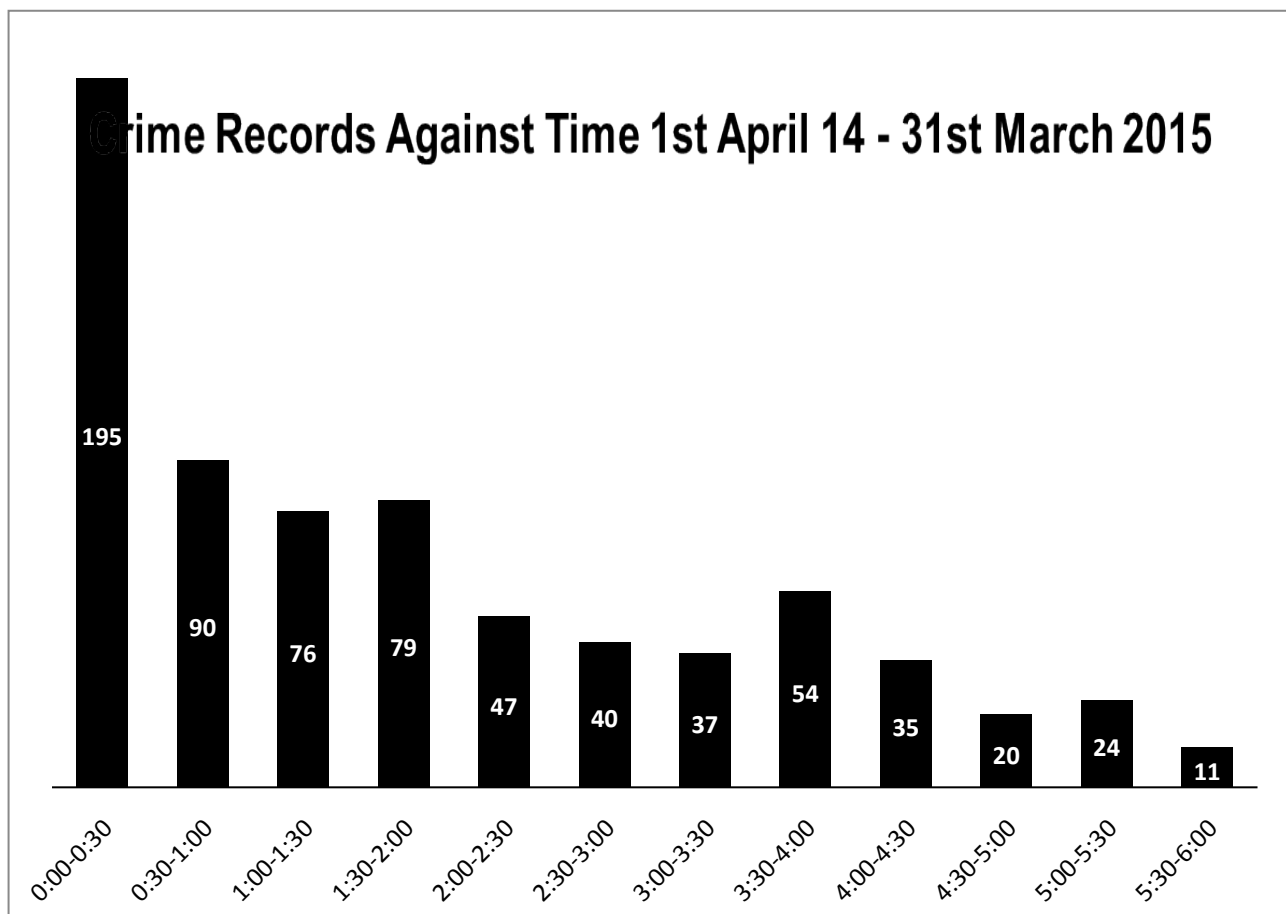
The data has been extracted in two ways;

1st - Where there is present on the CRIS record at least one of the following feature codes;

- Alcohol consumed at scene by suspect/accused
- Suspect/Accused had been drinking prior to committing offence
- Victim had been drinking prior to the offence

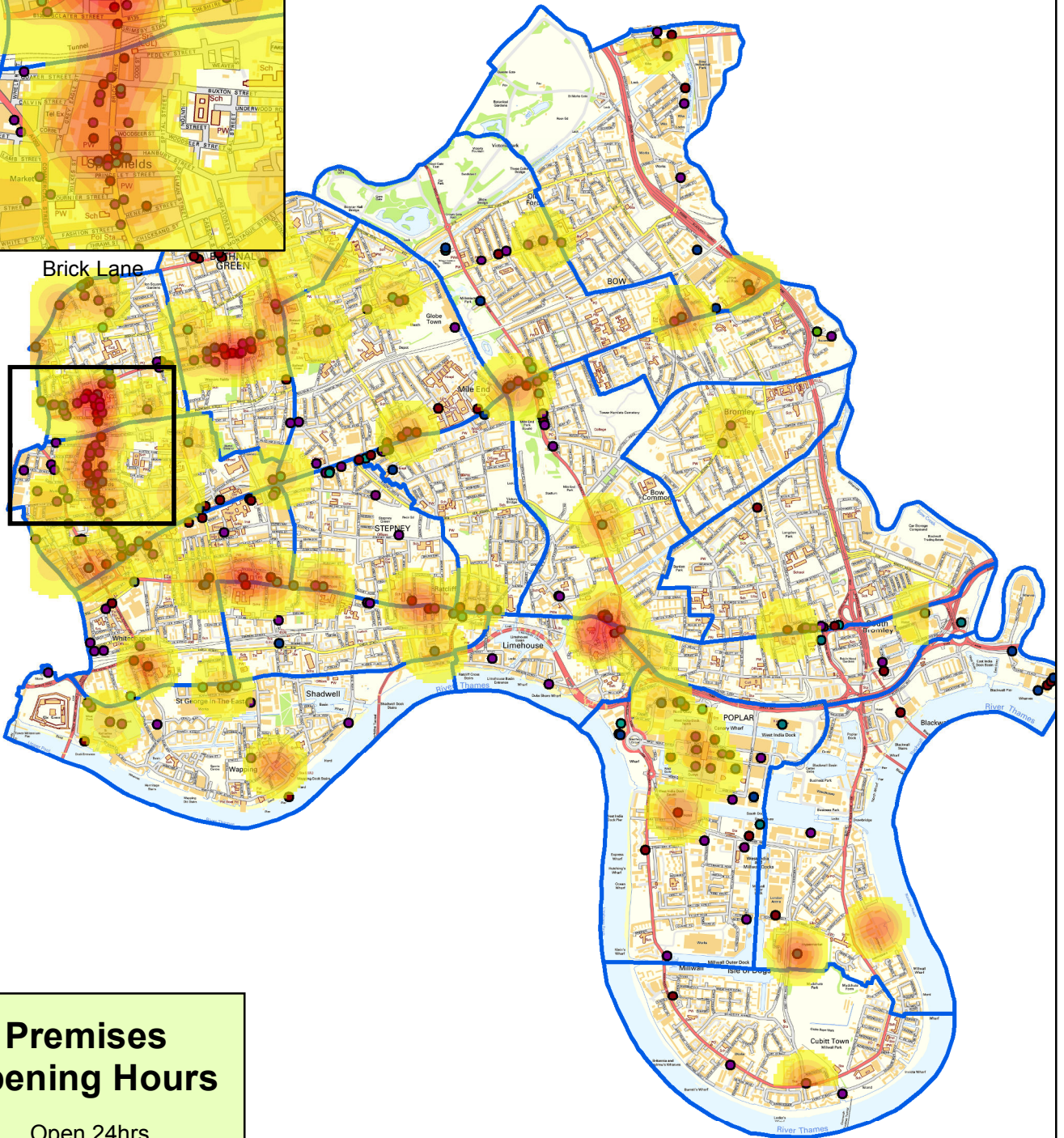
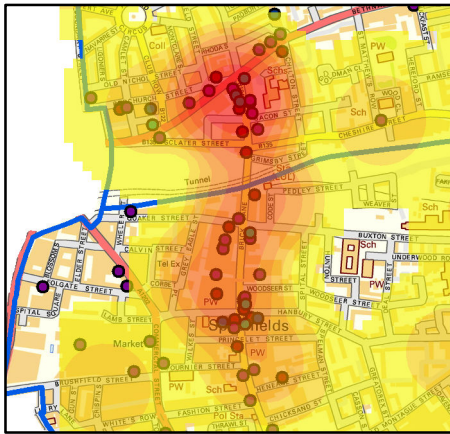
2nd - Where there is present on the CRIS record at least one of the following location codes;

- Public House
- Off Licence
- Wine Bar/Bistro
- Licensed Club (e.g. drinking/night/gambling club)
- Restaurants
- Cafes
- Pawnbrokers
- Take-Away Premises
- Other Licensed Premises
- Hotel/Guesthouse



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## Sep 14 to Aug 15 ASB/crime hotspot map for licensed premises between 12am and 1am



### Premises Opening Hours

- Open 24hrs
- Closing 12am-1am
- Closing 1am-2am
- Closing 2am-3am
- Closing 3am-4am
- Closing 4am-5am
- Closing 5am-6am

Between September 2014 and August 2015 there has been 155 incidents reported to the Council or the Police relating to a licensed premises between the hours of midnight and 1am. There has been a 19% increase in reported incidents compared to the same period in 2013 - 2014.

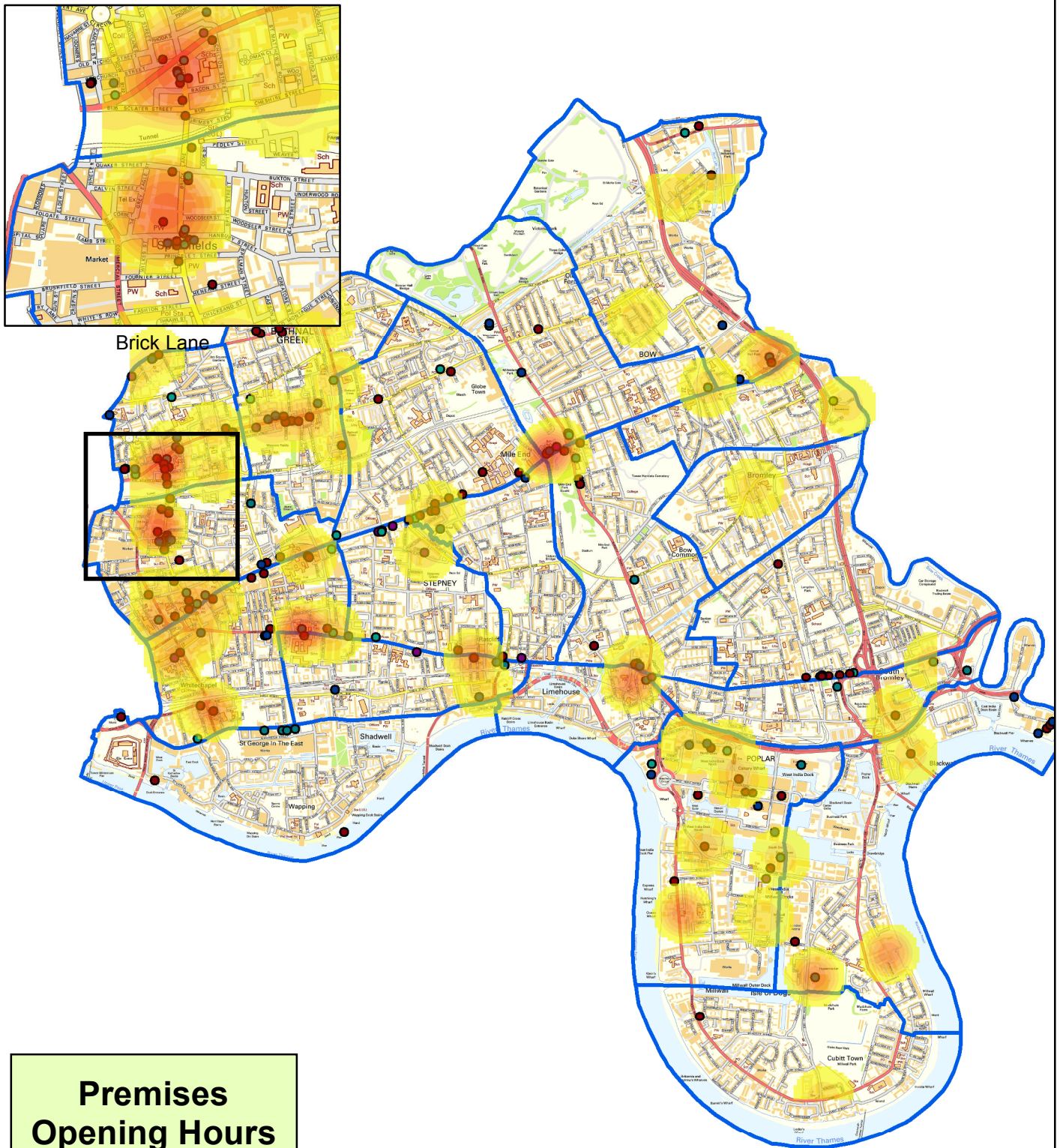
Brick Lane has the largest concentration of incidents with a total of 25 incidents which equates to 16%.

The premises with the most incidents between this period is the Urban Bar located on Three Colt Street which has 9 incidents (5%)

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## Sep 14 to Aug 15 ASB/crime hotspot map for licensed premises between 1am and 2am



### Premises Opening Hours

- Open 24hrs
- Closing 1am-2am
- Closing 2am-3am
- Closing 3am-4am
- Closing 4am-5am
- Closing 5am-6am

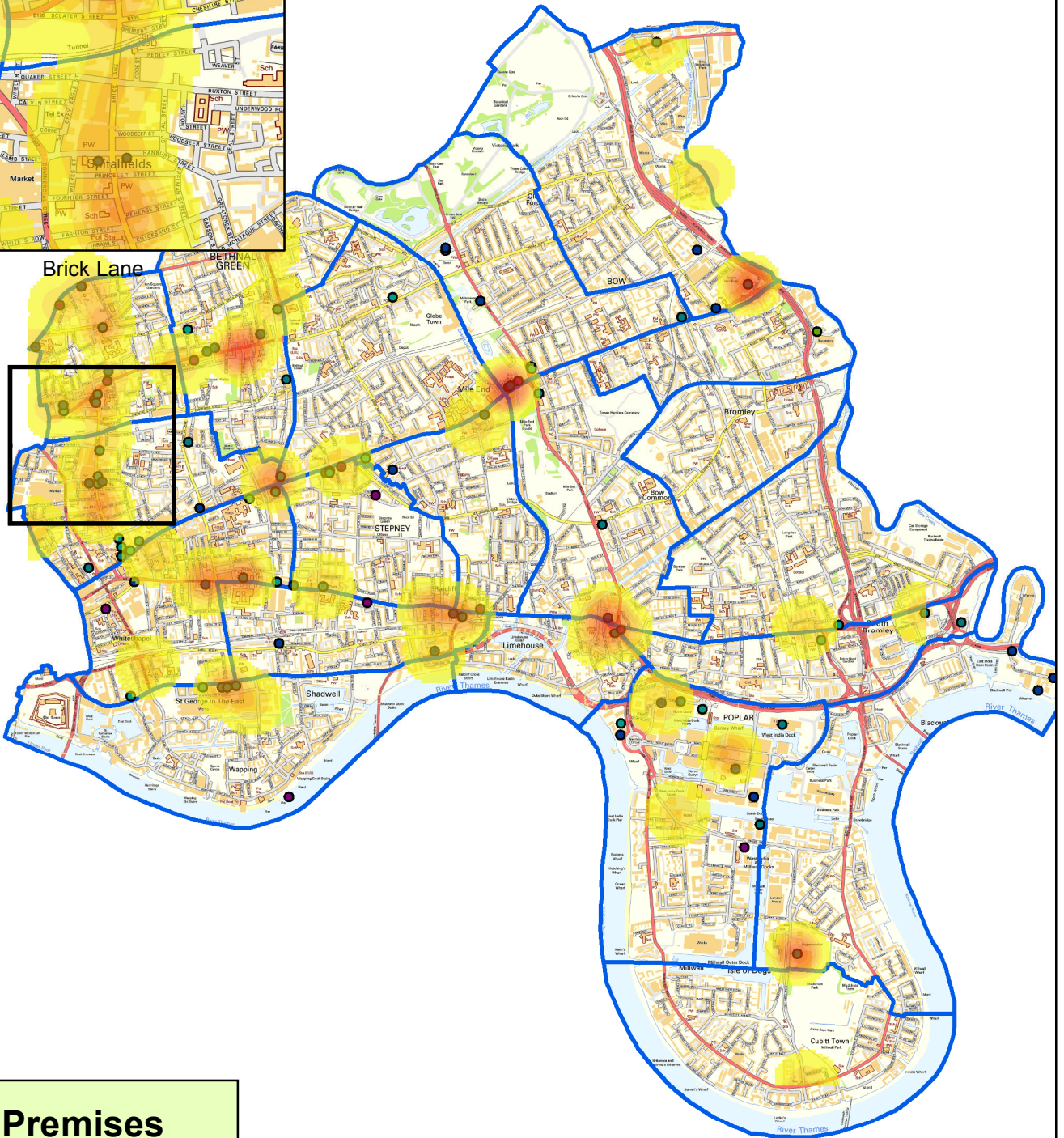
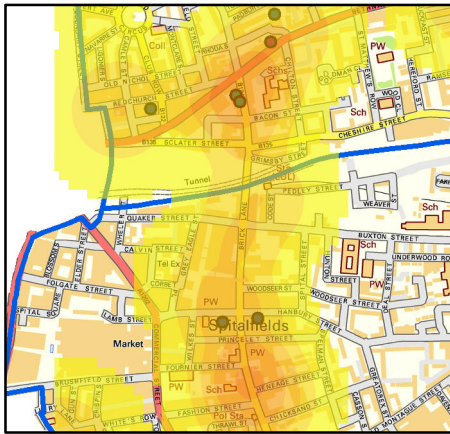
Between September 2014 and August 2015 there has been 132 incidents reported to the Council or the Police relating to a licensed premises between the hours of 1am and 2am. There has been a 41% increase in reported incidents compared to the same period in 2013 - 2014.

Brick Lane has the largest concentration of incidents with a total of 20 incidents which equates to 15%.

12 incidents have occurred between the hours of 1am and 2am at fast food outlets or pubs close to Mile End Station, of which 9 incidents occurred on a Friday/Saturday night.

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## Sep 14 to Aug 15 ASB/crime hotspot map for licensed premises between 2am and 3am



### Premises Opening Hours

- Open 24hrs
- Closing 2am-3am
- Closing 3am-4am
- Closing 4am-5am
- Closing 5am-6am

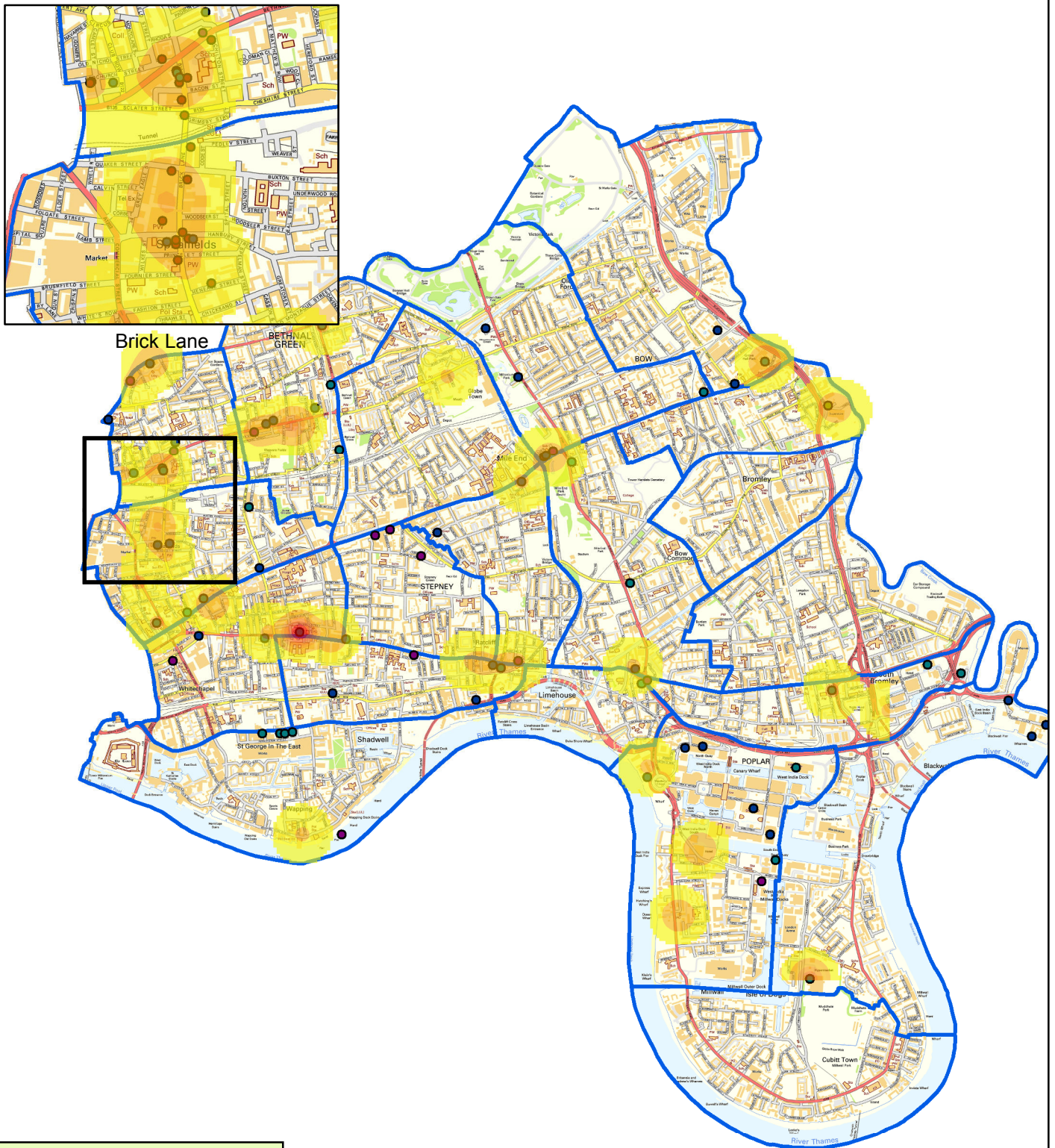
Between September 2014 and August 2015 there have been 79 incidents reported to the Council or the Police relating to a licensed premises between the hours of 2am and 3am. There has been a 12% reduction in reported incidents compared to the same period in 2013 - 2014.

Brick Lane has the largest concentration of incidents with a total of 8 incidents which equates to 10%.

7 incidents have occurred between the hours of 2am and 3am at fast food outlets or pubs close to Mile End Station. There has also been 7 incidents reported at premises' which supply alcohol in the Three Colt Street area

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## Sep 14 to Aug 15 ASB/crime hotspot map for licensed premises between 3am and 4am



### Premises Opening Hours

- Open 24hrs
- Closing 3am-4am
- Closing 4am-5am
- Closing 5am-6am

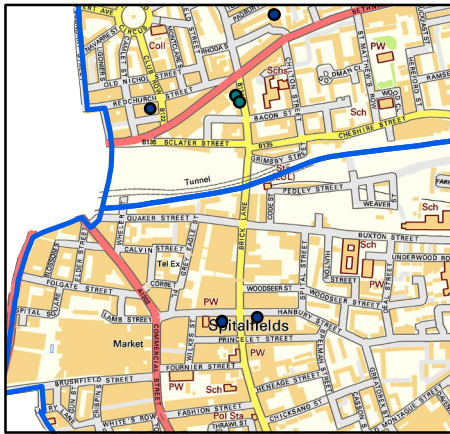
Between September 2014 and August 2015 there have been 54 incidents reported to the Council or the Police relating to a licensed premises between the hours of 3am and 4am. There has been a 12% reduction in reported incidents compared to the same period in 2013 - 2014.

Brick Lane has the largest concentration of incidents with a total of 7 incidents which equates to 12%.

The premises with the most number of incidents is McDonalds on Commercial Road with 6 incidents

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# Sep 14 to Aug 15 ASB/crime hotspot map for licensed premises between 4am and 5am



## Premises Opening Hours

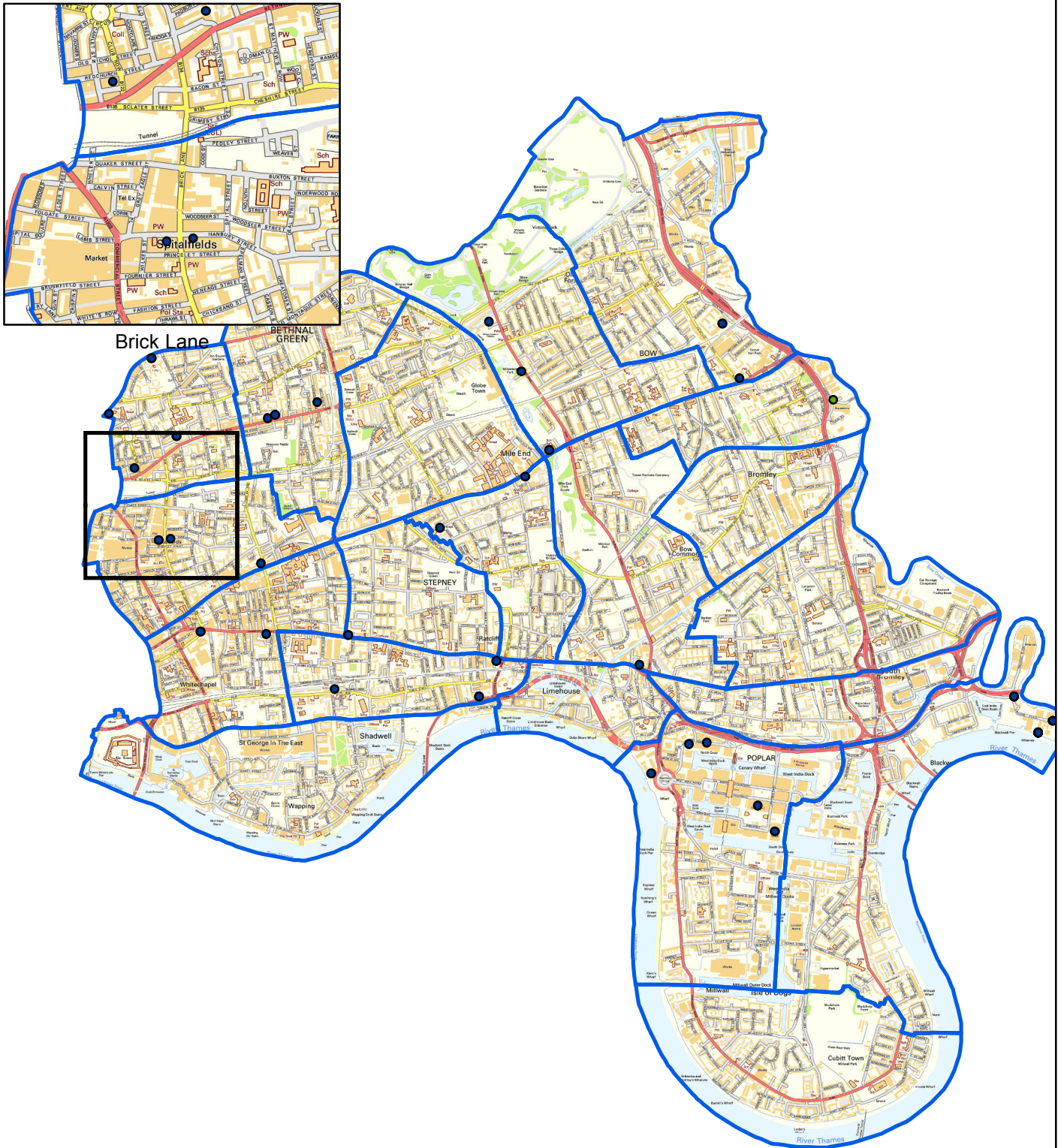
- Open 24hrs
- Closing 4am-5am
- Closing 5am-6am

Between September 2014 and August 2015 there has been 45 incidents reported to the Council or Police relating to a licensed premises between the hours of 4am to 5am. Due to an insufficient number of incidents it is not appropriate to produce a hotspot map.

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## Sep 14 to Aug 15 ASB/crime hotspot map for licensed premises between 5am and 6am



Between September 2014 and August 2015 there has been 42 incidents reported to the Council or Police relating to a licensed premises between the hours of 5am to 6am. Due to an insufficient number of incidents it is not appropriate to produce a hotspot map.

### Premises Opening Hours

- Open 24hrs
- Closing 5am-6am

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## **Appendix Six : Numbers of Crime Types**

Offence	Total
Personal Injury Collision	1
ABH	78
Administering Poison to Injure	1
Affray	5
Arson-Oth Prop-No Danger to Life	1
Assault On Constable	4
Att. Burglary in a Dwelling.	1
Att. Burglary Non Dwelling	1
Attempt Rape of Female 16 or over	1
Breach of Harassment Injunction	1
Burglary in a Dwelling.	5
Burglary Non Dwelling	20
Common Assault	77
Communications Act Offences	2
Course Of Conduct - Stalking	2
Crim Dam Dwelling - £500 to £5000	1
Crim Dam Dwelling - under £500	9
Crim Dam Other Building < £500	18
Crim Dam to M/Veh - £500 to £5000	3
Crim Dam to M/Veh - under £500	9
Crim Dam-Other Prop £500 to £5000	3
Crim Dam-Other Prop under £500	12
CrimDam-Other Building £500-£5000	2
Dangerous Driving	1
Domestic Incident	75
GBH with Intent	14
GBH/Serious Wounding	56
Harassment	7
Having Blade or Point in Public	4
Interference with Motor Vehicles	1
Kidnapping	1
Making Off Without Payment	4
Murder	1

## **Appendix Six : Numbers of Crime Types**

Non Crime Fraud - Action Fraud	2
Outraging Public Decency	1
Poss. Crack with Intent to Supply	1
Possess W/Intent Class a Heroin	1
Possession of Cannabis	11
Possession of Class a - Cocaine	7
Possession of Class a - Heroin	1
Possession of Class a - Mdma etc	2
Public Order Offence S4 Poa 86	8
Public Order Offence S4A Poa 86	4
Public Order Offence S5 Poa 86	6
Racial/Religious GBH/Wound	1
Racially/religious Agg ABH	2
Racially/religious Agg Assault	3
Racially/religious Agg fear of V	1
Racially/religious Agg harassment	4
Rape - Female under 13 by a Male	1
Rape of a Male Aged 16 or over	2
Rape of Female Aged 16 and over	12
Religiously Agg Harassment	1
Resist/Obstruct Constables	1
Robbery of Business Property	1
Robbery of Personal Property	53
Send letters etc. cause distress	1
Serious Personal Injury Collision	2
Sexual Assault Female under 13	1
Sexual Assault On a Female	9
Sexual Assault On a Male	1
Shoplifting Value under £200	1
Theft by an Employee	2
Theft from Motor Vehicles	2

## **Appendix Six : Numbers of Crime Types**

Theft From The Person of Another	78
Theft in a Dwelling	9
Theft Not Classified Elsewhere	116
Theft of Pedal Cycles	2
Threat to Commit Criminal Damage	2
Grand Total	773

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**Appendix Seven**  
**Late Night Levy – proposed consultation**

**Guidance on the consultation and your responses to this licensing review**

The consultation covers the introduction of a late night levy  
At the end of each section, there are questions on which we are seeking your comments  
The closing date for responses will be the XXXXX

**How to respond**

There are a number of ways you can respond the consultation –  
Responses can be made either:

By email to: [licensing@towerhamlets.gov.uk](mailto:licensing@towerhamlets.gov.uk)

By post to: Environmental Health & Trading Standards,  
London Borough of Tower Hamlets  
Town Hall  
Clove Crescent  
London  
E14 1BY

Or by completing the online form which can be found at: XXXXXXXXXXXX

**Freedom of information statement**

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes (such as the Freedom of Information Act 2000 and the Data Protection Act 1998 (DPA)). If you want information that you provide to be treated as confidential, please explain to us why you regard the information as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. We will process your personal data in accordance with the DPA and in most circumstances this will mean that your personal data will not be disclosed to third parties.

## Late night Levy

### Background Information

The purpose of the Levy is to assist Councils and the police manage and improve the night time economy. The money can be used for a range of things and can be given to other agencies where they can assist in the reduction of crime and disorder or improve the night time economy.

This is a discretionary power for Councils to require a fee from premises that sell alcohol between midnight and 6am. The council can decide what times the levy will operate (e.g. the levy could be imposed on premises that operate between midnight and 6am).

If introduced, the levy will apply to any licensed premises that sells alcohol that operates within the set times of the levy. The Council does not have the power to limit the levy to certain parts of the Borough.

It would apply to alcohol sales on or off premises.

The Council must consider the desirability of introducing a levy in relation to the costs of policing and other arrangements for the reduction of prevention of crime and disorder, in connection with the supply of alcohol consumption between midnight and 6am.

### How can the money be used?

The net levy revenue must be split between the Council (30%) and the Mayor's Office for Policing and Crime, however, it is proposed that the levy is allocated to Tower Hamlets through the current Community Safety Partnership.

### How much will licensees pay?

The levy is dependent on the rateable value of the premises and the levy amounts are set by the Government.

Table 1: Cost of Levy to each Rateable value

<b>Rateable Value</b>		<b>Annual Levy</b>	<b>Cost per week</b>
Band A	Nil - £4,300	£299	£5.75
Band B	£4,301-£33,000	£768	£14.76
Band C	£33,001-£87,000	£1,259	£24.21
Band D	£87,001-£125,000	£1,365 * (£2,730)	£26.25 (£52.50)
Band E	£125,001 and above	£1,493 * (£4,440)	£28.71 (£85.38)



\*Those that are band D or E where the main use is the sale for consumption on the premises will pay an additional fee.

Most premises in Tower Hamlets are rated as band B or C.

Every licensed premise, with the ability to open between the times set by the Council, will have to pay the levy. The Council has discretion to either exempt or allow a reduction in the amount of levy in some specific cases. This consultation lists all the possible exemptions and reductions and explains the current proposal and whether they will be used.

### **How much money will the late night levy raise?**

The final amount is difficult to estimate but will depend on:

- What time the levy will start (midnight or 1am or later?)
- How many premises will be open during the late night period
- Which exemptions and reductions will be applied by the council

Due to the number of potential exemptions or reductions and the trade amending their operating hours, it is difficult to provide an exact income if the levy is introduced. Theoretically it may range from £20,000 to £450,000 per year subject to all of these variables.

### **Will there be a transition period and when will it start?**

The levy must be approved by the Council who will agree when it should start and any transition periods.

Any licensee who wishes to amend their license and reduce the operating hours to before the time set for the levy can do so via a free minor variation. We propose a 3 month period for these free variations will be provided.

### **How will the levy be collected?**

The Council will collect the levy at the same time as the licence annual fee

### **What happens if a licence doesn't pay?**

The money can be recovered as a civil debt, but it would also result in the premises licence being suspended; this scenario would mean that the business could not operate until the levy has been paid.

### **Will the need for the levy be reviewed?**

All aspects of the levy will be reconsidered at least every five years to ensure that the policies are still appropriate

## **LATE NIGHT LEVY CONSULTATION**

### **USE OF THE LEVY MONEY**

The Council can recover all costs associated with the administration of the levy system. These are the costs that the Council incurs with the introduction or variation, administration, collection and enforcement of the levy.

The amount left over (the net levy revenue) must be split between the Council and the Mayor's Office of Policing and Crime (MOPAC) but MOPAC must receive at least 70%.

The Council is restricted as to what it can use the funds for; it must be used to fund services that it provides to tackle late night alcohol-related crime and disorder and services connected to the management of the night-time economy.

### **Proposal**

It is proposed that the net amount collected is initially allocated on the 70/30 split, but it is to be held in a central trading account. The allocation of this funding is then managed by the Community Safety Partnership. This team has responsibility for liaison with the both public and voluntary sector on community safety issues, which will provide transparency and will allow greater flexibility in the use of the funds from year to year.

### **How will the money be spent?**

We wish to seek views on the use of levy funds. Possible ideas that could be considered by the Partnership include:

- Taxi Marshalls
- Street Pastors
- Street Cleaning
- Enforcement Initiatives – Night time enforcement officers
- Personal Safety Initiatives
- Health Care Facilities
- Additional Police or private security
- Financial support could be provided to assist schemes that promote improved management of licenced premises, such as Best Bar None or Pub watch

### **THE LATE NIGHT SUPPLY PERIOD**

The late night supply period must begin at or after midnight, and end at or before 6am. Only premises that are authorised to sell or supply alcohol within that period are subject to the levy. Within those parameters, the council has the discretion to actually set the period, but it must be the same every day.

### **Proposal**

The Council proposes to set the late-night supply period to run from midnight to 6am. It is considered that all premises opening during this impact on the need for additional resources to address the consequences of the late night economy and so should contribute to the costs incurred by the Police and the Council.

### **EXEMPTIONS FROM THE LEVY**

There may be some premises which the Council feels should not have to pay the levy. The categories of premises that can be exempt are set in regulations.

The following premises may be allowed an exemption:

**Premises with overnight accommodation**

This exemption does not apply if alcohol is served during the late night supply period to members of the public who are not staying overnight

**Proposal**

EXEMPT: It is not considered that these premises contribute significantly to the detrimental effects of the late night economy.

**Theatres and cinemas**

This exemption applies if alcohol is served during the late night supply period only for consumption on the premises to ticket holders, participants in the production or invited guests to private events; they must be bona-fide theatres or cinemas and the sale of alcohol must not be their primary purpose.

**Proposal**

EXEMPT: It is not considered that these premises will contribute significantly to the detrimental effects of the late night economy

**Bingo Halls**

These premises must have licenses under the Gambling Act 2005 and the playing of bingo must be the primary activity.

**Proposal**

EXEMPT: It is not considered that these premises will contribute significantly to the detrimental effects of the late night economy.

**Community Amateur Sports Club**

These are clubs registered as Community Amateur Sports Clubs that are entitled to various tax concessions including relief from business rates.

**Proposal**

EXEMPT: The type of premises covered by CASC range from table tennis, cricket to rugby. Overall it is not considered that these premises will contribute significantly to the problems of the late night economy and their exemption will have minimal impact on the levy.

**Community Premises**

These are premises that form part of the church hall, chapel hall, village hall, parish hall, community hall or other similar buildings.

**Proposal**

EXEMPT: It is not considered that these premises will contribute significantly to the detrimental effects of the late night economy.

**Country Village Pubs**

These pubs are solely designated in rural settlements, with a population less than 3000

**Proposal**

NOT TO BE EXEMPT: Currently, we do not believe there are any such premises within Tower Hamlets

**Business Improvement Districts (BIDS)**

These premises are within a BID, which are subject to the BID levy and where the purpose for which the BID arrangements were established, included purposes which are likely to result in the reduction or prevention of crime and disorder in relation to the supply of alcohol between midnight and 6am

**Proposal**

NOT EXEMPT: There are currently no BID in Tower Hamlets

**New Year's Eve**

Relating to premises which are authorised to sell alcohol between midnight and 6am, ONLY on New Year's Day.

**Proposal**

EXEMPT: The operation of licensed premises beyond midnight on only one day in each year will have minimal impact on the overall operation and costs of the late night economy. If there is no exemption, licensed premises will need to apply for a temporary event notice, which will not attract any levy and will add administrative burdens on businesses and the Council to process these applications.

**Reductions from the levy**

The council can allow a 30% reduction of the levy for two types of premises; there can only be one reduction even for premises that fall within both categories.

**Small business rate relief**

A reduction can be granted in respect of premises that only supply alcohol for consumption on the premises, where the rateable value is £12000 or less, and which receive Small Business Rate Relief.

**Proposal**

NOT TO PROVIDE A REDUCTION: These premises receive business rate relief to assist in their viability; however, if they operate in the late night period, there is no reason to suggest that they are less likely than similar businesses to contribute to the detrimental effects of the late night economy. Due to their size they are more likely to be liable to the lower levy amounts.

**Members of business-led best practice schemes**

A reduction can be granted in respect of premises that participate in business led best practice schemes, such as The Best Bar None scheme. In this way, the levy can be used to promote and support participation in such schemes. The scheme has to comply with benchmarks specified in regulations and statutory guidance.

**Proposal**

CONDITIONAL REDUCTION: for The Best Bar None scheme, that raise standards will be beneficial to the management of the late nigh economy. It is essential that any scheme has robust and stringent standards with disciplinary mechanisms to remove non-compliant businesses.

**HOW AND WHEN WOULD WE INTRODUCE THE LATE NIGHT LEVY?**

It is proposed that licenses are given 3 months to apply for their free minor variation to reduce licensed hours to avoid late night levy.

In order to allow for the consultation, adoption and transition process to be followed it is considered that the earliest date for implementation would be XXXXXX

**Consultation Form**

**We would like your views on the following  
The late night levy consultation**

Do you believe it is appropriate for the council to introduce the levy?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Do you agree with premises that obtain the Best Bar None Award	Yes <input type="checkbox"/>	No <input type="checkbox"/>

being given a 30% reduction on the levy?		
Do you agree the Levy should start at midnight?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

**Do you agree with the proposed exemption and reductions?**

Premises with overnight accommodation? Proposal: EXEMPT	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Theatre and cinemas Proposals: EXEMPT	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Bingo Halls Proposal: EXEMPT	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Community Amateur Sports Club Proposal: EXEMPT	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Community Premises Proposal: EXEMPT	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Country Village Pubs Proposal: NOT TO BE EXEMPT	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Business Improvement Districts (BIDs) Proposal: NOT EXEMPT	Yes <input type="checkbox"/>	No <input type="checkbox"/>
New Year's Eve Proposal: EXEMPT	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Small Business Rate Relief Proposal: NOT TO PROVIDE A REDUCTION	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Members of Business-led Best Practice Schemes Proposal: CONDITIONAL REDUCTION FOR BEST BAR NONE SCHEME	Yes <input type="checkbox"/>	No <input type="checkbox"/>

**Do you have any comments or suggestions not already covered?**

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**How do you propose the levy is target on the following areas?**

- Reduction or prevention of crime and disorder      Yes       No
- Promotion of public safety      Yes       No
- Reduction or prevention of public nuisance      Yes       No
- Cleaning of any relevant highway or relevant land      Yes       No


**Are you:**

- A licensed business with a licence to all alcohol from midnight – 6am
- A licensed business with a licence that does not permit the sale of alcohol
- A non-licenced business
- A member of the public
- Other

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## Appendix Eight – Equalities Impact Assessment

### EQUALITY ANALYSIS QUALITY ASSURANCE CHECKLIST

<b>Name of ‘proposal’ and how has it been implemented</b> (proposal can be a policy, service, function, strategy, project, procedure, restructure/savings proposal)	<b>Late Night Levy (LNL)</b>
<b>Directorate / Service</b>	<b>CLC/ Consumer and Business Regulation</b>
<b>Lead Officer</b>	<b>David Tolley, Head of Consumer and Business Regulation</b>
<b>Signed Off By (inc date)</b>	<b>Andy Bamber, Service Head, Safer Communities</b>
<b>Summary – to be completed at the end of completing the QA (using Appendix A)</b> (Please provide a summary of the findings of the Quality Assurance checklist. What has happened as a result of the QA? For example, based on the QA a Full EA will be undertaken or, based on the QA a Full EA will not be undertaken as due regard to the nine protected groups is embedded in the proposal and the proposal has low relevance to equalities)	<div style="display: flex; align-items: flex-start;"> <div style="margin-right: 10px;">  </div> <div> <p><b>Proceed with implementation</b></p> <p>As a result of performing the QA checklist, the proposal does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p> <p>This proposal is to ask the decision-making body to consider whether a Late Night Levy (LNL) should be proposed in the Borough. Once it is decided that the adoption of a LNL is to be considered, further data will be collected and a consultation process will be held.</p> </div> </div>

Page 197

		<b>Yes /</b>	<b>Comment (If the answer is no/unsure, please ask</b>
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Stage	Checklist Area / Question	No / Unsure	the question to the SPP Service Manager or nominated equality lead to clarify)
1	Overview of Proposal		
a	Are the outcomes of the proposals clear?	Yes	<p>The Council can agree to impose an additional financial levy on licensed premises that retail alcohol within the Borough, to pay for managing the night time economy. This report asks to consider whether a Late Night Levy (LNL) should be applied to those premises in the Borough that sell alcohol between a selected period of midnight and 6.00am. The decision-making body is asked to:</p> <ul style="list-style-type: none"> <li>• Note the adoptive powers under the Police Reform and Social Responsibility Act 2011</li> <li>• Consider and comment on whether the Council should consult on the adoption of the powers for introducing a late night levy</li> <li>• Consider and comment on the parameters for the levy</li> <li>• Comment on the proposal to commit the funding to Night-time Enforcement Officers.</li> </ul> <p>If a consultation is to take place the following matters need to be determined:</p> <ul style="list-style-type: none"> <li>- When the levy shall be applied between midnight and 6.00am</li> <li>- To agree to consult with the Mayor’s Office for Policing and Crime (MOPAC) for the introduction of a levy on how the levy will be allocated</li> <li>- To determine any exemptions or reductions that may be applied to businesses</li> <li>- To consider how the extra income for the LNL will be allocated within the Licensing Team.</li> </ul> <p>The aim of LNL is to empower local authorities to charge</p>



			<p>businesses that supply alcohol late into the night for the extra enforcement costs that the night-time economy generates for police and licensing authorities. The levy fee is set by Government and is determined by the rateable value of the property where the alcohol sales take place. The fee is split between the Metropolitan Police and Local Authority on a 70:30 basis. This levy enables the Local Authority to raise a contribution from late opening alcohol suppliers towards policing the night-time economy. Based on the current number of premises opening between midnight and 6am, and using midnight as the point the levy commences, the additional income would be in the region of £306,500.</p> <p>The local authority must allocate their proportion of the net levy amount on the following activities:</p> <ul style="list-style-type: none"> <li>- Reduction or prevention of crime and disorder</li> <li>- Promotion of public safety</li> <li>- Reduction or prevention of public nuisance</li> <li>- Cleaning of any relevant highway or relevant land in its area.</li> </ul> <p>If the local authority chooses to introduce the levy in their area, all licensed premises which are authorised to sell alcohol within the levy period will be able to make a free minor variation to their licence before the levy is introduced, so as to avoid the levy.</p>
b	Is it clear who will be or is likely to be affected by what is being proposed (inc service users and staff)? Is there information about the equality profile of those affected?	Yes	<p><u>Improvement of safety and public realm</u> LNL is to enable the Council to better respond to the safety and street-cleaning requirements generated by the night-time economy. The levy must cover the whole of the licensing authorities' area. If this is introduced, responding to the requirements generated by the night-time economy will be better resourced and the neighbourhoods will be safer and</p>

cleaner. This will benefit residents, especially those who live in the vicinity of the areas having strong night-time economy. Data of the 2011 Census and other ONS data provide the equalities profile of the residents.

There is no data on protected characteristics of customers who buy alcohol during the midnight and 6am. However, some data (e.g. London ambulance alcohol-related calls and enforcement data on street drinking perpetrators) may inform the impact of this proposal on customers.

#### Licensed premises

All licensed premises that are permitted alcohol for the times when the levy will apply (between midnight and 6am) will be charged for late night opening. These licensed premises will be allowed to make a free minor variation to their licence and avoid the levy, before the levy is introduced.

The majority of the license holders are companies, who may be owned by people in different equality strands from those who operate the business premises in the Borough. The technical implications in developing an equalities strand of the Council's business database has been reviewed by D&R that have corporate lead responsibility for Business related data.

Consultation, which is required to be held prior to the introduction of levy, may help identify the profile of the affected businesses.

#### Consultation

If this proposal is agreed, the Council must consult before the introduction of the levy. The consultation will be published online and in a local newspaper. Details of the proposal need to be sent to MOPAC, the relevant chief officer of the police

			and all licensed premises that are permitted alcohol for the times when the levy will apply.
<b>2</b>	<b>Monitoring / Collecting Evidence / Data and Consultation</b>		
a	Is there reliable qualitative and quantitative data to support claims made about impacts?	Yes	Appendix four shows crime and alcohol related calls. Appendix 5 a-f shows ASB/crime hotspot map for licensed premises of each hour between midnight and 6am. If the proposal is agreed by Cabinet, the Council will consult the stakeholders before the introduction of the levy.
	Is there sufficient evidence of local/regional/national research that can inform the analysis?	Yes	Appendix One identifies the number of premises that would be affected by the proposal and estimates the total levy income depending on commencement of levy hour.  The impact of the night-time economy on the community has been widely researched. For example, GLA and Camden Council published 'Camden Town Night Time Economy Research' in 2004. Locally, the service has researched and analysed the issue for a number of years. For example, the Cumulative Impact Policy – Brick Lane Area report submitted to Council in July 2013 includes the impact of the night-time economy on the community.
b	Has a reasonable attempt been made to ensure relevant knowledge and expertise (people, teams and partners) have been involved in the analysis?	Yes	If the Council agree the proposal, a consultation process will be held.
c	Is there clear evidence of consultation with stakeholders and users from groups affected by the proposal?	Yes	Consultation is required to be held prior to the introduction of the levy.
<b>3</b>	<b>Assessing Impact and Analysis</b>		
a	Are there clear links between the sources of evidence (information, data etc) and the interpretation of impact amongst the nine protected characteristics?	Yes	As above, performance indicator data including London ambulance alcohol-related calls, the enforcement data on street drinking perpetrators and ARS may inform the impact of this proposal.
b	Is there a clear understanding of the way in which	Yes	As above, the majority of the license holders are companies,

	proposals applied in the same way can have unequal impact on different groups?		who may be owned by people in different equality strands from those who operate the business premises in the Borough. Although the technical implications in developing an equalities strand of the Council's business database has been reviewed by D&R, a consultation process may identify unequal impact on different groups of affected businesses.
<b>4</b>	<b>Mitigation and Improvement Action Plan</b>		
a	Is there an agreed action plan?	Yes	This proposal will be submitted to the various decision-making bodies.
b	Have alternative options been explored	Yes	'Do nothing' option has been considered.
<b>5</b>	<b>Quality Assurance and Monitoring</b>		
a	Are there arrangements in place to review or audit the implementation of the proposal?	Yes	It will be considered by the various decision-making bodies.
b	Is it clear how the progress will be monitored to track impact across the protected characteristics??	Yes	If this proposal is agreed and implemented, relevant performance indicators will be monitored to identify the impact of this proposal.
<b>6</b>	<b>Reporting Outcomes and Action Plan</b>		
a	Does the executive summary contain sufficient information on the key findings arising from the assessment?	Yes	

## **APPENDICES**

### **5.8 – Determination of School Admission Arrangements 2017/18**

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**TOWER HAMLETS CHILDREN'S SERVICES**  
**Proposed Admissions Arrangements for**  
**Community Nursery Schools and Classes**  
**2017-18**



**Version:** 1.0  
**Date issued:** 1<sup>st</sup> November 2015  
**Prepared by:** Pupil Services  
Children's Services  
Directorate



## 1. Introduction

- 1.1 Nursery education is provided in a range of settings in Tower Hamlets. This policy is for nursery education provided in community schools. Children will normally attend either a nursery school or a nursery class attached to a primary school. Some schools provide nursery education in an Early Years Unit attached to their school (EYU). The EYUs accept children aged from three to five years inclusive. All of these schools offer a mixture of part time places (either a morning or an afternoon); and full time places.
- 1.2 In this policy the term 'school' refers to a nursery school, a nursery class attached to a primary school or a school with an EYU.

## 2. Nursery Entitlement

- 2.1 All children aged three and four are entitled to 15 hours a week free nursery education during school term times (38 weeks a year), from the term following their third birthday.
- 2.2 Parents considering sending their child to a playgroup as well as a nursery class may wish to think about what impact this would have on their child and how they would cope with the two environments. The adjustment is often very demanding and confusing for children of this age and much of the benefit from either setting could be lost. Once children take up a nursery place, it is in their interests to remain at that school until they have to move on. Children take at least a term to settle and can find it very upsetting to move at this stage. Transfers are only considered if a family has moved from the area or on exceptional grounds.

## 3. Age of Admission to a Nursery School/Class

- 3.1 Parents who would like a nursery place for their child should get in touch with the preferred school when the child reaches the age of two.
- 3.2 The actual age at which a child can start will depend on the number of places available but will not be before the term after they turn three. In exceptional circumstances a child may start in the term they turn three but this will need agreement from the Local Authority.

## 4. Applying for a Place

- 4.1 Applications can be made by parents or carers with parental responsibilities who are residents of Tower Hamlets and professionals with parents' agreement. Application forms are available from schools, nurseries and Children Centres.
- 4.2 The closing date for applications is **15th January 2017** and the date on which families are sent notification of the outcome is **8th May 2017**.
- 4.3 Further information on the nursery schools and classes and how to apply for a place is set out in the Local Authority's school admissions booklet, 'Starting School in Tower Hamlets'.

## 5. How Decisions are Made

- 5.1 Individual schools will make decisions on applications for nursery places in accordance with the criteria and arrangements set out below. Children who attend a school's nursery class do not have priority for admission to the reception year as decisions on primary school admissions are taken separately.



## 6. Oversubscription Criteria

- 6.1 If a community school receives more nursery applications than places available the decision on whether or not a place can be offered will be made in accordance with the admission criteria set out in priority order below:
1. Children looked after by the local authority including adopted children who were previously looked after and children who leave care under a special guardianship or residence order;
  2. Children for whom it is deemed there is strong educational, medical or social reason to attend the school applied to (**See note 1**);
  3. Children living within the catchment area who have a sibling attending the school (including the school of separate infants and junior schools) and who will continue to do so on the date of admission (**See Note 2**);
  4. Children who live within the catchment area of the school and for whom the school applied for is their nearest community school within the catchment area;
  5. Other children from within the catchment area of the school;
  6. Children living outside of the catchment area of the school applied to.

In the event of oversubscription within categories 3, 4, 5, and 6 above, priority will be given to children who live closest to the school by the shortest walking distance. A digitised Ordnance Survey map is used to measure the distance from the home address to the school's designated official entrance.

**Note 1:** This can include the parents', carers' or other family members' medical conditions and the family's social needs. Parents must complete the relevant section on the application form and attach medical and/or social reports from a suitable professional (e.g. a doctor or social worker) to support the application.

**Note 2:** Includes the sibling of child who does not live within the school's catchment area, but who was admitted before the start of the 2015/16 school year. For this purpose "sibling" means a whole, half or step-brother or step-sister resident at the same address.

**Note 3:** A digitised Ordnance Survey map is used to measure the distance from the home address to the school's designated official entrance.

**Note 4:** Private, independent, academy and voluntary aided school nurseries have their own admission policy.

**Note 5:** Tie- Break - If a school receives more applications for children in the catchment area than there are places available, the school must decide who to offer places to. The 'tie-break' used gives priority to children who live closest to the school measured by the shortest walking distance. This reduces the possibility of a family having to undertake an unreasonable journey to a school and provides equal opportunity for families living in parts of the borough where there are a limited number of schools.

## 7. Catchment Area

- 7.1 The school catchment area is the defined area in which a school is located. It is generally bounded by major roads and/or railway/canal. The catchment area for each Tower Hamlets Community school is set by the Local Authority and designed to ensure that each address in the borough falls into the catchment area of local school. Details of community schools within the catchment area for a particular address can be viewed on the Local Authority's website: <http://www.towerhamlets.gov.uk/equalchance>.

## 8. Full and Part-Time Places

- 8.1 Once places are offered, children are then allocated full-time or part-time places. This is done in accordance to the following list of priority:

<b>Priority 1</b>	Children with Special Educational or Complex Needs
<b>Priority 2</b>	Children looked after by the Local Authority including adopted children who were previously looked after and children who leave care under a special guardianship or residence order.
<b>Priority 3</b>	Children for whom it is deemed there is strong medical or social reason.
<b>Priority 4</b>	Children of working parents or parents who are studying.

- 8.2 It is important that the Common Application Form is completed and all relevant information is provided to support your child's application. The information on the form will not only determine admission to the school; it will also help decide whether your child is offered a full-time or part-time place.

## 9. Late Applications

- 9.1 Applications received after the closing date will be treated as late applications unless there is evidence to show that the application or amendment could not reasonably have been made on time. Late applications will be given a lower priority and will be dealt with after all on time applications in the first round of offers are made. Where a school is oversubscribed late applications will be refused and placed on the waiting list in accordance with the admission criteria.
- 9.2 Where the Local Authority has determined there are exceptional circumstances for the late submission of an application it will be treated as 'on time' and, where possible, considered alongside existing applications.

## 10. Waiting List

- 10.1 There is no requirement for schools to maintain a waiting list, however if schools are going to maintain a list then this should be kept in line with the Admissions Policy. Any vacancy should be filled with the child at the top of the waiting list and must not be on a first-come-first-serve basis.

## 11. Twins and Multiple Births

- 11.1 For applications made in the normal admission round, if the last child to be offered a place is a twin and their sibling cannot be offered initially, the school will ensure both twins are offered a place. In the case of triplets or other multiple births, if the majority of children can be offered a place initially, the school will offer places to the remaining children. For example, if two triplets can be offered a place, the remaining child will also receive an offer of a place.

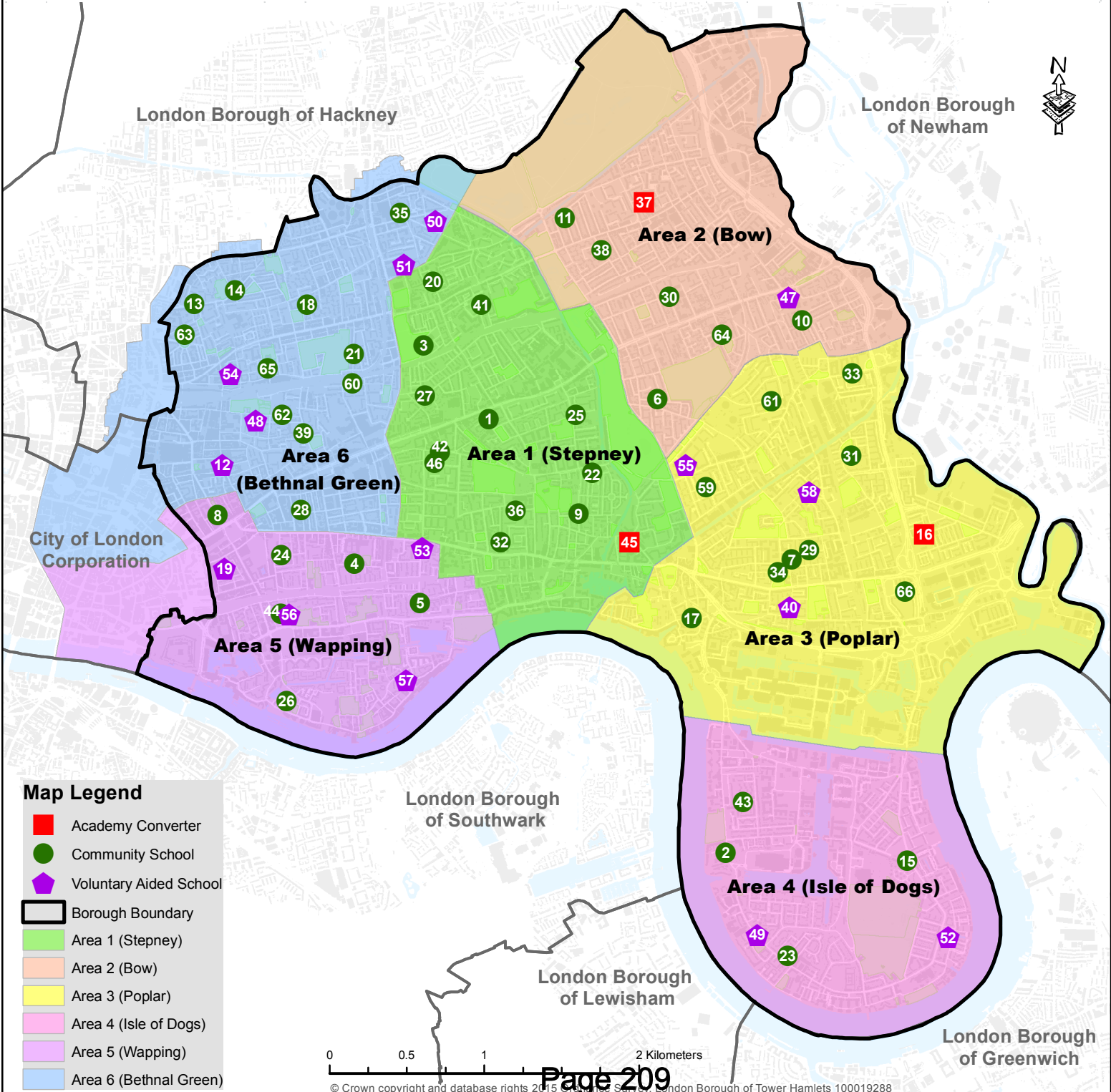
## 12. Parents wishing to make representation about nursery decisions

- 12.1 Parents who are dissatisfied with the outcome of the nursery application should contact the headteacher of the school in the first instance. If they remain dissatisfied then they should contact the Pupil Services Manager.

# Tower Hamlets Nursery Schools Catchments Areas for 2017/18

Date: 28/10/2015

1 Alice Model	16 Culloden	31 Manorfield	46 Smithy	61 The Clara Grant
2 Arnhem Wharf	17 Cyril Jackson	32 Marion Richardson	47 St Agnes RC	62 Thomas Buxton
3 Bangabandhu	18 Elizabeth Selby Infants' School	33 Marner	48 St Anne RC	63 Virginia
4 Bigland Green	19 English Martyrs RC	34 Mayflower	49 St Edmund RC School	64 Wellington
5 Blue Gate Fields Infants' School	20 Globe	35 Mowlem	50 St Elizabeth's RC	65 William Davis
6 Bonner (Mile End)	21 Hague	36 Old Church	51 St John's CofE	66 Woolmore
7 Bygrove	22 Halley	37 Old Ford	52 St Luke's CofE	
8 Canon Barnett	23 Harbinger	38 Olga	53 St Mary's and St Michael's	
9 Cayley	24 Harry Gosling	39 Osmani	54 St Matthias CofE	
10 Childrens House	25 Harry Roberts	40 Our Lady & St Joseph	55 St Paul with St Luke CofE	
11 Chisenhale	26 Hermitage	41 Rachel Keeling	56 St Paul's Whitechapel CofE	
12 Christ Church CofE	27 John Scurr	42 Redlands	57 St Peter's London Docks CofE	
13 Columbia Market	28 Kobi Nazrul	43 Seven Mills	58 St Saviour's CofE	
14 Columbia	29 Lansbury Lawrence	44 Shapla	59 Stebon	
15 Cubitt Town Infants' School	30 Malmesbury	45 Sir William Burrough	60 Stewart Headlam	



**Map Legend**

- Academy Converter (Red square)
- Community School (Green circle)
- Voluntary Aided School (Purple pentagon)
- Borough Boundary (Black line)
- Area 1 (Stepney) (Light Green)
- Area 2 (Bow) (Light Orange)
- Area 3 (Poplar) (Light Yellow)
- Area 4 (Isle of Dogs) (Light Pink)
- Area 5 (Wapping) (Light Purple)
- Area 6 (Bethnal Green) (Light Blue)

0 0.5 1 2 Kilometers

Note: Catchment areas apply to community schools. For own Admissions Authority (VA/Academy/Free Schools) please refer to their admission policy



## Catchment Area 1 (Stepney)

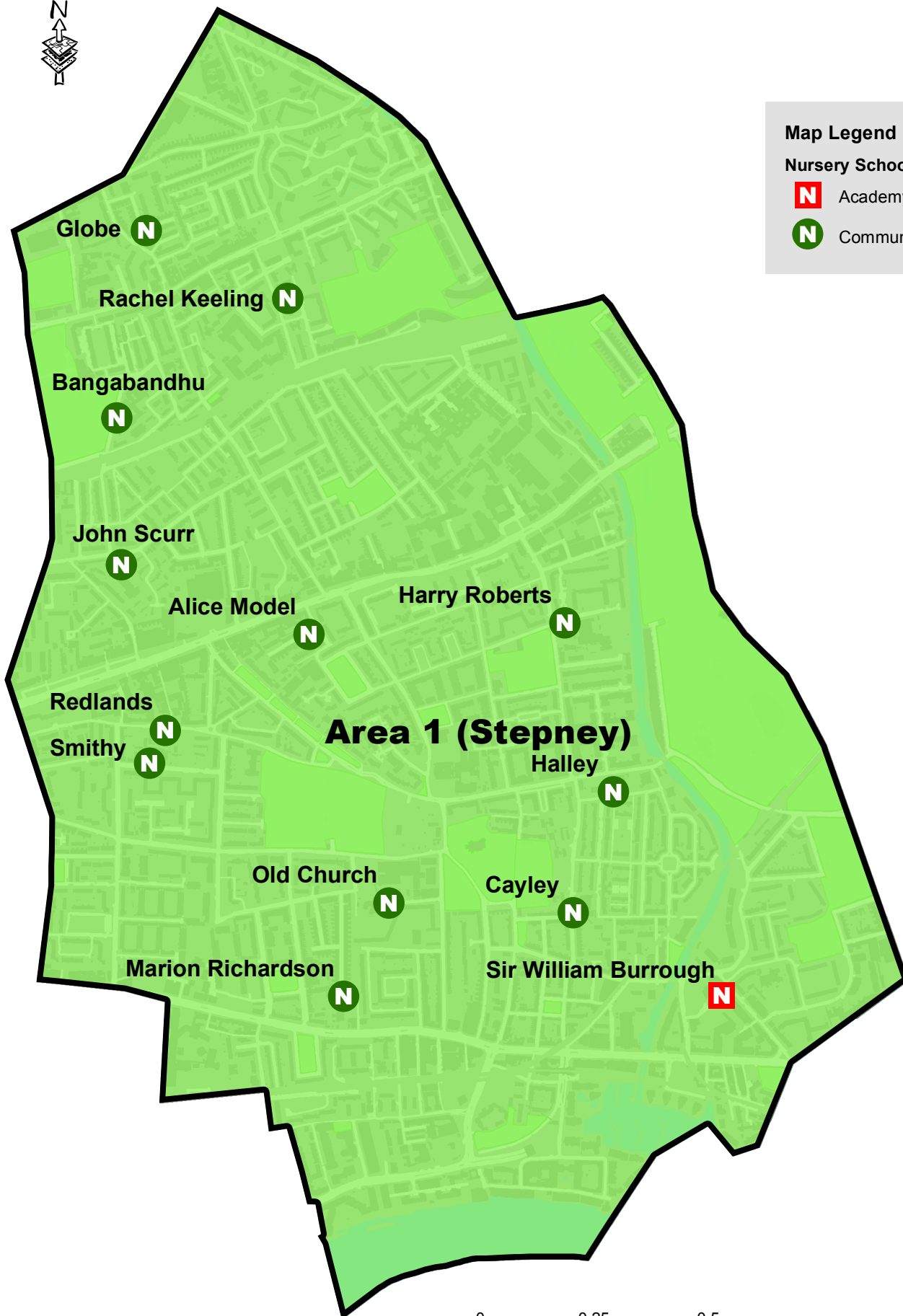
Date: 28/10/2015



### Map Legend

#### Nursery Schools

-  Academy Converter
-  Community School

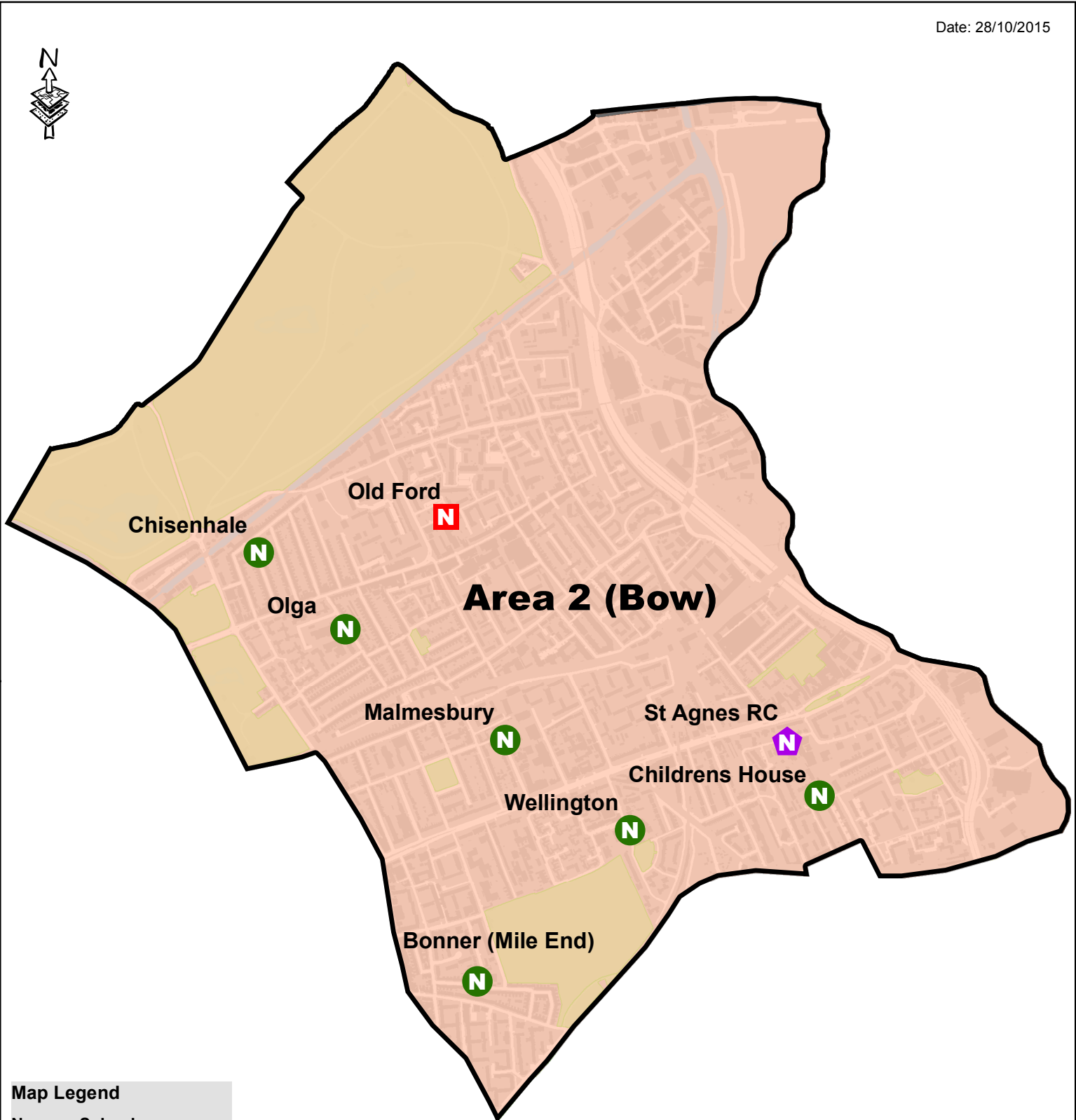


# Tower Hamlets Nursery Schools for 2017/18

## Catchment Area 2 (Bow)




Includes the area previously known as Bow North and part of Bow South

Date: 28/10/2015



### Map Legend

#### Nursery Schools

-  Academy Converter
-  Community School
-  Voluntary Aided School



# Tower Hamlets Nursery Schools for 2017/18

## Catchment Area 3 (Poplar)




Includes the area previously known as Poplar and part of Bow South

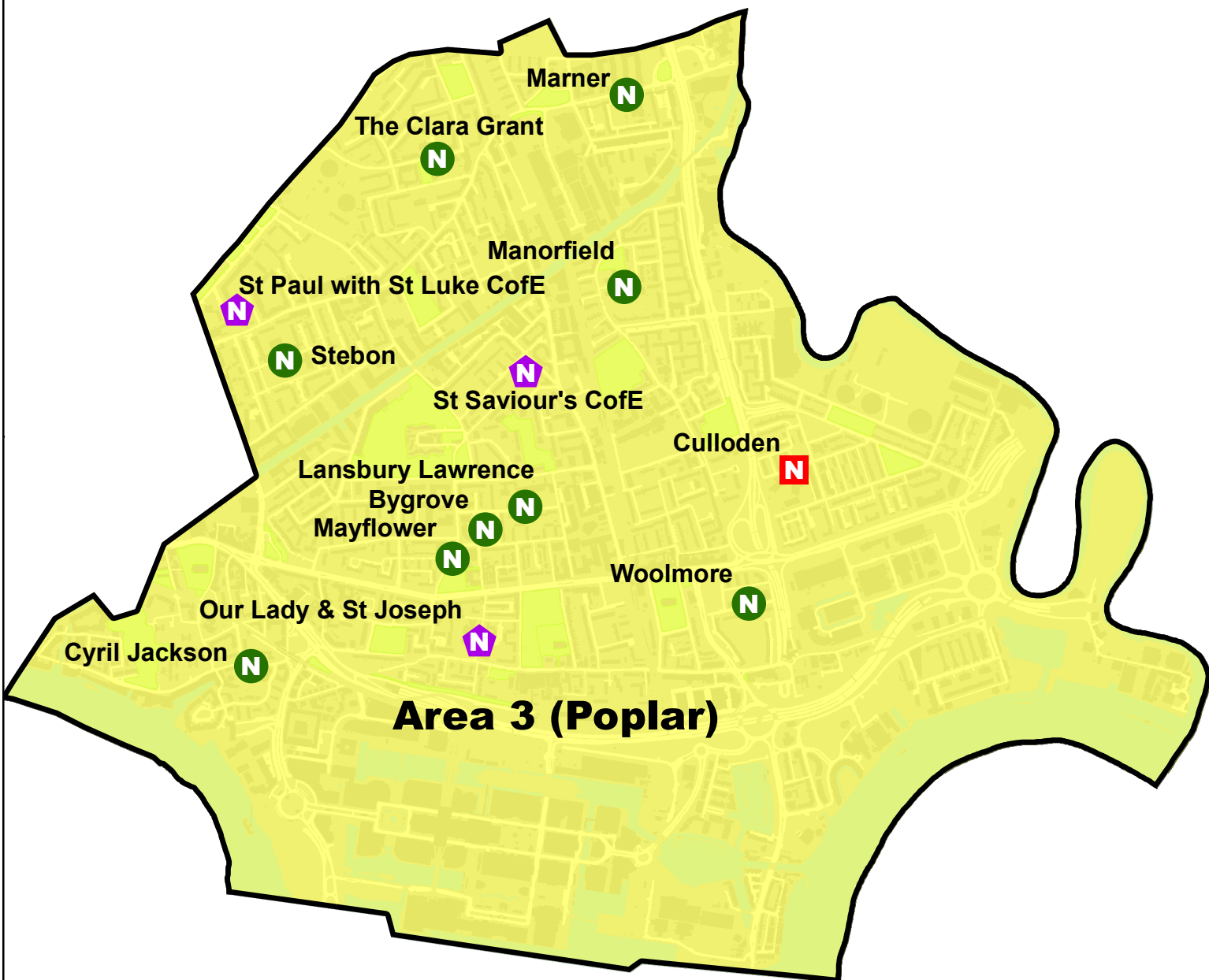
Date: 28/10/2015



### Map Legend

#### Nursery Schools

-  Academy Converter
-  Community School
-  Voluntary Aided School

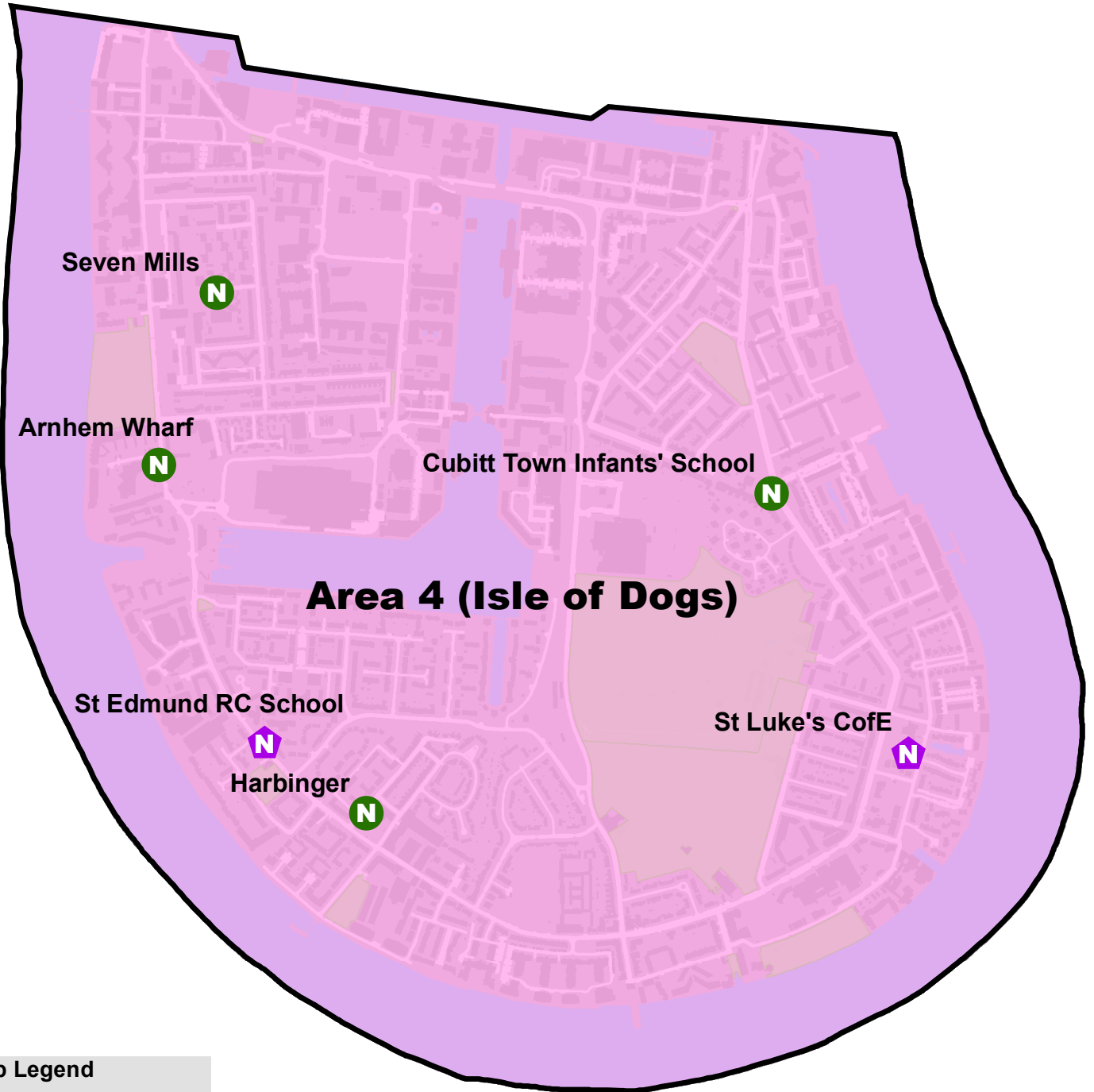


0 0.275 0.55 1.1 Kilometers

## Catchment Area 4 (Isle of Dogs)




Previously known as Area 5

Date: 28/10/2015



### Map Legend

#### Nursery Schools

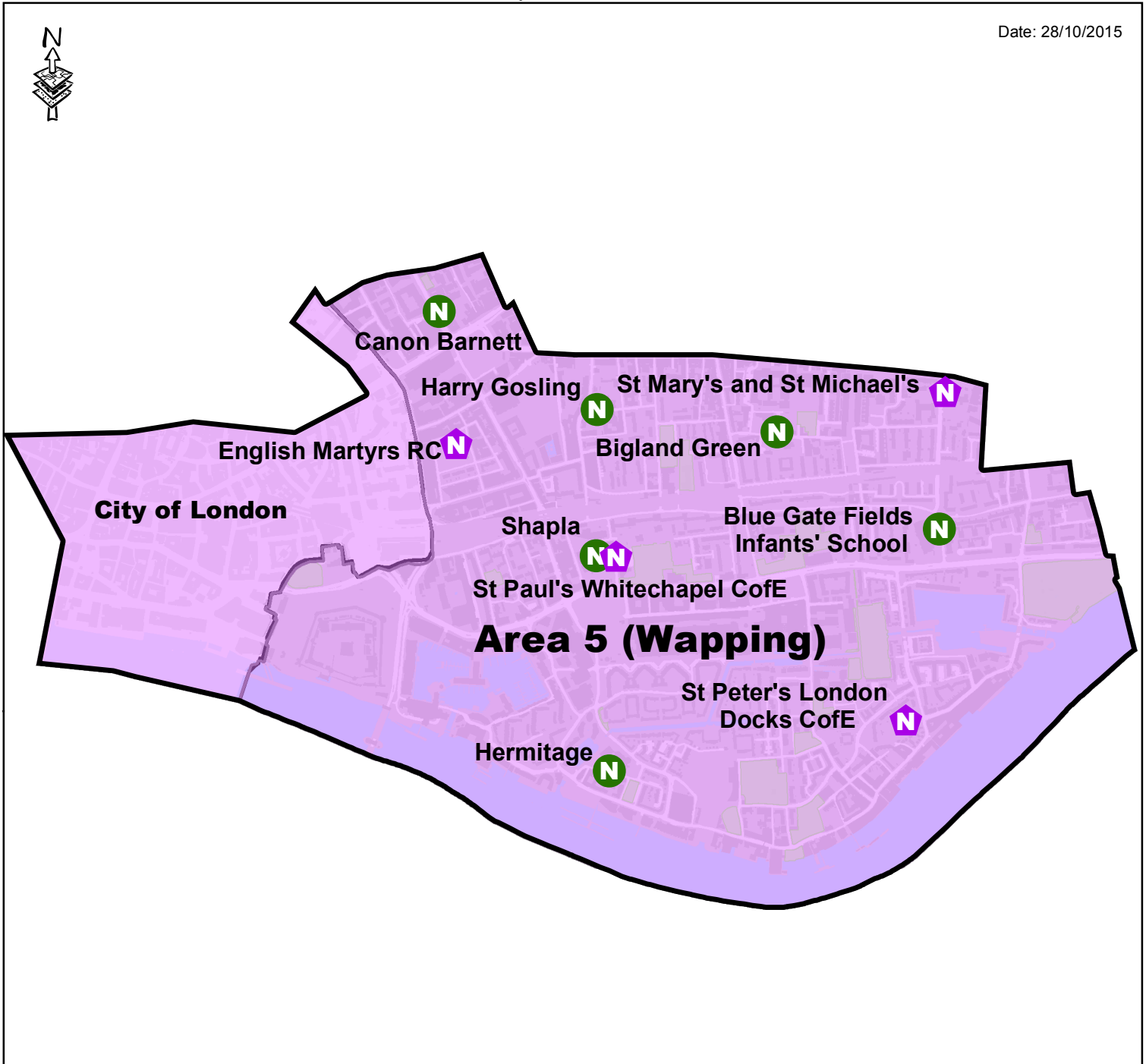
-  Academy Converter
-  Community School
-  Voluntary Aided School

0 0.25 0.5 1 Kilometers

## Catchment Area 5 (Wapping)




Previously Known as Area 6

Date: 28/10/2015



### Map Legend

#### Nursery Schools

-  Academy Converter
-  Community School
-  Voluntary Aided School



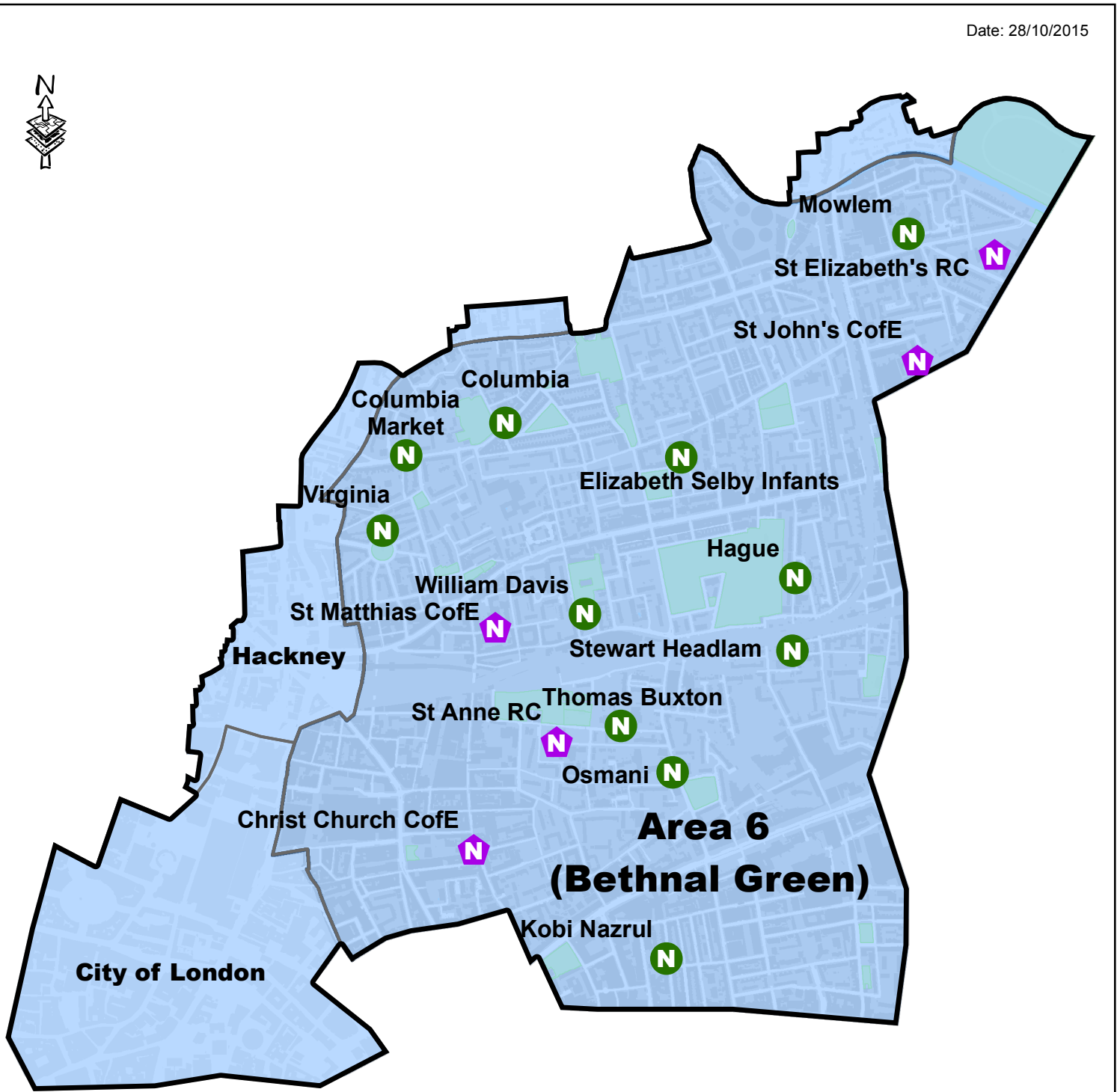


# Tower Hamlets Nursery Schools for 2017/18

## Catchment Area 6 (Bethnal Green)


Previously known as Area 7


Date: 28/10/2015



### Map Legend

#### Nursery Schools

 Community School

 Voluntary Aided School



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# TOWER HAMLETS CHILDREN'S SERVICES

## Proposed Admissions Criteria and Arrangements for Community Primary Schools

2017/18



**Version:** 1.0  
**Date issued:** 1<sup>st</sup> November 2015  
**Prepared by:** Pupil Services  
Children's Services  
Directorate



## 1. Foreword

- 1.1 Tower Hamlets Local Authority seeks to operate an admissions system that provides equal and fair opportunities to all applicants. This includes having due regard to children living in areas where there are limited options in applying for a local school place.
- 1.2 The Local Authority's community school admissions policy has been determined following a public consultation and approval by the Council's Cabinet of elected members. It is reviewed annually by the School Admission Forum, with representation from all key stakeholders including parents, headteachers, school governors, diocesan bodies and community organisations.

## 2. Oversubscription Criteria

- 2.1 If a community school receives more applications than places available, children with a statement of special educational needs or Education, Health and Care Plan, which names the school applied to, will be placed before all other applicants.
- 2.2 The remaining places will be filled in the following priority order:
- 1) Children looked after by the local authority including adopted children who were previously looked after and children who leave care under a special guardianship or residence order;
  - 2) Children for whom it is deemed there is strong medical or social reason to attend the school applied to (**See Note 1**);
  - 3) Children living within the catchment area who have a sibling attending the school (including the school of a separate infants and junior schools) and who will continue to do so on the date of admission (**See Note 2**);
  - 4) Children who live within the catchment area of the school and for whom the school applied for is their nearest community school within the catchment area;
  - 5) Other children from within the catchment area of the school;
  - 6) Children living outside of the catchment area of the school applied to.
- 2.3 In the event of oversubscription within categories 3, 4, 5, and 6 above, priority will be given to children who live closest to the school by the shortest walking distance. A digitised Ordnance Survey map is used to measure the distance from the home address to the school's designated official entrance.
- 2.4 **Note 1:** This can include the parents', carers' or other family members' medical conditions and the family's social needs. Parents must complete the relevant section on the application form and attach medical and/or social reports from a suitable professional (e.g. a doctor or social worker) to support the application.
- Note 2:** Includes the sibling of a child who does not live within the school's catchment area, but who was admitted before the start of the 2015/16 school year. For this purpose "sibling" means a whole, half or step-brother or step-sister resident at the same address.

### 3. Catchment Area

- 3.1 The school catchment area is the defined area in which a school is located. It is generally bounded by major roads and/or railway/canal. The catchment area for each Tower Hamlets Community school is set by the Local Authority and is designed to ensure that each address in the borough falls into the catchment area of a local school. Details of the community schools within the catchment area for a particular address can be viewed on the Local Authority's website: <http://www.towerhamlets.gov.uk/equalchance>.

### 4. Age of Admission

- 4.1 Children born on and between 1 September 2012 and 31 August 2013 would normally start primary school in Reception in the school year beginning in September 2017. All Tower Hamlets infant and primary schools provide full-time education for children offered a place in the Reception Year from the September following their fourth birthday.
- 4.2 Parents can request that the date their child is admitted to school is deferred until later in the school year or until the child reaches compulsory school age during the school year. A child's attendance at school does not become compulsory until the start of the term following their fifth birthday. Where entry is deferred, the school will hold the place for that child and not offer it to another child. The parent would not however be able to defer entry beyond the beginning of the term after the child's fifth birthday, nor beyond the start of the summer term in the academic year for which the original application was accepted.
- 4.3 Where parents choose to defer entry, a school may reasonably expect that the child would start at the beginning of a new school term/half term. Where a parent of a 'summer-born' child (15 April - 31 August) wishes their child to start school in the autumn term following their fifth birthday, they will need to re-apply for a place at the correct time.
- 4.4 It is the view of the Local Authority that children should start primary school with their normal age group. However, a parent may seek admission for their child outside the normal group; for example, if the child is gifted and talented or has been born prematurely. If a parent wishes to request for their child to be admitted outside of the normal age group, they should include a letter with their reception application and also provide a report from an appropriate education or health professional.

### 5. Nursery Provision

- 5.1 Some schools have a nursery class or deliver pre-school nursery education. The admission arrangements set out in this document do not apply to applications for the school's nursery. Parents of children who are admitted to a nursery provision at a school must apply in the normal way for a place at the school, if they want their child to transfer to the reception class. Attendance at the nursery or co-located children's centre will not guarantee admission to the school.

### 6. Applying for a Place

- 6.1 How to apply for a primary school place is set out in the Local Authority's school admissions booklet, 'Starting School in Tower Hamlets'. Applications are then co-ordinated for all the schools in the Tower Hamlets area in accordance with the Authority's published scheme. The scheme can be viewed on the following webpage: [http://www.towerhamlets.gov.uk/lgs/1-50/17\\_schools/school\\_admissions.aspx](http://www.towerhamlets.gov.uk/lgs/1-50/17_schools/school_admissions.aspx)
- 6.2 The closing date for applications is **15 January 2017** and the date on which families are sent notification of the outcome is **18 April 2017**

## 7. Late Applications

- 7.1 Applications received after the 15 January 2017 closing date will be treated as late applications unless there is evidence to show that the application or amendment could not reasonably have been made on time. A new preference or change in the order of preferences will not be accepted after the closing date unless the circumstances are deemed to be exceptional. Late applications will be given a lower priority and will be dealt with after all on time applications in the first round of offers on 18 April 2017. Where a school is oversubscribed late applications will be refused and placed on the waiting list in accordance with the admission criteria.
- 7.2 Where the Local Authority has determined there are exceptional circumstances for the late submission of an application it will be treated as 'on time' and, where possible, considered alongside existing applications.

## 8. Twins and Multiple Births

- 8.1 For applications made in the normal admission round, if the last child to be offered a place is a twin and their sibling cannot be offered initially, the Local Authority will ensure both twins are offered a place. In the case of triplets or other multiple births, if the majority of children can be offered a place initially, the Local Authority will offer places to the remaining children. For example, if two triplets can be offered a place, the remaining child will also receive an offer of a place.

## 9. Waiting List

- 9.1 The Local Authority's Pupil Services Team will hold waiting lists for all oversubscribed community schools until the end of the autumn term and continue to allocate places from these lists if spaces become available. Applicants will be ranked on these waiting lists in priority order, according to the school's admission criteria. The Local Authority will not maintain waiting lists beyond the end of the first term, but parents will have the opportunity to register their continued interest in a place.

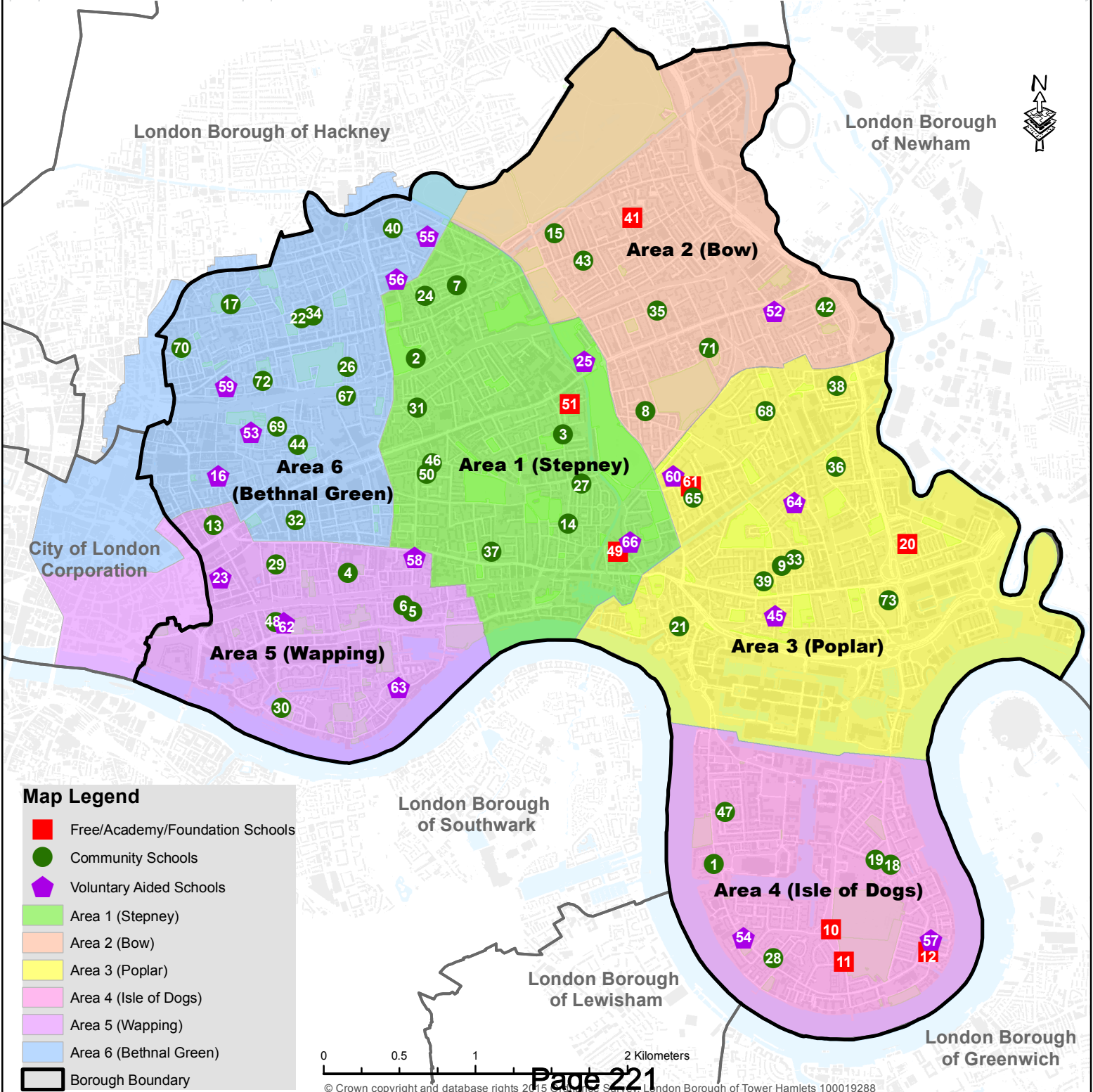
## 10. Infant to Junior Applications

- 10.1 Parents of children in Year 2 of an infant school have to make an application to transfer to the partner junior school. A child is guaranteed a place at the partner junior school provided an application for that place is made by the closing date and the child is still in attendance at the school at the time applications are determined. For parents who wish their child only to transfer to the partner junior school the application simply involves completing and returning a form provided by the Local Authority. Parents who wish to apply for a Year 3 place at schools other than the partner junior school will need to complete the Local Authority's In-Year school admission application form.

# Tower Hamlets Primary Schools Catchments Areas for 2017/18

Date: 28/10/2015

- |                                    |                                    |                                  |                               |                                 |
|------------------------------------|------------------------------------|----------------------------------|-------------------------------|---------------------------------|
| 1 Arnhem Wharf                     | 16 Christ Church CofE              | 31 John Scurr                    | 46 Redlands                   | 61 St Paul's Way Foundation     |
| 2 Bangabandhu                      | 17 Columbia                        | 32 Kobi Nazrul                   | 47 Seven Mills                | 62 St Paul's Whitechapel CofE   |
| 3 Ben Jonson                       | 18 Cubitt Town Infants' School     | 33 Lansbury Lawrence             | 48 Shapla                     | 63 St Peter's London Docks CofE |
| 4 Bigland Green                    | 19 Cubitt Town Junior School       | 34 Lawdale Junior School         | 49 Sir William Burrough       | 64 St Saviour's CofE            |
| 5 Blue Gate Fields Infants' School | 20 Culloden                        | 35 Malmesbury                    | 50 Smithy                     | 65 Stebon                       |
| 6 Blue Gate Fields Junior School   | 21 Cyril Jackson                   | 36 Manorfield                    | 51 Solebay                    | 66 Stepney Greencoat CofE       |
| 7 Bonner (Bethnal Green)           | 22 Elizabeth Selby Infants' School | 37 Marion Richardson             | 52 St Agnes RC                | 67 Stewart Headlam              |
| 8 Bonner (Mile End)                | 23 English Martyrs RC              | 38 Marner                        | 53 St Anne RC                 | 68 The Clara Grant              |
| 9 Bygrove                          | 24 Globe                           | 39 Mayflower                     | 54 St Edmund RC School        | 69 Thomas Buxton                |
| 10 Canary Wharf College 3          | 25 Guardian Angels RC              | 40 Mowlem                        | 55 St Elizabeth's RC          | 70 Virginia                     |
| 11 Canary Wharf College East Ferry | 26 Hague                           | 41 Old Ford - a Paradigm Academy | 56 St John's CofE             | 71 Wellington                   |
| 12 Canary Wharf College Glenworth  | 27 Halley                          | 42 Old Palace                    | 57 St Luke's CofE             | 72 William Davis                |
| 13 Canon Barnett                   | 28 Harbinger                       | 43 Olga                          | 58 St Mary's and St Michael's | 73 Woolmore                     |
| 14 Cayley                          | 29 Harry Gosling                   | 44 Osmani                        | 59 St Matthias CofE           |                                 |
| 15 Chisenhale                      | 30 Hermitage                       | 45 Our Lady & St Joseph          | 60 St Paul with St Luke CofE  |                                 |



**Map Legend**

- Free/Academy/Foundation Schools
- Community Schools
- ⬠ Voluntary Aided Schools
- Area 1 (Stepney)
- Area 2 (Bow)
- Area 3 (Poplar)
- Area 4 (Isle of Dogs)
- Area 5 (Wapping)
- Area 6 (Bethnal Green)
- Borough Boundary

Note: Catchment areas apply to community schools. For own Admissions Authority (VA/Academy/Free Schools) please refer to their admission policy

## Catchment Area 1 (Stepney)

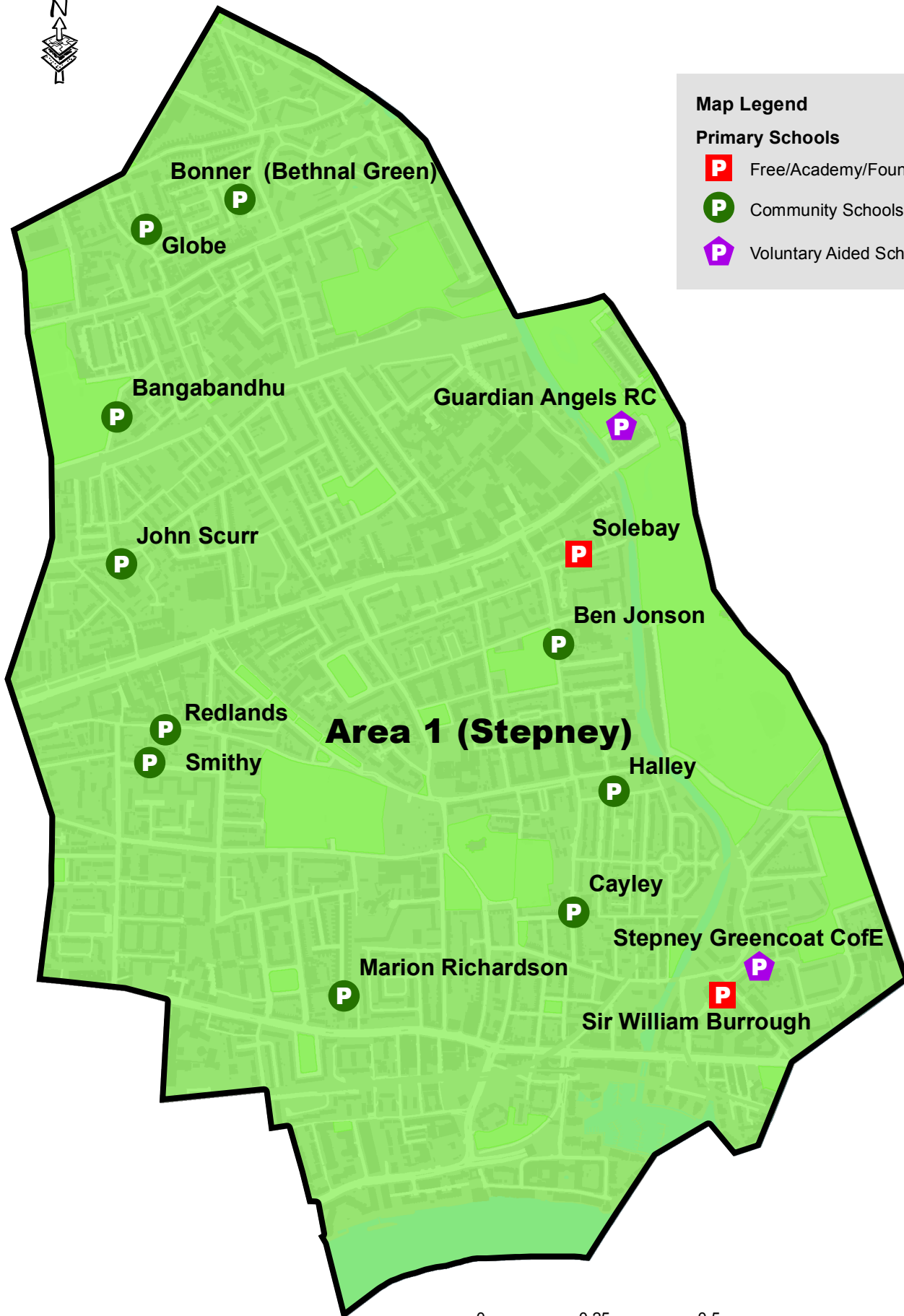
Date: 28/10/2015



### Map Legend

#### Primary Schools

- P Free/Academy/Foundation Schools
- P Community Schools
- P Voluntary Aided Schools

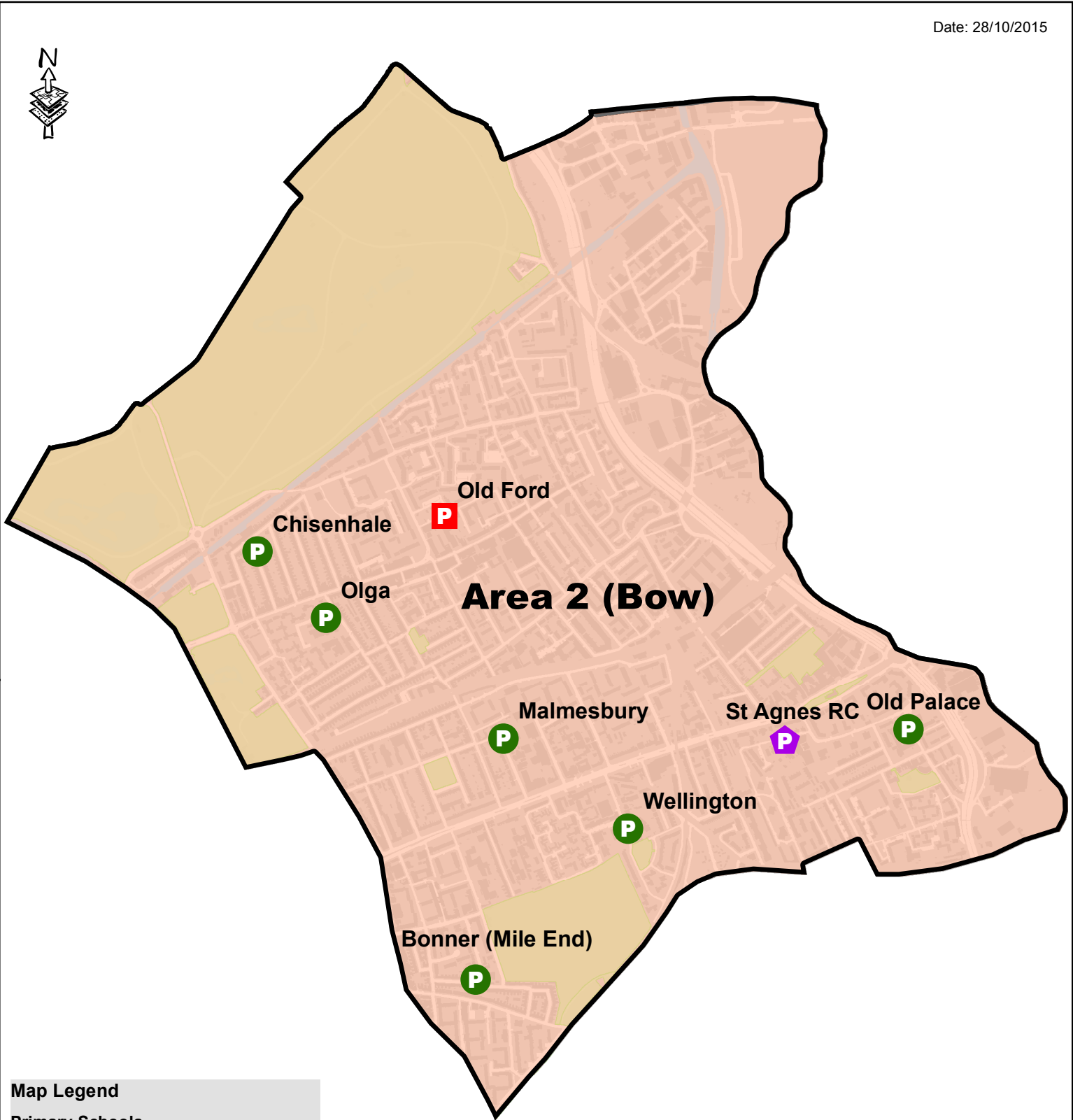




## Catchment Area 2 (Bow)




Includes the area previously known as Bow North and part of Bow South

Date: 28/10/2015



### Map Legend

#### Primary Schools

-  Free/Academy/Foundation Schools
-  Community Schools
-  Voluntary Aided Schools



## Catchment Area 3 (Poplar)




Includes the area previously known as Poplar and part of Bow South

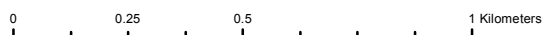
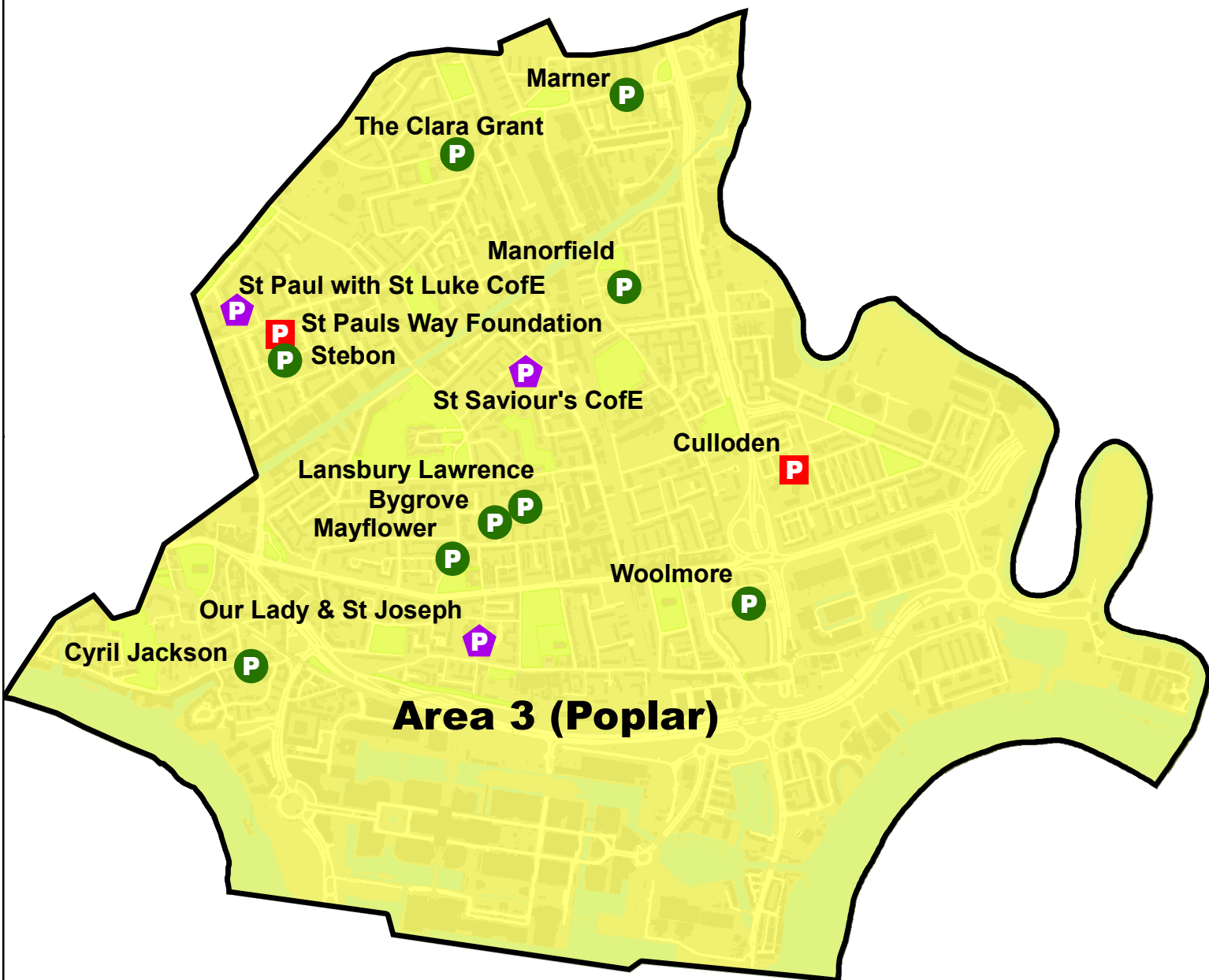
Date: 28/10/2015



### Map Legend

#### Primary Schools

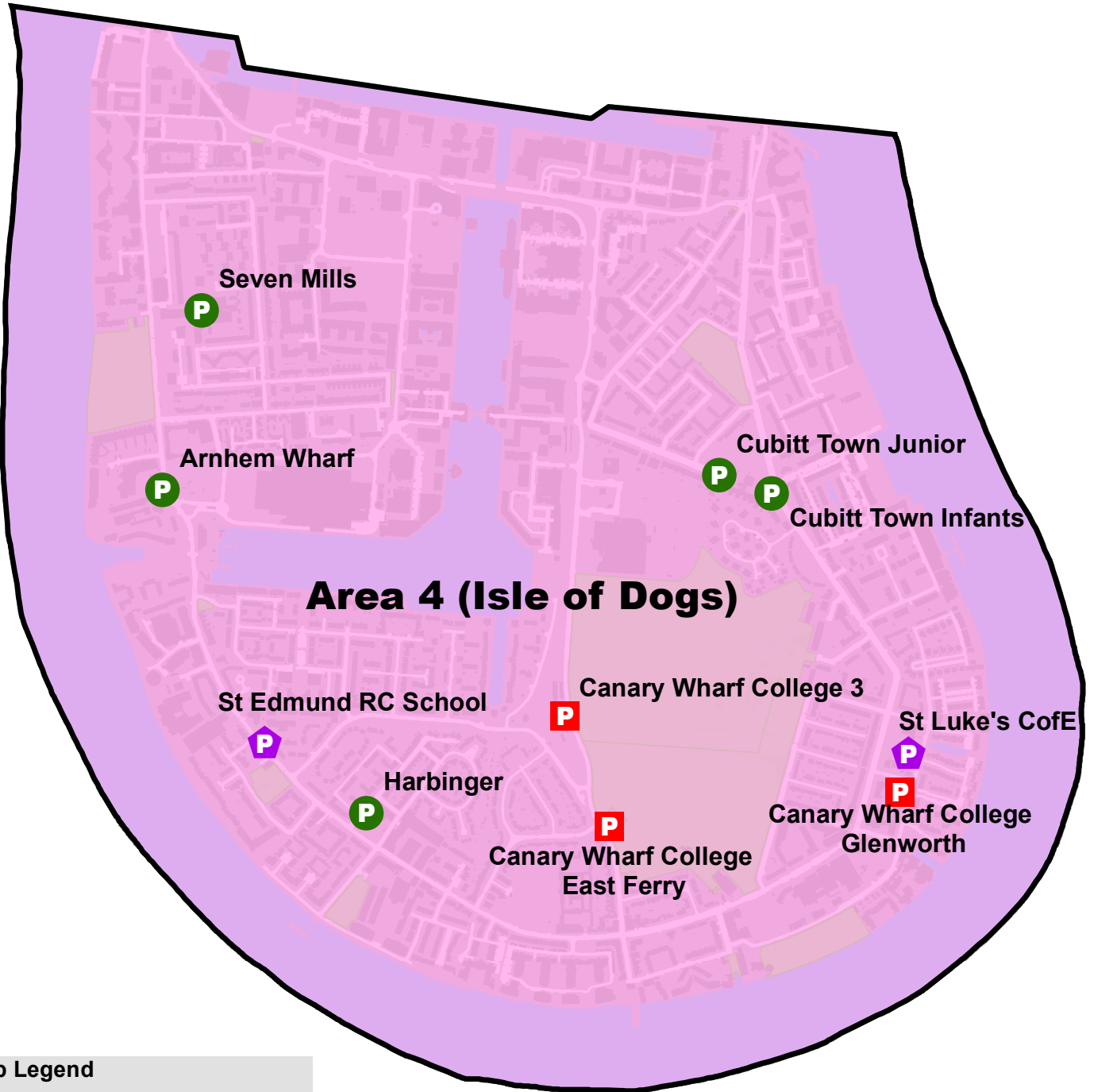
-  Free/Academy/Foundation Schools
-  Community Schools
-  Voluntary Aided Schools



## Catchment Area 4 (Isle of Dogs)




Previously known as Area 5

Date: 28/10/2015



### Map Legend

#### Primary Schools

-  Free/Academy/Foundation Schools
-  Community Schools
-  Voluntary Aided Schools

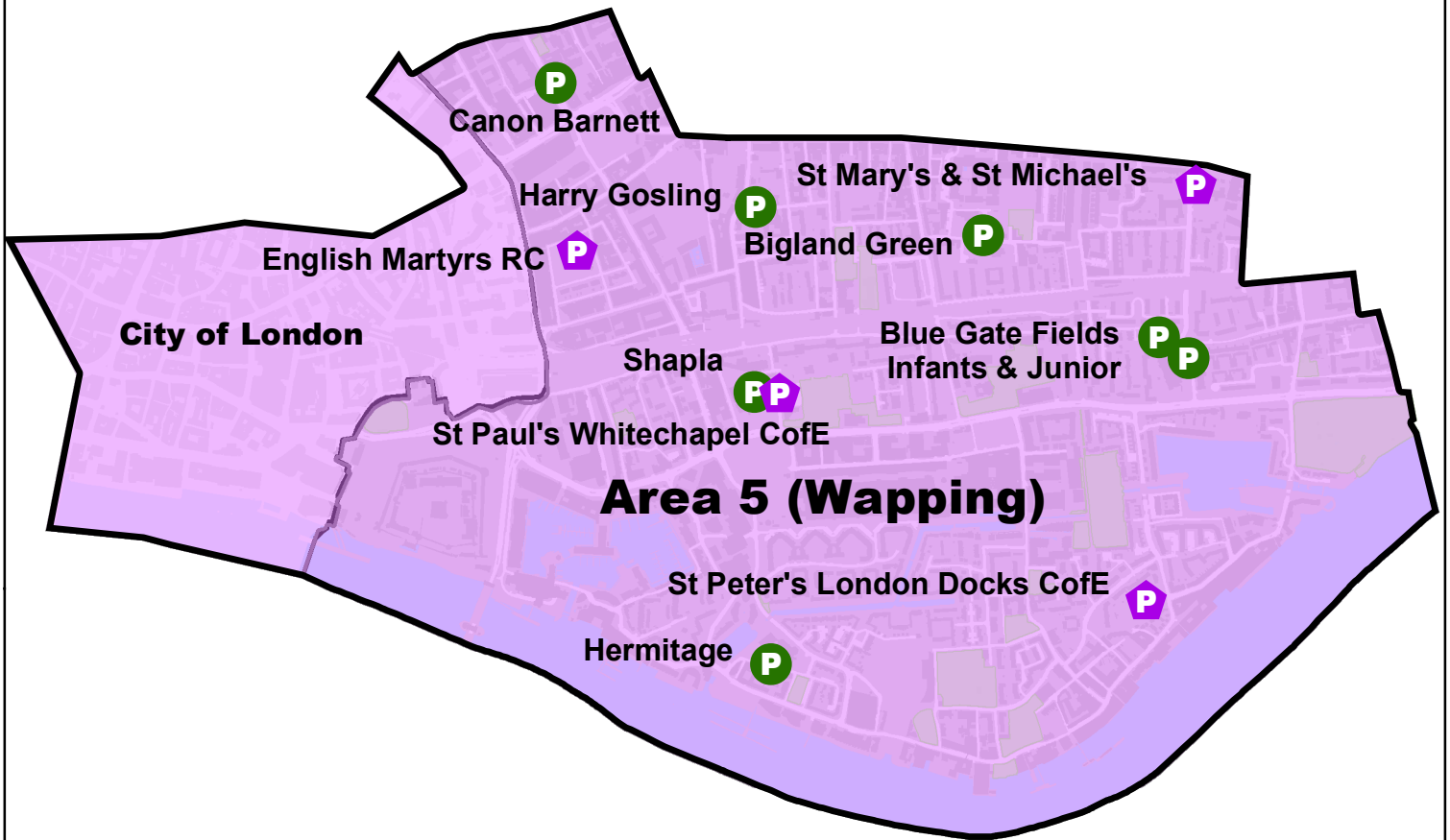


# Tower Hamlets Primary Schools for 2017/18

## Catchment Area 5 (Wapping)




Previously Known as Area 6

Date: 28/10/2015



### Map Legend

#### Primary Schools

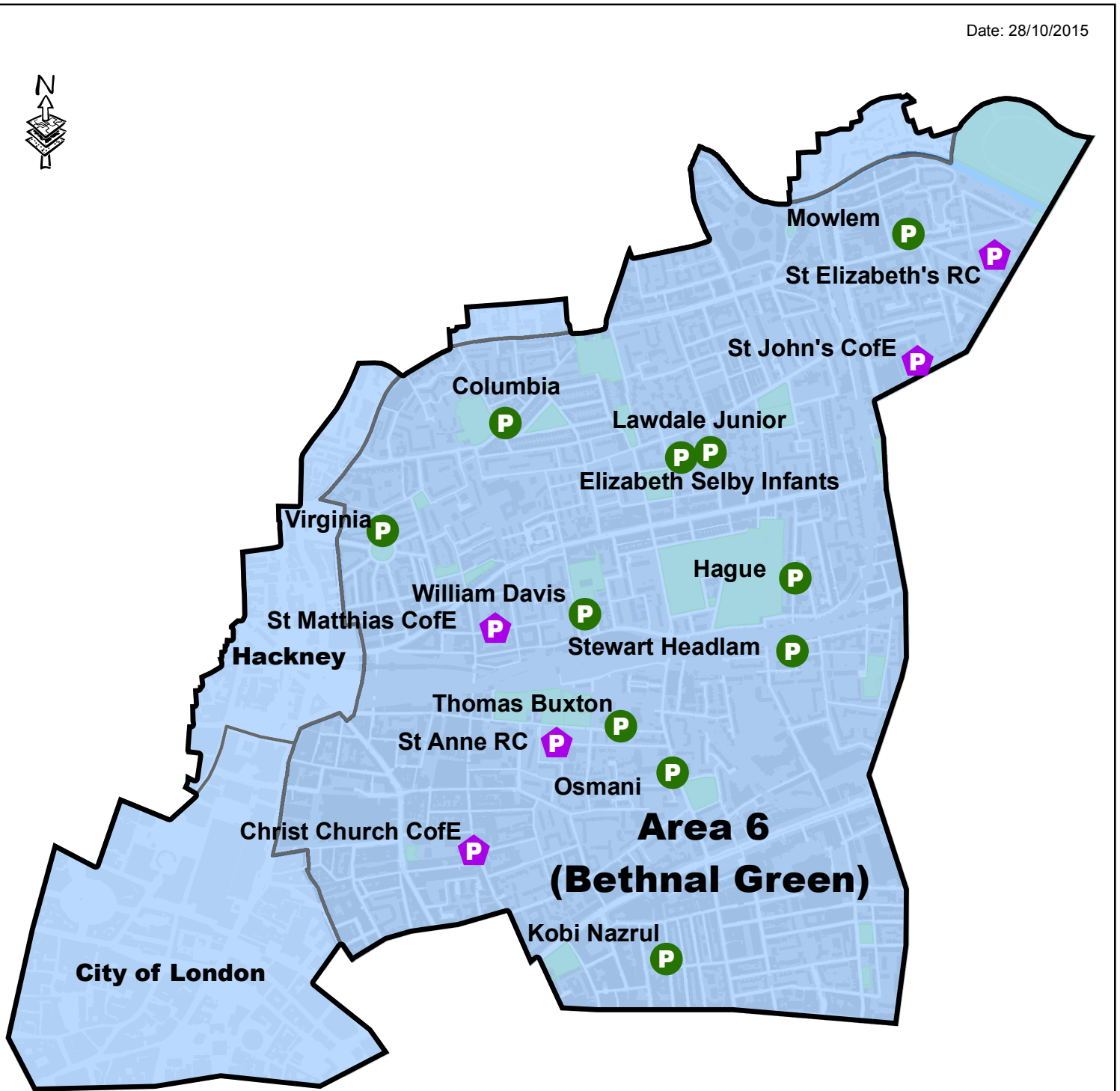
-  Free/Academy/Foundation Schools
-  Community Schools
-  Voluntary Aided Schools



## Catchment Area 6 (Bethnal Green)




Previously known as Area 7

Date: 28/10/2015



### Map Legend

#### Primary Schools

-  Free/Academy/Foundation Schools
-  Community Schools
-  Voluntary Aided Schools



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# TOWER HAMLETS CHILDREN'S SERVICES

## Admissions Arrangements for Community Secondary Schools (Central Foundation Girls School, George Greens School and Bethnal Green Academy)

2017/18



**Version:** 1.0  
**Date issued:** 1<sup>st</sup> November 2015  
**Prepared by:** Pupil Services  
Children's Services  
Directorate



## 1. Foreword

- 1.1 Tower Hamlets Local Authority seeks to operate an admissions system that provides equal and fair opportunities to all applicants. This includes having due regard to children living in areas where there are limited options in applying for a local school place.
- 1.2 The Local Authority's community school admissions policy has been determined following an extensive public consultation and approval by the Council's Cabinet of elected members. It is reviewed annually by the School Admission Forum, with representation from all key stakeholders including parents, headteachers, school governors, diocesan bodies and community organisations.

## 2. Oversubscription Criteria

- 2.1 If a community school receives more applications than places available, children with a statement of special educational needs or Education, Health and Care Plan, which names the school applied to, will be placed before all other applicants. The place will be provided in the appropriate band. Sometimes there are particular reasons why the Local Authority is unable to do so. (See note 1).
- 2.1 A quarter of the total places available at these schools are then allocated to each of the four bands. If any of these are oversubscribed in any band, the admission criteria below will be used (in descending order of priority) to allocate places:
- 1) Children looked after by the local authority, previously looked after children who have left care under a special arrangements (residence) or special guardianship order, or those adopted from local authority care (See note 2).
  - 2) Pupils who have a strong medical or social reason to attend the school applied to. This can include the parents', carers' or other family members' medical conditions and the family's social needs. Parents must complete the relevant section on the application form and attach medical and/or social reports from a suitable professional (e.g. a doctor or social worker) to support the application. (See note 3).
  - 3) Pupils living nearest the school who are the first born of their sex in the case of a single sex school, or the eldest child in the case of a mixed school. The number of children admitted under this category will reflect 25% of the intake of the school in each band.
  - 4) Pupils who have a brother or sister at the school at the time of admission. (See note 4).
  - 5) Pupils who live nearest to the school by the shortest walking route. (See note 5).
- 2.2 In categories 3, 4 and 5 above, a higher priority will be given to pupils who live in the priority geographical areas of south Wapping or west Bethnal Green applying to one of the designated schools. (See 'Priority Areas' below).
- 2.3 **Note 1:** Parents of children with a statement of special educational need or education, health and care plan should note that Tower Hamlets LA seeks to ensure that pupils with statements do not, at secondary transfer time, become unduly concentrated in a few schools. Experience indicates that this can compromise the efficient education of children and the efficient use of resources. This means that if any particular school receives a large number of applications for pupils with statements, some of these may be refused. All applications for pupils with statements or education, health and care plans will be considered by the Special Educational Needs Panel.

**Note 2:** Confirmation of a child's looked after status will be required.



**Note 3:** Applications under this category are considered by the Primary to Secondary Transfer Committee, comprising a Headteacher, a senior member of the Attendance and Welfare Service and a medical professional. The Committee will decide whether the application should be given priority under this category.

**Note 4:** Sibling refers to brother or sister, half brother or sister, adopted brother or sister, step brother or sister, or the child of the parent/carer's partner, and in every case, the child should be living in the same family unit at the same address. The address used should be the one that the child usually lives at and attends school from.

**Note 5:** Home to school distances will be measured by the shortest walking route from the home address to the nearest available pupil entrance in constant use to the school, using a computerised digitised map.

### 3. Priority areas

- 3.1 The south Wapping priority area is the area south of Cable Street and Royal Mint Street, west of Butcher Row, north of the Thames and east of Mansell Street and Tower Bridge Approach. Children living in this area will have priority for admission to the designated schools, which are Mulberry and Stepney Green.
- 3.2 The west Bethnal Green priority area is the area south of Quaker Street, west of Brick Lane, north of Whitechapel High Street and east of Middlesex Street. Children living in this area will have priority for admission to the designated school, which is Swanlea.

### 4. Exceptional Medical or Social Reasons

- 4.1 Where there is a very strong medical or social reason for attending a particular school priority may be given for admission. Parents must complete the relevant section on the transfer form and attach medical and/or social reports signed by a doctor or social worker to the form. These reports must be received by the closing date on 31<sup>st</sup> October 2017. The application will be considered by the Primary / Secondary Transfer Committee.

### 5. Confirmation of Address

- 5.1 Parents may be required to provide acceptable independent proof of their child's address. They must make sure that the application form they complete is accurate and to contact Pupil Services or tell their child's headteacher if there are relevant changes after it is submitted. Places may be withdrawn if false information is entered on the application form. Parents who do not provide evidence of their child's address as requested, or provide conflicting or inconclusive information, may have the place withdrawn, even if it has already been accepted. When parents live separately, the address used should be the one that their child usually lives at and attends school from. If a child lives equally with both parents at different addresses, it is the parents' responsibility to make this clear on the application form. Parents may be asked to provide acceptable proof that this is the case.

### 6. Siblings in the same year group transferring

Where two or more siblings are in the same year group (e.g. twins), and it is the parent's wish that the siblings should attend the same school, if one sibling can be offered a place at a school, the other will automatically be offered so as not to separate them.

### 7. Applying for a Place

- 7.1 How to apply for a secondary school place is set out in the Local Authority's school admissions booklet, 'Ready for Secondary School in Tower Hamlets'. Applications are then co-ordinated for all the schools in the Tower Hamlets area in accordance with the Authority's published scheme. The scheme can be viewed on the following webpage: [http://www.towerhamlets.gov.uk/lgs/1-50/17\\_schools/school\\_admissions.aspx](http://www.towerhamlets.gov.uk/lgs/1-50/17_schools/school_admissions.aspx)

## Admissions Criteria for LBTH Community Secondary Schools in 2017/18

- 7.2 The closing date for applications is **31<sup>st</sup> October 2016** and the date on which families are sent notification of the outcome is **1<sup>st</sup> March 2017**.

### 8. Late applications

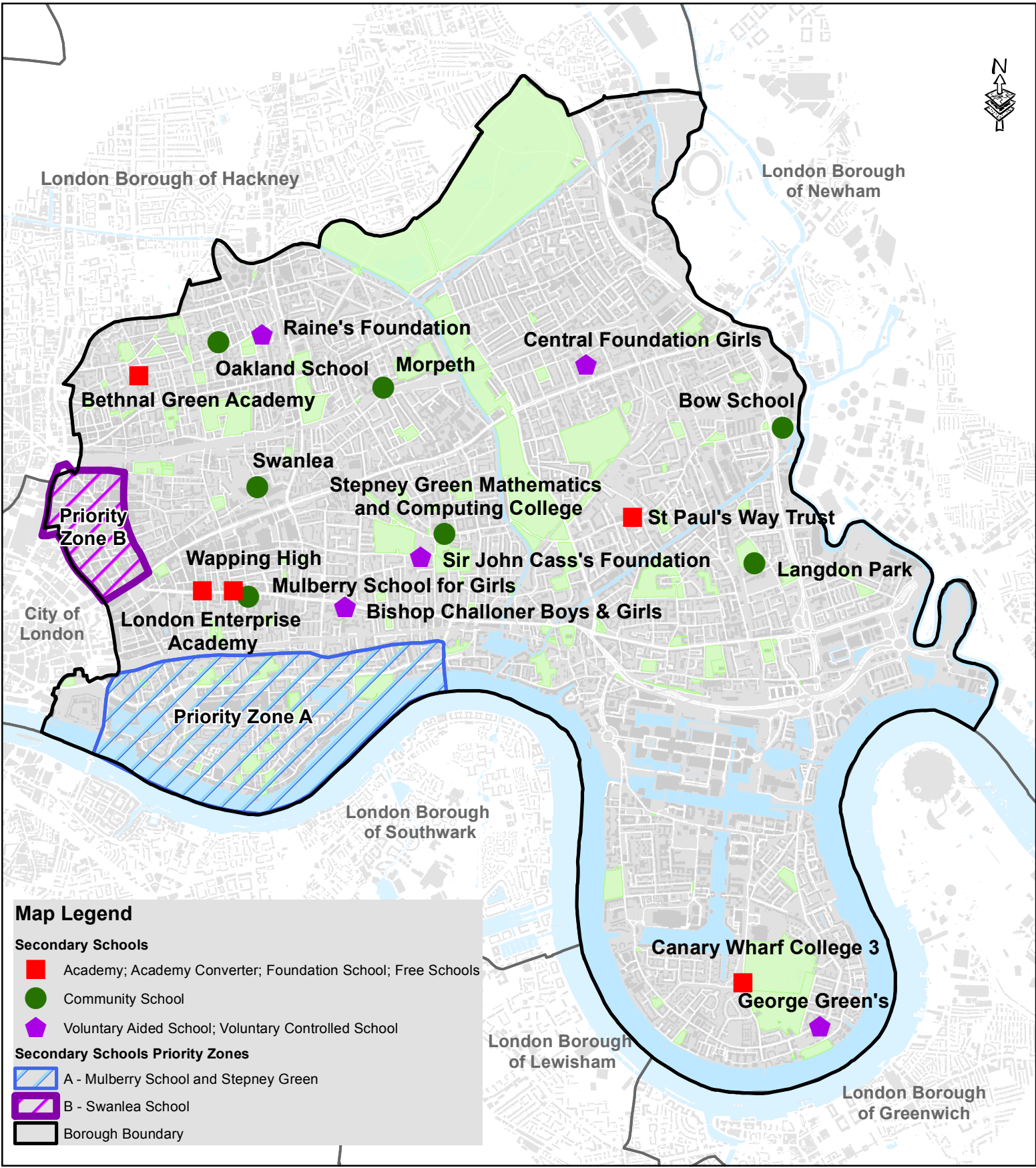
Applications received after the 31<sup>st</sup> October 2016 closing date will be treated as late applications unless there is evidence to show that the application or amendment could not reasonably have been made on time. A new preference or change in the order of preferences will not be accepted after the closing date unless the circumstances are deemed to be exceptional. Late applications will be given a lower priority and will be dealt with after all on time applications in the first round of offers on 1<sup>st</sup> March 2017. Where a school is oversubscribed late applications will be refused and placed on the waiting list in accordance with the admission criteria

### 9. Changing Preferences

Parents and carers may not change their preferences unless there is exceptional and genuine reasons for doing so, for example, change of address. Requests to change preferences must be made in writing giving the full reasons.

# Tower Hamlets Secondary Schools and Priority Zone Areas for 2017/18

Date: 08/01/2016



### Map Legend

#### Secondary Schools

- Academy; Academy Converter; Foundation School; Free Schools
- Community School
- ⬠ Voluntary Aided School; Voluntary Controlled School

#### Secondary Schools Priority Zones

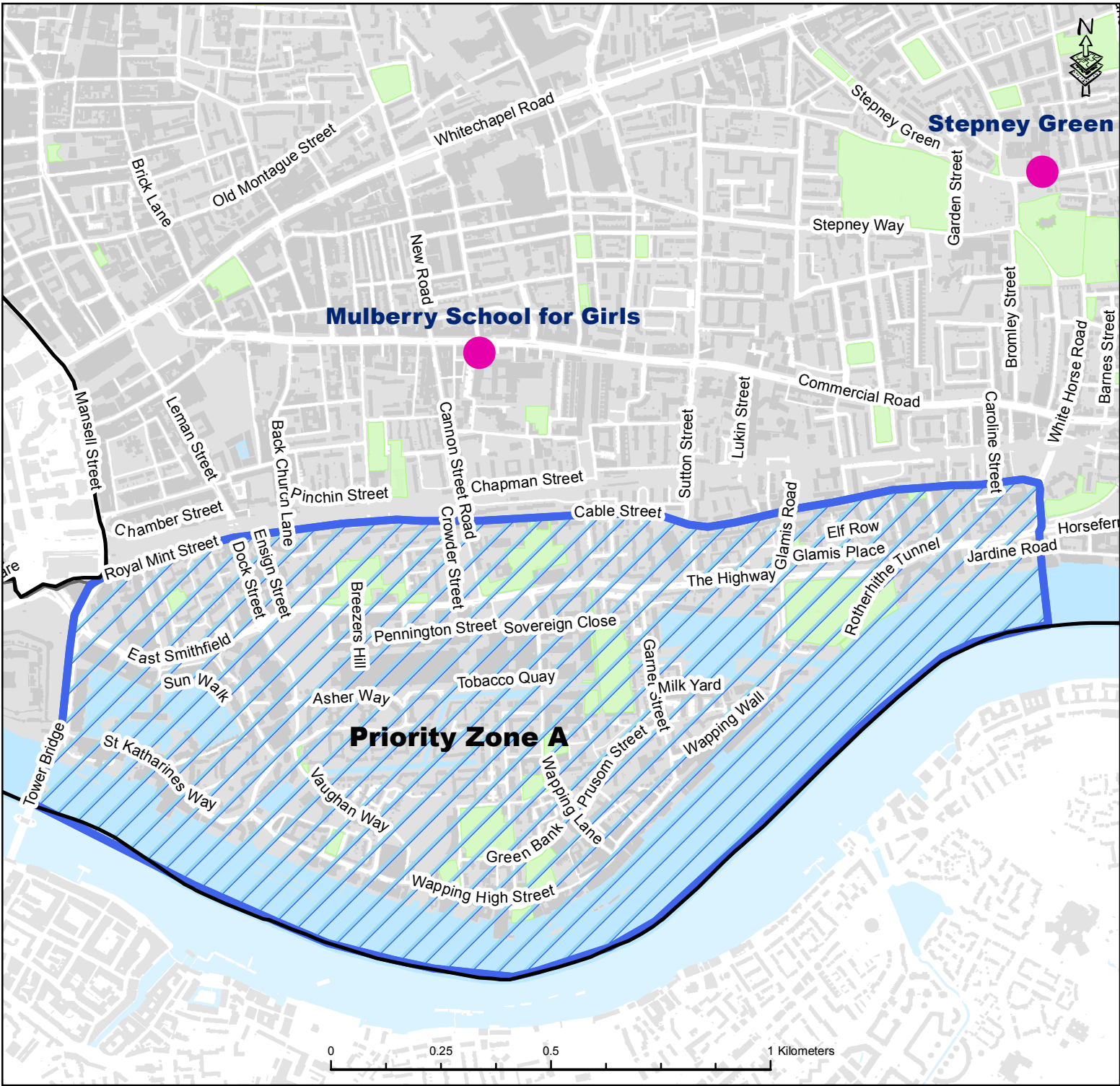
- A - Mulberry School and Stepney Green
- B - Swanlea School
- Borough Boundary

0 0.5 1 2 Kilometers

# Secondary Schools 2017/18 - Priority Zone A (South Wapping) – Mulberry Girls School and Stepney Green Maths and Computing College



Date: 08/01/2016

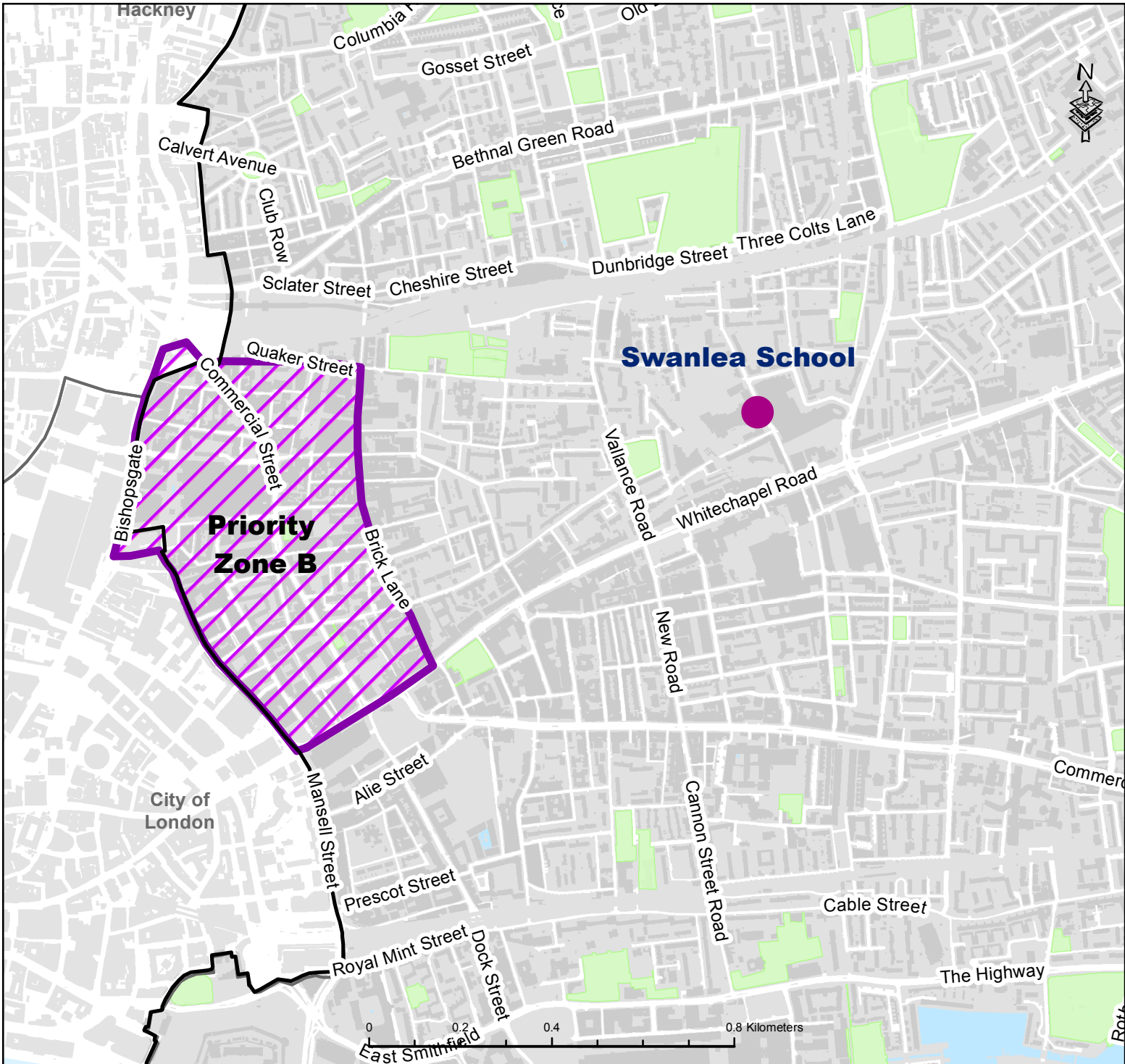


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Note: Catchment areas apply to community schools. For own Admissions Authority (VA/Academy/Free Schools) please refer to their admission policy

# Secondary Schools 2017/18 - Priority Zone B (West Bethnal Green) – Swanlea School

Date: 08/01/2016



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Note: Catchment areas apply to community schools. For own Admissions Authority (VA/Academy/Free Schools) please refer to their admission policy

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**TOWER HAMLETS CHILDREN'S SERVICES**  
**PROPOSED SCHEMES for CO-ORDINATION OF ADMISSIONS TO**  
**RECEPTION and YEAR 7 IN 2017/18**



**Version:** 1.0  
**Date issued:** 1<sup>st</sup> November 2015  
**Prepared by:** Pupil Services  
Children's Services  
Directorate



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- Page 5: Proposed scheme for the co-ordination of admissions to Reception in September 2017
- Page 10: Proposed scheme for the co-ordination of admissions to Year 7 in September 2017
- Page 15: Content of Common Application Form for Reception and Year 7 Schemes
- Page 16: Template Outcome Letter – Reception and Year 7 Schemes
- Page 18: Timetable for Reception Scheme (Schedule 3A)
- Page 19: Timetable for Year 7 Scheme (Schedule 3B)
- Page 20: Tower Hamlets Supplementary Information Form



## DEFINITIONS USED IN TOWER HAMLETS SCHEMES

“the Application Year”	the academic year in which the parent makes an application, i.e. in relation to the academic year of entry, the academic year preceding it.
“the Board”	the Pan London Admissions Executive Board.
“the Business User Guide (BUG)”	the document issued annually to all LAs participating in the Pan-London Co-ordinated Scheme.
“the Common Application Form”	this is the form that parents must use to make their applications, set out in rank order.
“the Equal Preference System”	the model whereby all preferences listed by parents on the Common Application Form are considered under the over-subscription criteria for each school without reference to parental rankings. Where a pupil is offered a place at more than one school within an LA, the rankings are used to determine the single offer by selecting the one ranked highest of the places offered.
“the Highly Recommended Elements”	the elements of Pan London Scheme that are not mandatory but to which subscription is strongly recommended in order to maximise co-ordination and thereby simplify the application process as far as possible.
“the Home LA”	the LA (local authority) in which the applicant/parent is resident.
“the Address Verification Register	the document containing the address verification policy of each participating LA.
“the Local Admission System (LAS)”	the IT module for administering admissions and for determining the highest offers within Tower Hamlets and between neighbouring authorities.
“the E-admissions Portal”	the common online application system used by the 33 London LAs and Surrey County Council.
“the Maintaining LA”	the LA which maintains a school to which an applicant has applied.

“the Mandatory Elements”	those elements of the Pan-London Scheme to which participating authorities must subscribe.
“the Notification Letter”	the agreed form of letter sent to applicants on the Prescribed Day, which communicates any determination granting or refusing admission to a primary school, which is attached as Schedule 2.
“the Prescribed Day”	the day on which outcome letters are posted to parents  Reception (Primary Schools): <b>18<sup>th</sup> April 2017</b> Year 7 (Secondary Schools): <b>1<sup>st</sup> March 2017</b>
“the Pan-London Register (PLR)”	the computer database that transmits application and offer data between each LA’s Local System.
“the Pan London Timetable”	the framework for making and processing applications attached as Schedule 3.
“the Participating LA”	any LA that has indicated in the ‘Memorandum of Agreement’ that they are willing to incorporate, at a minimum, the mandatory elements of the Pan London scheme presented here.
“the Qualifying Scheme”	the scheme which each LA is required to formulate in accordance with ‘The School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) Regulations 2012’, for co-ordinating arrangements for the admission of children to maintained primary and secondary schools and academies.

## Proposed Scheme for the Co-ordination of Admissions to Reception in 2017/18

### When children can start primary school in Tower Hamlets

All children of reception age (i.e. those born between 1<sup>st</sup> September 2012 and 31<sup>st</sup> August 2013) can start school in September 2017. However, parents can ask for their child's entry to be deferred until later in the school year. When a place is deferred the LA cannot offer it to another child. Parents will be advised of their right to defer in the 'Starting School in Tower Hamlets' booklet and in the letter notifying them of the school of which a place can be offered.

### ADMISSIONS NUMBERS

A list of admission numbers for each primary school is published in the LA's composite prospectus for school admissions.

### APPLICATIONS

1. All primary schools, nurseries and early years centres will advise Tower Hamlets LA of all children on roll that are eligible for admission in the following academic year. Tower Hamlets LA will forward details of Out of Borough residents to the home LA
2. Tower Hamlets residents will make their applications on the Tower Hamlets LA Common Application Form (CAF), which will be available from September 2016 and will be able to be submitted on-line. The form will include all the fields and information specified in Schedule 1. Applications to Out of Borough schools can also be made on this CAF.
3. Tower Hamlets LA will take reasonable steps to ensure that the parent(s) of a child living in Tower Hamlets due to start primary school in 2017/18 receives a copy of the 'Starting School in Tower Hamlets' booklet, including details of how to apply online. The booklet will also be available to parents who do not live in Tower Hamlets and will contain information on how non-Tower Hamlets residents access their home LA'S booklet and CAF.
4. Tower Hamlets residents will be able to express a preference for a maximum of six schools whether the schools are in Tower Hamlets or in another Local Authority.
5. The separate admission authorities within this LA will use supplementary information forms where there is not sufficient information on the CAF for consideration of the application against the published oversubscription criteria. This will normally only be in circumstances where schools require additional information relating to membership of a particular faith. The supplementary form will be available on the school's website and should be completed and returned to the school concerned. The LA will seek to ensure that supplementary forms only collect information that is required by the published oversubscription criteria, in accordance with paragraph 2.4 the School Admissions Code 2014.
6. Where a school in Tower Hamlets receives a supplementary information form, it will not be considered as a valid application unless the parent has also listed the school on their CAF, in accordance with the School Admissions Code. All Supplementary Forms will be made available on the Tower Hamlets website and details of Tower Hamlets School requiring a Supplementary Form will be stated in the 'Starting School in Tower Hamlets' booklet.

7. All preferences expressed on the CAF for maintained schools will be valid preferences. The order of preference given on the CAF will not be revealed before the offer date. If there is a preference to a non-Tower Hamlets school the order of preference for that school will be revealed to the Home LA. This is to ensure that only the highest ranked offer is made.
8. Applicants must return the CAF, which will be available and can be submitted on-line to this LA by **15<sup>th</sup> January 2017**.
9. Schools which receive the CAF (whether or not the family live in Tower Hamlets) must send these to Tower Hamlets LA by the closing date for applications – **15<sup>th</sup> January 2017**.
10. All applications made to non-Tower Hamlets Schools containing evidence of any Looked After children will be confirmed to the Home LA, by **3<sup>rd</sup> February 2017**.
11. All applicants in Tower Hamlets nurseries will have their address verified as set out in the Business User Guide. Pupil Services will notify the Home LA of any discrepancies of address for an applicant applying to one of their schools, by **17<sup>th</sup> February 2017**.
12. Pupil Services will advise the maintaining LA of the reason for any preference expressed for a school in its area of a child applying for a school that is born outside of the correct age cohort. All details and information to be forwarded by **3<sup>rd</sup> February 2017**.

## PROCESSING

13. Applicants' resident within Tower Hamlets must return the Common Application Form, which can be completed and submitted on-line, by **15<sup>th</sup> January 2017**.
14. Application data relating to all preferences for schools in other participating LAs, which have been expressed within the terms of this LA's scheme, will be up-loaded to the PLR by **6<sup>th</sup> February 2017**. Supplementary information provided with the Common Application Form will be sent to maintaining LAs by the same date.
15. Pupil Services shall, in consultation with the admission authorities within the Tower Hamlets borough and within the framework of the Pan-London timetable in Schedule 3, determine and publish its own timetable for the processing of preference data and the application of published oversubscription criteria.
16. Tower Hamlets LA will accept late applications and treat them as though they were received on time, only if they are late for a good reason. Examples of what will be considered as "good reason" includes: when a single parent has been very ill during the relevant period, or has been dealing with the death of a close relative; a family has just moved into the area. Other circumstances will be considered and each case decided on its own merits
17. If late applications that are being treated as having been received on time include preferences for schools in other LAs, Tower Hamlets LA will forward the details to the maintaining LAs via the PLR as they are received.

18. The latest date for the upload to the PLR of late applications which are being treated as having been received on-time is **10<sup>th</sup> February 2017**.
19. Where an applicant moves from one participating home LA to another after submitting an on-time application under the terms of the former home LA's scheme, the new home LA will accept the application as on-time up to **10<sup>th</sup> February 2017**, on the basis that an on-time application already exists within the Pan-London system.
20. Tower Hamlets will participate in the application data checking exercise scheduled between **17<sup>th</sup> and 24<sup>th</sup> February 2017** in the Pan-London timetable in 3A.
21. All preferences for schools within Tower Hamlets LA will be considered by the relevant admission authorities without reference to rank order in accordance with paragraph 1.9 of the School Admissions Code 2014. When the admission authorities within Tower Hamlets have provided a list of applicants in criteria order to this LA, this LA shall, for each applicant to its schools for whom more than one potential offer is available, use the highest ranked preference to decide which single potential offer to make. [This is the 'Equal Preference System'.]
22. Tower Hamlets LA will carry out all reasonable checks to ensure that pupil rankings are correctly held in its LAS before uploading data to the PLR.
23. Tower Hamlets LA will upload the highest potential offer available to an applicant for a school in this LA to the PLR by **16<sup>th</sup> March 2017**. The PLR will transmit the highest potential offer specified by the Maintaining LA to the Home LA.
24. The LAS of Tower Hamlets LA will eliminate, as a Home LA, all but the highest ranked offer where an applicant has more than one potential offer across maintaining LAs submitting information within deadline to the PLR. This will involve exchanges of preference outcomes between the LAS and the PLR (in accordance with the iterative timetable published in the Business User Guide) which will continue until notification that a steady state has been achieved or until **24<sup>th</sup> March 2017** if this is sooner.
25. Tower Hamlets LA will not make any additional offer between the end of the iterative process and **18<sup>th</sup> April 2017** which may impact on an offer being made by another participating LA.
26. Notwithstanding paragraph 24, if an error is identified within the allocation of places at one of Tower Hamlets LA's schools, the LA will attempt to manually resolve the allocation to correct the error. Where this impacts on another LA (either as a home or maintaining LA) this LA will liaise with that LA to attempt to resolve the correct offer and any multiple offers which might occur. However, if another LA is unable to resolve a multiple offer, or if the impact is too far reaching, this LA will accept that the applicant(s) affected might receive a multiple offer.
27. Tower Hamlets LA will participate in the offer data checking exercise scheduled between **27<sup>th</sup> March and 7<sup>th</sup> April 2017** in the Pan-London timetable in 3A.

28. Tower Hamlets LA will send a file to the E-Admissions portal with outcomes for all resident applicants who have applied online no later than **12<sup>th</sup> April 2017**. (33 London LAs and Surrey only)

## OFFERS

29. On **18th April 2017** Tower Hamlets LA will send a letter notifying parents of the school place provisionally offered. The letter will advise the following:
- The name of the school at which a place is provisionally offered.
  - The procedure and documentation required for the parent(s) to accept the offer by **5<sup>th</sup> May 2017**
  - If applicable, the reasons why the child is not being offered a place at any of the schools they nominated on the CAF.
30. Parents who do not obtain an offer at a preferred school may apply to schools that still have vacancies. Children who have not been offered a place at any school and late applicants will be offered a place at a school with places remaining.
31. Tower Hamlets LA shall use various forms of the notification letter set out in Schedule 2. Parents will be required to accept or decline the offer with the school at which the place is being offered.
32. Tower Hamlets LA will compile destination data of all its resident applicants by the end of the summer term 2016.

## POST OFFER

33. **Tower Hamlets** LA will request that resident applicants accept or decline the offer of a place by **5<sup>th</sup> May 2017**, or within two weeks of the date of any subsequent offer.
34. Where an applicant resident in Tower Hamlets LA accepts or declines a place at a school maintained by another LA by **5<sup>th</sup> May 2017**, Tower Hamlets LA will forward the information to the maintaining LA by **12<sup>th</sup> May 2017**. If information is received from applicants after **12<sup>th</sup> May 2017**, Tower Hamlets LA will pass it to the maintaining LA as it is received.
35. Where a place becomes available in an oversubscribed maintained school or academy in this LA's area, it will be offered from a waiting list ordered in accordance with paragraph 2.14 of the School Admissions Code 2014.
36. Tower Hamlets will inform the home LA, where different, of an offer for a maintained school in Tower Hamlets LA's area which can be made to an applicant resident in the home LA's area, in order that the home LA can offer the place.
37. When acting as a maintaining LA, Tower Hamlets LA, and the admission authorities within it, will not inform an applicant resident in another LA that a place can be offered.
38. Tower Hamlets LA will offer a place at a maintained school in the area of another LA to an applicant resident in Tower Hamlets area, provided that the school is ranked higher on the Common Application Form than any school already offered.

39. Where Tower Hamlets LA is informed by a maintaining LA of an offer which can be made to an applicant resident in Tower Hamlets LA's area which is ranked lower on the Common Application Form than any school already offered, it will inform the maintaining LA that the offer will not be made.
40. Where this LA, acting as a home LA, has agreed to a change of preference order for good reason, it must inform any maintaining LA affected by the change. In such cases, paragraphs 36 and 37 shall apply to the revised order of preferences.
41. Tower Hamlets LA will inform the home LA, where different, of any change to an applicant's offer status as soon as it occurs.
42. Tower Hamlets LA will accept new applications (including additional preferences) from home LAs for maintained schools in its area.
43. Parents who wish their children's names to be placed on the waiting list of a higher ranked school to the one offered or to any of the preferred schools if an offer has not been possible must notify Pupil Services by **5<sup>th</sup> May 2017**.
44. Tower Hamlets will seek to ensure that a place is not offered at a school which is ranked on the CAF as a lower preference than any school already offered to a parent.

## APPEALS

45. Parents have the right of appeal against the refusal of a place at any of the schools for which they have applied. Parents wishing to appeal to a Tower Hamlets community school must do so by **16<sup>th</sup> May 2017**. Tower Hamlets voluntary schools may have different arrangements and parents will be advised to contact the individual school for information.

## Proposed Scheme for the Co-ordination of Admissions to Year 7 in 2017/18

### When children start the Year 7 of Secondary School in Tower Hamlets

All children of born between 1<sup>st</sup> September 2005 and 31<sup>st</sup> August 2006 can start the Year 7 of secondary school in September 2017.

### APPLICATIONS

1. Tower Hamlets LA will advise home LAs of their resident pupils on the roll of this LA's maintained primary schools and academies who are eligible to make application in the forthcoming application year.
2. Applications from residents of Tower Hamlets will be made on the authority's Common Application Form (CAF), which will be available and able to be submitted on-line. This will include all the fields and information specified in Schedule 1. These will be supplemented by any additional fields and information where deemed necessary by this LA to enable admission authorities in Tower Hamlets to apply their published oversubscription criteria.
3. Tower Hamlets will take all reasonable steps to ensure that every parent who is resident in this LA and has a child in their last year of primary education within a maintained school, either in Tower Hamlets or any other maintaining LA, receives a copy of this LA's admissions booklet and CAF, **including details of how to apply online**. The admissions booklet will also be available to parents who do not live in Tower Hamlets, and will include information on how they can access their home LA's CAF.
4. Tower Hamlets LA and the admission authorities within this LA i.e. Bishop Challoner, Raine's and Sir John Cass Foundation Schools will use supplementary forms to collect information which is required by the school's published oversubscription criteria and not available through the CAF. The LA will seek to ensure that information collected is in accordance with paragraph 2.4 of the School Admissions Code 2014.
5. Where Tower Hamlets or the other admission authorities within the LA use a supplementary form, they will be available on the Tower Hamlets website. The Tower Hamlets admission booklet will indicate which schools in Tower Hamlets require supplementary forms to be completed and where they can be obtained. Such forms will advise parents that they must complete their Home LA's CAF. An application will not be considered to be a valid application unless the parent has also listed the school on their home LA's CAF, in accordance with the School Admissions Code 2014.
6. Applicants will be able to express a preference for six maintained secondary schools or Academies within and/or outside Tower Hamlets.
7. The order of preference given on the CAF will not be revealed to a school within the Authority area in accordance with paragraph 1.9 of the School Admissions Code 2014. However, where a parent resident in this LA expresses a preference for schools in the area of another LA, the order of preference for that LA's schools will be revealed to that LA in order that it can determine the highest ranked preference in cases where an applicant is eligible for a place at more than one school in that LA's area.



8. Tower Hamlets LA undertakes to carry out address verification process as set out in its entry in the LIAAG Address Verification Register. This will in all cases include the validation of resident applicants against Tower Hamlets primary school data and the further investigation of any discrepancy. Where this LA is not satisfied as to the validity of an address of an applicant whose preference has been sent to a maintaining LA, it will advise the maintaining LA no later than the **12<sup>th</sup> December 2016**.
9. Tower Hamlets LA will confirm the status of any resident child for whom it receives a CAF stating s/he is a 'Child Looked After' and will provide evidence to the maintaining LA in respect of a preference for a school in its area by **11th November 2016**.
10. Tower Hamlets LA will advise a maintaining LA of the reason for any preference expressed for a school in its area, in respect of a resident child born outside of their correct age cohort, and will forward any supporting documentation to the maintaining LA by the **11<sup>th</sup> November 2016**.

## PROCESSING

11. Applicants resident within Tower Hamlets must return the CAF, which will be available and able to be submitted on-line, to this LA by **31<sup>st</sup> October 2016**. This closing date applies to all LAs participating in the Pan London co-ordinated admissions arrangements. However, Tower Hamlets LA will publish information which encourages applicants to submit their application by the **21<sup>st</sup> October 2016 (i.e. the Friday before half term)**, to allow sufficient time to process and check all applications before the mandatory date when data must be sent to the PLR.
12. Application data relating to all preferences for Tower Hamlets residents applying to maintained schools in the area of other participating LAs, which have been expressed within the terms of the Tower Hamlets scheme, will be up-loaded to the PLR by **11th November 2016**. Supplementary forms mistakenly sent with the CAF will be sent to maintaining LAs and TH admission authorities by the same date, where possible.
13. Tower Hamlets, in consultation with the admission authorities within its area and within the framework of the Pan-London Timetable in Schedule 3B, will determine its own timetable for the processing of application data and the application of published oversubscription criteria.
14. Tower Hamlets will accept late applications only if they are late for a good reason. Examples of what will be considered as good reason include: when a single parent has been ill during the relevant period, or has been dealing with the death of a close relative; a family has just moved into the area. Other circumstances will be considered and each case decided on its own merits.
15. Where such applications contain preferences for schools in other LAs, Tower Hamlets will forward the details to maintaining LAs via the PLR as they are received. Tower Hamlets will accept late applications which are considered to be on time within the terms of the home LA's scheme, providing they are uploaded to the PLR by the latest date i.e. **12<sup>th</sup> December 2016**.

16. If, after submitting an on-time application, an applicant moves from Tower Hamlets to another participating LA or vice versa, it will be accepted and treated as on-time up to **12th December 2016**. This is on the basis that an on-time application already exists within the Pan-London system.
17. Tower Hamlets LA will participate in the application data checking exercise scheduled between the **13<sup>th</sup> December 2016 and 3rd January 2017** in the Pan London Timetable in Schedule 3B.
18. All preferences for schools within Tower Hamlets will be considered by the relevant admission authorities without reference to rank order in accordance with paragraph 1.9 of the School Admission Code 2012. Once each Tower Hamlets admission authority has ranked its applicants in criteria order and provided its list to the LA, Tower Hamlets LA shall, for each applicant to its schools for whom more than one potential offer is available, use the highest ranked preference to decide which single potential offer to make. [This is the 'Equal Preference System']
19. Tower Hamlets LA will carry out all reasonable checks to ensure that pupil rankings are correctly held in its LAS before uploading data to the PLR.
20. Tower Hamlets will upload the highest potential offer available to an applicant for a maintained school in this LA to the PLR by **3<sup>rd</sup> February 2017**. The PLR will transmit the highest potential offer specified by the Maintaining LA to the Home LA.
21. The LAS of Tower Hamlets LA will eliminate, as a Home LA, all but the highest ranked offer where an applicant has more than one potential offer across Maintaining LAs submitting information within deadline to the PLR. This will involve exchanges of information between the LAS and the PLR (in accordance the iterative timetable published in the Business User Guide) which will continue until notification that a steady state is achieved (which the PLR will indicate), or until **16<sup>th</sup> February 2017** if this is sooner.
22. Tower Hamlets LA will not make an additional offer between the end of the iterative process and **1<sup>st</sup> March 2017**, which may impact on an offer being made by another participating LA.
23. Notwithstanding paragraph 22, if an error is identified within the allocation of places at one of Tower Hamlets schools, Tower Hamlets LA will attempt to manually resolve the allocation to the correct the error. Where this impacts on another LA (either as home or maintaining LA) Tower Hamlets LA will liaise with the other LA in an attempt to resolve the correct offer and any multiple offers. However, if the other LA is unable to resolve a multiple offer, or is the impact is too far reaching, Tower Hamlets LA will accept that the applicants affected might receive a multiple offer.
24. Tower Hamlets LA will participate in the offer data checking exercise scheduled between the **17<sup>th</sup> and 23<sup>rd</sup> February 2017** in Pan London timetable in Schedule 3B.

25. Tower Hamlets LA will send a file to the E-Admissions portal with outcomes for all resident applicants who have applied online no later than **24<sup>th</sup> February 2016**. (33 London LAs and Surrey only).

## OFFERS

26. Tower Hamlets LA will inform all residents applicants of their highest offer of a school place and, where relevant, the reason why higher preferences were not offered. Whether they were for schools in Tower Hamlets or in other participating LAs.
27. For Tower Hamlets residents for whom a place cannot be offered at any of the schools listed on the CAF on the **1<sup>st</sup> March 2017**. There will be an opportunity to state further preferences between March and Mid-April. Parents of pupils still unplaced by the week ending **18<sup>th</sup> April 2016** will be notified of a school at which a place is reserved.
28. The Tower Hamlets LA outcome letter will include the information set out in schedule 2.
29. On **1<sup>st</sup> March 2017** Tower Hamlets LA will send by first class post notification of the outcome to resident applicants.
30. Tower Hamlets will provide its primary schools with destination data of its resident applicants by the end of February and provide updates at regular intervals throughout the summer term of 2016.

## POST OFFER

31. Tower Hamlets secondary schools must contact successful applicants immediately after the **3<sup>rd</sup> March 2016** to confirm the offer of a place and the arrangements for admission. They will notify Tower Hamlets LA of any pupils for whom an offer of place is declined and the reasons for this.
32. Tower Hamlets LA will request that its resident applicants, who have been offered a place at a school maintained by another LA, accept or decline the offer by the **15<sup>th</sup> March 2017**, or within two weeks of the date of any subsequent offer.
33. Where an applicant resident in Tower Hamlets LA accepts or declines a place in a school maintained by another LA by **15<sup>th</sup> March 2017**, Tower Hamlets LA will forward the information to the maintaining LA by **22<sup>nd</sup> March 2017**. Where such information is received from applicants after **17<sup>th</sup> March 2017**, Tower Hamlets LA will pass it to the maintaining LA as it is received.
34. Where a place becomes available in an oversubscribed maintained school or academy in Tower Hamlets LA, it will be offered from a waiting list ordered in accordance with paragraph 2.14 of the School Admissions Code 2014.
35. When acting as a maintaining LA, Tower Hamlets LA will inform the home LA, where different, of an offer for a maintained school or Academy in the Tower Hamlets area which can be made to an applicant resident in the home LA's area, in order that the home LA can offer the place.
36. When acting as a maintaining LA, Tower Hamlets LA, and the admission authorities within it, will not inform an applicant resident in another LA that a place can be offered.

37. When acting as a home LA, Tower Hamlets LA will offer a place at a maintained school or Academy in the area of another LA to an applicant resident in its area, provided that the school is ranked higher on the Common Application Form than any school already offered.
38. When acting as a home LA, when Tower Hamlets LA is informed by a maintaining LA of an offer which can be made to an applicant resident in Tower Hamlets which is ranked lower on the Common Application Form than any school already offered, it will inform the maintaining LA that the offer will not be made.
39. When acting as a home LA, Tower Hamlets LA has agreed to a change of preference order for good reason, it will inform any maintaining LA affected by the change. In such cases, paragraphs 35 and 36 shall apply to the revised order of preferences.
40. When acting as a maintaining LA, Tower Hamlets LA will inform the home LA, where different, of any change to an applicant's offer status as soon as it occurs.
41. When acting as a maintaining LA, Tower Hamlets LA will accept new applications (including additional preferences) from home LAs for maintained schools and academies in its area.
42. The Tower Hamlets LA secondary admissions booklet explains how waiting lists operate. In-Year admissions will be in accordance with the co-ordinated in-year admission scheme.

## APPEALS

43. Parents have the right of appeal against the refusal of a place at any of the schools for which they have applied. Parents wishing to appeal to a Tower Hamlets community school must do so by **29<sup>th</sup> March 2017**. Tower Hamlets voluntary schools may have different arrangements and parents will be advised to contact the individual school for information.

**This LA's Common Application Form for Admissions to Reception and Year 7 will contain the following fields as a minimum.**

**Child's details:**

Surname  
Forename(s)  
Middle name(s)  
Date of Birth  
Gender  
Home address  
Name of current nursery, school or under 5s provision

**Parent(s) / Carer(s) details:**

Title  
Surname  
Initials or Forename  
Address (if different to child's address)  
Telephone Number (Home, Daytime, Mobile)  
Email address  
Relationship to child

**Preference details (up to 6)**

Name of school  
Address of school  
Preference ranking  
Local Authority in which the school is based

**Additional information:**

Reasons for preference (including any medical or social reasons)  
Does the child have a statement of SEN? Y/N\*  
Is the child in the public care of a local authority / looked after? Y/N  
Is the child formerly CLA but now adopted or subject of a 'Residence Order' or 'Special Guardianship Order'? Y/N  
If yes, name of responsible authority  
Surname of sibling  
Forename of sibling  
DOB of sibling  
Gender of sibling  
Name of school sibling attends

**Other:**

Declaration and signature of parent or carer  
Date of signature

**Tower Hamlets Co-ordinated Admission Scheme**  
**(Template Outcome Letter for Admissions to Reception and Year 7 in 2014/15)**

From: Home LA

Date: **1 March 2017 (sec)**  
**18 April 2017 (prim)**

Dear Parent,

## Application to School

*I am writing to advise you that there is a place for «pupil\_firstname» «pupil\_surname» at \_\_\_\_\_ School for September 2017. This offer is subject to you providing the school with proof of your child's date of birth and current address by the \_\_\_\_\_ (2 weeks from date of offer).*

*This was the school you named as your \_\_\_\_\_ preference on the application form and the Headteacher will soon be in contact with you to make the necessary arrangements for «pupil\_firstname» admission in September.*

*Offers which could have been made for any schools you placed lower on your list of preferences, were automatically withdrawn(cancelled) under the co-ordinated admission arrangements as a higher preference has been offered.*

I am sorry that a place could not be offered at any of the schools you listed as a higher preference on your application form. For each of these schools there were more applications than places available and other applicants had a higher priority than your child under the school's admission policy. If you would like more information about the reason that your child was not offered a place at any higher preference school, you should contact the admission authority that is responsible for admissions to the school within the next few days. Details of the different admission authorities for Tower Hamlets are attached to this letter. If the school is outside Tower Hamlets, the admission authority will either be the borough in which the school is situated, or the school itself.

If you would like your child's name to be placed on the waiting list(s) for a Tower Hamlets community school you must contact Pupil Services telephone 020-364 5006 or e-mail: [schooladmissions@towerhamlets.gov.uk](mailto:schooladmissions@towerhamlets.gov.uk).

You have the right of appeal against the decision not to offer a place at your preferred school(s). If the appeal is for a Tower Hamlets school please use the enclosed appeal form. You **must** state your reasons for appealing and return it in the reply paid envelope by \_\_\_\_\_. You should use a separate appeal form for every school you appeal for.

If your appeal is for a school that is not in Tower Hamlets, you should contact the admission authority for that school for information on the waiting list and appeal procedures. It is in your interests to do so as soon as possible.

*\* If you are unable to take up the place at \_\_\_\_\_ for any reason, please contact the Pupil Services Team immediately on 020-7364 5006 or email [schooladmissions@towerhamlets.gov.uk](mailto:schooladmissions@towerhamlets.gov.uk).*

Yours sincerely

*(First preference offer letters will include the paragraphs in italics only)*

**\* The following paragraph will replace the one above for Tower Hamlets parents who receive an offer of a place at a school outside of Tower Hamlets:**

*Please confirm that you wish to accept the place at X School by completing the reply slip below. If you do not wish to accept the place, you will need to let me know what alternative arrangements you are making for your child's education. Please return the reply slip by 15<sup>th</sup> March 2017 (secondary) / 2<sup>nd</sup> May 2017 (primary).*

**Key dates in the timetable for the Co-ordination of Admissions to Reception**

<b>15 Jan 2017</b>	Statutory deadline for receipt of applications
<b>3 Feb 2017</b>	Deadline for the transfer of application information by the Home LA to the PLR (ADT file)
<b>10 Feb 2017</b>	Deadline for the upload of late applications to the PLR.
<b>17 Feb – 24 Feb 2017</b>	Checking of application data
<b>16 Mar 2017</b>	Deadline for the transfer of potential offer information from the maintaining LAs to the PLR (ALT file).
<b>24 Mar 2017</b>	Final ALT file sent to PLR
<b>24 Mar – 10 Apr 2017</b>	Checking of offer data
<b>12 Apr 2017</b>	Deadline for on-line ALT file to portal
<b>18 Apr 2016</b>	Notification letters posted.
<b>5<sup>th</sup> May 2017</b>	Deadline for receipt of acceptances
<b>9 May 2017</b>	Deadline to request a place on a school Waiting List
<b>12<sup>th</sup> May 2017</b>	Deadline for transfer of acceptances to maintaining LAs
<b>16<sup>th</sup> May 2017</b>	Closing date for appeals to be lodged



**Key dates in the timetable for the Co-ordination of Admissions to Year 7**

<b>21 Oct 2016</b>	Published closing date (Friday before half-term)
<b>31 Oct 2016</b>	Statutory deadline for submission of the Common Application Form by parents to home local education authority.
<b>11 Nov 2016</b>	Deadline for the transfer of application information by the Home LA to the PLR.
<b>12 Dec 2016</b>	Deadline for the upload of late applications to the PLR.
<b>13 Dec 2016 - 3 Jan 2017</b>	Checking of application data
<b>3 Feb 2017</b>	Deadline for the transfer of potential offer information from the Maintaining LAs to the PLR.
<b>16 Feb 2017</b>	Final ALT file to PLR
<b>17 - 23 Feb 2017</b>	Checking of offer data
<b>24 Feb 2017</b>	Deadline for on-line ALT file to portal
<b>1 Mar 2017</b>	The Offer Day – the date on which notification letters are sent out.
<b>15 Mar 2017</b>	Deadline for Tower Hamlets residents to confirm acceptance of a place at an out-borough school.
<b>22 Mar 2017</b>	Deadline for transfer of acceptances to maintaining LAs





Last name:

Sex: Male  Female  Date of Birth Day   Month   Year

**5 Declaration and signature of the parent or carer**

I am the person with parental responsibility for the child named above and the information given is true. I understand that false or misleading information may result in the offer of a place being withdrawn.

Signature:  Date:

Please complete and return to: Pupil Services, Mulberry Place, 5 Clove Crescent, London E14 2BG. Fax: 0207 364 4311 by **31<sup>st</sup> October 2016**

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# TOWER HAMLETS CHILDREN'S SERVICES

## PROPOSED SCHEME FOR

### IN-YEAR ADMISSIONS in 2017/18



**Version:** 1.0

**Date issued:** 1<sup>st</sup> November 2015

**Prepared by:** Pupil Services  
Children's Services  
Directorate



# THE TOWER HAMLETS LA SCHEME FOR CO-ORDINATED IN-YEAR ADMISSIONS IN 2017/18

## DEFINITIONS

“the LA”	the Local Authority
“the Maintaining LA”	the LA which maintains a school to which an applicant has applied
“the Home LA”	the LA (local authority) in which the applicant/parent is resident
“the Application Year”	the academic year in which the parent makes an application i.e. in relation to the academic year of entry, the academic year preceding it.
“The LA In-Year Admission Form”	this is the LA form that all parents must use to make their applications, set out in ranked order
“the Equal Preference System”	the model whereby all preferences listed by parents on the In-Year Admission Form are considered under the over-subscription criteria for each school without reference to parental rankings. Where a pupil is offered a place at more than one school, the rankings are used to determine the single offer by selecting the one ranked highest of the places offered
“the Code”	the School Admissions Code imposes mandatory requirements on LAs and Councils in England and refers to statutory requirements which all admission authorities must comply with. A copy can be found at <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/389388/School_Admissions_Code_2014_-_19_Dec.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/389388/School_Admissions_Code_2014_-_19_Dec.pdf</a>
“the Local Admission System (LAS)”	the IT module for administering admissions and for determining the highest offer within Tower Hamlets
“the Notification Letter”	the agreed form of letter sent to an applicant that communicates any determination granting or refusing admission.
‘Own Admission Authority’	Schools that are responsible for setting their own admissions criteria and determining admissions themselves i.e. voluntary aided, academies and free schools.



## INTRODUCTION

This document outlines the co-ordinated In-Year school admissions arrangements in the London Borough of Tower Hamlets for the 2017/18 academic year. These arrangements are set out in accordance with the mandatory requirements in the School Admissions Code (Dec 2014) and apply to admission arrangements for admission in the school year 2017/18.

In line with changes in the school admission regulations, the Tower Hamlets co-ordinated admission arrangements no longer require **own admission authority** (i.e. academies, free and voluntary aided schools) schools to receive their in-year applications via the LA. However, following consultation with its Admission Forum, the LA believes that co-ordinating in-year admissions is the most effective way for ensuring that children out of school are tracked, monitored and placed in education as quickly as possible. This safeguarding element has been a particular strength of in-year coordination since its introduction and there is a substantial risk that vulnerable children and young people may 'slip through the net', if the LA reverts back to a system whereby applications are made direct to individual schools. **Own admission authority** schools are therefore urged to abide with the LA's procedures for co-ordinating the application stage of the process, whilst being able to issue the outcome direct to the applicant and notify the LA accordingly.

Tower Hamlets Local Authority will therefore continue, as far as possible, to coordinate in-year admissions as the maintaining Local Authority. Full details of the scheme are below, but the key features are as follows:

- Applicants wanting to apply for schools and academies within Tower Hamlets **must** apply on the LA's Common Application Form. Applicants can name up to three schools in order of preference.
- Tower Hamlets residents wishing to apply for schools in other boroughs **must** apply according to that borough's admission arrangements. This may involve applying directly to the relevant admission authority or via Tower Hamlets.
- The formal notification of the application outcome is made by the maintaining LA/**own admission authority** school.
- The Tower Hamlets Pupil Services Team will continue to directly administer community and voluntary controlled school admissions, including waiting lists for community schools.
- **Own admission authority** schools will continue to administer their own waiting lists and determine whether a place can be offered. VA schools and Canary Wharf College Free Schools will retain a supplementary form (for applicants applying for a place on faith grounds).
- It is critical for the Pupil Services Team to hold up-to-date information about school vacancies so that correct advice can be provided to parents. Schools that are on SchoolView must update their roll numbers directly on the system. Pupil Services will also, collect data from its schools using secure data exchange methods to confirm the roll numbers and other details for each year group.
- All Schools, including own admission authority schools are reminded that they are legally obliged to fill vacancies in any year group where the number of pupils on roll is below the published admission number irrespective of their admissions criteria.
- Unsuccessful applicants have a right of appeal to an independent appeal panel. Own admission authority schools must make arrangements for hearings although the LA will be able to facilitate this for them for a charge.

## ADMISSION NUMBERS

The admission numbers of all primary and secondary schools are set out in LA's composite prospectus.

## APPLICATIONS

1. This scheme applies to all applicants for maintained schools and academies within Tower Hamlets.
2. Applications must be made on the **LA In-Year Application/Transfer Form**, which will be available from the Pupil Services Team, Tower Hamlets schools and academies.
3. Applicants will be able to express a preference for up to three maintained schools and academies within Tower Hamlets.
4. Applicants must return the **LA In-Year Application/Transfer Form** to the Pupil Services Team.
5. Any preferences made for own admission authority schools in Tower Hamlets will be available for schools to see using SchoolView within 5 school days. If an own admission authority school receive applications directly, they must notify the Pupil Services Team immediately and advise the applicant they must complete the application form issued by the LA.
6. The order of preference given on the **LA In-Year Application/Transfer Form** will not be revealed to individual schools.
7. **Own admission authority schools** within Tower Hamlets may use supplementary information forms where there is not sufficient information on the LA Form for consideration of the application against the published oversubscription criteria. **This must only be in circumstances where schools require additional information relating to membership of a particular faith.** The supplementary form should be completed and returned to the school concerned. The LA will seek to ensure that supplementary forms only collect information that is required by the published oversubscription criteria, in accordance with the Admissions Code of Practice (Dec 2014).
8. Where an own admission authority school in Tower Hamlets receives a supplementary form, it will advise the parent/carer to complete the **LA In-Year Application/Transfer Form** to formally register their application.
9. Tower Hamlets LA will notify the Home LA of all applications submitted for children who are not borough residents, in accordance with the agreed protocol for the exchange of information between London LAs. This procedure is to ensure the Home LA has an overview of children without a school place and school to school transfer requests and retains its safeguarding responsibilities.
10. Tower Hamlets LA will confirm the status of any resident child for whom it receives a Common Application Form stating s/he is a child looked after, became subject to an adoption, residence, or special guardianship order, and will notify the Home LA if the child is not resident in Tower Hamlets.

## PROCESSING

11. To determine the availability of places, all Tower Hamlets schools and academies will be required to provide the Pupil Services Team, on request, their roll number, vacancies and waiting list numbers (own admission authority schools) for each year group. Schools will also be required to maintain an accurate record of their vacancies across all year groups using SchoolView.
12. The Pupil Services Team will carry out the following functions to process applications for schools and academies:
  - where the **LA In-Year Application/Transfer Form** is not fully completed, the applicant will be notified the application is invalid until all the information is received. If the child is without a school place then an offer or allocation will be made whilst the relevant information is obtained.
  - refer to the Local Admissions Pupil Database (LAPD) to validate any current school the child may attend, if the application is a 'school to school' transfer request, or current/most recent education provision has not been provided.
  - use a secure means to exchange data with its schools, academies and other LAs.
13. Where an applicant has expressed a preference for one or more schools/academies outside of Tower Hamlets, application details will be passed to the maintaining LA to process for the schools applied for in that borough. Some maintaining LAs will require that applications are made directly to them or to the admissions authority. Pupil Services will advise parents if this is the case.

## NOTIFICATION OF OUTCOME:

### CHILDREN WITHOUT A SCHOOL PLACE

14. Pupil Services will aim to notify the outcome of an application made for community and voluntary controlled schools by letter within **10 school days**. The letter will advise the following:
  - a. The name of the school at which a place is provisionally offered
  - b. The procedure and documentation required for the parent(s) to accept the offer including the requirement for them to provide the schools with the necessary proof of address and guardianship.
  - c. If applicable, the reasons why the child is not being offered a place at any of the other schools they named on the application form, the opportunity to be added to a waiting list and details of their right of appeal.
15. Where it is evident that more than one school place can be offered, Pupil Services will eliminate all but the highest ranked offer where an applicant has ranked schools in order of preference on the **LA In-Year Application/Transfer Form**. Any lower preferences will be withdrawn at this point.
16. Where it is evident that more than one school place can be offered as a result of liaison with applications made to school(s) in other LAs, Pupil Services will contact the family to establish which offer will be accepted and free up any potential multiple offers.

17. Parents of Tower Hamlets children who cannot be offered a place at any of their preferred schools will be advised of the school at which a place has been reserved, which may be a community, voluntary or academy school.

**Where the LA is not the admission authority, notifications can be made in the following ways:**

18. **Own admission authority schools** can notify parents/carers direct on the outcome of applications referred by LA. However, they will need to advise the Pupil Services Team beforehand so that decisions are co-ordinated and that the LA is able to ensure that children are not missing education.
19. Where a child is resident in **another borough**, the Pupil Services Team will notify the parent of the outcome and, where necessary, advise about the waiting list and their right of appeal. The contact details for the Home LA will be provided in the notification letter. The Home LA will be informed of the outcome of the application, in accordance with the agreed protocol for the exchange of information between London LAs.
20. All Tower Hamlets schools (including **own admission authority schools**) must also adhere to the requirement to admit children referred by Pupil Services under the provision of the locally agreed Fair Access Protocol, as required by 3.12 of the School Admissions Code.

## CHILDREN WHO ARE CURRENTLY IN SCHOOL (SCHOOL TRANSFER)

21. In most cases, school to school transfers will take place according to the LA's published transfer timetable. Exceptions may be made on cases where children are making an unreasonable journey to a school or where there is an exceptional medical or social need for early transfer, but these will only be agreed following discussion with all parties involved.
22. Where an offer can be made for a child currently on roll at another Tower Hamlets school, Pupil Services will notify the child's current school in accordance with the transfer timetable.

## POST OFFER

23. Schools and academies are required to admit children within **10 school days** of the date of the notification letter except in cases of transfer between schools in Tower Hamlets. In these circumstances, the transfer should take place at the beginning of the next half term.
24. Where a child does not take up the place within the relevant timeframe the school must notify the Pupil Services Team. Pupil Services will then make effort to contact the family to find out whether or not they wish to accept the place, and notify the offered school. Only where there is no response, and it can be demonstrated that every effort has been made to contact the family, will the offer of a place be withdrawn.
25. In cases where an offer of a school place has been rejected and it is evident that no alternative provision has been arranged for the child by the parent/carer, the Pupil Services Team will carry out a home visit or refer the family's details to the Attendance and Welfare Service or the Home LA, if the child is not resident in Tower Hamlets. The LA will expect schools to attempt to contact families by all means available, including email and letter to the family if there is no response before taking the appropriate action.

26. Once a school offer is made, any other applications/preferences will be withdrawn and families will need to reapply if they wish to be added to the waiting lists for any further schools.
27. If a family refuse more than two transfers in an academic year, without reasonable justification, then their application will be withdrawn and they will not be considered for any further transfers in that academic year. If the application has previously been awarded priority (such as Medical/social or Children who are out of school) on a waiting list, and the family then refuse the offer, the priority status may be removed.
28. For children not in receipt of education, delay in a straightforward admission to a school where a vacancy has been identified should be avoided. The Pupil Services Team will work closely with its schools to place the child on roll as soon as reasonably practical.
29. Where Pupil Services receives notification of an accepted offer for a child not resident in Tower Hamlets, this information will be shared with the Home LA.

## APPEALS

30. Parents have the right of appeal against the refusal of a place at any of the schools for which they have applied. **Own admission authority schools** must therefore ensure they inform parents of their right of appeal, and the arrangements for doing so, if they are unable to offer a place.
31. **Own admission authority schools** should also notify Pupil Services of all appeals that are lodged for the school along with the outcome, as soon as this is determined.
32. Where Pupil Services receives notice on the outcome of an appeal for a school in its area, this information will be shared with the Home LA for a child not resident in Tower Hamlets.

## WAITING LISTS

33. The waiting lists for all Tower Hamlets **community and voluntary controlled** schools will be held and administered by the Pupil Services Team for all year groups and will be ordered in accordance with the published admission criteria. Parents/carers that approach community schools direct, that want to be added to a waiting list, will be required to complete **LA In-Year Application/Transfer Form**.
34. **Own admission authority schools** will maintain their own waiting lists. When a place can be offered, the school will provide the Pupil Services Team with the details of the child that they have determined as the next eligible child on the list in accordance with their published admission criteria. Where necessary, the child's current school will be notified of the offer by the Pupil Services Team and the child will transfer at the beginning of the next half-term.
35. Children who are subject of a direction by the local authority to admit or who are allocated to a school in accordance with the Fair Access Protocol must take precedence over those on a waiting list.

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## Appendix F - PLANNED ADMISSION NUMBERS FOR SCHOOLS IN TOWER HAMLETS (2017/18)

No	Nursery and Primary Schools	Catchment Area	Nursery Class/ Early Years Unit	Type of School and Age Range	Number of places (Published Admission Number)	
1.	<b>Alice Model</b> Beaumont Grove, E1 4NQ	1	Yes	Nursery 3-5	N/A	
2.	<b>Arnhem Wharf</b> Arnhem Place, E14 3RP	4	Yes	Community 3-11	90	
3.	<b>Bangabandhu</b> Wessex Street, E2 0LB	1	Yes	Community 3-11	60	
4.	<b>Ben Jonson</b> Harford Street, E1 4PZ	1	No	Community 4-11	90	
5.	<b>Bigland Green</b> Bigland Street, E1 2ND	5	Yes	Community 3-11	60	
6.	<b>Blue Gate Fields Infant</b> King David Lane, E1 0EH	5	Yes	Community 3-7	90	
7.	<b>Blue Gate Fields Junior</b> King David Lane, E1 0EH	5	N/A	Community 7-11	N/A	
8.	<b>Bonner (Bethnal Green)</b> Stainsbury Street, E2 0NF	1	No	Community 4-11	60	
9.	<b>Bonner (Mile End)</b> Ropery Street, E3 4QE	2	Yes	Community 3-11	60	
10.	<b>Bygrove</b> Bygrove Street, E14 6DN	3	Yes	Community 3-11	30	
11.	<b>Canary Wharf College East Ferry</b> East Ferry Road, E14 3BA	N/A	No	Free 4-11	40	
12.	<b>Canary Wharf College Glenworth</b> Saunders Ness Road, E14 3EB	N/A	No	Free 4-11	40	

No	Nursery and Primary Schools	Catchment Area	Nursery Class/ Early Years Unit	Type of School and Age Range	Number of places (Published Admission Number)	
13.	<b>Canary Wharf College 3</b> (subject to a site being secured)	N/A	No	Free 4-16	40	
14.	<b>Canon Barnett</b> Gunthorpe Street, E1 7RQ	5	Yes	Community 3-11	45	
15.	<b>Cayley</b> Aston Street, E14 7NG	1	Yes	Community 3-11	90	
16.	<b>Children's House</b> Bruce Road, E3 3HL	2	Yes	Nursery 3-5	N/A	
17.	<b>Chisenhale</b> Chisenhale Road, E3 5QY	2	Yes	Community 3-11	45	
18.	<b>Christ Church CE</b> Brick Lane, E1 6PU	N/A	Yes	Voluntary 3-11	30	
19.	<b>Columbia</b> Columbia Road, E2 7RG	6	Yes	Community 3-11	60	
20.	<b>Columbia Market Nursery</b> Columbia Road, E2 7PG	6	Yes	Nursery 3-5	N/A	
21.	<b>Cubitt Town Infants</b> Manchester Road, E14 3NE	4	Yes	Community 3-7	90	
22.	<b>Cubitt Town Juniors</b> Manchester Road, E14 3NE	4	N/A	Community 7-11	N/A	
23.	<b>Culloden</b> Dee Street, E14 0PT	3	Yes	Academy 3-11	90	#
24.	<b>Cyril Jackson</b> Three Colt Street, E14 8HH	3	Yes	Community 3-11	60	#
25.	<b>Elizabeth Selby</b> Old Bethnal Green Road, E2 6PP	6	Yes	Community 3-7	75	
26.	<b>English Martyrs RC</b> St Mark Street, E1 8DJ	N/A	Yes	Voluntary 3-11	30	



No	Nursery and Primary Schools	Catchment Area	Nursery Class/ Early Years Unit	Type of School and Age Range	Number of places (Published Admission Number)	
27.	<b>Globe</b> Gawber Street, E2 0JH	1	Yes	Community 3-11	45	#
28.	<b>Guardian Angels RC</b> Whitman Road, E3 4RB	N/A	No	Voluntary 4-11	30	
29.	<b>Hague</b> Wilmot Street, E2 0BP	6	Yes	Community 3-11	30	#
30.	<b>Halley</b> Halley Street, E14 7SS	1	Yes	Community 3-11	30	
31.	<b>Harbinger</b> Cahir Street, E14 3QP	4	Yes	Community 3-11	45	
32.	<b>Harry Gosling</b> Fairclough Street, E1 1NT	5	Yes	Community 3-11	60	
33.	<b>Harry Roberts</b> Commodore Street, E1 4PF	6	Yes	Nursery 3-5	N/A	
34.	<b>Hermitage</b> Vaughan Way, E1W 2PT	5	Yes	Community 3-11	45	
35.	<b>John Scurr</b> Cephas Street, E1 4AX	1	Yes	Community 3-11	60	
36.	<b>Kobi Nazrul</b> Settles Street, E1 1JP	6	Yes	Community 3-11	30	
37.	<b>Lansbury Lawrence</b> Cordelia Street, E14 6DZ	3	Yes	Community 3-11	60	
38.	<b>Lawdale</b> Mansford Street, E2 6LS	6	N/A	Community 7-11	N/A	
39.	<b>Malmesbury</b> Coborn Street, E3 2AB	2	Yes	Community 3-11	75	
40.	<b>Manorfield</b> Wyvis Street, E14 6QD	3	Yes	Community 3-11	90	

No	Nursery and Primary Schools	Catchment Area	Nursery Class/ Early Years Unit	Type of School and Age Range	Number of places (Published Admission Number)	
41.	<b>Marion Richardson</b> Senrab Street, E1 0QF	1	Yes	Community 3-11	60	
42.	<b>Marner</b> Devas Street, E3 3LL	3	Yes	Community 3-11	90	
43.	<b>Mayflower</b> Upper North Street, E14 6DU	3	Yes	Community 3-11	45	
44.	<b>Mowlem</b> Mowlem Street, E2 9HE	6	Yes	Community 3-11	30	
45.	<b>Old Church</b> Walter Terrace, E1 0RJ	1	Yes	Nursery 3-5	N/A	
46.	<b>Old Ford</b> Wrights Road, E3 5LD	2	Yes	Academy 3-11	90	
47.	<b>Old Palace</b> St Leonards Street, E3 3BT	2	No	Community 4-11	60	
48.	<b>Olga</b> Lanfranc Road, E3 5DN	2	Yes	Community 3-11	90	
49.	<b>Osmani</b> Vallance Road, E1 5AD	6	Yes	Community 3-11	60	
50.	<b>Our Lady &amp; St Joseph</b> Wades Place, E14 0DE	N/A	Yes	Voluntary 3-11	60	
51.	<b>Rachel Keeling</b> Morpeth Street, E2 0PS	1	Yes	Nursery 3-5	N/A	
52.	<b>Redlands</b> Redman's Road, E1 3AQ	1	Yes	Community 3-11	60	
53.	<b>Seven Mills</b> Malabar Street, E14 8LY	4	Yes	Community 3-11	30	
54.	<b>Shapla</b> Wellclose Square, E1 8HY	5	Yes	Community 3-11	30	

No	Nursery and Primary Schools	Catchment Area	Nursery Class/ Early Years Unit	Type of School and Age Range	Number of places (Published Admission Number)	
55.	<b>Sir William Burrough</b> Salmon Lane, E14 7PQ	N/A	Yes	Academy 3-11	45	
56.	<b>Smithy Street</b> Smithy Street, E1 3BW	1	Yes	Community 3-11	60	
57.	<b>St Agnes RC</b> Rainhill Way, E3 3ER	N/A	Yes	Voluntary 3-11	30	
58.	<b>St Anne's RC</b> Underwood Road, E1 5AW	N/A	Yes	Voluntary 3-11	45	
59.	<b>St Edmund's RC</b> Westferry Road, E14 3RS	N/A	Yes	Voluntary 3-11	30	
60.	<b>St Elizabeth's RC</b> Bonner Road, E2 9JY	N/A	Yes	Voluntary 3-11	60	
61.	<b>St John's CE</b> Peel Grove, E2 9LR	N/A	Yes	Voluntary 3-11	30	
62.	<b>St Luke's CE</b> Saunder Ness Road, E14 3EB	N/A	Yes	Voluntary 3-11	60	
63.	<b>St Mary &amp; St Michael RC</b> Commercial Road, E1 0BD	N/A	Yes	Voluntary 3-11	60	
64.	<b>St Matthias CE</b> Bacon Street, E2 6DY	N/A	Yes	Voluntary 3-11	30	
65.	<b>St Paul's CE</b> Wellclose Square, E1 8HY	N/A	Yes	Voluntary 3-11	30	
66.	<b>St Paul's Way Foundation</b> Wallwood Street, E14 7BW	N/A	No	Foundation Trust 4- 18	60	
67.	<b>St Paul's With St Luke's CE</b> Leopold Street, E3 4LA	N/A	Yes	Voluntary 3-11	30	

No	Nursery and Primary Schools	Catchment Area	Nursery Class/ Early Years Unit	Type of School and Age Range	Number of places (Published Admission Number)	
68.	<b>St Peter's (London Docks) CE</b> Garnet Street, E1W 3QT	N/A	Yes	Voluntary 3-11	30	
69.	<b>St Saviours CE</b> Chrisp Street, E14 6BB	N/A	Yes	Voluntary 3-11	30	
70.	<b>Solebay</b> Solebay Street, E1 4PW	1	No	Academy 4-11	50	
71.	<b>Stebon</b> Wallwood Street, E14 7AD	3	Yes	Community 3-11	90 (from Sept 2016)	
72.	<b>Stepney Greencoat CE</b> Norbiton Road, E14 7TF	N/A	No	Voluntary 4-11	30	
73.	<b>Stewart Headlam</b> Tapp Street, E1 5RE	6	Yes	Community 3-11	60	
74.	<b>The Clara Grant</b> Knapp Road, E3 4BU	3	Yes	Community 3-11	60	
75.	<b>Thomas Buxton</b> Buxton Street, E1 5AR	6	Yes	Community 3-11	60	
76.	<b>Virginia</b> Virginia Road, E2 7NQ	6	Yes	Community 3-11	30	
77.	<b>Wellington</b> Wellington Way, E3 4NE	2	Yes	Community 3-11	60	
78.	<b>William Davis</b> Cheshire Street, E2 6EU	6	Yes	Community 3-11	30	
79.	<b>Woolmore</b> Woolmore Street, E14 0EW	3	Yes	Community 3-11	90 (from Jan 2016)	

# These schools have places reserved for hearing impaired children or those with speech and language SEN

No.	Secondary Schools	Address	Post code	Type of School and Age Range	No. of Places (Published Admission Number)	
1.	Bethnal Green Academy	Gosset Street	E2 6NW	Academy 11 - 19	180	
2.	Bishop Challoner Boys	Hardinge Street	E1 0AB	Voluntary Aided 11- 18	120	
3.	Bishop Challoner Girls	Hardinge Street	E1 0AB	Voluntary Aided 11 - 18	150	
4.	Bow School	Gillender Street	E3 2QD	Community 11 - 19	270	
5.	Canary Wharf College 3	Saunders Ness Road	E14 3EB	Free School 11 - 19	40	
6.	Central Foundation Girls	Harley Grove Campus	E3 2AR	Voluntary Aided 11 -19	240	
7.	George Green's	Manchester Road	E14 3DW	Voluntary Controlled 11-19	210	
8.	Langdon Park	Byron Street	E14 0RZ	Community 11 - 19	180	
9.	London Enterprise Academy	Commercial Road	E1 1LA	Free School 11 - 16	120	
10.	Morpeth School	Portman Place	E2 0PX	Community 11 - 19	240	
11.	Mulberry School for Girls	Richard St,	E1 2JP	Community 11-19	210	
12.	Oaklands	Old Bethnal Green Road	E2 6PR	Community	120	
13.	Raine's Foundation	Approach Road	E2 9LY	Voluntary Aided	150	
14.	Sir John Cass's Foundation	Stepney Way	E1 0RH	Voluntary Aided	210 (Subject to consultation)	
15.	St Paul's Way Trust	St Paul's Way	E3 4FT	Trust	240	#
16.	Stepney Green	Ben Jonson Road	E1 4SD	Community	180	
17.	Swanlea	Brady Street	E1 5DJ	Community	210	
18.	Wapping High School	Commercial Road	E1 2DA	Free School	84	

# These schools have places reserved for hearing impaired children or those with speech and language SEN

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## School admission arrangements 2017/18 – Public Consultation response

### 1.0 Introduction

The Authority consults on its school admissions arrangements annually, to ensure that school place allocations continue to be fair, transparent and that as many parents as possible can obtain a place for their child at one of their preferred schools.

This year's consultation included a proposal on a change to the form of testing for pupil ability banding, used as part of the oversubscription criteria for admission to secondary school in Year 7. The banding test is taken in the summer of year 5 and the local authority consulted on whether or not to continue with pupil ability banding for the 2017/18 school year onwards. The Consultation also encompassed the following:

- (A) Proposed admissions arrangements for Tower Hamlets community schools:
- Nursery School/Class
  - Primary Schools
  - Secondary Schools – including the change to testing for pupil ability banding;
- (B) Proposed planned admission numbers for schools in Tower Hamlets;
- (C) Proposed schemes for the co-ordination of admissions for:
- Reception Year of Primary School;
  - Year 7 of Secondary School;
  - Admissions outside of the normal points of entry ('In Year' admission)

The consultation period ran for six weeks from 19<sup>th</sup> November 2015 until 31<sup>st</sup> December 2015.

### 2.0 Communication

The table below includes the communication methods used to advertise and promote the consultation and its reach.

**Table A – communications medium used for consulting on the school admissions arrangements**

Communication medium	Communication reach	Date actioned
Email to all governors via Governor Services with information on consultation opportunity	All governors	November 2015
Email to all neighbouring local authorities seeking their views	All neighbouring local authorities	November 2015
Link on Tower Hamlets council website and intra-net to online consultation questionnaire to obtain wider	All local residents and businesses and staff employed by the council	November 2015

reach		
East End Life Newspaper entry and one paid advert placed at different intervals to allow maximum publicity	Local residents and businesses	November and December 2015
Press release to the local and BME press	Wider community reach including hard to reach communities	November 2015
Head Teachers Bulletin and Primary and Secondary Heads Consultative	All head teachers employed by the local authority	December 2015
Members bulletin and briefing note for Lead Member for Children's Services	All elected members asking for support to engage the local community	November 2015
Admissions Forum	Members of the Forum	December 2015
Public meeting	All members of the public	December 2015
Somali Governors	Targeted group	November 2015
New Residents and Refugee Forum	Frontline professionals working with vulnerable hard to reach children and families	December 2015
Parent Champions	Consultation with Parent Champions to reach parents	December 2015
Councils social media accounts, scheduled release on Facebook and Tweeter	Wider reach	November and December 2015
Partnership Boards including: <ul style="list-style-type: none"> <li>• Children and Families Partnership Board</li> <li>• Young People and Preparing for Adulthood CDG</li> <li>• Maternity, Early Years and Childhood</li> </ul>	Wider partnership reach	November/December 2015

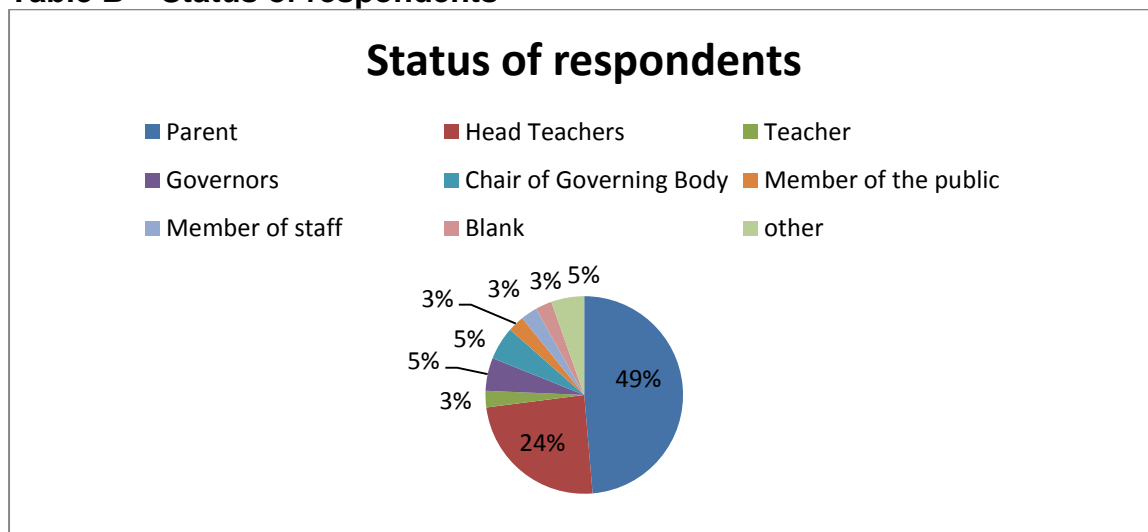


## 2.0 Profile of respondents who submitted an online response

This information does not include the profile information for those who attended the parent’s focus group; this is only for those who completed an online response.

### 3.1 Profile of respondents

**Table B – Status of respondents**



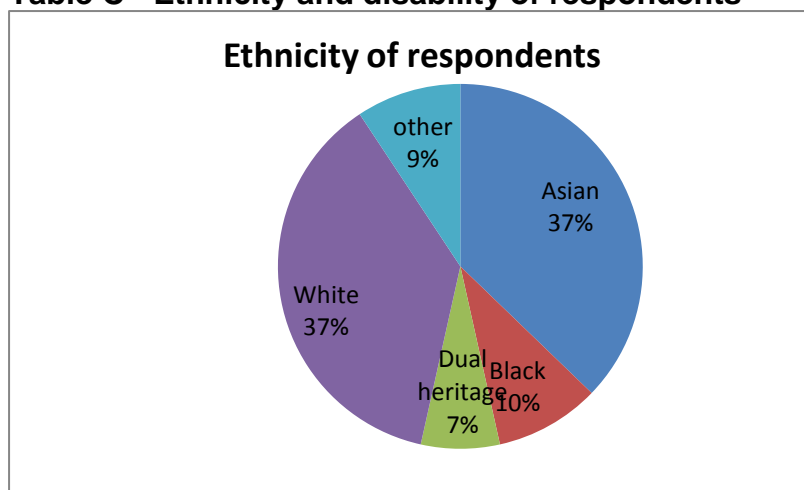
This year we have had a wider reach with more parents engaging in the consultation than in previous years.

### 3.2 Schools input

Local schools took part in the consultation, these were: Sir William Burrough, English Martyrs Catholic Primary School, Stebon and Osmani Primary School, Morpeth School, George Green's School, Arnhem Wharf School, Stepney Green Maths, Computing & Science College, Stepney Green School.

### 3.3 Ethnicity and disability of respondents

**Table C - Ethnicity and disability of respondents**



The respondents engaged include representation from a range of community groups the White and Bangladeshi representing the largest groups.

Other community groups engaged included: African, Somalian, Caribbean, French, Spanish, Polish and Australian, reflecting the changing diversity of the local population.

33 respondents said they were not disabled and 2 responded with yes. They did not raise any issues in relation to their disability and securing a school place.

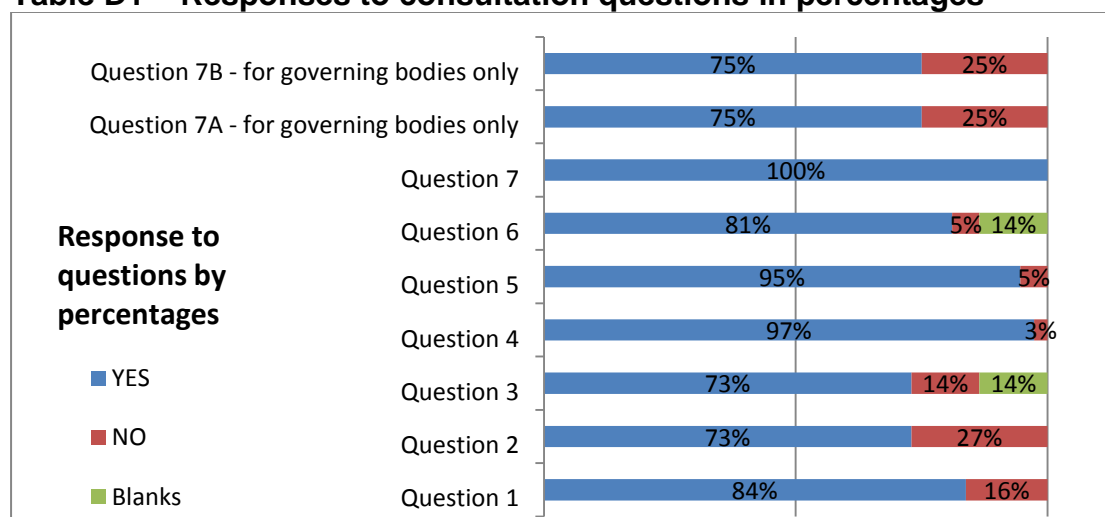
#### 4.0 Results analysis

There were 37 responses to the questionnaire, in the main these were completed through online submission, 9 were completed at an open public event. There is general consensus and agreement with the proposed changes and respondents were generally positive about ensuring a fair and accessible system of school place allocation. Pupil ability banding is supported by 73%, of the 14% who said ‘no’, one suggested the introduction of a lottery system for allocation.

There was a collective response from the Tower Hamlets Admissions Forum who supports the proposed arrangements. Primary and secondary school head teachers were consulted where there was consensus and support for the arrangements proposed, including support for pupil ability banding. Additionally, the parents and carers engaged in the consultation, made comments through a facilitated focus group. The feedback was in the main positive. All the parents agreed with pupil ability banding. We also received some comments from front line professionals working with hard to reach children and families which suggested improvements around wider knowledge and awareness of the points of access to get support for applying for a school place. These are further detailed in section 6.

#### 4.1 Analysis of online results

**Table D1 – Responses to consultation questions in percentages**



**Table D2 – Responses to consultation questions in numbers**

Question	YES	NO	Blanks
1. Do you agree with the proposed arrangements for admission to Tower Hamlets nursery schools and classes in 2017/18?	31	6	0

2. Do you agree with the proposed arrangements and oversubscription criteria for admission to community primary schools?	27	10	0
3. Do you agree with the proposal to continue the use of pupil ability banding and therefore the introduction of an alternative banding test for admission to Secondary School in Year 7?	27	5	5
4. Do you agree with the proposed arrangements and oversubscription criteria for admission to community secondary schools in 2017/18?	36	1	0
5. Do you agree with the proposed scheme for co-ordinating year 7 and reception year admissions?	35	2	0
6. Do you agree with the proposed scheme for co-ordinating in year admissions?	30	2	5
7. Do you agree with the planned admission numbers for Tower Hamlets schools for 2017/18?	37	0	0
<b>The questions below are for governing bodies only:</b>			
7a. Do you agree with the PAN for your school?	3	1	0
7b. Do you agree with the PAN for those schools whose admissions impact on your own school?	3	1	0

The tables above demonstrate a positive response to the proposed arrangements. For all the key questions (excluding questions for governing bodies where there were only 4 responses) the majority of respondents agree with the proposals and some positive comments were received. Question 2 which sought views on the arrangements and oversubscription criteria for admission to primary school received a slightly higher percentage of people disagreeing at 27%, the reasons given were varied and generally point to disagreement with the oversubscription criteria –the comments in relation to this are further detailed in section 5.

### **5. Analysis of comments from the online questionnaire**

<b>Question one:</b> proposed arrangements for admission to Tower Hamlets nursery schools and classes	
<b>Respondent</b>	<b>Comments</b>
Parent	<p>'This is to ensure consistency in the way places are offered and, where possible, that children attend the same school for their nursery and primary education'</p> <p>I wholeheartedly support that statement and TRULY REGRET that it was not the policy in force when my child started nursery in 2013, she didn't get a place in reception in any of the 6 schools in her application leading to the horrendous appeal process, always a disappointment and a massive waste of energy for parents. So hopefully the new policy will save young children the trouble to start all over again in another school and the parents the hassle of going through useless appeal procedure and travelling to new school, building new relationship with another school, getting new uniforms.</p>
Parent	<p>Siblings should get priority to keep families together</p> <p>Parents who are studying should get priority over Looked After</p>

	Children
Parent	siblings should get priority to keep families together Parents who are studying should get priority over Looked After Children
Parent	Families which have both parents that work full-time by default should be offered full -time places for their child regardless as it is impossible to make alternative arrangements and obtain approval from work for part-time places, and especially where families like myself have no additional support from extended families. The oversubscription criteria should take this into consideration.  2) Section 6 over-subscription criteria - more detail needs to be provided as to what is meant by 'social reason' for priority 2.
Chair of Governors	We think that the current arrangements are working well.
Governor	I would like the council to initiate a serious consultation on the use of a lottery system for allocating oversubscribed places. This would be much more in line with Tower Hamlet's commitment to equality fairness, because it would prevent people buying their way into the best schools by purchasing property nearby.
Other (Stebon)	Is it possible for Pupil Services to coordinate the Nursery Admissions, instead of each individual school or setting? It would be better for someone independent to have an overall view of which families are more likely to get into specific Reception classes the following year, based on their current addresses and to advise families - also to avoid families from accepting several different places at once, in order to keep options open until the last minute.
Head teacher	The arrangements did not work for us. Parents are still registering up until July. We take referrals from social services etc. Not one child on the list from TH took up a place. The way we offer places is fair and transparent

#### Local authority response

Children's Services places a strong focus on families and any policies we have in place are not intended to separate children when entering school. However there is extensive demand for school places in Tower Hamlets and this can happen in the context of operating a fair and transparent system which prioritises vulnerable families. The local authority continues to work with parents who wish to remain on a waiting list for a school place. We cannot however give priority to siblings over Looked After Children. The school admissions code issued under Section 84 of the School Standards and Framework Act 1998 requires that local authorities must have in place an agreed oversubscription criteria and that Looked After Children and those previously looked after are given priority. The Code then requires local authorities to apply the oversubscription criteria to all other applicants using the agreed and published oversubscription criteria. The legal framework therefore, does not allow the prioritisation of siblings over and above that given to Looked After Children who receive top priority.

Working parents and those that are studying are given priority for full or [part-time allocation under priority 4. Priority 1 is required by the School Admissions Code as detailed above and priority 2 is to safeguard and protect vulnerable children and

support vulnerable families – this is within the legal framework and the strategic aims of the Council. We propose priority 4 for working and studying parents in recognition of the additional demands placed on parents who work or are studying.

There is demand for school places in Tower Hamlets and local stakeholders agree that ability banding is the fairest way of allocating school places for both the school and pupils. A lottery system can mean that pupils are placed far from home losing their right to a local place, this can have a negative impact on community cohesion and perpetuate social inequality because there is no balance of pupil ability reflected in the performance of the school and the impact this has on house prices.

Nursery admission is undertaken directly with nursery places. Reception place allocation which is administered by the local authority is a deliberately separated process from the allocation of school place at any other stages – a new application will have to be made in all cases so that all parents are given the choice and opportunity to apply and be considered. The administration of nursery admission is not a statutory requirement; however, the local authority will consult on this when the school admissions arrangements are next consulted on.

The local authority is working with the school where there are issues with places not being taken up.

**Question two:** proposed arrangements and oversubscription criteria for admission to community primary schools

Respondent	Comments
Member of the public	This policy does not mention that priority is given to children out of school during the year above children who are waiting for a place in a school where they have a sibling but are presently in another school. This is wrong as it creates too much strain on families trying to get siblings to different schools. Priority should be given to children to move schools above those with no school place as ultimately the child who is waiting for a place in the same school as its sibling is will not be taking an additional space only creating one in a different school, which can then be filled by a child without a school place, assuming no other child is waiting for a place with a sibling in that school. That way more children will be placed together relieving the pressure on families, the school in looking after the child at the end of the day, reduce lateness, and reduce transport costs. As the number of spaces in the borough ultimately remains the same, just as many children who are without a school place will be placed in a school, the only overall difference being that many children will be placed in the same school as their siblings. Please take this into account when you are determining your admissions policy. It does not mention any of this in the policy.
Parent	Some applicants outside the catchment area live closer to the school applied for than other applicants who live within the catchment area, in this case priority should be given to the applicant living closer to school even if they don't live in the catchment area. The catchment area should be defined in concentric circle rather than using the ward map, it just doesn't make sense, what matters

	is not the ward boundaries but how far a child has to walk from home to school twice a day.
Parent	Tie-breaker should apply to all oversubscription categories, not just 3-6. While categories 1-2 are unlikely to need such tie-breaker, it would make the design of the system even more robust.
Parent	However, I am concerned as we were informed recently that there are already waiting lists for certain school places in Bow area
Parent	<p>Children who have both parents who work full-time and live within the catchment area but who have no other sibling attending the school (as in first child) should be given priority for a place, and in particular a full-time place, especially where there is only one school in the catchment area who caters for full-time working parents in terms of after school club.</p> <p>I live in poplar area near Langdon park DLR and within my catchment area there is only one school (Bygrove Primary School) which is suitable for me to apply to for my son, who is my only child. it has a breakfast club, but more importantly 2 back-to-back after school clubs from 3.30pm-4.30pm and then 4.30pm-5.30pm which means it finishes at 5.30pm and I can collect him after work. I no other schools in my catchment area has that provision, why should I be disadvantaged as a result of the way the oversubscription criteria is defined and no importance is placed for households with both working parents who are in need of more than one after school club, but only 1 school in catchment area which caters for our needs. If this is oversubscribed, this means my son will have no school place allocated to him at all as that will be the only choice for him due to the after school clubs.</p> <p>In line with this review of the admissions policy, I think there is also a need in parallel to this to ensure the local authority makes it compulsory for schools to offer more than one consecutive afterschool club for those working parents, otherwise it is unfair to impose this admissions policy on us without requesting schools to implement changes as well for working parents. It's unfair on parents who will be left without a school place.</p>
Parent	I would like to choose which school my children get into, this should not be the closest
Chair of Governors	We think that the current arrangements are working well
Governor	I would like the council to initiate a serious consultation on the use of a lottery system for allocating oversubscribed places. This would be much more in line with Tower Hamlet's commitment to equality fairness, because it would prevent people buying their way into the best schools by purchasing property nearby.

<b>Local authority response</b>
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<p>Prioritising children who want to move to another school above those with no school places – those who do have a school place through the normal points of entry are considered through the In-Year admissions policy. We view the priority of placing children who do not have a school place as part of our safeguarding ethos</p>
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and continue to support children into a school place as quickly as possible.

The catchment areas were consulted on last year and agreed by all stakeholders including parents with children in local schools. The local authority continues to plan the provision of school places and as the borough develops and changes through regeneration there will be a need to reconsider the catchment areas. We will consider this as an option when the school admissions arrangements are next consulted on.

The local authority has to create a balanced and fair system which offers local places for local children, we must enable siblings to attend the same school as far as possible – this is why the catchment area cannot have priority over sibling criteria.

Tie-breaker criteria - we would not apply the criteria to categories 1 and 2 as vulnerable children would have priority under the School Admissions Code for a school place.

**Question three and four:** Proposal to continue the use of pupil ability banding and the proposed arrangements and oversubscription criteria for admission to community secondary schools

Respondent	Comments
Parent	Error in the proposed maps for the priority area
Governor	I would like the council to initiate a serious consultation on the use of a lottery system for allocating oversubscribed places. This would be much more in line with Tower Hamlet's commitment to equality fairness, because it would prevent people buying their way into the best schools by purchasing property nearby.

Local authority response

See response in question 1

**Question five, six – no comments received**

**Question seven, seven a-b: Planned admission numbers for Tower Hamlets schools**

Respondent	Comments
Head teacher	Can Canary Wharf College 3 offer a secondary curriculum with an intake of just 40? Does the Solebay school have sufficient play space for an intake of 50?
Parent	These numbers should take into consideration the demand for school places
Parent	Just hope it is enough. It will be easier to see these numbers put against number of children living within catchment area
Chair of Governors	We do not believe that there is currently a 'natural cohort' of 90 applicants for places at Arnhem Wharf school. We currently have 16 places available in our reception cohort. Although we have only a few vacancies in our year 1 and year 2 cohorts, these year groups face significant mobility (e.g. in year 2 we have had 9 new

	admissions since September) based on never having had full cohorts.
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**Local authority response**

Planned admission numbers (PAN) are based on the number of school places and capacity at a school. The intention through the consultation is to identify where there is demand, however the planned numbers are also limited by the availability of space and numbers must be planned to recognise that there is demand for school provision in the borough. The planned numbers are a part of how we manage the provision of school place provision; given the demand for school provision we cannot reduce the PAN. The local authority will continue dialogue with schools where there may be local factors impacting on take-up.



## **6. Additional representation**

Additional representation was received and these are detailed below:

<b>Organisation</b>	<b>Point for consideration</b>
<b>Hestia</b>	Children in families fleeing domestic violence should be given top priority under the school admission criteria and be given the same status as looked after children.
<p><b>Local authority response:</b>            This position was considered by the local authority and evidence does not suggest that children in families fleeing domestic violence are difficult to place in Tower Hamlets and to label them as such could be discriminatory and adversely affect a child. The safeguarding and wellbeing of vulnerable children is a key priority for the borough, these children would still receive the highest priority as they would be prioritised under priority 2, priority 1 being required by law for prioritisation of Children Looked After.</p> <p>The school admissions code issued under Section 84 of the School Standards and Framework Act 1998 requires that local authorities must have in place an agreed oversubscription criteria and that Looked After Children and those previously Looked After are given priority. The Code then requires local authorities to apply the oversubscription criteria to all other applicants using the agreed and published oversubscription criteria. The legal framework therefore, does not allow the prioritisation of children in families fleeing domestic violence over and above that given to Looked After Children who receive top priority.</p>	
<b>New Residents and Refugee Forum</b>	Frontline professionals highlighted a very positive experience and one negative experience. The positive case highlighted how well the arrangements work for getting a child into school quickly through In-Year admissions and the high level of support received. The negative experience indicated that there needs to be more information available at public venues about school admissions to enable residents to quickly make contact with the service and obtain the correct advice.
<p><b>Local authority response:</b>            The local authority will consider and improve the pathways for new residents to obtain advice and access to services to secure a school place for vulnerable children.</p>	
<b>Parent Champions</b>	<p>A focus group with local parents in the borough highlighted the following points:</p> <ul style="list-style-type: none"> <li>• The majority of parents were in the main supportive of the arrangements in place and feel that it is a fair system;</li> <li>• Children securing school places within 10 days is very positive;</li> <li>• It is positive that the system allows parents the choice to defer entry to reception;</li> <li>• Safeguarding element of the In-Year admission is a positive arrangement;</li> <li>• The local authority deciding rather than the school is fair for all;</li> <li>• Parents were very supportive of pupil ability banding;</li> </ul>

	<p>The reasons parents gave for disagreeing:</p> <ul style="list-style-type: none"> <li>• There were times when parents tried to understand the decision making criteria and felt that the reasons why a decisions was made was always explained from a policy perspective but this needed to be broken down further and put into context for parents who ring the service because they are unhappy with the outcome or want to understand the decision;</li> <li>• There were some shared experiences of the difficulties of having siblings who are placed in different schools, this was also highlighted as an additional challenge for working parents or parents who are studying, parents suggest that the oversubscription criteria give top priority to children whose parents are working/ and or studying;</li> <li>• If children are in nursery, they should not have to apply for a reception place but be given priority to the linked reception school;</li> <li>• The catchment areas are not fair and can create division between communities;</li> <li>• When new homes are built, consideration needs to be given to ensure school places are available;</li> <li>• St Pauls Way School has allocated places for children with speech and language needs and hearing impaired children - more schools should do the same;</li> </ul> <p>The parents who attended broadly reflected the diversity of the borough and welcomed the opportunity and space for a discussion on school admissions arrangements.</p>
<p><b>Local authority response:</b></p> <p>The admissions arrangements are technical in nature and we will consider ways in which information can be presented to make it easier to understand including verbal dialogue to improve the customer experience.</p> <p>The school admissions code issued under Section 84 of the School Standards and Framework Act 1998 requires that local authorities must have in place an agreed oversubscription criteria and that Looked After Children and those previously Looked After are given priority. The Code then requires local authorities to apply the oversubscription criteria to all other applicants using the agreed and published oversubscription criteria. The legal framework therefore, does not allow the prioritisation of children whose parents are working and/or studying. Further, Section 1, 1.9 (f) makes clear that whilst the local authority can agree its own admissions arrangements it must not give priority to children according to the occupational, marital, financial or educational status of parents applying.</p> <p>The primary arrangements had the highest level of disagreement from parents and the reasons given were essentially because they did not agree that a new application had to be made for admission to the reception year. The local authority maintains that all applicants should be given the opportunity to secure a local place and to do this all applicants have to be co-ordinated and considered on the same criteria. Automatically accepting those in nursery settings for a reception place</p>	

excludes those who would not have taken-up nursery provision.

Tower Hamlets is a borough of growth, as part of the planning of school provision new and planned developments are considered. We have previously consulted on catchment areas to reflect this and will consider consulting on this in the future.

St Pauls Way School is a school which has designated specialist provision, providing specialist provision within a mainstream setting. We currently have a number of other schools with specialist provision including Globe Primary, Hague Primary, Cyril Jackson and Culloden School. The local authority supports inclusive settings; however this cannot be at every school as there are resource and feasibility considerations. They are planned on a geographical basis to maximise its use and to make the provision financially viable. We also know that it can difficult to find specialist, qualified and experienced staff to teach at these specialist provisions.

**Tower Hamlets Admissions Forum**

The Forum is supportive of banding in Tower Hamlets and this must be maintained at banding at a local level so that all schools receive a balanced intake, this must not be at a national level which looks at the ability of pupils nationally.

There should be clarity about the arrangements for obtaining school places in an academy when a school is converted.

**Local authority response:**

The School Admissions Code permits the use of banding as a form of selection at three levels: a) the full range of ability of applicants for the school(s); b) the range of ability of children in the local area; or c) the national ability range. We are not proposing to change the level at which banding is administered, this will remain at a local level.

The local authority is currently considering the formation of a schools partnership trust, this will be a legal body responsible for a range of education related functions and will consider the arrangements for school admissions for local academies. The school admission policy will be revised to reflect any change to arrangements is this arises. There are already own admission authorities which have agreed to adopt the local authority's school admissions policy.

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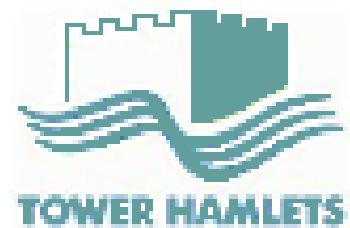
# TOWER HAMLETS COUNCIL EQUALITY IMPACT ASSESSMENT SCHOOL ADMISSION ARRANGEMENTS 2015



**Version:** 1.0

**Date issued:** January 2015

**Prepared by:** Pupil Services  
Education Social Care and  
Wellbeing Directorate



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## Equality Analysis (EA)

### Section 1 – General Information (Aims and Objectives)

Name of the proposal including aims, objectives and purpose:

#### School Admissions in Tower Hamlets

Admissions to schools are functions that operate within a policy framework. There are arrangements and policies for the admission of pupils to nursery, primary and secondary mainstream schools. By law all schools must have admission policies that are published and made available to parents. In Tower Hamlets (TH), the Local Authority is the admission authority for community schools and the governing bodies are the admission authorities for own admission authority schools i.e. Voluntary Aided, Trust, Academy and Free Schools.

Applications made outside of the September entry point, are referred to in this report as 'in-year' admissions. These are coordinated centrally on a half termly basis and follow the respective primary or secondary admissions arrangements. Applications from pupils who are 'out of school' are processed outside of the above timetable and are allocated a place within ten school days.

Admission authorities must consult on their admission arrangements in accordance with a statutory timetable, publish information for parents including the procedure and timetable; the oversubscription criteria; the number of places available at each school and the number of applications refused; arrangements for informing parents of the outcome of their applications; and details of how to access further information. The local authority must also consult upon and implement co-ordinated schemes for admissions to the reception year group and secondary transfer.

Nursery Admissions Arrangements came into effect in September 2014. Whilst, the policy is in line with the primary coordinated admissions arrangements for reception class, the Authority does not coordinate the nursery admissions centrally and schools administer the admissions individually. Parents apply directly to their preferred school(s); schools will then notify the outcome to parents. There is a standard closing date and offer date for TH schools and nurseries. The Authority will collect the outcome data from schools once the offers have been made. This data collection will be used in future years to monitor the decision-making for nursery admissions.

Primary co-ordinated admissions to the reception year group have operated since the 2006/7 academic year. This is a statutory scheme with the aim of notifying every parent applying to a Tower Hamlets primary school on the same day of a single offer, if possible, at the school ranked highest that is able to offer a place. The decisions are taken by governors in respect of own admission authority schools and community schools apply the Council's over-subscription criteria. Co-ordinated admissions allow the Local Authority (LA) to monitor the decision-making in respect of community schools.

Applications for secondary transfer are dealt with and determined by the LA, except for those to the Bishop Challoner Collegiate schools, Raine's Foundation, Sir John Cass Foundation, Wapping High School, London Enterprise Academy and Canary Wharf College. There are co-ordinated admission arrangements for secondary schools; with the LA working closely with own admission authority schools.

All schools must, by law, have oversubscription (admission) criteria, which are used to determine the offer of places if a school receives more applications than there are places available. The criteria must be compatible with equal opportunities legislation, have regard to the Authority's responsibility to promote racial equality and as far as possible be inclusive of all the elements of the school's local community. There is also a requirement for the criteria to be clear, fair and objective. For the secondary schools that use the LA's admission policy, banding is used to achieve a balance of ability in the intake.

The relevant legislation for the admissions criteria is the School Admissions Code 2014 issued under the School Standards and Framework Act 1998 ('SSFA 1998'), the Equality Act 2010 and the Human Rights Act 2008.

Admission authorities have a duty to comply with parental preference whenever practicable. The effect is that no influence can be brought to bear on admissions to under-subscribed schools as all the applications will be successful. This can result in schools where there is little diversity of intake in terms of ethnicity and significant gender imbalance. A relevant factor in Tower Hamlets in this respect is that single sex education is more popular for girls than for boys.

Own admission authority schools have their own admission policies. Generally speaking, they give priority on a denominational basis, although many Church of England schools have "open" places for children from other world faiths. Where priority for admission is based on denominational grounds and the school is oversubscribed, the admission of pupils from other world faiths may be limited. Whilst the pupil profile in these schools is diverse, in some of the Voluntary Aided (VA) schools Bangladeshi children are significantly underrepresented. In many cases, these schools receive few applications from Bangladeshi parents.

There are also schools with very few non-Bangladeshi pupils. The principle that underpins the Council's admission policy is proximity to school and the location of some schools combined with the local demography can sometimes result in a monocultural intake.

The policies being considered under this Equalities Analysis set out the processes and criteria for admitting children to community schools and how Tower Hamlets Council coordinates admission applications within the Pan London area. In accordance with the School Admissions Code, these policies include processes and criteria that are fair, objective and transparent.

The following policies are contained within the remit of this Equalities Analysis.

- Nursery Admissions arrangements
- Primary School Admissions arrangements
- Secondary School Admissions arrangements
- In-Year Admissions arrangements

### Who is expected to benefit from the proposal?

The Council seeks to use objective admission criteria which maximises equal opportunity and equitable access to education, in order to create community schools with balanced intakes, in terms of ability, gender, ethnicity and socio-economic factors. The following groups are expected to benefit:

**Parents** – the policies and procedures need to be clear for parents to understand how to apply



for a school place and how school places are allocated by the admissions authority.

**Children** – All children receive an offer of a school place at the earliest opportunity and normally at one of their local schools.

**Schools** - Schools will have a clear policy within which to exercise their responsibilities for admissions.

**Local Authority** - A clear policy against which to make decisions, co-ordinate offers of places and monitor pupil admissions.

**Service area:**

Learning and Achievement

**Team name:**

Pupil Services

**Service manager:**

Terry Bryan

**Name and role of the officer completing the EA:**

Terry Bryan, Head of Pupil Services

What initial evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

Data and information has been collected from the following data and reports:

- 2011 National Census
- School Census collections (various years)
- Analysis of admissions outcomes (various years)
- Central Pupil Database
- Consultation outcomes (various)
- Transport administration system
- Equality Impact Assessment Bow School (2013)
- Mode of travel survey (2011)

### Tower Hamlets Resident Profile

The residential profile in Tower Hamlets is set out in Appendix A. Data from the 2011 National Census shows Tower Hamlets is a diverse borough from many different ethnic backgrounds. However, it is clear that two groups are prominent in the borough. This is shown in Appendix A, Table 2.1. 32.8% of residents are of white origin and 32% are of Bangladeshi origin. The remaining 35.2% are made up of all other groups.

### Key Findings:

#### Nursery arrangements

The recent consultation on the admissions arrangements for 2016/17 (Appendix B) showed that all respondents agreed with the nursery admissions arrangements following that of the primary school admissions arrangements. This included implementing the same catchment areas and 'nearest school' tie-break criterion in line with the admissions arrangements for primary schools.

The outcome for nursery admissions is not yet available for monitoring. Whilst the Authority does not centrally administer the nursery arrangements, the Authority will oversee the process and review the outcomes to ensure that all schools are consistent when decision-making for school places and full and part-time places.

#### Primary Arrangements

Before the introduction of catchment areas, priority was given to pupils living closest to the school by shortest walking distance. The introduction of catchment areas in 2013/14 gave priority to pupils living within the catchment area of the school over those living outside the catchment area. This is demonstrated by a significant reduction in the number of 'allocated'<sup>1</sup> pupils in 2013/14 to only 61 children in 2014/15 school year.

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<sup>1</sup> Allocated – where a child could not be offered a place from any of the family's preferred schools and the LA then allocates a place at the nearest available school.

## Parental Choice

Catchment areas by their nature create boundaries, and due to the geography of the borough and location of the schools, no two areas can claim to be equal in offering parental choice.

Although the catchment areas are designed to accommodate the projected pupil population it is recognised that they could limit choice, especially in areas where there are fewer community schools. The Council successfully consulted on and implemented the proposed changes to two existing catchment areas giving parents in these areas a wider choice of schools over a larger area, thereby increasing families' accessibility to a local community school. This also ensures that families, who are not offered a place at their preferred school(s), also have the opportunity to access an alternative school that is within reasonable walking distance to their home.

The maps in Appendix D show the pattern of applications both before and after the catchment area system was implemented. The maps illustrate the impact of the introduction of catchment areas with the trend showing an increase of pupils getting an offer for a school in their catchment area.

The last two years data shows that the introduction of the catchment areas has had positive outcomes for families and schools. The 2013/14 preference outcomes show that 93.4% of applicants received an offer from one of their top three preferred schools and 83.7% received an offer at their 1<sup>st</sup> preference school. The overall preference success was 95.3% for 2013/14.

In 2014/15 the preference outcomes had further improved. 95.7% of applicants received an offer from one of their top three preferred schools and 85.7% received an offer at their 1<sup>st</sup> preference school. The overall preference success was 97.3% for 2014/15. This is demonstrating that there is a shift in families' applications and more and more children are receiving an offer at a local preferred school.

The success of the catchment area is further demonstrated in Appendix A, Table 3.4. The table illustrates the number of children that are placed at a school outside their Catchment Area. In 2012/13 (before the introduction of catchment areas) a total of 184 children were placed outside of their catchment area. This number was significantly reduced, with the introduction of Catchment Areas and 'nearest school' priority, to 25 children allocated a school place outside of the catchment area. The outcome for 2014/15 really demonstrates the success of the policy as no children were placed outside of their catchment area and were able to access a school from within their catchment area. The increasing percentage of pupils (Appendix D Table 1) that have been offered a school in the same catchment area indicates that the tie break and catchment areas are having the desired effect, giving pupils access to a local school place.

The catchment areas and the 'nearest school' priority continue to ensure that children access a school close to home and this has subsequently reduced the number of families travelling to a school over two miles. The policy is also contributing to the Authorities aim to reduce the travel cost generated through travel assistance, as the number of families requiring travel assistance is lower than previous years. Appendix A, table 3.5 shows the reduction in children on transport over the last three years.

## **Mobility**

Safer walking journeys are promoted by avoiding main roads due to the design of the catchment areas. Appendix C shows a map of the catchment areas alongside the major roads in the borough.

## **Secondary arrangements**

Following the consultation last year, the Authority had considered a request from parents living in the Bow North Area to review the secondary school admissions policy, in light of the concern that there were limited opportunities for families living in Bow to access a local secondary school place. Consideration was given to whether or not there was a need to implement a designated priority admission (catchment) area for Morpeth School or another school in or around the Bow area. Consideration was also given to whether or not the 'nearest school' tie-break criterion should be introduced as part of the admissions arrangements for secondary schools. The detailed analysis included an equalities impact assessment on the effects of the relocation of Bow School and its change of designation from a single sex to a mixed (boys and girls) school.

The analysis showed that children living in the Bow North Area (Appendix A, Table 3.7) were still able to access a nearby school and also that most children living in Bow had secured a place at either Morpeth or Bow school during the last secondary transfer round in 2014. Based on this outcome the Authority had deemed that there was no requirement to introduce a priority area for neither Morpeth School nor a need to introduce the 'nearest school' tie-break for admissions arrangements to secondary schools.

As part of a previous Equality Impact Assessment and the 2013 applications data, had indicated that girls in Bow travelled furthest to access a preferred secondary school. The expansion and change of Bow from a boys' school to a mixed school had increased the secondary provision and equality of choice for parents of girls. Appendix A, Table 2.3c shows that the average distance travelled by residents of Bow and Bromley wards has reduced; this is largely attributed to Bow school becoming a mixed school in September 2014. Other wards in the East and South of the Borough have also seen reductions in the average distances travelled by pupils.

For the purposes of comparison, the new ward boundaries that came into effect in May 2014 have been used for 2013 and 2014 applications.

The expansion of Bow school also addressed the disproportionate impact on the local community in Bow, in particular those from a BAME background. Across Tower Hamlets, 84.6% of BAME pupils were able to get their first choice of school, which equates 2109 to pupils out of 2420. During the 2013/14 academic year, only 65% of BAME pupils living in the Bow area managed to secure their first choice of school, this is has now improved to 86%. As shown in Appendix A, Table 2.4a. This is largely to do with the relocation and re-designation of Bow School.

## Information Gap

The following Data was not available at the time of completing this analysis:

- RSL data – Registered Social Landlords
- Although we were able to get a summary level breakdown of ethnicity in the current housing waiting list, this was not broken down by wards, which would have allowed further analysis as to which areas are likely to see pressures in school places
- Data unavailable on sexual orientation of pupils
- Data unavailable on pupils religious background
- Data unavailable on gender reassignment
- Data unavailable on civil partnership in relations to pupils parents/guardians
- Data unavailable on pregnancy and maternity for active pupils

## Section 3 – Assessing the Impact on the Nine Groups with Protected Characteristics

### Parents/Residents

The profile of Tower Hamlets residents can be found in Appendix A, which is taken from the 2011 National Census.

Based on the 2011 Census data, there are a total of 254,096 people living in Tower Hamlets (aged 0 to 85 and over). The largest group is 'White' accounting for 32.8% (83,269 people). Residents with a Bangladeshi origin account for 32% of the population (81,377). 12.4% (31,550) are from the 'Other White' ethnic groups, which would include people from eastern Europe. The 'Black/African/Caribbean' ethnic group make up 7.3% (18,629) of the population. A complete analysis is included in Appendix A, Table 3.1.

### Pupils

The 2011 National Census offers an insight into the profile of pupils that are due to enter the education system over the next few years. Analysis of the 0 to 4 age bracket shows there are a total of 18,750 people in the borough at that age group. This equates to 7.38% of the total population of Tower Hamlets.

49.5% (9,280 people) of 0 to 4 year olds are from the 'Bangladeshi' ethnic group, followed by 16.8% (3,153 people) from the 'White' ethnic group. Mixed/multiple ethnic groups and Black/African/Caribbean/ Black British ethnic groups make up for 9.9% (1,851 people) and 9.7% (1,823 people), respectively. A complete analysis is included in Appendix A, Table 3.2.

A more detailed profile of the school age population is provided by the most recent pupil census, Spring 2014, which collected ethnicity data and can be found in Appendix A, Table 3.3a.

### Gender

The school population profile using the 2014 spring census, the most recent collection to carry ethnicity data is set out in Appendix A, Table 2.2. There are 36,439 (Nursery to Year 11) pupils in school, 14.32% are from a white background and 62.32% from a Bangladeshi background. In total, there are 18,118 males and 18,321 females from the school population.

### Other Socio economic factors

Approximately 46% of pupils receive 'Free School Meals'.

### Location and types of Primary School in Tower Hamlets

Catchment Area	Academy	Free	Community	Voluntary Aided	Grand Total
Area 1 Stepney	2		10	2	14
Area 2 Bow	1		6	1	8
Area 3 Poplar	2		9	3	14
Area 4 Isle of Dogs	2		4	2	8
Area 5 Wapping			6	4	10
Area 6 BG			11	5	16
<b>Grand Total</b>	<b>7</b>	<b>0</b>	<b>46</b>	<b>17</b>	<b>70</b>

### Types of Secondary School in Tower Hamlets

Gender	Academy	Free	Community/Trust/VC	Voluntary Aided	Grand Total
Girls and Boys	2	2	7	2	13
Girls			1	2	3
Boys			1	1	2
<b>Grand Total</b>	<b>2</b>	<b>2</b>	<b>9</b>	<b>5</b>	<b>18</b>

### Qualitative or Quantitative Data

The following Qualitative data is available:

- Discussion at Admissions Forum (Admissions Forum's minutes)

### Quantitative

- Outcomes of 2013/14 and 2014/15 admissions with Catchment area
- Consultation 2015/16 outcomes
- Consultation 2016/17 outcomes
- School Census (PLASC)
- Admissions statistics on Central Pupil Database
- Mode of Travel Survey
- 2011 National Census
- Housing approvals – LDD extract (March 2014)

Pupil data held on the central pupil database and the data from the termly census enable analysis against the key equality factors.

### Equalities profile of staff

The Pupil Services Team is responsible for delivering the service. Of the 15 staff members, 59% (9 people) are of Bangladeshi origin. 13% (2 people) are Black British, and 24% are from (1 person from each) a White, Pakistani, Vietnamese and Mixed ethnic group. 8 staff members are female and seven are male. The ages range from early 20's to 50's.

### **Barriers faced by service users:**

The service is actively trying to widen its accessibility to its service users by continually reviewing its business practices.

### **Language**

The admission brochures are published in English. They have been produced in other languages in the past. Although the brochures are not currently translated, multilingual staff are on hand to explain and advise where necessary. Where required, additional translators are bought in to advice with specialist languages.

### **Accessing Service**

The service operates from 8.00am to 5.30pm on Monday to Friday. Some working parents, who may be members of the target groups, may have difficulty accessing the service. However, all services are available online, such as brochures, guidance leaflets, admissions forms and a generic mailbox is [school.admissions@towerhamlets.gov.uk](mailto:school.admissions@towerhamlets.gov.uk) advertised in all publications. Pupil Services are also exploring other online methods to further improve accessibility outside of office hours.

During holidays when schools are closed families often move into the area and parents are unable to organise school places for their children during this period. Information and advice is available from Pupil Services, however applications cannot always be fully determined until schools re-open. The parents or children may be members of particular target groups.

The Parents' Advice Centre (PAC) also acts as a point of contact for parents and liaises with Pupil Services; however with this service restricting its support to parents of children with Special Educational Needs, this may limit other parents' accessibility to impartial advice. Pupil Services, in collaboration with Parent and Families Support Service, are exploring other avenues to ensure that parents have access to support and advice throughout the admissions process, from the initial application stage (when making informed choices) to the appeals stage.

### **Publication**

Pupil Services publications are widely available. Key changes and policy awareness is shared through media communications. These are often accompanied by press releases to local community papers, predominantly Bengali language papers. East End Life is used to reach the widest possible audience when printing public notices or advertising consultations or policies.

### **Online Service**

More and more services are being offered online. Pupil Services is working with stakeholders to understand their views on online services. The most recent applications for primary reception places and secondary transfer have seen an increase in online applications. Pupil Services has supported parents by providing step-by-step guidance on completing online applications. School staff were also trained in order for parents to access support at first contact. It is anticipated that the access to online services will empower service users and enable them to access information out of hours. The Authority is mindful that online services may be inaccessible for some families who are not IT literate or do not have access to such facilities, therefore support will be provided from officers at all stages. The Council's Idea stores and schools will also be able to provide access to computers for families to complete school application and access online services. The

impact of increased online facilities will be monitored to ensure that no one group of residents are disadvantaged.

### Recent consultation exercises carried out

- Consultation for admissions in 2013/14, undertaken in 2011/12
  - Consultation lasted for over 12 weeks
  - LA consulted with schools, governing bodies, children centre's (both staff and parents), local community organisations, churches, mosques, GP surgeries, housing associations, local neighbouring local authorities etc.
  - Consultation was advertised in local and Bengali newspapers
- Consultation for admissions in 2015/16, undertaken in 2013
  - Consultation lasted for over 8 weeks
  - LA consulted with TH residents, schools, governing bodies, admissions forums etc.
  - Consultation was advertised in local and Bengali newspapers
  - Consultation meeting with Primary school teachers and parents, for admissions in 2015/16, undertaken in 2013, with over 30 attendees
- Consultation for admission in 2016/17, undertaken in 2014
  - Consultation lasted for over 8 weeks
  - LA consulted with, TH residents, schools, local community organisations, governing bodies, children centres, admissions forums etc.
  - Consultation was advertised in East End Life. The complete communication plan is included in Appendix B.

### Key Findings from 2016/17 consultation

Despite using various methods to engage stakeholders, there were only four responses from residents.

There was a collective response completed by the Tower Hamlets (TH) Admissions Forum and comments were also received from the City of London Admissions Forum.

The following analysis shows the outcome of the 4 residents and the Admissions Forums responses:

*All respondents agreed with the proposed arrangements for TH Nursery Schools admissions 2016/17. The TH Admissions Forum agreed with the proposed arrangements and oversubscription criteria for admission to Nursery schools. There was no objection to this from the City of London Admissions Forum.*

*3 out of 4 respondents (75%) disagreed with the proposed arrangements and oversubscription criteria for admission to community primary schools. The TH Admissions Forum also agreed with the proposed arrangements and oversubscription criteria for admission to community primary schools. There was no objection to this from the City of*



*London Admissions Forum.*

*75% of respondents (3 people) agreed to the proposed arrangements for oversubscription criteria for admission to community secondary schools in 2016/17. The TH Admissions Forum agreed with the proposed arrangements and oversubscription criteria for admission to community primary schools. There was no objection to this from the City of London Admissions Forum.*

*3 of the 4 respondents (75%) agreed with TH's scheme for coordinating year 7 and reception year admissions. The TH Admissions Forum agreed with the proposed arrangements and oversubscription criteria for admission to community primary schools. There was no objection to this from the City of London Admissions Forum.*

*75% of respondents (3 people) disagreed to the TH's scheme for co-ordinating in-year admissions. Whilst the TH Admissions Forum had agreed with the proposed admissions arrangements, they also made the following comments: Diocesan Schools are advised they must comply with the agreed in-year arrangements, however individual schools may decide not to.*

*3 of the 4 respondents (75%) agreed to the PAN for TH schools in 2016/17. The Admissions Forum provided the following comment: Despite planned expansions and developments notified, there is a request from the Forum for the development or expansion of the previous Bow School site to be brought forward and for school places to be given priority in all decisions.*

*All of the respondents agreed with their schools' Planned Admission Number*

*All of the respondents agreed with the PAN for those schools whose admissions impact on their own school.*

*The City of London Admission Forum did not complete the full questionnaire but have submitted comments related to secondary school priority zones.*

Full details of the consultation are included in Appendix B.

The public consultation took place between 1<sup>st</sup> of November 2014 and 5<sup>th</sup> January 2015. The overall numbers of responses were low, but not unexpected given that no changes were being proposed from those agreed previously; and were in line with other admissions consultations undertaken in previous years.

### **Additional factors which may influence disproportionate or adverse impact?**

#### **Management Arrangements**

There are no management arrangements which could be deemed to have a disproportionate impact on any of the equality target groups.

#### **The Process of Service Delivery**

The Pupil Service operates from 8.00am to 5.30pm on weekdays. The service is used by parents, schools, governors and other agencies. The team is a collection of diverse individuals well placed to represent the beneficiaries of its service.

Pupil Services deals with admissions to schools, including primary and secondary schools in Tower Hamlets and publishes the primary and secondary admission brochures. Applications for reception class places and admission to secondary school, when pupils are 11, must be made through this service. The team is also responsible for the admission appeals for community and some own admission authority schools; the home to school travel pass scheme; and issuing performance licenses and work permits to children and chaperones that are required by employment law. A register is also kept of children who are home educated.

A large number of children in Tower Hamlets schools are from the Bangladeshi community and this group is well represented in the Team. Their expertise and bi-lingual skills are used to ensure parent's queries are answered competently and that parents have full understanding of the processes. However, the needs of some parents who use the service cannot always be met with such a small staff group.

This is of particular concern for minority groups where English is the second language, for example newer communities from Eastern Europe. At present this need is met through translation services where necessary.

In certain circumstances, where the parent or guardian may be unable to physically attend an appointment home visits can be carried out. Facilities for disabled people are available at the Team's location in the Town Hall at Mulberry Place.

Colleagues in other service areas, such as, the 'Family Information Service', School Attendance, Parents Advice Centre and Children's Centres are made aware and kept up to date of significant changes in school admissions. These teams may be the first point of contact for many parents. There is regular communication and training for staff in all schools that have an involvement with admissions, including administrative staff, Heads of Year, Headteachers and governors, whose equality profiles are not available. Most schools have staff that can speak the community languages. Bengali is very widely spoken.

Pupil Services also provide services to schools. The use of technology initiatives such as SchoolView, allows schools to monitor their admissions, check pupil information as well as view and update their waiting lists in real time. This has enabled Pupil Services to form strong partnerships with schools. Sharing information and coordinating efforts ultimately ensures parents receive a proficient and consistent service from multiple contact points.

Involvement with other community groups through collectives, such as, the Tower Hamlets Admissions Forum further reinforces community ties and helps disseminate information about admissions to the wider community. The Admissions Forum's membership has been reviewed to ensure that it well representative of all stakeholders.

Awareness sessions for school based staff on catchment areas and the tie break criterion has strengthened working relationships with key stakeholders ensuring parents receive an informed and consistent message regardless of whom may be their first point of contact.

Target Groups	Impact	Reason(s)
Race	Positive (Parents and pupils)	<p>The school admissions policies do not discriminate against or show bias towards any particular race. The admissions policies for community schools are not based on race, therefore all race groups are treated equally, and decisions made accordingly.</p> <p>Analysis of reception applications between 2011 and 2013 show that 85.7% of pupils (12,011 pupils) who applied for a school place were from a Black, Asian or minority ethnic (BAME) group. The remaining 14.3% (2,007) were from a White ethnic group. 2437 reception applications received in 2014 were from a BAME background. This information was gathered from the Central Pupil Database (where the ethnicity information was available as some families refused to provide ethnicity information at the point of data collection) and is shown in Appendix A, Table 3.3a.</p> <p>Based on the 2014 Spring School census data, Appendix A Table 3.3a shows a breakdown of ethnicity by year group. The number of BAME children in Reception, Year 1 and Year 2 remain consistent. There are no large fluctuations between these year groups to suggest that any one group has benefited disproportionately. Appendix A, Table 3.3b shows a breakdown of the different ethnicities per school.</p> <p><b>Reducing inequalities – previous 85%</b>            Across Tower Hamlets, 87.1% of BAME pupils were able secure their first choice of secondary school, which equates to 2109 pupils out of 22420. Previously, in 2013/14 only 65% of BAME pupils living in the Bow area managed to secure their first choice of school. This has improved during the last secondary transfer round to 85%. The relocation and re-designation of Bow school has contributed to this. Appendix A, Table 3.7 shows maps including cut-off distances for Morpeth school for the last three years and Bow school during the most recent 2014/15 school year. Bow school has recently expanded therefore the school was able to accommodate children from a wider section of the borough.</p> <p>Appendix A, Table 3.8 shows the applications to local schools from Bow residents over the last three years. Applications to Morpeth have been relatively similar whilst the relocation of Bow school in 2014 has seen the number of application to that school from Bow residents increase dramatically.</p> <p>The expansion and change of characteristic for the new Bow school has addressed the travelling issues faced by residents in most of the Bow area.</p>

Target Groups	Impact	Reason(s)
		<p><b>Ensuring strong community cohesion</b>            Data from the Spring 2014 census, presented in Appendix A, Table 3.3b highlights the fact that there are 16 schools where more than 85% of the pupils are from one ethnic group. These schools are largely mono-cultural with very few non-Bangladeshi pupils. The principle that had underpinned the Council's admission policy was proximity to school and the location of some schools combined with the local demography results in a mono-cultural intake. Whilst it is natural for the largest group to be represented in the school population, the 'nearest school' tie break alongside school catchment areas may restore some balance and more accurately reflect the local community.</p>
Disability	Positive	<p>The school admission arrangements are designed to accommodate the needs of all applicants. The policy seeks to enable pupils and parents with disabilities to receive additional priority to attend a particular school under its 'medical or social' criterion, which is the second priority group. A judgement is made on each case based on the evidence provided and its merits.</p>
Gender	Positive	<p><b>Nursery and Primary Schools</b>            Gender is not criterion used for ranking in the policies, therefore all pupils will have to be admitted regardless of Gender.</p> <p><b>Secondary schools</b>            The Bow school increases choice for parents of female students in the local area, however Bow has been a boys' school, one of only three in the borough. The change of school characteristic will reduce the choice for parents wishing to send their sons to single sex boys' school.</p> <p><b>Reducing inequalities</b>            The increase in options for girls in the Bow area helped to reduce inequality of choice for girls in that area.</p> <p>Based on 2013 applications data, girls in Bow travelled furthest, with an average distance of more than 1.5km, to access a preferred secondary school. On average, a girl living in Bow would travel more than a girl living in 12 of the remaining 15 wards. Only female pupils living in Blackwall and Cubitt Town, Limehouse and Millwall had to travel further. Furthermore, a girl living in Bow East would travel almost twice the distance to their first choice school compared to a girl living in another area of Tower Hamlets. This is shown in Appendix A, Table 2.3b.</p> <p>Appendix A Table 2.3c shows that the distance girls in Bow travel to access a preferred school has</p>

Target Groups	Impact	Reason(s)
		reduced. This is as a result of the re-designation of Bow school to a mixed school.
Gender Reassignment	Neutral	The school admission arrangements have no gender reassignment criterion. Pupils are admitted regardless of their sexual orientation. However, there is no available evidence to assess the impact of the school admissions policy on groups based on gender reassignment.
Sexual Orientation	Neutral	The school admission arrangements have no sexual orientation criterion. Pupils are admitted regardless of their sexual orientation. However, there is no available evidence to assess the impact of the school admissions policy on groups based on sexual orientation.
Religion or Belief	Neutral	The school admission arrangements have no 'Religion or Belief' criterion. Pupils are admitted regardless of their religion or belief. There are however voluntary aided schools that give priority to their religious denomination and are permitted to so in legislation.
Age	Positive	<p>Pupils of school age are admitted to their respective year group either through the first point of entry to the coordinated admissions round or 'in-year' admission.</p> <p><b>Reducing inequalities</b>            With nursery admission arrangements now in line with the policy for primary admissions will ensure that there is a coherent and consistent approach in admissions in primary phase. It also seeks to enable children to have continuity within the same school setting by minimising the disruption to a child's education by having to change schools between nursery and reception.</p> <p>The introduction of catchment areas for all entry points into school may give clarity and stability to parents, especially those with multiple children. Although sibling priority is offered this is no guarantee of a school place. The continuance of the catchment area criteria could further strengthen the ability for local pupils to secure local school places all the way through the education system.</p>
Marriage and Civil Partnerships.	Neutral	The school admission arrangements have no 'Marriage and Civil Partnership' criterion. Pupils are admitted regardless of the status of their parents/guardians. However, there is no available evidence to assess the impact of the school admissions policy based on marriage or civil partnership status.
Pregnancy and Maternity	Neutral	The school admission arrangements have no 'pregnancy' criterion.

Target Groups	Impact	Reason(s)
<p>Other Socio-economic Carers</p>	<p>Positive</p>	<p><b>Medical or Social needs</b> The second priority group in the admissions arrangements give priority to pupils who apply to a specific school under medical or social grounds. Each case is assessed on its merit.</p> <p><b>Allocations</b> Where a pupil has failed to secure their preferred choice of school, either through a low number of preferences or through oversubscription in all of their six preferences, they are allocated the nearest school with a vacancy. In previous years when there were no catchment areas, the pattern of applications was concentrated in the central schools within the borough, whilst the residents on the borders found themselves at the bottom of the waiting lists. Pupils were allocated schools that were more than two miles away and therefore would be eligible to apply for travel assistance, thereby increasing the travel assistance cost. With the introduction of catchment areas the pattern of application is more localised therefore any pupils who fail to secure their preferred school would likely be offered an alternative option from within nearby.</p> <p>In 2011/12 there were 272 allocations, this decreased to 182 (33%) in 2012/13, however the introduction of catchment areas has seen allocations reduce significantly in 2013/14 from 182 to 90 (50%) and further reduced to 61 allocations In 2014/15 school year, of which only 25 children were placed outside of their catchment area.</p> <p><b>Mobility</b> Based on the Mode of Travel survey, which is shown in Appendix A, where each catchment area is broken down by each table from Tables 3.10 to 3.16.</p> <p>The data for Catchment Area 1 (Appendix A, Table 3.10) shows that majority of pupils – 82.09% (3529 out of 4299 pupils) attending a school in Catchment Area 1 walk to school. Of the 3529 pupils, 79.68% (3812) have a walk to school that is less than 500m.</p> <p>Appendix A, Table 3.11 shows that Catchment Area 2 has a total of 1553 pupils out of 1894 (82%) walk to school, 75.40% of which travel less than 500m. Appendix A, Table 3.12 for Catchment Area 3 has 87.68% (1943 out of 2216) pupils walking to school. 85.64% (1664 out of 1943) had a walking distance less than 500m.</p>

Target Groups	Impact	Reason(s)
		<p>In Catchment Area 4, Appendix A, Table 3.13, 77.58% (2263 out of 2917) walked to school, with 76.84% (1739 pupils) walking less than 500m. Catchment Area 5, Appendix A, Table 3.14, had 73.10% (1049 out of 1435) pupils walking to school, with 71.78% (753 pupils) walking less than 500m.</p> <p>In Catchment Area 6, Appendix A, Table 3.15, 78% of pupils walked to school, with 80.50% (1259) walking less than 500m.</p> <p>Finally, in Catchment Area 7, Appendix A, Table 3.16, 85.03% of pupils (2403 out of 2826) walked to school, with 79.28% (1905) walking less than 500m.</p> <p>The general trend from the above analysis shows that majority of pupils live close enough to their school to be able to walk there. The implementation of the catchment area system and the ‘nearest school’ tie-break will allow more pupils to attend a school within walking distance, as well as reduce the overall distance they would have to travel to get to a school within the catchment area they live in.</p> <p><b>Travel Assistance</b> Those receiving travel assistance in the form of a transport bus service, have reduced since the introduction of catchment areas. There were 137 children in 2012 receiving transport, reducing to 98 in 2013 and further reduced to 60 in 2014. This is shown in Appendix A, Table 3.5.</p> <p>Appendix A, Table 3.6, shows the total number of children receiving travel assistance. There are a high number of BAME children receiving travel assistance. The table includes all children currently receiving one form of travel assistance and includes any previous applications where children were not successful in getting a local school. These include applications from families housed in new developments in the outskirts of the borough. The primary admissions policy which includes the use of the ‘nearest school’ tie break and catchment areas is also applied to in year applications. In addition, priority is also given to children travelling to a school over two miles (or three miles for older children) from home. This is to ensure that children receiving travel assistance are able to secure a local school place at the earliest opportunity; thereby reducing the total number of children receiving travel assistance over a period of time.</p> <p><b>Social housing &amp; new developments</b> With the majority all new developments in Tower Hamlets having units available for social housing,</p>

Target Groups	Impact	Reason(s)
		<p>there will be a greater demand for school places from vulnerable groups.</p> <p>The housing demand shows that of the 19,810 people on the housing waiting list, 56.5% (11,201 people) are of an Asian ethnicity, followed by 22.7% (4,551 people) from a White ethnic group, and 12% (2,385 people) from a Black ethnic group. This is shown in Appendix A, Table 3.17.</p> <p>Some new developments are on the outskirts of the borough whilst the majority are located in areas which would increase the pressure on residents living in the black spots with no nearby school; without the use of the nearest school tie break these families will find themselves at the bottom of the waiting list for all schools due to their proximity.</p> <p>With the use of the nearest school tie break they will have a fairer chance of securing a place at their nearest school. Appendix E shows the location of planned and completed developments. If the tie break criterion was solely based on proximity to school, pupils living in the new developments would find themselves near the bottom of their local schools waiting lists. The profile of residents on the social housing register and the increased pressure on school places as a result of the new developments indicate there would have been an adverse impact on BAME groups had the catchment areas and nearest school tie break not been implemented.</p>



## Section 4 – Mitigating Impacts and Alternative Options

From the analysis and interpretation of evidence in section 2 and 3 - Is there any evidence of or view that suggests that different equality or other protected groups (inc' staff) could have a disproportionately high/low take up of the new proposal?

Yes? No? No

If yes, please detail below how evidence influenced and formed the proposal? For example, why parts of the proposal were added/removed?

*(Please note – a key part of the EA process is to show that we have made reasonable and informed attempts to mitigate any negative impacts. AN EA is a service improvement tool and as such you may wish to consider a number of alternative options or mitigation in terms of the proposal.)*

N/A

## Section 5 – Quality Assurance and Monitoring

Have monitoring systems been put in place to check the implementation of the proposal and recommendations?

Yes? Yes No?

How will the monitoring systems further assess the impact on the equality target groups?

The policy is monitored in a number of ways. Parental preference success rates and admission appeal figures are reported annually to the DfE and are compared with those for other London LAs. The policy is reviewed annually and monitoring reports are used to inform the review, to identify trends, issues and proposals for change.

The Admission Forum monitors the fairness and effectiveness of admission arrangements as well as the Local Authority Fair Access Protocol, which sets the standard for 'in-year' admissions in Tower Hamlets schools as well as protects the rights and opportunities for the most vulnerable children and families.

The admission policies of the voluntary schools are also subject to consultation and comment from the LA under advice from the Admission Forum. The Office of the Schools Adjudicator collects information from the LA to report to the Secretary of State on the extent to which the admission arrangements are compliant with the mandatory requirements of the School Admissions Code 2014 and other statutory requirements contained in Part 3 of the Schools Standards and Framework Act 1998. The LA is obliged to provide a copy of the admission arrangements for this external scrutiny and for all the admission authorities in Tower Hamlets.

### Monitoring

The Equal Chance Analysis Report and other Equality Impact Assessment will continue to be used to monitor the impact on the equality target groups from the outcomes of the coordinated admission process and nursery admissions process.

Report analysis	Indicator
Pupil Preference success rate	Pupils secure preferred school
Distance travelled to school	Pupils securing local school place
Nearest school success rate	Pupils securing local school place
Distance to allocated school	Pupils securing alternative local place
Criteria success rate	Pupils receiving the correct priority
Pupils receiving travel assistance	Admissions pattern by catchment area
Profile of applicants	Impact on race/gender in proportion to population profile
Distance to and catchment area of preferred school	Change in admissions pattern
Distance to and catchment area of preferred school by race	Disproportionate impact on particular ethnic group

Additional FSM analysis to determine if this group is disproportionately affected by the direct and indirect outcomes of the coordinated admission process.

**Quality Assurance**

- Due diligence is carried out on application forms by the Pupil Services Team
- Validation checks are carried out during the application process to ensure applications contain the required data such as application address
- System checks are carried out to ensure iteration process and ranking has been implemented according to the admissions arrangements

**Report to the Admissions Forum**

It will allow the Local Authority to monitor the impact of the policy and any changes that may occur on a year on year basis. As a result it will assist the Local Authority in steering its outlined action plan in having a positive impact on all target groups.

Does the policy/function comply with equalities legislation?  
 (Please consider the [OTH objectives](#) and [Public Sector Equality Duty](#) criteria)

Yes? Yes                      No?

If there are gaps in information or areas for further improvement, please list them below:

How will the results of this Equality Analysis feed into the performance planning process?

The equality analysis exercise has highlighted the need to extend the remit of data collections to effectively monitor the equality target groups.

There is an annual review process subject to a statutory timetable. The process will commence earlier so that the involvement of the parents' panel can be assured and a greater effort made to engage the community.

Consideration will be given to broadening future consultation process to capture increased responses from all stakeholders.

**Section 6 - Action Plan**

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Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
Greater collaboration with services working with parental groups to raise policy awareness to enable informed choices and positives outcomes for families.	Public sessions held throughout the Borough for discussion and Q&A.	Public sessions to take place between October – December 2015.	Terry Bryan	
Widely publish the key dates for nursery admissions to ensure that parents are fully informed about the admissions process.	Publish leaflet as hard copy and organise sessions with Children’s Centre and Parent and Families Support Service	To be completed by October 2015.	Terry Bryan	
Collect nursery admissions outcomes information to monitor decision making.	Ensure that relevant data is captured as part of school data collection exercise.	To be completed by September 2015	Abdul Quddus	
Collaborate with the Family and Support Service to provide impartial advice for families throughout the admissions process.	Guiding parental choice to include the nearest school would help to change the pattern of applications and increase the chance of securing a local school place	To be completed by October 2015.	Terry Bryan	
Review the data collection at the point of application	Consider including data items on common application form that will enable impact assessment on wider	Common Application Form to be updated for applications in the school year 2015/16	Terry Bryan	

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
	equality target group			
Review the quality of data collection from schools.	Ensure that data captured is relevant to report on equality target groups.	To be completed by December 2015.	Abdul Quddus	
Improve the recording of travel assistance data	Travel assistance to be recorded consistently and on the Central Pupil Database to provide opportunity for analysis across the equality target groups.	To be completed by September 2015.	Terry Bryan	
To monitor and report termly to the Admission Forum on the Fair Access Protocol.	Pupil Admissions keep a record of concerns and report them at least monthly to the Service Manager.	Monitoring of the children awaiting school places demonstrates improvement.	Terry Bryan	

**Section 7 – Sign Off and Publication**

<b>Name:</b> (signed off by)	Anne Canning
<b>Position:</b>	Service Head for Learning and Achievement
<b>Date signed off:</b> (approved)	

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**Appendix A**

**Table 2.1 – Residential profile of Tower Hamlets on all ages Ethnicity breakdown based on all ages (Aged 0-85 and over)**

Ethnicity breakdown	Number of residents		Proportion of residents	
	Age 0 to 85 and over	All Ages	Age 0 to 85 and over	All Ages
<b>All Residents</b>				
<b>All categories: Ethnic group</b>	<b>254,096</b>	<b>254,096</b>	<b>100%</b>	<b>100%</b>
White	83,269	83,269	32.8%	32.8%
Other White	31,550	31,550	12.4%	12.4%
Mixed/multiple ethnic group	10,360	10,360	4.1%	4.1%
Asian/Asian British (excluding Bangladeshi)	23,124	23,124	9.1%	9.1%
Bangladeshi	81,377	81,377	32.0%	32.0%
Black/African/Caribbean/Black British	18,629	18,629	7.3%	7.3%
Other ethnic group	5,787	5,787	2.3%	2.3%

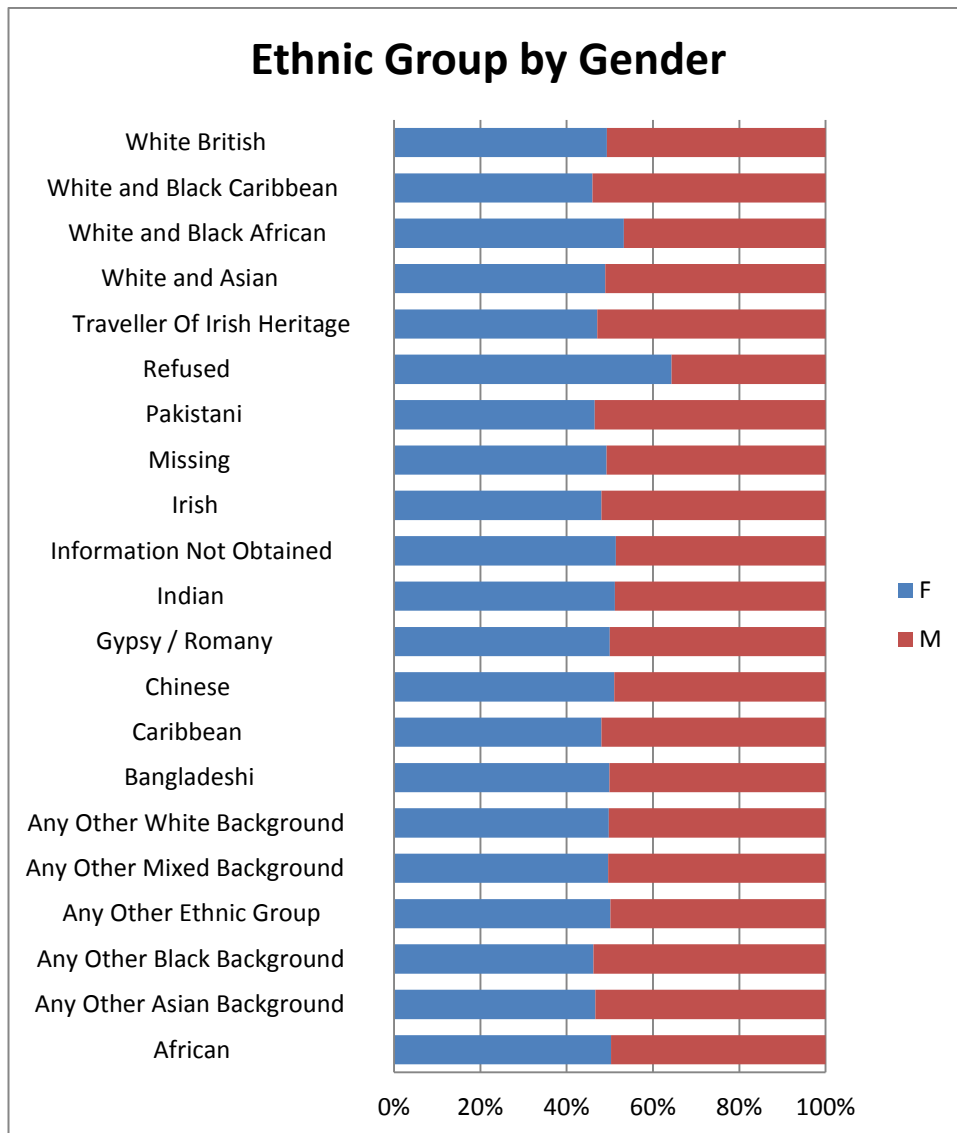
*(National Census, 2011)*

**Table 2.2 – School population profile. Ethnicity breakdown of school population by gender (Nursery to Year 11)**

	F	M	Grand Total
African	1442	1425	2867
Any Other Asian Background	111	127	238
Any Other Black Background	165	192	357
Any Other Ethnic Group	485	483	968
Any Other Mixed Background	390	396	786
Any Other White Background	671	677	1348
Bangladeshi	11338	11369	22707
Caribbean	284	307	591
Chinese	100	96	196
Gypsy / Romany	2	2	4
Indian	157	150	307
Information Not Obtained	37	35	72
Irish	37	40	77
Missing	337	347	684
Pakistani	160	184	344
Refused	9	5	14
Traveller Of Irish Heritage	8	9	17
White and Asian	161	168	329
White and Black African	99	87	186
White and Black Caribbean	263	309	572
White British	1862	1913	3775
Grand Total	18118	18321	36439

[NC Year N1 to 11, spring 2014 pupil census]

**Chart 2.2a Pupil Profile Chart**



[NC Year N1 to 11, spring 2014 pupil census]

**Table 2.3a – Distances travelled by Secondary school pupils**

Distance travelled by secondary School pupils, based on 2014 applicants

Average of DISTANCE	GENDER		Grand Total
	F	M	
WARD			
Bethnal Green	916.02	835.31	878.89
Blackwall and Cubitt Town	3127.20	3001.15	3059.97
Bow East	2121.25	2534.12	2282.80
Bow West	1395.76	1976.85	1657.25
Bromley North	1196.61	1506.67	1376.12
Bromley South	1190.43	1072.25	1145.52
Canary Wharf	3298.79	3006.59	3187.75
Island Gardens	2050.41	2445.40	2252.97
Lansbury	1992.81	1526.53	1784.47
Limehouse	2121.71	1519.48	1957.47
Mile End	1555.06	1504.97	1529.64



Poplar	2312.23	2288.73	2301.38
Shadwell	1000.96	1127.19	1064.08
Spitalfields and Banglatown	1128.81	1224.69	1177.65
St Dunstan's	1341.31	741.80	1020.64
St Katharine's and Wapping	1214.80	1373.82	1300.43
St Peter's	1351.78	1181.22	1257.97
Stepney Green	1075.15	783.47	916.32
Weavers	2054.87	1529.81	1625.27
Whitechapel	722.25	1277.61	989.39
Grand Total	1582.41	1499.97	1542.28

(2014 applications, Central Pupil Database, 2014)

**Table 2.3b – Distance travelled by secondary School pupils, based on 2013 applicants**

Average of DISTANCE	GENDER		
	F	M	Grand Total
WARD			
Bethnal Green	845.16	826.57	836.50
Blackwall and Cubitt Town	3181.39	2794.46	2966.43
Bow East	2172.08	2548.44	2331.75
Bow West	1498.91	2037.60	1775.95
Bromley North	1421.56	1781.18	1591.91
Bromley South	1392.64	1161.35	1269.13
Canary Wharf	2699.25	2816.75	2756.63
Island Gardens	2712.37	3477.79	3038.62
Lansbury	2067.78	1585.11	1840.83
Limehouse	1870.26	2083.65	1980.91
Mile End	1433.74	1276.86	1360.99
Poplar	2426.66	2261.94	2327.14
Shadwell	768.13	1270.59	1046.66
Spitalfields and Banglatown	1104.79	1199.29	1156.19
St Dunstan's	1346.55	770.20	1043.21
St Katharine's and Wapping	624.11	1021.54	868.68
St Peter's	911.86	1072.83	991.53
Stepney Green	961.29	807.28	887.71
Weavers	1026.94	916.20	959.63
Whitechapel	626.72	1370.31	1026.40
Grand Total	1486.85	1505.46	1496.20

(2013 applications, Central Pupil Database, 2014)

**Table 2.3c – comparison 2013/14 and 2014/15 school years**

	Bow Average		Bromley Average	
	F	M	F	M
Academic Year 2014/15	1758.50	2255.48	1193.52	1289.46
Academic Year 2013/14	1835.49	2293.02	1407.10	1471.26
Difference (metres)	-76.99	-37.54	-213.58	-181.80

### Map 2.3d – New Ward Boundaries 2014



**Table 2.4a – BAME Ethnicity profile for secondary school pupils offered their 1<sup>st</sup> preference school. Analysis of BAME ethnicity of pupils offered a secondary place by ward (%)**

	Non-BAME		None BAME Total	BAME		BAME Total	Grand Total
Row Labels	F	M		F	M		
Bethnal Green	14.06%	7.81%	21.88%	32.81%	45.31%	78.13%	100.00%
Blackwall and Cubitt Town	20.51%	20.51%	41.03%	15.38%	43.59%	58.97%	100.00%
Bow East	11.11%	11.11%	22.22%	40.74%	37.04%	77.78%	100.00%
Bow West	5.26%	0.00%	5.26%	52.63%	42.11%	94.74%	100.00%
Bromley North	7.69%	7.69%	15.38%	41.03%	43.59%	84.62%	100.00%
Bromley South	9.09%	2.27%	11.36%	47.73%	40.91%	88.64%	100.00%
Canary Wharf	20.69%	13.79%	34.48%	27.59%	37.93%	65.52%	100.00%
Island Gardens	8.00%	4.00%	12.00%	44.00%	44.00%	88.00%	100.00%
Lansbury	9.86%	9.86%	19.72%	46.48%	33.80%	80.28%	100.00%
Limehouse	27.27%	0.00%	27.27%	36.36%	36.36%	72.73%	100.00%
Mile End	6.67%	5.00%	11.67%	53.33%	35.00%	88.33%	100.00%
Poplar	3.57%	10.71%	14.29%	46.43%	39.29%	85.71%	100.00%
Shadwell	5.41%	0.00%	5.41%	67.57%	27.03%	94.59%	100.00%
Spitalfields and Banglatown	0.00%	0.00%	0.00%	61.76%	38.24%	100.00%	100.00%
St Dunstan's	0.00%	4.88%	4.88%	36.59%	58.54%	95.12%	100.00%
St Katharine's and Wapping	0.00%	21.05%	21.05%	42.11%	36.84%	78.95%	100.00%
St Peter's	6.25%	8.33%	14.58%	39.58%	45.83%	85.42%	100.00%
Stepney Green	5.00%	5.00%	10.00%	45.00%	45.00%	90.00%	100.00%
Weavers	5.13%	7.69%	12.82%	46.15%	41.03%	87.18%	100.00%
Whitechapel	3.57%	0.00%	3.57%	60.71%	35.71%	96.43%	100.00%
<b>Grand Total</b>	<b>8.22%</b>	<b>7.14%</b>	<b>15.36%</b>	<b>44.07%</b>	<b>40.57%</b>	<b>84.64%</b>	<b>100.00%</b>

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(Central Pupil Database 2015)

The table above (2.4) discounts pupils that do not have ethnicity recorded, or refused to provide that information. BAME total is from all pupils with an ethnicity code.

Table 2.4b – Average for pupils living in Bow offered their 1<sup>st</sup> preference school

Bow East	11.11%	11.11%	22.22%	40.74%	37.04%	77.78%	100.00%
Bow West	5.26%	0.00%	5.26%	52.63%	42.11%	94.74%	100.00%
Bromley North	7.69%	7.69%	15.38%	41.03%	43.59%	84.62%	100.00%
Bromley South	9.09%	2.27%	11.36%	47.73%	40.91%	88.64%	100.00%
Bow Average	8.19%	5.56%	13.74%	46.69%	39.57%	86.26%	100.00%
Bromley Average	8.39%	4.98%	13.37%	44.38%	42.25%	86.63%	100.00%

**Table 2.4c – BAME Ethnicity profile for secondary school pupils offered their 1<sup>st</sup> preference school. Analysis of BAME ethnicity of pupils offered a secondary place by ward (numbers)**

Row Labels	Non-BAME		None BAME Total	BAME		BAME Total	Grand Total
	F	M		F	M		
Bethnal Green	16	8	24	72	76	148	172
Blackwall and Cubitt Town	18	13	31	30	45	75	106
Bow East	11	11	22	40	45	85	107
Bow West	12	16	28	37	34	71	99
Bromley North	7	9	16	40	48	88	104
Bromley South	5	3	8	83	62	145	153
Canary Wharf	11	8	19	41	38	79	98
Island Gardens	8	7	15	24	32	56	71
Lansbury	15	16	31	109	98	207	238
Limehouse	4	2	6	10	10	20	26
Mile End	8	7	15	91	84	175	190
Poplar	7	6	13	49	43	92	105
Shadwell	4		4	59	61	120	124
Spitalfields and Banglatown	2	7	9	55	43	98	107
St Dunstan's	3	4	7	65	78	143	150
St Katharine's and Wapping	3	7	10	19	16	35	45
St Peter's	16	10	26	72	79	151	177
Stepney Green	5	4	9	55	63	118	127
Weavers	3	11	14	50	45	95	109
Whitechapel	2	2	4	54	54	108	112
<b>Grand Total</b>	<b>160</b>	<b>151</b>	<b>311</b>	<b>1055</b>	<b>1054</b>	<b>2109</b>	<b>2420</b>

**Table 3.1 Tower Hamlets Resident Profile. Full Ethnic breakdown of residents based on all ages (Aged 0 to 85 and over)**

Full Breakdown of Ethnicity	Number of residents		Proportion of residents	
	Age 0 to 85 and over	All Ages	Age 0 to 85 and over	All Ages
<b>All Residents</b>				
All categories: Ethnic group	254,096	254,096	100%	100%
<b>White: Total</b>	<b>114,819</b>	<b>114,819</b>	<b>45.2%</b>	<b>45.2%</b>
<i>White: English/Welsh/Scottish/Northern Irish/British</i>	79,231	79,231	31.2%	31.2%
<i>White: Irish</i>	3,863	3,863	1.5%	1.5%
<i>White: Gypsy or Irish Traveller</i>	175	175	0.1%	0.1%
<i>White: Other White</i>	31,550	31,550	12.4%	12.4%
<b>Mixed/multiple ethnic group: Total</b>	<b>10,360</b>	<b>10,360</b>	<b>4.1%</b>	<b>4.1%</b>
<i>Mixed/multiple ethnic group: White and Black Caribbean</i>	2,837	2,837	1.1%	1.1%
<i>Mixed/multiple ethnic group: White and Black African</i>	1,509	1,509	0.6%	0.6%
<i>Mixed/multiple ethnic group: White and Asian</i>	2,961	2,961	1.2%	1.2%
<i>Mixed/multiple ethnic group: Other Mixed</i>	3,053	3,053	1.2%	1.2%
<b>Asian/Asian British: Total</b>	<b>104,501</b>	<b>104,501</b>	<b>41.1%</b>	<b>41.1%</b>
<i>Asian/Asian British: Indian</i>	6,787	6,787	2.7%	2.7%
<i>Asian/Asian British: Pakistani</i>	2,442	2,442	1.0%	1.0%
<i>Asian/Asian British: Bangladeshi</i>	81,377	81,377	32.0%	32.0%
<i>Asian/Asian British: Chinese</i>	8,109	8,109	3.2%	3.2%
<i>Asian/Asian British: Other Asian</i>	5,786	5,786	2.3%	2.3%
<b>Black/African/Caribbean/Black British: Total</b>	<b>18,629</b>	<b>18,629</b>	<b>7.3%</b>	<b>7.3%</b>
<i>Black/African/Caribbean/Black British: African</i>	9,495	9,495	3.7%	3.7%
<i>Black/African/Caribbean/Black British: Caribbean</i>	5,341	5,341	2.1%	2.1%
<i>Black/African/Caribbean/Black British: Other Black</i>	3,793	3,793	1.5%	1.5%
<b>Other ethnic group: Total</b>	<b>5,787</b>	<b>5,787</b>	<b>2.3%</b>	<b>2.3%</b>
<i>Other ethnic group: Arab</i>	2,573	2,573	1.0%	1.0%
<i>Other ethnic group: Any other ethnic group</i>	3,214	3,214	1.3%	1.3%

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(National Census, 2011)

**Table 3.2 Tower Hamlets Residents Profile, Ethnicity breakdown of residents aged 0 to 4**

Ethnicity Breakdown	Number of residents		Proportion of residents	
	Age 0 to 4	All Ages	Age 0 to 4	All Ages
<b>All Residents</b>				
<b>All categories: Ethnic group</b>	<b>18,750</b>	<b>254,096</b>	<b>100%</b>	<b>100%</b>
White	3,153	83,269	16.8%	32.8%
Other White	999	31,550	5.3%	12.4%
Mixed/multiple ethnic group	1,851	10,360	9.9%	4.1%
Asian/Asian British (excluding Bangladeshi)	1,292	23,124	6.9%	9.1%
Bangladeshi	9,280	81,377	49.5%	32.0%
Black/African/Caribbean/Black British	1,823	18,629	9.7%	7.3%
Other ethnic group	352	5,787	1.9%	2.3%

(National Census, 2011)

**Table 3.3a – Pupil ethnicity profile - Breakdown of ethnicity by year group**

Row Labels	N1	N2	R	1	2	3	4	5	6	7	8	9	10	11	Grand Total
African	124	78	275	245	248	275	203	227	211	181	209	196	207	188	2867
Any Other Asian Background	11	8	25	19	21	24	20	15	16	18	10	15	19	17	238
Any Other Black Background	9	7	33	25	26	30	25	32	31	22	22	27	32	36	357
Any Other Ethnic Group	44	33	98	103	116	95	82	85	67	54	43	57	45	46	968
Any Other Mixed Background	48	40	109	94	84	72	63	71	59	18	36	38	27	27	786
Any Other White Background	53	47	147	144	127	105	108	104	101	73	80	79	93	87	1348
Bangladeshi	872	730	1803	1926	1845	1836	1841	1900	1905	1717	1609	1611	1538	1574	22707
Caribbean	8	9	27	43	45	46	52	32	50	49	52	61	60	57	591
Chinese	12	11	25	16	14	22	14	14	16	3	5	11	14	19	196
Gypsy / Romany				1				1			1		1		4
Indian	14	24	40	39	20	37	25	15	13	14	21	14	16	15	307
Information Not Obtained	2	22	6	4	3	7	3	5	3	6	3	6	1	1	72
Irish	2	1	4	8	3	9	9	11	6	5	3	2	9	5	77
Missing	501	168	15												684
Pakistani	14	17	25	28	38	39	28	26	28	21	23	16	25	16	344
Refused			1	2						4		5	1	1	14
Traveller Of Irish Heritage		1	2	3	1	1	3	1		1	1	1		2	17
White and Asian	13	12	36	35	38	34	28	32	19	12	16	18	22	14	329
White and Black African	7	1	13	16	16	18	16	13	9	15	13	23	15	11	186
White and Black Caribbean	12	9	37	37	60	65	46	43	47	38	37	45	52	44	572
White British	147	104	346	331	344	314	300	333	286	212	234	274	271	279	3775
<b>Grand Total</b>	<b>1893</b>	<b>1322</b>	<b>3067</b>	<b>3119</b>	<b>3049</b>	<b>3029</b>	<b>2866</b>	<b>2960</b>	<b>2867</b>	<b>2463</b>	<b>2418</b>	<b>2499</b>	<b>2448</b>	<b>2439</b>	<b>36439</b>

Spring 2014 census



**Table 3.3b – Pupil ethnicity profile - Proportion of ethnicity per school**

School	African	Any Other Asian Background	Any Other Black Background	Any Other Ethnic Group	Any Other Mixed Background	Any Other White Background	Bangladeshi	Caribbean	Chinese	Gypsy / Romany	Indian	Information Not Obtained	Irish	Missing	Pakistani	Refused	Traveller Of Irish Heritage	White and Asian	White and Black African	White and Black Caribbean	White British
St Marys & St Michaels RC School	22%	1%	1%	6%	5%	10%	4%	9%	1%	0%	1%	0%	1%	8%	1%	0%	1%	2%	2%	5%	21%
St Elizabeth Catholic Primary School	11%	0%	8%	5%	6%	13%	0%	5%	0%	0%	0%	0%	4%	0%	0%	0%	0%	2%	3%	10%	33%
Lansbury Lawrence Primary School	8%	0%	0%	3%	2%	1%	74%	0%	1%	0%	1%	0%	0%	0%	1%	0%	0%	0%	0%	1%	8%
Malmesbury Primary School	8%	0%	1%	3%	2%	5%	65%	1%	1%	0%	1%	0%	0%	0%	0%	0%	0%	1%	0%	1%	11%
Ben Jonson Primary School	10%	0%	0%	3%	0%	2%	80%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	1%	0%	0%	1%
Bonner Primary School	14%	0%	0%	3%	2%	3%	55%	0%	1%	0%	1%	0%	0%	0%	1%	0%	0%	2%	0%	2%	14%
Old Palace J, M & I School	11%	0%	0%	2%	3%	1%	75%	1%	0%	0%	0%	0%	0%	0%	2%	0%	0%	1%	0%	0%	2%
Canon Barnett Primary School	13%	0%	0%	2%	2%	3%	74%	1%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	1%	0%	3%
Cayley Primary School	3%	0%	1%	2%	2%	3%	85%	0%	0%	0%	1%	0%	0%	1%	1%	0%	0%	1%	0%	0%	2%
Blue Gate Fields Junior School	4%	0%	0%	1%	1%	0%	91%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	1%	0%	0%	0%

School	African	Any Other Asian Background	Any Other Black Background	Any Other Ethnic Group	Any Other Mixed Background	Any Other White Background	Bangladeshi	Caribbean	Chinese	Gypsy / Romany	Indian	Information Not Obtained	Irish	Missing	Pakistani	Refused	Traveller Of Irish Heritage	White and Asian	White and Black African	White and Black Caribbean	White British
Chisenhale Primary School	7%	0%	0%	3%	5%	7%	35%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	2%	1%	2%	36%
Columbia Primary School	7%	1%	0%	2%	3%	8%	46%	1%	0%	0%	1%	0%	0%	0%	0%	0%	0%	2%	0%	2%	26%
Cubitt Town Junior School	8%	3%	1%	3%	2%	4%	52%	1%	1%	0%	1%	0%	0%	0%	1%	0%	0%	2%	1%	3%	18%
Cyril Jackson Primary School	8%	2%	1%	4%	2%	3%	67%	0%	0%	0%	1%	0%	0%	0%	2%	0%	0%	1%	0%	1%	7%
The Clara Grant Primary School	9%	0%	1%	3%	2%	1%	77%	1%	1%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	1%	3%
Globe Primary School	17%	2%	2%	1%	3%	4%	52%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%	2%	17%
Hague Primary School	1%	0%	0%	1%	3%	1%	90%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	3%
Harbinger Primary School	3%	0%	1%	4%	6%	8%	56%	0%	3%	0%	3%	0%	0%	0%	1%	0%	0%	1%	1%	1%	13%
John Scurr Primary	3%	1%	0%	1%	1%	1%	88%	0%	1%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	3%
Lawdale Junior School	3%	0%	0%	3%	1%	0%	85%	3%	0%	0%	1%	0%	0%	0%	0%	0%	0%	1%	0%	0%	3%
Elizabeth Selby Infants' School	6%	0%	0%	6%	1%	1%	79%	1%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	3%
Marion Richardson Primary School	7%	1%	1%	1%	1%	3%	78%	1%	1%	0%	0%	0%	0%	0%	2%	0%	0%	1%	0%	1%	2%

School	African	Any Other Asian Background	Any Other Black Background	Any Other Ethnic Group	Any Other Mixed Background	Any Other White Background	Bangladeshi	Caribbean	Chinese	Gypsy / Romany	Indian	Information Not Obtained	Irish	Missing	Pakistani	Refused	Traveller Of Irish Heritage	White and Asian	White and Black African	White and Black Caribbean	White British
Marnier Primary School	5%	0%	0%	1%	1%	1%	82%	1%	0%	0%	1%	0%	0%	0%	2%	0%	0%	1%	0%	1%	1%
Mayflower Primary School	4%	1%	0%	1%	1%	1%	89%	1%	0%	0%	1%	0%	0%	0%	1%	0%	0%	1%	0%	0%	1%
Mowlem Primary School	3%	0%	1%	3%	1%	3%	82%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	1%	4%
Blue Gate Fields Infants School	5%	1%	1%	2%	2%	0%	88%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	1%	0%	0%	0%
Olga Primary School	10%	0%	0%	0%	4%	2%	47%	2%	0%	0%	0%	0%	2%	1%	0%	0%	0%	3%	0%	2%	25%
Redlands Primary School	4%	0%	0%	2%	1%	1%	90%	0%	0%	0%	0%	0%	0%	0%	2%	0%	0%	0%	0%	0%	0%
Manorfield Primary School	12%	1%	2%	4%	2%	3%	53%	1%	1%	0%	0%	1%	0%	1%	1%	0%	0%	1%	0%	2%	13%
Stebon Primary School	4%	1%	0%	0%	1%	1%	91%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Stewart Headlam Primary School	10%	1%	1%	5%	2%	2%	74%	1%	2%	0%	1%	0%	0%	0%	0%	0%	0%	1%	0%	0%	2%
Virginia Primary School	10%	1%	0%	5%	3%	4%	75%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	3%
Wellington Primary School	11%	1%	0%	3%	1%	4%	66%	1%	1%	0%	2%	0%	1%	0%	4%	0%	1%	0%	0%	0%	6%
Woolmore Primary School	10%	0%	0%	5%	1%	1%	75%	0%	0%	0%	0%	0%	0%	0%	3%	0%	0%	0%	0%	0%	2%

School	African	Any Other Asian Background	Any Other Black Background	Any Other Ethnic Group	Any Other Mixed Background	Any Other White Background	Bangladeshi	Caribbean	Chinese	Gypsy / Romany	Indian	Information Not Obtained	Irish	Missing	Pakistani	Refused	Traveller Of Irish Heritage	White and Asian	White and Black African	White and Black Caribbean	White British
Thomas Buxton Primary School	6%	0%	0%	4%	2%	0%	83%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	1%
Seven Mills Primary School	5%	0%	0%	3%	3%	4%	68%	2%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	3%	9%
Cubitt Town Infants' School	8%	1%	1%	4%	6%	2%	47%	1%	2%	0%	3%	0%	0%	2%	1%	0%	0%	1%	1%	2%	18%
Osmani Primary School	7%	0%	0%	4%	1%	0%	82%	0%	1%	0%	1%	0%	0%	1%	2%	0%	0%	0%	0%	0%	0%
Shapla Primary	4%	3%	1%	2%	1%	1%	87%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%
Hermitage Primary School	3%	0%	0%	5%	5%	6%	64%	1%	0%	0%	3%	0%	1%	0%	1%	0%	0%	2%	1%	0%	8%
Bangabandhu Primary School	7%	0%	0%	3%	2%	1%	78%	0%	0%	0%	1%	0%	0%	0%	1%	0%	0%	2%	0%	1%	3%
Halley Primary School	2%	0%	0%	2%	0%	0%	90%	0%	0%	0%	0%	0%	0%	0%	2%	0%	0%	1%	0%	0%	2%
Bigland Green Primary School	4%	0%	0%	4%	1%	1%	85%	0%	0%	0%	1%	0%	0%	1%	1%	0%	0%	1%	0%	0%	1%
Kobi Nazrul Primary School	2%	0%	0%	2%	0%	0%	93%	0%	0%	0%	0%	0%	0%	0%	2%	0%	0%	0%	0%	0%	0%
Smithy Street School	6%	0%	0%	2%	1%	2%	82%	0%	0%	0%	0%	0%	0%	0%	2%	0%	0%	1%	0%	0%	3%
Bygrove Primary School	7%	0%	0%	2%	0%	1%	80%	0%	0%	1%	2%	0%	0%	0%	2%	0%	0%	1%	0%	0%	4%

School	African	Any Other Asian Background	Any Other Black Background	Any Other Ethnic Group	Any Other Mixed Background	Any Other White Background	Bangladeshi	Caribbean	Chinese	Gypsy / Romany	Indian	Information Not Obtained	Irish	Missing	Pakistani	Refused	Traveller Of Irish Heritage	White and Asian	White and Black African	White and Black Caribbean	White British
William Davis Primary School	9%	1%	0%	3%	2%	2%	75%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	1%	0%	1%	3%
Arnhem Wharf Primary School	11%	1%	1%	7%	3%	3%	53%	1%	1%	0%	4%	0%	0%	0%	1%	0%	0%	1%	2%	4%	9%
Harry Gosling Primary School	4%	0%	0%	2%	1%	1%	89%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%
Christ Church CofE School	7%	0%	2%	3%	5%	5%	61%	7%	0%	0%	0%	0%	0%	0%	3%	0%	0%	0%	0%	0%	5%
Guardian Angels Roman Catholic Primary School	10%	2%	6%	5%	19%	8%	2%	9%	0%	0%	4%	0%	2%	0%	0%	0%	0%	0%	0%	1%	31%
Stepney Greencoats Church of England Primary School	7%	2%	2%	3%	3%	4%	39%	2%	2%	0%	0%	3%	0%	0%	0%	1%	0%	0%	1%	4%	30%
Our Lady RC Primary School	16%	1%	3%	1%	7%	10%	2%	3%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	5%	5%	44%
St Agnes RC Primary	24%	1%	2%	5%	8%	5%	0%	9%	1%	0%	0%	0%	1%	0%	0%	0%	2%	2%	2%	9%	31%
St Anne's Catholic Primary School	10%	1%	4%	9%	8%	10%	3%	4%	0%	0%	1%	4%	1%	0%	1%	0%	0%	1%	1%	6%	34%
St Edmund's Catholic Primary School	8%	4%	0%	4%	4%	25%	1%	2%	2%	0%	4%	0%	0%	0%	0%	0%	0%	6%	2%	6%	30%

School	African	Any Other Asian Background	Any Other Black Background	Any Other Ethnic Group	Any Other Mixed Background	Any Other White Background	Bangladeshi	Caribbean	Chinese	Gypsy / Romany	Indian	Information Not Obtained	Irish	Missing	Pakistani	Refused	Traveller Of Irish Heritage	White and Asian	White and Black African	White and Black Caribbean	White British
St John's Church of England Primary School	8%	0%	3%	2%	2%	3%	31%	5%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	7%	33%
St Luke's Church of England Primary School	8%	1%	3%	3%	6%	8%	24%	1%	5%	0%	9%	0%	0%	0%	1%	0%	0%	1%	1%	2%	29%
St Matthias Church of England Primary School	7%	1%	1%	2%	3%	9%	45%	4%	0%	0%	4%	0%	1%	0%	1%	0%	0%	1%	0%	1%	17%
St Paul with St Luke C of E Primary School	9%	0%	2%	1%	2%	4%	61%	6%	1%	0%	1%	1%	0%	0%	1%	0%	0%	0%	1%	1%	12%
St Pauls Whitechapel Church of England	6%	0%	3%	1%	5%	5%	60%	1%	2%	0%	2%	0%	0%	0%	3%	0%	0%	3%	2%	0%	6%
St Peters London Docks CofE Primary	2%	1%	2%	4%	9%	6%	32%	3%	1%	0%	1%	7%	0%	0%	2%	0%	0%	7%	0%	3%	20%
St Saviour's Church of England Primary School	8%	1%	2%	1%	8%	4%	3%	1%	1%	0%	0%	0%	0%	0%	0%	0%	0%	1%	2%	3%	63%
English Martyrs Roman Catholic Primary School	4%	0%	0%	5%	5%	40%	2%	4%	1%	0%	0%	0%	1%	0%	0%	0%	0%	6%	2%	3%	26%

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School	African	Any Other Asian Background	Any Other Black Background	Any Other Ethnic Group	Any Other Mixed Background	Any Other White Background	Bangladeshi	Caribbean	Chinese	Gypsy / Romany	Indian	Information Not Obtained	Irish	Missing	Pakistani	Refused	Traveller Of Irish Heritage	White and Asian	White and Black African	White and Black Caribbean	White British
Holy Family Catholic School	24%	2%	2%	5%	1%	16%	0%	4%	1%	0%	1%	0%	0%	0%	0%	0%	0%	0%	2%	4%	37%
Bow School of Maths and Computing	4%	0%	0%	2%	2%	4%	70%	2%	0%	0%	1%	0%	0%	0%	1%	0%	0%	1%	0%	1%	12%
Langdon Park School	9%	1%	0%	2%	0%	3%	66%	1%	1%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	2%	12%
Morpeth School	7%	1%	1%	1%	1%	3%	66%	1%	1%	0%	1%	0%	0%	0%	0%	0%	0%	1%	0%	2%	14%
Mulberry School for Girls	3%	0%	0%	2%	0%	0%	93%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	1%
Stepney Green Maths & Computing College	1%	0%	0%	1%	0%	1%	96%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%
St Paul's Way Trust School	5%	0%	0%	2%	1%	2%	84%	1%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	3%
Oaklands Secondary School	4%	0%	0%	0%	0%	4%	84%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	5%
Swanlea School, Whitechapel	9%	0%	1%	1%	0%	2%	80%	1%	0%	0%	1%	0%	0%	0%	1%	0%	0%	0%	0%	0%	2%
Bishop Challoner Catholic Collegiate School	24%	2%	3%	5%	2%	13%	9%	9%	0%	0%	1%	0%	0%	0%	1%	0%	0%	2%	3%	6%	19%
George Green's	7%	1%	1%	3%	1%	5%	50%	1%	2%	0%	1%	0%	1%	0%	0%	0%	0%	1%	1%	1%	23%

School	African	Any Other Asian Background	Any Other Black Background	Any Other Ethnic Group	Any Other Mixed Background	Any Other White Background	Bangladeshi	Caribbean	Chinese	Gypsy / Romany	Indian	Information Not Obtained	Irish	Missing	Pakistani	Refused	Traveller Of Irish Heritage	White and Asian	White and Black African	White and Black Caribbean	White British	
School																						
Central Foundation Girls' School	6%	1%	1%	1%	1%	1%	84%	1%	0%	0%	1%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	3%
Sir John Cass/Redcoat School	8%	1%	1%	2%	0%	2%	75%	3%	1%	0%	0%	0%	0%	0%	1%	0%	0%	1%	1%	1%	1%	3%
Bishop Challoner Catholic Collegiate School	22%	2%	4%	7%	2%	13%	8%	9%	1%	0%	2%	0%	0%	0%	1%	0%	0%	1%	3%	5%	20%	
Raine's Foundation School	11%	1%	6%	2%	4%	6%	9%	10%	0%	0%	1%	1%	1%	0%	0%	0%	0%	1%	1%	5%	42%	
Total	8%	1%	1%	3%	2%	4%	63%	2%	1%	0%	1%	0%	0%	2%	1%	0%	0%	1%	1%	2%	10%	



**Appendix A, Table 3.4 – Children placed at a school outside their Catchment Area.**

	Catchment 1 Stepney	Catchment 2 Bow North	Catchment 3 Bow South	Catchment 4 Poplar	Catchment 5 Isle of Dogs	Catchment 6 Wapping	Catchment 7 Bethnal Green	Total
2014/15	0	0	0	0	0	0	0	0
2013/14	0	2	0	6	17	0	0	25
2012/13	18	40	32	56	13	6	19	184

**Appendix A, Table 3.5 – Travel Assistance**

Children on Transport

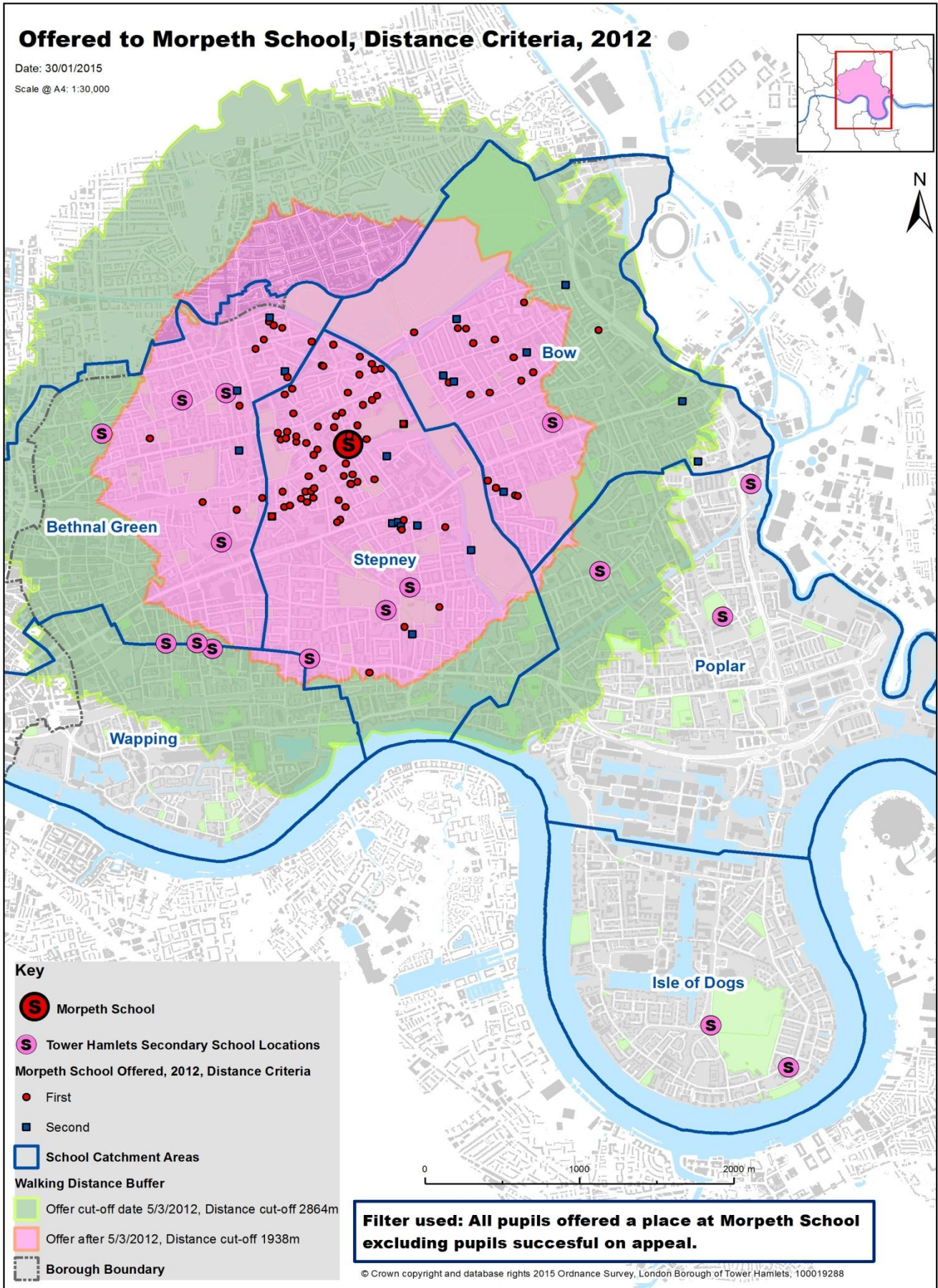
2012	2013	2014
137	98	60

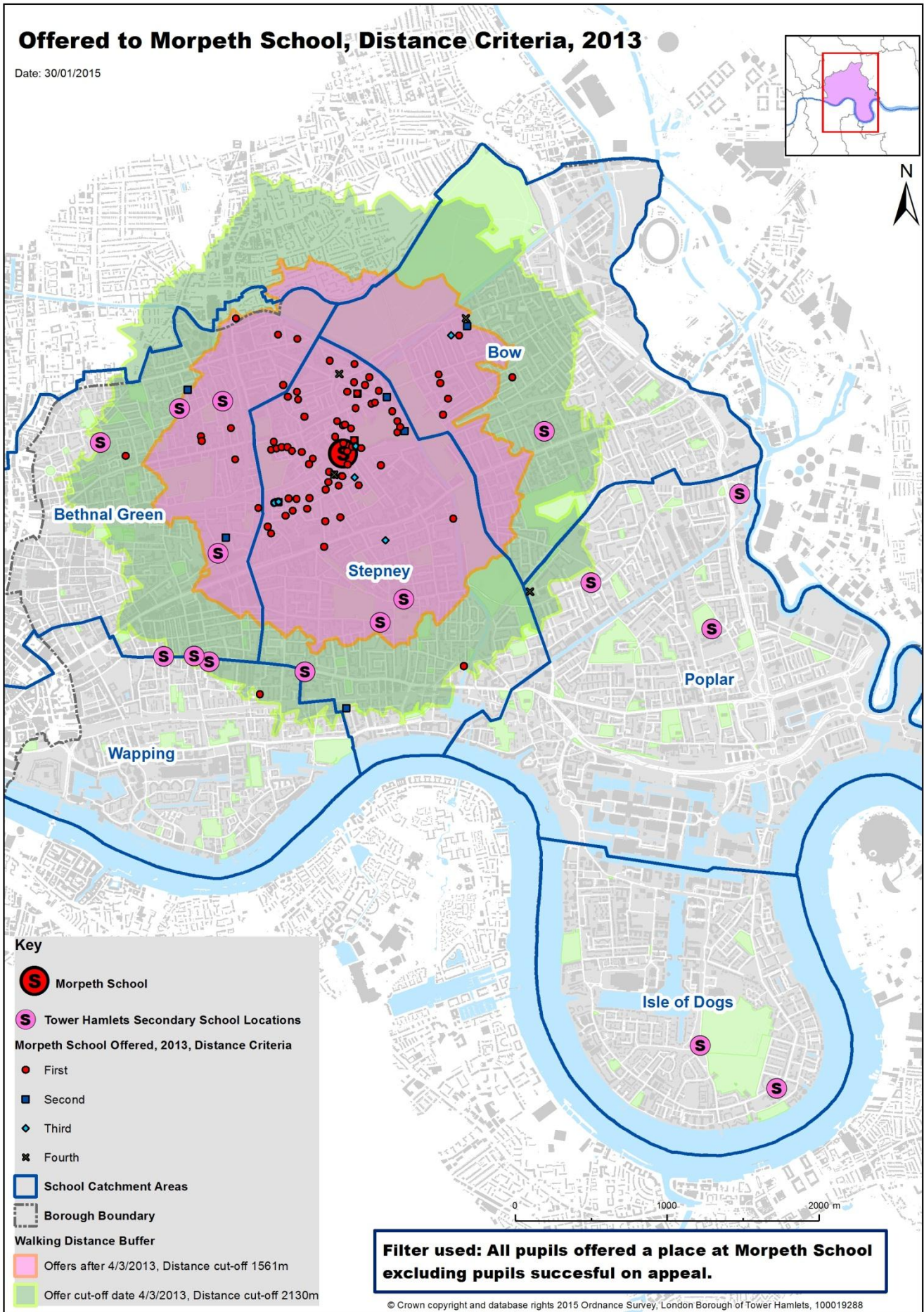
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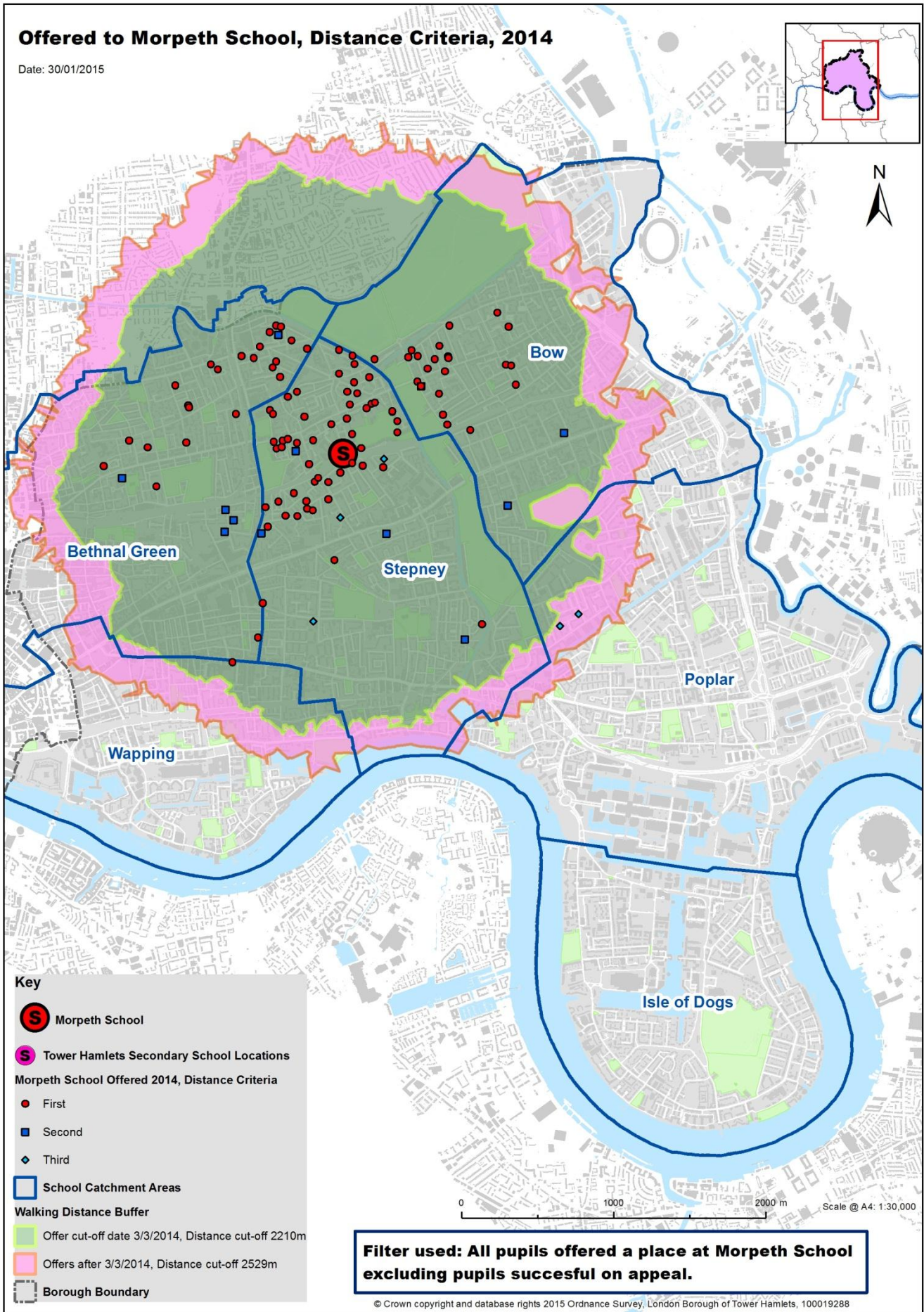
**Table 3.6 - Children currently receiving one form of travel assistance – breakdown by ethnicity**

Ethnicity	Travel Assistance	%
Bangladeshi	125	76.6%
Black	16	9.8%
Other BAME	8	4.9%
White other	5	3.1%
White British	4	2.5%
Information not obtained	5	3.1%
Total	163	100%

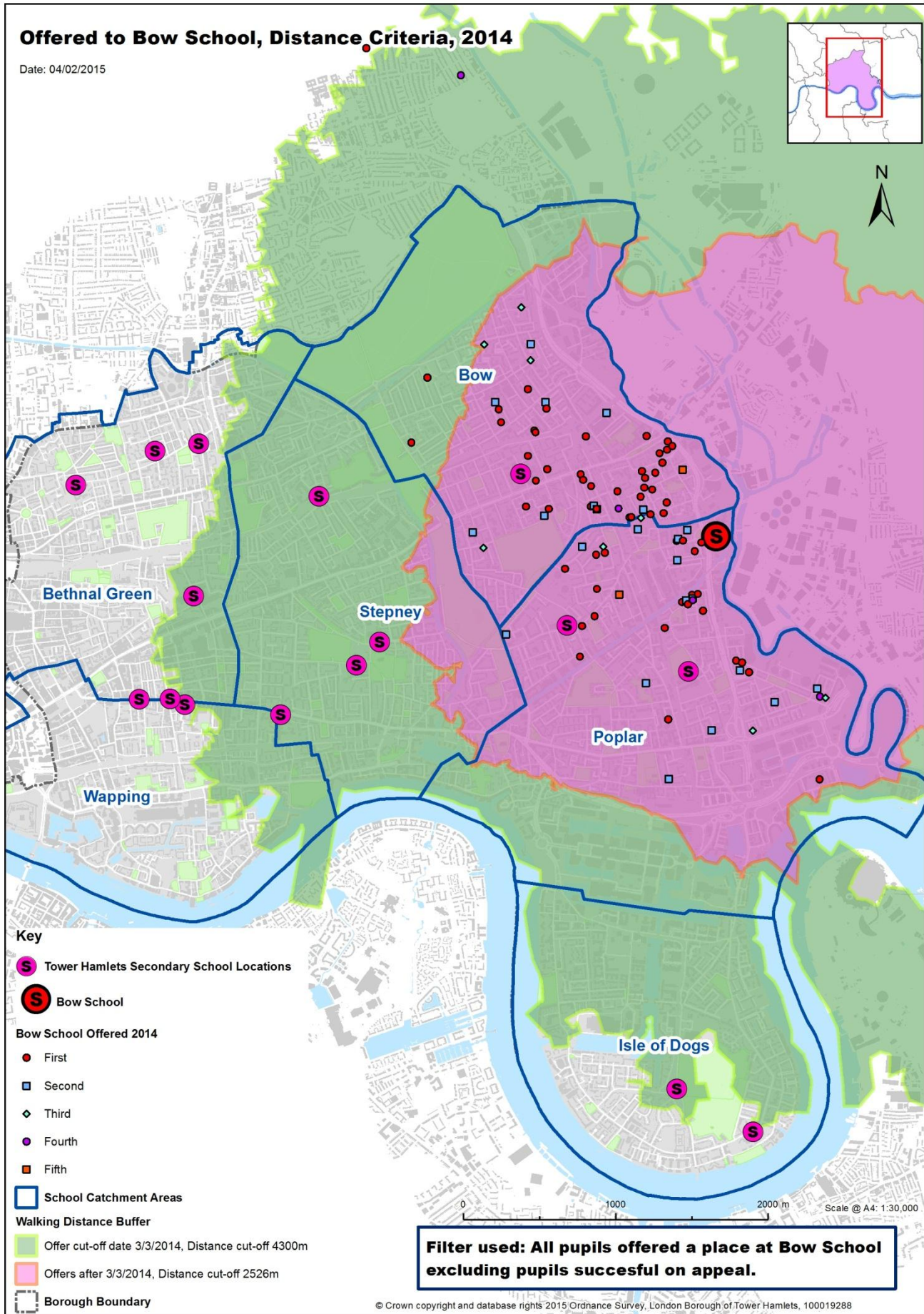
Table 3.7



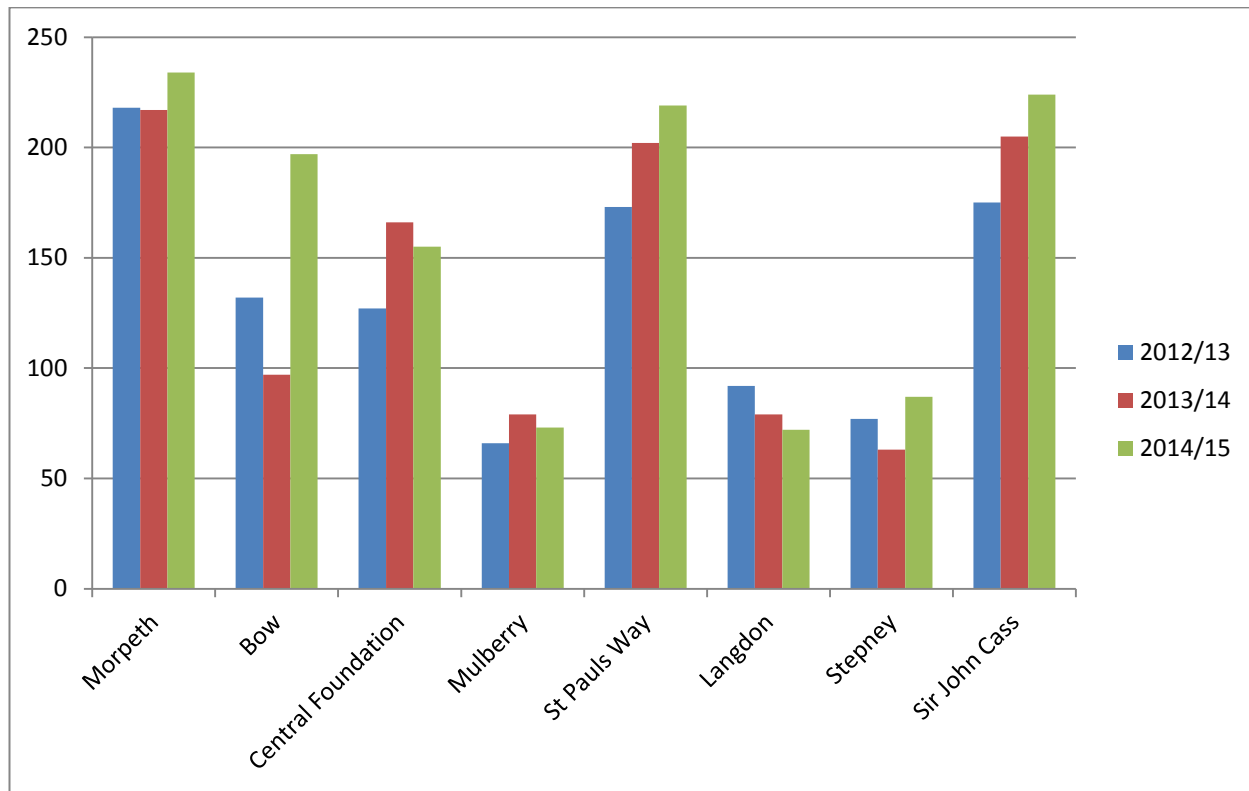




Appendix A, Table 3.8 – Applications to Bow School



**Table 3.9** - Applications to schools from Bow residents over the last three years



	Morpeth		Bow*		Central Foundation		Mulberry		St Pauls Way		Langdon		Stepney		Sir John Cass		Total Bow Resident pupils
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	
<b>2012/13</b>	218	48	132	29	127	28	66	15	173	38	92	20	77	17	175	39	<b>453</b>
<b>2013/14</b>	217	44	97	20	166	34	79	16	202	41	79	16	63	13	205	42	<b>488</b>
<b>2014/15</b>	234	49	197	41	155	32	73	15	219	46	72	15	87	18	224	47	<b>480</b>

Total applications from Bow Residents	
<b>2012/13</b>	<b>453</b>
<b>2013/14</b>	<b>488</b>
<b>2014/15</b>	<b>480</b>

**Appendix A - Table 3.10 – 3.16 (Mode of Travel Survey)  
Mode of Travel Area Catchment Area 1**

Mode of Travel to schools in Area 1	Under 500 m	Under 1 km	Under 2 km	Under 3 km	Under 5 km	Under 10 km	Over 10 km	Grand Total
Bicycle	14	4	2					20
Bus	31	19	56	38	7	1		152
Car	266	88	83	39	9	12	8	505
Carshare	11	1	4					16
Other	1			4				5
Rail	2	2		2	5	5	3	19
School Bus	8	6	15	11	11	1	1	53
Walk	2812	439	180	63	24	8	3	3529
<b>Grand Total</b>	<b>3145</b>	<b>559</b>	<b>340</b>	<b>157</b>	<b>56</b>	<b>27</b>	<b>15</b>	<b>4299</b>

*(Mode of Travel Survey, 2011)*

Table 3.11 Mobility of Travel  
Mode of Travel in Catchment Area 2

Mode of Travel to schools in Area 2	Under 500 m	Under 1 km	Under 2 km	Under 3 km	Under 5 km	Under 10 km	Over 10 km	Grand Total
Bicycle	10	13	3	1				27
Bus	19	9	20	8	3			59
Car	101	73	31	15	7	4	2	233
Carshare	3	3	1	3				10
Other		1	5					6
Rail	1	1					2	4
School Bus		1	1					2
Walk	1171	275	77	12	7	7	4	1553
<b>Grand Total</b>	<b>1305</b>	<b>376</b>	<b>138</b>	<b>39</b>	<b>17</b>	<b>11</b>	<b>8</b>	<b>1894</b>

*(Mode of Travel Survey, 2011)*

Table 3.12 Mobility of Travel  
Mode of Travel in Catchment Area 3

Mode of Travel to schools in Area 3	Under 500 m	Under 1 km	Under 2 km	Under 3 km	Under 5 km	Under 10 km	Over 10 km	Grand Total
Bicycle	1	1	1					3
Bus	4	8	31	9	1			53
Car	103	40	32	10	4	4	2	195
Carshare	2							2
Other	1	1	1					3
Rail	3	1	3	3	4	2		16
School Bus			1					1
Walk	1664	218	46	7	5	2	1	1943
<b>Grand Total</b>	<b>1778</b>	<b>269</b>	<b>115</b>	<b>29</b>	<b>14</b>	<b>8</b>	<b>3</b>	<b>2216</b>

(Mode of Travel Survey, 2011)

Table 3.13 Mobility of Travel  
Mode of Travel in Catchment Area 4

Mode of Travel to schools in Area 4	Under 500 m	Under 1 km	Under 2 km	Under 3 km	Under 5 km	Under 10 km	Over 10 km	Grand Total
Bicycle	2	6						8
Bus	16	24	35	16	2	1		94
Car	248	129	46	16	8	9	3	459
Carshare	4	1				1		6
Other	2	1						3
Rail	8	4	22	12	1	3	2	52
School Bus	2	3	12	9	6			32
Walk	1739	360	118	25	10	5	6	2263
<b>Grand Total</b>	<b>2021</b>	<b>528</b>	<b>233</b>	<b>78</b>	<b>27</b>	<b>19</b>	<b>11</b>	<b>2917</b>



*(Mode of Travel Survey, 2011)*

Table 3.14 Mobility of Travel  
Mode of Travel in Catchment Area 5

Mode of Travel to schools in Area 5	Under 500 m	Under 1 km	Under 2 km	Under 3 km	Under 5 km	Under 10 km	Over 10 km	Grand Total
Bicycle	13	4	4	1				22
Bus	21	24	44	28	5	1		123
Car	69	60	48	28	12	7	7	231
Carshare			1					1
Other	1		1					2
Rail	1		1			1		3
School Bus		1	2	1				4
Walk	753	197	65	18	14	1	1	1049
<b>Grand Total</b>	<b>858</b>	<b>286</b>	<b>166</b>	<b>76</b>	<b>31</b>	<b>10</b>	<b>8</b>	<b>1435</b>

*(Mode of Travel Survey, 2011)*

Table 3.15 Mobility of Travel  
Mode of Travel in Catchment Area 6

Mode of Travel to schools in Area 6	Under 500 m	Under 1 km	Under 2 km	Under 3 km	Under 5 km	Under 10 km	Over 10 km	Grand Total
Bicycle	9	1	1		1			12
Bus	21	8	30	24	34	2		119
Car	70	49	42	25	16	4	11	217
Carshare		1						1
Other	4	3	1		1			9
Rail	5			3	4	1	2	15
School Bus	2		1	6	57	2		68
Walk	1259	184	61	21	38	1		1564
<b>Grand Total</b>	<b>1370</b>	<b>246</b>	<b>136</b>	<b>79</b>	<b>151</b>	<b>10</b>	<b>13</b>	<b>2005</b>

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Table 3.16 Mobility of Travel  
Mode of Travel in Catchment Area 7

Mode of Travel to schools in Area 7	Under 500 m	Under 1 km	Under 2 km	Under 3 km	Under 5 km	Under 10 km	Over 10 km	Grand Total
Bicycle	6	1	3	1				11
Bus	11	7	31	32	32	11	1	125
Car	79	46	37	24	27	2	10	225
Carshare	1							1
Other	1	2	2	1				6
Rail			1	4		1	3	9
School Bus	2	1	2	10	31			46
Walk	1905	258	119	50	39	20	12	2403
<b>Grand Total</b>	<b>2005</b>	<b>315</b>	<b>195</b>	<b>122</b>	<b>129</b>	<b>34</b>	<b>26</b>	<b>2826</b>

(Mode of Travel Survey, 2011)

**Appendix A, Table 3.17 – Ethnicity for housing waiting list**

<b>Ethnicity</b>	<b>Number of people</b>	<b>% of people</b>
Asian	11,201	56.5 %
Black	2,385	12.0 %
Dual	497	2.5 %
White	4,504	22.7 %
Other	1,041	5.3 %
REFUSED	182	0.9 %
<b>Total:</b>	<b>19,810</b>	

(Housing Register as at 01 Dec 2014)

Current housing waiting list as of December 2014, break downed by ethnicity. Please note that the below recorded ethnicity groups are of the main applicant on a housing application only.

**Appendix B – School Admission Admissions 2016/17 - Consultation Survey Response**

**1.0 Introduction**

Tower Hamlets Council consulted the public on its school admission arrangements for 2016/17. The aim being to further improve the school admission arrangements for Tower Hamlets schools, so that they are fair and that as many parents as possible gain a place for their child at one of their preferred schools. The consultation covered the following:

**(i) Proposed Admissions Policies for Tower Hamlets community schools**

- Nursery School/Class Admissions Policy
- Oversubscription criteria for Nursery Schools and Classes
- Priority criteria for part-time and full-time places
- Primary Schools Admissions Policy
- Oversubscription criteria, including a change to the priority admission (catchment) areas for community school
- Secondary Schools Admissions Policy
- Oversubscription criteria

**(ii) Proposed coordinated schemes**

- For reception year of primary school
- For Year 7 of secondary school; and
- For admissions outside of normal points of entry ('In-Year')

**(iii) Planned admission number (PAN) for Tower Hamlets Schools**

The consultation was launched the 1<sup>st</sup> of November 2014 and ended on the 5<sup>th</sup> of January 2015. The consultation lasted for over 8 weeks.

**2.0 Communication**

The table below includes the communication methods used to advertise and promote the consultation.

Item	Communication Medium	Locality	Actioned
Director's Briefing for Governors	All Governors Governors were given notice about the impending consultation.	Director's Briefing Autumn Term Brochure	01/09/2014
Email to neighbouring boroughs	Neighbouring LAs		04/11/2014
Head teachers and school staff	Head Teachers Bulletin	To all Head Teachers	03/11/2014 01/12/2014
Advertising consultation on email signatures	Email signature for Pupil Admission and Impulse Team staff	Pupil Services Team	03/11/2014
Advertising consultation on School Admissions website /consultations webpage / news and event webpage	LBTH Website	Internet	03/11/2014
Consultation advert x 2	East End Life Newspaper Two adverts were placed at different intervals to allow maximum publicity.	Borough wide	03/11/2014 20/11/2014
Governing Bodies	Email to all governors via	Borough wide	01/11/2014

Item	Communication Medium	Locality	Actioned
	Governor Services – to remind governors to complete the consultation.		
Email to parent groups/network	Via Parent & Family Support Service – widely circulated for parents' access.	Parent network/newsletter	11/11/2014
Details of consultation advertised	Media Release	Borough wide	04/11/2014
Consultation meeting to discuss the proposed changes	Public Meeting – notice of meeting widely circulated through the above mediums	Professional Development Centre	26/11/2014
Children Centre Leads	Raise Awareness through publicity at Children's Centres. Children Centre to display notice in their public notice board.	Borough wide	17/11/2014
Ocean Somali Community Association	Governors / Somali Community reps – contacted OSCA directly to disseminate information.	information share	02/12/2014
Collective Of Bangladeshi Governors	Governors/ Bangladeshi community reps -- contacted CBSG directly to disseminate information.	information share	02/12/2014
Discussion on consultation held with Forum	Admissions Forum	Professional Development Centre	10/12/2014

### 3.0 Results

Despite the above methods to engage stakeholders, we have received four responses, all completed online. One response was from a parent, one was from a member of the public, one was from a governor (the school was not stated on the response), and one was classified as 'nothing selected'.

There was a collective response completed by the Tower Hamlets Admissions Forum and comments were also received from the City of London Admissions Forum.

The following analysis shows the outcome of the 4 and the Admissions Forums responses:

**1. Do you agree with the proposed arrangements for admission to Tower Hamlets Nursery Schools and classes in 2016/17, which aim to ensure that children attend their nearest school?** All respondents agreed with the proposed arrangements for TH Nursery Schools admissions 2016/17. The TH Admissions Forum agreed with the proposed arrangements and oversubscription criteria for admission to Nursery schools. There was no objection to this from the City of London Admissions Forum.

**2. Do you agree with the proposed arrangements and oversubscription criteria for admission to community primary schools?**

3 out of 4 respondents (75%) disagreed with the proposed arrangements and oversubscription criteria for admission to community primary schools. The TH Admissions Forum also agreed with the proposed arrangements and oversubscription criteria for admission to community primary schools. There was no objection to this from the City of London Admissions Forum.

**3. Do you agree with the proposed arrangements and oversubscription criteria for admission to community secondary schools in 2016/17?**

75% of respondents (3 people) agreed to proposed arrangements for oversubscription criteria for admission to community secondary schools in 2016/17. The TH Admissions Forum agreed with the proposed arrangements and oversubscription criteria for admission to community primary schools. There was no objection to this from the City of London Admissions Forum.

**4a. Do you agree with the Tower Hamlets scheme for co-ordinating year 7 and reception year admissions?**

3 of the 4 respondents (75%) agreed with TH’s scheme for coordinating year 7 and reception year admissions. The TH Admissions Forum agreed with the proposed arrangements and oversubscription criteria for admission to community primary schools. There was no objection to this from the City of London Admissions Forum.

**4b. Do you agree with the Tower Hamlets scheme for co-ordinating in-year admissions?**

75% of respondents (3 people) disagreed to the TH’s scheme for co-ordinating in-year admissions. The TH Admissions Forum commented on this and their comments are listed below.

**5a. Do you agree with the planned admission numbers (PAN) for Tower Hamlets schools in 2016/17?**

3 of the 4 respondents (75%) agreed to the PAN for TH schools in 2016/17. The TH Admissions Forum commented on this and their comments are listed below.

The following questions were for school governing bodies only, of which there was only one response.

**5b. Do you agree with the PAN for your school?**

All of the respondents agreed with their schools’ Planned Admission Number

**5c. Do you agree with the PAN for those schools whose admissions impact on your own school?**

All of the respondents agreed.

**4.0 Breakdown of survey responses in numbers (including the Admissions Forum)**

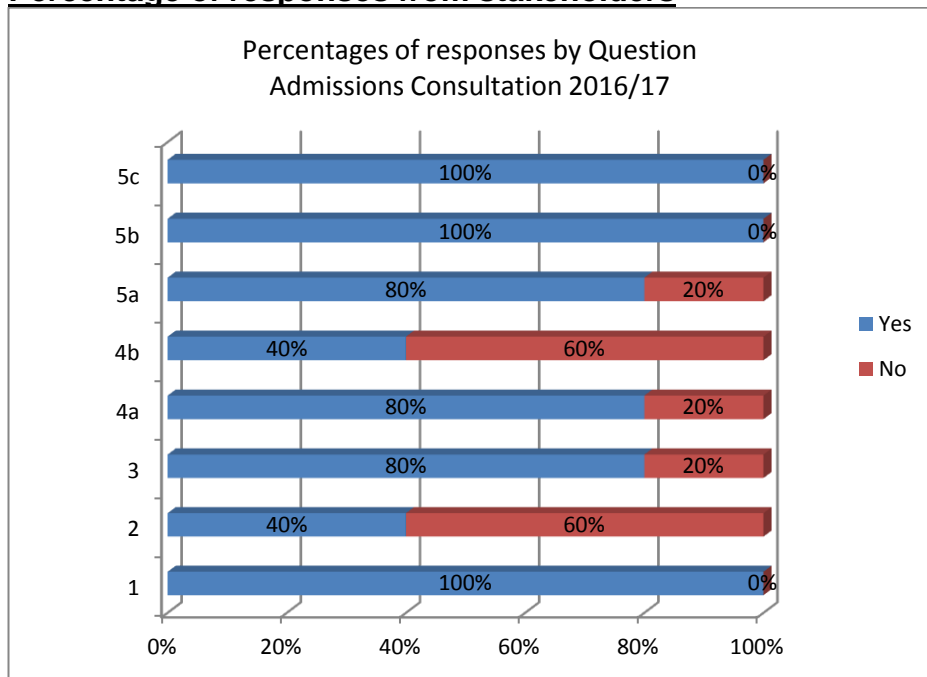
	Yes	No
<b>1. Do you agree with the proposed arrangements for admission to Tower Hamlets Nursery Schools and classes in 2016/17, which aim to ensure that children attend their nearest school?</b>	5	0
<b>2. Do you agree with the proposed arrangements and oversubscription criteria for admission to community primary schools?</b>	2	3
<b>3. Do you agree with the proposed arrangements and oversubscription criteria for admission to community secondary schools in 2016/17?</b>	4	1
<b>4a. Do you agree with the Tower Hamlets scheme for co-ordinating year 7 and reception year admissions?</b>	4	1
<b>4b. Do you agree with the Tower Hamlets scheme for co-ordinating in-year admissions?</b>	2	3
<b>5a. Do you agree with the planned admission numbers (PAN) for Tower Hamlets schools in 2016/17?</b>	4	1

	Yes	No
The next two questions are for school governing bodies only		
<b>5b. Do you agree with the PAN for your school?</b>	1	0
<b>5c. Do you agree with the PAN for those schools whose admissions impact on your own school?</b>	1	0

**Breakdown of responses in percentages**

	Yes	No
<b>1. Do you agree with the proposed arrangements for admission to Tower Hamlets Nursery Schools and classes in 2016/17, which aim to ensure that children attend their nearest school?</b>	100%	0%
<b>2. Do you agree with the proposed arrangements and oversubscription criteria for admission to community primary schools?</b>	40%	60%
<b>3. Do you agree with the proposed arrangements and oversubscription criteria for admission to community secondary schools in 2016/17?</b>	80%	20%
<b>4a. Do you agree with the Tower Hamlets scheme for co-ordinating year 7 and reception year admissions?</b>	80%	20%
<b>4b. Do you agree with the Tower Hamlets scheme for co-ordinating in-year admissions?</b>	40%	60%
<b>5a. Do you agree with the planned admission numbers (PAN) for Tower Hamlets schools in 2016/17?</b>	80%	20%
The next two questions are for school governing bodies only		
<b>5b. Do you agree with the PAN for your school?</b>	100%	0%
<b>5c. Do you agree with the PAN for those schools whose admissions impact on your own school?</b>	100%	0%

**Percentage of responses from stakeholders**



**4.1 Comments from survey**

Question	Respondent type	Comments
1	'Parent'	<p><i>'This is to ensure consistency in the way places are offered and, where possible, that children attend the same school for their nursery and primary education'</i></p> <p><i>I wholeheartedly support that statement and TRULY REGRET that it was not the policy in force when my child started nursery in 2013, she didn't get a place in reception in any of the 6 schools in her application leading to the horrendous appeal process, always a disappointment and a massive waste of energy for Parents. So hopefully the new policy will save young children the trouble to start all over again in another school and the parents the hassle of going through useless appeal procedure and travelling to new school, building new relationship with another school, getting new uniforms.</i></p>
2	'Parent'	<p><i>"Some applicants outside the catchment area live closer to the school applied for than other applicants who live within the catchment area, in this case priority should be given to the applicant living closer to school even if they don't live in the catchment area. The catchment area should be defined in concentric circle rather than using the ward map, it just doesn't make sense, what matters is not the ward boundaries but how far a child has to walk from home to school twice a day."</i></p>
4b	'Member of Public'	<p><i>This policy does not mention that priority is given to children out of school during the year above children who are waiting for a place in a school where they have a sibling but are presently in another school. This is wrong as it creates too much strain on families trying to get siblings to different schools. Priority should be given to children to move schools above those with no school place as ultimately the child who is waiting for a place in the same school as its sibling is will not be taking an additional space only creating one in a different school, which can then be filled by a child without a school place, assuming no other child is waiting for a place with a sibling in that school. That way more children will be placed together relieving the pressure on families, the</i></p>



		<p><i>school in looking after the child at the end of the day, reduce lateness, and reduce transport costs. As the number of spaces in the Borough ultimately remains the same, just as many children who are without a school place will be placed in a school, the only overall difference being that many children will be placed in the same school as their siblings. Please take this into account when you are determining your admissions policy. It does not mention any of this in the policy.”</i></p>
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**4.2 Response to comments**

1. This is a positive comment highlighting the intended effect of the new policy. The statement also gives an insight into the impact on families and the pressures the new policy alleviates.
2. Tower Hamlets has adopted the system of having fixed geographical catchment areas containing schools as oppose to each school having its own catchment area which is what the respondent is describing in the comment. The catchment areas do not follow ward boundaries. Natural barriers such as canals and major road have been used to define catchment area boundaries. The Catchment areas have also been designed to ensure the nearest school lies within the same catchment area, however it has to be noted that with new developments being completed this may not be the case for a small number of pupils in the future. The catchment areas will be continued to be monitored to ensure that it is achieving the best outcomes for families.
- 4b. Places for in-year admissions are in line with the admissions policy. However, there are instances where children admitted to a school, in accordance with the Fair Access Protocol, take precedence over those on a waiting list. These can often include children who are out of school. Pupil Services seeks to place children who are out of school, at a school at the earliest opportunity to ensure that children are receiving an education, and that the LA is meeting its statutory obligation and safeguarding duties. The comment above will be taken into consideration when reviewing the criterions in future.

**4.3 Response from Admissions Forums**

**Tower Hamlets Admissions Forum**

Whilst the Forum had agreed with the proposed admissions arrangements, they also made the following comments:

*4b – Diocesan Schools are advised they must comply with the agreed in-year arrangements, however individual schools may decide not to.*

*The Forum also requested that future year’s consultation should seek the views from the Phase Consultative groups.*

*5a – Despite planned expansions and developments notified, there is a request from the Forum for the development or expansion of the previous Bow School site to be brought forward and for school places to be given priority in all decisions.*

**City of London Admissions Forum**

The City of London Admission Forum did not complete the full questionnaire but have submitted comments related to secondary school priority zones, which can be accommodated under question 3.

**Question 3. Do you agree with the proposed arrangements and oversubscription criteria for admission to community secondary schools in 2016/17?**

**Response is in relation to the Tower Hamlets Priority Zones for secondary school:**  
 Priority Zone A, preference to Mulberry and Stepney Green Maths & Computing College  
 Priority Zone B, preference to Swanlea.

*“Thank you for giving us the opportunity to comment on Tower Hamlets school admissions arrangements.*

*Priority zones A and B are coterminous with Tower Hamlets borough boundary and do not extend into the City of London. We would be grateful if you could re-visit the priority area to include Middlesex Street and Mansell Street Estates.*

*The closest secondary schools for families on the east side of the City (Mansell Street and Middlesex Street estates) are located within Tower Hamlets.*

*There is a large Bangladeshi population within the two estates who are predominantly Muslims. Some families prefer their children to attend to attend single sex schools; Mulberry School for girls is the preferred choice for Bangladeshi girls.*

*The table below shows the number of successful applications to the three schools in the past 5 years.*

<i>Mulberry</i>	<i>Stepney Green Maths &amp; Computing College</i>	<i>Swanlea</i>
<i>2013 -14 (Sept 2014 entry):</i>  <i>Number of applications = 0</i>  <i>Number of successful applications = 0</i>	<i>2013 -14 (Sept 2014 entry):</i>  <i>Number of applications = 2 (all lower preferences)</i>  <i>Number of successful applications = 0</i>	<i>2013 -14 (Sept 2014 entry):</i>  <i>Number of applications = 2 (all lower preferences)</i>  <i>Number of successful applications = 1</i>
<i>2012 – 13 (Sept 2013 entry):</i>  <i>Number of applications = 4 (1 lower preference)</i>  <i>Number of successful applications = 3</i>	<i>2012 – 13 (Sept 2013 entry):</i>  <i>Number of applications = 3 (all lower preferences)</i>  <i>Number of successful applications = 0</i>	<i>2012 – 13 (Sept 2013 entry):</i>  <i>Number of applications = 1 (lower preference)</i>  <i>Number of successful applications = 0</i>
<i>2011 -12 (Sept 2012 entry):</i>	<i>2011 -12 (Sept 2012 entry):</i>	<i>2011 -12 (Sept 2012 entry):</i>

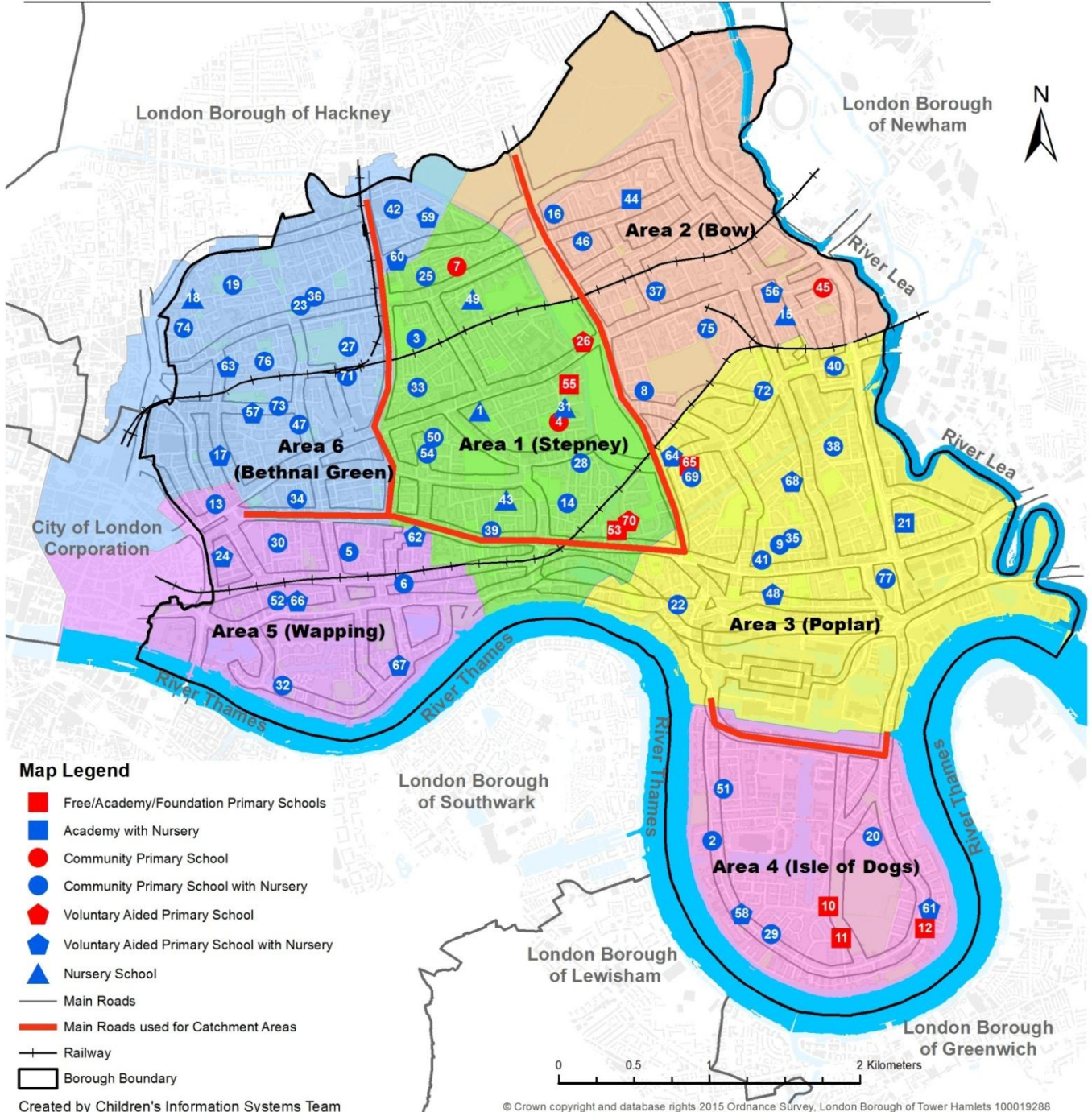
<p><i>Number of applications = 1</i></p> <p><i>Number of successful applications = 1</i></p>	<p><i>Number of applications = 0</i></p> <p><i>Number of successful applications = 0</i></p>	<p><i>Number of applications = 0</i></p> <p><i>Number of successful applications = 0</i></p>
<p><i>2010 -11 (Sept 2011 entry):</i></p> <p><i>Number of applications = 1</i></p> <p><i>Number of successful applications = 1</i></p>	<p><i>2010 -11 (Sept 2011 entry):</i></p> <p><i>Number of applications = 2</i> <i>1 (Lower preference)</i></p> <p><i>Number of successful applications = 1</i></p>	<p><i>2010 -11 (Sept 2011 entry):</i></p> <p><i>Number of applications = 1</i> <i>(Lower preference)</i></p> <p><i>Number of successful applications = 0</i></p>
<p><i>2009 -10 (Sept 2010 entry):</i></p> <p><i>Number of applications = 2</i> <i>(1 lower preference)</i></p> <p><i>Number of successful applications = 1</i></p>	<p><i>2009 -10 (Sept 2010 entry):</i></p> <p><i>Number of applications = 0</i></p> <p><i>Number of successful applications = 0</i></p>	<p><i>2009 -10 (Sept 2010 entry):</i></p> <p><i>Number of applications = 0</i></p> <p><i>Number of successful applications = 0</i></p>

*As you can see the numbers of applications to the three schools are very small. City residents who have expressed their first preference at any of the three schools were successful in getting places even though they are out of the priority zone. Therefore I am sure you'll agree that including the two estates in the priority zone will not add additional pressure on school places.*

**Appendix C – Primary admissions catchment area with major roads and railways**

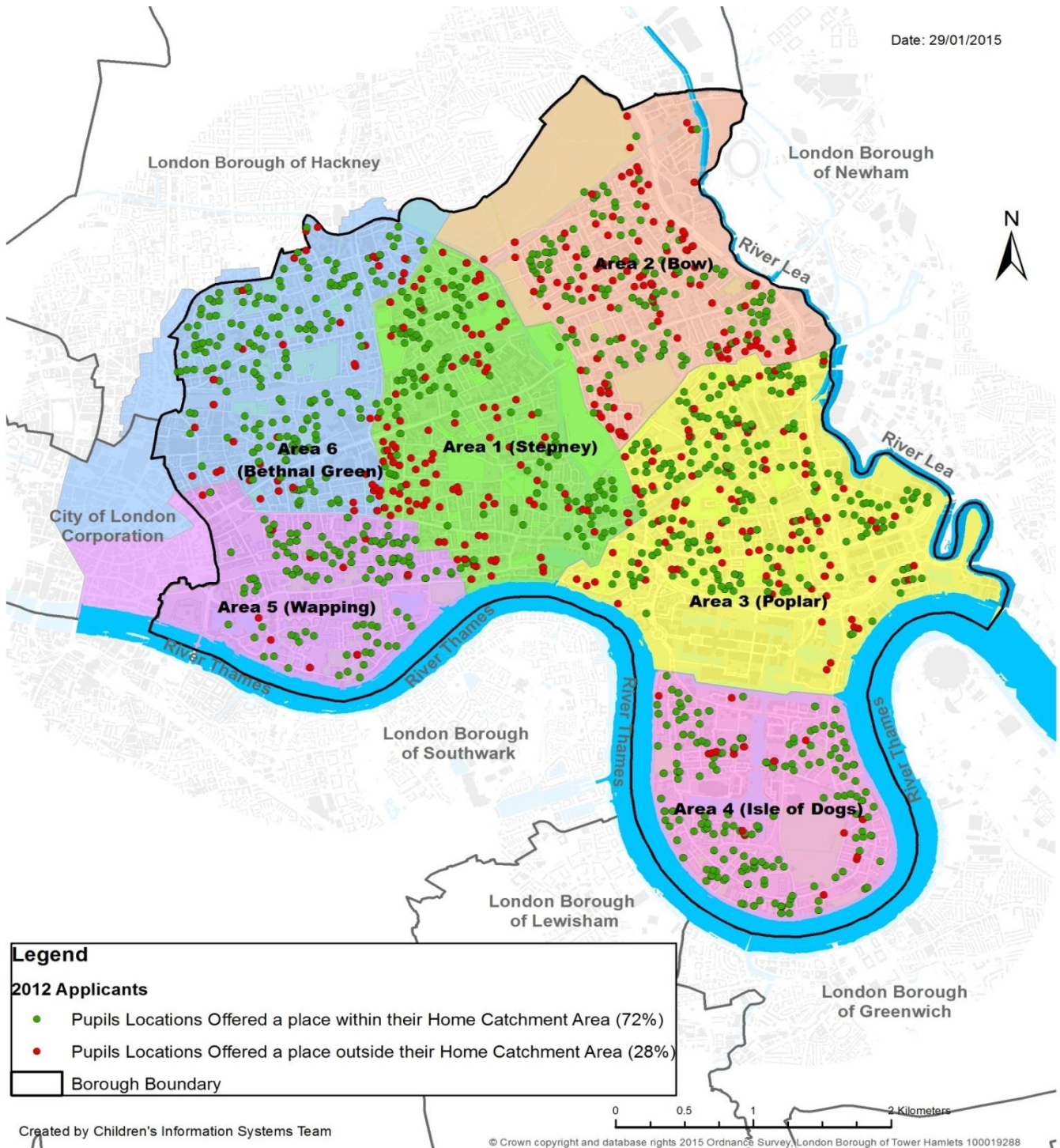
Date: 30/01/2015

1 Alice Model	16 Chisenhale	31 Harry Roberts	47 Osmani	62 St Mary's & St Michael's
2 Arnhem Wharf	17 Christ Church CofE	32 Hermitage	48 Our Lady & St Joseph	63 St Matthias CofE
3 Bangab&hu	18 Columbia Market	33 John Scurr	49 Rachel Keeling	64 St Paul with St Luke CofE
4 Ben Jonson	19 Columbia	34 Kobi Nazrul	50 Redlands	65 St Paul's Way Foundation
5 Bigland Green	20 Cubitt Town Infants	35 Lansbury Lawrence	51 Seven Mills	66 St Paul's Whitechapel CofE
6 Blue Gate Fields Infants	21 Cubitt Town Junior	36 Lawdale Junior	52 Shapla	67 St Peter's London Docks CofE
6 Blue Gate Fields Junior	21 Culloden	37 Malmesbury	53 Sir William Burrough	68 St Saviour's CofE
7 Bonner (Bethnal Green)	22 Cyril Jackson	38 Manorfield	54 Smithy	69 Stebon
8 Bonner (Mile End)	23 Elizabeth Selby Infants	39 Marion Richardson	55 Solebay (formerly CET) Primary School	70 Stepney Greencoat CofE
9 Bygrove	24 English Martyrs RC	40 Marner	56 St Agnes RC	71 Stewart Headlam
10 Canary Wharf College 3	25 Globe	41 Mayflower	57 St Anne RC	72 The Clara Grant
11 Canary Wharf College East Ferry	26 Guardian Angels RC	42 Mowlem	58 St Edmund RC	73 Thomas Buxton
12 Canary Wharf College Glenworth	27 Hague	43 Old Church	59 St Elizabeth's RC	74 Virginia
13 Canon Barnett	28 Halley	44 Old Ford	60 St John's CofE	75 Wellington
14 Cayley	29 Harbinger	45 Old Palace	61 St Luke's CofE	76 William Davis
15 Childrens House	30 Harry Gosling	46 Olga		77 Woolmore



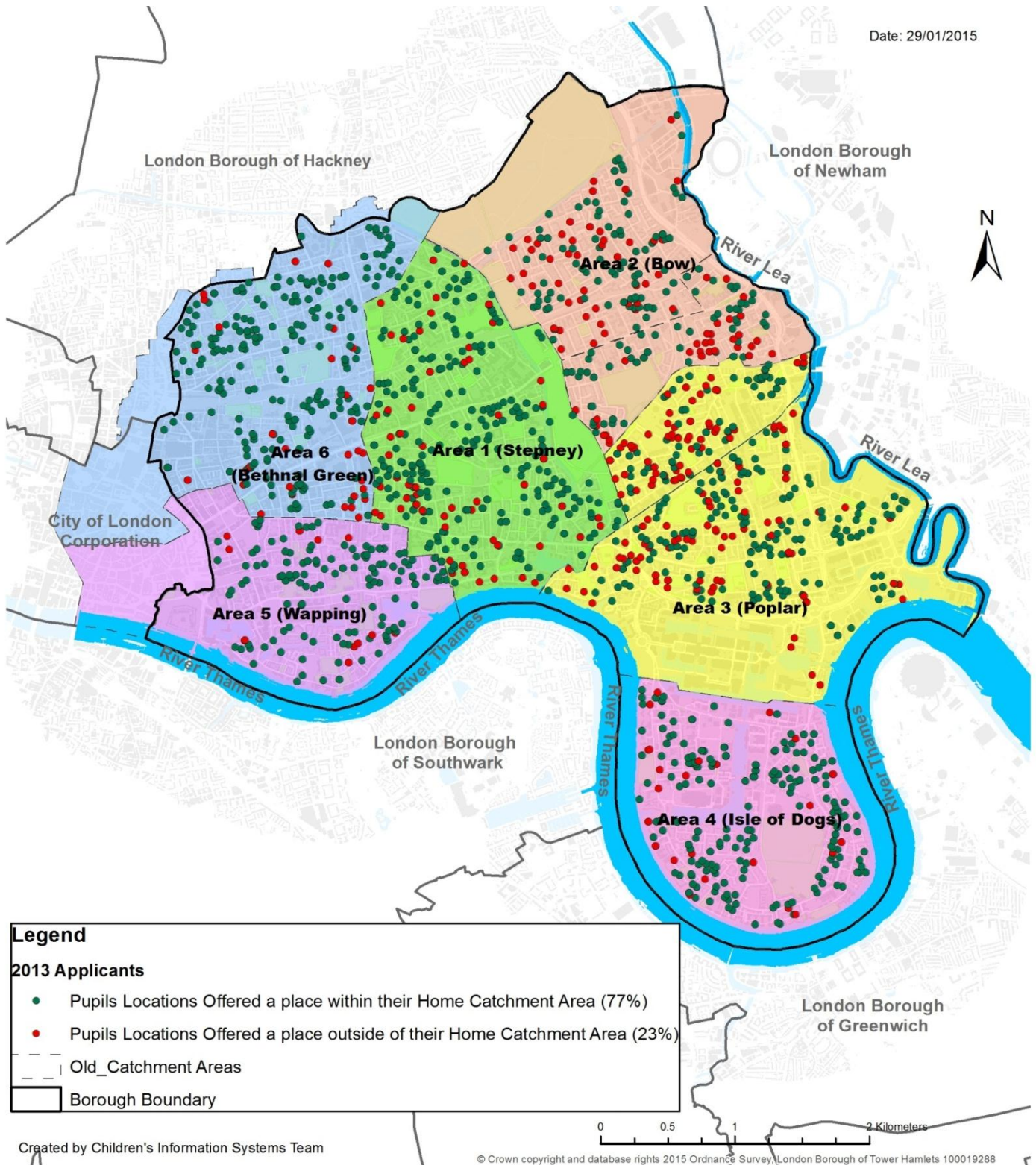
Appendix D – Pattern of applications before catchment area policy 2012/13

Date: 29/01/2015



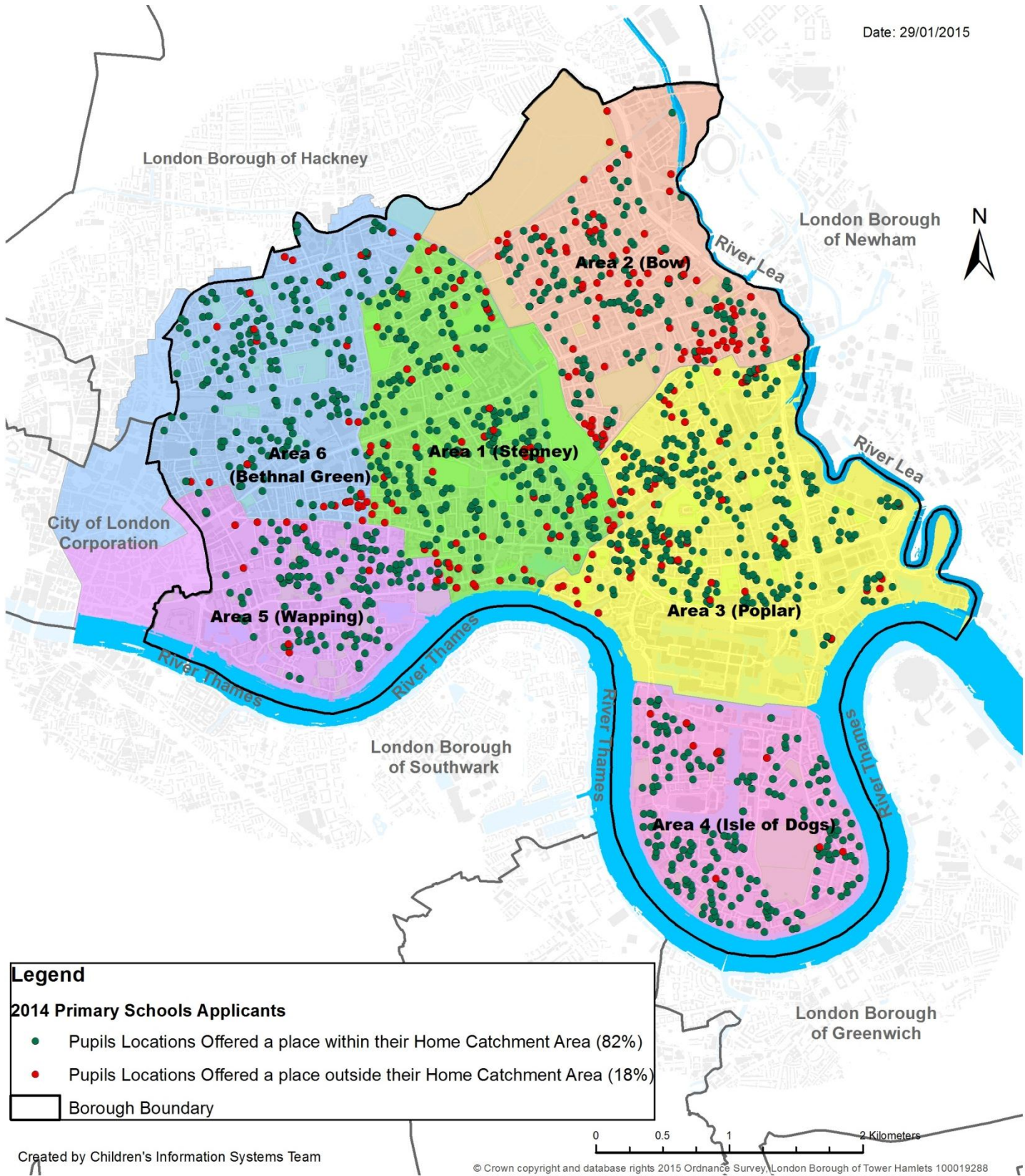
Pattern of applications 1<sup>st</sup> year of catchment area implementation  
2013/14

Date: 29/01/2015



Pattern of applications 2<sup>nd</sup> year of catchment area implementation  
2014/15

Date: 29/01/2015



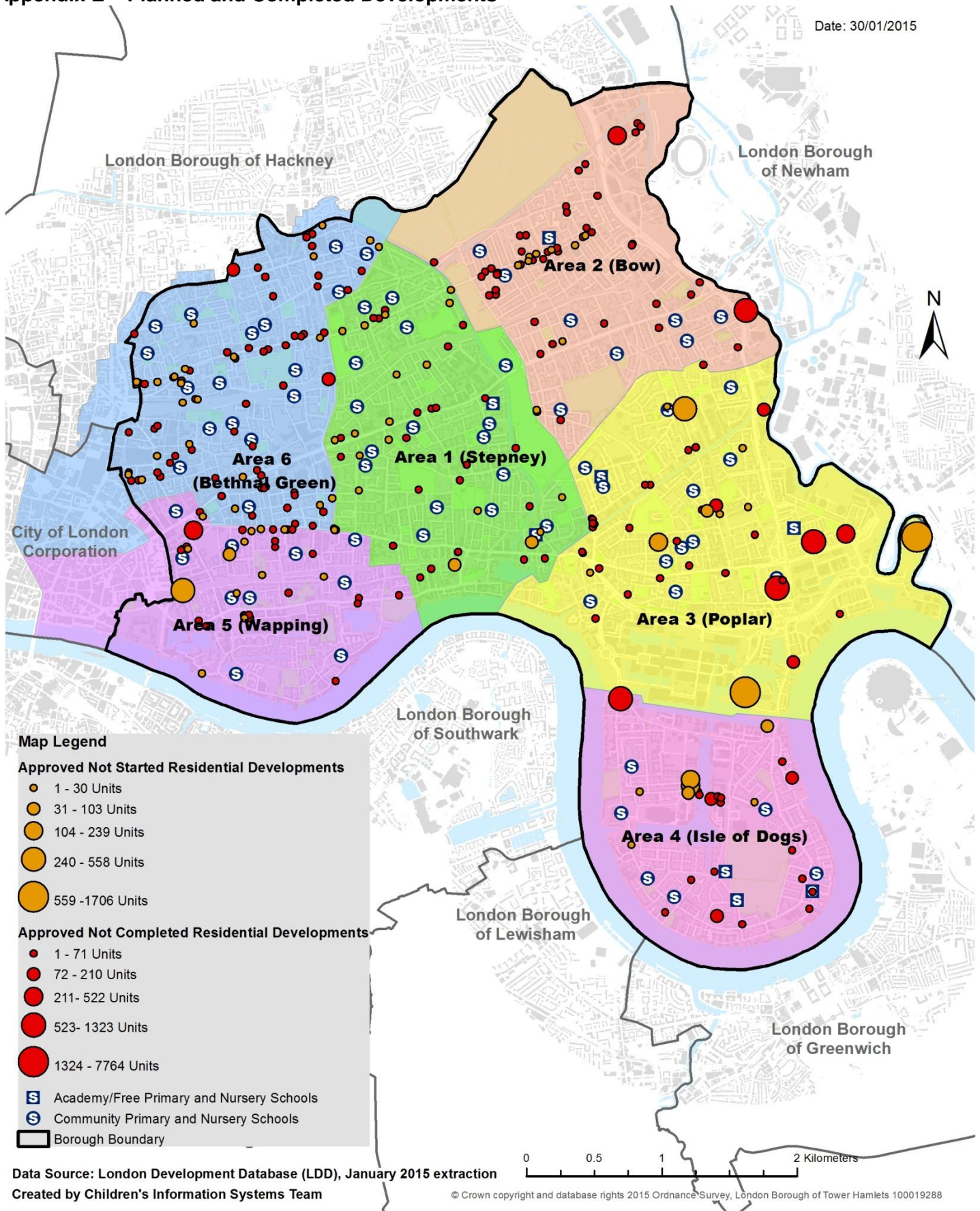
**Appendix D, Table 1 Places offered within catchment area and outside of catchment area 2012-2014**

	Within Catchment Area	Outside Catchment Area
2012/13 applications	72%	28%
2013/14 applications	77%	23%
2014/15 applications	82%	18%



Appendix E – Planned and Completed Developments

Date: 30/01/2015



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