

# CABINET

## MAYOR

Mayor John Biggs

## CABINET MEMBERS

Councillor Sirajul Islam	(Statutory Deputy Mayor and Cabinet Member for Housing)
Councillor Rachel Blake	(Deputy Mayor and Cabinet Member for Planning, Air Quality and Tackling Poverty)
Councillor Asma Begum	(Deputy Mayor and Cabinet Member for Community Safety and Equalities)
Councillor Sabina Akhtar	(Cabinet Member for Culture, Arts and Brexit)
Councillor Amina Ali	(Cabinet Member for Adults, Health and Wellbeing)
Councillor David Edgar	(Cabinet Member for Environment)
Councillor Danny Hassell	(Cabinet Member for Children, Schools and Young People)
Councillor Candida Ronald	(Cabinet Member for Resources and the Voluntary Sector)
Councillor Motin Uz-Zaman	(Cabinet Member for Work and Economic Growth)

[The quorum for Cabinet is 3 Members]

## MEETING DETAILS

**Wednesday, 31 July 2019 at 5.30 p.m.**

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

**The meeting is open to the public to attend.**

## Further Information

The public are welcome to attend meetings of the Cabinet. Procedures relating to Public Engagement are set out in the 'Guide to Cabinet' attached to this agenda.

### **Contact for further enquiries:**

Matthew Mannion, Democratic Services,  
1st Floor, Town Hall, Mulberry Place, 5 Clove Crescent, London,  
E14 2BG

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Web: <http://www.towerhamlets.gov.uk>

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## Public Information

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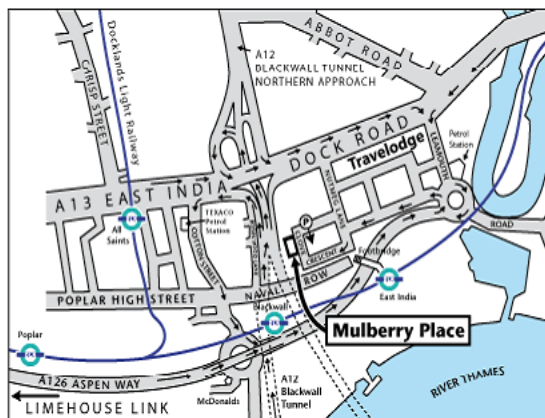
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To access this, click [www.towerhamlets.gov.uk/committee](http://www.towerhamlets.gov.uk/committee) and search for the relevant committee and meeting date.

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## **A Guide to CABINET**

### **Decision Making at Tower Hamlets**

As Tower Hamlets operates the Directly Elected Mayor system, **Mayor John Biggs** holds Executive powers and takes decisions at Cabinet or through Individual Mayoral Decisions. The Mayor has appointed nine Councillors to advise and support him and they, with him, form the Cabinet. Their details are set out on the front of the agenda.

### **Which decisions are taken by Cabinet?**

Executive decisions are all decisions that aren't specifically reserved for other bodies (such as Development or Licensing Committees). In particular, Executive Key Decisions are taken by the Mayor either at Cabinet or as Individual Mayoral Decisions.

The constitution describes Key Decisions as an executive decision which is likely

- a) to result in the local authority incurring expenditure which is, or the making of savings which are, significant having regard to the local authority's budget for the service or function to which the decision relates; or
- b) to be significant in terms of its effects on communities living or working in an area comprising two or more wards in the borough.

Upcoming Key Decisions are published on the website on the 'Forthcoming Decisions' page through [www.towerhamlets.gov.uk/committee](http://www.towerhamlets.gov.uk/committee)

### **Published Decisions and Call-Ins**

Once the meeting decisions have been published, any 5 Councillors may submit a Call-In to the Service Head, Democratic Services requesting that a decision be reviewed. This halts the decision until it has been reconsidered.

- The decisions will be published on: **Friday, 2 August 2019**
- The deadline for call-ins is: **Friday, 9 August 2019**

Any Call-Ins will be considered at the next meeting of the Overview and Scrutiny Committee. The Committee can reject the call-in or they can agree it and refer the decision back to the Mayor, with their recommendations, for his final consideration.

### **Public Engagement at Cabinet**

The main focus of Cabinet is as a decision-making body. However there is an opportunity for the public to contribute through making submissions that specifically relate to the reports set out on the agenda.

Members of the public may make written submissions in any form (for example; Petitions, letters, written questions) to the Clerk to Cabinet (details on the front page) by 5 pm the day before the meeting.

**LONDON BOROUGH OF TOWER HAMLETS**

**CABINET**

**WEDNESDAY, 31 JULY 2019**

**5.30 p.m.**

	<b>Pages</b>
<b>1. APOLOGIES FOR ABSENCE</b>	
To receive any apologies for absence.	
<b>2. DECLARATIONS OF DISCLOSABLE PECUNIARY INTERESTS</b>	<b>11 - 14</b>
To note any declarations of interest made by Members, including those restricting Members from voting on the questions detailed in Section 106 of the Local Government Finance Act, 1992. See attached note from the Monitoring Officer.	
<b>3. UNRESTRICTED MINUTES</b>	<b>15 - 24</b>
The unrestricted minutes of the Cabinet meeting held on Wednesday 26 June 2019 are presented for approval.	
<b>4. ANNOUNCEMENTS (IF ANY) FROM THE MAYOR</b>	
<b>5. OVERVIEW &amp; SCRUTINY COMMITTEE</b>	
<b>5.1 Chair's Advice of Key Issues or Questions</b>	
Chair of Overview and Scrutiny Committee (OSC) to report on any issues raised by the OSC in relation to unrestricted business to be considered.	
<b>5.2 Any Unrestricted Decisions "Called in" by the Overview &amp; Scrutiny Committee</b>	
(Under provisions of Article 6 Para 6.02 V of the Constitution).	

## 6. UNRESTRICTED REPORTS FOR CONSIDERATION

<b>6 .1</b>	<b>Outcome of recent Ofsted Inspection of Local Authority Children's Services (ILACS)</b>	<b>25 - 44</b>
<p><b>Report Summary:</b> Children's Services were inspected between the 3rd and the 21st June 2019. This inspection followed an inspection in early 2017 where Children's Services were rated as inadequate. This most recent inspection considered the improvements that have been made to services over the past two years.</p> <p>The result of the inspection was the Children's Services in Tower Hamlets are now rated as GOOD. The grade above inadequate is Requires Improvement so this rating represents a significant improvement. This report will outline some of the key highlights from the inspection report.</p> <p><b>Wards:</b> All Wards <b>Lead Member:</b> Cabinet Member for Children, Schools and Young People <b>Corporate Priority:</b> TH Plan 1: A better deal for children and young people: aspiration, education and skills</p>		

<b>6 .2</b>	<b>Local Community Fund</b>	<b>45 - 192</b>
<p><b>Report Summary:</b> This report makes recommendations for awarding funding to voluntary and community sector (VCS) organisations through the Local Community Fund programme.</p> <p>It summarised the co-production of the programme with the voluntary and community sector, sets out the bidding process, analyses the bids received, describes the proposed new funding programme and makes proposals to mitigate disproportionate equalities impact.</p> <p>The report also considers the impact on services which are currently funded through the Mainstream Grants programme.</p> <p><b>Wards:</b> All Wards <b>Lead Member:</b> Cabinet Member for Resources and the Voluntary Sector, Mayor <b>Corporate Priority:</b> A borough that our residents are proud of and love to live in</p>		

**6 .3 Strategic Review of Tower Hamlets Homes** **193 - 300**

**Report Summary:**

Following a strategic review of Tower Hamlets Homes (THH) the Arms length Management Organisation currently managing the Councils housing stock, this report recommends future housing management arrangements beyond July 2020 when the THH management agreement ends.

**Wards:** All Wards  
**Lead Member:** Statutory Deputy Mayor and Cabinet Member for Housing  
**Corporate Priority:** A borough that our residents are proud of and love to live in

**6 .4 Air Quality Action Plan Update on Progress** **301 - 422**

**Report Summary:**

A review of progress on achievements made towards compliance with the Council's Air Quality Action Plan.

**Wards:** All Wards  
**Lead Member:** Deputy Mayor and Cabinet Member for Regeneration and Air Quality  
**Corporate Priority:** A borough that our residents are proud of and love to live in

**6 .5 Local Biodiversity Action Plan 2019-2024** **423 - 478**

**Report Summary:**

The current Local Biodiversity Action Plan (LBAP) expires at the end of September 2019. This report includes the new Local Biodiversity Action Plan 2019-2024.

Decision required:  
Approve the Local Biodiversity Action Plan 2019-24

**Wards:** All Wards  
**Lead Member:** Cabinet Member for Environment  
**Corporate Priority:** A borough that our residents are proud of and love to live in

**6 .6 Children and Families Strategy 2019-2024 479 - 512**

**Report Summary:**

This item outlines the strategic direction which the Children and Families Partnership has committed to over the next five years and includes information about the Learning and Achievement Strategy for 14 to 25 year olds 2019 – 2023 which aligns with one of the three priorities within the Children and Families Strategy

**Wards:** All Wards  
**Lead Member:** Cabinet Member for Children, Schools and Young People  
**Corporate Priority:** People are aspirational, independent and have equal access to opportunities

**6 .7 Response to Overview and Scrutiny Committee's Challenge Session recommendations: Communications 513 - 522**

**Report Summary:**

To respond to Overview & Scrutiny Committee's Challenge Session recommendations on the Council's Communication

**Wards:** All Wards  
**Lead Member:** Mayor  
**Corporate Priority:** A borough that our residents are proud of and love to live in

**6 .8 Proposed additions to the local list 523 - 590**

**Report Summary:**

A proposal to add forty-one buildings to the council's local list.

**Wards:** Bethnal Green; Blackwall & Cubitt Town; Bow East; Bow West; Bromley North; Bromley South; Island Gardens; Poplar; Shadwell; Spitalfields & Banglatown; St Dunstan's; St Katharine's & Wapping; St Peter's; Weavers; Whitechapel  
**Lead Member:** Deputy Mayor and Cabinet Member for Planning, Air Quality and Tackling Poverty  
**Corporate Priority:** All Priorities

**6 .9 Revised Commercial Property Lettings and Disposals Procedure 591 - 630**

**Report Summary:**

Following an internal audit of disposals procedures in 2017, and a need to update letting processes to reflect professional best practice, a major revision has taken place to the above document, used as guidance to council officers employed within the Asset Management Team.

**Wards:** All Wards  
**Lead Member:** Mayor  
**Corporate Priority:** All Priorities

<b>6 .10 Land to the West of Virginia Street -London Docks School</b>	<b>631 - 638</b>
<p><b>Report Summary:</b> This report seeks the formal approval for the Council to enter into a lease and grant a sub-lease to a school provider to enable a school to be built and occupied.</p> <p><b>Wards:</b> St Katharine's &amp; Wapping <b>Lead Member:</b> Mayor <b>Corporate Priority:</b> All Priorities</p>	

<b>6 .11 Angela Court, Burdett Road; Lease to Mulberry Housing Society</b>	<b>639 - 648</b>
<p><b>Report Summary:</b> The report proposes that the Council grants a lease of Angela Court, Burdett Road to Mulberry Housing Society (MHS) on the terms set out, under which MHS will operate the building as affordable housing.</p> <p><b>Wards:</b> Mile End <b>Lead Member:</b> Statutory Deputy Mayor and Cabinet Member for Housing <b>Corporate Priority:</b> All Priorities</p>	

<b>6 .12 Revenue and Capital Budget Monitoring Quarter 1 2019/20</b>	<b>649 - 686</b>
<p><b>Report Summary:</b> This report details the Quarter 1 (June 2019) monitoring position against the approved budget for the Revenue and Capital Spend for the financial year end 2019/20.</p> <p>It also includes information of the councils progress against its saving targets, strategies for reducing overspends and a number of general financial health indicators.</p> <p><b>Wards:</b> All Wards <b>Lead Member:</b> Cabinet Member for Resources and the Voluntary Sector <b>Corporate Priority:</b> All Priorities</p>	



**Report Summary:**

A refresh of the Council’s Outcomes Based Budgeting approach to prioritising resources over the Medium Term Financial Strategy from 2020-21 to 2022-23.

Setting out issues and actions which inform the development of the Council’s MTFS for 2020-2023 to include timescales and next steps.

**Wards:** All Wards  
**Lead Member:** Cabinet Member for Resources and the Voluntary Sector  
**Corporate Priority:** A dynamic outcomes-based Council using digital innovation and partnership working

**Report Summary:**

It is the responsibility of the Mayor to nominate representatives to certain Outside Bodies on behalf of Tower Hamlets Council. The report will propose appointments to Outside Bodies for the Mayor to consider.

**Wards:** All Wards  
**Lead Member:** Mayor  
**Corporate Priority:** A dynamic outcomes-based Council using digital innovation and partnership working

**7. ANY OTHER UNRESTRICTED BUSINESS CONSIDERED TO BE URGENT**

**8. EXCLUSION OF THE PRESS AND PUBLIC**

Should the Mayor in Cabinet consider it necessary, it is recommended that the following motion be adopted to allow consideration of any exempt/restricted documents.

“That, under the provisions of Section 100A of the Local Government Act, 1972 as amended by the Local Government (Access to Information) Act, 1985, the Press and Public be excluded from the remainder of the meeting for the consideration of the Section Two business on the grounds that it contains information defined as Exempt in Part 1 of Schedule 12A to the Local Government, Act 1972”.

**EXEMPT/CONFIDENTIAL SECTION (PINK)**

The Exempt / Confidential (Pink) Committee papers in the Agenda will contain information, which is commercially, legally or personally sensitive and should not be divulged to third parties. If you do not wish to retain these papers after the meeting, please hand them to the Committee Officer present.

## 9. EXEMPT / CONFIDENTIAL MINUTES

Nil items.

## 10. OVERVIEW & SCRUTINY COMMITTEE

### 10.1 Chair's Advice of Key Issues or Questions in Relation to Exempt / Confidential Business

Chair of Overview and Scrutiny Committee (OSC) to report on any issues raised by the OSC in relation to exempt/confidential business to be considered.

### 10.2 Any Exempt / Confidential Decisions "Called in" by the Overview & Scrutiny Committee

(Under provisions of Article 6 Para 6.02 V of the Constitution).

## 11. EXEMPT / CONFIDENTIAL REPORTS FOR CONSIDERATION

### 11.1 Poplar Baths - Refinancing

723 - 770

#### **Report Summary:**

The senior financing debt arranged for the Poplar Baths project is due to mature in 2019, prompting a refinancing exercise to be carried out by the Project Company.

A number of options are being explored to ensure that the Council's interests are protected in the refinancing exercise and this includes the exploration of the Council providing the senior debt to the project.

**Wards:** Bethnal Green; Poplar

**Lead Member:** Cabinet Member for Resources and the Voluntary Sector

**Corporate Priority:** A dynamic outcomes-based Council using digital innovation and partnership working

## 12. ANY OTHER EXEMPT/ CONFIDENTIAL BUSINESS CONSIDERED TO BE URGENT

#### **Next Meeting of the Committee:**

Wednesday, 25 September 2019 at 5.30 p.m. in C1, 1st Floor, Town Hall, Mulberry Place, 5 Clove Crescent, London, E14 2BG

# Agenda Item 2

## **DECLARATIONS OF INTERESTS - NOTE FROM THE MONITORING OFFICER**

This note is for guidance only. For further details please consult the Members' Code of Conduct at Part C of the Council's Constitution.

Please note that the question of whether a Member has an interest in any matter, and whether or not that interest is a Disclosable Pecuniary Interest, is for that Member to decide. Advice is available from officers as listed below but they cannot make the decision for the Member. If in doubt as to the nature of an interest it is advisable to seek advice **prior** to attending a meeting.

### **Interests and Disclosable Pecuniary Interests (DPIs)**

You have an interest in any business of the authority where that business relates to or is likely to affect any of the persons, bodies or matters listed in the Code of Conduct; and might reasonably be regarded as affecting the well-being or financial position of yourself, a member of your family or a person with whom you have a close association, to a greater extent than the majority of other council tax payers, ratepayers or inhabitants of the ward affected.

You must notify the Monitoring Officer in writing of any such interest, for inclusion in the Register of Members' Interests which is available for public inspection and on the Council's Website.

Once you have recorded an interest in the Register, you are not then required to declare that interest at each meeting where the business is discussed, unless the interest is a Disclosable Pecuniary Interest (DPI).

A DPI is defined in Regulations as a pecuniary interest of any of the descriptions listed at **Appendix A** overleaf. Please note that a Member's DPIs include his/her own relevant interests and also those of his/her spouse or civil partner; or a person with whom the Member is living as husband and wife; or a person with whom the Member is living as if they were civil partners; if the Member is aware that that other person has the interest.

### **Effect of a Disclosable Pecuniary Interest on participation at meetings**

Where you have a DPI in any business of the Council you must, unless you have obtained a dispensation from the authority's Monitoring Officer following consideration by the Dispensations Sub-Committee of the Standards Advisory Committee:-

- not seek to improperly influence a decision about that business; and
- not exercise executive functions in relation to that business.

If you are present at a meeting where that business is discussed, you must:-

- Disclose to the meeting the existence and nature of the interest at the start of the meeting or when the interest becomes apparent, if later; and
- Leave the room (including any public viewing area) for the duration of consideration and decision on the item and not seek to influence the debate or decision

When declaring a DPI, Members should specify the nature of the interest and the agenda item to which the interest relates. This procedure is designed to assist the public's understanding of the meeting and to enable a full record to be made in the minutes of the meeting.

Where you have a DPI in any business of the authority which is not included in the Member's register of interests and you attend a meeting of the authority at which the business is considered, in addition to disclosing the interest to that meeting, you must also within 28 days notify the Monitoring Officer of the interest for inclusion in the Register.

**Further advice**

For further advice please contact:-

Asmat Hussain, Corporate Director, Governance and Monitoring Officer. Tel 020 7364 4800

## APPENDIX A: Definition of a Disclosable Pecuniary Interest

(Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012, Reg 2 and Schedule)

Subject	Prescribed description
Employment, office, trade, profession or vacation	Any employment, office, trade, profession or vocation carried on for profit or gain.
Sponsorship	<p>Any payment or provision of any other financial benefit (other than from the relevant authority) made or provided within the relevant period in respect of any expenses incurred by the Member in carrying out duties as a member, or towards the election expenses of the Member.</p> <p>This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.</p>
Contracts	<p>Any contract which is made between the relevant person (or a body in which the relevant person has a beneficial interest) and the relevant authority—</p> <p>(a) under which goods or services are to be provided or works are to be executed; and</p> <p>(b) which has not been fully discharged.</p>
Land	Any beneficial interest in land which is within the area of the relevant authority.
Licences	Any licence (alone or jointly with others) to occupy land in the area of the relevant authority for a month or longer.
Corporate tenancies	<p>Any tenancy where (to the Member's knowledge)—</p> <p>(a) the landlord is the relevant authority; and</p> <p>(b) the tenant is a body in which the relevant person has a beneficial interest.</p>
Securities	<p>Any beneficial interest in securities of a body where—</p> <p>(a) that body (to the Member's knowledge) has a place of business or land in the area of the relevant authority; and</p> <p>(b) either—</p> <p>(i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or</p> <p>(ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.</p>

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**LONDON BOROUGH OF TOWER HAMLETS**

**MINUTES OF THE CABINET**

**HELD AT 5.35 P.M. ON WEDNESDAY, 26 JUNE 2019**

**C1, 1ST FLOOR, TOWN HALL, MULBERRY PLACE, 5 CLOVE CRESCENT,  
LONDON, E14 2BG**

**Members Present:**

Mayor John Biggs	
Councillor Sirajul Islam	(Statutory Deputy Mayor and Cabinet Member for Housing)
Councillor Rachel Blake	(Deputy Mayor and Cabinet Member for Planning, Air Quality and Tackling Poverty)
Councillor Sabina Akhtar	(Cabinet Member for Culture, Arts and Brexit)
Councillor Amina Ali	(Cabinet Member for Adults, Health and Wellbeing)
Councillor David Edgar	(Cabinet Member for Environment)
Councillor Candida Ronald	(Cabinet Member for Resources and the Voluntary Sector)
Councillor Motin Uz-Zaman	(Cabinet Member for Work and Economic Growth)

**Other Councillors Present:**

Councillor Sufia Alam	
Councillor Peter Golds	
Councillor Andrew Wood	(Leader of the Conservative Group)

**Apologies:**

Councillor Asma Begum	(Deputy Mayor and Cabinet Member for Community Safety and Equalities)
Councillor Danny Hassell	(Cabinet Member for Children, Schools and Young People)

**Others Present:**

Vivianne Akinremi	Deputy Young Mayor and Cabinet Member for Health and Wellbeing
Jaami Barry	(Young Mayor of Tower Hamlets)
Ahmed Duale	(Deputy Young Mayor of Tower Hamlets and Youth Cabinet Member for Environment)
Nadia Hussein	(Deputy Young Mayor of Tower Hamlets and Youth Cabinet Member for Community)
Muhsin Mahmud	(Deputy Young Mayor of Tower Hamlets and Youth Cabinet Member for Communications)

**Officers Present:**

Andrew Bate	(Senior Executive, Communications)
Mark Baigent	(Interim Divisional Director, Housing and

Stephen Bramah	Regeneration) (Deputy Head of the Mayor's office)
David Courcoux	(Head of the Mayor's Office)
Sharon Godman	(Divisional Director, Strategy, Policy and Performance)
Asmat Hussain	(Corporate Director, Governance and Monitoring Officer)
Debbie Jones	(Corporate Director, Children and Culture)
Ralph Million	(Senior Strategic Asset Manager, Place)
Neville Murton	Corporate Director, Resources)
Denise Radley	(Corporate Director, Health, Adults & Community)
Amy Sherman	(Strategy and Policy Officer)
Ann Sutcliffe	(Corporate Director, Place)
Will Tuckley	(Chief Executive)
Matthew Vaughan	(Political Advisor to the Conservative Group, Democratic Services, LPG)
Charles Griggs	(Head of Community Safety)
Matthew Mannion	(Head of Democratic Services, Governance)
Rushena Miah	(Committee Services Officer)
Nnenna Onochie-Oputa	(Modern.gov Project Officer)

## **AGENDA ORDER**

During the meeting the Mayor agreed to vary the order of business to take Agenda Item 6.1 (Spitalfields and Banglatown Community Governance Review) before Item 5 (Overview and Scrutiny). For clarity the minutes are presented in the order the items appear on the agenda.

### **1. APOLOGIES FOR ABSENCE**

Apologies for absence were received on behalf of:

- Councillor Asma Begum (Deputy Mayor and Cabinet Member for Community Safety and Equalities)
- Councillor Danny Hassell (Cabinet Member for Children, Schools and Young People)
- Councillor James King (Chair of the Overview and Scrutiny Committee)

### **2. DECLARATIONS OF DISCLOSABLE PECUNIARY INTERESTS**

Councillors Amina Ali, David Edgar and Motin Uz-Zaman all declared Disclosable Pecuniary Interests in relation to Agenda Item 6.2 (Urgent Structural Works – Brewster House and Maltings House) and left the room for the duration of that item.

The Mayor and Councillor Sirajul Islam noted 'other interests' in the same agenda item as family members were leaseholders. They took part in discussion of that item.



### 3. UNRESTRICTED MINUTES

#### RESOLVED

1. That the unrestricted minutes of the Cabinet meeting held on Wednesday 22 May 2019, be approved and signed by the Chair as a correct record of proceedings.

### 4. ANNOUNCEMENTS (IF ANY) FROM THE MAYOR

The Mayor made a number of announcements at the meeting including that the final OFSTED inspection had taken place and, whilst general feedback was encouraging, the final report would be published next month.

He also highlighted a number of recent awards for housing services including for East End Homes and Swan Housing and a shortlisted nomination on energy efficiency.

He then introduced Jaami Barry the recently elected Young Mayor for the Borough. Jammi Barry addressed Cabinet. He talked about his proud background and family. He then took Cabinet through his vision for how he could support young people in the Borough helping them become healthier, happier and safer.

He then introduced his team of Deputy Mayors who all also addressed Cabinet on their own portfolio responsibilities.

- Vivian Akinremi on her goal of improving work to tackle mental health issues in young people.
- Muhsin Mahmud on the importance of improving the Council's communications with younger residents.
- Ahmed Duale on increasing environmental understanding among young people.
- Nadia Hussein working to develop links between different communities.

The Mayor thanked them all for their presentation and highlighted his desire to work closely with the Young Mayor and Deputy Young Mayors.

### 5. OVERVIEW & SCRUTINY COMMITTEE

#### 5.1 Chair's Advice of Key Issues or Questions

Pre-Decision Scrutiny Questions were tabled in respect of Agenda Items:

- 6.1 (Spitalfields and Banglatown Community Governance Review)
- 6.4 (Mudchute Farm, Park and allotments)
- 6.5 (Tower Hamlets CCTV Approach)
- 6.7 (Contracts Forward Plan 2019/20 – Quarter One)

The questions, and officer responses, were considered during discussion of the relevant agenda items.

In addition, Councillor Sufia Alam, Vice-Chair of the Overview and Scrutiny Committee provided an update on the recent work of the Committee. She reported that the Members had recently undertaken their work planning day where they had identified a number of key areas to scrutinise including waste contracts, crime and anti-social behaviour and liveable streets.

She then provided an update on their Committee meeting earlier in the week. She reported on a number of items for discussion including:

- An update on work to support the night-time economy.
- A spotlight session with the Mayor looking at his priorities for the year ahead.
- A good discussion on the Children's Services Improvement Plan with Councillor Danny Hassell with encouraging information provided in how the service was developing.

She also provided an update on the Children and Education Scrutiny Sub-Committee meeting which had taken place the previous evening. There had been a useful discussion about proposals to close Raines School and the need to ensure good communication between the Council and parents. There had also been a discussion on school improvement in general and how to support teachers' professional development.

The **Mayor** thanked her for her update.

## **5.2 Any Unrestricted Decisions "Called in" by the Overview & Scrutiny Committee**

Nil items.

## **6. UNRESTRICTED REPORTS FOR CONSIDERATION**

### **6.1 Spitalfields and Banglatown Community Governance Review Update**

The Cabinet considered the report of Will Tuckley, Chief Executive, regarding the Spitalfields and Banglatown Community Governance Review Update. The Chief Executive explained that the council had received a valid petition last summer requiring the Council to conduct a governance review to determine whether a parish council should be established.

As part of that process the Council had submitted its Draft Recommendation (to reject the proposal for a parish council and instead look to strengthen existing forms of governance) to a consultation exercise which completed in late May 2019. The report set out the results of that consultation for Member review.

The Mayor invited lead campaigners for a parish council to speak on the report findings. A summary of points raised included that:

- Campaigners were disappointed with the consultation exercise and rejected the findings. The authenticity of the paper responses was challenged.

- They believed that residents had been misled about the size and sources of funding required in setting up a parish council.
- They described 'Banglatown' as being a 'political football' that connected politics to race and fostered division.
- It was claimed valid analysis by the campaigners had been rejected by the council.
- Campaigners urged the Mayor to reject the report and defer the decision pending independent expert advice.
- Campaigners argued that the current administration was not functioning well and the creation of a parish council would have tackled issues around austerity.
- A parish council could have brought residents together and allowed them to take ownership of local services rather than having to rely on the Member Enquiries system.
- Campaigners urged the Council to hold a referendum to determine whether a parish council should be set up.
- They suggested that Parish councils were generally seen as a positive community asset.
- Petitioners queried why the establishment of a parish council faced such strong opposition in Tower Hamlets when they were seen in a positive light by the rest of the country, including the mainstream political parties whose manifesto's endorsed the devolution of powers.

During discussion Councillor Andrew Wood, Leader of the Conservative Group, questioned whether parish councils created a community cohesion impact. The Mayor then confirmed he was open to the principle of a parish council and that no group 'Whip' was in place in respect of how councillors would vote at Council. He noted the pre-decision scrutiny questions and officer responses.

The Mayor thanked speakers for their comments and reminded Cabinet and members of the public that the creation of a parish council was a Council decision. The Chief Executive said he would take into consideration the comments heard at Cabinet and findings from the consultation in his report to Council on 17 July 2019.

## **RESOLVED**

1. To note the report.

### **6.2 Urgent Structural Works-Brewster House and Malting House**

Councillor Sirajul Islam, Statutory Deputy Mayor and Cabinet Member for Housing, introduced the report. He explained that this report set out plans for significant structural improvement works which were needed on these housing blocks. It was complex work which would take eighteen months to complete. The report set out the details of how the works would be undertaken. He acknowledged that this was likely to be extremely disruptive to residents and mitigation measures were also set out.

The report set out the likely costs to leaseholders. He accepted these were large sums which would prove challenging to some leaseholders. The Council was proposing to operate a buy-back scheme for those who wished to make use of it. A number of other options were also set out.

During discussion Members heard from a number of residents who had concerns over the works and the large charges they were now facing. This was placing them in a stressful situation and many were elderly so were finding it difficult to cope.

Members also noted that consultation had taken place with residents and that the Council considered that the works had to take place but was doing what it could to put a limit on the impact.

Following the discussion the **Mayor** noted the exempt appendix and then agreed to defer a decision on undertaking the works to allow time for further meetings with residents to explore options. However, he agreed that the buy-back scheme should be introduced to help residents who wish to make use of it.

## **RESOLVED**

1. To note that officers will explore the voluntary buy-back of leasehold properties in the two blocks, under the existing budgeted borough-wide buy-back programme, with potential costs estimated at c.£9.6m.
2. To agree to the introduction of two additional borough-wide leasehold service charge payment options as set out in sections 9.5 - 9.7 of the report.
3. To defer agreement of the following three recommendations subject to further discussion – with final decisions to be taken by Individual Mayoral Decision if required:
  - a. To agree that capital resources of £8,083,081 are made available within the five year HRA Capital Programme to fund the works (Option 1) and the services associated with delivering the works, and agree to adjust the five year programme accordingly.
  - b. Agree to the award of the works contract to Wates in the sum of £6,276,605.50. Wates has been procured via the Council's Better Neighbourhoods Works Framework.
  - c. Agree to formally consult leaseholders and to recharge them for their portion of the cost of the works.

### 6.3 Children's Services Improvement Programme, Quarterly Progress Report (Quarter 4- 2018/19)

The **Mayor** introduced the report and provided a summary of the process to date. He noted that the final OFSTED report was due in July but that this update did provide good evidence of the progress that had been made.

He welcomed the report and **agreed** the recommendations.

#### RESOLVED

1. To endorse the progress made in delivering the Children's Services improvement programme.
2. To agree the next steps in the improvement journey which will be updated on in the next report.

### 6.4 Mudchute Farm, Park and allotments, Pier Road E14, Grant of long lease

The **Mayor** introduced the report proposing a long lease for Mudchute Farm, park and allotments. He noted that the aim of the proposals was to create certainty for all parties involved although he noted there were strong views on the issue.

He heard presentations from allotment members expressing concern both about the terms and nature of the allotment's sub-lease and also in relation to internal allotment society disagreements which they argued meant the society was not in a position to sign the lease.

During discussion it was noted that the Council had no role in the internal arrangements of the society.

The **Mayor** noted the Pre-Decision Scrutiny Questions and officers responses and, whilst noting the strong feelings expressed, **agreed** the recommendations as set out.

#### RESOLVED

1. To agree to accept a surrender of the lease dated 8 October 2004 held by the Mudchute Association, which covers Mudchute Farm and Park.
2. To agree that simultaneously with the surrender, the Council will grant a new lease to the Mudchute Association for a term of 99 years at a peppercorn rent, covering the same area and on the main terms set out in paragraph 3.9 of the report.
3. To note that simultaneously with the above, the Mudchute Association will grant the Isle of Dogs and District Allotments Society a sub-lease, also for a term of 99 years (less one day) at a

peppercorn rent and on the main terms set out in paragraph 3.11 of the report.

4. To agree to delegate authority to the Corporate Director of Place to agree the remaining terms of the lease and minor variations to the terms set out in this report.
5. To note that the Council gave notice of its intention to dispose of the open space, by way of the grant of a long lease, and that no objections were received by the closing date of 13 December 2018.
6. To note the equalities considerations as set out in section 4 of the report.

## 6.5 Tower Hamlets CCTV Approach

The **Mayor** introduced the report setting out the Council's approach to the use of CCTV cameras.

During discussion a number of points were noted including:

- Suggestions the use of cameras should be looked at in terms of the night time economy.
- Residents were able to suggest locations for cameras which would be evaluated against the criteria for use.
- That cameras were more useful in detection and investigation of crime than in deterrence.
- Cameras did not have to be fixed in one location but could be temporary.
- Resident engagement was important to this process.
- The Council could also work with local businesses, but it was important their cameras were of good quality.

The **Mayor** noted the Pre-Decision Scrutiny Questions and officers responses and **agreed** the recommendations as set out.

### RESOLVED

1. To note the contents of the report including the findings from the literature review, stakeholder engagement and local data analysis.
2. To agree to the eighteen recommendations contained at the conclusion of the report in paragraph 3.6.

## 6.6 Capital Programme Approvals

Councillor Candida Ronald, Cabinet Member for Resources and the Voluntary Sector, introduced the report. She noted that a number of specific schemes were set out in the report seeking approval for capital expenditure. She also noted the proposal to allow capital reports to be presented to Cabinet when required rather than just within the quarterly budget monitoring reports.

The **Mayor** considered the report and **agreed** the recommendations as set out.

### **RESOLVED**

1. To adopt the listed pipeline schemes as set out in Appendix A to the report into the Council's approved capital programme
2. To agree that approval to proceed to award contracts for works and services be delegated to the Corporate Director, Place in consultation with the Corporate Director, Governance, subject to tenders being within the capital estimate amount and scheme PIDs being approved at Capital Strategy Board.
3. To note and approve the increased scheme costs for the Interim Depot Provision (item 4.6 in the report)
4. To adopt proposals for capital reports to be presented to Cabinet in-between finance quarterly monitoring as required, following approvals gained at the Capital Strategy Board.

### **6.7 Contracts Forward Plan 2019/20 - Quarter One**

Councillor Candida Ronald, Cabinet Member for Resources and the Voluntary Sector, introduced the report on the contracts forward plan. She highlighted that this was an opportunity for Members to request full reports on contracts before they proceeded to award.

During discussion questions were asked in relation to the financing and pupil projections of the proposed London Dock Secondary School. The **Mayor** agreed that a report would be required to Cabinet on that particular contract.

The Mayor noted the Pre-Decision Scrutiny Questions and officer responses and **agreed** the amended recommendations.

### **RESOLVED**

1. That a report on P5562 (Construction of London Dock Secondary School) be presented to Cabinet in advance of contract award.
2. That all other contracts set out in Appendix 1 to the report may proceed to contract award after tender.
3. To authorise the Divisional Director, Legal Services, to execute all necessary contract documents in respect of the awards of contracts referred to at Recommendation 2 above.
4. To note the procurement forward plan 2019-22 schedule detailed in Appendix 2 to the report and identify any contracts about which further

detail is required in advance of the quarterly forward plan reporting cycle.

## **6.8 Nomination to Outside Bodies**

The **Mayor** introduced the report setting out proposed appointments to outside bodies. He **agreed** the recommendation as set out.

### **RESOLVED**

1. To agree the nominations to outside bodies as shown in Paragraph 3.3 of the report.

## **7. ANY OTHER UNRESTRICTED BUSINESS CONSIDERED TO BE URGENT**

Nil items.

## **8. EXCLUSION OF THE PRESS AND PUBLIC**

Nil items.

## **9. EXEMPT / CONFIDENTIAL MINUTES**

Nil items.

## **10. OVERVIEW & SCRUTINY COMMITTEE**

### **10.1 Chair's Advice of Key Issues or Questions in Relation to Exempt / Confidential Business**

Nil items.

### **10.2 Any Exempt / Confidential Decisions "Called in" by the Overview & Scrutiny Committee**

Nil items.

## **11. ANY OTHER EXEMPT/ CONFIDENTIAL BUSINESS CONSIDERED TO BE URGENT**

Nil items.

The meeting ended at 7.53 p.m.

MAYOR JOHN BIGGS



<p><b>Cabinet</b></p> <p>31/07/2019</p>	 <p><b>TOWER HAMLETS</b></p>
<p><b>Report of:</b> Debbie Jones, Corporate Director Children &amp; Culture</p>	<p><b>Classification:</b> Unrestricted</p>
<p><b>Outcome of recent Ofsted Inspection of Local Authority Children’s Services (ILACS)</b></p>	

<b>Lead Member</b>	<b>Councillor Danny Hassell Cabinet Member for Children, Schools and Young People</b>
<b>Originating Officer(s)</b>	Jonathan Solomons, Strategy and Policy Manager, Children & Culture
<b>Wards affected</b>	All wards
<b>Key Decision?</b>	Yes/No
<b>Forward Plan Notice Published</b>	[Insert date notice was published]
<b>Reason for Key Decision</b>	[Financial Threshold / Impact on Wards]
<b>Strategic Plan Priority / Outcome</b>	<b>A borough that our residents are proud of and love to live in</b>

**Executive Summary**

Children’s Services were inspected between the 3<sup>rd</sup> and the 21<sup>st</sup> June 2019. This inspection followed an inspection in early 2017 where Children’s Services were rated as inadequate. This most recent inspection considered the improvements that have been made to services over the past two years.

The result of the inspection was the Children’s Services in Tower Hamlets are now rated as GOOD. The grade above inadequate is Requires Improvement so this rating represents a significant improvement. This report will outline some of the key highlights from the inspection report.

**Recommendations:**

The Mayor in Cabinet is recommended to:

1. Note the contents of this report and the outcome of the recent inspection

**1 REASONS FOR THE DECISIONS**

- 1.1 Cabinet have been monitoring the progress of the Children’s Services Improvement journey since the inspection in 2017. This report represents the culmination of that work.

## 2 ALTERNATIVE OPTIONS

2.1 There are no alternative options

## 3 DETAILS OF THE REPORT

3.1 The final inspection report was published on the 22<sup>nd</sup> July following an inspection that took place between the 3<sup>rd</sup> and the 19<sup>th</sup> of June. During the inspection four inspectors looked closely at the practice within our statutory and early help services.

3.2 The outcome of the inspection was as follows.

<b>Judgement</b>	<b>Grade</b>
The impact of leaders on social work practice with children and families	Good
The experiences and progress of children who need help and protection	Good
The experiences and progress of children in care and care leavers	Good
Overall effectiveness	Good

3.3 This outcome represents an improvement of two grades in the space of just over two years.

3.4 Some of the key highlights from the report are as follows.

“Services for children in Tower Hamlets are now good and have substantially improved since they were found to be inadequate in 2017. Since then, leaders and managers have had a relentless focus to improve practice to deliver good experiences and progress for children and their families. At all levels, there is effective management oversight and a direct understanding of the quality of significantly improved frontline practice”

“Effective and well-coordinated universal and early help provision means that children and families receive good help when they need it. Children in need, including those in need of protection, benefit from good assessments that inform plans to reduce risk and improve children’s circumstances. The workforce reflects the diversity of the local population and staff sensitively take account of, and respond appropriately to, the cultural and religious needs of children and families in Tower Hamlets”

“Children in care and care leavers receive good support from workers who know them well and are appropriately ambitious for them. They live in stable homes, which helps them to do their best in all aspects of their lives.

3.5 In relation to the experiences and progress of children who need help and protection:

“Children and their families benefit from an extensive range of increasingly well-coordinated multi-agency early help support. Since the previous inspection in 2017, the local authority and partners agencies have taken carefully considered action to reconfigure and target services to ensure that they are effective.”

“Referrals into the multi-agency safeguarding hub (MASH) are appropriate and reflect partners’ good understanding of thresholds.... All work is allocated for an assessment of children’s needs, quickly and effectively.”

“Children receive effective support and interventions from the out-of-hours emergency duty team..... Good communication between out-of-hours and daytime services means that children receive a timely and highly effective service that improves their immediate situation.”

“Most assessments are comprehensive and analytical. They demonstrate effective and thoughtful engagement with families and a good understanding of children’s needs.”

“The quality of social work practice in the family support and protection teams has significantly improved. **Inspectors did not find any children at risk of immediate harm.** This is vastly different from the 2017 inspection..... In most cases, good work is helping to improve circumstances for children.

“The impact of the strategic neglect work has led to better recognition and understanding of the impact of accumulative neglect. The increasing use of the neglect tool is improving the understanding of this on the child’s lived experience.”

“Management oversight is clearly evidenced on children’s files; it is regular and covers key decision points appropriately in children’s lives. This includes appropriate senior management oversight to ensure that plans are progressed in a timely manner.... Improved oversight of plans from child protection chairs through midway reviews prevents risks of drift in progressing plans. Clear contingency planning, including use of Public Law Outline (PLO), has seen the numbers of care applications rise for younger children. This reflects senior managers’ decision to refocus resources on early intervention and tackle childhood neglect, in this, the most deprived local authority in England (Deprivation Index).”

“Disabled children’s assessments and plans are of a good standard. They inform actions that keep children safe and improve their circumstances. All

assessments give clear focus to the needs of individual children, their health and development.”

“Highly vulnerable children at risk of exploitation, including those missing from home, school or care, receive effective, bespoke services, delivered sensitively by skilled and committed staff. Strong partnerships serve to protect these children from harm..... Emerging risks to young people are identified early, through an innovative multi-agency co-located exploitation team and gangs unit..... Excellent work by the exploitation team ensures that social workers and early help practitioners are knowledgeable and confident in recognising the signs of exploitation and the impact of neglect, domestic abuse and absent fathers, which increase vulnerability to exploitation. Vulnerable adolescents in care receive well-coordinated services, including those adolescents who are placed out of area.”

### 3.6 In relation to the experiences and progress of children in care and care leavers:

“Children come into care appropriately when risks increase for them, and they are no longer able to safely live at home. Workers in the ‘edge of care’ team build close and trusting relationships with children, and effective support enables many to remain safely living at home or with other family members.”

“All permanence options, including special guardianship orders and adoption, are now considered simultaneously, including assessments of family members and whether brothers and sisters can live together. Exceptional effort is made to ensure that children can live with their families and friends.”

“Children’s views are clear in assessments, which are regularly updated. Care plans are child-centred, and most are comprehensive, analytical and include contingency plans. Children’s wishes influence care planning. Social workers visit children regularly, strive to have meaningful relationships with them and speak about them with real affection. Manageable caseloads allow time for sensitive and creative direct work to help children understand their experiences and improve their life chances.”

“The work of the independent reviewing officers (IROs) has improved significantly..... Evidence of effective challenge is ensuring progress of care plans and reduces delay, including alerts to keep planning on track. IROs are creative in their approach to get to know children, and reviews are child-centred.”

“Children’s physical and emotional health needs are quickly assessed, met, and regularly reviewed. Clinicians and psychologists work collaboratively with social workers, foster carers and other professionals to support them to develop skills that help traumatised children.”

“Personal education plans (PEPs) provide a sound basis to plan and review the progress children make. Children in care receive effective support from

the virtual school staff, who understand their individual needs and act as effective advocates for them.”

“Foster carers feel highly valued, they receive good support and extensive training focused on meeting the needs of children. Good training opportunities are available in support groups, hubs, and one-to-one during supervisory visits.... An excellent Foster Carers Association contributes to national guidance, for example guidance for caring for Muslim children, and is integral to the positive development of the service.

“The adoption service has made considerable improvements since the previous inspection, including doubling the numbers of approved adopters and adoption orders from the previous 12 months.”

“For children leaving care, the ‘through-care’ service provides strong supportive relationships between most staff and young people, including proactive work with young people in custody. Young people value the easy access and the services provided at the weekly drop-in at ‘Kitcat Terrace’, with one young person stating, ‘I grew up here, this is my family’.

### 3.7 In relation to the impact of leaders on social work practice with children and families:

“Senior leaders and elected members have focused relentlessly on improving practice across all services, changing the culture and tackling previous poor performance. This has made a significant and discernible difference to the help, protection and care experienced by the most vulnerable children in the borough..... They demonstrate a shared responsibility and have a comprehensive understanding of their strengths and further areas for development. They are realistic about and cognisant of the challenges that they face in order to embed and sustain the remarkable progress they have achieved since the inspection of 2017.”

“The corporate director for children and culture has effectively influenced and collaborated with a range of partners and corporate leaders to transform the non-compliance culture in children’s services to one of collective accountability for protecting vulnerable children. The focus of senior leaders has been to create sustainable change and to develop appropriate future leaders across the organisation. There has been incremental change that has enabled managers ‘to take people with them’, and to really understand what had previously gone wrong.”

“Leaders, managers and staff have high ambitions for children in care and strive to meet these. Their work with care leavers, is commendably underpinned by the question ‘would it be good enough for my child?’ All the essential components are in place as good corporate parents.

“The local authority has transformed their performance management framework from unreliable and non-compliant to a highly effective and established quality assurance system. Their accurate assessment of the

quality and impact of practice is supported by a well-established and comprehensive performance framework informed by routine and regular case audits, practice observations and feedback from children and families.”

“Local need is both highly challenging and well understood, for example the high levels of poverty, deprivation and subsequent high levels of demand for services. The council responds to this respectfully and with inclusivity. The Parent and Family Support Service builds resilience, independence and sustainability in local communities to support early help and is highly valued by the parents involved. They feel empowered as parents and take great pride in the work they are doing to support other parents to engage with critical universal and targeted services at an early stage.”

“A strong emphasis on developing the social work academy and nurturing newly qualified social workers (NQSWs) encourages more to remain in the local authority..... Staff morale is high. Staff influence developments and are included in decisions, for example the introduction of restorative model of practice. Staff want to work in Tower Hamlets, and many agency staff are converting to permanent contracts. The local authority has invested in staff to ensure that caseloads are manageable; this enables children to build trusting relationships with social workers and creates the right environment for good practice.”

### 3.8 Areas for development

The report also includes three recommendations for improvement.

- The quality of plans for children in need across the family support and protection teams in order to ensure that they are consistently good or better.
- The response and oversight of work in relation to allegations against professionals.
- The quality and coordination of plans to support children returning home from care to remain with their families.

## **4 COMMENTS OF THE CHIEF FINANCE OFFICER**

- 4.1 As part of the 2017-2020 MTFS, additional growth of £5.2m was awarded to Childrens Services addressing pressure in a range of areas, most of which featured in the improvement plan
- 4.2 In addition to the above growth, one-off investment funding via the Council's Transformation Reserve was used in 2017/18 and 2018/19 to support the implementation of the improvement plan. The estimated cost of this plan for Children's Social Care over 2 years was £4.2m. Only £3.7m was spent within CSC during the first 2 years. The balance of £0.5m has been reserved to cover additional costs leading up to the final 2019/20 inspection.

- 4.3 £0.5m was also approved to fund expenditure on CS Improvement within the Governance Division. Therefore a total of £4.7m was approved to fund CS Improvements from the Transformation Reserve.
- 4.4 The level of one-off funding was based on a detailed assessment of the costs associated with the improvement plan and the improvements that will be achieved, as a result of the investment, have also been identified and are regularly monitored. Finance is currently working with the service to identify the impact on the budget moving forward post Ofsted improvement.

## **5 COMMENTS OF LEGAL SERVICES**

- 5.1. The framework for Ofsted inspections of Children's Services is set out in sections 135-142 of the Education and Inspection Act 2006 ('the Act') and associated Employment and Education Act 2006 (Inspection of Local Authorities) Regulations 2007 ('the Regulations').
- 5.2. In light of Tower Hamlets' improved performance during monitoring visits, Ofsted re-inspected under the ILACS framework, "Framework, evaluation criteria and inspector guidance for the inspections of local authority children's services", introduced in November 2017. The result of the inspection was the Children's Services in Tower Hamlets are now rated as GOOD. Consequently the Council will now follow the pathway for local authorities which are graded good or outstanding, and unless concerns are identified in the interim, the next inspection will be a short inspection.

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### **Linked Reports, Appendices and Background Documents**

#### **Linked Report**

- None.

#### **Appendices**

- ILACS Report

#### **Officer contact details for documents:**

N/A

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# London Borough of Tower Hamlets

## Inspection of children’s social care services

**Inspection dates: 10 June 2019 to 21 June 2019**

**Lead inspector: Marcie Taylor  
Her Majesty’s Inspector**

<b>Judgement</b>	<b>Grade</b>
The impact of leaders on social work practice with children and families	Good
The experiences and progress of children who need help and protection	Good
The experiences and progress of children in care and care leavers	Good
Overall effectiveness	Good

Services for children in Tower Hamlets are now good and have substantially improved since they were found to be inadequate in 2017. Since then, leaders and managers have had a relentless focus to improve practice to deliver good experiences and progress for children and their families. At all levels, there is effective management oversight and a direct understanding of the quality of significantly improved frontline practice.

Effective and well-coordinated universal and early help provision means that children and families receive good help when they need it. Children in need, including those in need of protection, benefit from good assessments that inform plans to reduce risk and improve children’s circumstances. The workforce reflects the diversity of the local population and staff sensitively take account of, and respond appropriately to, the cultural and religious needs of children and families in Tower Hamlets.

Children in care and care leavers receive good support from workers who know them well and are appropriately ambitious for them. They live in stable homes, which helps them to do their best in all aspects of their lives.

## **What needs to improve**

- The quality of plans for children in need across the family support and protection teams in order to ensure that they are consistently good or better.
- The response and oversight of work in relation to allegations made against professionals.
- The quality and coordination of plans to support children returning home from care to remain with their families.

## **The experiences and progress of children who need help and protection: Good**

1. Children and their families benefit from an extensive range of increasingly well-coordinated multi-agency early help support. Since the previous inspection in 2017, the local authority and partner agencies have taken carefully considered action to reconfigure and target services to ensure that they are effective. This ensures that early help services are offered based on assessed need, and are responsive. Children benefit from bespoke and skilled work undertaken by knowledgeable early help practitioners. They diligently deliver intensive direct work to children experiencing neglect, and those living with parental substance misuse, poor mental health and domestic abuse.
2. The local authority and partners are committed to developing and supporting effective early help through universal service provision. Schools have termly meetings on attendance and behaviour and an ongoing programme of safeguarding audits. Prompt action follows when concerns are raised by schools about safeguarding practice in schools. For example, the curriculum has been developed to help to prevent extremism and radicalisation. There is also training to develop staff's understanding of attachment, and the healthy schools programme is employed effectively.
3. Several schools directly employ social workers, who provide advice and guidance to pastoral and other staff and undertake direct work with children and their families. Both elective home education (EHE) and children missing education (CME) staff use early help assessments well when children and their families need additional support. The 'team around the child' approach helps secure additional support for children, for example mentoring. EHE staff have high regard for children's welfare and go the extra mile.

4. Referrals into the multi-agency safeguarding hub (MASH) are appropriate and reflect partners' good understanding of thresholds. Initial referred concerns are screened by experienced managers, and work is allocated according to risk, using coloured 'banners' that highlight clear actions to individual workers. This enables confident, timely and safe progression of the high volume of daily contacts. A daily MASH meeting ensures effective multi-agency collaboration that leads to appropriate and timely decision-making for children. Disabled children's workers offer a duty service in the MASH, meaning that timely decisions are taken about how best to help and protect children with complex needs. Consent is routinely sought and when concerns escalate, it is overridden appropriately. All work is allocated quickly and effectively for an assessment of children's needs.
5. Children receive effective support and interventions from the out-of-hours emergency duty team. Clear practice standards are in place, underpinned by a range of tools to support risk assessment and decision-making. Records are comprehensive and demonstrate proportionate involvement, good decision-making and actions appropriate to need and risk. Good communication between out-of-hours and daytime services means that children receive a timely and highly effective service that improves their immediate situation.
6. Most assessments are comprehensive and analytical. They demonstrate effective and thoughtful engagement with families and a good understanding of children's needs. Careful account is taken of family history, and consistently strong efforts are made to understand the impact of parental cultures, religious and belief systems, and the impact of mental illness, poverty and domestic abuse. The quality of social work practice in the family support and protection teams has significantly improved. Inspectors did not find any children at risk of immediate harm. This is vastly different from the 2017 inspection, when high numbers of children were left unprotected. In most cases, good work is helping to improve circumstances for children. Across a small number of teams, there is too much variability in practice that the local authority is working to address.
7. The local authority's approach to EHE children is underpinned by a strong safeguarding culture. Children are seen annually in order to establish their progress, and parents are supported through network meetings to help them provide a good-quality education for their children, including advice on the curriculum. Celebration events are held for EHE children. Effective arrangements are in place to identify children who are not registered at school and not receiving a suitable education. Staff act promptly to identify missing children and gain a good understanding of their circumstances. Rigorous checks are undertaken to establish the whereabouts of children. Most children missing education are quickly identified and found a school place.

8. Most child protection and child in need plans are realistic and identify clear desired outcomes so parents and children understand and address concerns. When risks escalate, effective and appropriate action is taken to mitigate this and keep children safe. Records are thorough and up to date and are produced in a timely manner for core groups, child protection visits and conferences. The child's voice is clearly represented in minutes and plans. There is appropriate use of advocates and family group conferences to engage families and provide a wide range of services to support and help parents.
9. The impact of the strategic neglect work has led to better recognition and understanding of the impact of accumulative neglect. The increasing use of the neglect tool is improving the understanding of this on the child's lived experience. There is clear evidence that workers are specifically and appropriately 'naming neglect', and there has been a significant move away from categorising such risk under emotional abuse.
10. Children are seen regularly and alone according to their assessed need, and there is evidence of persistent child-centred work. Knowledgeable workers use relationship-based work through a wide range of tools, including the neglect tool, and direct work through games, writing and outings. The use of video interactive guidance helps parents understand the impact of substance misuse. This leads to reduced risk and helps to effectively capture children's wishes and feelings to inform plans.
11. Management oversight is clearly evidenced on children's files; it is regular and covers key decision points appropriately in children's lives. This includes appropriate senior management oversight to ensure that plans are progressed in a timely manner.
12. Improved oversight of plans from child protection chairs through midway reviews prevents risks of drift in progressing plans. Clear contingency planning, including use of Public Law Outline (PLO), has seen the numbers of care applications rise for younger children. This reflects senior managers' decision to refocus resources on early intervention and tackle childhood neglect, in this, the most deprived local authority in England (English Indices of Deprivation). Performance data and systems to track and review children subject to PLO are well established. This is preventing drift and leads to timely decisions about applications to family courts. Decisions are underpinned by effective and accessible legal advice at the weekly legal gateway meeting.
13. Disabled children's assessments and plans are of a good standard. They inform actions that keep children safe and improve their circumstances. All assessments give clear focus to the needs of individual children, their health and development. They appropriately consider culture and heritage, critically analyse parenting capacity (including fathers) and recognise and summarise

risk. Children experience continuity of social worker from the point of referral, which enables them to build meaningful relationships with workers who know them well. Children benefit from early planning to secure ongoing support into adulthood.

14. Highly vulnerable children at risk of exploitation, including those missing from home, school or care, receive effective, bespoke services, delivered sensitively by skilled and committed staff. Strong partnerships serve to protect these children from harm. This is a significant improvement since the inspection in 2017, when too many exploited children were left unprotected. Emerging risks to young people are identified early, through an innovative multi-agency co-located exploitation team and gangs unit. Information is continually and quickly evaluated, leading to effective disruptive action to perpetrators. In collaboration with the community safety rapid response team, emerging incidents are quickly diffused. These children benefit from plans that are overseen by effective complex multi-agency strategy meetings and regular reviews. Targeted creative approaches are employed to build relationships with children, and risk is reduced. Excellent work by the exploitation team ensures that social workers and early help practitioners are knowledgeable and confident in recognising the signs of exploitation and the impact of neglect, domestic abuse and absent fathers, which increases vulnerability to exploitation. Vulnerable adolescents in care receive well-coordinated services, including those adolescents who are placed out of area.
15. Arrangements for the completion of return home interviews (RHIs) have been streamlined and are effective. The quality of RHIs has improved. A specifically trained group of professionals from the MASH, out-of-hours and early help services regularly visit children to conduct interviews. There is a strong emphasis on working alongside and with young people at the earliest opportunity. The development of a weekend RHI service carried out by the same practitioners is helping children to develop purposeful relationships with professionals and avoids them having to repeat their stories.
16. Risks to children of female genital mutilation and radicalisation are identified and referred to the MASH by relevant professionals, who demonstrate an inquisitive and sensitive awareness of the cultural vulnerabilities to children in their communities. High-level risks of the radicalisation of young people are understood and recognised very well. Assessments are thorough and result in appropriate support, including protection orders and ongoing interventions, usually within a child in need plan.
17. Children at risk of becoming homeless are quickly identified through the MASH or the housing service. Joint assessments are undertaken where this is appropriate. In most cases, the dedicated specialist homeless social worker leads or supports comprehensive assessments of need that often mean homelessness is prevented or that children appropriately come into care, where they are well supported.

18. A new system to ensure consistent and rigorous response to allegations against professionals is not yet fully established and does not effectively track and monitor the progress of casework. The action plan to progress this work lacks clear priorities to highlight proactive engagement with agencies in raising awareness of their responsibilities to report and act on concerns, for example with the diverse range of local community and faith groups.

## **The experiences and progress of children in care and care leavers: Good**

19. Children come into care appropriately when risks increase for them and they are no longer able to safely live at home. Workers in the 'edge of care' team build close and trusting relationships with children, and effective support enables many to remain safely living at home or with other family members.
20. For children returning home from care, the quality of practice is not consistent. Some children benefit from thorough planning and collaborative multi-agency work. For other children whose plan is to return home, plans are not supported by an up-to-date assessment. Some children experience delay in the revocation of care orders, despite them asking for this to happen. The local authority knows it needs to improve integrated work between teams so that children are more effectively supported when they return home.
21. Family finding for children who cannot live safely with birth parents is timely through the legal gateway process. All permanence options, including special guardianship orders and adoption, are now considered simultaneously, including assessments of family members and whether brothers and sisters can live together. Exceptional effort is made to ensure that children can live with their families and friends. Regular permanence planning meetings ensure that progress is made against the child's specific care plan. The head of service has modelled excellent child-centred practice effectively, 'skilling up' team managers to make confident decisions.
22. Children's views are clear in assessments, which are regularly updated. Care plans are child-centred, and most are comprehensive and analytical, and include contingency plans. Children's wishes influence care planning. Social workers visit children regularly, strive to have meaningful relationships with them and speak about them with real affection. Manageable caseloads allow time for sensitive and creative direct work to help children understand their experiences and improve their life chances.
23. The work of the independent reviewing officers (IROs) has improved significantly. Midway monitoring and visits to see children with their carers brings additional rigour and oversight. Evidence of effective challenge is ensuring progress of care plans and reduces delay, including alerts to keep

planning on track. IROs are creative in their approach to get to know children, and reviews are child-centred.

24. Children's physical and emotional health needs are quickly assessed and met and are regularly reviewed. Clinicians and psychologists work collaboratively with social workers, foster carers and other professionals to support them to develop skills that help traumatised children. They do this by, for example, advising hospital-based staff on how to care for children who self-harm, and the edge of care team on how to work with children to support emotional well-being and issues of previous trauma and abuse.
25. Personal education plans (PEPs) provide a sound basis to plan and review the progress children make. Children in care receive effective support from the virtual school staff, who understand their individual needs and act as effective advocates for them. This helps children stay on track to achieve their goals, and, consequently, many make good progress from their starting points.
26. A strong enrichment programme supports children's academic, personal and social development. A summer residential for children in care helps the transition of pupils into secondary school and study support groups help preparation for tests and exams.
27. Most children attend school regularly. Although improving, the proportion of those persistently absent at Key Stage 4 is too high. Once they complete year 11, a good proportion move into further education and training. However, attendance is not good for some young people, and this inhibits their progress. Plans are in place to address this.
28. The quality and stability of placements for children in care is good. Children are specifically matched with long-term carers, and this is systematically reviewed when they have been in care for six months. The 'Mockingbird' project is well established. Children and foster carers are matched together, allowing children to go to other carers for a break with a foster family they know well. Foster carer hubs, led by experienced carers, provide mentoring and support to improve long-term stability of children with more complex needs.
29. The recruitment of foster carers benefits from a dedicated family finding coordinator and a community resource officer for outreach work in the borough's diverse communities. The recruitment of suitable carers is challenging; however, assiduous action, including the recruitment of carers, and developing existing carers to meet the specific needs of their care population, is addressing this.
30. Foster carers feel highly valued, they receive good support and extensive training focused on meeting the needs of children. Good training opportunities are available in support groups, hubs, and one-to-one during

supervisory visits. A wide range of effective support for foster carers includes mentoring, fostering champions, fostering ambassadors, and fostering potential (educational support for primary school children). Support groups include 'staying put' carers, and sons and daughters of carers. An excellent Foster Carers Association contributes to national guidance, for example guidance for caring for Muslim children, and is integral to the positive development of the service.

31. The adoption service has made considerable improvements since the previous inspection, including doubling the numbers of approved adopters and adoption orders from the previous 12 months. An embedded culture of early permanence planning is promoted by the improvement manager, who has established a clear working structure and a secure system of family finding, tracking and parallel planning.
32. There is a clear and comprehensive recruitment strategy for adopters, particularly for same-sex couples. Feedback from adopters describes workers as extremely supportive, putting their 'heart and soul' into the work. All spoken to would recommend Tower Hamlets as an adoption agency. Assessments of adopters' suitability are improving in quality, analysis and timeliness. Matching reports sensitively identify the needs of children and good use of a virtual reality headset in the assessment process helps to bring alive the realities of adoption. This enables prospective adopters to understand the experience of the child. The experienced agency decision-maker is appropriately challenging and provides good, clear, detailed and timely decisions, which are well recorded.
33. Adopters benefit from a wide range of high-quality training and support. This includes regular visits to guide them through the adoption and post-approval process. Adopters spoke positively about the dedicated therapeutic life-story workers who help children build a clear and realistic account of their early life history. Thoughtful, comprehensive adoption support plans actively consider a wide range of actual and future needs of children. The adoption support fund is routinely considered and utilised for ongoing therapeutic intervention and consultation with psychologists.
34. For children leaving care, the 'through-care' service provides strong supportive relationships between most staff and young people, including proactive work with young people in custody. Young people value the easy access and the services provided at the weekly drop-in at 'Kitcat Terrace', with one young person stating, 'I grew up here; this is my family.'
35. Pathway plans are reviewed regularly, and most are comprehensive and reflect young people's needs, wishes and feelings well. Young people's rights and entitlements are clearly recorded. There is a focus on making sure that young people have the key documents they need. For unaccompanied asylum-seeking children (UASC), pathway plans clearly identify actions in



relation to securing immigration status, and this is well embedded. Legal provision is accessible and trauma with UASC is well recognised. The 'Mockingbird' project helps UASC develop supportive relationships with other young people from the same country of origin.

36. Increasingly, young people are helped to access education, employment and training, and an increasing number of young people access apprenticeships in the council. Plans to introduce education champions to work alongside virtual school staff are underway to focus additional support on young people who are at risk of absenting from purposeful activity.
37. The range of accommodation for care leavers is reported by care leavers to be of a good quality. A multi-disciplinary housing panel effectively considers young people's specific vulnerabilities and tailors support to help them remain in their homes. An increasing number of care leavers remain living with their foster carers well into adulthood. Successful stays in semi-independent accommodation earn young people a 'nomination' for their own tenancy. Staff manage this well, using this to helpfully motivate young people towards independence.

### **The impact of leaders on social work practice with children and families: Good**

38. Senior leaders and elected members have focused relentlessly on improving practice across all services, changing the culture and tackling previous poor performance. This has made a significant and discernible difference to the help, protection and care experienced by the most vulnerable children in the borough. Leaders and managers have been effective in addressing all areas of poor performance identified in the previous inspection, with all recommendations being appropriately acted on. They demonstrate a shared responsibility and have a comprehensive understanding of their strengths and further areas for development. They are realistic about and cognisant of the challenges that they face in order to embed and sustain the remarkable progress they have achieved since the inspection of 2017.
39. The corporate director for children and culture has effectively influenced and collaborated with a range of partners and corporate leaders to transform the non-compliance culture in children's services to one of collective accountability for protecting vulnerable children. The focus of senior leaders has been to create sustainable change and to develop appropriate future leaders across the organisation. There has been incremental change that has enabled managers 'to take people with them', and to really understand what had previously gone wrong.
40. Work across partner agencies has been led through the local safeguarding children's board and there is now a culture of collaboration, shared priorities, and investment in joint resources. Examples include the development of the

exploitation team, the focus on neglect and the significant improvements to the health needs of children in care. Collaboration to improve the lives of children who experience neglect is a priority for the partnership, and effective multi-agency work is having a positive impact on coordinating and delivering early help services to reduce risk.

41. Leaders, managers and staff have high ambitions for children in care and strive to meet these. Their work with care leavers is commendably underpinned by the question 'would it be good enough for my child?' All the essential components are in place for them to be good corporate parents. Recent actions include care leavers' exemption from council tax, the housing offer for care leavers, and the retention of 'Kitcat Terrace' as an accessible facility for care leavers, in direct response to young people's feedback. As corporate parents, they have taken further action to improve participation for younger children in the children in care council.
42. The local authority has transformed its performance management framework from unreliable and non-compliant to a highly effective and established quality assurance system. Its accurate assessment of the quality and impact of practice is supported by a well-established and comprehensive performance framework informed by routine and regular case audits, practice observations and feedback from children and families.
43. Local need is both highly challenging and well understood, for example the high levels of poverty, deprivation and subsequent high levels of demand for services. The council responds to this respectfully and with inclusivity. The Parent and Family Support Service builds resilience, independence and sustainability in local communities to support early help and is highly valued by the parents involved. They feel empowered as parents and take great pride in the work they are doing to support other parents to engage with critical universal and targeted services at an early stage.
44. Senior leaders demonstrate that they are receptive to learning from external reviews, including peer review, safeguarding assurance visits and practice challenge sessions. The 'monthly highlight audit report' identifies themes of improving practice and areas for further development. There is clear evidence that issues identified for improvement result in key learning actions and better practice, for example the inclusion of fathers in assessments, plans and interventions, and the use of safety plans for children who experience domestic abuse, from recently published serious case reviews.
45. At all levels of the service, there is effective management oversight and grip. Inspectors did not find any children living at risk of actual harm; rather, they found decisive timely action to protect children. Permanence planning is tightly managed strategically, and is overseen effectively by senior managers, who know children well. Vigorous checks on the progress of individual children through robust tracking systems are in place through, for example,

the monthly permanence summit meeting. A similar summit provides management overview of the progress of children on child in need plans for over six months and includes helpful discussions to improve outcomes.

46. A strong emphasis on developing the social work academy and nurturing newly qualified social workers (NQSWs) encourages more to remain in the local authority. For example, the council kept additional staff capacity as advanced practitioners to support NQSWs to improve their knowledge, skills and confidence. The use of 'frontline' and 'step up to social work' and Open University degrees for non-qualified staff has enabled the local authority to develop a strong and increasingly permanent workforce.
47. Staff morale is high. Staff influence developments and are included in decisions, for example the introduction of a restorative model of practice. Staff want to work in Tower Hamlets, and many agency staff are converting to permanent contracts. The local authority has invested in staff to ensure that caseloads are manageable; this enables children to build trusting relationships with social workers and creates the right environment for good practice.



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<p><b>Cabinet</b></p> <p>31 July 2019</p>	 <p><b>TOWER HAMLETS</b></p>
<p><b>Report of:</b> Will Tuckley, Chief Executive</p>	<p><b>Classification:</b> Unrestricted</p>
<p><b>Local Community Fund</b></p>	

<b>Lead Member</b>	<b>John Biggs, the Mayor Councillor Candida Ronald, Cabinet Member for Resources</b>
<b>Originating Officer(s)</b>	David Freeman, VCS Strategy Manager
<b>Wards affected</b>	All wards
<b>Key Decision?</b>	Yes
<b>Forward Plan Notice Published</b>	2 July 2019
<b>Reason for Key Decision</b>	Impact on Wards
<b>Strategic Plan Priority / Outcome</b>	<b>All</b>

## Executive Summary

This report presents proposals for funding fifty projects provided by voluntary and community sector (VCS) organisations through the Local Community Fund (LCF) for the period 1<sup>st</sup> October 2019 to 31<sup>st</sup> March 2023 amounting to £9.31m over the 42 month period.

Despite many councils reducing their funding for the voluntary and community sector, Tower Hamlets has protected the current level of spending investing £2.6m a year to fund LCF projects. Despite the high level of funding available, the programme was significantly oversubscribed with bids for 240 projects submitted by over 130 organisations totalling more than £10m a year. This is almost four times the available budget and has meant that some strong bids were unfortunately unsuccessful.

In addition to the LCF the council has also launched a new Small Grants Programme with grants of between £200 and £5,000 available for projects running for up to 12-months. Larger grants of £20,000 are available through the community cohesion theme.

In light of the historical challenges the council has faced with regards to its previous Mainstream Grants (MSG) programme, including the Government's removal of the councils grant making powers under the previous Mayor, the council has adopted a

new and enhanced process of assessment for the LCF. This report sets out the robust and independent process which was undertaken to assess the bids including external double assessment and moderation followed by a detailed equalities impact assessment and mitigation process.

The recommended programme will support a wide range of VCS activities across five themes which were agreed by Cabinet in 2018. The proposed programme will contribute to achieving the outcomes for local residents set out in the Tower Hamlets Plan and the Council's Strategic Plan and will be flexible and responsive in meeting complex local needs.

The development of the programme, the bidding process and the assessment of bids are set out in the report, highlighting the high levels of participation of the VCS in all aspects from the initial co-production of the policy framework of the LCF through to the assessment criteria and scoring.

Some activities currently funded through MSG will not be funded through the Local Community Fund. Some of these may be significant, good quality services which no longer meet highest priority needs but which are, none the less, valued by the people who use them. The council recognises that in any period of change it is important to ensure that this happens in a managed, orderly way and that, as far as possible, adverse impact on the sustainability of organisations and quality provision for their service users is mitigated. This report sets out a range of measures to help support organisations and their service users during this transitional period.

A thorough assessment of the equality implications of the new programme has been undertaken. Where potential negative impacts have been identified the report sets out proposals at 3.55 and 3.56 for mitigation including recommendations to establish new themes in our Small Grants Programme to support projects which combat social isolation of older people, particularly in BAME communities, and to provide referral gateways for people from BAME communities. The report also recommends targeted commissioning of projects to meet thematic gaps in the proposed LCF programme including:

- early intervention and support for families leading complex lives particularly with children with disabilities;
- support for young carers, and
- support for young people with mental health issues.

The report and Equality Analysis also sets out the geographic distribution of services which will be provided through the LCF programme.

## **Recommendations:**

The Mayor in Cabinet is recommended to:

1. Agree the Local Community Fund programme and funding to individual organisations as set out in appendix F of this report for a period of 42 months from 1<sup>st</sup> October 2019 to 31<sup>st</sup> March 2023, subject to agreement of detailed funding agreements setting out the outcomes the funded projects are expected to achieve and conditions of funding
2. Agree that transitional arrangements will be put in place for funded organisations set out in paragraphs 3.54 to 3.58
3. Note the Equality Analysis and the specific equalities considerations as set out in paragraph 4 and to agree the Equality Analysis Action Plan set out in appendix A

## **1 REASONS FOR THE DECISIONS**

- 1.1 The council has made a commitment in its Voluntary and Community Sector (VCS) Strategy 2016-19 to supporting a vibrant and sustainable voluntary sector in the borough. As part of this commitment the council has undertaken to continue to support the VCS through specific funding programmes to enable VCS organisations to participate in the delivery of high quality public services to local residents.
- 1.2 The council's principal funding stream specifically for services provided by the VCS, the Mainstream Grants Programme, ends on 30<sup>th</sup> September 2019. The Local Community Fund, alongside the Small Grants Programme, is intended to replace the Mainstream Grants Programme (MSG) at the current level of £2.66m per annum.

## **2 ALTERNATIVE OPTIONS**

- 2.1 The council could decide to cease specific funding directed towards supporting services and activities delivered by VCS organisations. However, the council agreed in 2016 a VCS Strategy which recognises the unique place of the VCS in the local community continues the commitment of the council to supporting services and activities delivered by VCS organisations.
- 2.2 The council could decide it wishes to fund a programme different from that recommended. The LCF programme is based on a policy framework co-designed with the VCS and previously agreed at Cabinet, invitations to bid to funding schemes developed from that framework, the assessment of bids based on agreed criteria, an analysis of the equality considerations relating to the programme and the principles of best value. If the council decided it wished to fund an alternative programme, the approach to developing such a

programme would need to be significantly different from the LCF. Pursuing this option would also require consideration of the impact of the current funding programme coming to an end without an agreed replacement or the extension of MSG funding for a further period.

### **3 DETAILS OF THE REPORT**

#### **Summary**

- 3.1 This report presents proposals for a new funding programme, the Local Community Fund, which replaces the former Mainstream Grants programme. The proposed programme includes a diverse range of projects which meet the priority areas and outcomes of the LCF programme. Of the 50 projects recommended for funding, 15 are new projects from organisations which have not been supported through the MSG programme. Others are new projects from organisations the council has funded previously or developments of projects funded through MSG.
- 3.2 The number of good quality bids to the programme was high with 240 projects submitted by more than 130 organisations. The range of bids covered almost all of the priority service areas set out in the LCF prospectus. Inevitably the programme has been heavily oversubscribed with over £10m of bids against an annual budget of £2.66m. Many bids were from organisations which have not been funded previously by the council and most were local. Of the 20 organisations which submitted bids and are based outside the borough, the majority already work in Tower Hamlets or have strong connections through local partners.
- 3.3 Developed with a very high level of participation from VCS organisations through the co-production of the LCF framework, themes and priorities, this programme illustrates the changing relationship between the council and the VCS with increasing levels of confidence and trust and a positive commitment from the VCS to be involved in the transformation of public service and the delivery of high quality outcomes for local residents.
- 3.4 Transitional arrangements are set out to help ensure a smooth transition for service users of MSG projects which may not be funded through the LCF. These arrangements also form part of the mitigation of some of the issues highlighted in the equality analysis.

#### **Context**

- 3.5 The council is committed to supporting a vibrant, innovative and sustainable voluntary and community sector in Tower Hamlets which is equipped to deliver activities that are flexible and responsive in meeting complex local needs. These activities will contribute towards achieving the outcomes for local residents set out in the Tower Hamlets Plan and the council's Strategic



Plan. The model of change set out in the Tower Hamlets Plan underpins the principles of new LCF funding proposals with a focus on outcomes and assets rather than prescriptive solutions, prevention through early intervention and greater integration of services.

- 3.6 The LCF funding proposals also reflect the vision set out in the VCS Strategy committing the council to working towards achieving, *“an independent and sustainable voluntary and community sector, working closely with the council and partners to meet the needs of local people wherever they live in the borough”*.
- 3.7 The LCF programme of £2.66m is a comparatively small proportion of the total financial support to the sector but it provides an important source of funding to the small and medium size VCS organisations and helps leverage other funding sources for the borough. Since 2008, in England and Wales, local authority support for small and medium size charities has fallen nationally by 44% (Lloyds Foundation report *“Small and Medium Size Charities After the Crash”*). In this context, Tower Hamlets has been one of the local authorities which have striven to maintain support for local VCS organisations and, through a focus on building the capacity of the sector, encouraged expansion and growth. The VCS Strategy sets out the total level of support to the sector through grants, rate relief and service contracts amounting to £59m, including £24m support to housing associations for services such as supported accommodation.
- 3.8 The two VCS funding programmes, Local Community Fund and Small Grants, present a new approach to funding the sector focused on co-production delivering outcomes for local people and a more effective use of the limited resources available, recognising the value the VCS can bring to delivering better outcomes for local residents.
- 3.9 The framework, rationale and approach for the Local Community Fund programme was developed in co-production with the VCS and agreed by the Mayor in Cabinet on 20<sup>th</sup> March 2018. The report sets out the rationale for moving from a traditional grant based programme of support to the VCS towards a new funding approach which reflects the development of good practice in open and transparent funding of services from the VCS required by the Commissioners. As previously noted, this commitment to implementing change has contributed towards the lifting of the Direction by the government. In particular, the proposals for the Local Community Fund programme put in place robust governance and the separation of officer and Member responsibilities which the Local Government Association (LGA) Peer Review recognised as good practice and as a safeguard against some of the issues which gave rise to the Direction imposed by Secretary of State in 2014.
- 3.10 The principles of the new funding programme were developed in 2018 through an extensive programme of discussion and consultation with the VCS and other stakeholders. The key principles agreed at Cabinet were:

- a. The programme will be a new range of services funded by the council and co-produced with the VCS. The time available before the new programme starts allows an opportunity to ensure it takes into account good practice and learning from current MSG provision in deciding what should be funded in future.
- b. The programme will, as far as possible, operate as a single coordinated entity, with a coherent approach to funding and common approach to the programme's outputs and outcomes across the different themes for delivery.
- c. The programme is being developed with consideration of the council's new Grants Policy and existing strategic priorities. This maximises impact and avoids funding overlap, as well as supporting the delivery of the Tower Hamlets Plan and Strategic Plan
- d. The proposed new programme will fit with the council's wider Commissioning Framework and Co-production Framework recommendations, currently being developed.
- e. The programme will adopt an outcomes based approach, allowing organisations to build on local knowledge, skills and expertise and have the flexibility to undertake the activities which have the most impact.
- f. The programme is intended to stimulate greater and more effective support in tackling local issues. This principle will inform the determination of the programme budget.
- g. The bidding process will be transparent and fair.

3.11 Following further work with the VCS a second report was presented to Cabinet on 31<sup>st</sup> October 2018 which set out:

- a. The structure and outcomes framework for the Local Community Fund programme;
- b. Proposals for continued engagement with the voluntary and community sector in the co-production of the programme, and
- c. Noted the new programme represented a change in the approach to commissioning previously agreed.

## Local Community Fund Framework

3.12 The detail of the Local Community Fund programme is set out at appendix B. The programme is set out in five Themes which are sub divided into more detailed Schemes. These are set out in the table below.

Theme	Scheme
Inclusion, Health and Wellbeing	Scheme 1A – Children, Young People and Families
	Scheme 1B – Older People
	Scheme 1C – Access, information and self-management
	Scheme 1D - Healthy living and healthy choices
	Scheme 1E – Improved inclusion, health and well-being outcomes for disabled people and people experiencing mental health issues
Digital Inclusion and Awareness	Scheme 2A – ICT skills and digital careers
	Scheme 2B – Online Safety
	Scheme 2C - Improving health and wellbeing facilitated through digital platforms
Advice and Information	Scheme 3A - Advice and Information
Employment and skills	Scheme 4A - Developing and embedding good practice in the work place for people with disabilities, learning difficulties and physical and mental health barriers to work
	Scheme 4B - Reducing barriers to employment for disadvantaged groups
	Scheme 4C - Support focused on increasing access to art and cultural industries
Community safety	Scheme 5A – Reduction in the exploitation of children, young people and other vulnerable groups
	Scheme 5B – Improving the perception of young people in the community
	Scheme 5C – Services for people affected by domestic violence or other unsafe circumstances

3.13 Each scheme set out key priorities and high level outcomes which organisations were required to demonstrate their projects would contribute towards. This approach is different from previous funding programmes where the type of service was more prescriptive and more outputs focussed. This change in approach allows greater flexibility for the sector to develop new ideas and approaches towards achieving better outcomes for Tower Hamlets residents.

## Budget allocation

- 3.14 The proposed budget allocation to the Local Community Fund Programme agreed at Cabinet on 31<sup>st</sup> October 2018 is £2.66m. This is based on maintaining the current level of expenditure for MSG themes 1, 2 and 3.
- 3.15 A commitment to maintain current levels of expenditure on VCS services in a period of financial challenge for the council reflects the value placed on projects provided by the sector as set out in the VCS Strategy and the longer term benefits to local residents of maintaining a dynamic and effective VCS. Underspend and some undercommitment in the existing MSG budget allows some savings to be made while maintaining actual expenditure. The anticipated savings amount to approximately £180,000, 6% of the current budget.
- 3.16 The programme includes two new themes, Community Safety and Digital Awareness and Inclusion, which were not explicitly included in the MSG programme. An allocation has been made to each of these themes based on a reallocation of 10% of the available budget.
- 3.17 The co-production exercise also highlighted the increasing need for information and advice and the role VCS providers can play in delivering quality services to communities through both generic services and specialist targeted activity. The overall allocation to the Information and Advice theme was increased by 10%.
- 3.18 The allocation of the £2.66m annual budget to each LCF Theme is set out below. Spend will be reported on as part of the monitoring and evaluation process for the programme.

Budget Allocation						
	Inclusion, Health and Wellbeing	Digital Inclusion	Information and Advice	Employment and Skills	Community Safety	Total
	£,000	£,000	£,000	£,000	£,000	£,000
Theme Total	990	60	980	435	195	<b>2,660</b>

## Developing the LCF prospectus

- 3.19 The council is committed to increasing the involvement of local people in the way services are designed and delivered. This has been demonstrated through the approach to developing the LCF from first principles through to the detail of the assessment and scoring criteria for bids to the programme.
- 3.20 Some of the developmental work carried out with the VCS and other stakeholders has been reported previously to Cabinet in March and October 2018. Appendix C sets this out in detail and describes the work carried out with the sector to shape the final programme, demonstrating the breadth of

involvement across the VCS and other partner agencies such as the Clinical Commissioning Group (CCG).

- 3.21 Some of the key points detailed in the appendix are:
- a. Six public events were held in the spring of 2018 to develop the LCF framework and priorities attended by an average 50 organisations;
  - b. Six thematic workshops held during the autumn of 2018 with a seventh general session to develop the themes and high level outcomes with average attendance of over 30 organisations at each session;
  - c. Two further sessions were held early in 2019 to finalise the outcomes and develop the prospectus for the LCF including the assessment and scoring criteria;
  - d. 124 different organisations participated in the sessions during the autumn of 2018 and early 2019 with most attending several times;
  - e. Participation was not limited to those which intended submit bids to the LCF. Only half of the organisations which participated in the co-production subsequently submitted a bid.
- 3.22 Participation was not limited to council run public events. Organisations were encouraged to contribute via email and one to one conversations as well as events organised by Tower Hamlets Council for Voluntary Service (THCVS) and Volunteer Centre Tower Hamlets (VCTH).

### **Bidding process**

- 3.23 The LCF opened for bidding on 25th March. The programme was open for eight weeks, slightly longer than previous funding rounds which have typically been four to six weeks. It was promoted through direct mailing to over 500 individual VCS contacts by the council, via the THCVS mailing list, through other VCS networks, through the council's website and social media. Members were offered the opportunity of a briefing on the LCF to assist them to promote the programme in their local areas. Periodic updates were circulated during the period the programme was open to bidding
- 3.24 Organisations were required to bid through the on line process which the council has used for previous funding programmes and which is also used by a number of other funders such as Children in Need and the Esme Fairbairn Foundation. All of the documentation relating to the programme including forms, guidance, the assessment criteria and the individual funding Schemes were posted on the council's website with a widely promoted 'quick link' to the relevant pages. To streamline the process for organisations which might wish to submit a number of projects, two separate forms were required. The information relating to the organisation, its governance and management were included in a form which organisations were asked to submit only once and a second form was used for information relating to each individual project.
- 3.25 Training and support was provided by the council, THCVS and VCTH staff. The programme is set out in detail in appendix D.

- 3.26 There was a very high level of participation in the training and support sessions with a total of 167 separate organisations attending council run sessions and 211 attending those run by THCVS. Taking account of overlap, in total 290 organisations participated.
- 3.27 Overall attendance was high and indicates the promotion of the programme across VCS was effective. However, of the 71 organisations listed as main grant holders under the MSG programme just under three quarters attended at least one event by either THCVS, the council, or both. To some extent this may be because some organisations decided to bid as a consortium so only one might have attended council or THCVS events and others may have felt they were familiar with the process and therefore did not need to attend.
- 3.28 Three quarters of the organisations that applied to the LCF attended either council or THCVS events. 90% of the organisations recommended for funding attended.
- 3.29 The programme closed for bids at 12.00 noon on 17<sup>th</sup> May. As agreed at Cabinet on 31<sup>st</sup> October 2018, arrangements had been made for the bids to be externally assessed. Following a formal procurement exercise the successful bidder for this work was the East End Community Foundation (EECF). EECF has previous experience as the external assessor for the current MSG programme, the assessor for the Tackling Poverty grants programme and managing the council's Small Grants Fund programme. Through its network of other community foundations, charitable trusts and freelance funding assessors EECF has access to experienced grants assessors with the broad range of skills and experience required to properly assess a programme as diverse as the LCF. The council supported the training of the assessors and officers were available to respond to queries throughout the process.
- 3.30 The EECF used the criteria and scoring developed by the council with the VCS earlier this year which was published as part of the LCF prospectus on the council website (Appendix E). A standard double assessment and moderation methodology was used. The moderation was carried out by EECF staff with external assessors and the CEO of THCVS.

### **Assessment of bids**

- 3.31 239 eligible bids were received from 131 organisations. Of these, six organisations failed to pass the organisational assessment. The bids submitted by these organisations were assessed but none were sufficiently high scoring to be included in the recommendations for funding.

3.32 The total value of the bids received (amount per year) was over £10m, as set out below.

	<b>Bids received</b>	<b>Budget</b>
Theme 1 - Inclusion, Health and Wellbeing	5,168,178	900,000
Theme 2 - Digital Inclusion	221,991	60,000
Theme 3 - Information and Advice	1,556,150	980,000
Theme 4 - Employment and Skills	2,486,259	435,000
Theme 5 - Community Safety	637,747	195,000
<b>Total</b>	<b>10,070,327</b>	<b>2,660,000</b>

3.33 The total programme is approximately four times oversubscribed. Theme 3 was the least oversubscribed because most of the potential bidders submitted consortia bids.

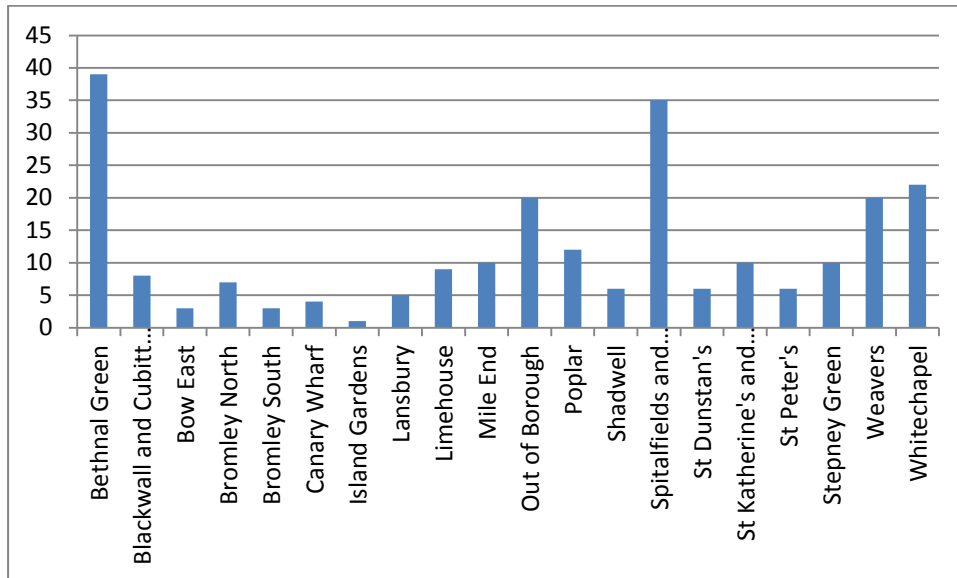
3.34 Themes 1 and 4 received the highest number of bids and are the most oversubscribed.

3.35 All of the schemes received bids though the numbers were low in some. With the exception of Information and Advice the numbers of bids were generally proportionate to the amount of funding available. Also, Digital Inclusion and Community Safety are new themes and therefore likely to attract a smaller number of bids with fewer established services seeking further funding.

3.36 Most of the priority areas identified in the schemes received bids. However, one, support for young carers, had no bids. The organisation which had previously supported young carers did not bid to continue this service and no alternative projects came forward. This is highlighted in the equality analysis.

3.37 The quality of bids was generally high but in some priority areas there were no appropriate bids and further consideration may need to be given to addressing these gaps. These are also highlighted in the equality analysis.

3.38 The table below shows the geographic distribution of where organisations which submitted bids are based. This shows that the majority of organisations which submitted bids are based in the borough. Only 20 bids (8%) came from organisations which are based outside of the borough and, of these, the majority are sub-regional groups such as the Citizens' Advice Bureau which cover a small number of east London boroughs.



3.39 The highest number of bids came from organisations based in Bethnal Green (30%) and Spitalfields and Banglatown (27%). Island Gardens had the lowest number with only one organisation based in that ward submitting bids.

3.40 Where an organisation is based is not necessarily the determinant of where its main beneficiaries may live. However, low numbers of VCS organisations in particular wards is an indicator of where the council might need to consider targeting resources to develop VCS activity.

### 3.41 **Proposed Programme**

3.42 The recommended funding set out in Appendix F provides a programme based on the principles agreed by Cabinet and endorsed by the VCS through its participation in the co-production of the LCF programme.



- 3.43 The programme includes a balance of new projects from organisations which are not currently funded, new projects from organisations which have been funded for other work and projects which develop and take forward existing funded services. These are set out below.

	<b>Theme 1</b>	<b>Theme 2</b>	<b>Theme 3</b>	<b>Theme 4</b>	<b>Theme 5</b>
<b>New project from non-funded org</b>	9	1	0	1	4
<b>New project from MSG funded org</b>	5	4	0	6	3
<b>Existing funded project</b>	13	0	2	2	0
<b>Total</b>	<b>27</b>	<b>5</b>	<b>2</b>	<b>9</b>	<b>7</b>

- 3.44 The annual levels of funding for each project range in size from the advice consortium of 11 providers at £930,000 to the £5,000 proposed for the Wapping Bangladesh Association digital inclusion project. The average level of funding for each theme is set out in the table below.

	<b>Theme 1</b>	<b>Theme 2</b>	<b>Theme 3</b>	<b>Theme 4</b>	<b>Theme 5</b>
<b>Number of projects</b>	27	5	2	9	7
<b>Average level of funding</b>	37,500	11,700	440,000	50,500	26,000

- 3.45 The projects which are recommended for funding are based on principles developed with the VCS as part of the co-production process:

- a. Primary determinant is the score against the agreed assessment criteria
- b. Funding recommended at the level requested
- c. Duplication must address additional need
- d. Capacity to address geographic differentials of need
- e. Analysis of impact on people with protected equality characteristics.

- 3.46 Each scheme was allocated a budget. While to some extent these budgets reflected the historic allocation of fund to service areas, they also indicated the likely capacity of VCS organisations to deliver in these areas. The recommendations set out in Appendix F reflect the scores achieved by projects and the range of projects which could be funded within the allocated budget taking account of the principle set out above.

- 3.47 There are a small number of exceptions. In one Digital Inclusion scheme (Theme 2 Scheme C) it was noted that the highest scoring bid was scored lower than bids in the other two Digital Inclusion schemes. This is a new theme and, on balance, officers consider that it would be more beneficial to reallocate the budget for Scheme C to fund projects in the other two schemes, both of which received more, and higher scoring, bids.

- 3.48 In Theme 1 Scheme A, the bid from East London Out benefits three schemes so this would be funded from the overall theme budget rather than being allocated to a particular scheme.
- 3.49 In some schemes where the available budget has been insufficient to fund the next highest scoring bid a lower cost project is recommended where the difference in score is only one or two points.
- 3.50 The geographic spreads of services which are recommended for funding are shown graphically in Appendix G. With limited funds available and bids not necessarily covering priority service areas across the borough, the proposed funding programme will inevitably have gaps. Some are considered in the context of the equality analysis below.
- 3.51 All of the schemes include recommended bids which have stated they will provide a borough wide service. An additional level of assessment has been carried out where organisations have claimed their proposals would have a borough wide reach to establish that there is reasonable evidence to support this. This evidence may be from previous council funding history, track record or other information contained in the funding bid. Officers will also ensure in the contract mobilisation that geographic areas of need are specifically addressed.
- 3.52 Many organisations whose bids are recommended are known to the council. In considering which bids to recommend, officers have reviewed past performance and record of delivery. None of the organisations whose bids are recommended have significant and persistent service delivery issues of sufficient concern to affect the recommendations. Future compliance and assessment arrangements will be proportionate based on risk. Past performance of existing funded organisation will be part of that assessment of risk.
- 3.53 The contract mobilisation process and ongoing compliance and assessment of successful bids will include considerations of risk, targeting of service provision and monitoring in the context of the council's statutory equality duties.

### **Currently funded services and Transitional Arrangements**

- 3.54 Some activities currently funded through MSG will not be funded through the Local Community Fund. Some of these may be significant, good quality services which no longer meet highest priority needs but which are, none the less, important in their communities. The council recognises that in any period of change it is important to ensure that this happens in a managed, orderly way and that, as far as possible, adverse impact on the sustainability of organisations and quality provision for their service users is mitigated.

- 3.55 To reduce the impact of change the council will:
- a. Give as much notice as possible when decisions are made to give organisations the opportunity to adjust to their new funding levels;
  - b. Work with organisations to seek alternative provision for service users where a service is significantly reduced or comes to an end;
  - c. Work with funded organisations especially at contract mobilisation to target and promote new services funded under LCF programme;
  - d. Support a programme of capacity building to increase organisations' chance of bidding successfully, provided by THCVS, the council and other providers;
  - e. Develop and launch a new Tower Hamlets funders forum to help identify and promote local funding sources;
  - f. Make available, through THCVS and other partners as appropriate, a programme of support available in advance of the end of MSG to help VCS organisations in the transition from MSG to either alternative funding or an orderly change in the level of service;
  - g. Continue the VCS Small Grants programme and link to other funders to provide funding opportunities for organisations to meet new and emerging needs and develop new ways of tackling existing needs
  - h. Promote and support Tower Hamlets Spacehive programme to help organisations to access crowdfunding;
  - i. Retain the Emergency Fund to help organisations meet the costs of transition, particularly those directly linked to lower levels of revenue funding, and
  - j. Develop specific equality mitigation as set out below
- 3.56 The support offered to organisations facing significant change and possible cessation of service will be a major element of the council's proposed mitigation of potential disproportionate negative impact on people with protected equality characteristics identified in paragraph 4 below. In order to help mitigate specific negative equality impacts the council will:
- a. Include a new theme in the Small Grants Programme to support projects which combat social isolation of older people, particularly in BAME communities, through day facilities which will be reviewed over time in the context of the development of the council's review of day care for older people;
  - b. Include a new theme in the Small Grants Programme relating to access and participation to establish schemes to provide referral gateways for people from BAME communities;
  - c. Provide transitional support where appropriate for services currently funded through MSG until funding is available from the new Small Grants programme themes identified above for alternative services where a significant equality impact is identified.
  - d. Provide transitional support for community language services currently funded through MSG pending the outcome of the wider review of community language services;
  - e. Address through targeted commissioning arrangements specific gaps in services identified in the equality analysis including:

- early intervention and support for families leading complex lives particularly with children with disabilities;
- support for young carers, and
- support for young people with mental health issues.

3.57 The report to Cabinet on 31<sup>st</sup> October 2018 identified that there would be savings to the council amounting to £180k per annum resulting from unallocated resources in the current MSG budget. The medium term financial strategy identifies these savings will be made in 2021/22. The unallocated £180k will therefore be available to support the transition activities identified above in 2019/20 and 20/21.

3.58 A further report will be brought forward setting out in detail the proposed new Small Grants themes and other transitional arrangements for individual organisations.

#### **4 EQUALITIES IMPLICATIONS**

4.1 An equality analysis has been carried out on the change from MSG funding to the Local Community Fund. The new programme recognises the role of the VCS in delivering services to local residents but the equality analysis should be seen in the context of the wider provision of services both by the council and by other public services. Reference has been made to this in the analysis in areas such as services for older people and community languages.

4.2 The equalities analysis on the new Local Community Fund has identified a number of equalities considerations.

4.3 There is a positive impact in a number of areas. Theme 5 Community Safety is a new funding theme. There are proposals to fund schemes which will support women and girls who are survivors of domestic abuse and sexual violence. Within Theme 2 Digital Inclusion there are proposals which will have a positive impact for older people, supporting them towards greater digital inclusion. The proposals also indicate a positive impact for people in the LBGT+ community through supporting services provided by East London Out (ELOP).

4.4 The analysis also identified some potentially negative impacts relating to age, race and disability.

4.5 For older people the lack of successful bids which specifically target older people in the south of the borough may have a disproportionate negative impact. Officers will address this by ensuring that the successful bidders which provide a borough wide service provide services in the areas of highest need for older people in the borough. This will be monitored through the council's regular analysis and development work with successful projects. In the longer term there is the potential that by not supporting some of the older peoples' services which are community led, particularly those led by people from BAME communities, services may close and an important contribution to

the council's developing strategy for older people's day care could be lost. Through the transitional arrangements set out elsewhere in this report the council will seek to ensure these specialist services may be supported in the future.

- 4.6 For young people, the absence of any bids to support young carers will reduce the level of support offered to young carers which has previously been provided through school based support. Officers will be seeking to meet this through extending other provision and/or identifying a potential new provider through the council's low value procurement process.
- 4.7 Loss of services which support families with very young children and new parents/parents-to-be who live complex lives, particularly where there are children in the family with disabilities, is a further area where there is a significant equality impact. This is a specialist area of work which the council will seek to address through targeted commissioning.
- 4.8 The recommended LCF programme does not include services promoting the mental health and wellbeing of young people. This is a significant equality consideration for both disability and age. The council will be seeking to mitigate this through targeted commissioning.
- 4.9 The wider issue of access and participation has been identified as a consideration in relation to race. There are services which have been provided by organisations led by members of the communities they serve such as the Somali and travellers of Irish heritage communities. While alternative services may be available through the LCF to meet the needs of these service users, some may choose not to use them for a range of reasons. It is therefore proposed that a new theme is developed for the Small Grants programme which addresses access and participation. This may allow, for instance, the development of gateway services run by local organisations recognised as focal points for communities which can refer to other more specialist services.
- 4.10 There has also been recognition through the equality analysis that the process of data collection in relation to equalities should be reviewed. This will be incorporated in the contract mobilisation process and reported as part of the ongoing compliance and assessment of LCF funded services.

## **5 OTHER STATUTORY IMPLICATIONS**

### **5.1 Best Value**

Recent legislation, particularly the Localism Act 2010, has emphasised the role of communities working in partnership with local authorities to help achieve more effective and less costly services to local people. The process of co-production of services delivered by local voluntary and community organisations is a tool now widely recognised as a means to achieving this outcome.

## 5.2 Risk Management

- a. Uncertainty will have an impact on staff morale in organisations currently funded through MSG. There is therefore a risk of the loss of experienced and skilled staff who seeks alternative employment if they perceive that their future employment is insecure. Timely decision making by the council will mitigate the potential impact of this risk, particularly ensuring that funding decisions are made in advance of MSG funded organisations issuing protective redundancy notices to staff at the end of the funding.
- b. The analysis of bids to the LCF was carried out to the council's specification by an external provider after a formal tendering process. The management of risk in the external assessment process has included;
  - The development of clear and transparent assessment criteria and scoring with the VCS which were published as part of the LCF prospectus;
  - Participation in the training of external assessors;
  - Regular liaison with the external assessment manager to resolve queries;
  - Moderation of bid assessments and sample testing, and
  - Inclusion in the council's internal audit programme to verify the robustness of the process.

## 5.3 Crime Reduction

The specific theme relating to Crime and Disorder will ensure that through the Local Community Fund new services will be delivered to reduce crime and disorder. The priorities for the theme are:

- a) People affected by domestic violence;
- b) Exploitation of children, young people and vulnerable groups, and
- c) The perception of young people in the community

The services recommended for each priority are listed in Theme 5 in the proposals set out in Appendix F

## 5.4 Safeguarding

There are no specific safeguarding implications arising from this report. However, ensuring appropriate consideration is given to safeguarding will be addressed in the development of the Local Community Fund programme, both through governance requirements and in the capacity building programme for the sector proposed.

## **6. COMMENTS OF THE CHIEF FINANCE OFFICER**

- 6.1 This report details the progress to date and next steps in developing the new local community fund programme that will replace the current mainstream grants programme. This work has been carried out through existing resources within the (Strategy, Policy, Performance) SPP team.
- 6.2 Details on budget allocation are provided in section 3.23 above. The current MSG budget totals £3.2m per annum. It is proposed that £2.66m of this will be channelled through the local community fund programme and potential savings of £180k are proposed, arising from resources not previously allocated and which therefore does not impact on existing approved programmes. The saving is included as part of the Council's Medium Term Financial Strategy proposals for 2020-21.

## **7. COMMENTS OF LEGAL SERVICES**

- 7.1 The council has the legal power to fund organisations in the manner referred to in this report as it relates to the carrying out of various functions of the council notwithstanding the fact that the council also has the General Legal Power Of Competence derived from the Localism Act 2011.
- 7.2 The council also has the legal duty to ensure that the functions it delivers and therefore any agreements it enters into for the delivery of those functions represent Best Value having regard to the Efficiency, Effectiveness and Economy of those agreements.
- 7.3 The council widely advertised the opportunity to obtain funding and set pre-determined evaluation criteria against which applications would be measured. The criteria were designed to ensure that the resultant winning applications were aimed to meet specific council functions and therefore ensure that the money spent would be efficient and effective. The resulting expenditure will also be subject to a legal agreement which has been designed in part to protect the use of the funds and ensure that the money is used for the purposes for which it is intended. Monitoring of this agreement together with the pre-mentioned activities significantly demonstrates compliance with the council's Best Value duty.
- 7.4 The setting of pre-published criteria followed by evaluation of bids against those criteria by an independent contractor to the council demonstrates that the council has determined the successful applicants in a fair and transparent way and in a manner which is consistent with that expected of a similar authority.
- 7.5 The resultant contracts are not Public Services Contracts for the purposes of European Law. This is because there is no pecuniary interest for the successful organisations in the legal agreement. However, the council has voluntarily followed a number of aspects of the relevant procurement law particularly around selection and evaluation in order to demonstrate

compliance with the general European principles of fairness, transparency and non-discrimination.

- 7.6 Executive Decisions relating to the making of grants are usually made by the Mayor as part of the Grants Determination (Cabinet) Sub-committee. However, as the delegator of the decision making function to the sub-committee the Mayor is also legally entitled to make the decision in respect of these report recommendations in the main cabinet meeting.
- 7.7 Similarly, the previous report delegated to the Chief Executive the decision making authority to agree the recommendations in this report. However, under administrative law the Mayor as original delegator is legally entitled to make this decision nonetheless.
- 7.8 The council has also complied with its duties under the Equality Act 2010. As part of this final stage, the list of potential successful applicants has been externally assessed and the effects on persons with a protected characteristic has been considered. This has been taken into account when reaching the recommendations of this report. Also assessment by the council has been undertaken prior to agreeing each stage of the process. For example, the setting of the policy and agreeing the prospectus and evaluation criteria and this demonstrates compliance with the act.

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## **Linked Reports, Appendices and Background Documents**

### **Linked Report**

NONE

### **Appendices**

- Appendix A Equality Analysis
- Appendix B LCF Themes and Schemes
- Appendix C Co-production and consultation
- Appendix D Training and support
- Appendix E Assessment Criteria
- Appendix F Recommended projects
- Appendix G Geographic distribution of services (maps)

### **Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012**

- NONE

### **Officer contact details for documents:**

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# Equality Analysis (EA)

Financial Year  
**2019/20**

Current decision  
rating  
**Amber**

## Section 1 – General Information (Aims and Objectives)

**What's the proposal?** What is the change we are trying to analyse the impact of?

The Council is committed to supporting a vibrant, innovative and sustainable voluntary and community sector in Tower Hamlets which is equipped to deliver activities that are flexible and responsive in meeting complex local needs. These activities will contribute towards achieving the outcomes for local residents set out in the Tower Hamlets Plan and the Council's Strategic Plan. The model of change set out in the Tower Hamlets Plan underpins the principles of new VCS funding proposals with a focus on outcomes and assets rather than prescriptive solutions, prevention through early intervention and greater integration of services.

The Local Community Fund has been established to provide an outcomes focussed VCS funding programme as part of the replacement of the current Mainstream Grants programme which comes to an end on 30th September 2019. It will sit alongside the corporate VCS infrastructure support programme and the Small Grants Programme as the principal VCS funding programme from the council.

The council's approach to future funding of the VCS was set out in the VCS Strategy 2016-19. An outcomes focussed approach with funding programmes developed through a process of co-production with the sector was at the heart of the new strategy with a clear distinction between traditional grants which might be appropriate in very limited and defined circumstances and funding more akin to public sector procurement.

The principles of the new funding programme were developed in 2018 through an extensive programme of discussion and consultation with the VCS and other stakeholders. The outcome of this was reported to Cabinet on 20th March 2018. The agreed key principles were:

- a. The programme will be a new range of services funded by the Council and co-produced with the VCS. The time available before the new programme starts allows an opportunity to ensure it takes into account good practice and learning from current MSG provision in deciding what should be funded in future.
- b. The programme will, as far as possible, operate as a single coordinated entity, with a coherent approach to funding and

- common approach to the programme's outputs and outcomes across the different themes for delivery.
- c. The programme is being developed with consideration of the new Council Grants Policy and existing strategic priorities. This maximises impact and avoids funding overlap, as well as supporting the delivery of the Tower Hamlets Plan and Strategic Plan
  - d. The proposed new programme will fit with the Council's wider Commissioning Framework and Co-production Framework recommendations, currently being developed.
  - e. The programme will adopt an outcomes based approach, allowing organisations to build on local knowledge, skills and expertise and have the flexibility to undertake the activities which have the most impact.
  - f. The proposed new programme is intended to stimulate greater and more effective support in tackling local issues. This principle will inform the determination of the programme budget.
  - g. The bidding process will be transparent and fair.

Following further work with the VCS a second report was presented to Cabinet on 31st October 2018 which set out:

- a. The structure and outcomes framework for the proposed Local Community Fund programme;
- b. Proposals for continued engagement with the voluntary and community sector in the co-design of the programme, and
- c. Noted the new programme represented a change in the approach to commissioning previously agreed.

#### Local Community Fund Framework

The detail of the Local Community Fund programme is set out at appendix B. The programme is set out in five broad Themes which are sub divided into more detailed Schemes. These are set out in the table below.

Theme	Scheme
Inclusion, Health and Wellbeing	Scheme 1A – Children, Young People and Families
	Scheme 1B – Older People
	Scheme 1C – Access, information and self-management
	Scheme 1D - Healthy living and healthy choices
	Scheme 1E – Improved inclusion, health and well-being outcomes for disabled people and people experiencing mental health issues
Digital Inclusion	Scheme 2A – ICT skills and digital careers

and Awareness	
	Scheme 2B – Online Safety
	Scheme 2C - Improving health and wellbeing facilitated through digital platforms
Advice and Information	Scheme 3A - Advice and Information
Employment and skills	Scheme 4A - Developing and embedding good practice in the work place for people with disabilities, learning difficulties and physical and mental health barriers to work
	Scheme 4B - Reducing barriers to employment for disadvantaged groups
	Scheme 4C - Support focused on increasing access to art and cultural industries
Community safety	Scheme 5A – Reduction in the exploitation of children, young people and other vulnerable groups
	Scheme 5B – Improving the perception of young people in the community
	Scheme 5C – Services for people affected by domestic violence or other unsafe circumstances

Each scheme set out key priorities and high level outcomes which organisations were required to demonstrate their projects would contribute towards. This approach is different from previous funding programmes where the type of service was more prescriptive and more outputs focussed. This change in approach allows greater flexibility for the sector to develop new ideas and approaches towards achieving better outcomes for Tower hamlets residents.

The Council has also set out a need to co-design with residents who use services, volunteers, staff and other stakeholders to develop the way projects are run. Co-design processes should not be rushed and will be implemented throughout lifetime of the programme. We recognise that some organisations will be more familiar with the language of co-design and co-production than others, and that some projects, through actively involving and working with people who use their services, may already have co-design principles embedded in their work. Advice and training on co-design will be available to all funded projects and for the wider sector.

#### Developing the LCF

The council is committed to increasing the involvement of local people in the way services are designed and delivered. This has been demonstrated through the approach to developing the LCF from first principles through to the detail of the assessment and scoring

criteria for bids to the programme.

Some of the developmental work carried out with the VCS and other stakeholders has been reported previously to Cabinet in March and October 2018. Appendix C of the main report sets this out in detail and describes the work carried out with the sector to shape the final programme, demonstrating the breadth of involvement across the VCS and other partner agencies such as the Clinical Commissioning Group (CCG). Some of the key points detailed in the appendix are:

- a. Six public events were held in the spring of 2018 to develop the LCF framework and priorities attended by an average 50 organisations;
- b. Six thematic workshops held during the autumn of 2018 with a seventh general session to develop the themes and high level outcomes with average attendance of over 30 organisations at each session;
- c. Two further sessions were held early in 2019 to finalise the outcomes and develop the prospectus for the LCF including the assessment and scoring criteria;
- d. 124 different organisations participated in the sessions during the autumn of 2018 and early 2019 with most attending several times;
- e. Participation was not limited to those which intended submit bids to the LCF. Only half of the organisations which participated in the co-design subsequently submitted a bid.

Participation was not limited to council run public events. Organisations were encouraged to contribute via email and one to one conversations as well as events organised by THCVS and the Volunteer Centre.

### **High level needs analysis**

The London Borough of Tower Hamlets has one of the fastest growing, youngest and most diverse populations in the UK. As of June 2018 the borough had 317,705 residents. The population is projected to reach 365,200 by 2027 and 400,000 by 2041. Its population is the 4th youngest in the UK with almost half of residents being aged between 20 – 39 years.

Coupled with a young and growing population is the fact that Tower Hamlets has high levels of deprivation and in terms of its average deprivation score is the 10th most deprived local authority in England. It has the highest rate of pensioner poverty in England with half of all residents aged 60 and over living below the poverty line; more than three times the national rate. Child poverty in Tower Hamlets is also the highest in Great Britain with 31 percent of children living in families below the poverty line, which is almost double the national rate.

It is estimated that around four in ten households in Tower Hamlets are living below the poverty line after housing costs are taken into account. This is the highest poverty rate across all local authorities in England and Wales and almost double the national average (39 vs 21 per cent).

Almost four in five children in the borough live in families reliant on tax credits, which provide means-tested support for in-work and out-of-work families. This is the highest rate in Great Britain and is almost double the proportion that is technically below the poverty line.

Linked to the above are the severe health inequalities that exist in Tower Hamlets. Healthy life expectancy of both men and women in the borough is lower than the London and England averages. The borough also has a higher rate of death considered preventable or premature than rates in London and England.

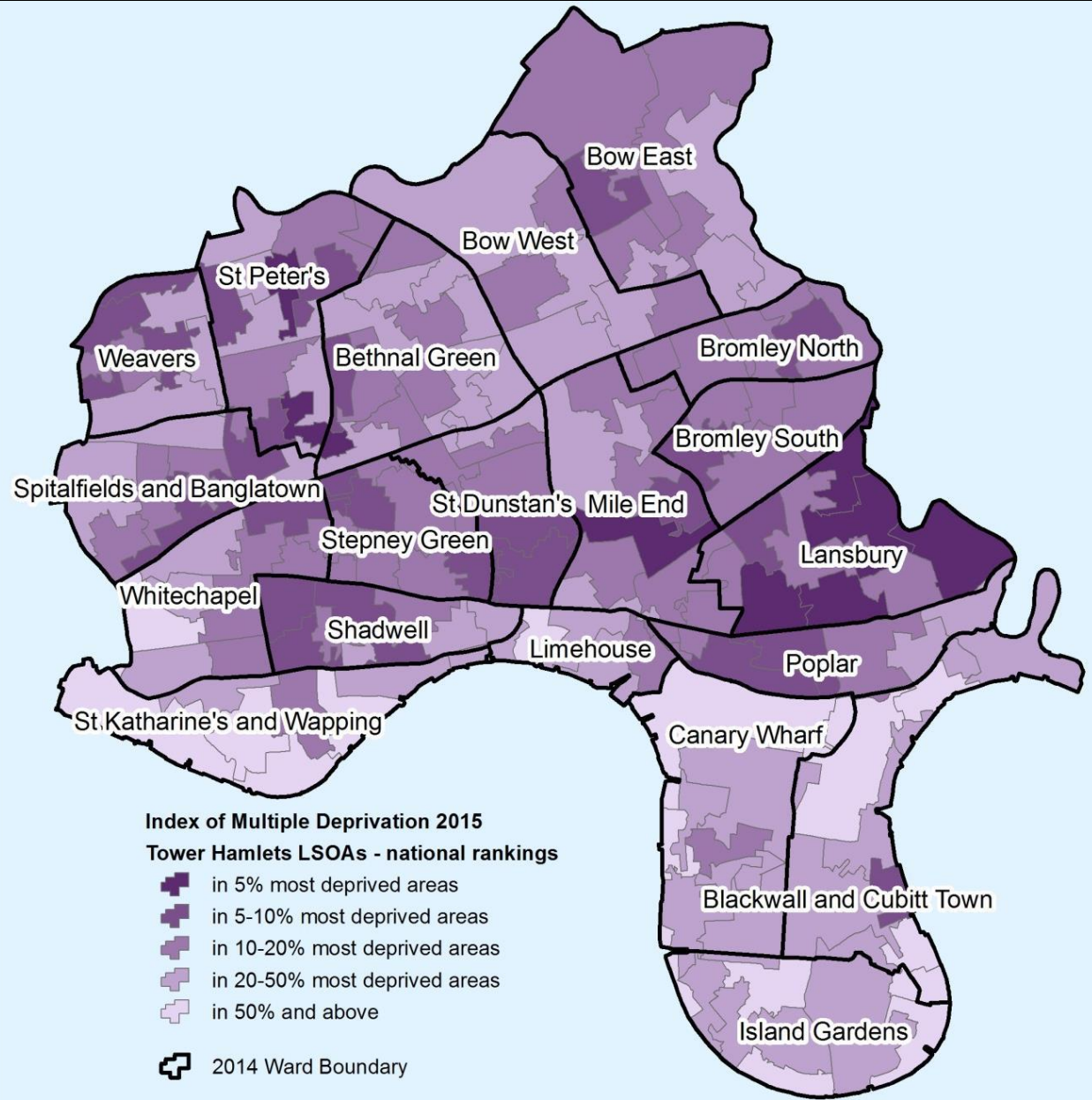
With more than four in ten residents being born outside the United Kingdom Tower Hamlets is ranked as the 16th most ethnically diverse local authority in England in terms of the mix of different ethnic group populations. More than two thirds of Tower Hamlets residents belong to minority ethnic groups. The single biggest migrant group are residents born in Bangladesh but the most significant population growth in recent years has been among EU nationals.

The diverse nature and high levels of deprivation in Tower Hamlets means that our residents are particularly vulnerable to the potential impacts of inequality and any proposed change to services needs to ensure that the impact on persons who share a protected characteristic are mitigated.

Deprivation is widespread in Tower Hamlets: more than half (58 per cent) of the borough's 144 Lower layer Super Output Areas (LSOAs) are in the most deprived 20 per cent of LSOAs in England, according to the *Index of Multiple Deprivation*.

- One quarter (24 per cent) of Tower Hamlets LSOAs are in the most deprived ten per cent of LSOAs in England.
- Within the borough, the most highly deprived areas – which fall into the five per cent most deprived LSOAs nationally – are mainly clustered in the East of the borough in the Lansbury and Mile End area. The least deprived areas in the borough are in the riverside areas of St.Katharine's Dock, Wapping, and the Isle of Dogs.
- To complement the 'official' data at LSOA level, the LGA has produced IMD estimates for wards. The four wards in the East of the borough - Lansbury, Bromley South, Mile End, and Bromley North – are the most deprived wards within the borough on the IMD. Two thirds of the borough's wards (13 out of 20) are in the most deprived ten per cent of wards in England.
- While deprivation in Tower Hamlets is widespread, none of the borough's LSOAs appear in the most severely deprived areas in **England** (ie the most deprived one per cent of areas)

The borough map below shows the distribution of indices of multiple deprivation across the borough.



## Theme 1 Inclusion, Health and Wellbeing

The Tower Hamlets Plan 2019-23 sets out the borough's vision for inclusion, health and wellbeing:

We are committed to improving the health and wellbeing of our local population and the quality of the care services they receive. At the heart of this is ensuring our services are person-centred, empowering and that they make a tangible and positive difference to people's lives. We are committed to providing co-ordinated, joined-up services that enable people to have greater independence and more control over their care. Using information, advice, technology and support we will help people to manage their health conditions. We aim to give the people of Tower Hamlets one of the best systems of interconnected health and care in the country. We are delivering this through the Tower Hamlets Together (THT) partnership which brings together providers, commissioners, the community and voluntary and statutory sector, to improve the quality of life for our residents.

Through further close partnership working, prevention, early intervention and working with our communities, we will tackle health inequalities, improving the quality of life for our residents and managing demand for services. We know that achieving better health and wellbeing is much wider than improving our health and care services. It involves taking a holistic approach to everything that impacts on how we feel, from good quality housing to accessible parks and open spaces. We know we can achieve improved physical and mental health by providing spaces for people to be active and enjoy.

The VCS has a unique role in helping to achieve that vision through innovative community focussed services co-designed with local residents. This theme sets out the priority areas where VCS organisations are well placed to make a significant impact.

For the Local Community Fund the council uses the following definitions in relation to young people:

- 'Children under 5' includes young toddlers and infants and can also cover pregnancy
- 'Children' covers the ages 5-12
- 'Young people' covers 12-18 but there is some flexibility at the lower and upper end of this scale where need can be demonstrated and services can be of clear benefit.
- Children and young people includes those who have special educational needs and/or who are disabled (SEND)
- 'Older people' includes 'younger older' people aged 50 +
- 'Disabled People' includes people with a wide range of physical, mental, cognitive and sensory impairments, disabilities, learning disabilities and long-term health conditions

### Geographic Spread

Bids may be submitted for borough wide projects or for projects which are specific to a defined geographic area.

Scheme 1A – Children, Young People and Families

## Priorities

1. Increase access to Youth Services

In this priority we are looking in particular to increase the use of youth services by girls and young women

2. Provision of Early Help support to families

In this priority we are looking in particular to support activities which will improve Early Help Assessment outcomes

3. Support for young carers

In this priority we are looking in particular to support activities which the health and wellbeing of young carers in the borough

## Outcomes

1. Children and young people, in particularly girls and young women:
  - a. have more confidence in themselves;
  - b. are more resilient, and
  - c. are able to, and do, access a range of spaces, activities and social opportunities across Tower Hamlets.
2. Girls and young women feel included, are able to participate in any service, and are more likely to train to become youth leaders and/or develop their own initiatives.
3. Children and young people who may feel excluded from participating in mainstream services and activities (e.g. from minority groups, who are disabled, who are LGBTQI, or who are carers for others) can participate in a range of activities and experiences.
4. Children, young people and their families are listened to and their input is considered and included in decision making.
5. Young carers are supported and included; their needs and concerns are understood and are taken into account at local and strategic levels.
6. Children under 5 grow up in positive family environments and are supported to thrive.

Scheme 1B – Older People

## Priorities

1. Ageing well and reducing social isolation



1. In this priority we are looking in particular to:

- a) Encourage people over 50 to feel a greater connection to their community and they are able to continue making a positive contribution to their communities;
- b) Support Tower Hamlets becoming a recognised dementia-friendly community;
- c) Increase the number of older people with dementia who 'live well' ;
- d) Reduce the number of older people who feel lonely;
- e) Encourage more older people to access services that provide support in their local neighbourhoods;
- f) Increase engagement in meaningful relationships in care homes;
- g) Increased meaningful intergenerational contact.

2. Provision of physical and health-promotion activities for older people

In this priority we are looking in particular to support activities which help older people to be healthier and more active.

Outcomes

1. Reduced isolation and loneliness among older isolated adults, particularly those who are housebound, and those facing additional challenges (e.g. dementia, disability, limited English);
2. Older people are able to continue making a positive contribution to their communities;
3. Older people feel more included and integrated in their communities and are able to mix with people of different ages and from different backgrounds to increase the sharing of skills, experience and knowledge both amongst older people, and between different generations;
4. People living with dementia are supported to participate as much as, and as long as possible. Carers of people living with dementia are supported.

Scheme 1C – Access, information and self-management

Priority

1. Residents better informed/equipped to manage health conditions

In this priority we are looking in particular to;

- a) Improve personal management of conditions;
- b) Improve knowledge, skills and confidence to manage personal health and care;
- c) Improve physical functioning and ability to self-care;

d) Improve quality of life.

#### Outcomes

1. Residents of all ages are better informed/equipped to manage health conditions
2. Increased awareness of and access to local services, including crisis support
3. Residents and their families are aware of the benefits of healthy eating and eat more healthily

#### Scheme 1D - Healthy living and healthy choices

#### Priorities

1. Residents better informed to make healthier choices

In this priority we are looking in particular to:

- a) Increase engagement with community farms and community projects;
- b) Make a positive impact on health and wellbeing through sports, culture and leisure activity;
- c) Reduce social isolation through sports, culture and leisure activity

2. Increased engagement in physical activity

In this priority we are looking in particular to:

- a) Increase physical activity in the under-represented groups and improving health outcomes;
- b) Increase the proportion of children and young people that achieve the weekly minimum level of physical activity and develop an active lifestyle as a habit;
- c) Improve the sport and physical activity sector delivery interventions that meet the needs of local residents;
- d) Improve cohesion through participation in sport and physical activity;
- e) Improve mental health and reduce social isolation through participation in sport and physical activity;
- f) Improve the quality of the local physical activity and sport offer, offering opportunities for participation for the inactive and less active across a wide variety of disciplines.

#### Outcomes

1. Increased participation in a wide range of culture, play, physical activity, leisure and sport that are inclusive of age, gender, disability, race and mobility
2. More social opportunities for reducing isolation through participation in culture, play, physical activity, and sport.
3. Increased participation from marginalised groups

4. Creating opportunities for intergenerational relationships, shared experience through culture, play, physical activity, leisure and sport for all above

Scheme 1E – Improved inclusion, health and well-being outcomes for disabled people and people experiencing mental health issues

Priorities

1. Improved health outcomes for disabled people

In this priority we are looking to support activities which will help adults with complex needs have better health outcomes and activities which will improve the life expectancy for people with learning disability.

2. People experiencing mental health issues are better supported

In this priority we are looking in particular to:

- a) Increase the number of residents experiencing mental health difficulties being supported by a peer;
- b) Increase self-referrals to relevant support services, and
- c) Better inform residents where to access help in a crisis.

Outcomes

1. More mainstream services are culturally inclusive, welcoming and accessible for disabled people and people experiencing mental health issues from different ethnic backgrounds, different faith backgrounds, and who are LGBTQI
2. Adults with complex needs (i.e. who have multiple issues affecting their lives) have better health outcomes
3. Disabled people and people experiencing mental health issues;;
  - a) are more independent
  - b) are more aware of and more likely to participate in local services
  - c) have a better quality of life
4. People experiencing mental health issues have improved knowledge of where to access support, including peer support, social activities, and activities that build confidence and develop resilience

All of these outcomes refer to a broad cohort of potential beneficiaries. Projects that focus people with particular needs, disabilities or issues within the wider cohort are also eligible as long as they can demonstrate that they will help to deliver the outcomes.

## **Theme 2 Digital Inclusion and Awareness**

The VCS has a unique role in helping to achieve that vision through innovative community focussed services co-designed with local residents. The digital inclusion and awareness theme consists of three key schemes which each set out priority areas where VCS organisations are well placed to make a significant impact.

The three digital inclusion and awareness schemes are as follows:

- Scheme 2A: ICT Skills and Digital Careers
- Scheme 2B – Online Safety
- Scheme 2C – Improving health and wellbeing facilitated through digital platforms

Each theme and subsequent schemes were developed through a collaborative design process involving a number of stakeholder events which included engagement with staff, trustees, volunteers and service users of voluntary and community sector organisations, council and NHS colleagues as well as local residents.

Outcomes workshops for each theme were held which began with priorities agreed by Cabinet followed by participants suggesting more detailed sub-outcomes and ideas for potential activities. Throughout the workshop participants were encouraged to provide comments and ask questions about the themes, schemes and LCF process itself which informed the development of the programme. All of the workshops led to changes that helped to broaden and clarify the final LCF specifications.

The Digital Inclusion theme workshop resulted in several changes including acknowledging the concerns and needs of different populations in Tower Hamlets. Discussions started out with separate high level priorities covering access to ICT support and training for older people, children and young people's safety online, and digital skills development for children and young people, but the group questioned the way these headline outcomes were each focussed on particular age groups. Participants pointed out that young people learn about ICT, including coding, in school, whereas working age adults, particularly those with limited English and those who are disabled and/or older might not have had access to the same learning and are at risk of being digitally excluded. Similarly, the group agreed that online safety is not just a concern for children and young people, and may be part of the reason that older people are reticent to go online or participate in ICT training.

### ***Scheme 2A – ICT Skills and Digital Careers***

This schemes has two priorities, the first priority is access to ICT support and training for older people which is aiming to support older people to feel more informed and digitally included. The second priority is digital skill development for children and young people which looks to increase awareness of careers in the digital sector and provide children and young people with the opportunity to

develop the skills for the digital sector. There are 2 intended outcomes as outlined below:

1. Residents with limited digital/ICT skills, particularly older residents, disabled residents, those with English as a second language or other barrier to digital include:
  - a) Have increase confidence in using ICT, especially around security;
  - b) Are able to use digital method to access services, find information and communicate with others and do so more regularly;
  - c) Have increased digital skills.
2. Working age residents have greater awareness of digital careers, have increase digital skills, and have increased access to work and work placements in the digital sector.

Today in the UK, there are over eleven million people who lack the basic digital skills they need to participate fully in our digital economy. The Office of National Statistics suggests that there is no single reason for people being digitally excluded but the main reasons tends to include:

- A lack of interest in the internet and digital (59%)
- A belief they lack the skills to go online (21%)
- The cost of equipment (9%)

Organisations and small businesses are also not benefiting from digital access with 23% of small businesses and 58% of charities/community groups lacking the basic digital skills which will help them thrive.

This priority is supported at council level through outcome 1 of the Tower Hamlets Strategic Plan 2019-22 - People access a range of education, training and employment opportunities. This strategic plan area sets out what will be undertaken by the council to support residents capitalise on the education, training and employment opportunities available in our borough.

The population of Tower Hamlets is diverse and there are certain residents who face additional barriers in accessing digital/ICT skills. 4 in 10 residents were born outside the UK and the borough is ranked as the 16<sup>th</sup> most ethnically diverse local authority in England. This means that that English is a second language for a number of residents and due to this additional provisions are required to ensure access to services is available to this cohort. Secondly, Tower Hamlets has the highest rate of pensioner poverty in England with half of all residents aged 60 and over living below the poverty line which is more than three times the national rate (50 vs 16 per cent). This means that there are additional barriers for older residents to access digital/ICT skills. Finally, it is estimated that 4,848 people in Tower Hamlets have a learning disability and only 4.9% of adults with a learning disability were in paid employment in 2015-16, which is below the London average of 7.5% and the national average of 5.8%. Both the LBTH Adult Learning Disability Strategy 2017-2020 and LBTH Autism Strategy 2017-2020 include objectives which aim to increase participation of disabled residents in both community activities and workforce.

The second outcome for this priority focuses on raising the awareness of working age residents about the career opportunities that exist in the digital sector. This is an area of focus due to inequalities in the labour market that persist in Tower Hamlets which sees certain groups of residents continuing to face a higher risk of worklessness than others. Reflective of this, is the fact that Tower Hamlets has the 3<sup>rd</sup> highest economic output of any local authority area in the UK but has a lower employment rate than the Great Britain average (68 per cent vs 74 per cent).

In addition to council strategies supporting this priority the Mayor of London's plan for digital inclusion aims to raise basic digital skills in the following areas:

- Managing information: Use a search engine to look for information online; find a website previously visited and download / save a photo found online
- Communicating: Send a personal message via email or online messaging service; make comments and share information online
- Transacting: Buy items or services from a website; buy and install apps on a device
- Creating: Complete online applications forms which include personal details; create something new from existing online images, music or video
- Problem Solving: Verify sources of information found online; Solve a problem with a device/ digital service using online help

### ***Scheme 2B – Online Safety***

The schemes priority is children and young people online safety and in particular looking to support activity that raises awareness of potential dangers online among children, young people and their parents and carers and supports the implementation of suitable prevention measures. The scheme has three intended outcomes set out below:

1. Residents are aware of potential dangers online and implement suitable prevention measures
2. Children, young people and their families know how to report online bullying and abuse
3. Older people are aware of how to identify online scams and how to keep themselves safe

Supporting this priority is Outcome 2 of the Tower Hamlets Strategic Plan 2019-22 which sets out what will be undertaken by the council to support children and young people in the borough. Tower Hamlets has 75,455 residents' aged 0-19 years old. All children and young people have a right to feel safe and secure in every aspect of their life and this includes online platforms.

The LBTH Children and Families Strategy 2019-2024 sets the strategic direction for the borough which will deliver the best outcomes from children, young people and families who live here. To develop a clear set of priorities for this Strategy, the council undertook activities and used it to shape specific engagement with children, young people, parents, carers and local professionals. Messages received included 73 per cent of secondary school pupils know how to report online bullying but only 40 per cent would report it. 17 per cent of parents do not feel confident in monitoring social media/internet use.

Priority three of the strategy is titled safe and secure and aims to achieve the outcome of children and young people feeling safe where they live, work, play and study. During the development of this priority several focus groups were held where not one child mentioned online danger which had previously been raised as the utmost concern for teachers and parents. However we know from the most recent Pupil Attitude Survey that 30% of primary school children and 25% of secondary school children had experienced bullying therefore increasing awareness of the dangers of online bullying and abuse and equipping young people and their families with the tools to address this is important.

### ***Scheme 2C – Improving health and wellbeing facilitated through digital platforms***

The schemes priority is an increase in self-management/self-reliance/confidence/health literacy and looks to support activity that increases people's ability to manage their own health conditions, increases self-reliance and confidence and improve health literacy. The intended outcomes are set out below –

1. Residents, particularly those who feel digitally excluded, disabled people, and people with limited English:
  - a.) Have a better awareness of where to access health information/support, and increased confidence to access/navigate digital health services;
  - b.) Are more likely to self-manage health issues via digital platforms, including accessing health information, identifying appropriate support services, and connecting with others with similar issues;
  - c.) Have increased confidence and knowledge of 'trusted' digital sources of health information.

The Tower Hamlets Strategic Plan 2019-22 highlights this issue at outcome 3, people access joined-up services when they need them and feel healthier and more independent which sets out what activities the council will undertake to improve the health of residents. Further supporting this priority area is the LBTH Health and Wellbeing Strategy 2017-2020 and underneath this are a number of health strategies including the LBTH Mental Health Strategy 2017-20, Ageing Well Strategy 2017-20, Autism Strategy 2017-20, Learning Disability Strategy 2017-20 and Suicide Prevention Strategy 2018-21.

Health inequalities persist in Tower Hamlets and on average, a man living in the borough starts to develop health problems from the age of 54 compared to 64 in the rest of the country. For a woman, it is 56 compared to 64. The reasons for this are varied but include

the health impacts of higher levels of poverty (low income, unemployment, and insecure employment), poor housing quality, overcrowding, homelessness, social isolation, poor air quality, lack of access to affordable healthy food and lack of green spaces. We know people with a learning disability have poorer health and die younger with a lifespan that is 14 years less for males and 18 years less for females.

These factors result in a higher reliance by residents on services in the borough which could be alleviated through the use of digital platforms whereby information and support can be found as well as self-management of health issues undertaken.



### Theme 3 Advice and Information

In Tower Hamlets, it is estimated that 19 per cent of households live in poverty before housing costs are considered. Although this figure is just above the national average the picture changes entirely once incomes are considered net of housing costs. Using this measure, almost four in ten households are living below the national poverty line, after housing costs are considered. This is the highest rate of all local authorities in England and Wales, and is almost double the national average (39 vs. 21 per cent).

The 2015 Indices of Deprivation in Tower Hamlets concluded that: “Despite improvements in the borough’s relative position on the Index of Multiple Deprivation, it remains highly deprived on some of the measures that underpin the overall index, particularly those relating to: income deprivation (especially among children and older people), housing barriers and crime. The borough also remains highly deprived in relation to other London Boroughs.”

35,000 households in the borough are in receipt of Housing Benefit, the 5<sup>th</sup> highest in London, and over half of children in the borough live in households that receive Housing Benefit (CRU Research Briefing 2016).

The Strategic Plan has identified 2 of the key challenges as Poverty & Worklessness and Housing

Tower Hamlets is the 10th most deprived local authority in England, 4 in 10 households live below the poverty line, 15% of households have no adult in employment and around 1 in 5 residents earn below the London Living Wage

3 in 10 households rely on housing benefit to pay their rent, 18,726 on housing waiting list - 2nd highest in London and 35,110 additional homes are needed by 2029.

Poverty rates vary considerably by ethnic group. National estimates suggest that the Bangladeshi population has the highest rate of poverty across all groups, more than twice as high as the rate for the White population (50 vs. 19 per cent, UK). Other ethnic groups with high poverty rates include those from Pakistani, Black and Other BME groups (40-46 per cent). These national trends are also evident in Tower Hamlets with Bangladeshi residents being far more likely than other groups to live in low income households. In 2011, research for the Council found that 78 per cent of Bangladeshi residents lived in households receiving Council Tax Benefit, compared with 33 per cent of other (non-Bangladeshi) residents. Council Tax Benefit (now ‘Council Tax Reduction Scheme’) provides means-tested support to help low income households pay for Council Tax.

The Borough Profile explores employment patterns by ethnic group. This found that Bangladeshi residents in Tower Hamlets have the lowest employment rates of all ethnic groups, and once in work, tend to be over-represented in part-time and lower paid occupations.

The 2012 Welfare Act introduced the Government's first tranche of reforms which were designed to radically reduce the size of the welfare budget. For example, the Benefit Cap limited the total amount of benefits a household could receive and the Bedroom Tax reduced Housing Benefit payments for people deemed to have one or more 'spare' rooms in their home.

These reforms were targeted mainly at working age claimants and their families, and have impacted on both those in and out of work. The reforms led to considerable reductions in both tax credit and housing benefit support, as well as less generous up-rating of benefits to account for inflation. Research commissioned by the Council, from the Centre for Economic and Social Inclusion in 2014, estimated that these reforms affected around 40,600 Tower Hamlets households, or 45 per cent of all working age households in the borough. It was estimated that by 2015, those households were likely to have been, on average, £1,670 per year (£32 per week) worse off than would have been the case without the reforms.

There is also mounting evidence that welfare reforms are having an impact on food poverty and food bank use. Analysis in 2016, for the Trussell Trust evidenced a clear link between increased use of benefit sanctions and higher food bank use. The Trust has also found that roll out of Universal Credit, and associated delays in paying benefits, is leading to increasing numbers of referrals.<sup>23</sup> In 2016-17, the Trust handed out a total of 1,182,954 emergency food supplies to people in crisis across the UK – a record high.

In 2017 the Institute of Fiscal Studies estimated that these reforms, along with other changes, will increase poverty rates, particularly among claimant families with children. It is projecting that the national child poverty rate (relative poverty measure, after housing costs), will rise from 29 to 36 per cent during the period 2014/15 to 2021/22. In Tower Hamlets, families are larger, and more reliant on means-tested benefits, so are likely to be hit hard by these changes.

More than four in ten residents (43 per cent) were born outside the UK. Residents born in Bangladesh are the single biggest migrant group, but the most significant population growth in recent years was among EU nationals.

Net international migration accounted for three quarters of the borough's rapid population growth over the past decade and 17% of borough residents born outside the UK cannot speak English well or at all.

The 2011 Census found that 9 per cent of borough residents aged 16+ – a total of 18,311 adults – had low levels of English proficiency. This is the second highest proportion of residents with low levels of English proficiency in England, after Newham. It is also substantially higher than the average across London (4 per cent) and England (2 per cent).

Migrant residents make up 98 per cent of all those with low proficiency in English, just 2 per cent were UK-born. Figure 11 provides a breakdown of English proficiency by region and country of birth. It shows that overall, 17 per cent of Tower Hamlets residents who were born outside the UK cannot speak English well or at all. Residents born in Bangladesh had the lowest levels of proficiency, with

37 per cent saying they cannot speak English well or at all. More than one in five Somali-born residents (22 per cent) also has low levels of English proficiency.

There are also age and gender differentials in English proficiency: women comprise almost two thirds (64 per cent) of all those with low proficiency in the borough and older residents (65+) are more likely than young adults (16-24) residents to have low proficiency in spoken English (21 vs. 3 per cent).

In 2018 the Annual Residents Survey asked the question 'taking everything together, which of these phrases best describes how you and your household manage financially these days? In response, one third of residents said they were managing very well or quite well; around half said they 'get by alright' while 13 per cent (one in eight) indicated they were facing difficulties managing financially (ie, they don't manage very well, they had some financial difficulties or were in deep financial trouble).

Residents most likely to say they were having financial difficulties were: those from social grade DE (Semi/unskilled manual workers; and Pensioners/casual workers/long term unemployed); disabled people; Bangladeshi residents; those who are out of work; and those in social housing. Residents were also asked whether they had any specific financial concerns. The most common concern was worries about housing costs: almost one quarter of residents said they were concerned about paying the rent or mortgage.

The Local Community Fund (LCF) was co-designed with the voluntary and community sector (VCS). Part of the requirements for the delivery of the programme is for organisations to continue to improve the delivery of the service by co-designing the service with service users and other stakeholders.

The Council recognises the role that advice services play in mitigating and reducing levels of poverty by supporting vulnerable residents and low income households to access their rights, understand their obligation and maximise their incomes. The high levels of child poverty, pensioner poverty and in work poverty, combined with the impacts of welfare reforms, the roll out of Universal Credit, the housing crisis and continued economic austerity are some of the main drivers of demand for advice services in the borough.

In partnership with the CCG and other providers, the Council is undertaking a major strategic review of health, social care and welfare advice provision in the borough with a view to developing an integrated advice and information offer across the major providers in the public and voluntary sectors.

The advice and information services funded through the Local Community Fund will be integrated into this wider strategic approach during the period of the funding contract. However, as the new approach will not begin before April 2020, bids to this Theme of the Local Community Fund will initially address the outcomes set out below. Over the period of the funding contract successful providers will be expected to work with service users, local residents and partner agencies to co-design the future delivery integrated into the

wider strategic approach to advice and information provision. This will be part of the contractual arrangements.

The Advice and Information theme of the Local Community Fund has a single priority, Social Welfare Advice and Information. In this priority we are looking to fund VCS advice and information providers to provide a range of generalist and specialist social welfare and advice services across the borough to meet the outcomes set out below through the provision of integrated, coordinated, accessible services that meet the needs and demands of local people for legal advice on welfare benefits, housing, debt, employment rights, immigration issues and other social welfare issues.

Within this priority we are also seeking to support specific project work to provide training and capacity building services to improve service integration, volunteer training, promotion of best practice and coordination with public sector providers through forums and networking.

Partnership applications are encouraged in this scheme as we move to a more integrated advice service offer to local residents across all agencies in the public and voluntary sectors. Partnership approaches that maximise the use of resources and the integration of generalist and specialist advice provision through effective triage and referral are particularly welcome.

Partnership arrangements may also include cooperation and/or co-location with other community based services.

The added value of partnership arrangements in the advice and information sector will be acknowledged in the assessment process.

### Outcomes

In this theme the Council is seeking to achieve a range of outcomes to reduce poverty across the spectrum of social welfare advice and information activity:

1. Increased access to social welfare advice and income from benefits
2. Improved personal budgeting, financial stability and reduction in personal debt
3. Reduction in the number of people negatively impacted by welfare reforms and housing repossessions
4. Individuals are more informed about their legal rights
5. Individuals are more informed about their housing rights
6. Increased employment security
7. Increase access to immigration/asylum advice and casework
8. Increased engagement of older people with social welfare advice services

We are also looking to achieve outcomes for individuals which may be demonstrated by the numbers of residents where advice and information services have:

1. Increased income and other financial gains
2. Reduced indebtedness
3. Improved financial skills and confidence
4. Prevented homelessness
5. Resolved employment issues
6. Resolved immigration matters such as right to reside
7. Resulted in successful appeals

We expect projects to achieve a mix of higher level outcomes and outcomes for individuals.

In relation to capacity building and training within the sector, we would expect projects to work towards achieving the main outcomes of the programme and, in addition, may work towards

1. Improved coordination and cooperation between advice providers
2. Increased integration of service both within the VCS advice sector and with services in other sectors
3. Increased number of local volunteers achieving a recognised advice training accreditation
4. Improved liaison and co-ordination with public sector agencies
5. Improved access to information for providers

## Theme 4 Employment and Skills

The VCS has a unique role in helping to achieve that vision through innovative community focussed services co-designed with local residents. The employment and skills theme consists of three key schemes which each set out priority areas where VCS organisations are well placed to make a significant impact.

The purpose of this theme is to assist local residents capitalise on the dynamic employment growth occurring around them. There is an estimated 278,000 jobs in the borough and Tower Hamlets has the 3<sup>rd</sup> highest economic output of any local authority area in the UK, in 2015 the borough's economic output was around £29 billion – accounting for 2 per cent of the UK economy.

There are around 16,800 businesses based in Tower Hamlets and while the borough is home to some of the world's largest financial institutions, 98 per cent of local enterprises are small businesses which employ fewer than 50 people. Tower Hamlets want to work with employers and education providers to ensure that the education and skills training available supports the needs of the job market.

The employment rate in Tower Hamlets has risen considerably over the last decade from 56 per cent during 2005 up to 68 per cent in 2014-17 however inequalities within the labour market persist with certain groups continuing to face a higher risk of worklessness than other.

The three employment and skills schemes aim to address some of these inequalities and are set out below:

- Scheme 4A - Developing and embedding good practice in the work place for people with disabilities, learning difficulties and physical and mental health barriers to work
- Scheme 4B – Reducing barriers to employment for disadvantaged groups
- Scheme 4C – Support focused on increasing access to art and cultural industries

### ***Scheme 4A - Developing and embedding good practice in the work place for people with disabilities, learning difficulties and physical and mental health barriers to work***

The schemes priority is to promote ethical employer practices to focus on improving employment and progression opportunities for disadvantaged people, with an emphasis for employers on improving business productivity. In particular, the priority aims to undertake the following –

1. Improve employee retention
2. Increase employee progression
3. Improve employee-employer relations

4. Ensure employers are better informed of how to support their employees
5. Employees feel more comfortable and better supported in the work place
6. Increase take-up of relevant support services
7. Develop packages of support measures for businesses and employees
8. Enhance productivity

The scheme has four outcomes as outlined below:

1. More disabled people and people with mental health issues access work experience placements and employment opportunities
2. Disabled employees feel more comfortable and better supported in sustainable roles in the workplace
3. Disabled people have access to meaningful, relevant training and skills development
4. Tower Hamlets employers are more inclusive and employ more disabled people and people with mental health issues, and are more aware of how to support them.

Outcome 1 of the Tower Hamlets Strategic Plan 2019-22 addresses this priority and sets out the actions the council will take to ensure people access a range of education, training and employment opportunities. Residents with mental health or learning disabilities are a particular priority due to additional barriers this group of residents face in accessing the labour market.

In 2014-16 less than half of all working age disabled people were in work compared with three quarters of the non-disabled population (48 vs 74 per cent). Disabled people were also more likely to work part-time: in 2011, 39 per cent of disabled workers were employed part-time compared with 24 per cent of non-disabled workers.

In addition to the Strategic Plan there are several other key strategies which support this priority area. The Learning Disability Strategy 2017-2020 includes specific aim to increase the number of residents with a learning disability who work or volunteer. 4.9% of adults with learning disability were in paid employment in 2015-16 which is below the London average of 7.5 per cent and national average of 5.8 per cent.

The Tower Hamlets Health and Wellbeing Strategy 2017-2020 also includes a specific priority around employment and health and sets out what will be done to reduce unemployment amongst those who suffer from mental health issues and disabilities.

In addition to these strategies this scheme will work to further address the inequalities that persist in the labour market for people with disabilities including learning difficulties and physical and mental health barriers by providing support to employers and employees alike.

#### ***Scheme 4B – Reducing barriers to employment for disadvantaged groups***

This scheme's priority is to reduce barriers to employment for disadvantaged groups and in particular looking to increase employment and training opportunities for a range of groups who may be considered further from the labour market, including young people and women who have been away from work and may want to start their own business, and employment and volunteering opportunities for older people. In particular the scheme has a particular focus on the following areas:

- a) Increase in the proportion of older people who feel they are able to continue making a positive contribution in our communities through volunteering;
- b) Older people develop employability skills;
- c) Older people have more confidence to look for opportunities

Employment skills for vulnerable young people and those who are NEET

- a) Increase the number of vulnerable young people engaging and accessing provision;
- b) Reduce in the percentage of young people who are NEET

Employment and skills for young people at risk of achieving poor outcomes

- a) Increase educational attainment - post 16;
- b) Increase in attainment for young people at risk of not reaching their full potential – e.g. white working class.

This priority is addressed through outcomes 1 of the Tower Hamlets Strategic Plan 2019-2 which sets out what action will be undertaken for people to access a range of education, training and employment opportunities.

While unemployment has decreased certain inequalities persist. The employment rate for older workers in Tower Hamlets is relatively low. 58 per cent of borough residents aged 50-64 were in work compared with 69 per cent across London. Residents with no qualifications also face a higher risk of worklessness and during 2014-16 just one third of residents with no qualification were in work compared with 87 per cent of those who held higher level qualifications.

This strategy also aims to reduce the number of young people who are not in employment, education or training (NEET). At the end of 2016, 6 per cent of 16-17 year olds in Tower Hamlets were considered NEET which is in line with the national average of 6 per cent but slightly higher than the London average of 5 per cent.

Improving educational attainment is also a priority as set out in the Learning & Achievement Strategy for 14 – 25 year olds. While educational attainment in the borough is good, with average attainment 8 scores at Key Stage 4 constantly above the national average, certain groups lag behind with attainment 8 score for all pupils in Tower Hamlets being 47 compared to White British Boys on free school meals who score an average of 28 and Black Caribbean boys scoring an average of 36.

#### ***Scheme 4C – Support focused on increasing access to art and cultural industries***

The schemes priority is support focused on increasing access to art and cultural industries. In this priority we are looking in particular to increase numbers participating in arts activities and schemes that lead to training and employment in the creative sectors.

The scheme has three outcomes as outlined below:



1. Increased opportunities in the arts and cultural industries for BME people, women, disabled people, working class people, older people;
2. Increased access to industry relevant training;
3. Increase in people participating in arts projects for the first time

This priority is addressed through outcomes 1 of the Tower Hamlets Strategic Plan 2019-2 which sets out what action will be undertaken for people to access a range of education, training and employment opportunities.

Inequalities in the labour market persist in Tower Hamlets with some residents facing higher barriers to employment than others. During 2014-16, less than half of the borough's BME women were in work (48 per cent). Rates were lowest for Bangladeshi and Somali women: just one quarter of these women were in employment at the time of the 2011 Census. In 2014-16 less than half of all working age disabled people were in work compared with three quarter of the non-disabled population (48 vs 74 per cent). Disabled people were also more likely to work part-time: in 2011, 39 per cent of disabled workers were employed part-time compared with 24 per cent of non-disabled workers. The employment rate for older workers in Tower Hamlets is relatively low: 58 per cent of borough residents aged 50-64 were in work compared with 69 per cent across London

Tower Hamlets is a diverse borough in terms of our population but also has a rich history and cultural assets. It is also home to 120 parks and open spaces, 22 art galleries and 6 museums, 1,000 galleries and 3 city farms. It is also one of the most popular filming boroughs in London with multiple filmings taking place in the borough yearly.

The Tower Hamlets Growth and Economic Development Plan 2018-2023 further supports this scheme and sets out how the council aims to build an economy that works for local people and ensure everyone can benefit from the boroughs success. It includes the following three priorities:

- Priority 1: Preparing our young people for success
- Priority 2: Helping our working age residents thrive
- Priority 3: Creating the conditions for business growth

Employment and training initiatives already exist for residents in Tower Hamlets through the WorkPath Programme. The Tower Project's Job Enterprise and Training Service specialises in supporting employment services for young people and adults with a learning disability or autism. Arts jobs and professional development opportunities are advertised on the council website by the council's arts and events team. The scheme will work to increase awareness of the opportunities that exist in this sector for BME people, women, disabled people, working class and older people.

## Community Safety Theme

The VCS has a unique role in helping to achieve that vision through innovative community focussed services co-designed with local residents. The community safety theme consists of three key schemes which each set out priority areas where VCS organisations are well placed to make a significant impact.

The three community safety schemes are as follows:

- Scheme 5A: Reduction in the exploitation of children, young people and other vulnerable groups
- Scheme 5B – Improving the perception of young people in the community
- Scheme 5C – Service for people affected by domestic violence or other unsafe circumstances.

Each theme and subsequent schemes were developed through a collaborative design process involving a number of stakeholder events which included engagement with staff, trustees, volunteers and service users of voluntary and community sector organisations, council and NHS colleagues as well as local residents.

Outcomes workshops for each theme were held which began with priorities agreed by Cabinet followed by participants suggesting more detailed sub-outcomes and ideas for potential activities. Throughout the workshop participants were encouraged to provide comments and ask questions about the themes, schemes and LCF process itself which informed the development of the programme. All of the workshops led to changes that helped to broaden and clarify the final LCF specifications

### ***Scheme 5A – Reduction in the exploitation of children, young people and other vulnerable groups***

This schemes priority is to reduce the exploitation of children and young people, and vulnerable groups and in particular look to increase the extent to which yo feel safe and reduce in the number of children and young people, and vulnerable groups being exploited. There are four intended outcomes as outlined below

Children, young people and other vulnerable people:

- a) Have increased confidence and critical thinking skills
- b) Have an increased understanding of what a safe relationship is, what exploitation is, and how to spot the signs of abuse and exploitation
- c) Have an emotional and actual vocabulary to articulate what is happening to them
- d) Are better able to challenge and support each other around relationships

Supporting this priority is outcome 2 of the Tower Hamlets Strategic Plan 2019-22 which states *children and young people are protected so they get the best s and can realise their potential*. This strategic plan area sets out what will be undertaken by the council to support children and young people in the borough.

One of the strategic plan areas of focus has been to ensure adequate early help for the most vulnerable children and families, with a strong focus on safeguarding Local Authorities have an overarching responsibility for. The need for this priority area is further heightened by a number of factors including the borough having youngest population in the UK with almost half of residents being aged 20-39, combined with the child poverty rate in Tower Hamlets is more than double the r

England (20 per cent) and above the London average (24 per cent). The deprivation affecting children index (DACI) also shows that Tower Hamlets has the highest proportion of children living in income deprived families.

In 2015/16 the rate of children subject to a child protection plan per 10,000 populations in Tower Hamlets was high (50.1 percent). Children aged 0-5 and boys had the highest number of Child Protection Plans (106 and 173 in March 2015 respectively). White children and young people are underrepresented and “Mixed heritage” (particularly mixed White and Caribbean and mixed White and Other backgrounds) children and young people are over-represented.

The percentage of child protection plans lasting two or more years has increased in 2014-15. A sample of cases has revealed particular issues with longstanding physical and sexual abuse and return of violent offenders who return to the home, where it was appropriate to maintain plans for a long period. However in some cases where issues with parental capacity to protect were present, issues were not resolved early enough.

Neglect and emotional abuse remain the most frequent reasons for children having a child protection plan in Tower Hamlets; with 30 per cent of children with a child protection plan was for the primary reason of neglect.

In addition to the strategic plan The Tower Hamlets Community Safety Partnership Plan 2017-2021 aims to reduce the number of crimes and anti-social behaviour in the borough, but in some categories, it aims to increase the number of residents who feel confident enough to report it to the council.

There are four key priorities in the plan which include anti-social behaviour (ASB), Violence, hate crime/community cohesion/extremism and reducing re-offending. In addition, The Children and Families Plan 2016-19 has a priority called ‘free from harm’, which also highlights the need to protect children and families from harm and exploitation.

### ***Scheme 5B – Improving the perception of young people in the community***

The scheme's priority is to improve the perception of young people in the community and in particular providing children and young people with opportunities to build good relationships with others in the community to help break down barriers and develop good, positive relationships between people of different generations.

There are three intended outcomes for this scheme as outlined below:

1. Children and young people are, and are seen to be, a positive part of the community
2. Increased community cohesion and sense of belonging
3. Residents, especially older people, feel less wary of children and young people

Supporting this priority are Outcomes 2, 7 and 8 of the Tower Hamlets Strategic Plan 2019-22. Outcome 2 sets out what will be undertaken by the council to support children and young people in the borough. The need for this priority arises from various factors including the makeup of the borough. Tower Hamlets is a young borough with an estimated 74,700 children and young people aged 0 – 19 living in the borough. Tower Hamlets is one of the most diverse communities in the UK with a wide range of languages spoken in schools alone. However issues such as anti-social behaviour and hate crime continue with outcomes 7 and 8 aiming to ensure people feel safe in their neighbourhoods and anti-social behaviour is tackled and aiming to ensure people feel they are part of a cohesive and vibrant community respectively.

Further supporting this priority is the Tower Hamlets’ Antisocial Behaviour (ASB) Blueprint which states that reporting ASB is a subjective and not completely re

process due to personal tolerance and perceptions as to what constitutes acceptable behaviour. Young people are often viewed as perpetrators of anti-social behaviour which can create longstanding negative perceptions and exacerbate community tensions. However highlighting further need for focus in this area is the fact that entering the criminal justice system for the first time is higher in Tower Hamlets compared to London with 158 new entrants in 2016 alone.

Further to this, The Children and Families Plan 2016-2019 highlights the strategic aims and priorities for all agencies working with children and young people across the borough. One of its visions is 'for children and families in Tower Hamlets to have the best possible health, a good standard of living and to grow up in an environment that respects their right to play and relax.'

In 2018, 92 per cent of residents surveyed agreed that people of different backgrounds get on well together in Tower Hamlets and the promotion of community cohesion between different parts of the community and provision of early support by the council and partner organisations is a key component of this.

### ***Scheme 5C - Services for people affected by domestic violence or other unsafe circumstances***

The priority of this scheme is for services for people affected by domestic violence and in particular aims to increase the extent to which young people affected by domestic violence and sexual abuse (DVSA) feel safe and increase the extent to which families affected by domestic violence feel safe.

There are two intended outcomes as outlined below:

1. More residents, particularly families and young people, are aware of the different forms that domestic violence and sexual abuse (DVSA) can take; know how to recognise it, and where to access support.
2. Young victims and witnesses of DVSA are supported to recognise and report it. Tower Hamlets Violence against Women and Girls Strategy 2016-19 (now 2019-24) states that abuse can take place regardless of gender, ethnicity, faith, sexuality or age.

The Tower Hamlets Strategic Plan 2019-22 highlights these issues in outcomes 7 and 8 which aim to ensure people feel safer in their neighbourhoods and anti-social behaviour is tackled as well as seeking to ensure people feel they are part of a cohesive and vibrant community. Violence against women and girls is also a key priority for the council and a pledge included in the Mayors Manifesto in 2017. Domestic violence accounts for the highest proportion (3,051 incidences) of violent crime in the borough, followed by violence with injury (2,835 incidences). Domestic violence in Tower Hamlets disproportionately affects women who are 97 per cent of victims however it is recognised that it also affects men and boys too.

The key strategy supporting this priority is The Tower Hamlets Violence against Women and Girls Strategy 2019-24 which sets out what the direction the council is taking in addressing all gender-specific abuse. The strategy directly informs the VAWG action plan which has three priorities which include support and protection for victims, bringing offenders to justice and education communities and challenging gender based discrimination (misogyny).

### Section 3 – Assessing the Impacts on the 9 Groups

Analysis by theme of the Local Community Fund set out below relating to equalities protected characteristic (EPC) includes reference to:

- a. Potential loss expressed as the provision for each LCF theme currently delivered through MSG. The structure of MSG with services linked to ‘Strands’ within each theme does not directly relate to the new Schemes which form the structure of the LCF. While a best fit has been attempted, there may be some areas still do not compare exactly
- b. Significant challenges which the LCF may help to address, and
- c. New activities (or the continuation of established activity) which it is anticipated would be provided by the recommended LCF bids in each Theme.

The analysis also includes borough maps showing the geographic distribution of the services proposed in the recommended LCF bids. These indicate which wards each service will benefit, including borough wide services. For Theme 3, Advice and Information, the recommended LCF bid is a single consortium bid covering the whole borough. The map for this Theme therefore indicates this.

Target Groups	Impact – Positive or Adverse The impact the proposal will have on specific groups of service users or staff.	Reason(s)	
Race	Adverse	Theme 1- Inclusion, health and wellbeing	Within Theme 1, none of the schemes specifically focus on race. Instead, all projects are required to demonstrate how they are culturally inclusive and welcoming for people of different ethnic backgrounds. All providers will also be required to demonstrate due regard in service delivery and mitigate adverse impact on any particular group. Community cohesion is also a cross-cutting theme of the LCF programme and therefore all providers will be required to demonstrate how they are

			<p>promoting cohesion.</p> <p>A number of projects actively emphasise engaging with people from a diverse range of ethnicities as an element of their project</p> <ul style="list-style-type: none"> <li>• St Hilda’s Girls Driven project will work with girls from diverse ethnic backgrounds</li> <li>• Age UK Caxton Hall activities project say older volunteer will receive equalities and diversity training. The project includes a community cohesion strand that will provide opportunity for older people to work alongside people of different backgrounds.</li> <li>• The REAL project aims to make more mainstream services culturally inclusive, welcoming and accessible for disabled people and people experiencing mental health issues from different ethnic backgrounds</li> </ul> <p>A number of projects within this theme have a particular focus on BME residents</p> <ul style="list-style-type: none"> <li>• Stifford Young Girl’s project seeks to empower girls from hard-to-reach BME backgrounds</li> <li>• Yard Theatre Tower Hamlets Teens project says it will be open to everyone irrespective of race and at least 50% of participants will identify as BME</li> <li>• The Vietnamese and Chinese Lunch and Social Club will be primarily focussed on people from the Vietnamese and Chinese community</li> <li>• London Tigers Exercise for health Project is specifically aimed at BME women, children and young people, particularly Bangladeshi, Somali and Arab speaking communities. There are specific targets in relation to the BME Community.</li> <li>• The Mudchute Association has specific targets for the numbers of Bangladeshi children engaging with the project.</li> <li>• The consortium led by Stifford Centre includes a number of organisations who focus on particular ethnic groups including Black Women’s Health and Family Support, Bangladesh Youth Movement and Wapping Bangladeshi Association.</li> <li>• The Bangladesh Youth Movement is also funded separately for a standalone</li> </ul>
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			<p>project within theme 1 which is focused in BME women, particularly Bangladeshi women.</p> <p>The analysis in relation to race therefore looks positive, however there may be gaps in some areas.</p> <p>A number of previous areas of MSG reveal a high level of participation from BME communities. In the MSG Sports projects for example, we have the following data representing 528 beneficiaries: of the 84% that responded: Bangladeshi 64%, Somali 7%, White British 5%, Black British African 4%</p> <p>The following is the data from the MSG Vulnerable &amp; Excluded projects (230): Bangladeshi 63%, Black British African 7%, White British 6%, White European 4%, Mixed Other Ethnicity 4%, Somali 3%, Pakistani 3%</p> <p>This data is from the MSG Youth projects (635) – of the 85% of beneficiaries that responded to this category: Bangladeshi 70%, White British 9%, Somali 6%</p> <p>MSG Lifelong Learning &amp; Sport projects had the following data (927) – of the 68% of beneficiaries that responded to this category: Bangladeshi 32%, White British 19%, Prefer not to say 15%, White European 7%, Somali 6%</p> <p>MSG Lunch Clubs give the following data (2,189) – of the 36% who responded: Bangladeshi 27%, White British 25%, Chinese 12%, Somali 12%, Black Caribbean 5%, Vietnamese 5%</p> <p>And for MSG Prevention Health &amp; Wellbeing (908) – of the 79% that responded: White British 43%, Bangladeshi 25%, White Other 5%, Black Caribbean 5%, White Irish 3%, Indian 3%</p> <p>These figures indicate strong participation from BME groups, particularly Bangladeshi and Somali communities in the current MSG Programme. The numbers of people affected, for example in relation to the 2,189 lunch club beneficiaries is</p>
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		<p>also significant. Given that 86% of Tower Hamlets residents feel people from different backgrounds get on well together (ARS 2018), it would be reasonable to expect a comprehensive borough wide service, to be able to effectively serve people of all races. However, it is acknowledged that access, participation and involvement in borough wide, more universal services can present a challenge for some BME communities, particularly smaller and more newly established communities such as the Somali or Chinese communities. There is therefore a need for the Council to make provision for specific communities to have a role in encouraging and facilitating access to mainstream services.</p> <p>Language learning and proficiency is a further issue where there is potential for adverse impact on those of particular ethnicities, particularly those for whom English is not their first or only language. There is a body of research<sup>1</sup> which suggests that mother tongue classes have a positive impact on language proficiency and literacy more widely. Whilst support for community languages is not something which is a specific focus for the new LCF theme, there are projects that recognise the barriers that language can create to accessing service. The Globe Community Project, for example, is targeted at a number of hard to reach groups including those with lower language and literacy levels. A broader consideration of the appropriate approach to community languages in the borough would clarify what the needs are in this regard and the best approach to addressing them.</p> <p>There are substantial differences in the new LCF theme compared to MSG theme and therefore a number of existing projects will not be funded as they were not a priority in the new theme. This means there may be gap in provision for those that were previously supported through the MSG programme.</p> <p>From our analysis the proposed change could potentially have an adverse impact on particular ethnic groups such as Somali, Bengali and Chinese communities. Through contract mobilisation, we will ensure that providers will address gaps and that they are inclusive, with access and participation reflecting the demographic composition</p>
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<sup>1</sup> E.g. Benson, 2004; Benson & Kosonen, 2013; Yiakoumetti, 2012; The Journal of Applied Economics, Volume 51, 2019, v6, The impact of learning first in mother tongue



			of the borough. Furthermore, through the transition support for the LCF programme we will support existing providers to refer clients to other providers and also provide capacity building support to them.
	Positive	Theme 2- Digital Inclusion	<p>Although Digital Inclusion was a cross-cutting theme in the MSG 2015-18 programme there was not a specific Theme / Strand. Tower Hamlets is the 16<sup>th</sup> most ethnically diverse local authority in England and two third of residents belong to minority ethnic groups. More than four in ten residents (43 per cent) were born outside the UK which means that English is a second language for a large number of residents which may create additional barriers around access to digital platforms and ICT skills.</p> <p>The Tower Hamlets Annual Residents Survey 2018 found that 92 per cent of respondents said they had access to the internet. While levels of internet access were the same for both White and Bangladeshi residents, patterns of use were quite different. Typically White residents were far more likely than Bangladeshi (and other BME) residents to use the internet for most activities. An example of this is 72 per cent of White residents with internet access used internet banking compared with 45 per cent of Bangladeshi residents and 59 per cent of those from other BME groups. In addition White residents were found to be almost three times as likely to have used email to make contact with the council as Bangladeshi residents (25 v 9 per cent). These findings underline the distinction between having access to the internet and the degree to which residents feel able or willing to use it for different purposes.</p> <p>The Digital First Project by the Wapping Bangladesh Association is one example of where this disparity can be addressed within the LCF programme. This project will work to engage socially isolated BME older adults 55+ who are not computer literate and digitally excluded. The project will deliver ICT and internet training that will help older BME adults to cope with facing key life transitions or challenges.</p> <p>In addition, all recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers in accessing digital platforms, information about online safety and ICT skills and digital careers in Tower Hamlets as outlined above and will continue to be monitored as part of the ongoing</p>

			assessment of LCF projects during the lifetime of the funding.
	Positive	Theme 3- Advice and information	<p>Tower Hamlets is the 10 most deprived local authority in England, in terms of its average deprivation score. Poverty rates vary considerably by ethnic group. National estimates suggest that the Bangladeshi population has the highest rate of poverty across all groups, more than twice as high as the rate for the White population (50 vs. 19 per cent, UK). Other ethnic groups with high poverty rates include those from Pakistani, Black and Other BME groups (40-46 per cent). These national trends are also evident in Tower Hamlets with Bangladeshi residents being far more likely than other groups to live in low income households. In 2011, research for the Council found that 78 per cent of Bangladeshi residents lived in households receiving Council Tax Benefit, compared with 33 per cent of other (non-Bangladeshi) residents. Council Tax Benefit (now 'Council Tax Reduction Scheme') provides means-tested support to help low income households pay for Council Tax.</p> <p>The MSG Programme included Social Welfare Advice Services (5,860): The service users for this project were as follows Bangladesh 51%, White British 11%, African 7%, White Other 6%, Somali 5%. This is reflective of the levels of poverty and needs for this service amongst local residents.</p> <p>The recommended LCF projects will provide a comprehensive borough wide service which will include advice to improve personal budgeting, financial stability and reduction of personal debt for residents including the Bangladeshi and other minority communities in the borough. The impact of this on this protected characteristic will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding. There are two recommended projects under the advice and information theme which will provide free, confidential, independent and quality assured advice services to Tower Hamlets residents to resolve any problems they may face around a range of topic including welfare benefits, housing and money/debt etc. These are:</p> <ul style="list-style-type: none"> <li>• East End Citizens advice Bureaux – Advice Tower Hamlets</li> <li>• Island Advice Centre – Tower Hamlets Advice Training and Capacity Building Project</li> </ul>

	Neutral	Theme 4- Employment and skills	<p>BME residents, particularly women face inequalities within the labour market in Tower Hamlets. During 2014-16, less than half of the borough’s BME women were in work (48 per cent). Rates were lowest for Bangladeshi and Somali women – just one quarter of these women were in employment at the time of the 2011 census. BME workers were far more likely than White workers to work part-time: in 2011, almost four in ten BME workers were employed part-time compared with just 15 per cent of White workers. Once in work, White workers were far more likely than BME workers to be employed in professional and managerial jobs (65 vs. 45 per cent of workers). Bangladeshi workers were the least likely to be employed in professional and managerial jobs (25 per cent), while Indian workers were the most likely (80 per cent).</p> <p>In addition, 4 in 10 residents (43 per cent) of Tower Hamlets were born outside the UK which means there are large groups of people with poor proficiency in English who face additional barriers to employment. In 2011, resident whose first language was English were almost three times as likely to be in work compared with those with poor proficiency in English (71 per cent vs 25 per cent). Older Bangladeshi and Somali women were most likely to have poor English proficiency.</p> <p>The MSG Programme included the MSG Routeways to Employment Project whose beneficiaries were from a range of backgrounds and ethnicities as set out below. The 92% of beneficiaries that responded were: Bangladeshi 50%, White British 12%, African 5%, Somali 5%, Prefer not to say 5%, White Other 4%. The uptake of this project is reflective of the trends that exist around inequality in the labour market. All other groups had some representation apart from: Traveller Irish Heritage, Turkish/Turkish Cypriot, Greek/Greek Cypriot, White Gypsy.</p> <p>The recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers to employment Tower Hamlets as outlined above and will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding. This is line with the need identified in this theme and the service users of the MSG Programmes. Within the Employment and Skills theme there are four projects specifically targeting disadvantaged groups including those from ethnic minorities who face additional barriers to employment in Tower Hamlets. These are:</p>
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			<ul style="list-style-type: none"> <li>• Society Links Tower Hamlets – Job Club</li> <li>• Stifford Centre Limited – BME Women’s Employment Support Programme</li> <li>• Four Corners Limited – ZOOM Film School</li> <li>• The Bromley by Bow Centre – Creative Communities</li> </ul> <p>BME women along with carers and single parents of Bengali, Somali and BME heritage with limited English language ability will be targeted to participate in a training programme to help those who have been unemployed and economically inactive, isolated and disenfranchised in order to improve their job prospects. In addition, another of the recommended projects will work with BME communities to nurture creative talent and enable them to acquire the practical skills, experience and industry knowledge needed to move into work in the creative industries.</p> <p>A number of projects will focus on other underrepresented group such as local white British residents.</p>
	Positive	Theme 5 – Community safety	<p>Community Safety was not a Theme in the MSG 2015-18 programme.</p> <p>Tower Hamlets is ranked as the 16<sup>th</sup> most ethnically diverse local authority in England in terms of the mix of different ethnic group populations. More than two thirds of our residents belong to minority ethnic groups and the borough is home to the largest Bangladeshi population in the country who comprise 1 in 3 residents. The second largest ethnic group, making up 31 p cent of the population is White British.</p> <p>The Mayor’s Office for Policing And Crime (MOPAC) reported that there were 577 instances of racist hate crime offences in Tower Hamlets between June 2018 and June 2019. MOPAC data reports that 41 per cent of victims of domestic abuse in Tower Hamlets are Asian, 35 per cent are white and 10 per cent Black.</p> <p>The boroughs ethnic diversity and regular instances of racist hate crime and domestic abuse support the decision to create a new community safety theme in the LCF programme.</p>

			<p>The recommended LCF projects will work to further reduce the exploitation of vulnerable groups through the provision of borough wide services. There are various projects which aim to reduce the exploitation of children, young people and other vulnerable groups including those from minority ethnic groups. These are:</p> <ul style="list-style-type: none"> <li>• Kazzum Arts – Build</li> <li>• Osmani Trust - Schools and Community Resilience Programme</li> <li>• Streets of Growth - Resilient Young Leaders Programme</li> <li>• Four Corners Ltd – Into Focus photography project</li> <li>• Leaders in Community – Project Connect</li> <li>• Hestia Housing and Support – Families Safe and Secure in Tower Hamlets</li> </ul> <p>Included in these projects will be specific support for young people and mothers of South Asian descent from throughout the borough living in refuges.</p>
Disability	Adverse	Theme 1- Inclusion, Health & Wellbeing	<p>Scheme 1E is specifically targeted to improved inclusion, health and well-being outcomes for disabled people and people experiencing mental health issues. Projects across the theme have an inclusive offer for all service users, including those with disabilities. The majority of projects included within the Youth provision provide inclusive support including targeted provision for disabled users.</p> <p>18 out of 29 projects in this theme have specifically addressed this protected characteristic in their bids, most of them with projects that are specifically targeted at disabled people.</p> <ul style="list-style-type: none"> <li>• Half Moon Young People’s Theatre project. (Theatre shows and drama for young people) includes people with disabilities up to the age of 25. 7 for the 8 drama groups are fully inclusive. Disabilities needs are met with appropriate specialist access support (e.g. for neurodiverse young people and any young people with physical and/or cognitive disabilities, sensory impairments and mental health conditions). The final group is for young people aged 13-25 with complex and multiple disabilities or who operate within the autistic spectrum, whose needs are best met in a smaller specialist setting. Referrals from organisations such as the National Autistic Society are accepted.</li> <li>• Newark Youth Girl’s in Action project includes people with disabilities up to</li> </ul>

			<p>the age of 25</p> <ul style="list-style-type: none"> <li>• St Hilda’s Girls Driven project will work with girls and young women from diverse backgrounds including disability</li> <li>• Stifford Youth Girl’s project includes people with disabilities up to the age of 25</li> <li>• Yard Theatre Tower Hamlets Teens project says it will be open to everyone irrespective of disability and at least 10% of participants will be disabled or living with a chronic illness</li> <li>• Age UK Friend at Home project will match disabled housebound older people with volunteers</li> <li>• ELOP TH LGBT Support project will offer a weekly support and peer befriending group for disabled LGBT people included those with experience of mental health concerns</li> <li>• Stifford Centre Older People’s Lunch Club will offer health sessions such as Dementia Friend Club</li> <li>• Tower Hamlets Friends and Neighbours Older People’s Befriending project will provide advocacy services to older people the borough, befriender advocate are all trained Dementia Champions</li> <li>• The Globe Community Project delivers for people with chronic pain and illness, addressing social isolation</li> <li>• The Mudchute Association has specific targets for the numbers of disabled children engaging with the project.</li> <li>• Newark Youth’s project has specific sessions for disabled people</li> <li>• The consortium led by Stifford Centre includes a number of sessions specifically for people with disabilities.</li> <li>• The Deafplus project focuses on disability in the form of those who are deaf or hard of hearing and also has a mental health focus.</li> <li>• The Forget Me Not project focuses on people with memory problems including links to Alzheimers and their carers, giving them a variety of social experiences to produce improved health outcomes.</li> <li>• The ICM Foundation project focuses on those with learning disabilities and also works with other disability groups.</li> <li>• The St Hildas East project focuses on young people with disabilities and</li> </ul>
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			<p>learning disabilities.</p> <ul style="list-style-type: none"> <li>• The Working Well Trust project focuses on people with mental health issues.</li> </ul> <p>Whilst a wide range of physical disabilities, learning disabilities, mental health issues and long term conditions are addressed by these projects, there appears to be a gap in terms of provision of mental health services for young people. It is hard to know how many young people who were beneficiaries of MSG had mental health problems as they have a high rate of not responding at all or selecting “prefer not to say” rather than declaring a mental health problem. For example, in the MSG Youth theme we see the following data (635) – of the 20% of beneficiaries that responded to this category: Prefer not to say 65%, Other Disability 19%, Learning 9%, Mental Health 2%, Physical 2%, Blind/Partially Sighted 2%, Deaf/Partially Deaf 1%</p> <p>In other themes such as the MSG prevention, health and wellbeing theme, declaring a Mental Health problem was much more common, with 60% responding and 25% indicating mental health. Evidence shows that it is possible to impact upon young people’s mental health by building their resilience to mental health problems, making this a missed opportunity to address this at an early age.</p> <p>From our analysis the proposed change could potentially have an adverse impact on particular disabled groups. Through contract mobilisation we will identify how proposed bidders will ensure those gaps are addressed. Furthermore, through the transition support for the LCF programme we will support existing providers to refer clients to other providers and also provide capacity building support to them.</p>
	Positive	Theme 2- Digital Inclusion	<p>Although Digital Inclusion was a cross-cutting theme in the MSG 2015-18 programme there was not a specific Theme / Strand.</p> <p>The Tower Hamlets Annual Residents Survey 2018 found that while 92 per cent of residents surveyed said they had access to the internet those with a disability or health problem were far less likely to have internet access compared with those without a disability or health problem (67 vs 95 per cent).</p> <p>The recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers in accessing digital platforms, information about online safety and ICT skills and digital careers in Tower Hamlets as outlined</p>

			above and will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding.
	Positive	Theme 3- Advice and information	<p>The Housing Needs Survey carried out as part of the wider Strategic Housing Market Needs Assessment in 2014 estimated that there are approximately 20,293 households in the borough that contain at least one household member with a disability or limiting long term illness, and that 1.7 per cent of households said that they have a support need.</p> <p>Results from the survey also provided an indication of the extent to which homes have been adapted to meet the needs of disabled residents. Around 10.5 per cent of households said that their home had been adapted to meet the needs of a household member who is disabled. More advice services is likely to have a positive impact on people with disabilities.</p> <p>Adult's social care services support people who are disabled, ill, frail, elderly or vulnerable. Included in the wide range of support provided is the provision of information and advice. Tower Hamlets received 3,962 (1651 aged 18 – 64 and 2311 aged 65+) requests for support from new adult social care clients in 2018/19. Furthermore, 4,719 people received adult social care support (short-term and long-term) in 2018/19.</p> <p>Welfare reform has also had a significant impact on disabled residents and the MSG Social Welfare Advice Services (5,860) projects and the service users who had a disability were as follows – of the 41% of beneficiaries that responded: Physical disability 36%, Other Disability 32%, Mental Health 17%, Prefer not to say 8%</p> <p>The recommended LCF projects will provide a comprehensive borough wide service providing advice and information services for residents with disabilities. The impact these services have on this protected characteristic will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding. There are two recommended projects under the advice and information theme which will provide free, confidential, independent and quality assured advice services to Tower Hamlets residents to resolve any problems they may face around a range of topic including welfare benefits, housing and money/debt etc. These are –</p>



			<ul style="list-style-type: none"> <li>• East End Citizens advice Bureaux – Advice Tower Hamlets – Includes consortium of 13 organisations some of which have disabled residents as primary clients.</li> <li>• Island Advice Centre – Tower Hamlets Advice Training and Capacity Building Project</li> </ul>
	Positive	Theme 4-employment and skills	<p>Disabled residents face inequalities within the labour market in Tower Hamlets. During 2014-16, less than half of all working age disabled people were in work compared with three quarters of the non-disabled population (48 vs 74 percent) Disabled people were also more likely to work part-time: in 2011, 39 per cent of disabled workers were employed part-time compared with 24 per cent of non-disabled workers.</p> <p>The MSG Programme included several projects whose beneficiaries who suffered from some type of disability as outlined below - 59% of beneficiaries that responded of which 48% had mental health issues, 29% preferred not to say 9% were Deaf/Partially Deaf 7% had a Learning disability, 6% had another Disability, 3% had a physical disability and 1% were blind or partially sighted.</p> <p>19% of beneficiaries responded in regard to The MSG Raising Attainment (210) Programme with 74% preferring not to disclose whether they had a disability, 23% had a learning disability and 3% had a physical disability.</p> <p>10 per cent of beneficiaries responded in relation to the MSG Community Languages (614) programme with 100% of respondents preferring not to disclose a disability.</p> <p>The recommended LCF projects and in particular Scheme 4A will provide a comprehensive borough wide service that will benefit residents who face barriers to employment in Tower Hamlets such as those people with disabilities. This is line with the need identified in this theme and the service users of the MSG Programmes. Within the Employment and Skills theme there are two projects specifically targeting disadvantaged groups including those with disabilities who face</p>

			<p>additional barriers to employment in Tower Hamlets. These are:</p> <ul style="list-style-type: none"> <li>• REAL DPO – NOW and THEN</li> <li>• Four Corners Ltd – Zoom Film School</li> </ul> <p>Through developing and embedding good practice in the work place for people with disabilities, learning difficulties and physical and mental health barriers to work these projects will work to overcome the persistent inequalities that exist in the labour market. The project will deliver an holistic package of service underpinned by coproduction to support companies in Tower Hamlets develop the confidence and capacity to be excellent employers of disabled people, and increase levels of employment amongst them. In addition, one of the projects in scheme c will focus on nurturing the creative talent, increase confidence and self-esteem, and enable disabled residents to acquire practical skills and experience to support move into creative industries.</p>
	<p>Positive/</p>	<p>Theme 5 Community Safety</p>	<p>Community Safety was not a Theme in the MSG 2015-18 programme</p> <p>From national estimates 2.17 per cent of the adult population would be expected to have a learning disability which equates to 4,848 people in Tower Hamlets. However there are only 961 people in Tower Hamlets registered with GPs as having a learning disability of which 46 per cent were of Asian background, mostly Bangladeshi. People with learning disabilities have poorer health and die younger with a lifespan that is 14 years less for males and 18 years less for females. Their complex health needs means that residents with disabilities are more vulnerable and require additional support.</p> <p>In addition to health vulnerabilities people with disabilities also face prejudice and hate crime, The Mayor’s Office for Policing And Crime (MOPAC) reported that there were 13 instances of disability hate crime offences in Tower Hamlets between June 2018 and June 2019.</p> <p>The LCF projects will work to reduce the exploitation of vulnerable groups such as those with disabilities through the provision of borough wide services. Within the Community Safety theme there are three projects which specifically aim to reduce</p>

			<p>the exploitation of children, young people and other vulnerable groups including those with a disability. There are:</p> <ul style="list-style-type: none"> <li>• Kazzum Arts – Build</li> <li>• Osmani Trust - Schools and Community Resilience Programme</li> <li>• Streets of Growth - Resilient Young Leaders Programme</li> </ul>
Gender	Positive	Theme 1 Inclusion, health & Wellbeing	<p>According to the 2018 Borough Profile, in 2014-16, healthy life expectancy was lower for men and women compared to London and England averages and particularly low for women. Disability-free life expectancy was significantly lower for men and women when compared to London and England averages.</p> <p>The MSG Programme had a mix in regards to participation on gender with the culture theme of (1,458) – of the 46% of beneficiaries that responded: Women 45%, Men 44%, Prefer not to say 11% and in sports (528) – of the 63% of beneficiaries that responded: Women 24%, Men 76%, on Vulnerable &amp; Excluded (230): Women 48%, Men 49%, Prefer not to say 3%, on Youth (635) - of the 86% of beneficiaries that responded: Women 48%, Men 48%, Prefer not to say 4%, on Lifelong Learning &amp; Sport (927) - of the 66% of beneficiaries that responded: Women 59%, Men 32%, Prefer not to say 9%, on Lunch Club (2,189) - of the 36% of beneficiaries that responded: Women 56%, Men 44% and on Prevention Health &amp; Wellbeing (908) - of the 83% of beneficiaries that responded: Women 77%, Men 22%</p> <p>A stated priority of Scheme 1A is increase the use of youth services by girls and young women. This scheme will be measuring the following outcomes that improve gender equality:</p> <ul style="list-style-type: none"> <li>• Children and young people, in particular girls and young women: have more confidence in themselves; are more resilient; and are able to, and do, access a range of spaces, activities and social opportunities across Tower Hamlets</li> <li>• Girls and young women feel included, are able to participate in any service, and are more likely to train to become youth leaders and/or develop their own initiatives</li> </ul> <p>The data from MSG indicates that some types of project were particularly good at engaging with women – namely lunch clubs (56%); lifelong learning and sport (59%)</p>

			<p>and prevention, health and wellbeing (77%)</p> <p>Through the LCF, 12 of the 29 projects have specifically addressed this protected characteristic in their bids with many focusing on women and/or girls as their main target group.</p> <ul style="list-style-type: none"> <li>• Canaan project provides activities for young women aged 11-19 on the Isle of Dogs</li> <li>• Newark Girls in Action project aims to increase access to youth services by girls and young women</li> <li>• Osmani Trust Family Mentoring Project has a stated outcome that young people and girls are able to access a range of spaces, activities and social opportunities across Tower Hamlets</li> <li>• St Hilda's Girls Driven project is a project designed to support girls and young women and will work with girls from diverse backgrounds with a wide range of activities</li> <li>• Stifford Young Girl's project seeks to empower girls from hard-to-reach BME backgrounds with a safe space participate in a range of activities that encourage their wellbeing, confidence and learn skills.</li> <li>• Yard Theatre Tower Hamlets Teens project says it will be open to everyone irrespective of gender and at least 65% of participants will be female. One of its stated outcomes is to transform young women into the community and cultural leader of tomorrow.</li> <li>• Age UK Friend at Home project to visit housebound older people states that 64% of the people they work with are female</li> <li>• London Tigers Exercise for Health Project is specifically aimed at BME women, with women only classes led by female coaches. It specifically addresses barriers to exercise faced by Muslim women as well as others faced by young Bangladeshi males. There are specific targets in relation to women.</li> <li>• The Mudchute Association has specific targets for the numbers of girls engaging with the project.</li> <li>• Newark Youth's project is specifically focused on children and young people</li> </ul>
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			<p>and includes sports sessions specifically for girls and women including sessions for mothers and daughters and sessions for men including fathers and sons</p> <ul style="list-style-type: none"> <li>• The consortium led by Stifford Centre includes an organisation specifically for women- Black Women's Health and Family Support and has a number of sessions specifically for women. It also includes dedicated sessions for men.</li> <li>• The Bangladesh Youth Movement's project is focused on health activities for BME women.</li> </ul> <p>There is a broad range of provision across a number of different types of project, including youth activities, social activities, health development and sport. It will be important to ensure that any variation in the nature of activities provided under LCF compared to MSG does not result in an unintentional decrease in participation from women.</p>
	Positive	Theme 2- Digital I- inclusion	<p>Although Digital Inclusion was a cross-cutting theme in the MSG 2015-18 programme there was not a specific Theme / Strand</p> <p>The Tower Hamlets Annual Residents Survey 2018 found that while 92 per cent of residents surveyed said they had access to the internet, There was a similar split between the gender of respondents with 93 per cent of males and 91 per cent of females having access to the internet in Tower Hamlets.</p> <p>84 per cent of overall respondents confirmed they used the internet for emails with of which 87 per cent were male and 81 per cent were female, Results were similar for using the internet for browsing for information about goods and services with 77 per cent of male and 74 per cent of female respondents confirming they use this internet for this purpose. Similarly social media use on the internet was comparable between male and females being 73 per cent and 70 percent respectively. There was a bigger difference between respondents who used the internet for banking. 66 per cent of males surveys revealed they did while only 58 per cent of females agreeing.</p> <p>The recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers in accessing digital platforms, information</p>

			<p>about online safety and ICT skills and digital careers in Tower Hamlets as outlined above and will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding. The Society Links Tower Hamlets – E-Safety Champions project will train local women to become champions for e-safety in the community. Weekly workshops will cover all areas of online safety and once trained, champions will go into schools and community groups to spread their knowledge to young people and parents/carers through presentations and workshops.</p>
	Positive	Theme 3 – Advice and information	<p>The take up of services for Social Welfare Advice Services (5,860): in the MSG Programme was similar between gender with Women at 55%, and Men at 44%, with 1% preferring not to say</p> <p>No positive or negatives can be identified at this stage. All projects will be required to demonstrate how they involve residents from diverse backgrounds and provide equalities information on service users. All providers will also be required to demonstrate due regard in service delivery and mitigate adverse impact on any particular group.</p> <p>The recommended LCF projects will provide a comprehensive borough wide service which will include many existing providers with a strong track record of ensuring people with equalities protected characteristics are included in service provision. This will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding. There are two recommended projects under the advice and information theme which will provide free, confidential, independent and quality assured advice services to Tower Hamlets residents to resolve any problems they may face around a range of topic including welfare benefits, housing and money/debt etc. These are –</p> <p>East End Citizens advice Bureaux – Advice Tower Hamlets – Includes consortium of 13 organisations some of whose primary clients are women. Island Advice Centre – Tower Hamlets Advice Training and Capacity Building Project</p>
	Positive	Theme 4- Employm	<p>BME women face inequalities within the labour market in Tower Hamlets. During 2014-16, less than half of the borough’s BME women were in work (48 per cent).</p>

		ent & Skills	<p>Rates were lowest for Bangladeshi and Somali women – just one quarter of these women were in employment at the time of the 2011 census. Employment rates are particularly low for Bangladeshi and Pakistani women (26 and 35 per cent) - these two populations have the widest gender gap in employment rates across all ethnic groups. Men have higher employment rates than women across all groups, except for the Black Caribbean population, where women are a bit more likely than men to be in work (64 vs 60 per cent).</p> <p>Several MSG Programmes addressed the employment inequalities that exist and of the 96 per cent of beneficiaries that responded in relation to the MSG Routeways to Employment (341) Programme 74 per cent were women and 25 per cent were men. The beneficiaries of the MSG Raising attainment Programme were 49 per cent women and 51 per cent men which is somewhat reflective of the fact that on average, girls have higher attainment levels in schools in the borough than boys and there is additional focus required in this area for males.</p> <p>Of the 54% of respondents of the MSG Community Language programme 49 per cent were women and 51 per cent men.</p> <p>The recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers to employment in Tower Hamlets and will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding. This is line with the need identified in this theme and the service users of the MSG Programmes. Within the Employment and Skills theme there are four projects specifically targeting disadvantaged groups including women who face additional barriers to employment in Tower Hamlets. These are:</p> <ul style="list-style-type: none"> <li>• Limehouse Project – Developing potential</li> <li>• Society Links Tower Hamlets – Job Club</li> <li>• Four Corners Ltd – ZOOM Film School</li> <li>• The Bromley by Bow Centre – Creative Communities</li> </ul> <p>As outlined above women in Tower Hamlets face barriers to employment and the recommended LCF Projects will work to develop skills and enable women to make</p>
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			<p>informed choices on their futures, supporting them into training, volunteering and work. In addition, weekly job club session will be held which will include tailored employment support with creating a CV, accessing emails, job searching, applications and using universal job match. Projects will also be run to help women who have been long-term unemployed, economically inactive, isolated and disenfranchised in order to improve their job prospects.</p>
	<p>Positive/</p>	<p>Theme 5– Communi ty Safety</p>	<p>Community Safety was not a Theme in the MSG 2015-18 programme.</p> <p>There are around 12,900 more male residents than female residents in Tower Hamlets that puts the male to female ratio at 10.9. While this isn't a significant difference there is significant overrepresentation of women as victims in cases of domestic violence and sexual offences. The Mayor's Office for Policing and Crime (MOPAC) report that there were 3,658 instances of domestic abuse offences reported in the 12 month period between June 2018 and June 2019. 88 per cent of victims were female and while it is recognised that males can to be victims of domestic violence females are disproportionately impacted by it. MOPAC also report that there were 783 sexual offences reported in Tower Hamlets in this same time period of which 87 per cent of victims were female.</p> <p>These stark numbers support the need for the community safety theme to be created from the LCF and the projects commissioned will work to further reduce the exploitation of vulnerable residents including women in the borough. In particular, scheme 5C focuses on services for people affected by domestic violence or other unsafe circumstances which as outlined above are predominantly women,</p> <p>Within the Community Safety theme there is one project which specially targets people affected by domestic violence or other unsafe circumstances. This is:</p> <ul style="list-style-type: none"> <li>• Hestia Housing and Support – Families Safe and Secure in Tower Hamlets</li> </ul> <p>This project will support families who have experiences DVSA and who are living in a local refuge to address the trauma they've faced and to learn about what a healthy relationship looks like. It will also raise awareness amongst the Tower Hamlets</p>



			community of domestic violence and how to report it.
Gender Reassignment	Positive	Theme 1 – Inclusion, Health & wellbeing	<p>Scheme 1A and 1E have stated outcomes that children, young people and people with disabilities who may feel excluded from participating in mainstream services and activities (e.g. from minority groups, who are disabled, who are LGBTQI, or who are carers for others) can participate in a range of activities and experiences.</p> <p>None of the MSG strands had statistically significant representation of transgender beneficiaries reported. Only 4 beneficiaries out of over 6,000 across all the strands relevant to this theme in the snapshot period identified as transgender</p> <p>None of the schemes specifically focus on gender reassignment. However, all projects will be required to demonstrate how they are inclusive and welcoming for people of different backgrounds. All providers will also be required to demonstrate due regard in service delivery and mitigate adverse impact on any particular group</p> <p>4 projects have specifically addressed this protected characteristic in their bids:</p> <ul style="list-style-type: none"> <li>• ELOP Tower Hamlets LGBT Support project will enhance peer networks, lessen isolation and provide mental health crisis prevention support to the Lesbian, Gay, Bisexual and Transgender community</li> <li>• Yard Theatre Tower Hamlets Teens project says it will be open to everyone irrespective of sexual orientation and at least 15% of participants will be LGBTQ</li> <li>• The Globe Community Project is targeted at a number of hard to reach groups including LGBTQ people.</li> <li>• The Real project aims to make more mainstream services culturally inclusive, welcoming and accessible for disabled people and people experiencing mental health issues who are LGBTQI</li> </ul>
	Positive	Theme 2- Digital Inclusion	<p>Although Digital Inclusion was a cross-cutting theme in the MSG 2015-18 programme there was not a specific Theme / Strand</p> <p>There is limited information relating to this protected characteristic and digital inclusion however the recommended LCF projects will provide a comprehensive</p>

			<p>borough wide service that will benefit residents who face barriers in accessing digital platforms, information about online safety and ICT skills and digital careers in Tower Hamlets as outlined above and will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding</p>
	Positive	Theme 3- Advice & Information	<p>There is limited information available in relation to this protected characteristic and advice and information services in Tower Hamlets. In addition, the monitoring information for the MSG Programmes has not reported that transgender residents have utilised these services - MSG Social Welfare Advice Services (5,860): 0% reported as transgender.</p> <p>The recommended LCF projects will provide a comprehensive borough wide service which will include many existing providers with a strong track record of ensuring people with equalities protected characteristics are included in service provision. This will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding. There are two recommended projects under the advice and information theme which will provide free, confidential, independent and quality assured advice services to Tower Hamlets residents to resolve any problems they may face around a range of topic including welfare benefits, housing and money/debt etc. These are –</p> <p>East End Citizens advice Bureaux – Advice Tower Hamlets – Includes consortium of 13 organisations Island Advice Centre – Tower Hamlets Advice Training and Capacity Building Project</p>
	Positive	Theme 4- Employment and Skills	<p>There is limited information available in relation to this protected characteristic and employment in Tower Hamlets. In addition, the monitoring information for the MSG Programmes have not reported that transgender residents have utilised these services as outlined below:</p> <p>MSG Routeways to Employment (341): 0% reported as transgender</p> <p>MSG Raising Attainment (210): 0% reported as transgender</p>

			<p>MSG Community Languages (614): 0% reported as transgender</p> <p>However, the recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers to employment in Tower Hamlets and this protected characteristic will continue to be monitored through ongoing assessment of LCF projects during the lifetime of the funding</p> <p>Within the Employment and Skills theme there are two projects specifically targeting disadvantaged groups who face additional barriers to employment in Tower Hamlets. These are:</p> <ul style="list-style-type: none"> <li>• The Bromley by Bow Centre – Creative Communities</li> <li>• Society Links Tower Hamlets – Job Club</li> </ul>
	Positive/	Theme 5-Community Safety	<p>Community Safety was not a Theme in the MSG 2015-18 programme.</p> <p>The number of people undergoing gender reassignment in Tower Hamlets is unknown however we know inequalities with this cohort exist. The Mayor’s Office for Policing And Crime (MOPAC) reported that there were 7 instances of transgender hate crime offences in Tower Hamlets between June 2018 and June 2019.</p> <p>The LCF projects will work to reduce the exploitation of vulnerable groups in the borough and within the Community Safety theme there are three projects which specifically aim to reduce the exploitation of children, young people and other vulnerable groups. These are:</p> <ul style="list-style-type: none"> <li>• Kazzum Arts – Build</li> <li>• Osmani Trust - Schools and Community Resilience Programme</li> <li>• Streets of Growth - Resilient Young Leaders Programme</li> </ul>
Sexual Orientation	Positive	Theme 1-Inclusion, Health and	<p>Scheme 1A and 1E have stated outcomes that children, young people and people who may feel excluded from participating in mainstream services and activities (e.g. from minority groups, who are disabled, who are LGBTQI, or who are carers for others) can participate in a range of activities and experiences.</p>

		Wellbeing	<p>The MSG data indicates that between 0 and 3% of beneficiaries declared themselves to be Lesbian, Gay or Bisexual in the projects relevant to this theme.</p> <p>4 projects have specifically addressed this protected characteristic in their bids:</p> <ul style="list-style-type: none"> <li>• ELOP Tower Hamlets LGBT Support project will enhance peer networks, lessen isolation and provide mental health crisis prevention support to the Lesbian, Gay, Bisexual and Transgender community</li> <li>• Yard Theatre Tower Hamlets Teens project says it will be open to everyone irrespective of sexual orientation and at least 15% of participants will be LGBTQ</li> <li>• The Globe Community Project is targeted at a number of hard to reach groups including LGBTQ people.</li> <li>• The Real project aims to make more mainstream services culturally inclusive, welcoming and accessible for disabled people and people experiencing mental health issues who are LGBTQI</li> </ul>
	Positive	Theme 2- Digital Inclusion	<p>Although Digital Inclusion was a cross-cutting theme in the MSG 2015-18 programme there was not a specific Theme / Strand</p> <p>There is limited information relating to this protected characteristic and digital inclusion in Tower Hamlets however the recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers in accessing digital platforms, information about online safety and ICT skills and digital careers in Tower Hamlets as outlined above and will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding</p>
	Positive	Theme 3- Advice and Information	<p>There is limited information available in relation to this protected characteristic and advice and information services in Tower Hamlets. In addition, the monitoring information for the MSG Programmes have not reported the following - MSG Social Welfare Advice Services (5,860) – of the 42% of beneficiaries that responded: Heterosexual 76%, Prefer not to say 24%</p> <p>The recommended LCF projects will provide a comprehensive borough wide service which will include many existing providers with a strong track record of ensuring</p>

			<p>people with equalities protected characteristics are included in service provision. This will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding. There are two recommended projects under the advice and information theme which will provide free, confidential, independent and quality assured advice services to Tower Hamlets residents to resolve any problems they may face around a range of topic including welfare benefits, housing and money/debt etc. These are –</p> <ul style="list-style-type: none"> <li>• East End Citizens advice Bureaux – Advice Tower Hamlets</li> <li>• Island Advice Centre – Tower Hamlets Advice Training and Capacity Building Project</li> </ul>
	<p>Positive</p>	<p>Theme 4 – Employment and skills</p>	<p>There is limited information about sexual orientation and employment in Tower Hamlets. The monitoring information for MSG Projects in relation to sexual orientation is outlined below:</p> <p>MSG Routeways to Employment (341) – of the 90% of beneficiaries that responded: Heterosexual 81%, Gay 2%, Bisexual 1%, Prefer not to say 16%</p> <p>MSG Raising Attainment (210) – of the 46% of beneficiaries that responded: Heterosexual 60%, Prefer not to say 40%</p> <p>MSG Community Languages (614) – of the 10% of beneficiaries that responded: Prefer not to say 100%</p> <p>However, the recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers to employment in Tower Hamlets and this protected characteristic will continue to be monitored through ongoing assessment of LCF projects during the lifetime of the funding Within the Employment and Skills theme there are two projects specifically targeting disadvantaged groups who face additional barriers to employment in Tower Hamlets. These are:</p> <ul style="list-style-type: none"> <li>• The Bromley by Bow Centre – Creative Communities</li> </ul>

			<ul style="list-style-type: none"> <li>• Society Links Tower Hamlets – Job Club</li> </ul>
	Positive	Theme 5-Community Safety	<p>Community Safety was not a Theme in the MSG 2015-18 programme.</p> <p>There is limited information about the sexual orientation of people in Tower Hamlets however we know inequalities with this cohort exist. The Mayor’s Office for Policing And Crime (MOPAC) reported that there were 112 instances of sexual orientation hate crime offences in Tower Hamlets between June 2018 and June 2019.</p> <p>These instances support the need for the creation of the community safety theme under the LCF project which will work to reduce the exploitation of vulnerable groups in the borough and within the Community Safety theme there are three projects which specifically aim to reduce the exploitation of children, young people and other vulnerable groups. There are:</p> <ul style="list-style-type: none"> <li>• Kazzum Arts – Build</li> <li>• Osmani Trust - Schools and Community Resilience Programme</li> <li>• Streets of Growth - Resilient Young Leaders Programme</li> </ul>
Religion or Belief	Positive	Theme 1 – Inclusion, Health & wellbeing	<p>None of the schemes specifically focus on any religion or belief. All projects will be required to demonstrate how they are culturally inclusive and welcoming for people of different ethnic backgrounds. All providers will also be required to demonstrate due regard in service delivery and mitigate adverse impact on any particular group</p> <p>The MSG data shows that the majority of beneficiaries, who indicated a faith, were Christian or Muslim, with percentages from 26% to 82% for Muslims depending on the theme and 6% to 40% for Christian. A number of other faiths with much smaller proportions of beneficiaries were also recorded. Between 2 and 25% declared that they had no religion and in some areas there was up to 4% of beneficiaries who declared themselves to be humanist.</p> <p>The following 2 projects have specifically addressed this protected characteristic in their bids.</p>

			<ul style="list-style-type: none"> <li>• The Real project aims to make more mainstream services culturally inclusive, welcoming and accessible for disabled people and people experiencing mental health issues from different faith backgrounds.</li> <li>• The London Tigers project specifically addresses barriers to exercise faced by Muslim women</li> </ul>
	Positive	Theme 2- Digital Inclusion	<p>Although Digital Inclusion was a cross-cutting theme in the MSG 2015-18 programme there was not a specific Theme / Strand</p> <p>There is limited information relating to this protected characteristic and digital inclusion in Tower Hamlets however the recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers in accessing digital platforms, information about online safety and ICT skills and digital careers in Tower Hamlets as outlined above and will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding</p>
	Positive	Theme 3- Advice & information	<p>There is limited information available in relation to this protected characteristic and advice and information services in Tower Hamlets. In addition, the monitoring information for the MSG Programmes have not reported the following about the MSG Programme service users - MSG Social Welfare Advice Services (5,860) – of the 43% of beneficiaries that responded: Muslim 67%, Prefer not to say 26%, Christian 4%, Hindu 1%, No Religion 1%, Other Religion 1%</p> <p>The recommended LCF projects will provide a comprehensive borough wide service which will include many existing providers with a strong track record of ensuring people with equalities protected characteristics are included in service provision. This will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding. There are two recommended projects under the advice and information theme which will provide free, confidential, independent and quality assured advice services to Tower Hamlets residents to resolve any problems they may face around a range of topic including welfare benefits, housing and money/debt etc. These are –</p> <ul style="list-style-type: none"> <li>• East End Citizens advice Bureaux – Advice Tower Hamlets – Includes a</li> </ul>

			<p>consortium of 13 organisations</p> <ul style="list-style-type: none"> <li>Island Advice Centre – Tower Hamlets Advice Training and Capacity Building Project</li> </ul>
	Positive	Theme 4- Employment and skills	<p>From national and local data we know there are significant employment inequalities facing Muslim women compared to other groups and is a key priority locally.</p> <p>The monitoring information about beneficiaries of the MSG Projects is set out below:</p> <p>MSG Routeways to Employment (341) – of the 91% of beneficiaries that responded: Muslim 60%, Christian 15%, No Religion 12%, Prefer not to say 6%, Other Religion 3%, Agnostic 2%, Buddhist 2%, Sikh 1%</p> <p>MSG Raising Attainment (210) – of the 88% of beneficiaries that responded: Muslim 84%, No Religion 9%, Christian 4%, Buddhist 2%, Prefer not to say 1%</p> <p>MSG Community Languages (614) – of the 35% of beneficiaries that responded: Muslim 100%</p> <p>The recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers to employment in Tower Hamlets and this protected characteristic will continue to be monitored through ongoing assessment of LCF projects during the lifetime of the funding</p> <p>Within the Employment and Skills theme there are a number of projects specifically targeting disadvantaged groups who face additional barriers to employment in Tower Hamlets. These include:</p> <ul style="list-style-type: none"> <li>Society Links Tower Hamlets – Job Club</li> <li>Stifford Centre Limited – BME Women’s Employment Support Programme</li> <li>Four Corners Limited – ZOOM Film School</li> <li>The Bromley by Bow Centre – Creative Communities</li> </ul>
	Positive	Theme 5- Community Safety	<p>Community Safety was not a Theme in the MSG 2015-18 programme.</p> <p>Tower Hamlets has the highest proportion of Muslim residents in the country. In</p>



			<p>2011, 38 per cent of borough residents were Muslim compared with 5 per cent in England and 13 per cent in London. Other smaller, but significant, faith groups represented in the borough include: Hindu (1.8 per cent), Buddhist (1.2 per cent) Jewish (0.6 per cent) and Sikh (0.4 per cent).</p> <p>The Mayor's Office for Policing And Crime (MOPAC) reported that there were 10 instances of anti-Semitic hate crime offences, 141 faith hate crime offences and 106 Islamophobic offences, in Tower Hamlets between June 2018 and June 2019.</p> <p>These instances support the need for the creation of the community safety theme under the LCF project which will work to reduce the exploitation of vulnerable groups in the borough and within the Community Safety theme there are three projects which specifically aim to reduce the exploitation of children, young people and other vulnerable groups. These are:</p> <ul style="list-style-type: none"> <li>• Kazzum Arts – Build</li> <li>• Osmani Trust - Schools and Community Resilience Programme</li> <li>• Streets of Growth - Resilient Young Leaders Programme</li> </ul>
Age	Adverse	Theme 1- Inclusion, Health & Wellbeing	<p><b>Young people</b></p> <p>According to the HMRC's Children in Low Income Families Local Measure, around 20,270 children in Tower Hamlets were living below the national poverty line in 2016 – this represents 32.5 per cent of children in the borough – the highest rate in Great Britain. In addition, welfare reform is likely to add increased financial pressures for families in receipt of benefits, presenting a key challenge for some families.</p> <p>A high proportion of children are eligible for free school meals. This is based on means tested benefits and is an indicator of the level of financial need within families with children. 33 per cent of our primary pupils are eligible for and claim free school meals, compared with 16 per cent in London and the national average of 14 percent. Similarly, 40 per cent of our secondary pupils are eligible for and claim free school meals, compared with the London average of 17 per cent and the national average of 13 percent.</p> <p>At the end of 2016, 6 per cent of 16-17 year olds in Tower Hamlets were NEET</p>

		<p>(including those whose activity is unknown), which is line with the national average (6 per cent) and slightly higher than the London average (5 per cent). However White British young people are over represented in NEET cohort.</p> <p>The rate of children with one or more decayed or missing teeth has gone down and in 2015 it was 36 per cent. However this was the third highest rate across all London boroughs.</p> <p>43 per cent of children in year 6 were overweight or obese compared with 39 per cent in London and 34 per cent nationally. In 2016/17, the prevalence of diabetes in Tower Hamlets was 6.8 per cent, which was slightly higher than London (6.5 per cent), but similar to England (6.7 per cent).</p> <p>Scheme 1A is aimed at improving outcomes for children, young people and families. 11 projects for schemes 1A have specifically addressed children and young people in their bids as the main focus of their activities:</p> <ul style="list-style-type: none"> <li>• Canaan project provides activities for young women aged 11-19 on the Isle of Dogs</li> <li>• Half Moon Theatre project offers professional theatre shows and drama activities for children and young people from 0-18 (or 25 for disabled young people) from all backgrounds.</li> <li>• Newark Girls in Action project aims to increase access to youth services by girls and young women</li> <li>• Osmani Trust Family Mentoring Project aims to provide through family mentoring a range of Early Help support to children, young people and their families to help them overcome their immediate challenges and meet their needs in order for them to thrive in healthy and safe families.</li> <li>• St Hilda's Girls Driven project is a project designed to support girls and young women and will work with girls from diverse backgrounds with a wide range of activities</li> <li>• Stifford Young Girl's project seeks to empower girls from hard-to-reach BME backgrounds with a safe space participate in a range of activities that encourage their wellbeing, confidence and learn skills.</li> </ul>
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			<ul style="list-style-type: none"> <li>• Yard Theatre Tower Hamlets Teens project offers youth leadership workshops, drama workshops, summer masterclasses, and schools performances for Tower Hamlets teenagers.</li> <li>• London Tigers Exercise for health Project is specifically aimed at children and young people, identifying the barriers they face and the inequality of outcomes, particularly those faced by young Bangladeshi males. There are specific targets in relation to children and young people.</li> <li>• Mudhcute Association's project specifically targets children but also has specific targets for the numbers of older people engaging with the project.</li> <li>• Newark Youth's project is specifically focused on children and young people and also has specific sessions for older people.</li> <li>• The St Hildas East project focuses on young people with disabilities and learning disabilities.</li> </ul> <p>These projects represent a broad and varied range of activities and target groups including both children and young people. The age group that does, however appear to be missing is the Early Years age group i.e. 0-5 years of age. Whilst there is no comparative MSG data, as it does not measure less than 5 years old, it is clear that this age group is a particular group that is not being served through the LCF as it currently stands and this would need addressing. As discussed under disability, above, it is also apparent that whilst there are projects concentrating on disability and learning disability amongst young people there is a gap around young people and mental health which should be addressed.</p> <p>The consideration of young carers is discussed under other factors below.</p> <p><b>Older People</b> The Tower Hamlets Joint Strategic Needs Assessment 2016 for Older People in Tower Hamlets stated:</p> <ul style="list-style-type: none"> <li>• In 2015, less older people (36%; 5,948) were living alone in TH compared to in London (37%) but similar to England (36%).</li> <li>• Depression: is estimated at 10-15% of the older population and severe</li> </ul>
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			<p>depression is estimated at 3%.</p> <ul style="list-style-type: none"> <li>• Approximately 11.4% of the Serious Mental Illness register is made up of people aged 65 and over.</li> <li>• Dementia: (as per September 2015):             <ul style="list-style-type: none"> <li>○ There were 826 residents aged 65 and over with a diagnosis of dementia. The primary care recorded prevalence of dementia in Tower Hamlets was significantly higher (4.87%) than in London (4.27%) and England (4.27%).</li> <li>○ There were 759 emergency admissions for residents aged 65 and over with a mention of dementia and the age standardised rate of emergency admissions was significantly higher (4,478 per 100,000 population) than for London and England.</li> <li>○ However, the age standardised mortality rate in residents with a recorded mention of dementia (752 per 100,000 population) was similar to London (687) and England (750) in 2014.</li> <li>○ Older population set to be fastest growing age group: 39% increase expected by 2028.</li> <li>○ Admissions to care homes for older people decreased from 613 to 492 per 100,000 of the population, as more as more people are helped to stay in their own homes for longer. (local account)</li> </ul> </li> </ul> <p>Scheme 1B is to improve outcomes for older people. 13 projects under this scheme have specifically addressed older people in their bids as the main focus of their activities</p> <ul style="list-style-type: none"> <li>• Age UK Caxton Hall activities are designed to help reduce loneliness and isolation and increases inclusion among older people by providing activities that increase their health and wellbeing, connections and visibility in the community.</li> <li>• Age UK Friend at Home project matches housebound older people who with volunteers who can offer company at home. It matches up to 120 older people who are frail, housebound and isolated with friendship volunteers.</li> </ul>
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			<ul style="list-style-type: none"> <li>• The Vietnamese and Chinese Lunch and Social Club project will provide healthy lunches and social and health promotion activities for up to 60 older people, aged over 50, primarily from the Vietnamese and Chinese community in Tower Hamlets.</li> <li>• ELOP Tower Hamlets LGBT Support project will enhance peer networks, lessen isolation and provide mental health crisis prevention support. It offers two facilitated social support groups one group will be for older people</li> <li>• St Hilda’s Older People’s Feeling Good project is for older people from throughout the Borough, Providing lunches and opportunities such as indoor sport, IT learning, singing, art, intergenerational activities with schoolchildren and outings</li> <li>• Stifford Older People’s Lunch Club offers social sessions to older people in the local community to combat isolation and encourage them to feel part of the community by contributing to it. It provides support for dementia sufferers and their carers,</li> <li>• Tower Hamlets Friends and Neighbours Older People’s Befriending project will be providing befriending and advocacy services to older people in the borough.</li> <li>• Toynbee Hall Wellbeing Centre will offer relational support to older people aged 50+ in Tower Hamlets. It will build stronger networks of information sharing and peer-support between users and those not accessing services.</li> <li>• The Globe Community Project is targeted at a number of hard to reach groups including over 50s.</li> <li>• Mudhcute Association’s project specifically targets children but also has specific targets for the numbers of older people engaging with the project.</li> <li>• Newark Youth’s project is specifically focused on children and young people and also has specific sessions for older people.</li> <li>• The consortium led by Stifford Centre includes a number of sessions specifically for the 50+ age group.</li> <li>• The Working Well Trust project focuses on people with mental health issues and includes specific provision for a third of clients to be those over the age of 50 and has specific targets relating to the service provided to older people.</li> </ul>
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			<p>There is a broad range of services funded for older people. Comparing with MSG, it is noticeable, however, that particular types of projects are particularly effective at engaging older people. 93% of lunch club beneficiaries were older people and there were 2189 beneficiaries. A number of the LCF projects will similarly be able to attract large numbers and proportions of older people and address social isolation, whether or not they operate as a lunch club or using some other method. Different methods of delivery may however present a challenge for some more traditional or isolated communities, including BME communities. There is a need to ensure that social isolation in BME older people continues to be addressed throughout the LCF and consideration of how this happens during the transition to the LCF and in the longer term needs to be considered.</p> <p>From our analysis the proposed change could potentially have an adverse impact on particular age groups. Through contract mobilisation we will identify how proposed bidders will ensure those gaps are addressed. Furthermore, through the transition support for the LCF programme we will support existing providers to refer clients to other providers and also provide capacity building support to them.</p>
	<p>Positive</p>	<p>Theme 2- Digital Inclusion</p>	<p>Although Digital Inclusion was a cross-cutting theme in the MSG 2015-18 programme there was not a specific Theme / Strand</p> <p>Today in the UK, there are over eleven million people who lack the basic digital skills they need to participate fully in our digital economy. The Office of National Statistics suggests that there is no single reason for people being digitally excluded but the main reasons tends to include:</p> <ul style="list-style-type: none"> <li>• A lack of interest in the internet and digital (59%)</li> <li>• A belief they lack the skills to go online (21%)</li> <li>• The cost of equipment (9%)</li> </ul> <p>We know that older people face additional barriers in relation to digital platforms and are more likely to be digitally excluded. The Tower Hamlets Annual Residents Survey found that levels of internet access are strongly related to age. All those surveyed who are aged 18 – 34 had access to the internet compared with just over half of those aged 60 and over (100 vs 54 per cent). Older residents were far less</p>

			<p>likely to use and prefer online methods. Just 5 per cent of those aged 60 and over said they had made contact via email compared with 20 per cent of those aged 18 - 34. In contrast, older residents were more likely than younger residents to say they had made contact in person (at a council office, one stop shop/idea store or library) (23 v 9 per cent)</p> <p>The recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers in accessing digital platforms, information about online safety and ICT skills and digital careers in Tower Hamlets as outlined above and will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding.</p> <p>In particular Scheme 2A will work to support and train older people to make them feel more informed and digitally included. Scheme 2B will also work to support people of all ages to be more aware of potential online dangers including online scams, online bullying and how to keep themselves safe.</p> <p>The following recommended projects will aim to prevent digital exclusion in older adults in order to prevent social isolation and increase their ability to access online health related support:</p> <ul style="list-style-type: none"> <li>• Limehouse Project – DigiTIES</li> <li>• Newham New Deal Partnership - @online club network Tower Hamlets</li> <li>• Wapping Bangladesh Association – Digital First</li> </ul> <p>In addition the following project will work to build the digital resilience of children and young people and their families and raise the awareness of online safety with parents so that as families they are safe from risk and able to utilise digital resources –</p> <p>Sporting Foundation – Building Digital Resilience Society Links – E safety Champions</p>
	Positive	Theme 3- Advice &	Access to social welfare advice is likely to have a beneficial impact on older people. Tower Hamlets has the highest rate of social care need for older residents in the

		<p>Information</p>	<p>country. In Tower Hamlets, the population of residents aged 65 and over is expected to grow by 39 per cent over the next ten years, compared with 17 per cent growth of the working age population. Borough residents also face the worst disability-free life expectancy in London. Men in Tower Hamlets have a disability-free life expectancy of 56.9 years compared with 63.8 years in London, and women in Tower Hamlets have a disability-free life expectancy of 56.4 years compared with 63.7 years in London. Tower Hamlets has the highest rate of social care need for older residents (aged 65 and over) in the country, at a rate of 12,235 service users per 100,000 population compared with 7,515 in London and 5,845 in England.</p> <p>The MSG Programme included Social Welfare Advice Services (5,860) – of the 95% of beneficiaries that responded: 26-49 year old 62%, 50-64 22%, 18-25 8%, 65+ 6%, 12-17 1%, Prefer not to say 1%</p> <p>The recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who need advice and information services in Tower Hamlets and will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding. This is line with the need identified in this theme and the service users of the MSG Programme the recommended projects will include welfare advice and information services for older residents on a range of issues. There are two recommended projects under the advice and information theme which will provide free, confidential, independent and quality assured advice services to Tower Hamlets residents to resolve any problems they may face around a range of topic including welfare benefits, housing and money/debt etc. These are –</p> <ul style="list-style-type: none"> <li>• East End Citizens advice Bureaux – Advice Tower Hamlets – Includes consortium of 13 organisations some of whose primary clients are older people.</li> <li>• Island Advice Centre – Tower Hamlets Advice Training and Capacity Building Project</li> </ul>
	<p>Positive</p>	<p>Theme 4- Employment and Skills</p>	<p>Employment levels vary considerably across different population groups. By age, employment rates tend to peak for people in the 25-49 age group: during 2014-16, almost four in five adults in this age group were in work (78 per cent).</p>



		<p>Older residents aged 50 and over face inequalities within the labour market in Tower Hamlets. The employment rate for older workers in Tower Hamlets is relatively low. 58 per cent of borough residents aged 50-64 were in work compared with 69 per cent across London.</p> <p>Employment rates are typically low for young adults, many of whom are students. In Tower Hamlets, less than half of those aged 16-24 were in work during 2014-16. The 2011 Census found that over one third (36 per cent) of residents aged 16-24 were not in work because they were in full-time education. Young people are also more likely to be unemployed than other age groups. At the time of the 2011 Census, 14 per cent of young residents aged 16-24 said they were unemployed compared with 7 per cent of those aged 25-64.</p> <p>The monitoring information about beneficiaries of the MSG projects relating to employment is set out below.</p> <p>MSG Routeways to Employment (341) – of the 92% of beneficiaries that responded: 26-49 year old 59%, 50-64 18%, 18-25 16%, Prefer not to say 4%, 12-17 3%</p> <p>MSG Raising Attainment (210): 12-17 year old 55%, 5-11 43%, 18-25 1%</p> <p>MSG Community Languages (614): 5-11 year old 76%, 12-17 17%, 0-4 7%</p> <p>The recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers to employment Tower Hamlets as outlined above and will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding. This is line with the need identified in this theme and the service users of the MSG Programmes. Within the Employment and Skills theme there is one project specifically targeting disadvantaged groups including young people who face additional barriers to employment in Tower Hamlets. These are:</p> <ul style="list-style-type: none"> <li>• St Giles Trust – Choices Tower Hamlets</li> <li>• Auto Italia South East – Learning Live</li> <li>• Magic Me – Artworks</li> </ul>
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			<p>Among other things these projects will support NEET young people who are facing multiple disadvantages to access education, skills development and employment as well as aiming to show case skills and talents of young people from the performing arts facilities,</p>
	Positive	Theme 5- Communi- ty Safety	<p>Community Safety was not a Theme in the MSG 2015-18 programme.</p> <p>Tower Hamlets has the 4<sup>th</sup> youngest population in the UK. Almost half of residents (46 per cent) are aged 20 – 39. It also has the highest rate of child poverty in Great Britain, 31 per cent of children live in families below the poverty line, almost double the rate nationally (17 per cent). Almost four in five children in the borough live in families reliant of tax credits, which provide means tested support for in work and out of work families.</p> <p>The high levels of deprivation impact children in the borough and give rise to a number of vulnerabilities that will be addressed through the LCF. Scheme 5A works to specially reduce the exploitation of children and young people while scheme 5B will work to improve the perception of young people in the community. The need for this arises through the Mayor's Office for Policing And Crime (MOPAC) reporting that 9.5 per cent of perpetrators of reported hate crime offences between June 2018 and June 2019 were aged less than 18 years of age. While there were 679 instances of youth violence reported in the year ending January 2018 which has damaged the perception of young people in the borough.</p> <p>These instances support the need for the creation of the community safety theme under the LCF project which will work to reduce the exploitation of vulnerable groups in the borough and within the Community Safety theme there are three projects which specifically aim to reduce the exploitation of children, young people and other vulnerable groups. These are:</p> <ul style="list-style-type: none"> <li>• Kazzum Arts – Build</li> <li>• Osmani Trust - Schools and Community Resilience Programme</li> <li>• Streets of Growth - Resilient Young Leaders Programme</li> </ul>

			<p>In addition, there are two projects which will work to improve the perception of young people in the community. These projects will offer intergenerational photography projects for different age groups to address misconceptions between older and younger people to promote positive attitude and mutual understandings. These are:</p> <ul style="list-style-type: none"> <li>• Four Corners – Into Focus Photography project</li> <li>• Leaders in community – project connect</li> </ul>
Marriage and Civil Partnerships	Positive	Theme 1- Inclusion, Health & Wellbeing	<p>None of the schemes specifically focus on marriage and civil partnerships. All projects will be required to demonstrate how they are inclusive and welcoming for people of different backgrounds. All providers will also be required to demonstrate due regard in service delivery and mitigate adverse impact on any particular group.</p> <p>The following is the data from MSG of relevance to this theme</p> <p>MSG Culture (1,458) – of the 1% of beneficiaries that responded: Single 80%, Married 20%</p> <p>MSG Sports (528) – of the 52% of beneficiaries that responded: Single 100%</p> <p>MSG Vulnerable &amp; Excluded (230) – of the 51% of beneficiaries that responded: Single 64%, Married 31%, Cohabiting 3%, Prefer not to say 2%</p> <p>MSG Youth (635) – of the 71% of beneficiaries that responded: Single 91%, Prefer not to say 9%</p> <p>MSG Lifelong Learning &amp; Sport (927) – of the 62% of beneficiaries that responded: Married 39%, Prefer not to say 33%, Single 20%, Cohabiting 8%, Civil Partnership 1%</p> <p>MSG Lunch Club (2,189) – of the 30% of beneficiaries that responded: Prefer not to say 50%, Married 25%, Single 25%</p> <p>MSG Prevention Health &amp; Wellbeing (908) – of the 71% of beneficiaries that</p>

			responded: Married 33%, Prefer not to say 33%, Single 29%, Cohabiting 4%, Civil Partnership 1%
	Positive	Theme 2- Digital Inclusion	<p>Although Digital Inclusion was a cross-cutting theme in the MSG 2015-18 programme there was not a specific Theme / Strand</p> <p>There is limited information relating to this protected characteristic and digital inclusion in Tower Hamlets however the recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers in accessing digital platforms, information about online safety and ICT skills and digital careers in Tower Hamlets as outlined above and will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding</p>
	Positive	Theme 3- Advice & Information	<p>There is limited information available in relation to this protected characteristic and advice and information services in Tower Hamlets. In addition, the monitoring information for the MSG Programmes have reported the following about the MSG Programme service users - MSG Social Welfare Advice Services (5,860) – of the 79% of beneficiaries that responded: Married 41%, Single 41%, Prefer not to say 11%, Cohabiting 4%, Civil Partnership 3%</p> <p>The recommended LCF projects will provide a comprehensive borough wide service which will include many existing providers with a strong track record of ensuring people with equalities protected characteristics are included in service provision. This will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding. There are two recommended projects under the advice and information theme which will provide free, confidential, independent and quality assured advice services to Tower Hamlets residents to resolve any problems they may face around a range of topic including welfare benefits, housing and money/debt etc. These are –</p> <ul style="list-style-type: none"> <li>• East End Citizens advice Bureaux – Advice Tower Hamlets – Includes consortium of 13 organisations</li> <li>• Island Advice Centre – Tower Hamlets Advice Training and Capacity Building Project</li> </ul>

	Positive	Theme 4- Employment & Skills	<p>There is limited information relating to marriage/civil partnership and employment rates in Tower Hamlets. The monitoring information about beneficiaries of the MSG Projects is set out below:</p> <p>MSG Routeways to Employment (341) – of the 89% of beneficiaries that responded: Single 47%, Married 37%, Prefer not to say 13%, Cohabiting 3%, Civil Partnership 1%</p> <p>MSG Raising Attainment (210) – of the 37% of beneficiaries that responded: Single 100%</p> <p>MSG Community Languages (614) – of the 10% of beneficiaries that responded: Single 64%, Prefer not to say 36%</p> <p>However, the recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers to employment in Tower Hamlets and this protected characteristic will continue to be monitored through ongoing assessment of LCF projects during the lifetime of the funding</p> <p>Within the Employment and Skills theme there are two projects specifically targeting disadvantaged groups who face additional barriers to employment in Tower Hamlets. These are:</p> <ul style="list-style-type: none"> <li>• The Bromley by Bow Centre – Creative Communities</li> </ul> <p>Society Links Tower Hamlets – Job Club</p>
	Positive	Theme 5 – Community Safety	<p>Community Safety was not a Theme in the MSG 2015-18 programme and there is limited data relating to marriage/civil partnerships and community safety in Tower Hamlets</p> <p>However, the recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers to employment in Tower Hamlets and this protected characteristic will continue to be monitored through ongoing assessment of LCF projects during the lifetime of the funding. In particular the Hestia Housing Support project will support victims of domestic violence which may be relevant to this protected characteristic.</p>

Pregnancy and Maternity	Adverse	Theme 1- Inclusion, Health & Wellbeing	<p>It's recognised that one of the most effective interventions for minimising health inequalities is ensuring that every child has a healthy start, with a focus on maternal health and the first 2 years.</p> <p>The infant mortality rate, in infants under 1 year old, in 2014-16 was 5 deaths per 1,000 live births. This was the highest of all London boroughs.</p> <p>4 per cent of mothers were smoking during pregnancy which is lower than the England average of 11 per cent, but this masks differences in levels between mothers of different ethnicities.</p> <ul style="list-style-type: none"> <li>• 4 per cent of mothers were smoking during pregnancy which is lower than the England average of 11 per cent, but this masks differences in levels between mothers of different ethnicities. (BEA 2017)</li> </ul> <p>In the LCF prospectus 'children under 5' include young toddlers and infant and can also cover pregnancy, so the bids may include projects beneficial to this protected characteristic but none of the recommended bids serve this group specifically.</p> <p>No projects have specifically addressed this protected characteristic in their bids. In MSG data, there were particularly high levels of pregnancy and maternity in the vulnerable and excluded project areas (34% described either pregnancy or maternity). The gap around under 5s has been discussed under Age above and needs addressing.</p> <p>From our analysis the proposed change could potentially have an adverse impact on particular groups. Through contract mobilisation we will identify how proposed bidders will ensure those gaps are addressed. Furthermore, through the transition support for the LCF programme we will support existing providers to refer clients to other providers and also provide capacity building support to them.</p>
	Positive	Theme 2- Digital Inclusion	<p>Although Digital Inclusion was a cross-cutting theme in the MSG 2015-18 programme there was not a specific Theme / Strand</p> <p>There is limited information relating to this protected characteristic and digital</p>

			inclusion in Tower Hamlets however the recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers in accessing digital platforms, information about online safety and ICT skills and digital careers in Tower Hamlets as outlined above and will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding.
	Positive	Theme 3- Advice and Information	<p>There is limited information available in relation to this protected characteristic and advice and information services in Tower Hamlets. In addition, the monitoring information for the MSG Programmes have reported the following about the MSG Programme service users - MSG Social Welfare Advice Services (5,860) – of the 23% of beneficiaries that responded: Prefer not to say 100%</p> <p>The recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who share these protected characteristics. The impact of this service on this protected characteristic will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding. There are two recommended projects under the Advice and Information theme, these are:</p> <ul style="list-style-type: none"> <li>• East End Citizens advice Bureaux – Advice Tower Hamlets – Includes consortium of 13 organisations</li> <li>• Island Advice Centre – Tower Hamlets Advice Training and Capacity Building Project</li> </ul>
	Positive	Theme 4- Employment and Skills	<p>There is limited information relating to pregnancy/maternity and employment rates in Tower Hamlets. The monitoring information about beneficiaries of the MSG Projects is set out below:</p> <p>MSG Routeways to Employment (341) – of the 12% of beneficiaries that responded: Prefer not to say 95%, Pregnant 5%</p> <p>MSG Raising Attainment (210) – of the 4% of beneficiaries that responded: Prefer not to say 100%</p> <p>MSG Community Languages (614) – of the 10% of beneficiaries that responded:</p>

			<p>Prefer not to say 100%</p> <p>However, the recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers to employment in Tower Hamlets and this protected characteristic will continue to be monitored through ongoing assessment of LCF projects during the lifetime of the funding</p> <p>Within the Employment and Skills theme there are two projects specifically targeting disadvantaged groups who face additional barriers to employment in Tower Hamlets. These are:</p> <ul style="list-style-type: none"> <li>• The Bromley by Bow Centre – Creative Communities</li> <li>• Society Links Tower Hamlets – Job Club</li> </ul>
	Positive	Theme 5-Community Safety	<p>Community Safety was not a Theme in the MSG 2015-18 programme and there is limited around pregnancy/ maternity and community safety in Tower Hamlets is not available.</p> <p>However, the recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers to employment in Tower Hamlets and this protected characteristic will continue to be monitored through ongoing assessment of LCF projects during the lifetime of the funding</p>
Other Socio-economic Carers	Adverse	Theme 1- Inclusion, Health & Wellbeing	<p>The 2011 Census identified 19,356 residents in the borough who provide unpaid care. Reflecting the significant increase in the borough's population the number of unpaid carers has increased by 15.7 per cent from 16,725 in 2001 to 19,356 in 2011. Stepney Green has the highest proportion of carers, 9.6 per cent of the population and Canary Wharf the lowest, 5.5 per cent.</p> <p>In terms of provision, 56.5 per cent of carers are providing 1 – 19 hours of care per week. Compared to the London and England average Tower Hamlets has a higher proportion of residents providing more than 50 hours (25.4 per cent).</p> <p>Almost 3 per cent of unpaid carers are aged 0 to 15. This is just above averages for the London (2.5 per cent) and England (2.1 per cent).</p>



			<p>Around 56 per cent of those providing care are women and 44 per cent men. This is slightly lower than the national and regional average. In London and England almost 58 per cent of carers are women. Around 66 per cent of those providing more than 50 hours per week are also women.</p> <ul style="list-style-type: none"> <li>• In 2011 7.6 per cent of Tower Hamlets residents provided unpaid care.</li> <li>• The 2011 Census identified 19,356 residents in the borough who provide unpaid care.</li> <li>• There are an estimated 23,000 unpaid carers in the borough, but only a small number are coming forward for help (local account)</li> </ul> <p>A stated priority of scheme 1A is to support young carers. An outcome of scheme 1B is to support carers of people living with dementia. Whilst there is provision in some bids (e.g. Forget me Not) to include adult carers, no bids were recommended in relation to young carers. Since this was a particular priority for the fund and appears to be an area where young people are less well provided for than adults, further work is needed to address this.</p> <p>There are a number of projects recommended within this theme which will support young people, older people, women, disabled residents to live healthy and happy life and thereby enabling them to improve their socio economic wellbeing.</p> <p>From our analysis the proposed change could potentially have an adverse impact on particular groups. Through contract mobilisation we will identify how proposed bidders will ensure those gaps are addressed. Furthermore, through the transition support for the LCF programme we will support existing providers to refer clients to other providers and also provide capacity building support to them.</p>
	Positive	Theme 2-Digital Inclusion	<p>Although Digital Inclusion was a cross-cutting theme in the MSG 2015-18 programme there was not a specific Theme / Strand.</p> <p>The Tower Hamlets Annual Residents Survey 2017 reveals that 92 per cent of residents surveyed had access to the internet. However levels varied for</p>

			<p>households from social grades DE (typically lower income households) had lower levels of internet access compared with 99 per cent of AB households. AB households were four times more likely than DE households to make contact using the council website (32 vs 7 per cent). AB households were also more likely to make contact by email (25 vs 11 per cent).</p> <p>In additional, housing tenure impacted access to the internet in the borough. Those living in social housing had lower levels of access to the internet than private renters or owners occupiers (84 vs 95-99 per cent). Those is social housing were less likely to use and prefer, online methods of contact compared with private renters and owner occupiers – just 1- per cent of social tenants contacting the council had done so via email compared with 24 and 26 per cent of private renters and owner occupiers.</p> <p>The recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers in accessing digital platforms, information about online safety and ICT skills and digital careers in Tower Hamlets as outlined above and will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding. In particular Scheme 2B will look to support activity that raises awareness of potential dangers online among children, young people, and their parents/carers and supports the implementation of suitable prevention measures. Recommended project, by Society Links Tower Hamlets – E-Safety Champions project will train local women to become champions for e-safety in the community. Weekly workshops will cover all areas of online safety and once trained, champions will go into schools and community groups to spread their knowledge to young people and parents/carers through presentations and workshops.</p>
	Positive	Theme 3- Advice and Information	<p>1,262 carers accessed support from adult social care in 2016/17. We know that carers reported a low quality of life as well as impacts on their health and finances</p> <p>This theme has outcomes that are intended to improve across a wide range of socio-economic areas including: improving financial stability; increasing awareness of housing, legal and benefits advice.</p>

			<p>The recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who share these protected characteristics. The impact of this service on this protected characteristic will continue to be monitored as part of the ongoing assessment of LCF projects during the lifetime of the funding. There are two recommended projects under the advice and information theme which will provide free, confidential, independent and quality assured advice services to Tower Hamlets residents to resolve any problems they may face around a range of topic including welfare benefits, housing and money/debt etc. These are –</p> <ul style="list-style-type: none"> <li>• East End Citizens Advice Bureaux – Advice Tower Hamlets – Includes consortium of 13 organisations</li> <li>• Island Advice Centre – Tower Hamlets Advice Training and Capacity Building Project</li> </ul>
	Positive	Theme 4- Employment & Skills	<p>There is limited information relating to other socio-economic carers and employment rates in Tower Hamlets.</p> <p>However, the recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers to employment in Tower Hamlets and this protected characteristic will continue to be monitored through ongoing assessment of LCF projects during the lifetime of the funding. Within the Employment and Skills theme there are projects specifically targeting disadvantaged groups who face additional barriers to employment in Tower Hamlets. These are:</p> <ul style="list-style-type: none"> <li>• Stifford Centre Limited – BME Women Employment Support Programme</li> <li>• St Giles Trust – Choices Tower hamlets</li> <li>• Bromley by Bow Centres – Creative Communities</li> <li>• Four Corners Ltd – ZOOM Film School</li> <li>• Working well Trust – Opening Doors</li> </ul> <p>This project will focus on carers and single parents with limited English language, confidence and secondary education for community learning.</p>

	Positive	Theme 5-Community Safety	<p>Community Safety was not a Theme in the MSG 2015-18 programme and there is limited information relating to socio-economic carers and employment in Tower Hamlets.</p> <p>However, the recommended LCF projects will provide a comprehensive borough wide service that will benefit residents who face barriers to employment in Tower Hamlets and this protected characteristic will continue to be monitored through ongoing assessment of LCF projects during the lifetime of the funding</p>
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### Action Plan – All themes to mitigate impact

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
Manage change in service provision	Support transition from MSG to LCF	<ul style="list-style-type: none"> <li>a. Give as much notice as possible when decisions are made to give organisations the opportunity to adjust to their new funding levels;(Aug/Sept 2019)</li> <li>b. Work with organisations to seek alternative provision for service users where a service is significantly reduced or comes to an end; (Aug-Oct 19)</li> <li>c. Work with funded organisations especially at contract mobilisation to target and promote new services funded under LCF programme; (Aug-Nov 19)</li> </ul>	David Freeman	

		<ul style="list-style-type: none"> <li>d. Support a programme of capacity building to increase organisations' chance of bidding successfully, provided by THCVS, the Council and other providers; (Aug 19- Mar 20)</li> <li>e. Make available, through THCVS and other partners as appropriate, a programme of support available in advance of the end of MSG to help VCS organisations in the transition from MSG to either alternative funding or an orderly change in the level of service; (Aug – Dec 19)</li> <li>f. Continue the VCS Small Grants programme and link to other funders to provide funding opportunities for organisations to meet new and emerging needs and develop new ways of tackling existing needs (ongoing)</li> <li>g. Promote and support Tower Hamlets Spacehive programme to help organisations to access crowdfunding; (ongoing)</li> <li>h. Retain the Emergency Fund to help organisations meet the costs of transition, particularly those directly linked to lower levels of revenue funding; (Aug</li> </ul>		
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		19- Mar 21) i. Develop and launch a new Tower Hamlets funders forum to help identify and promote local funding sources; (Apr 20)		
Support organisations facing significant change and possible cessation of service	Provide transitional support where appropriate for services currently funded through MSG until funding is available from the new Small Grants programme themes identified above for alternative services where a significant equality impact is identified	Transitional arrangements in place (Oct 19)	David Freeman	
Manage transition of community language services	Transitional arrangements	Transitional arrangements in place (Oct 19)  Future strategy emerges from Community Languages review	David Freeman	
Maintain participation and access for BME communities	Address through small grants	Ensure contained within programme (Oct 19) Refer to grants timeline	David Freeman	
Provision for young people's mental health	Commission	Define service (Oct 19) Procure service (Jan 20) Delivery (Apr 20)	David Freeman	
Provision for early years age children or pregnant and new mothers	Commission	Define service (Oct 19) Procure service (Jan 20) Delivery (Apr 20)	David Freeman	
Provision for young carers priority	Extend other provision or identify a potential new provider	Define service (Oct 19) Procure service (Jan 20) Delivery (Apr 20)	David Freeman	
Need to support community led older peoples services, particularly those led by BME communities	Transitional arrangements to ensure adequate support	Transitional arrangements in place (Oct 19) Link to small grants established (Oct 19)	David Freeman	

		Set future strategy as a result of findings of Day care review (tba)		
Need to ensure Geographical Spread	Ensure successful bidders provide a borough wide service in the areas of highest need through regular assessment and development work with projects	Contract mobilisation (Oct 19) Contract monitoring (Ongoing) Reviewing performance after 1 year (Dec 20)	Robert Mee	

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## Local Community Fund Themes, Schemes and Priorities

Theme	Scheme	Priority
Inclusion, Health and Wellbeing	Scheme 1A – Children, Young People and Families	Increase access to Youth Services
		Provision of Early Help support to families
		Support for young carers
	Scheme 1B – Older People	Ageing well and reducing social isolation
		Provision of physical and health-promotion activities for older people
	Scheme 1C – Access, information and self-management	Residents better informed/equipped to manage health conditions
	Scheme 1D - Healthy living and healthy choices	Residents better informed to make healthier choices
		Increased engagement in physical activity
Scheme 1E – Improved inclusion, health and well-being outcomes for disabled people and people experiencing mental health issues	Improved health outcomes for disabled people	
	People suffering with mental health issues are better supported	
Digital Inclusion and Awareness	Scheme 2A – ICT skills and digital careers	Access to ICT support and training for older people
		Digital skill development for children and young people
	Scheme 2B – Online Safety	Children/ young people safety online
Scheme 2C - Improving health and wellbeing facilitated through digital platforms	Improving health and wellbeing facilitated through digital platforms (Increase in self-management/self-reliance/ confidence/ health literacy)	
Advice and Information	Scheme No 3A - Advice and Information	Provision of Social Welfare Advice
Employment and skills	Scheme 4A - Developing and embedding good practice in the work place for people with disabilities, learning difficulties and physical and mental health barriers to work	Promoting ethical employer practices to focus on improving employment and progression opportunities for disadvantaged people, with an emphasis for employers on improving business productivity (includes employment and in-work support for disabled people and people suffering with mental health issues)
		Reducing barriers to employment for disadvantaged groups
	Scheme 4B - Reducing barriers to employment for disadvantaged groups	Employment and volunteering opportunities for older people
		Employment skills for vulnerable young people who are NEET
		Employment and skills for young people at risk of achieving poor outcomes
Scheme 4C - Support focused on increasing access to art and cultural industries	Support focused on increasing access to art and cultural industries	
Community safety	Scheme 5A – Reduction in the exploitation of children, young people and other vulnerable groups	Reduction in the exploitation of children and young people, and vulnerable groups
	Scheme 5B – Improving the perception of young people in the community	Improving the perception of young people in the community
	Scheme 5C – Services for people affected by domestic violence or other unsafe circumstances	Services for people affected by domestic violence

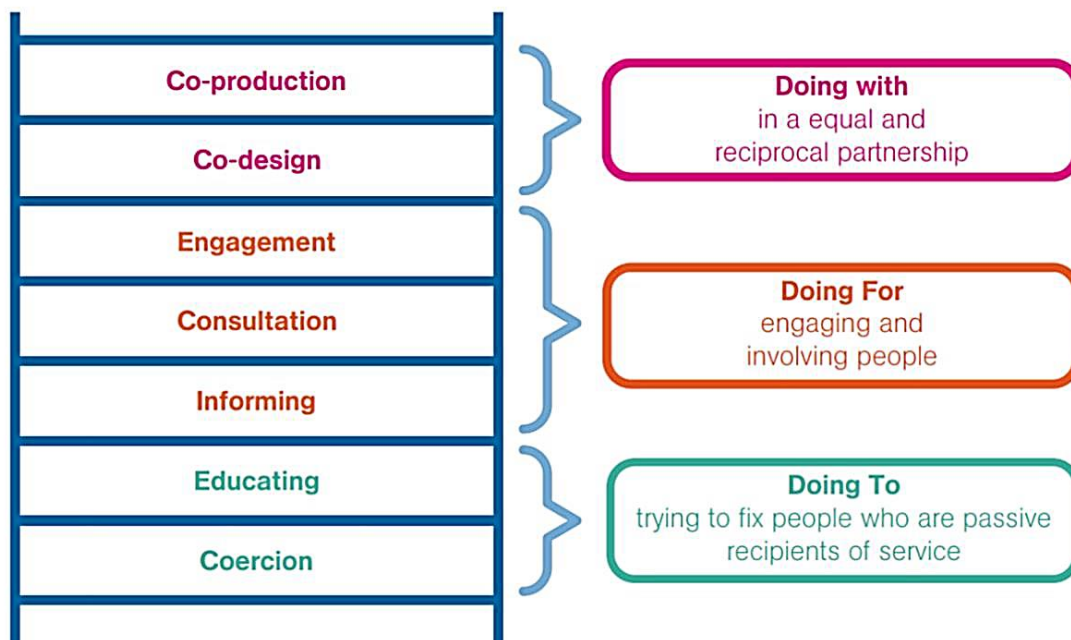
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## Co-Production and Consultation

### Developing the Programme

A range of local stakeholders, including staff, trustees, volunteers and service users of voluntary and community sector organisations, council and NHS colleagues and local residents were invited to take part in a programme of co-design for the new Local Community Fund, starting in January 2018.

As outlined in the council’s coproduction framework, co-design involves working with stakeholders to develop ideas together.



Whilst it wouldn't be accurate to say that the programme was co-designed, we have utilised co-design principles throughout the development phase. The main stages of this work are summarised below:

#### Phase 1 – Framework and Priorities, Spring 2018

The priorities and overarching framework for what was then the ‘Community Commissioning’ programme were developed in a series of events co-facilitated by Carney Green and the New Economics Foundation. In addition to a number of internal workshops, 6 public events were held:

- Community Commissioning: Shaping the Framework. Two workshops looking at priorities, needs and target groups, attended by 77 voluntary sector contacts and 20+ council staff
- Community Commissioning 'You said, we did' workshop to assess the emerging priorities - 44 attendees
- Presentation of headline outcomes, 12<sup>th</sup> March - 50 attendees
- Theory of Change 27<sup>th</sup> March - 49 attendees
- Theory of Change, 16 April - 52 attendees

This phase had 272 total attendances, many of which were organisations attending multiple sessions.

## **Phase 2 – Outcomes Development, Winter 2018/19**

One of the clear messages from the first phase of co-design was that many voluntary and community sector organisations were uncomfortable with the shift from grants to commissioning and concerned that the tendering process would be difficult for smaller organisations to navigate successfully. Concern was also expressed that external organisations with limited knowledge or networks in Tower Hamlets might be more likely to bid at the expense of community-led provision.

Following these discussions, development of Community Commissioning was paused and the Mainstream Grant programme extended to allow more time to develop the new programme. At the end of 2018 the council re-started work on the new Local Community Fund, running six thematic workshops to develop some headline outcomes.

### **Outcomes workshops:**

- Inclusion Health and Wellbeing, 23<sup>rd</sup> November and 10<sup>th</sup> December – 72 attendees
- Digital Inclusion, 14<sup>th</sup> November -17 attendees
- Advice, 26<sup>th</sup> November – 40 attendees
- Employment and Skills, 30<sup>th</sup> November – 40 attendees
- Community Safety, 12<sup>th</sup> December – 15 attendees
- Drop in, 18<sup>th</sup> December – 8 attendees

Each workshop started with the priorities agreed by Cabinet after phase 1 and asked participants to come up with more detailed sub-outcomes and ideas for potential activities. Participants were also asked for questions and comments about the themes and schemes as a whole and about the LCF process, all of which helped to inform the development of the programme.

All of the workshops led to changes that helped to broaden and clarify the final LCF specifications. In some there was broad agreement with the overarching priorities and principles but the group wanted to clarify the language and add more detail. For example, in the two workshops for the Inclusion Health and Wellbeing theme, the groups wanted to reframe the negatively focussed outcome of *'fewer older people feel lonely, less often'* so turned it into *'older people have more opportunities to socialise and interact with others'*. Further comments in these workshops stressed importance of intergenerational work, further refining the outcomes to the final published version of outcome 3 under Scheme B: *'Older people feel more included and integrated in their communities and are able to mix with people of different ages and from different backgrounds to increase the sharing of skills, experience and knowledge both amongst older people, and between different generations'*

The Digital Inclusion theme changed to acknowledge the concerns and needs of different populations in Tower Hamlets. Discussions started out with separate high level priorities covering access to ICT support and training for older people, children and young people's safety online and digital skills development for children and young people, but the group questioned the way these headline outcomes were each focussed on particular age groups. Participants pointed out that young people learn about ICT, including coding, in school, whereas working age adults, particularly those with limited English and those who are disabled and/or older, might not have had access to the same learning and are at risk of being digitally excluded. Similarly, the group agreed that online safety is not just a concern for children and young people, and may be part of the reason that older people are reticent to go online or participate in ICT training.

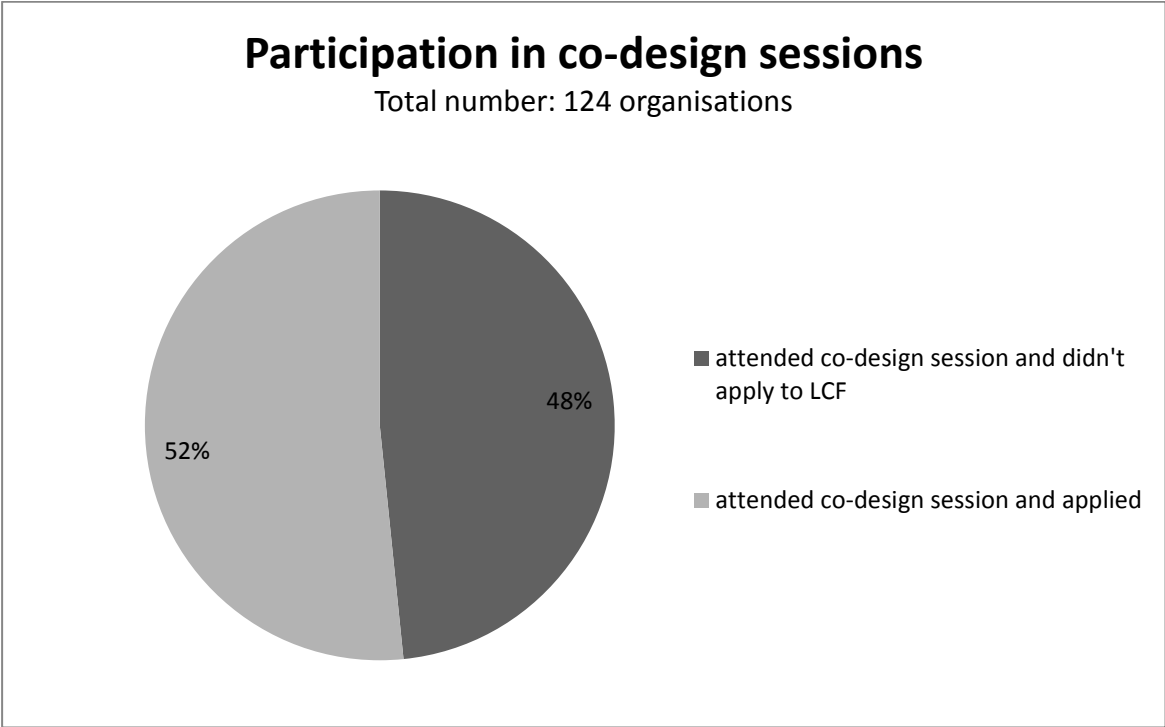
The revised versions of these schemes therefore became 2B, Online Safety, with the outcomes focused on residents as a whole, older people, and younger people and their families, and 1B, ICT Skills and Digital Careers, with outcomes focussed on 'working age residents' and 'residents with limited digital/ICT skills, particularly older residents, disabled residents, those with English as a second language or other barriers to digital inclusion.'

Following the redrafting and circulation of the updated outcomes, the council then ran a summary workshop to re-look at the draft schemes outcomes a final time. The programme concluded with a prospectus workshop, where colleagues from the voluntary sector gave input give input on the assessment criteria for the LCF and the weighting applied to the different sections of the application process.

- Outcomes Workshop, 21<sup>st</sup> Jan - 48
- Prospectus workshop, 6<sup>th</sup> February – 80

124 organisations came to these events a total of 320 times between them, with a number of groups attending a range of sessions to help develop meaningful outcomes for the programme.

One concern raised in the development of the co-design programme was that organisations might only attend the sessions if they intended to apply for the funding, limiting the range of ideas and suggestions and potentially steering the discussion to suit the interests of those present, rather than what might be needed by the wider borough. Analysis of attendance shows that this wasn't the case, however; nearly half of the co-design participants did not apply to the Local Community Fund; the inference being that a large proportion of attendees helped to shape the programme without intending to receive funding from it

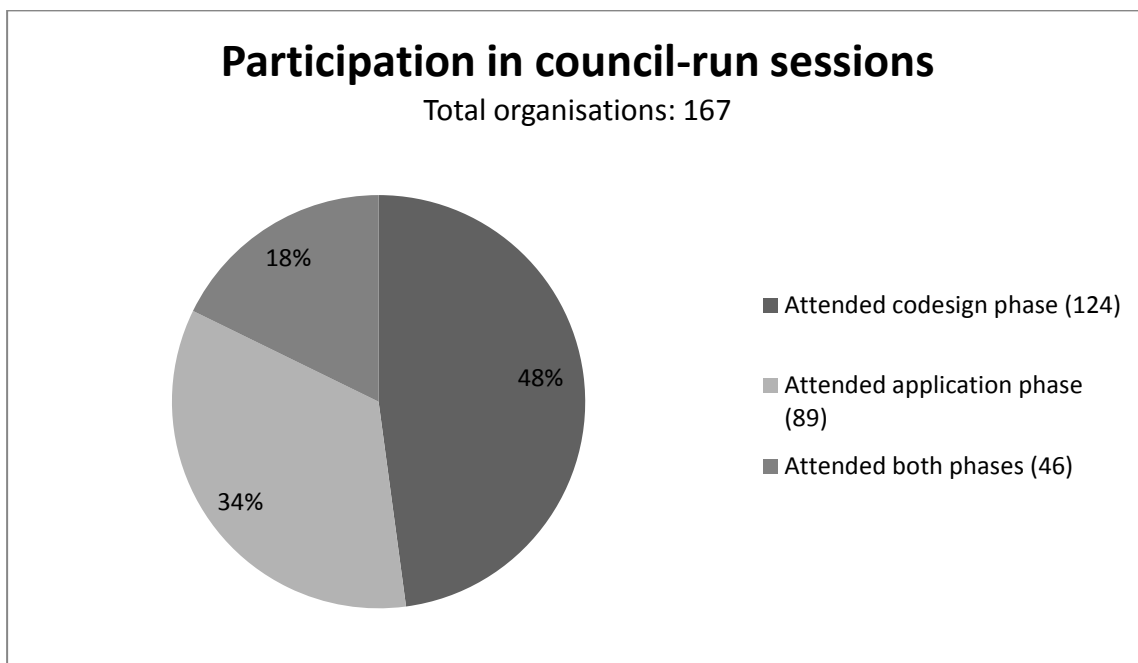


## Training and Support

After the Local Community Fund had opened for applications, two parallel programmes were run by the council and THCVS. The council ran a series of application workshops explaining how to access the online application portal and taking potential applicants through the organisational and project forms. These sessions were all run at the PDC in Bethnal Green and took place in the first half of the 8 week application process:

- 3<sup>rd</sup> April – 38 attendees
- 9<sup>th</sup> April – 20 attendees
- 13<sup>th</sup> April (Sat) – 11 attendees
- 18<sup>th</sup> April – 27 - attendees
- 25<sup>th</sup> April (evening) – 16 attendees

The application workshops saw 112 attendances overall from at least 89 individual organisations, bringing the total number of organisations attending council-run LCF training and support sessions, including the briefing sessions prior to the launch of the programme, to 167

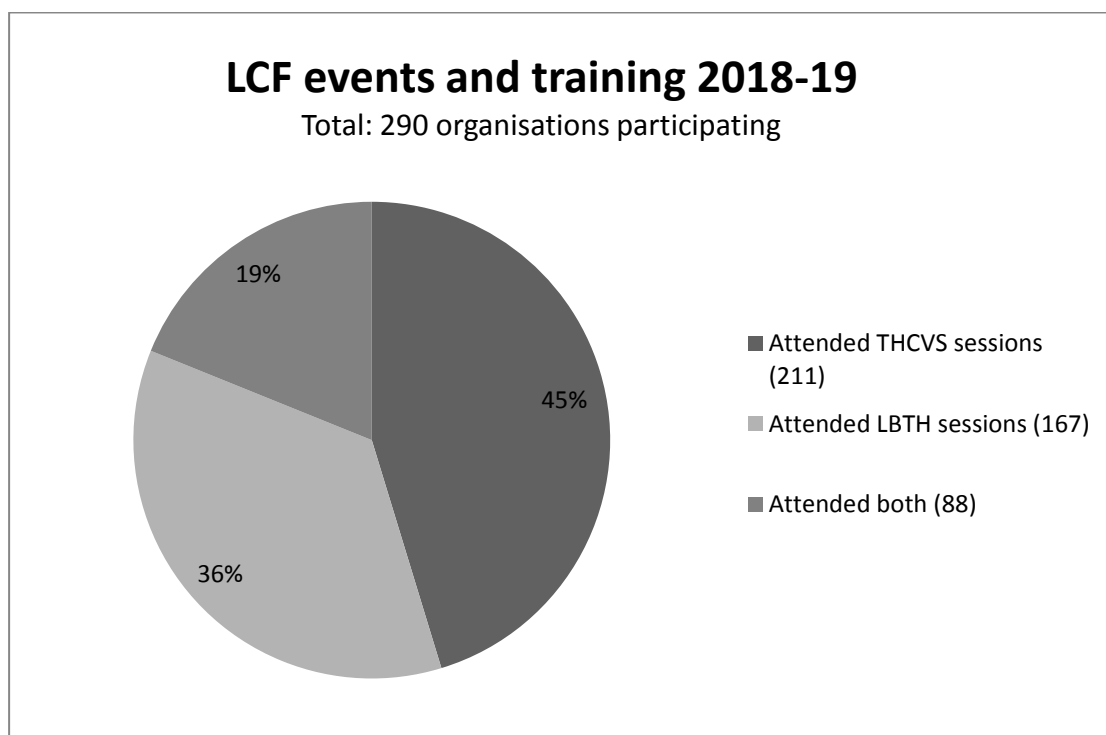


THCVS also ran a programme of events, training and one to one support for organisations applying to the Local Community Fund. They sent weekly LCF bulletins to their mailing list during the LCF bidding process and provided useful resources including a template business plan and a word version of online application form. THCVS sessions focussed on the Local Community Fund and offered options for those deciding not to apply, particularly those currently in receipt of Mainstream Grant. Key events were:

- Digital Inclusion Networking Event, 23<sup>rd</sup> January – 32 attendees
- Employment and Skills Networking Event, 13<sup>th</sup> February – 41 attendees
- Training Employment and Enterprise Forum, 14<sup>th</sup> March – 11 attendees
- Health and Wellbeing Forum, 20<sup>th</sup> March - 25 attendees
- Meet the Funders event, 26<sup>th</sup> March – 167 attendees
- Partnerships Speed Dating: Health and Wellbeing, 10<sup>th</sup> April – 28 attendees
- Bid Writing Top Tips, 11<sup>th</sup> April – 21 attendees
- Speed dating: Digital, 24<sup>th</sup> April – 22 attendees
- Finance and Budgeting for LCF, 25<sup>th</sup> April – 19 attendees
- Bid Writing workshop, 29<sup>th</sup> April – 32 attendees
- Co-production training, 2<sup>nd</sup> May – 34 attendees
- Bid Writing for LCF, 8<sup>th</sup> May – 14 attendees
- Finance and Budgeting for LCF, 9<sup>th</sup> May – 15 attendees

THCVS also provided one to one support by phone, over email and in person, working with individuals and small groups of applicants to help them develop their bids. They undertook outreach to current holders of council MSG funding, targeting the smaller groups and offering support to apply. Their bid checkers reviewed and gave feedback on a total of 26 bids from 21 organisations.

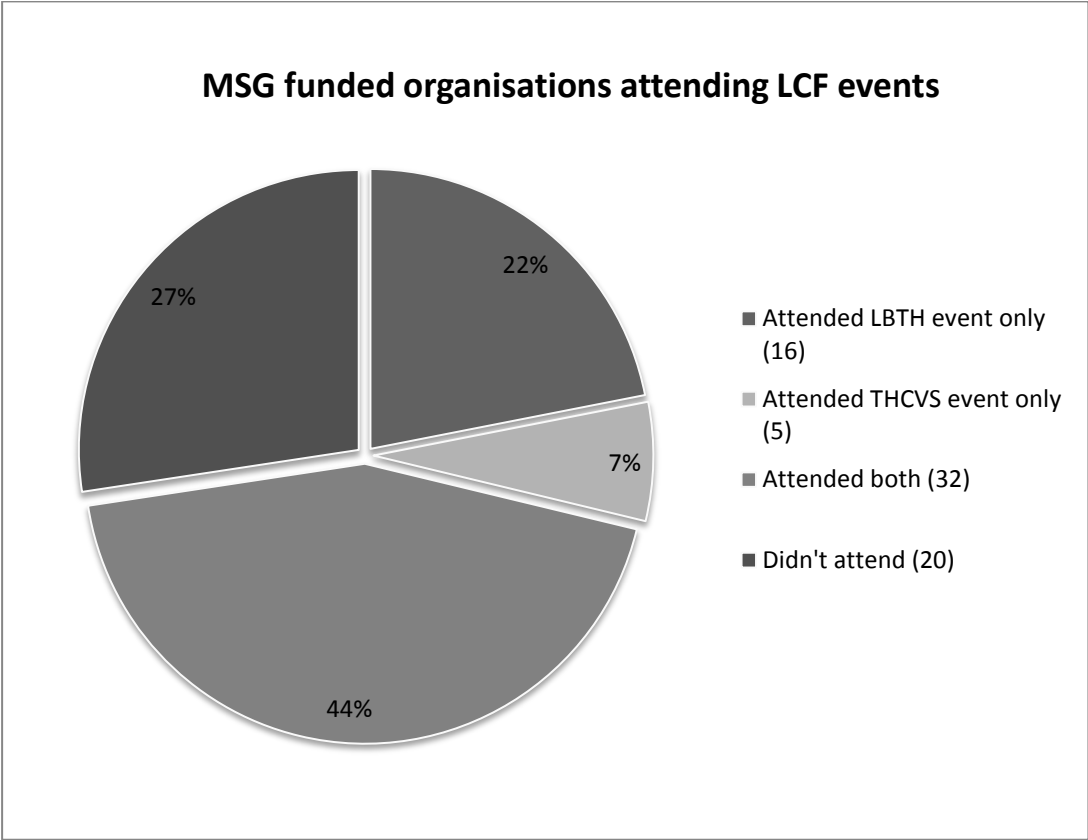
Over the course of phases 2 and 3 the LCF training programme reached 291 organisations:





**Currently funded organisations accessing support**

In terms of support for currently funded groups whose funding will be coming to an end in September 2019, of the 71 organisations listed as main grant holders under the MSG programme just under three quarters at least one event by either THCVS, the council, or both.

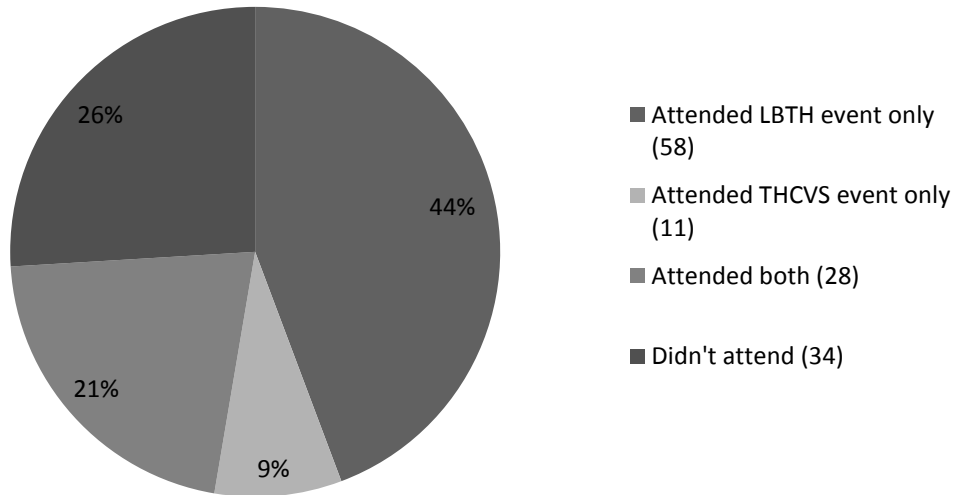


These headline figures only represent the main grantholders rather than partners in MSG funded projects, and only cover the main programme of public events. In addition, THCVS reports 77 instances of MSG funded organisations attending one to one sessions, phone advice, email support, bid checking and business planning support.

**Applicant organisations accessing support**

When the list of organisations accessing events and training is mapped against the list of organisations that submitted LCF applications received, it is clear that nearly three quarters of applicants came to application events.

## LCF applicants attending training and events



## Local Community Fund Assessment Criteria

### General

The assessment criteria are split into two sections, organisational criteria which relate to your organisation, its governance and management, and project criteria which relate to the activities you are seeking funding for.

The document 'Assessment Criteria' sets out the funding criteria, summarises the evidence we are looking for, states whether the assessment will be based on documents you submit or specific questions on the Local Community Fund forms, and shows what percentage of the score for each section is allocated to each of the criteria.

The organisational criteria are assessed first. If you do not score at least 50% and pass the essential pass/fail questions, none of your projects will go forward to the next stage of assessment.

### Organisational Criteria

All bids must meet the basic organisational criteria set out below at a level which is appropriate to their size. We do not expect small organisations to have sophisticated documentation or processes. However, you will need to be able to show that you have thought about all of the criteria and have something in place which is reasonable for your size and income.

For the purposes of the organisational criteria we are defining size by annual income (by which we normally mean as set out in your last approved accounts), as follows:

- Large           over £250,000
- Medium        over £25,000 up to and including £250,000
- Small           up to and including £25,000

New organisations should use their anticipated annual income, including the total LCF applied for.

Some organisational criteria are scored '**Pass/Fail**'. Those in bold are essential and your bid will not go forward if the assessment is 'Fail' on 'Governance', 'Financial Management' or 'Equalities'.

Some organisational criteria are scored with the maximum number of available marks indicated in the 'Max Score' column. The total is 90 overall. Your assessment

needs to score more than 45/90 for your bids to go forward to the second stage to assessment.

If you fail in the organisational criteria assessment on 'Managing People', 'Safeguarding' or 'Insurance' your bid may still be assessed. However, if your organisation is offered funding it will have to reach the pass standard on all three before any funding contracts can be signed.

Criteria	Evidence	Assessed by	Scoring guidance	Max Score
How you are governed and led	You must have a constitution or other governing document to demonstrate that your organisation is properly established and not for profit.	Submit document	Constitution or other governing document with details of, <ol style="list-style-type: none"> <li>1. Membership,</li> <li>2. Committee structure</li> <li>3. Not for profit</li> <li>4. Dissolution clause</li> </ol>	<b>Pass/ Fail</b>
	You will also need to be able to show that: <ol style="list-style-type: none"> <li>1. You have a committee which meets regularly;</li> <li>2. When you had your last annual general meeting, and</li> <li>3. If you are a larger organisation, whether you have sub committees to deal with particular areas such as finance or personnel.</li> </ol>	Questions	Regular management committee meetings  List of management committee/Board members (this may be included in annual report and/or accounts)  AGM date within past two years  Sub Committees (large only)	
Business planning	Do you have a business plan or strategic plan for your organisation or can you show that you can develop a plan if asked?  It does not need to be very sophisticated if you are a small organisation, but enough to show you have thought about and planned how you will provide your services.	Submit documents	<b>MET (40)</b>  Large organisation – full three to five year plan which includes: <ul style="list-style-type: none"> <li>• Organisational purpose, aims &amp; objectives;</li> <li>• Client need;</li> <li>• Strategic context, i.e policy environment, issues affecting clients, how needs may change over time (could be PEST</li> </ul>	40

Criteria	Evidence	Assessed by	Scoring guidance	Max Score
			<p>analysis)</p> <ul style="list-style-type: none"> <li>• Assessment of organisational capacity (i. SWOT analysis)</li> <li>• Plans for next 3-5 years (yr 1 in detail)</li> <li>• Resources required to fulfil plans</li> <li>• Risk assessment and contingency planning</li> </ul> <p>Medium or small organisation – a document which demonstrates the organisation has considered the seven key issues in detail. Level of detail will be proportionate to the size of the organisation.</p> <p><b>PART (20)</b></p> <p>Large organisations – Business plan which covers</p> <ul style="list-style-type: none"> <li>a) some but not all of the key issues, or</li> <li>b) all the issues but not in detail</li> </ul> <p>Medium and small organisations – Document which demonstrates the organisation has considered</p> <ul style="list-style-type: none"> <li>a) some but not all of the key issues, or</li> <li>b) all the issues but not in detail</li> </ul> <p><b>FAIL (0)</b></p> <p>Large Organisations – no business plan or business plan which does not cover any or</p>	

Criteria	Evidence	Assessed by	Scoring guidance	Max Score
			<p>only one of the key issues.</p> <p>Medium and small organisations – no indication that the organisation has considered any or only one of the key issues.</p>	
Managing the organisation	You must be able to show that you have processes in place to deliver services effectively and that your organisation's resources are managed efficiently.	Questions and submit documents	<p><b>MET (40)</b></p> <p>'Yes' to</p> <ol style="list-style-type: none"> <li>1. written procedures proportionate to the size of the organisation, and</li> </ol> <p>either</p> <ol style="list-style-type: none"> <li>2. recognised quality mark, or</li> <li>3. clear description of how organisation manages quality</li> </ol> <p><b>PART (20)</b></p> <p>'Yes' to one of the three questions</p> <p><b>FAIL (0)</b></p> <p>'No' to all</p> <p><b>NB</b> Quality marks should be relevant to the service. National quality marks from umbrella bodies are acceptable if national body is recognised regulatory body, eg. Advice Services Alliance, Sport England, NCVO</p> <p>Policies and procedures should comply with current legislation and should be dated and regularly reviewed</p> <p>Essential policies and procedures are set out in the</p>	40

Criteria	Evidence	Assessed by	Scoring guidance	Max Score
			funding agreement and must be in place before the agreement is signed.	
Managing people	<p>If you employ staff, your management must include:</p> <ol style="list-style-type: none"> <li>1. An effective and fair way of recruiting staff using a job description and person specification;</li> <li>2. Written contracts of employment, which meet legal requirements;</li> <li>3. Clear written discipline and grievance procedures in line with ACAS codes of practice; and</li> <li>4. Adequate training for the duties they have to perform.</li> </ol> <p>If you work with volunteers, your management should include:</p> <ol style="list-style-type: none"> <li>1. A recruitment process to ensure volunteers are appropriately placed;</li> <li>2. A clear description of volunteers' roles, and</li> <li>3. Adequate training for the duties they have to perform.</li> <li>4. Clear procedures for reimbursing volunteer expenses</li> </ol>	Questions and submit documents	<p><b>MET</b> All YES</p> <p><b>FAIL</b> Any NO</p>	Pass/ Fail
Financial management and viability	<ol style="list-style-type: none"> <li>1. You must keep to all financial and accounting requirements of charity and company law, if appropriate.</li> <li>2. You must follow good practice in relation to the business' financial controls.</li> <li>3. You must be able to provide accounts appropriate to the size of your organisation.</li> </ol>	Questions  Submit document	<p><b>MET</b></p> <ol style="list-style-type: none"> <li>1. Accounts meet charity commission or other regulator's standards</li> <li>2. Yes to 50%+ questions on 'Finances'</li> <li>3. Balanced income and expenditure budget for the organisation</li> <li>4. Latest annual accounts show that the organisation does not have</li> </ol>	Pass/ Fail

Criteria	Evidence	Assessed by	Scoring guidance	Max Score
			<p>creditors/debts which appear unserviceable over the coming year(s) given their average income of unrestricted or designated funds.</p> <p>5. The organisation is able to demonstrate income from a diversity of funding sources</p> <p>6. The organisation has a clear reserves policy which is appropriate for its size.</p> <p><b>NB</b></p> <p>New organisations will not have accounts. Assessment should therefore exclude reference to accounts but include all other points.</p>	
<p>Equality and Diversity</p>	<p>You must have an equal opportunities or equalities and diversity policy and be able to show that you actively use it.</p> <ul style="list-style-type: none"> <li>• In recruitment (to board and team)</li> <li>• In planning and provision of services</li> <li>• In the management of your organisation</li> </ul>	<p>Submit document</p>	<p>All organisations must have an equal opportunities or equalities and diversity statement or policy in place which addresses at least two of the three criteria.</p> <p>Adequacy of policy will be assessed at contract mobilisation stage if bid is successful and funding will only be paid when adequate policy is in place or agreed action plan to revise policy.</p>	<p><b>Pass/ Fail</b></p>
<p>Safeguarding children and adults at risk of abuse</p>	<p>Do you have policies on protecting children and adults at risk of abuse which are appropriate to the service? Are your staff and volunteers appropriately trained?</p>	<p>Submit document</p>	<p>All organisations must have safeguarding policies and procedures in place appropriate to their activities.</p> <p>Adequacy of policies and procedures will be assessed at contract mobilisation stage if bids successful and funding will only be paid when</p>	<p>Pass/ Fail</p>



Criteria	Evidence	Assessed by	Scoring guidance	Max Score
			adequate policies in place.	
Insurance	<p>You must be able to show that your organisation has enough insurance cover for your activities, events, staff, premises, equipment and vehicles, including:</p> <ol style="list-style-type: none"> <li>1. Public liability (£5m);</li> <li>2. Employer's liability cover if you employ staff (£10m);</li> <li>3. Property and equipment insurance against fire, theft, loss and damage;</li> <li>4. Vehicle and driver insurance if vehicles are owned or driven; and</li> <li>5. Professional indemnity if you give advice to members of the public.</li> </ol>	Submit document	<p>Documents should be current and for appropriate amounts.</p> <p>Not all insurance will be required for all activities.</p> <p>New organisations will not have insurance in place but must demonstrate that they have adequate cover in mobilisation phase.</p>	Pass/ Fail
Other resources	Will our support help you to get other resources such as volunteers or funding from other sources?	Question	<p><b>MET (10)</b></p> <p>YES plus evidence of other funding/resources from accounts/annual report</p> <p><b>PART (5)</b></p> <p>YES with little evidence</p> <p><b>FAIL (0)</b></p> <p>NO</p>	10

## Project Criteria

This section sets out the criteria we will use to assess your project proposals. We will assess your project proposals proportionate to the size of your organisation. If you are a small organisation, you will not have to provide as much evidence as larger organisations, but you must be able to show that you understand, and are working towards meeting, each of the criteria.

The council will not consider funding any project which scores less than half the available score in any section.

Scoring is on a sliding scale from 'excellent' to 'fail' graduated from five to zero. The scores will then be 'weighted' according to the maximum score for the section. For example, the 'five to zero' score for 'Outcomes' would be weighted x3 to achieve a score out of a maximum of 15 for the section.

Some funding schemes have specific requirements such as advice quality standards, registration with a regulatory body and food hygiene standards. Evidence of these must be submitted with project forms. The council will not fund activities which require these if organisations do not provide evidence.

Criteria	Evidence	Assessed	Scoring Guidance	Max Score
Ability to deliver	<p>Your bid must show that the arrangements you are proposing can deliver the service effectively. You will need to provide:</p> <ul style="list-style-type: none"> <li>• A description of the project, including: <ul style="list-style-type: none"> <li>○ What the activities/services are;</li> <li>○ Plans for delivery – where, how, how frequently, numbers of beneficiaries (these may be used to set your key performance indicators (KPIs) if your bid is successful);</li> <li>○ How you will reach your target beneficiaries;</li> <li>○ Geographic area targeted;</li> </ul> </li> <li>• Details of any partnership arrangements. These may be</li> </ul>	Question	<p>Project description (10 points max)</p> <ul style="list-style-type: none"> <li>• Clear description of activities</li> <li>• Geographical area and rationale</li> <li>• Target residents and rationale</li> <li>• Delivery plan clarifying when, where and how activities/services will be provided</li> <li>• Clear proposals for KPIs that the project will deliver (may be set out in outcomes section)</li> </ul> <p>Partnership arrangements (5</p>	25

Criteria	Evidence	Assessed	Scoring Guidance	Max Score
	<p>informal links to other services or more formal consortium arrangements;</p> <ul style="list-style-type: none"> <li>• Details of why you think your project is needed such as local research and user feedback</li> <li>• Details of how your proposal will help achieve the service priority set out in the prospectus</li> <li>• Evidence that appropriate standards, check and training will be in place (e.g food hygiene, DBS checks)</li> </ul>		<p>points max)</p> <ul style="list-style-type: none"> <li>• If there is a formal partnership or consortium, a clear outline of who will deliver the project (including details of partnership working if appropriate)</li> <li>• Evidence of informal partnership links</li> <li>• Added value of partnership arrangements articulated</li> </ul> <p>NB Theme 3 – Advice and Information will be scored up to 10 in this section as set out in Scheme 3a, making the maximum score for this scheme 105.</p> <p>Demonstration of need (5 points max)</p> <ul style="list-style-type: none"> <li>• Local research/user feedback</li> <li>• Local published data (Census, JSNA etc)</li> <li>• National data</li> </ul> <p>Link to LCF priority (5 points max)</p> <ul style="list-style-type: none"> <li>• Clear link between activity and priority</li> </ul>	
Track record	You must be able to show that your organisation has a track record of delivering service effectively in the type of service you want us to fund. If your organisation is new, you must be able to show that the individuals involved in it have a successful track record in other	Question	<p>Experience (with examples as evidence) should include:</p> <ul style="list-style-type: none"> <li>• Delivering projects similar to proposal <ul style="list-style-type: none"> <li>○ Activity</li> <li>○ Complexity</li> <li>○ Size, and</li> </ul> </li> </ul>	5

Criteria	Evidence	Assessed	Scoring Guidance	Max Score
	organisations		<ul style="list-style-type: none"> <li>○ Value</li> <li>● Meeting monitoring and reporting requirements</li> <li>● Achievement of outcomes or evidence of impact of previous work</li> </ul>	
Service Co-design	<p>How will your proposal include further co-design with residents? We expect organisations to work with residents and other stakeholders towards improving the service over the period of funding. This may include revising the outcomes to be achieved and changing the way the service is delivered.</p> <p>You will need to describe how you will engage with residents and other stakeholders to co-design improvements to your service. (See additional guidance)</p>	Question	<p>Plan should include a process for meaningful engagement of residents and other stakeholders in service improvement through:</p> <ul style="list-style-type: none"> <li>● User involvement including feedback, focus groups etc</li> <li>● Working with non-users and partners</li> <li>● Needs and trends analysis</li> </ul> <p>which make reference to basic principles of co-design:</p> <ul style="list-style-type: none"> <li>● Inclusion</li> <li>● Respect</li> <li>● Participation</li> <li>● Outcomes focus</li> </ul>	10
Quality assurance	You must show that you have achieved a recognised quality assurance standard or some other evidence which shows your organisation actively tries to improve quality.	Question	<p>Appropriate QA accreditation must be in place for 'excellent' score with evidence of action to maintain standards.</p> <p>If no QA accreditation in place, must show evidence of working towards QA and/or evidence that a quality standard framework or appropriate processes are in place.</p>	10
Equalities and Diversity	You will need to be able to show how your service promotes equalities and how it affects people who have protected equalities characteristics.	Question	<p>Evidence of consultation with people with protected equalities characteristics</p> <p>Proposals to minimise barriers</p>	5

Criteria	Evidence	Assessed	Scoring Guidance	Max Score
	If your project is specifically targeting people with one or more protected equalities characteristics, you should explain why there is a particular need to do this.		to potential users of services.  Proposals to monitor equalities impact  If appropriate, sufficient information to justify or explain why the project will be targeting specific groups/sections of the local community	
Community cohesion and reducing poverty	How will your project contribute towards community cohesion and reducing poverty?  You will need to show how your proposed service will help people from different backgrounds get on well together in the local area and meet some or all of the <a href="#">borough's community cohesion outcomes</a>	Question	At least one outcome which links to the borough's community cohesion outcomes  Clear evidence that proposal will help reduce poverty in target groups	5
Value for money	How do you know that the service you are proposing offers good value for money? Have you compared it with other, similar services? Does your service bring something extra which other services would not be able to provide?	Question	<ul style="list-style-type: none"> <li>• Realistic costs <ul style="list-style-type: none"> <li>○ Adequate funding for proposed activity</li> <li>○ All project staff paid at least London Living Wage</li> <li>○ Cost comparisons</li> </ul> </li> <li>• Clear explanation of the basis on which costs have been assessed</li> <li>• Leverage of other resources such as volunteers and in kind support</li> </ul>	10
Local value	How will your proposal demonstrate local value? You will need to demonstrate your ability to reach residents and communities in Tower Hamlets and that you have:  a) Good knowledge of the neighbourhoods, needs and	Question	Evidence of local knowledge through: <ul style="list-style-type: none"> <li>• Local presence</li> <li>• Track record of local delivery</li> <li>• Impact locally (outcomes of previous</li> </ul>	15

Criteria	Evidence	Assessed	Scoring Guidance	Max Score
	<p>services where you work (or are planning to work);</p> <p>b) Working links and connections with other organisations (from all sectors);</p> <p>c) Plans to utilise and deepen your local connections over the course of an LCF project, and</p> <p>d) Current or potential partnership arrangements.</p>		<p>work)</p> <ul style="list-style-type: none"> <li>• User feedback</li> <li>• Local research of needs</li> </ul> <p>Evidence of local connection through:</p> <ul style="list-style-type: none"> <li>• Partnerships with local organisations (VCS or public)</li> <li>• Engagement with local structures such as appropriate forum or network membership</li> <li>• Links with other providers such as referrals or joint activity</li> </ul>	
Outcomes	There must be evidence in your bid that you will be able to demonstrate change using outcomes and indicators which are SMART – specific, measurable, achievable, realistic and time-related.	Question	<p>Outcomes must be:</p> <ul style="list-style-type: none"> <li>• Relevant to the specification</li> <li>• Achievable from the proposed activities</li> <li>• Have relevant indicators and measures</li> <li>• SMART</li> </ul>	15

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## Theme 1 - Scheme A: Children, Young People and Families

ID	Organization	Project Title	Main Priority	Short Project Description	Geographic Area Served	Recommend (Annual amount)	Recommend (Total 42 months)
8422	Canaan Project	Canaan Project - Isle of Dogs	Increase access to Youth Services	Canaan Project provides activities for young women aged 11-19 on the Isle of Dogs. Working with George Green's school and Café Forever we offer activities including cooking, craft, sports, and inspirational workshops at our weekly lunch and after school clubs as well as opportunities to join us for regular trips.	Island Gardens Canary Wharf Blackwall and Cubitt Town	28,810	104,111
8378	Half Moon Young People's Theatre	Professional Theatre and Inclusive Participatory Drama for Young People	Increase access to Youth Services	Professional theatre shows and inclusive participatory drama opportunities in an accessible and welcoming venue. The activity is for children and young people from 0-18 (or 25 for disabled young people) from all backgrounds and abilities from across Tower Hamlets, providing free access support to anyone who needs it.	Borough wide	38,213	133,746
8319	Newark Youth London	Girls in Action	Increase access to Youth Services	Our project aims to increase access to regular youth services by girls and young women so they develop their confidence and lifeskills; make them resilient and enable them to participate in a six month social action project and other learning opportunities so they develop their leadership, communication and organisational skills.	Borough wide Limehouse Shadwell Whitechapel Stepney Green St Dunstan's	20,181	70,634
8310	Osmani Trust	Family Mentoring Project (FMP) ' Early Help	Provision of Early Help support to families	Our project aims to provide through family mentoring a range of Early Help support to children, young people and their families to help them overcome their immediate challenges and meet their needs in order for them to thrive in healthy and safe families.	Borough wide	36,000	126,000
8248	St Hilda's East Community Centre	St. Hilda's Girls Driven Project	Increase access to Youth Services	St. Hilda's Girls Driven Project is an inspirational initiative designed to support, inspire, drive girls and young women to reach their full potential and realise their authentic ambitious life goals. Enhance core skills, confidence, grit, motivation, equality and leadership by building on current and long heritage of successful girls work.	Weavers Bethnal Green	16,464	57,624

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8242	Stifford Centre Limited	Stifford Young Girl's Project	Increase access to Youth Services	The Project will run a Young Girl's Club that will offer disadvantaged young girls a safe space in which they can socialise, participate in a range of activities that encourage their wellbeing, improve confidence and learn skills that are useful for their future development.	St Katherine's and WappingShadwell WhitechapelStepney GreenSt Dunstan's	14,564	50,974
8140	The Yard Theatre Ltd	Tower Hamlets Teens	Increase access to Youth Services	Free, fortnightly youth leadership workshops, weekly drama workshops, summer masterclasses, and schools performances for Tower Hamlets teenagers. Delivered at Tower Hamlets assets, Hub67, The Yard, and local schools, it increases access to youth services, improves participants' health and wellbeing through cultural activities, and supports community cohesion through public events.	Borough wide Bow West Bow East	36,913	129,196
						<b>191,145</b>	<b>672,285</b>

### Theme 1 - Scheme B: Older People

ID	Organization	Project Title	Main Priority	Short Project Description	Geographical Area Served	Recommend (Annual amount)	Recommend (Total 42 months)
8071	Age UK East London	Friend at Home	Ageing well and reducing social isolation	Matching housebound older people who would like a bit more company at home with volunteers who would like to share an enjoyable hour or two of conversation and company with them.	Borough wide	63,105	220,866
8130	Age UK East London	Caxton Hall, a dynamic activity centre led by older people for the whole community.	All in scheme	Caxton Hall is a dynamic activity centre led by older people. Come and enjoy a warm welcome, healthy snacks at our cafe, meet your neighbours and connect to others young and old in your community.	Mile End Bromley South Bromley North Bow West Bow East	73,740	258,090
8420	Community of Refugees from Vietnam - East London	Vietnamese and Chinese Lunch and Social Club	Ageing well and reducing social isolation	The Vietnamese and Chinese Lunch and Social Club project provides healthy lunches and social and health promotion activities for people aged over 50, from the Vietnamese and Chinese community in Tower Hamlets. The Club meets every Monday and Thursday at St. Nicholas Church, Aberfeldy Street in Poplar.	Borough wide	34,728	114,548



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8403	East London Out Project	Tower Hamlets LGBT Support	includes priorities from other schemes in this theme	LGBT Community Support to enhance peer networks, lessen isolation and provide mental health crisis prevention support. Two facilitated social support groups, for older people, people with mental health needs or other disabilities, Individual mental health crisis prevention support provided. LGBT training available to other organisations.	Borough wide	27,618	96,661
8147	St Hilda's East Community Centre	Older People's 'Feeling Good!' Wellbeing Project	All in scheme	'Feeling Good!' wellbeing project is based in Weavers Ward and open to older people from throughout the Borough, Monday-Friday. Providing nutritious lunches, it is more than an ordinary Lunch Club, providing invigorating opportunities from indoor sport, IT learning, singing, art, intergenerational activities with schoolchildren, outings and quizzes, and much more!	Borough wide Weavers	30,000	105,000
8138	Tower Hamlets Friends and Neighbours	Older Peoples Befriending Project	Ageing well and reducing social isolation	THFN will be providing befriending and advocacy services to older people in the borough. Our team of befriender advocates will provide regular one to one support to people in their own homes and assist with making appointments and help in accessing services, as well as organising small group outings locally.	Borough wide	50,000	175,000
8205	Toynbee Hall	The Wellbeing Centre at Toynbee Hall	Provision of physical and health-promotion activities for older people	This project will offer holistic relational support to older people aged 50+ in Tower Hamlets. It aims to make Toynbee Hall's existing provision at our Wellbeing Centre more inclusive and responsive to needs and to build stronger networks of information sharing and peer-support between users and those not accessing services.	Spitalfields and Banglatown	41,414	144,949
						<b>320,605</b>	<b>1,115,114</b>

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## Theme 1 - Scheme C: Access, Information and Self-Management

ID	Organization	Project Title	Main Priority	Short Project Description	Geographical Area Served	Recommend (Annual amount)	Recommend (Total 42 months)
8104	Globe Community Project	Take Back Your Life	Residents better informed/equipped to manage health conditions	A mindfulness-based pain management programme, addressing chronic pain/illness, related social isolation and inactivity. Designed for Tower Hamlets residents with potentially lower language, literacy and income levels and/or from hard to reach groups. Based on the award-winning book: 'Mindfulness for Health' and delivered by experienced, fully accredited Breathworks trainers.	Mile End Bow West Bow East Bethnal Green	28,047	98,165
8289	Real DPO Ltd	Taking control of your life	Residents better informed/equipped to manage health conditions	The "Taking control of your life' project delivers creative support planning support alongside a user-led co-production group harnessing the views of people with lived experience of disability. This project maximises independence, supporting people to make decisions on how they want to fulfil their ambitions and also help 'change the system'.	Borough wide	62,490	218,714
						<b>90,537</b>	<b>316,879</b>

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## Theme 1 - Scheme D: Healthy living and healthy choices

ID	Organization	Project Title	Main Priority	Short Project Description	Geographical Area Served	Recommend (Annual amount)	Recommend (Total 42 months)
8333	London Tigers	Exercise for health: BAME women, children and young people	All in scheme	Exercise for health project delivers a series of sports, physical activities and health-related workshops for women, young people and children to make positive choices about their health and wellbeing. It will provide pathways to stay involved, excel in sports, and develop healthier habits for life.	Blackwall and Cubitt Town Bromley North Whitechapel Stepney Green St Dunstan's Weavers	42,740	149,590

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8322	MUDCHUTE ASSOCIATION	Playing out at Mudchute	Increased engagement in physical activity	We will use Mudchute's unique natural facilities to provide a range of freely chosen play opportunities in a safe, stimulating environment. Enabling children access to participate in freely chosen, innovative leisure and sporting activities will promote; exercise, healthy eating, social and life skills through the process of 'Learning through Play'	Borough wide Canary Wharf	20,000	70,000
8320	Newark Youth London	Healthy-Active-Together (HeAT)	Increased engagement in physical activity	The Healthy-Active-Together (HeAT) project will offer a wide range of sports and physical activities across the borough with the objective of engaging inactive young people (10 to 25) and their families in regular sports and physical activities to improve health and wellbeing, and reduce isolation and exclusion.	Borough wide Limehouse Shadwell Whitechapel Stepney Green St Peter's Bethnal Green	28,114	98,399
8235	STIFFORD CENTRE LIMITED partnership with 1. Stepney City Farm 2. Shadwell Basin Outdoor Activity Centre 3. Bangladesh Youth Movement 4. Wapping Bangladesh Association 5. Dorset Community Association 6. Black Women's Health and Family Support	Healthy Lifestyle Partnership Programme	Increased engagement in physical activity	A free membership health club with over 20 different classes and groups per week brought to you by seven different organisations working together. Build points, beat your personal best and feel your health improve. Health Club is suitable for all ages, and participants will design the activity program alongside providers.	St Katherine's and Wapping Shadwell Whitechapel Stepney Green St Dunstan's Spitalfields and Banglatown Weavers Bethnal Green	80,027	280,095

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8226	The Bangladesh Youth Movement (BYM)	'Live Healthy ' Enjoy Life' [the Female Health & Development Project]	All in scheme	'Live Healthy ' Enjoy Life' will operate from BYM's Women's Centre providing proactive and responsive health development activities which ensure excluded BAMER women develop healthy lives and manage their own physical and mental health ; peer volunteer befriending and development of social networks will alleviate isolation and facilitate inclusion.	Borough wide St Katherine's and Wapping Shadwell Whitechapel Stepney Green St Dunstan's Spitalfields and Banglatown St Peter's	21,542	75,397
8217	The Royal Society for Blind Children	Live Active, Live Well Tower Hamlets	Increased engagement in physical activity	Live Active, Live Well Tower Hamlets will enable 60 blind and partially sighted young people aged 8-25 to gain the confidence and motivation to participate in physical activities and inform their ability to make healthier choices over the next three years.	Borough wide	18,132	63,463
						<b>210,555</b>	<b>736,944</b>

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## Theme 1 - Scheme E: Improved inclusion, health and well-being outcomes for disabled people and people experiencing mental health issues

ID	Organization	Project Title	Main Priority	Short Project Description	Geographical Area Served	Recommend (Annual amount)	Recommend (Total 42 months)
8246	St Hilda's East Community Centre	St. Hilda's Surjamuki Disabled Youth Project	People suffering with mental health issues are better supported	Surjamuki disabled youth project supports young people with learning and physical disabilities across Tower Hamlets, offering a range of educational and recreational opportunities and free wheelchair accessible minibus transport.	Borough wide	12,923	45,231
8365	ICM Foundation CIC	CORE Projects Get Active Newspaper - Promoting Healthy and Active Lifestyles	All in scheme	From October 2019 to March 2023, 20 people with learning disabilities aged 18+ from Tower Hamlets will work in partnership with ICM Foundation. Three times each year we will design and deliver 5000 accessible newspapers, on the theme of health and wellbeing, distributed to communities that reflects the borough's diversity.	Borough wide	13,129	45,952
8186	Woman's Trust	Therapeutic Support Groups for women affected by Domestic Abuse	People suffering with mental health issues are better supported	Our Therapeutic Support Groups provide a safe, moderated space for female survivors of domestic abuse to share experiences and support each other. Groups help women to recover their mental health by reducing isolation, learning from shared experiences, being empowered by supporting others and thereby gaining confidence and independence.	Borough wide	19,279	67,478
8414	deafPLUS	Improving Health and Wellbeing for Deaf and Hard of Hearing people in Tower Hamlets	Improved health outcomes for disabled people	A borough wide health and wellbeing project that will address health inequalities, loneliness and isolation, mental health issues and barriers to employment, lack of confidence and self-esteem by bringing deaf and hard of hearing people together across communities.	Borough wide	45,214	158,249
8151	Working Well Trust	Upskill	People suffering with mental health issues are better supported	Improve the wellbeing of people with lived experience of mental health by supporting them to achieve their goals by accessing new opportunities and including support from their peer, enabling to reconnect with the local community.	Borough wide	108,485	379,698
						<b>199,030</b>	<b>696,608</b>

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## Theme 2 - Scheme A: ICT skills and digital careers

ID	Organization	Project Title	Main Priority	Short Project Description	Geographical Area Served	Recommend (Annual amount)	Recommend (Total 42 months)
8116	Wapping Bangladesh Association	Digital First	Access to ICT support and training for older people	Digital First will engage socially isolated BME older adults aged 55+ but not exclusively living in Wapping and Shadwell, who are not computer literate and are digitally excluded. The Project will deliver ICT and Internet training that will help older adults to cope with facing key life transitions or challenges.	St Katherine's and Wapping Shadwell Whitechapel	4,715	16,503
8344	Limehouse Project	DigiTIES	Access to ICT support and training for older people	The aim of DigiTIES workshops is to prevent digital exclusion in older adults in order to prevent social isolation and increase their ability to access online health related support. The content of the workshop includes how to use social media, managing email accounts, and accessing online health related support services.	Limehouse Lansbury Mile End Stepney Green St Dunstan's	19,999	62,297
8316	Newham New Deal Partnership	@online club network ' Tower Hamlets	Access to ICT support and training for older people	@online club network will build the confidence of older residents (over 50s) to go online using tablet devices, learning in small friendly groups, through taster sessions and eight-week or longer programmes of practical activities based on the needs and interests of participants.	Borough wide	19,520	68,320
						<b>44,234</b>	<b>147,120</b>

## Scheme B: Online Safety

ID	Organization	Project Title	Main Priority	Short Project Description	Geographical Area Served	Recommend (Annual amount)	Recommend (Total 42 months)
8111	SocietyLinks Tower Hamlets	E-Safety Champions	Children/ young people safety online	The E-Safety Champions project will train local women to become 'champions' for e-safety in the community. Weekly workshops will cover all areas of online safety. Once trained, our champions will go into schools and community groups to spread their knowledge to young people and parents/carers through presentations and workshops	Whitechapel	5,798	20,293

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8251	Sporting Foundation	Building Digital Resilience	Children/ young people safety online	Sporting Foundation will build the digital resilience of children and young people and raise the awareness of online safety with parents so that as families they are safe from risk and able to utilise digital resources and managed effectively and reduces harm.	Borough wide	8,803	30,811
						<b>14,601</b>	<b>51,104</b>

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## Theme 3 - Scheme A: Advice and Information

ID	Organization	Project Title	Main Priority	Short Project Description	Geographical Area Served	Recommend (Annual amount)	Recommend (Total 42 months)
8407	East End Citizens Advice Bureaux partnership with 1. Account3 Ltd 2. Age UK East London 3. Bromley By Bow Centre 4. deafPLUS Breakthrough Deaf Hearing Integration 5. Island Advice Centre 6. Legal Advice Centre (University House) 7. Limehouse Project 8. Praxis Community Projects 9. St Hilda's East 10. St Peter's Bengali Association 11. Tower Hamlets Law Centre 12. Toynbee	Advice Tower Hamlets	Provision of Social Welfare Advice	Advice Tower Hamlets provides free, confidential, independent, quality-assured advice services to help Tower Hamlets residents resolve the problems they face, including welfare benefits, housing, money/debt, employment, immigration, consumer, education, community care, family, personal issues. This service is led by Citizens Advice Tower Hamlets, in partnership with twelve local advice agencies.	Borough wide	924,102	3,234,357
8082	Island Advice Centre partnership with THCAN	Tower Hamlets Advice Training and Capacity Building Project	Provision of Social Welfare Advice	The project improves capacity, training, quality and access to the boroughs advice services. We will develop coordination and cooperation between advice and other sectors providing: recruitment and training for volunteers, facilitation of the THCAN network, updated website of advice provision and information / factsheets, coordination of meetings, delivering formal training.	Borough wide	50,000	175,000
						<b>974,102</b>	<b>3,409,357</b>



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## Theme 4 - Scheme A: Developing and embedding good practice in the work place for people with disabilities, learning difficulties and physical and mental health barriers to work

ID	Organization	Project Title	Main Priority	Short Project Description	Geographical Area Served	Recommend (Annual amount)	Recommend (Total 42 months)
8290	Real DPO Ltd partnership with deafPLUS Breakthrough Deaf Hearing Integration Evenbreak Legal Advice Centre (University House) PurpleSpace Ltd	NOW and THEN	Promoting ethical employer practices to focus on improving employment and progression opportunities for disadvantaged people	An holistic package of services, underpinned by coproduction, to support Tower Hamlets companies develop the confidence and capacity to be excellent employers of disabled people, and increase levels of employment amongst them. The project creates communities of current and potential workers, and employers, to drive positive change.	Borough wide	115,923	405,729
						<b>115,923</b>	<b>405,729</b>

## Theme 4 - Scheme B: Reducing barriers to employment for disadvantaged groups

ID	Organization	Project Title	Main Priority	Short Project Description	Geographical Area Served	Recommend (Annual amount)	Recommend (Total 42 months)
8342	Limehouse Project	Developing Potential	Reducing barriers to employment for disadvantaged groups	Developing Potential is an integrated programme of personal skills development designed to enable women to make informed choices on their futures, supporting them into training, volunteering and work. This project will link with the existing provision and act as a progression route forwards new opportunities for women in Tower Hamlets	PoplarLimehouse LansburyMile EndBow WestBow EastWhitechapelS tepnay GreenSt Dunstan'sBethnal Green	50,295	176,033
8171	SocietyLinks Tower Hamlets	Job Club	Reducing barriers to employment for disadvantaged groups	This project will deliver two weekly job club sessions Mondays and Wednesdays 9-12 pm run by our experienced employment support worker. The sessions will include access to computers and tailored employment support with creating a CV, accessing emails, job searching, applications and using Universal Job Match.	Whitechapel	15,296	53,536

## Local Community Fund Recommended Projects

## Appendix F

8240	STIFFORD CENTRE LIMITED	BAME Women's Employment Support Programme	Reducing barriers to employment for disadvantaged groups	This project will run a training programme to help long-term unemployed and economically inactive, isolated and disenfranchised BAME women and improve their job prospects. The focus is on carers and single parents of Bengali, Somali and BAME heritage with limited English language, confidence and secondary education for community learning.	St Katherine's and Wapping Shadwell Whitechapel Stepney Green St Dunstan's Spitalfields and Banglatown Bethnal Green	30,378	106,323
8149	St Giles Trust	Choices Tower Hamlets	Employment skills for vulnerable young people who are NEET	We will support NEET Young people who are facing multiple disadvantages to access education, skills development and employment. The project will deliver credible, consistent and holistic work via individualised one-to-one support, supporting the young person to address and overcome barriers to raise their aspirations and towards reaching their potential.	Borough wide	56,800	198,800
						<b>152,769</b>	<b>534,692</b>

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### Theme 4 - Scheme C: Support focused on increasing access to art and cultural industries

ID	Organization	Project Title	Main Priority	Short Project Description	Geographical Area Served	Recommend (Annual amount)	Recommend (Total 42 months)
8424	The Bromley by Bow Centre	Creative Communities	Support focused on increasing access to art and cultural industries	Our project will equip at least 180 people from under-represented communities to increase their participation and readiness for employment in the creative sector. We will do this through a flexible community-based programme of engagement, needs assessment, practical group work and 1:1s, combining personal and core skills development, with individual support.	Poplar Lansbury Mile End Bromley South Bromley North Bow West Bow East	57,782	202,237
8392	Four Corners Ltd	ZOOM Film School	Support focused on increasing access to art and cultural industries	ZOOM Film School will work with 90 disadvantaged residents 'particularly BAME communities, women and people with disabilities ' to nurture their creative talent, increase confidence and self-esteem, and enable them to acquire the practical skills, experience, and industry knowledge needed to move into work in the creative industries.	Borough wide Spitalfields and Banglatown Weavers St Peter's Bethnal Green	81,373	284,806

## Local Community Fund Recommended Projects

## Appendix F

8357	Auto Italia South East	Learning Live	Support focused on increasing access to art and cultural industries	Learning Live! is a training and mentoring programme designed to support young people in Tower Hamlets progression into higher education courses, with the aim to aim to increase access into the art and cultural industries.	Borough wide	11,000	38,500
8329	Magic Me	Artworks	Support focused on increasing access to art and cultural industries	Artworks is a new traineeship delivered by arts charity Magic Me, identifying and supporting talented Tower Hamlets Residents from BAME and working class backgrounds to gain the knowledge, skills and confidence to access careers in community arts coordination and producing.	Borough wide	27,596	96,586
						<b>177,751</b>	<b>622,129</b>

# Local Community Fund Recommended Projects

# Appendix F

## Theme 5 - Scheme A: Reduction in the exploitation of children, young people and other vulnerable groups

ID	Organization	Project Title	Main Priority	Short Project Description	Geographical Area Served	Recommend (Annual amount)	Recommend (Total 42 months)
8360	Kazzum Arts	Build	Reduction in the exploitation of children and young people, and vulnerable groups	Build will support young people excluded from mainstream education, currently educated at a pupil referral unit (PRU) in Tower Hamlets. Students in this setting are at risk of exploitation and coercion into criminal activity. Through a programme of creative activities our project will develop confidence, emotional literacy and interpersonal skills.	Bethnal Green	21,184	63,552
8312	Osmani Trust	Schools and Community Resilience Programme	Reduction in the exploitation of children and young people, and vulnerable groups	This proposal seeks to:1. transform and change the attitudes and behaviour of secondary school children; improving their confidence, critical thinking skills and emotional intelligence.2. Deliver a peer programme engaging young people as ambassadors to their peers, changes attitude, promotes understanding, increase community cohesion and ultimately empowers young people.	Borough wide	35,955	125,843
8231	Streets of Growth	Resilient Young Leaders Programme	Reduction in the exploitation of children and young people, and vulnerable groups	The Resilient Young Leaders Programme is an innovative, impactful initiative led by and for young people (15-19 years) to enable young people to build skills and capacity to feel safe, confident, and responsible when demonstrating the community safety and positive change they want to see in their neighbourhoods.	Borough wide	25,816	90,356

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## Theme 5 - Scheme B: Improving the perception of young people in the community

ID	Organization	Project Title	Main Priority	Short Project Description	Geographical Area Served	Recommend (Annual amount)	Recommend (Total 42 months)
8393	Four Corners Ltd	Into Focus photography project	Improving the perception of young people in the community	Into Focus offers an intergenerational photography project for 24 people each year (12 young people aged 14-25 years and 12 over-50s). Groups will create work for a final exhibition, focusing on social perceptions and misconceptions between older and younger people to promote positive attitudes and increasing mutual understanding.	Borough wide Poplar Lansbury Bow West Bow East Shadwell Stepney Green Bethnal Green	16,584	58,044

# Local Community Fund Recommended Projects

# Appendix F

8354	Leaders in Community	Project Connect	Improving the perception of young people in the community	A group of young people recruited by LiC will collaborate with older people to design a programme of activities and celebrations, which enable long-term social connections to be made, and ideas and points of view to be exchanged. The outcomes of the activities will be shared with the wider community.	Borough wide	19,540	68,391
						<b>36,124</b>	<b>126,435</b>

## Theme 5 - Scheme C: Services for people affected by domestic violence or other unsafe circumstances

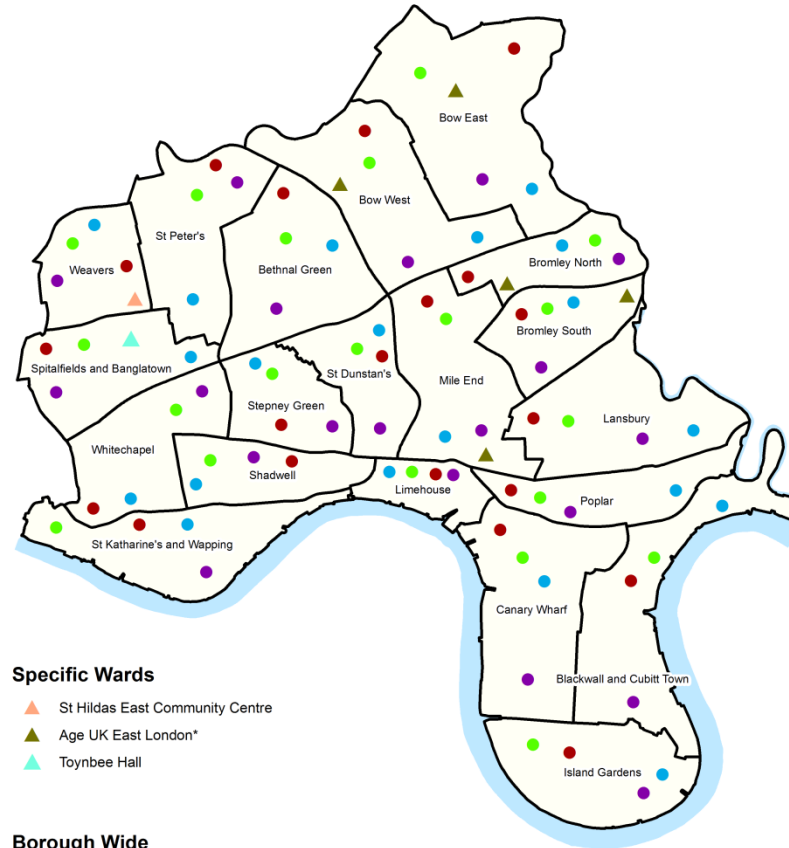
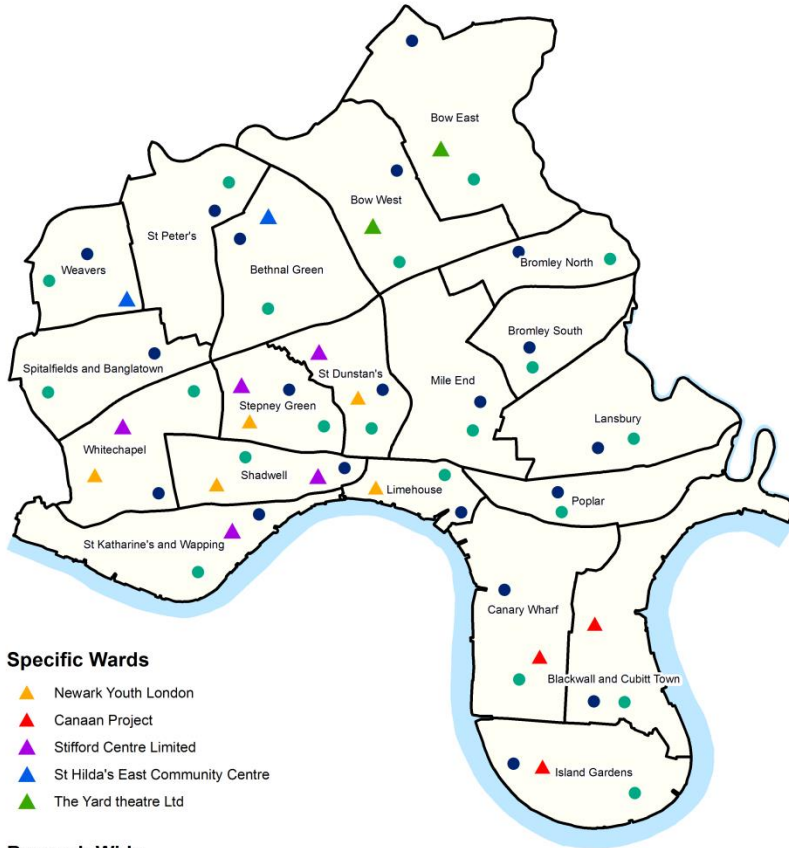
ID	Organization	Project Title	Main Priority	Short Project Description	Geographical Area Served	Recommend (Annual amount)	Recommend (Total 42 months)
8374	Hestia Housing and Support partnership with Nour	Families Safe and Secure in Tower Hamlets	Services for people affected by domestic violence	This project will support families who have experienced DVSA and who are living in a local refuge to address the trauma they've faced and to learn about what a healthy relationship looks like. It will also raise awareness amongst the Tower Hamlets community of DVSA and how to report it.	Borough wide	23,100	80,850
8331	Look Ahead Care and Support	Domestic Abuse Children's Worker	Services for people affected by domestic violence	A specialist Domestic Abuse Children's Worker to support children who are vulnerable due to early exposure to domestic abuse. Providing emotional support through age appropriate engagement, e.g. play, to address challenges faced by children living at our LBTH Domestic Abuse Service and in the community.	Borough wide	40,521	141,825
						<b>63,621</b>	<b>222,675</b>

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Theme 1 - Scheme A: Children, Young People and Families

Theme 1 - Scheme B: Older People



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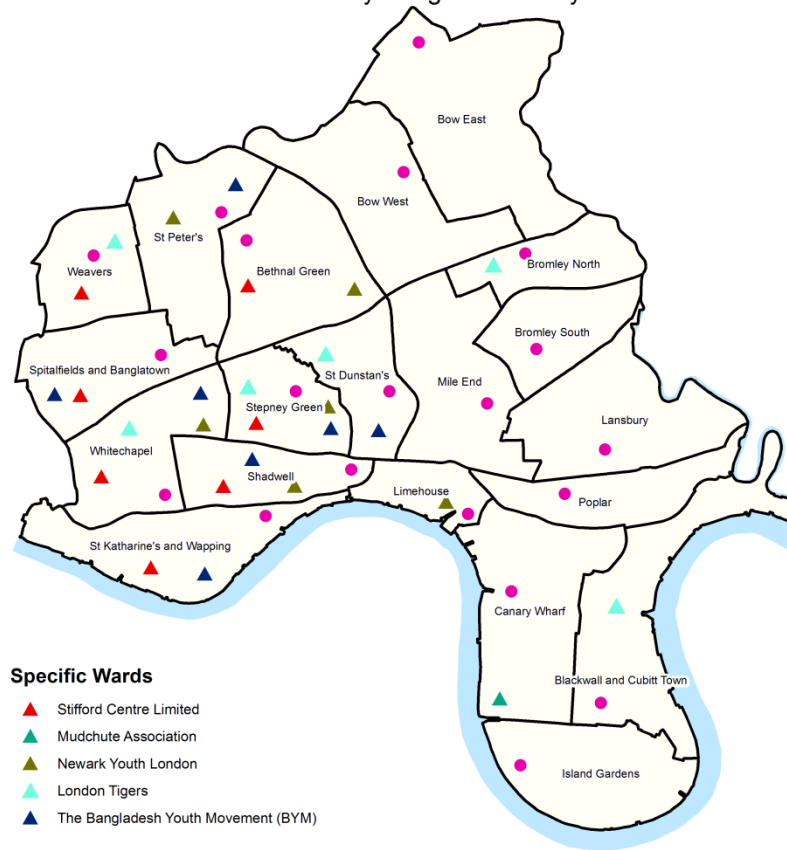
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Theme 1 - Scheme C: Access, Information and Self-Management

Theme 1 - Scheme D: Healthy living and healthy choices

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**Specific Wards**

- ▲ Globe Community Project

**Specific Wards**

- ▲ Stifford Centre Limited
- ▲ Mudchute Association
- ▲ Newark Youth London
- ▲ London Tigers
- ▲ The Bangladesh Youth Movement (BYM)

**Borough Wide**

- Real DPO Ltd

**Borough Wide**

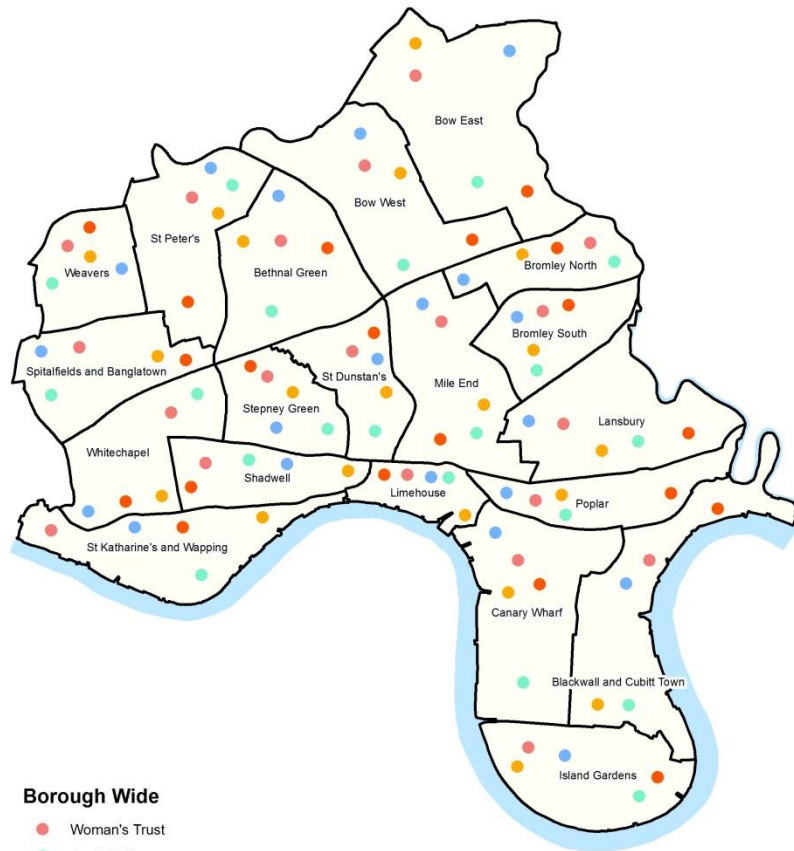
- The Royal Society for Blind Children

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Theme 1 - Scheme E: Improved inclusion, health and well-being outcomes for disabled people and people experiencing mental health issues



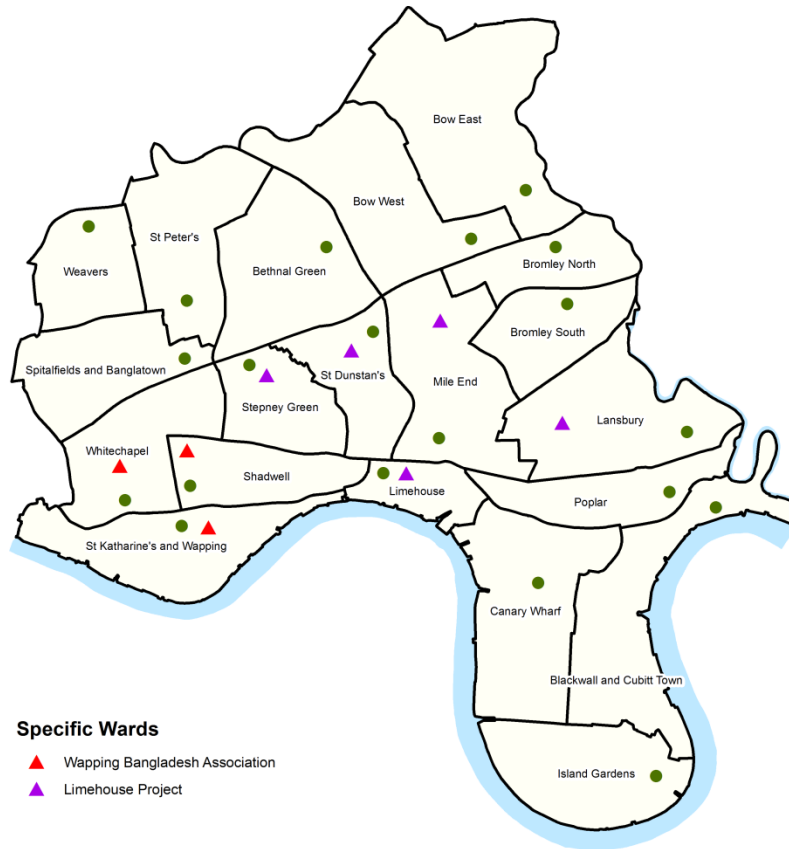
**Borough Wide**

- Woman's Trust
- deafPLUS
- Working Well Trust
- St Hildas East Community Centre
- ICM Foundation CIC

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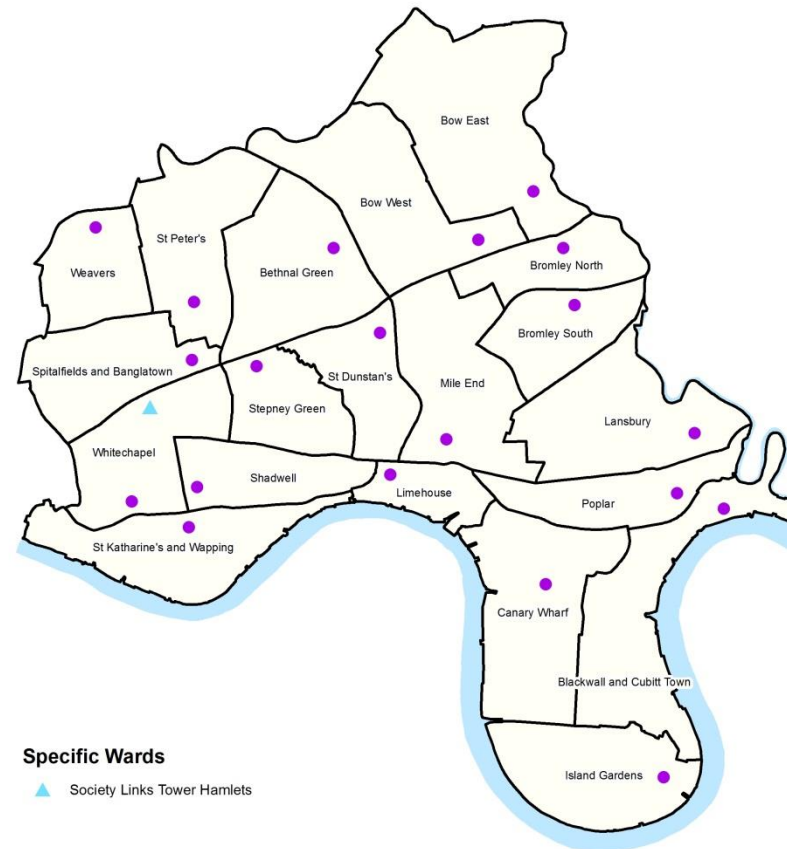
Theme 2 - Scheme A: ICT skills and digital careers



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Theme 2 - Scheme B: Online Safety



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## Theme 3 Advice and Information

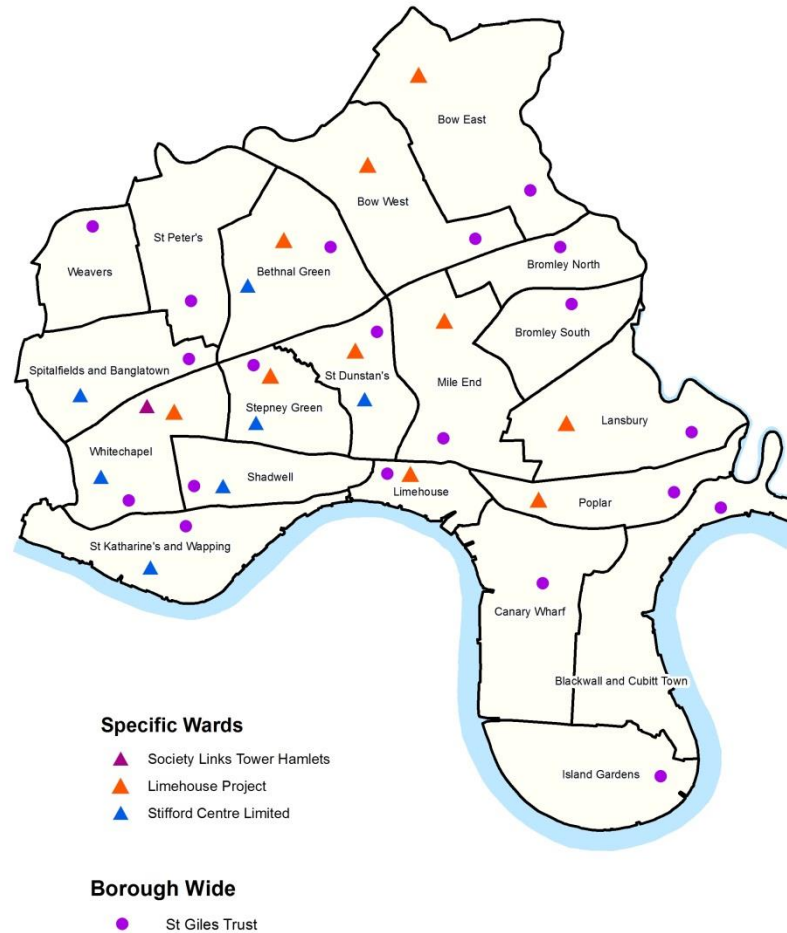


Theme 4 - Scheme A: Developing and embedding good practice in the work place for people with disabilities, learning difficulties and physical and mental health barriers to work



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Theme 4 - Scheme B: Reducing barriers to employment for disadvantaged groups

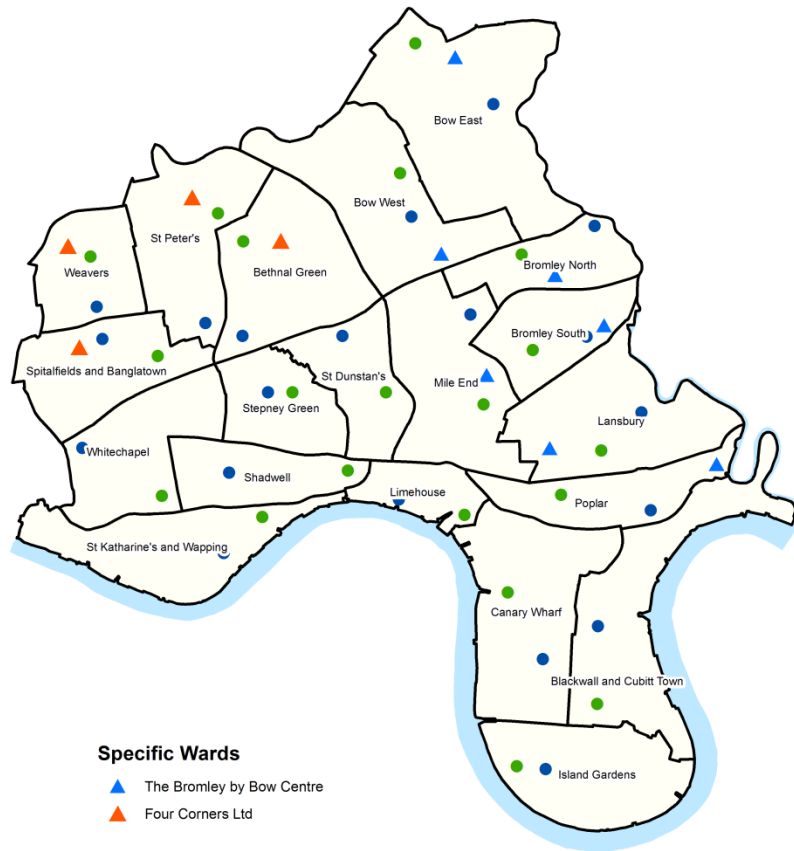


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# Geographic Distribution of Proposed LCF Projects

# Appendix G

Theme 4 - Scheme C: Support focused on increasing access to art and cultural industries



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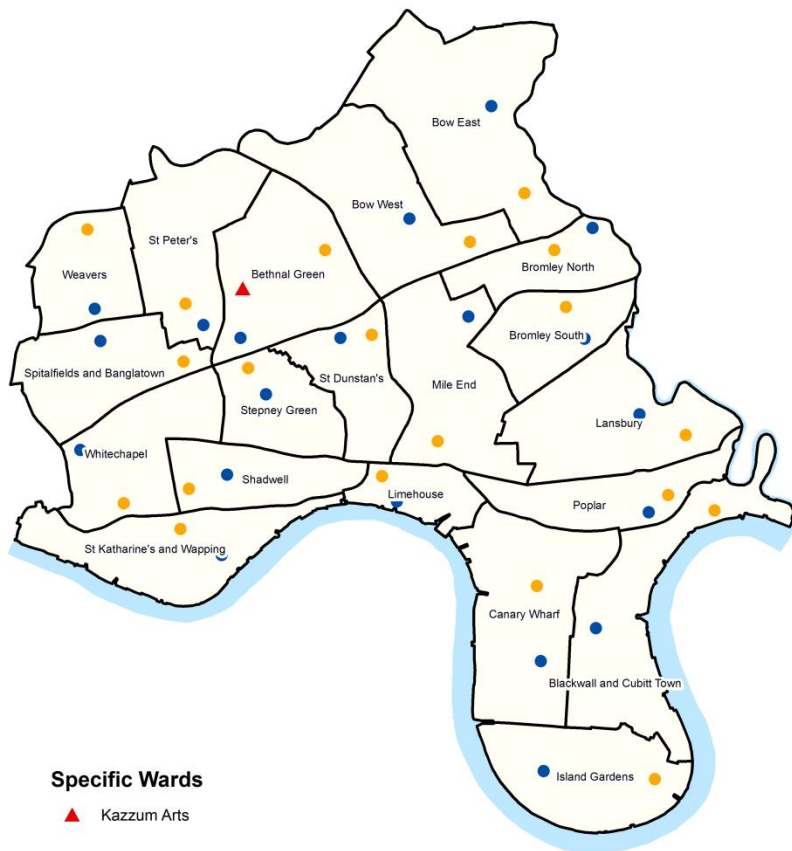
Theme 5 - Scheme A: Reduction in the exploitation of children, young people and other vulnerable groups



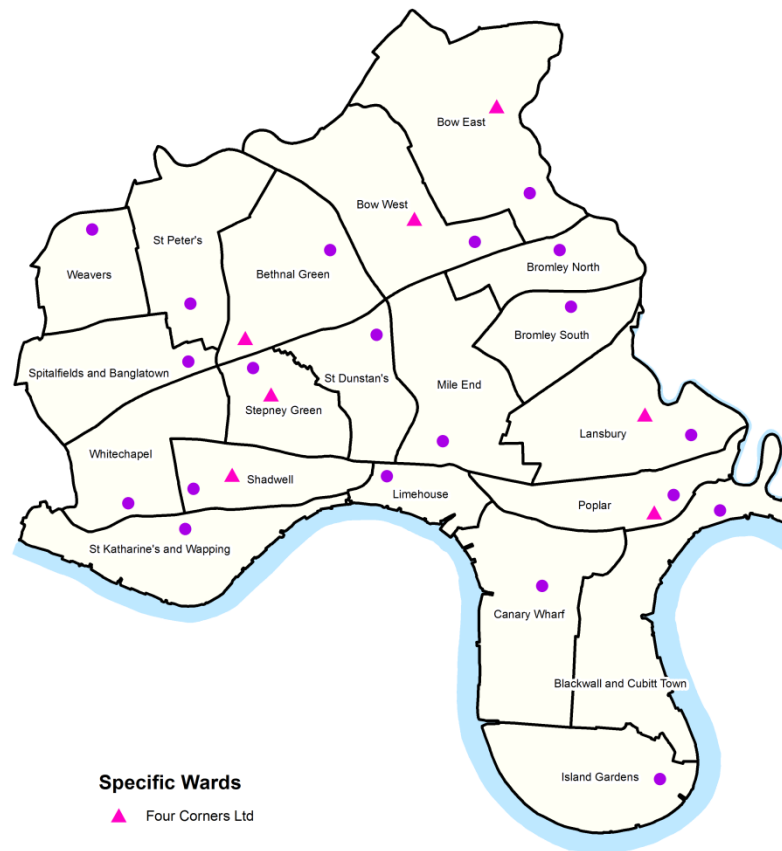
Theme 5 - Scheme B: Improving the perception of young people in the community



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Theme 5 - Scheme C: Services for people affected by domestic violence or other unsafe circumstances



### Borough Wide

- Look Ahead Care and Support
- Hestia Housing and Support

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<p><b>Cabinet</b></p> <p>31 July 2019</p>	 <p><b>TOWER HAMLETS</b></p>
<p><b>Report of:</b> Ann Sutcliffe: Corporate Director Place</p>	<p><b>Classification:</b> Unrestricted</p>
<p><b>LBTH/THH Strategic Review of Housing Management Options</b></p>	

<b>Lead Member</b>	Councillor Sirajul Islam, Cabinet Member for Housing
<b>Originating Officer(s)</b>	Mark Baigent – Interim Divisional Director Housing & Regeneration John Kiwanuka – ALMO Client Manager
<b>Wards affected</b>	All wards
<b>Key Decision?</b>	Yes
<b>Forward Plan Notice Published</b>	Yes
<b>Reason for Key Decision</b>	Financial Threshold and Impact on Wards
<b>Strategic Plan Priority / Outcome</b>	2. A borough that our residents are proud of and love to live in 6. People live in good quality affordable homes and well-designed neighbourhoods.

## Executive Summary

The Council delegated its housing services to Tower Hamlets Homes (THH), a wholly owned Arms Length Management Organisation (ALMO), under the Management Agreement (MA) for ten years from 7<sup>th</sup> July 2008 to 7<sup>th</sup> July 2018, with a break clause after five years. In November 2016, the Mayor agreed to extend the MA for a further two years to 7<sup>th</sup> July 2020. In 2018, the Council commissioned consultants Altair Ltd to support it in exploring options for the delivery of its housing management services beyond 2020. This report sets out the outcome of Altair’s review and recommends a further extension of the MA with THH to 2028, with a break clause after 4 years.

## Recommendations:

The Mayor in Cabinet is recommended to:

1. Note the findings of Altair’s independent review of current housing management arrangements and appraisal of future options (Appendix 1).
2. Consider the outcome of the recent consultation exercise (Appendix 2) and determine whether to proceed with the extension of the Council’s management agreement with Tower Hamlets Homes for four years (to

2024), with a possible extension for a further four years (to 2028).

3. If it is determined to proceed with the extension in accordance with 2 above, delegate to the Corporate Director (Place) after consultation with the Corporate Director (Governance), authority to complete the said extension by July 2020 and do all that is necessary for this purpose.

## **1 REASONS FOR THE DECISIONS**

- 1.1 The strategic housing management option review identified extending the existing Management Agreement as the most effective way to deliver the Council's housing service in the current context. As the status quo option this route presents the least risk to the Council and hence is considered the most suitable, feasible and acceptable option. The review found no evidence to suggest fundamental problems with the current model that would indicate the ALMO should not be retained.
- 1.2 Extending the duration of the existing agreement puts THH onto a sound strategic and financial footing, enabling it to plan for the medium term, and to recruit and retain the staffing capacity appropriate to the purpose that the Council has set for it over that period.

## **2 ALTERNATIVE OPTIONS**

Altair considered a number of housing management delivery options. These are set out in detail in Appendix 1 and summarised below:

- 2.1 Diversified ALMO: A detailed business case would need to be developed for each new or transferred service under consideration. The test is not whether THH could deliver those services well, but rather that THH could deliver them at greater quality and/or more efficiently than LBTH. The suitability of this option is highly dependent on the particular services (if any) that may be considered.
- 2.2 Thinner ALMO: Given that THH is already a 'thin' ALMO, it is not clear what services would be better placed being delivered by the Council. The suitability of this option is highly dependent on the particular services (if any) that may be considered.
- 2.3 In-house Housing Management: The review found that there was no performance or financial imperative to bring the housing service in-house. THH is generally well-performing and is making financial savings to the HRA in line with Council targets. Bringing the ALMO in-house risks losing the improvements to the housing service that THH has achieved in recent years. During the review, Councillors, LBTH staff, and many engaged residents did not consider the housing management service in need of such significant a change in delivery model: "the ALMO isn't broken".

### **3 DETAILS OF THE REPORT**

- 3.1 Previous government policy required Local Authorities to undertake a stock options appraisal to develop a strategy by which all their stock could meet the Decent Homes Standard. In order to bring in the investment needed to achieve this objective, the government provided three main ways to support local authorities who needed additional funding to make their homes decent. These were:
- Setting up an Arms-Length Management Organisation (ALMO)
  - Transferring properties to a Registered Provider of social housing
  - Entering into a Private Finance Initiative (PFI) contract
- 3.2 THH was created in 2008 to secure funding to deliver the Council's Decent Homes Programme. This programme was completed in 2017, with the original Management Agreement (MA) expiring in 2018. In 2016, the Mayor decided to extend the MA by two years to July 2020. Having confirmed the extension of the management agreement, the Council commissioned consultants Altair Ltd to support it in exploring options for the delivery of its housing management services beyond 2020. The review was undertaken in two stages, consisting of a baseline assessment and an options review. Altair's final report is at Appendix1.
- 3.3 Overall, the assessment showed that THH is a generally well-performing housing manager in terms of both housing management performance and cost. The 2017/18 management fee was a reduction on the previous year, reflecting £2.76m savings offset by a £1.33m allowance for short term growth items. This was to be the first year of a five-year programme delivering savings of £6m in total (£2m in 2017/18, and £1m p.a. thereafter). A further £1m saving in the total management fee was identified for 2018/19 despite additional resources for fire safety and Service Level Agreement increases. Additional successes include:
- Improving housing management service performance.
  - Resident satisfaction has steadily increased.
- 3.4 There is scope to make improvements in a number of areas and there is evidence that some of these are being addressed (e.g. contract management resourcing). Some improvements (e.g. mobile working) are dependent on IT upgrades, the timing of which may be outside THH's control. Some costs (e.g. agency staff to fill vacant posts) are being carried pending service reviews to avoid the likely (higher) alternative costs of redundancies. There is further evidence of performance improvements over recent years and the extensive transformation programme currently being delivered.
- 3.5 However, THH continues to operate under the legacy of a troubled delivery of Decent Homes, which is likely to remain an operational challenge for THH in terms of repairs and major works, and a reputational challenge with some residents. This has also been evidenced in some of the resident's responses to the Council's consultation on the Altair review and subsequent recommendations. There are also challenges for both THH and the Council in

the relationship between the two organisations, which would benefit from more clarity of delegations, roles and expectations, and from a better framework for strategic discussion and alignment between the Council and the ALMO.

### **3.6 Management Agreement**

3.6.1 The Management Agreement (MA) defines the relationship between the Council and THH which sets out the obligations of each party. Extending the duration of the existing MA puts THH onto a sound strategic and financial footing, enabling it to plan for the medium term, and to recruit and retain the staffing capacity appropriate to the purpose that the Council has set for it over that period.

3.6.2 The MA extension is therefore an opportunity for the Council to formally record the variations that have already emerged over the 12 years, particularly where THH has assumed direct responsibilities that were originally provided by the Council. This will also address the outcome of the Council's exploration of the scope for additional service transfer options from the Council to THH, in a limited number of areas including:

- New build, for example delivering new build homes on rooftops, and possible in-fill schemes within existing blocks (such as undercrofts and block extensions).
- Aspects of private sector management powers where these can help better resolve management problems on estates.
- Management of acquired temporary accommodation and possibly homes not owned by Tower Hamlets Homes.

3.6.3 Subject to the Mayor in Cabinet deciding on the future of THH, officers will revise the management agreement with THH to ensure that it is fit for purpose and strengthen the Council's governance arrangements accordingly.

### **3.7 Policy Context**

3.7.1 The decision of whether to extend the management agreement or to take an alternative approach is highly dependent on the local context. The proposed decision reflects the wider housing strategy of the borough, the nature of the local housing market and the need for councils to deliver services more efficiently.

3.7.2 An increasing number of councils are now seeing their ALMO as a flexible vehicle to deliver a wider range of services to local communities. This includes 30% of ALMOs now managing a total of 1,113 properties in the private rented sector, 36% of ALMOs providing services to tackle joblessness and 55% offering money advice. With the conclusion of Decent Homes funding, most Councils in London including Hackney, Lambeth, Hounslow, Brent, Newham, Hounslow, and Waltham Forest have taken the decision to bring their housing stock back into the Council's direct control.

3.7.3 However, a number of other authorities have extended their ALMO Management Agreements, typically for a period of five to ten years with some extending by up to 30 years. These include Barnet, Lewisham, Blackpool, Barnsley, Brent, Derby and Solihull. In addition, some local authorities have established brand new ALMOs including East Kent and Welwyn Hatfield. Cheltenham and Bassetlaw have extended their management agreements for 30 and 15 years respectively. A number of councils have transferred their stock to the ALMO for example Bolton and East Durham.

#### **4 CONSULTATION**

4.1 Council tenants and leaseholders were fully involved in the decision to set up THH, both as part of the options appraisal process and the consultation on the ALMO option itself. Although the consultation did not involve a full ballot, which is not a legal requirement, the Council was able to demonstrate clear support for the ALMO option.

4.2 A combination of consultation approaches have been adopted to consult with residents leading up to the proposed recommendation to extend the Management Agreement. Residents were extensively consulted as part of the options review conducted by Altair. The consultation with residents involved three focus groups, online and telephone surveys. 780 and 300 residents responded to the online and telephone surveys respectively. A comprehensive analysis of the outcome of the surveys is included in appendix1.

4.3 As part of finalising the proposals regarding the future of Tower Hamlets Homes, officers undertook further consultation with residents once the Mayor had considered the Altair report and indicated his preferred way forward. Section 105 of the Housing Act 1985 requires that the Council consults secure tenants who are likely to be affected by a matter of housing management. The consultation went further to include both tenants and leaseholders.

4.4 A letter was sent from the Mayor to all tenants and leaseholders (see appendix 3). This consultation ran for four weeks to 10<sup>th</sup> June 2019. The Mayor invited them to consider the findings and recommendations from Altair and to express their views on his preferred way forward.

4.5 A total of 197 residents responded by email or telephone, 85 leaseholders and 74 tenants. 38 residents did not identify their tenure type. The analysis of the views expressed by of both tenants and leaseholders is shown in tables 1 and 2 below.

Table 1

<b>TENANTS</b>		
<b>IEWS</b>		<b>%</b>
In favour	40	54%
Unclear	9	12%
Not in favour	25	34%
Total	74	100%

- 4.6 Of the 74 tenants expressing a clear view, 54% were in favour of the review recommendation to extend the Management Agreement with THH.

Table 2

LEASEHOLDERS		
VIEWS		%
In favour	25	30%
Unclear	15	17%
Not in favour	45	53%
Total	85	100%

- 4.7 Of the 85 leaseholders expressing a clear view 30% were in favour of the review recommendation to extend the Management Agreement with THH.
- 4.8 Tenants who raised concerns about existing services primarily identified the inconsistencies in the advice they receive from THH staff. Tenants also expressed dissatisfaction with the repairs service, the contractors' approaches, and resultant experiences. In contrast, leaseholders raised concerns around lack of clarity of service charge invoices, capital programme consultation and delivery, incremental services charges and insurance. Overall, there was positive recognition of improvements in the services THH provides by both tenants and leaseholders although management of ASB had mixed views. Residents also want THH to be held more accountable for service failures, and for the Council to scrutinise THH's performance further, and to engage further with residents. Detailed results from the consultation are appended at **Appendix 2**.

## **5. EQUALITIES IMPLICATIONS AND OTHER STATUTORY IMPLICATIONS**

### **5.1 Equalities**

- 5.1.1 There are no specific equalities implications arising from this report. The proposed eight years (to 2028) extension, with a possible break after four years (in 2024) of the Council's MA with THH will have no impact on the Council's Duties under the Equality Act 2010. Services to residents will remain the same as before. It is the Council's duty to ensure that THH deliver efficient and accessible services that meet the needs of all residents.

### **5.2 Best Value Implications,**

- 5.2.1 For THH to deliver successfully it will need to be run effectively and managed robustly by its own staff, with appropriate client managing by council officers. HRA business plan savings have been identified as part of the council's budget setting process and THH will continue to be responsible for completing delivery £6m of the HRA savings by 2021. THH should provide a value-for-money solution, by reducing management costs over time and enhancing performance in key areas such as capital programme delivery and contract

management. THH has already embarked on transforming its services under the transformational agenda.

### **5.3 Environmental (including air quality)**

There are no specific environmental implications arising from this report.

### **5.4 Risk Management**

- 5.4.1 Altair noted that the costs involved in a decision to continue the existing arrangements would be minimal hence this is the lowest risk option. A decision to revert to in house management would involve risks and costs associated with the reorganisation of the service and possible redundancies. A decision to make the ALMO thinner would be difficult as THH is already 'thin', therefore, it is not clear what services would be better placed being delivered by the Council. A decision to diversify the ALMO would require developing a detailed business case for each new or transferred service under consideration. On the other hand, extending the duration of the existing MA puts THH onto a sound strategic and financial footing, enabling it to plan for the medium term, and to recruit and retain the staffing capacity appropriate to the purpose that the Council has set for it over that period.

### **5.5 Crime Reduction**

There are no specific crime and disorder implications arising from this report.

### **5.6 Safeguarding**

There are no specific safeguarding implications arising from this report.

### **5.7 Data Protection / Privacy Impact Assessment.**

There are no specific GDPR implications arising from this report.

## **6 COMMENTS OF THE CHIEF FINANCE OFFICER**

- 6.1 The decision to extend the management agreement with Tower Hamlet Homes will not have any specific financial implications. Under the extended management agreement, Tower Hamlets Homes will continue to be paid an annual management fee as set out in the financial schedule of the agreement which will form part of the HRA budget setting process each year. All costs will be contained within the ring fenced Housing Revenue Account.
- 6.2 Funding for the transfer of any new services as part of this extension will need to be contained within existing budgets or further savings will need to be realised to prevent the HRA budget being in deficit.

## **7 COMMENTS OF LEGAL SERVICES**

- 7.1 The Council has various statutory functions and obligations in respect of the provision of housing and associated services.
- 7.2 The Council is obligated under Section 3 of the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness. This is the Council's Best Value Duty. The Council must ensure that the provision of the services by its ALMO meets this duty.
- 7.3 The extension of the management agreement is considered to be a matter of housing management under S.105 of the housing Act 1985 and has rightly been consulted upon. DGLG guidance also considers it good practice to consult on extensions of management agreements. Before making a decision on the proposal to extend the Management Agreement, the Cabinet must conscientiously consider the outcome of the consultation exercise.
- 7.4 The Council is not restricted by Procurement Law in respect of any changes it may wish to make to the Management Agreement in order to formally record the variations referred to in paragraph 3.6.2. This is because THH Limited is a wholly owned subsidiary of the Council and services and the associated contract provided by THH Limited to the Council are exempted by virtue of Regulation 12 of the Public Contracts Regulations 2015.
- 7.5 The Council will also review the scheme of delegation to THH Limited to ensure that the appropriate functions and delegated powers in respect of those functions are transferred to THH Limited in order to carry out any amended scope of the Management Agreement.
- 7.6 The Council must continue with a robust system of monitoring the performance of THH Limited in order to demonstrate that the Management Agreement represents Best Value as referred to in paragraph 7.2 above.
- 7.7 When carrying out its functions, the Council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those do not (the public sector duty).
-



## **Linked Reports, Appendices and Background Documents**

**Linked Report:** NONE

### **Appendices:**

Appendix 1 – Altair Strategic Review report

Appendix 2 – Consultation response summary

Appendix 3 – Mayor’s letter to residents

**Background Documents – NONE**

**Officer contact details for documents: John Kiwanuka Ext 2616**

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Altair

# London Borough of Tower Hamlets Strategic ALMO Options Review

Report

April 2019



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## 1 | Executive Summary

### 1.1. Stage 1: Baseline Assessment

1.1.1. Tower Hamlets Homes (THH) was originally created in 2008 to secure funding to deliver the Council's Decent Homes Programme. This programme was completed in 2016, with the Arm's-Length Management Organisation's (ALMO's) original management agreement expiring in 2018. The decision was taken by the Council to extend the ALMO's management agreement by two years to July 2020.

1.1.2. Having confirmed the extension of the management agreement, London Borough of Tower Hamlets (LBTH) commissioned Altair to support it in exploring options for the delivery of its housing management services beyond 2020. The review was undertaken in two stages, consisting of a baseline assessment and an options review.

1.1.3. The purpose of the Baseline Assessment stage of the project was to review the current strategic, operational and financial context of LBTH and THH; and to assess the effectiveness of THH as a housing manager, considering its strengths and challenges. Our baseline assessment consisted of the following activities:

- Document review
- Face-to-face and telephone interviews
- Resident and councillor focus groups
- THH resident and board member surveys
- Performance benchmarking
- Value for Money and business plan assessment

1.1.4. Our Stage 1 findings have been grouped into four key themes:

- Vision and Strategy
- Performance
- Value for Money
- Stakeholder Views

#### Vision and Strategy

1.1.5. Transformation is a key feature in THH's 2018/19 Business Plan. The Business Plan includes reference to six significant business change projects or programmes. The extensive approach to business transformation is evidence of THH responding to the Council's desire to achieve a continuously improving housing service for residents.

1.1.6. The THH Business Plan presents transformation as the means of achieving what it describes as the 'management fee savings target' of £6m over five years, which has

been set by LBTH. However, there is some lack of clarity about whether the target refers to savings from THH's management fee or the HRA as a whole.

- 1.1.7. Strategic alignment between LBTH and THH is maintained through a framework of regular meetings at senior levels, including the Mayor's Housing Meetings, Quarterly Strategic Meetings and the attendance of senior LBTH officers at THH board meetings. We found that THH could make more explicit reporting of how its achievements align with the ambitions of the Council.

#### Performance

- 1.1.8. The performance metrics show that customer satisfaction is high across THH's services, indicating that in terms of the quality of service delivery, THH is performing well. This is supported by the strong (if relatively high-cost) Anti-Social Behaviour (ASB) resolution performance.
- 1.1.9. The proportion of THH housing stock which is non-decent is significantly higher than the average for its London local authority and ALMO peers. Consequently, THH has high capital expenditure per home. This is likely to be due to legacy issues with Decent Homes delivery.
- 1.1.10. Repairs performance appears mixed with a good average completion time, but with a high number of repairs per property, per year. This results in a high overall cost per property for repairs and void works. This may be due to the relatively high percentage of non-decent housing stock. The rate of repairs completed 'right first time' is also lower than comparator organisations but has significantly improved over recent years.
- 1.1.11. While THH performs comparatively very well in terms of managing voids to minimise void loss, its performance in rent collection is generally below average. However, the relatively poor performance in rent collection metrics is at least partly related to the Southwark ruling on water rates (where this is collected with rent). Until the situation is resolved, water rate arrears will obscure the true rent arrears performance. Leaseholder charge collection presents a mixed picture with day-to-day service charge collection being strong, but major works recharge collection representing an area that THH could improve.
- 1.1.12. Overall, benchmarking suggests that THH is a generally well-performing housing manager, as evidenced by good satisfaction, ASB and void management metrics. There is room for improvement in some areas such as income collection and repairs and it is encouraging that THH's performance across a number of metrics including 'right first time' repairs and satisfaction with major works, has improved over the last two to three years. THH is investing in its existing stock (delivering works of a greater value than planned), although it is still behind its peers for the percentage of non-decent housing stock.

#### Value for Money (VFM)

- 1.1.13. In terms of THH's cost performance, the high-level findings reflect mixed

performance on value for money - strong cost efficiency in the lettings function, but a high cost, high volume responsive repairs service. Benchmarking indicates a generally positive picture in terms of THH's current performance in providing VfM – costs are either broadly in line with its peer group or compare favourably.

- 1.1.14. There is scope to make improvements in a number of areas and there is evidence that some of these are being addressed (e.g. contract management resourcing). Some improvements (e.g. mobile working) are dependent on IT upgrades, the timing of which may be outside THH's control. Some costs (e.g. agency staff to fill vacant posts) are being carried pending service reviews to avoid the likely (higher) alternative costs of redundancies.
- 1.1.15. The 2017/18 management fee was a reduction on the previous year, reflecting £2.76m savings offset by a £1.33m allowance for growth items. This was to be the first year of a five-year programme delivering savings of £6m in total (£2m in 2017/18, and £1m p.a. thereafter). A further £1m saving in the total management fee was identified for 2018/19 despite additional resources for fire safety and Service Level Agreement increases.
- 1.1.16. We did not find evidence of substantial tracking of VfM cost Key Performance Indicator (KPI) data. While THH has been able to identify savings and has been carrying out service reviews across its functions, the lack of regular reporting of cost KPIs and/or cost benchmarking is an important gap in THH's strategic approach to achieving VfM.

#### Stakeholder Views

- 1.1.17. The current clienting and governance arrangements between LBTH and THH are generally effective. However, they are regarded by many stakeholders as lacking clarity and suffering from duplication of meetings (with the same attendees) and reporting. There is a common desire to have greater clarity and formalisation of roles, responsibilities, and delegations in the relationship between the ALMO and the Council.
- 1.1.18. The clienting relationship between LBTH and THH was characterised by LBTH staff that we spoke to as "arm's-length" and one in which THH are allowed to "get on with it" with Council intervention kept to a minimum. Some credited this approach to allowing THH to innovate and engage in transformation relatively free of the bureaucracy and politics of the Council. However, some saw this approach as leading to a relationship where LBTH is not as assertive or clear as they should be in their clienting of the ALMO.
- 1.1.19. From the evidence which we have gathered and the interviews and focus groups which we have undertaken, there appears to be a tension between THH's desire to act independently in many regards and an understandable desire within LBTH to have greater control over the ALMO. Greater clarity in LBTH's expectations of the ALMO and a common vision for the relationship with the ALMO would benefit both organisations.



- 1.1.20. Residents expressed positive feedback for caretaking and fire safety and acknowledged progress that was being made with regards to ASB. Residents saw major works and management of contractors as particular areas for improvement for THH. This is consistent with the views of some LBTH officers and ALMO board members. Communication was identified as a key area for improvement in resident focus groups. Residents felt that communication between teams within THH, with the Council, and with residents should be improved.
- 1.1.21. We found the perception of some residents to be significantly influenced by historic experiences, that in many cases had occurred several years ago. Historic and legacy issues with Decent Homes works featured prominently in our discussions with residents and were a source of frustration and disappointment for several residents we spoke with.
- 1.1.22. Councillors we spoke to were positive about THH's record on community development and engagement. Councillors also praised the ALMO's approach to tackling ASB. However, THH's capital works delivery was identified as being a source of concern for some of the Councillors who attended our focus group.

### Summary

- 1.1.23. Overall, our assessment is that THH is a generally well-performing housing manager in terms of both housing management performance and cost. There is room for improvement in some key areas of service delivery but evidence of performance improvements over recent years and an extensive transformation programme currently being delivered are positive.
- 1.1.24. THH continues to operate under the legacy of a troubled delivery of Decent Homes, which is likely to remain an operational challenge for THH in terms of repairs and major works, and a reputational challenge with some residents. There are also challenges for both THH and LBTH in the relationship between the two organisations, which would benefit from more clarity of delegations, roles and expectations, and from a better framework for strategic discussion and alignment between the Council and the ALMO.
- 1.1.25. We found no performance or financial imperative to significantly change the housing management arrangements for the LBTH stock currently managed by THH.

## 1.2. Stage 2: Options Assessment

1.2.1. The purpose of the Options Assessment stage of the project was to develop a series of options to enable London Borough of Tower Hamlets (LBTH) to consider how it might deliver housing management in the future. We outlined five options for consideration by the Council:

- In-House Management
- Management Agreement Extension
- Extension with Fewer Services
- Extension with More Services
- Extension with a Different Mix of Services

### The ALMO Model

1.2.2. The Decent Homes programme of the 2000s saw the introduction of Arm's Length Management Organisations (ALMOs). At their peak in 2009/10 there were 70 ALMOs managing approximately 1 million homes. Since then, this number has reduced by more than half to 31, with the trend to bring services back in-house under direct council management strongest in London, where at present there are only 5 ALMOs.

1.2.3. Periodic reviews of ALMOs at appropriate contract break points may be a trigger for bringing an ALMO in-house, although some authorities have taken the opportunity to retain or expand their ALMO at these points. Anecdotal evidence suggests that while perceived poor performance may be a catalyst for bringing services in house, political will and the relationship between the Council and the ALMO are also a factor.

### The Options

1.2.4. The options were reviewed, taking account of LBTH's context and THH's performance and assessed against suitability, feasibility and acceptability criteria.

### Option 1: In-house Management

1.2.5. For LBTH and Tower Hamlets Homes (THH) the in-house management option, whereby THH would transfer into the Council represents the most significant change from the status quo. The housing management service would be transferred to the Council when the current management agreement ends in July 2020.

1.2.6. Key considerations for this option included:

- The Council separately already has plans to bring refuse collection in-house in 2020 and the transformation programme ongoing to 2022 will be in progress, which presents a risk that the Council will have two significant change projects occurring within a similar timeframe and may not have sufficient capacity for

transfer of the housing management services undertaken in 2020. Even without these other change activities, 2020 may be too challenging a target date for bringing the ALMO in-house, given the necessary preparation and processes to successfully transfer the service.

- If LBTH were minded to bring the ALMO in-house, it may be more suitable to do so following the move to the new Civic Centre in 2022 and the associated integration of some LBTH and THH back-office systems and processes.
- Key areas where savings are usually made in transferring an ALMO in-house are staff, facilities, and governance. Due to the sharing of facilities already planned at the Whitechapel Civic Centre, potential savings are significantly reduced in the case of LBTH and THH. It is also worth noting that savings can easily be offset by poor performance, if the transfer causes any performance weaknesses (for example due to loss of staff, or operational challenges).
- Bringing the ALMO in-house may encourage closer working between housing and other council departments and may help to ensure delivery of LBTH's strategic objectives through having direct control of the housing management function.
- However, the transfer would be costly, and moving away from the ALMO model of service delivery for housing management typically dilutes a cultural and organisational focus on housing (including the loss of a dedicated board).

### Option 2: Management Agreement Extension

1.2.7. This option represents a continuation of the status quo that would result from an extension of the existing management agreement. As such, there are limited financial or legal implications.

1.2.8. Key considerations included:

- The status quo option enables THH to continue to build on its established brand, and the ongoing work delivering against cost reduction targets set by LBTH. However, compared to expanding the portfolio of services delivered by the ALMO this option may not make the most of opportunities to generate 'added value' for LBTH.
- There is also a need to review the client management arrangement to ensure that it is effective going forward.

### Option 3: Extension with Fewer Services

1.2.9. This option would involve extending the management agreement for THH but varying the terms so that some services / functions would transfer from THH to LBTH.

1.2.10. Key considerations included:

- Following the Council's transformation plan, LBTH may feel that some high-performing Council functions could more effectively and efficiently deliver services either to, or instead of, THH. However, we note that there are no current plans to transfer any THH functions to the Council and based on our findings in Stage One of this report, it is not clear that there are any service areas which are strong candidates for transfer from THH to LBTH.
- A partial transfer of services risks splitting management functions, potentially creating friction between related functions, and may create duplication rather than efficiencies, as well as leading to a lack of clarity over roles and responsibilities. However, it may provide an opportunity to realise economies of scale in some Council functions.

#### Option 4: Extension with More Services

- 1.2.11. This option would involve extending the management agreement for THH but varying the terms so that some services / functions would transfer into the ALMO from LBTH. This would mean that THH would become 'diversified' with a wider service offering.
- 1.2.12. Key considerations included:
- Typical services delivered by diversified ALMOs include those previously delivered by the Local Authority, such as homelessness and housing options (Barnet Homes), new-build housing development (Stockport Homes) and even street cleaning (South Tyneside Homes). Services may also be provided to third parties such as private sector lettings, or the delivery of market rent housing.
  - An expanded ALMO may be able to deliver efficiencies of scale, and potentially generate income to cross-subsidise the General Fund.
  - However, were THH to expand its service offer there would likely be the need for greater clienting from the Council. It may also lead to an operational distance and lack of control over service delivery.

#### Option 5: Extension with Different Services

- 1.2.13. Under this option THH would gain some additional service areas, either from the Council or through creating new commercial activities, but simultaneously some activities would move from THH to the Council.
- 1.2.14. This option is therefore an amalgamation of Options 3 and 4, and the risks and implications described above would apply to it.

#### Summary: Review of Housing Management Models

- 1.2.15. Stage 1 of this review found that there is no performance or financial imperative to bring the housing service, currently delivered by THH, in-house. However, equally given the limited scope of THH's current offer there may not be a compelling reason

to retain the ALMO indefinitely.

- 1.2.16. Given the other activity being undertaken in 2020 relating to refuse collection and transformation, transferring the ALMO at this time, when its current management agreement ends, may create additional risk to the successful delivery of a transfer. Even without these other change activities, 2020 may be too challenging a target date for bringing the ALMO in-house.
- 1.2.17. Overall, retaining THH (Option 2) scores the highest in our options assessment. However, this scoring is based on the assumption that THH continues to deliver for the Council and achieve costs savings against the targets set by LBTH, that resident satisfaction and other performance is either maintained or continues to improve.

### 1.3. Recommendations

- 1.3.1. Based on the findings of the Stage 1 report and our analysis in this Stage 2 report, we make a series of recommendations to be taken forward were each option to be implemented. Regardless of which option LBTH chooses to take forward a detailed business case should be developed which considers the financial case for the change (or status quo) and considers risks and mitigations.
- 1.3.2. If LBTH implements any of the options in which the management agreement is extended, LBTH should consider the role of the clienting function within LBTH, ensuring it has clarity over its role and priorities.
- 1.3.3. Recommendations for LBTH and THH arising from Stage 1 (some of which will only apply if THH is retained) are listed below:
- The Council should clarify to THH its expectations regarding the ALMO's savings targets
  - THH should be more explicit reporting of how THH's achievements align with the ambitions of the Council
  - THH should continue to target higher leaseholder satisfaction, given the large proportion of leaseholders in their resident body (approximately 45%)
  - THH should note the common feedback from both residents and LBTH about the quality of major works and contract management and seek to make improvements as necessary
  - THH should consider investment in income collection functions, in the context of the service review of the rent collection function undertaken in summer 2018 (the recommendations of which have not yet been implemented) and to improve major work recharge collection rates
  - THH should implement regular reporting of cost KPIs and/or cost benchmarking to support the ALMO in achieving VfM

- LBTH should consider the purpose of the various bodies in the THH governance/ engagement structure to ensure that the division of responsibilities, delegations and terms for each are clear and fit for purpose
- LBTH and THH should work together to formally clarify their respective roles (including the levels of delegation and authority) in order to reduce duplication of meetings, papers etc. between the two organisations
- LBTH and THH should work together to provide clarity over the Council's expectations of the ALMO
- Consideration should be given to how best to improve communication between teams within THH, between THH and the Council, and between both of these bodies and residents

1.3.4. The key recommendations for LBTH for each option assessed as part of Stage 2 are summarised in the table below.

In-House Management	<ul style="list-style-type: none"> <li>▪ Consider how to address resourcing the transfer</li> <li>▪ Rationalise the senior management structure at THH, and consider the wider staff structure</li> <li>▪ Undertake detailed work to estimate potential savings, and put in place mitigation strategies for identified risks</li> <li>▪ Consider how LBTH can measure and report on the impact on both services and costs of the transfer</li> <li>▪ Undertake consultation with stakeholders, and develop an appropriate communication strategy</li> <li>▪ Give consideration to successor resident engagement and scrutiny bodies</li> <li>▪ Consider the future role of the current clienting function</li> </ul>
Management agreement extension	<ul style="list-style-type: none"> <li>▪ Consider whether to extend the existing savings targets</li> <li>▪ Review services, cost and performance</li> <li>▪ Undertake negotiations to extend the agreement</li> <li>▪ Communicate the decision to relevant stakeholders</li> </ul>
Extension with fewer services	<ul style="list-style-type: none"> <li>▪ Consider which services should be transferred from the ALMO</li> <li>▪ Assess how the management fee should be changed to reflect the reduced scope of services</li> <li>▪ Assess the wider financial impacts of bringing some services in house</li> <li>▪ Communicate the decisions to stakeholders, ensuring clarity about the revised split of services and responsibilities</li> </ul>
Extension with more services	<ul style="list-style-type: none"> <li>▪ Explore the potential for additional service delivery to third parties</li> <li>▪ Consider how additional service delivery may impact on the management fee</li> <li>▪ Assess the wider financial implications of services being transferred to the ALMO</li> <li>▪ Direct THH to develop individual business cases for each service area to be transferred</li> <li>▪ Ensure that legal requirements such as EU procurement regulation and the Teckal exemption are addressed</li> <li>▪ Work with THH to support the ALMO to produce updated Articles of Association which reflect the new service delivery position</li> <li>▪ Develop a joint communication strategy with THH to notify those affected by the changes.</li> </ul>

## 2 | Introduction

### 2.1. Tower Hamlets context

#### Demography

- 2.1.1. The population of Tower Hamlets is young and diverse, with residents of over two hundred different nationalities and the lowest percentage of over-65s of any UK borough<sup>1</sup>. The borough is facing a range of demographic challenges including significant income disparity. While the average salary of the borough is the second-highest in the UK, Tower Hamlets has the highest rate of pensioner poverty in England at 50% (versus a national average of 16%) and also the highest rate of child poverty (31% versus a national average of 17%). Overall, it is estimated that around four in ten householders in Tower Hamlets are living below the poverty line, the highest rate across all local authorities (LAs) in England and Wales.
- 2.1.2. Healthy life expectancy rates are lower than the London and England averages, and are particularly low for women. The borough also has a higher rate of preventable or premature deaths than the London or England averages, and has the highest infant mortality rate in London. This reflects the relatively high levels of deprivation in the borough.

#### Housing

- 2.1.3. Tower Hamlets is the fastest-growing borough in London, both in terms of its housing stock and population. The borough is growing by over 3,000 homes per year, resulting in a 27% increase in housing stock since 2003 and a total of 124,000 homes in Tower Hamlets<sup>2</sup>. In addition, the borough has experienced the fastest population growth in the country since the turn of the millennium; its current population of approximately 317,200 is expected to reach almost 365,000 by 2026. Population growth has outpaced housing stock growth, contributing to a housing waiting list of approximately 19,000 households, the second-largest in London.
- 2.1.4. Approximately 30,000 of the homes in Tower Hamlets are managed by housing associations; over 45 operate in the borough, including members of the G15, group of London's largest housing associations, such as Clarion, A2Dominion and Peabody. The social housing stock in the borough is dispersed across several different providers. The table below shows those housing associations that own or manage over 1,000 social homes in Tower Hamlets.

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<sup>1</sup> [https://www.towerhamlets.gov.uk/ignl/community\\_and\\_living/borough\\_statistics/Borough\\_profile.aspx](https://www.towerhamlets.gov.uk/ignl/community_and_living/borough_statistics/Borough_profile.aspx)

<sup>2</sup> LB Tower Hamlets 2016-21 Housing Strategy

**Other social housing providers with a significant number of homes in Tower Hamlets**

HAs (with >1,000 units) in Tower Hamlets	Social units in Tower Hamlets
Poplar HARCA Limited	5,840
Old Ford Housing Association Limited	3,341
One Housing Group Limited	3,321
Gateway Housing Association	2,637
East End Homes Limited	2,254
Tower Hamlets Community Housing Limited	2,077
East Thames Limited	1,943
Swan Housing Association Limited	1,774
Notting Hill Genesis Housing Association Limited	1,648
Southern Housing Group Limited	1,450
Peabody Trust	1,353

**2.2. Tower Hamlets Homes**

- 2.2.1. LBTH has delegated the management of 21,000 homes of council-owned stock (comprising social rented homes and former right-to-buy leaseholder homes) to its arms-length management organisation (ALMO), Tower Hamlets Homes (THH). LBTH also transferred some council-owned homes to housing associations in the borough including Tower Hamlets Community Housing and East End Homes.
- 2.2.2. Prior to this, the Council delivered housing services itself, receiving 3-star ratings from the Audit Commission in relation to its housing provision immediately prior to the establishment of THH<sup>3</sup>.
- 2.2.3. THH was originally created in 2008 to secure funding to deliver the Council's Decent Homes Programme. This programme was completed in 2016, with the ALMO's original management agreement expiring in 2018. The ALMO is 100% owned by the Council and provides a range of services to Council tenants and leaseholders including:
- Rent and service charge collection
  - Complaints handling
  - Major works, planned and cyclical maintenance
  - Caretaking and gardening

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<sup>3</sup> Audit Commission (2009), *Annual Audit and Inspection Letter, London Borough of Tower Hamlets, Audit 2007/08*



- Anti-social behaviour (ASB) case handling
- Housing and tenancy management services
- Leasehold services

2.2.4. In 2016 the decision was taken by the Council to extend the ALMO's management agreement by a further two years to July 2020.

### 2.3. Objective of the review and our approach

2.3.1. Having confirmed the extension of the ALMO, LBTH is now looking to explore options for the delivery of its housing management services beyond 2020, with the long-term strategic objective of providing the best possible and continuously improving housing service to residents, securing fire safety, maintaining and improving the Council's physical assets, and enhancing the Council's reputation.

2.3.2. LBTH has specified that there is no intention to explore potential changes in ownership or the creation of a new entity as part of this review (for example, undertaking a stock transfer or establishing a Registered Provider (RP)). This review has been commissioned to consider three possible options for the delivery of housing management services post-2020:

- Bring all THH services back in-house from 2020
- Extend the existing THH Management Agreement
- Extend the existing THH Management Agreement and shift services between LBTH and THH

2.3.3. Altair has been commissioned to undertake this review of options.

2.3.4. To undertake this review, we gathered information from a range of sources including:

- Document review – we reviewed a wide and extensive range of Council and ALMO documents, to develop a strong initial understanding of THH's business, its current performance and its strategic and operational context. A full list of the documents which we reviewed is available at Appendix A.
- Interviews – A total of 13 interviews were undertaken with a wide range of key stakeholders including THH staff, THH partner organisations, Council staff and councillors. The purpose of these interviews was to flesh out our baseline assessment with the qualitative views of a range of key stakeholders, enabling us to validate our initial findings.
- Focus groups – we facilitated several focus groups: three with residents (including a representative mix of tenants and leaseholders) and one with councillors. The purpose of these focus groups was to seek views on the strengths and weaknesses of current housing management arrangements, and to explore their views on opportunities and risks for the future of the management of LBTH housing stock.

- Surveys – we surveyed THH residents to engage and consult a large number of people on their views on THH as a housing manager. This enabled us to capture different viewpoints on the organisation. The online survey was administered by Altair and publicised by THH and was completed by over 780 people. The telephone survey was administered by Kwest who contacted 300 residents to participate in the survey. We also conducted a survey of THH board members.
- Business Plan analysis – We undertook an analysis of the Housing Revenue Account (HRA) Business Plan, and THH’s financial performance. This work had a particular focus on Value for Money (VfM) and identified areas of strong performance, as well as where improvements in efficiency could be achieved.
- Performance benchmarking – We used HouseMark benchmarking data to consider the comparative performance of THH across the business as well as reviewing THH data to understand trends in performance over recent years.
- Case study review – We developed case studies which exemplify the different housing management options under consideration by the Council. This helps to provide context to the options and provide information on the impact of each approach.

2.3.5. Stage 1 of this review provides an assessment of Tower Hamlets Homes as a housing manager, including reference to housing management performance, stakeholder views, financial performance, and alignment of the strategic objectives between LBTH and THH. Stage 2 of this review draws on the information from Stage 1 in order to inform an assessment of each of the options identified by the Council and listed in 2.3.2 above.

## Stage 1: Baseline Assessment

2.3.6. The purpose of this stage of the project was to review the current strategic, operational and financial context of LBTH and THH; and to assess the effectiveness of THH as a housing manager, considering its strengths and challenges. Our baseline assessment consisted of the following activities:

- Document review
- Face-to-face and telephone interviews
- Resident and councillor focus groups
- THH resident and board member surveys
- Performance benchmarking
- Value for Money and business plan assessment

2.3.7. Our Stage 1 findings have been grouped into four key themes:

- Vision and Strategy
- Performance
- Value for Money
- Stakeholder views

2.3.8. Each of these themes is explored in further detail in the following chapters.

## 3 | Vision and Strategy

### 3.1. Introduction

- 3.1.1. THH has a three-year business plan, 'Working Together', which sets out the organisation's corporate priorities for 2016-19. THH refreshes the business plan annually, the current business plan being the third and final year of the 'Working Together' plan. THH's annual business plans are supported by a suite of other corporate strategies including a People Strategy, Digital Strategy, Transformation Programme, and a joint Asset Management Strategy with LBTH.
- 3.1.2. These documents were reviewed alongside the Council's relevant strategies (namely its 2016-21 Housing Strategy) and the management agreement with LBTH, alongside other evidence gathered through activities undertaken in the baseline review.

### 3.2. Key Priorities

- 3.2.1. THH's Business Plan sets out the organisation's strategic priorities under three overarching objectives to:
  - Deliver Organisational Excellence
  - Maintain Homes and Neighbourhoods to be Proud of
  - Provide Excellent Customer Service
- 3.2.2. Under 'Deliver Organisational Excellence' THH targets a collection of eight further strategic objectives. These are largely focused on transformation (of processes, IT systems, digital access, and customer data), improving performance in areas with room for improvement (namely right first-time repairs and rent and service charge collection), and improving HR and people practices (providing better guidance, staff developments, and performance management).
- 3.2.3. To 'Maintain Homes and Neighbourhoods to be Proud of', THH has objectives covering maintaining up to date fire risk assessments, maintaining cleaner neighbourhoods, tackling ASB, and managing contractors more effectively to reduce complaints and improve right first-time rates.
- 3.2.4. To 'Provide Excellent Customer Service', THH has objectives to clarify and enforce rights and responsibilities between the ALMO and its residents, to expand their offer to provide a 'new deal' for leaseholders, and work with partners to assist vulnerable residents to remain in their homes.
- 3.2.5. In pursuit of these objectives, THH has a Service Improvement Plan (SIP). In 2017/18 the SIP comprised of activities across seven different projects/initiatives. Key activities included the establishment of a new performance appraisal process and a talent management scheme (People Strategy); completion of some outstanding 2016/17 Decent Homes works and procurement of fire risk works

(Capital Works); ASB team restructure and contracting of ASB partners (ASB improvement); and the introduction of online services for leaseholders and review of Neighbourhood Team as part of the Transformation Programme (New Deal for Leaseholders).

- 3.2.6. The service areas targeted for improvement in 2018/19 are Better Neighbourhoods and Safer Homes (fire safety), Neighbourhood Improvement (curtilage works), and Welfare Reform (support for residents affected by welfare reform).

### 3.3. Transformation

- 3.3.1. Transformation and change are key features in the 2018/19 Business Plan. The Business Plan presents transformation as the means of achieving what it describes as the 'management fee savings target' of £6m over five-years, that has been set by LBTH. The savings are to be £2m in 2017/18 and a further £1m each year for the following four years. This savings target represents a reduction in THH's management fee of approximately 20%.
- 3.3.2. However, the cabinet report of December 2016 which recommended the extension of THH's management agreement to 2020, states that the target of £6m over five-years refers to savings from the Housing Revenue Account (HRA). The HRA has a gross annual expenditure of around £80m, out of which THH is responsible for its Management Fee (£31m), a further £6m for service level agreements (SLAs) for services from the Council, as well as delegated budgets of around £32m.
- 3.3.3. THH is delivering savings to delegated budgets and SLAs, counter to the expectations of some LBTH stakeholders. Lack of clarity about whether the savings are targeted as a reduction to THH's management fee or HRA expenditure as a whole, has the potential to cause issues between LBTH and THH if not resolved. For the benefit of all stakeholders, not least THH, the Council should be clear about its expectations regarding THH's VfM objectives. This target is explored further in Section 4 below.
- 3.3.4. THH recognise that delivering services on a smaller budget requires significant transformation. As such, THH has developed a number of service transformation programme and strategies. The Business Plan includes reference to no fewer than six significant business change projects or programmes, each with its own programme board. Many of these programmes have been active for the last year or two, some were started in this financial year.
- 3.3.5. The Business Transformation Programme has seen new structures implemented in 2017/18 for business support functions such as finance, communications and HR, as well as some service delivery functions such as ASB, repairs, and neighbourhood management.
- 3.3.6. Whilst the bulk of the structural changes are complete, further projects that include structure reviews are underway for leasehold services, environmental services, and rental income collection. A further review of the staffing structure of THH's ICT function is also planned for 2019.

- 3.3.7. THH has developed a Digital Strategy to digitalise its services, including through a new online portal, MyTHH. The digital strategy also includes developing a mobile working solution and improving the systems used by the contact centre to handle repairs reporting / scheduling.
- 3.3.8. Since launching in May 2017, over 3,400 residents have registered for MyTHH which enables residents to view rent and service charge statements, report repairs, changes to tenancy such as giving notice on a tenancy or license agreement and requesting changes to or from joint tenancies, and log requests for issues such as bulk rubbish. THH states that the most popular services on MyTHH are My Rent Account, My Details, My Repairs and My Leasehold Account. The popularity of these online services is likely to be an important contributing factor to the significant reduction of in-bound calls to THH that relate to those service areas. Between 2017/18 and 2018/19, THH has seen a reduction of inbound calls related to balance / statement requests of between 80-90% and a reduction of between 93-98% in the number of calls to make leasehold or rent payments.
- 3.3.9. THH also has a Customer Access and Experience Programme which seeks to redesign processes with a view to improving them and moving them online where possible. The first phase of the Programme is being delivered over the course of 2018/19. This phase includes communal and responsive repairs, parking, and ASB services.

#### 3.4. Community investment

- 3.4.1. In addition to 'core' landlord functions set out above in paragraph 1.2.3, THH also provides services designed to improve the health, financial, and employment outcomes of its residents. Since 2016, THH has had a Community Investment Strategy which targets the following objectives:
- Create safer neighbourhoods
  - Increase financial resilience
  - Support mental wellbeing and vulnerability
  - Build resilient and cohesive communities
- 3.4.2. In pursuit of these objectives, THH has established partnerships with: Streets of Growth, a youth charity who engage high risk young people and positively influence their lives through targeted intervention; training provider Go Train, to deliver an employability programme; and a number of local organisations to train local women in childcare for employment as childminders or in local nurseries. Feedback from external partners is provided in Section 6 of this report.

#### 3.5. Alignment with the Council

- 3.5.1. LBTH is currently delivering its 2016 – 2021 Housing Strategy. This strategy is based around four key delivery themes:

1. **Delivering affordable housing, economic growth and regeneration** – including maximising affordable home building, completing a full capacity study of council-owned land, and setting up a housing company to deliver new homes both inside and outside of the borough.
  2. **Meeting people’s housing needs** – including refreshing the Council’s Homelessness Statement into an aligned Homelessness Strategy, contributing to the development of a Corporate Ageing Well Strategy, and ensuring that young people’s housing needs are fairly reflected in the development of housing allocation and homelessness policies.
  3. **Raising private rented housing standards** – including reviewing selective/additional licensing schemes for the private rented sector, developing enhanced support for landlords, and developing and implemented a resident and stakeholder engagement programme to promote the rights of private tenants.
  4. **Effective partnership working with residents and stakeholders** – including developing more effective working with Registered Providers (RPs) operating in the borough, neighbouring authorities, and private and third sector partners.
- 3.5.2. Both the Council’s Housing Strategy and the Tower Hamlets Partnership Community Plan (2015) are explicitly referenced in THH’s 2018/19 Business Plan. The Business Plan states that “so far we have made a major contribution to assuring the Council meets its commitments to achieving Decent Homes and improving neighbourhoods.” However, no evidence of how THH has directly supported the Council’s objectives is provided in the Business Plan document. Given that the Business Plan is titled ‘Working Together’, the document would benefit from the inclusion of more explicit reporting of how THH’s achievements align with the ambitions of the Council.
- 3.5.3. Despite the relative lack of evidence presented in the 2018/19 Business Plan, we are aware that strategic alignment between LBTH and THH is maintained through a framework of regular meetings at senior levels (including the Mayor’s Housing Meetings, Quarterly Strategic Meetings and the attendance of senior LBTH officers at THH board meetings).
- 3.5.4. The THH Board includes four councillors, four residents, and four independents, as is typical for ALMOs. The Board is occasionally attended by LBTH’s Divisional Director for Housing and Regeneration and the THH Chair meets with the Mayor and the Lead Member for Housing, at the quarterly Mayor’s Housing Meetings.
- 3.5.5. The THH 2018/19 Business Plan states that the ALMO has more to offer the Council but does not elucidate what that offer might include. We understand that THH is in the process of developing an offer to the Council which includes the delivery of additional services, some of which are currently delivered by LBTH. Discussion about the transfer of services between the Council and THH are explored further in Part Two of this report.

### 3.6. Key findings

- 3.6.1. There is lack of clarity about whether THH savings targets are intended as a reduction to THH's management fee or HRA expenditure as a whole. This confusion of expectations has the potential to cause issues between LBTH and THH if not resolved.
- 3.6.2. Strategic alignment between LBTH and THH is maintained through a framework of regular meetings at senior levels, including the Mayor's Housing Meetings, Quarterly Strategic Meetings and the attendance of senior LBTH officers at THH board meetings.
- 3.6.3. Both LBTH's Housing Strategy and the Tower Hamlets Partnership Community Plan (2015) are explicitly referenced in THH's 2018/19 Business Plan. However, the document would benefit from the inclusion of more explicit reporting of how THH's achievements align with the ambitions of the Council.



## 4 | Performance

### 4.1. Introduction

4.1.1. In this section we use benchmarking data to better understand the relative performance of THH. For most housing providers, the key performance areas are:

- Net income collection
- Quality of service delivery
- Investment (either in improvements, or new business / growth)

4.1.2. We have structured this section according to these broad categories.

4.1.3. While benchmarking is a useful tool in understanding how well an organisation is performing, it is important to recognise its limitations. While the peer group comparators have been chosen for their similarity to THH, (i.e. they are all London ALMOs / LAs, or they all operate in Tower Hamlets), there may be other factors driving relatively good or poor performance (e.g. the age and type of stock managed, the level of need of customers and the geographic dispersal of stock are all factors in performance).

4.1.4. Therefore, when interpreting benchmarking information, we have been mindful of factors that may cause variation in performance. Rather than focussing on small variations in performance that may be accounted for by limitations in benchmarking, we have identified key trends within the data.

4.1.5. We have used four sources of data in undertaking the review of THH's performance. To give as accurate a view of current performance as possible we have used the most recent available data, and for all performance information have clearly specified the financial year to which it relates:

- THH's KPI performance reports provided to the ALMO board (Business Critical Indicators); with reference to the year end 17/18 results, and the June 2018 report.
- THH's HouseMark benchmarking schedules for 2017/18 (which include a benchmark group of 19 London Local Authorities' and ALMOs)
- Analysis of the Local Authority Housing Statistics (LAHS) 2016/17 for all London Boroughs
- Analysis of information provided in the Global Accounts 2016/17 for eight RPs with more than 1,000 units located in Tower Hamlets

4.1.6. These benchmarking groups have been chosen as they offer a good comparison to THH, based on their size and geography. The list of comparator organisations used for this benchmarking exercise can be found in Appendix B.

4.1.7. In addition to performance data, we have included, where relevant, the views of

stakeholders that we received in focus groups and interviews.

## 4.2. Quality of Service Delivery

4.2.1. The quality of the customer experience is key to THH as a provider of social housing, and as an organisation delivering a service on behalf of the Council. There are a number of ways to measure the quality of the customer experience; these include satisfaction measures, delivery timescales, 'right first time' approaches, and the experience of customer facing interactions.

### Satisfaction

4.2.2. Customer satisfaction is a key way of understanding the quality of a provider's housing offer and the experience of its residents. The table below provides information about THH's satisfaction scores across the available data:

	Tower Hamlets Homes BCI Report and HouseMark (17/18)			HouseMark LA and ALMO Comparator (17/18)			
	Performance	Rank (of 11)	Target	UQ <sup>4</sup>	M <sup>5</sup>	LQ <sup>6</sup>	
Percentage of issues resolved at first point of contact	92.30%		70%				
Percentage of residents agreeing with the statement 'THH does what it says it will do'	79%		80%				
Overall Satisfaction: Residents	82%		82%				
Overall Satisfaction: Tenants	87%	Q1	UNK	76.03	73.55	66.98	●
Overall Satisfaction: Leaseholders	70%		68%				

4.2.3. While there are only benchmarks for one area of customer satisfaction, in this area (overall satisfaction amongst tenants) THH performs significantly better than peers. The results show high overall satisfaction for tenants when compared to other London local authorities and ALMOs. In terms of resolving issues at first point of contact, where failures can be a key driver of complaints, THH achieved a very strong result of 92.30% in 2017/18. THH has high targets which suggest that it and the LBTH client team place significant value in resident satisfaction.

4.2.4. Satisfaction amongst leaseholders, at 70%, is considerably lower than tenant satisfaction at 87%. It is not uncommon for leaseholder satisfaction to be lower than

<sup>4</sup> Upper Quartile

<sup>5</sup> Median

<sup>6</sup> Lower Quartile

tenant satisfaction. This is a phenomenon that many London local authorities and ALMOs experience and is reflected in the lower target set by the Council for leaseholder satisfaction.

- 4.2.5. THH recognises that leaseholder satisfaction is an issue for the organisation and has included a number of measures in their transformation plans to address common leaseholder concerns, including notification of planned works and payment options. THH should continue to target higher leaseholder satisfaction, given the large proportion of leaseholders in their resident body (approximately 45%).

### Repairs, Maintenance and Major Works

- 4.2.6. How THH performs in managing the property assets on behalf of the Council is key to the long-term value of the stock and is often the most important factor in the experience of residents. The table below shows how THH performs across several repairs, maintenance and capital works measures.

	Tower Hamlets Homes BCI Report and HouseMark (17/18)			HouseMark LA and ALMO Comparator (17/18)				
	Performance		Rank (of 19)	Target	UQ	M	LQ	
Total repairs avg per property	6.15	Q4	19		3.14	3.73	4.62	●
Average completion time (days)	6.21	Q2	6		5.69	7.35	10.69	●
Repairs % completed at first visit	85.90	Q3	11		95.50	88.90	85.45	●
Satisfaction with Repairs Service (%)	91.70%	Q2	5	n/a				
Average cost of a responsive repair (£)	131.81	Q2	6		127.86	137.49	156.94	●
Total Cost Per Property (CPP) of responsive repairs & void works (£)	1,328.29	Q3	15		841.88	998.86	1,329.37	●
Major Works Programme Delivery (%)	102%			85%				
% of residents rating capital works as excellent, good or fair	96%			75%				
Satisfaction with Caretaking (%)	85%			85%				

- 4.2.7. The performance metrics show that THH performs well across satisfaction measures for repairs, major works and caretaking. Repairs completion times are also above median for the local authority and ALMO peer group.

- 4.2.8. However, the average number of repairs per property is the highest in the group. The high number of repairs per property may be due to a lower threshold for repairs ordering, and/or difficulties with the quality of the stock. Given the high rate of non-decency (as discussed in section 3.5 below), the poor condition of some housing stock will likely be a key influencing factor on the number of repairs per property. Testimonies from THH repairs staff explain that where capital works are delivered,

there is a notable decrease in the volume (and cost) of repairs.

- 4.2.9. THH performs below the median for the number of repairs completed at the first visit. Multiple visits to resolve an issue will increase completion times and costs, and THH should consider how it can improve performance in 'right first time' repairs. However, it should be noted that THH's performance of 86% 'right first time' for 2017/18 represents a significant improvement over the previous two years, during which time the rate has increased from 77%. The cost of responsive repairs is considered further in Section 4, paragraph 5.4.7 – 5.4.11 below.
- 4.2.10. In the table above, we have used the % of residents rating capital works as excellent, good or fair, from THH's board reports<sup>7</sup>. THH's performance in this metric has improved over the two years to 2017/18 from 77% to 96%.
- 4.2.11. The high percentage of residents rating capital works as fair, good, or excellent appears to be at odds with our findings from the residents' survey and focus groups which identified major works as an area requiring improvement. However, these perceptions are likely to be influenced by historic incidents of poor performance.
- 4.2.12. Similarly, LBTH stakeholders we spoke to expressed concern about the quality of major works and asset management in general. However, it is our understanding from both residents and LBTH stakeholders that the percentage of non-decent homes (which remains at over 10%) is an influencing factor in their view of THH's major works performance.
- 4.2.13. Both residents and stakeholders in LBTH also felt that part of the issues they perceive with THH's major works performance relate to procurement and management of contractors. THH staff described the organisation as being 'on a journey' and referred to improvements in asset management as part of this process of improvement. In the absence of data to benchmark, THH should note the common feedback from both residents and LBTH about the quality of major works and contract management and should seek to make improvements as necessary.

#### Anti-Social Behaviour (ASB)

- 4.2.14. While ASB will often impact on a minority of customers, it can be extremely detrimental for communities and those customers who experience ASB. The nature of ASB means it often impacts on the wider community and influences stakeholder perceptions. The table below outlines THH's performance in managing ASB in its stock.

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<sup>7</sup> THH does not collect data that conforms to HouseMark's definition for tenant satisfaction with major works (satisfaction with quality of home).

	Tower Hamlets Homes BCI Report and HouseMark (17/18)			HouseMark LA and ALMO Comparator (17/18)				
	Performance	Rank (of 19)	Target	UQ	M	LQ		
<b>Direct cost per ASB case (£)</b>	1,010.71	Q3	7		724.15	947.02	1,886.21	●
<b>Resolution rate %</b>	96			90				
<b>Direct ASB employees per 1,000 properties</b>	1.45	Q4	18		0.54	0.81	1.00	●
<b>No. new cases per 1,000 properties</b>	76.68	Q3	10		17.10	46.53	76.68	●
<b>Total CPP of ASB (£)</b>	115.10	Q4	18		43.22	70.14	97.55	●

- 4.2.15. The metrics show that THH deals with a high number of ASB cases when compared to other local authorities and ALMOs. It is also spending more to address ASB (per property) than other comparator organisations. While this spend puts them in the lower quartile in the benchmark group, the very high resolution rate that THH achieves is likely due to this investment. Given the relatively high number of ASB cases, this investment is likely to be warranted.
- 4.2.16. Ahead of the extension of the management agreement, ASB was identified by LBTH as a service area that THH should focus on improving. Since then, the ASB service has been restructured, provided additional resources, and moved into Environmental Services along with the caretaking management team. In 2017, Parkguard, a provider of ASB services to LAs and the police, was engaged to patrol THH estates and has done so since then. THH has also funded police activity on its estates, through a 2 for 1 police officer funding deal with the GLA.
- 4.2.17. THH's additional spend on tackling ASB and the improvements in this service area were recognised by residents in our focus groups (see Section 5, paragraph 5.7.7 of this report).

### 4.3. Income and Void Performance

#### Income

- 4.3.1. Fundamental to the ongoing financial viability of any organisation is the net income position, which is the effective profit or surplus that THH generates. There are two key strands to performance in net income: gross income and expenditure. THH's relative expenditure, including the costs of service delivery and corporate overheads is explored in below.
- 4.3.2. Whilst as an ALMO, THH receives a management fee, the key operational sources of income are rent and service charge. The factors that indicate performance in these areas are how much rent and service charge is collected (e.g. rent arrears and bad debt performance), and the amount of time for which rent is due on a property (e.g. void performance). The table below highlights THH's performance across a number of rent collection metrics.

	Tower Hamlets Homes (17/18)			HouseMark LA and ALMO Comparator (17/18)				LBTH RP Comparators (16/17)			
	Performance		Rank (of 19)	UQ	M	LQ		UQ	M	LQ	
<b>Current tenant arrears %</b>	4.47	Q4	15	2.33	3.52	4.28	●	4.75	5.07	6.58	●
<b>FTA %</b>	2.21	Q2	9	1.46	2.22	2.54	●	1.38	2.41	3.21	●
<b>Rent collected %</b>	98.91	Q3	13	100.06	99.46	98.63	●				
<b>Total CPP of rent arrears and collection (£)</b>	166.58	Q3	10	114.36	165.88	196.40	●				
<b>Gross arrears written off %</b>	0.25	Q3	10	0.09	0.22	0.52	●				
<b>Rent not collected due to arrears %</b>	1.09	Q3	12	-0.10	0.62	1.39	●				

- 4.3.3. THH performed below the average (median) for the London local authority and ALMO peer group for rent collection and arrears, except with regard to former tenant arrears where the collection rates are just above median levels. When compared to RPs, THH's performance is in the upper quartile for current tenant arrears; however, the former tenant arrears figure is much lower for the sample group of RPs than for THH.
- 4.3.4. THH's bottom-quartile rent arrears performance is at least partly related to the Southwark ruling on water rates (where this is collected with rent)<sup>8</sup>. THH's recent

<sup>8</sup> Many LA landlords enter agreements with water companies to collect water and sewage charges from tenants who don't have water meters. The tenant pays water charges to the LA as part of the rent. The LA typically receives a discount from the water company to reflect the fact it bears the cost of collection and the risk of bad debts and voids. The Jones v Southwark decision in March 2016

HouseMark report notes that prior to the ruling THH's arrears were only slightly above the median level – until the situation is resolved, water rate arrears will obscure the true rent arrears performance.

- 4.3.5. The Southwark ruling affected around twelve other London Boroughs. LBTH joined a consortium of local authorities to challenge the judgement. In relation to agreements made by this consortium THH were instructed by LBTH Legal Services that any recovery action should exclude any debt accruing from water rates charges. THH claim that this policy has severely impacted on its rental income metrics and debt levels.
- 4.3.6. Since the summer of 2018, we understand that LBTH has changed its instructions and THH has been progressing cases where water rates are a significant factor in the debt. We understand that THH's rent collection has improved and as at the end of October 2018, the collection rate was 99.6%.
- 4.3.7. Although not benchmarked in the table above, major works recharge collection is also an area where THH has room to improve. Performance results show that the rate of major works recharge collection has fallen from 106% in 2015/16 to 85% in 2017/18. This was also an area that LBTH stakeholders referred to as an area in which they would like to see THH improve.
- 4.3.8. In contrast to major works recharge collection, THH's recent performance in leasehold service charge collection is positive. Data supplied by THH shows that over the last three years (2015-18), THH has collected 107% of the debit raised for day-to-day service charges from leaseholders.
- 4.3.9. The cost of THH's rent arrears and collection function is very close to the median for the London local authority and ALMO comparator group at £166.58 per property at THH, compared to the median of £165.88. Investment in arrears collection can often result directly in better performance, and this may be an area THH wishes to consider investing in. It should be noted that we are aware that THH conducted a service review of its rent collection function in summer 2018, the recommended changes of which have not yet been implemented.
- 4.3.10. Based on the benchmarking, rent collection appears to be a performance area that THH could strengthen. Based on THH's KPIs and feedback from stakeholders, THH

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turned on whether the landlord was acting as an agent or as a 'reseller' for the purposes of the Water Resale Order (WRO) 2006. The WRO restricts the amount that a purchaser of water (landlord) can charge when re-selling the water to the final consumer (tenant). The court held that Southwark was buying water and sewerage services from Thames Water and reselling them to its tenants. As a result, the WRO applied and served to limit what tenants could be charged. In effect, the WRO entitles re-sellers to impose only very modest administration charges. Because s150 of the Water Industry Act 1991 gives individuals a statutory right to recover charges levied in breach of the WRO, claims for possession based on rent arrears may be complicated by counter-claims for those overpaid sums.

should also consider focusing on improving major work recharge collection rates.

### Void performance

4.3.11. A property is considered void when it is unoccupied. As unoccupied properties, voids do not generate rental income. Therefore, long void periods will result in lower income to the business. The table below highlights THH's void performance across key metrics:

	Tower Hamlets Homes (17/18)			HouseMark LA and ALMO Comparator (17/18)				LBTH RP Comparators (16/17)			
	Performance		Rank (of 19)	UQ	M	LQ		UQ	M	LQ	
<b>Average re-let time (standard re-lets) (days)</b>	23.10	Q1	4	24.00	27.50	32.60	●				
<b>Total CPP of lettings (£)</b>	30.84	Q1	5	31.22	41.57	69.95	●				
<b>Void loss %</b>	0.37	Q1	2	0.55	0.85	1.45	●	0.71	1.30	1.80	●
<b>Average cost of a void repair (£)</b>	3,341.14	M	7	2,958.90	3,341.14	4,874.69					
<b>Average re-let time (major works voids)</b>	40.70	Q1	2	50.31	76.90	98.75	●				
<b>Dwellings vacant and available % at year end</b>	0.20	Q1	5	0.20	0.27	0.46	●				

4.3.12. Across all void performance metrics THH compares favourably to local authority and ALMO peers. THH also outperforms RPs in terms of void loss, the only metric for which data is available for this comparator group.

4.3.13. THH had the fourth shortest re-let times of the comparator group at 23.10 days. This represents a marked improvement from 30 days only two years earlier, in 2015/16. It is worth noting that the very best performers in this metric can achieve very short re-let times (as at year end 16/17 Barnet had achieved an average re-let time of 13.53 days). THH may therefore be able to further enhance its already strong performance in this area to achieve further reduced void loss.



#### 4.4. Asset investment

- 4.4.1. Investing in stock maintains its condition and reduces the need for future repairs, as well as improving residents' experience and living conditions. The table below shows THH's investment in the stock it manages:

	Tower Hamlets Homes (16/17) BCI reporting (17/18)			LAHS LA and ALMO Comparator (16/17)				LBTH RP Comparators (16/17)		
	Performance		Rank	UQ	M	LQ		UQ	M	LQ
Average total CapEx per SR unit (£)	4,019.33	Q1	2 of 26	1474.15	2175.42	2731.32	●			
Non-decent dwellings as % of LA owned stock	12.8	Q3	20 of 27	0.68	7.20	16.84	●			
Major works programme delivery	102%									

- 4.4.2. THH has a high proportion of non-decent stock at 12.8%. This is significantly higher than the median of 7.2% for its local authority and ALMO peer group. This is more than likely a reflection of issues with the implementation of the Decent Homes programme, which were raised frequently in our discussions with some staff and residents.
- 4.4.3. The performance metrics show that THH has one of the highest levels of financial investment in its social rented stock compared to its local authority and ALMO comparators. THH has also exceeded delivery of its major works programme in 2017/18 (delivering works of a greater value than planned). Whilst not necessarily a positive indicator, given its high proportion of non-decent stock, it is likely positive for THH and indicates that THH is delivering against improvement plans.

## 4.5. Key Findings

- 4.5.1. The performance metrics show that customer satisfaction is high across THH's services, indicating that in terms of the quality of service delivery, THH is performing well.
- 4.5.2. The proportion of THH housing stock which is non-decent is significantly higher than the average for its London local authority and ALMO peers.
- 4.5.3. Repairs performance appears mixed with a good average completion time, but with a high number of repairs per property, per year. This results in a high overall cost per property for repairs and void works. This may be due to the relatively high percentage of non-decent housing stock.
- 4.5.4. The rate of repairs completed 'right first time' is also lower than comparator organisations but has significantly improved over recent years.
- 4.5.5. On income collection, whilst THH performs comparatively very well in terms of managing voids to minimise void loss, its performance in rent collection is generally below average. However, the relatively poor performance in rent collection metrics is at least partly related to the Southwark ruling on water rates. Until the situation is resolved, water rate arrears will obscure the true rent arrears performance.
- 4.5.6. Leaseholder charge collection presents a mixed picture with day-to-day service charge collection being strong, but major works recharge collection representing an area that THH could improve.
- 4.5.7. Overall, benchmarking suggests that THH is a generally well-performing housing manager, as evidenced by good satisfaction, ASB and void management metrics. There is room for improvement in some areas such as rent collection and repairs and it is encouraging that THH's performance across a number of metrics including 'right first time' repairs and satisfaction with major works, has improved over the last 2-3 years. THH is investing in its existing stock, although it is still behind peers with a relatively high percentage of non-decent housing stock.

## 5 | Value for Money

### 5.1. Introduction

- 5.1.1. In evaluating THH within the context of VfM we have considered benchmarking data, the strategic context and any specific projects undertaken by THH to ensure that it is delivering VfM.
- 5.1.2. We have reviewed HouseMark cost performance data for both THH's HouseMark peer group as well as the cost data of housing associations operating in Tower Hamlets. THH and HouseMark have very recently carried out a detailed benchmarking exercise, and we draw on this data as part of our analysis. The two organisations spent a considerable amount of time analysing cost accounts to ensure that costs were correctly categorised, which gives us confidence in the quality of the data.
- 5.1.3. THH's performance against key cost metrics is shown in the table below. Detailed discussion of THH's performance is organised into sections which look at cost drivers, areas delivering strong VfM, and areas for improvement.

Performance in key VfM metrics compared to peers (2017/18 Housemark data)

KPI Measure	Median	THH	THH Quartile
Office premises costs as % of direct revenue costs	2.1%	7.1%	Q4
Office premises costs per direct employee	£3,731	£8,402	Q4
IT costs as % of direct revenue costs	4.9%	7.6%	Q3
IT costs per direct employee	£8,338	£8,987	Q3
Finance costs as % of direct revenue costs	4.1%	4.1%	Median
Finance costs per direct employee	£4,613	£3,019	Q2
Central costs as % of direct revenue costs	8.2%	7.4%	Q2
Central costs per direct employee	£10,728	£5,438	Q1
Housing management CPP	£501	£501	Median
Tenancy management CPP	£137	£134	Q2
Resident involvement CPP	£63	£54	Q2
Lettings CPP	£42	£31	Q1
Major works (management) CPP <sup>9</sup>	£146	£184	Q3
Cyclical Maintenance (management) CPP	£77	£77	Median
Responsive Repairs (management) CPP	£224	£335	Q4
Void Works (management) CPP	£47	£65	Q4

<sup>9</sup> Metrics for repairs "(management)" are for the cost of managing the various elements of the repairs service.

## 5.2. Cost drivers

- 5.2.1. THH is funded through the payment of a management fee from the HRA. This fee is for the delivery of all services included in the management agreement, such as housing management, asset management, and responsive repairs and maintenance.
- 5.2.2. Outside of the management fee, THH also manages delegated budgets, the delegated cost budgets being principally for repairs and major works. Although the budget for the physical repairs is delegated, the cost of managing the repairs programme is an element of the management fee.
- 5.2.3. The 2017/18 management fee of £32m was a reduction on the previous year (£33.4m). An overall £2.76m saving across all budgets, offset by a £1.33m allowance for growth items, resulted in a net saving to the HRA of £1.4m. This was to be the first year of a five-year programme delivering savings of £6m in total (£2m in 2017/18, and £1m p.a. thereafter).
- 5.2.4. The 2018/19 business plan states that “significant budget pressures have been identified that result in an increase to the overall management fee compared with the base for 2017/18”. However, the 2018/19 management fee is almost £1m lower for 2018/19 (£30,979k compared to £31,946k for 2017/18), so the £1m savings to the management fee appear to have been identified despite these cost pressures.
- 5.2.5. The THH business plan identifies £1,001k savings in the 2018/19 business plan, being £746k from the management fee and £255k from delegated budgets. As referred to in 2.3.2 above, the Council needs to be clear about whether the savings targets relate to the management fee only, or to the entire HRA.
- 5.2.6. Some of the costs which THH incurs are recharges from LBTH via SLAs. These SLAs include legal services, IT and telephony, and formerly, office accommodation costs. THH has some negotiating input over certain SLAs, while over others it has little or no control (e.g. legal and IT costs). In some cases, THH has negotiated a related adjustment to the management fee. In the case of office accommodation costs, the SLA charge was considered to be so high that THH sought cheaper alternative accommodation.
- 5.2.7. We did not find evidence of substantial tracking of financial VfM KPI data. There is regular benchmark reporting of performance (income collection rates, re-let times, void rates, programme delivery progress, satisfaction scores) but not of the cost of delivering that performance. The recent HouseMark report is thus welcome and timely. While THH has been able to identify savings and has been carrying out service reviews across its functions, the lack of regular reporting of cost KPIs and/or cost benchmarking is an important gap in THH’s strategic approach to achieving VfM.
- 5.2.8. We are assured that scrutiny of budgets is applied via an experienced board and

from residents (on the Board and otherwise), but the inclusion of cost reporting would strengthen this function.

- 5.2.9. There are of course some areas of higher cost or weaker performance where there is still potential to achieve greater VfM – where THH’s performance is average, there is scope to improve. We note however that in an operating context where all ALMOs are seeking to make HRA cost savings, it is possible to deliver significant savings and still remain ‘average’. Benchmarking analysis therefore needs to be combined with trend analysis to assess improvement in performance over time, hence the need for regular, periodic cost KPI reporting.

### 5.3. Areas delivering strong VfM

- 5.3.1. Benchmarking indicates a generally positive picture in terms of THH’s current performance in providing VfM – costs are either broadly in line with the peer group or compare favourably. In areas where costs appear high, this is likely to be a reflection of the type of stock it manages and the high levels of deprivation in the areas in which it operates<sup>10</sup>.

#### Lettings

- 5.3.2. HouseMark data shows that THH are a top quartile performer across most measures of the lettings function, both in terms of performance (re-let times, void loss) and efficiency (cost per property and patch size). Although THH is in the bottom quartile for average employee cost (£43.2k, vs median £39.7k), this higher-cost team delivers above-average performance.

#### Resident involvement

- 5.3.3. HouseMark data shows that THH has a lower than average cost per property in this area. Although the average employee cost is above average (£45.7k vs median £42k), there are 1,333 properties per employee in this function, compared to a median of 1,190. Given THH’s high satisfaction ratings, we would again observe that this higher-cost team delivers above-average performance (as supported by our findings in the performance section 4 above).

#### Areas for improvement

- 5.3.4. As a general observation, THH’s KPI performance for overhead costs in the HouseMark benchmarking report tends to score better on a per-employee basis than when calculated per £ of direct expenditure, suggesting that THH is more heavily staffed than average. However, this is due in large part to the high number of caretakers (who are employees rather than contractors). Figures from comparators

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<sup>10</sup> 20% of THH households report an annual income of less than £15,000

may be impacted by contracting out such services (as LB Hammersmith and Fulham does, for example). Having a higher proportion of blocks (relative to street properties) may also increase the requirement for caretakers for THH.

#### Overhead costs – office premises costs

- 5.3.5. Office premises costs are far higher than average – 7.09% of direct revenue costs, compared to a median of 2.14% (a bottom quartile cost is in excess of 3.09%). The high costs reflected in the benchmarking are an SLA charge from LBTH. To reduce costs, THH has recently moved to a new office. This move is anticipated to generate net savings of £580k p.a. from 2018/19.
- 5.3.6. We have recalculated the benchmarking outturn figures for 2017/18 using revised £1.422m office accommodation costs, based on a full year of Boatman’s House office rent and service charge. This figure was provided by THH. The recalculation improves THH’s performance against the cost per employee and cost per direct employee benchmarks from fourth to third quartile.
- 5.3.7. However, even based on the forecast, office costs are 4.02% of direct revenue costs, and therefore remain above both the median and lower quartile mark. This may reflect the high cost of office space in the borough, and the comparator data will likely be influenced by some ALMOs who share office accommodation with their parent local authority. In any case, we understand that THH will be required to move again due to being served notice by the freeholder of their current building.

#### Responsive repair costs

- 5.3.8. The HouseMark data identifies that THH has slightly higher repairs costs than average, even when compared to peers in high deprivation areas. As noted in the performance section above, the driver appears to be a high number of repairs (6.15 per property pa, bottom of the peer group of 19, compared to a lower quartile figure of 4.62 and median of 3.73).
- 5.3.9. The cost of the repairs themselves (the cost per repair) is lower than average, which is suggestive of relatively efficient procurement. The HouseMark report also supports this interpretation, as it finds THH’s replacement costs for kitchens, bathrooms and boilers to be lower than average.
- 5.3.10. Given its 11,568 rental properties, THH is doing over 71,000 repairs a year whereas the 4<sup>th</sup> quartile provider only does 53,400 – at £131.81 per repair. Improving performance to the level of the 4<sup>th</sup> quartile would reduce the responsive repairs cost by £2.3m.
- 5.3.11. The high number of repairs per property is unlikely only to be explained by the

relatively low rate of first-time fixes (85.9% vs. median 88.9%)<sup>11</sup>. However, at a cost of £131.81 per repair, improving the first-time repair rate by 3% (to the median rate) could save £280,000. This would reduce the number of repairs requiring follow-up by 20% (2,000 fewer repairs a year, which is more than 5 a day).

- 5.3.12. The cost of managing the repairs service is also more expensive than average (total cost per property £335 vs median: £224, 4<sup>th</sup> quartile: £331). Reducing both the total number of repairs and the number of follow-up repairs could be expected to reduce management costs. We understand that THH are appointing a commercial manager to oversee the repairs contracts and particular to understand the reason for the high numbers of repairs. Investment in IT systems to introduce online repairs reporting are also expected, by THH to deliver savings in this area.

#### Service charges

- 5.3.13. Estate costs are high relative to THH's peers, but this is largely a result of the type of stock (mainly estates and blocks). Any savings in direct costs would be passed on to tenants and leaseholders – there is a benefit to residents in terms of lower bills, although this would not translate into benefits for the HRA.

#### 5.4. Areas of uncertainty

##### Overhead costs – central and finance costs

- 5.4.1. Central costs, together with finance, IT and office premises costs reflect THH's overheads. IT costs are higher than average, but this reflects an SLA recharge which includes the cost of the major IT transformation process currently under way.
- 5.4.2. THH's finance and central costs are lower than average, whether measured as a percentage of direct revenue costs or as a cost per employee. Unfortunately, this gives only a relative measure of performance since, for any given level of overheads, an organisation with a high-cost, heavily staffed front-line service would perform better under these measures. However, HouseMark described the finance function as 'lean' (indicating that the service review in this area has resulted in cost efficiencies), and central overheads as significantly lower than average.
- 5.4.3. We do not have the data to calculate a benchmark for cost per property. The central overhead cost allocated to the various front-line activities is above average on a cost per unit basis for maintenance but below average for housing management – we cannot determine whether the overheads per unit are above or below average overall.
- 5.4.4. The benchmarking performance of THH in terms of planned maintenance and major

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<sup>11</sup> Possible reasons for the high number of repairs per property are considered in paragraph 3.2.10.

repairs costs is likely to be obscured (for both 2017/18 and the next couple of years) by additional fire safety works and cladding removal/replacement in response to the Grenfell Tower disaster. This will affect some housing providers more than others, according to the nature and construction of their stock. LBTH has agreed to fund £6m of additional fire safety expenditure by THH, being £425k extra staffing costs and £5.6m works (including cladding removal).

## 5.5. Overall cost and VfM

- 5.5.1. There is scope to make improvements in a number of areas, and we see evidence that some of these are being addressed. Some improvements (e.g. mobile working) are dependent on IT upgrades, the timing of which may be outside THH's control. This affects the ability to deliver the savings within the timescales anticipated. Some costs (e.g. agency staff to fill vacant posts) are being carried pending service reviews to avoid the likely (higher) alternative costs of redundancies.
- 5.5.2. While the benchmarking indicates that THH is, in a number of areas, a relatively high-cost housing manager, given the areas in which it operates, its service performance levels and its levels of resident satisfaction, we do not find a compelling case for arguing that it offers poor value for money.

## 5.6. Views on VfM

- 5.6.1. THH's view of its own VfM position is that it has generated efficiency savings and is continuing to deliver improvements in VfM across its service delivery. However, once these improvements have been implemented, any significant further savings in expenditure are likely to come at the expense of service quality or delivery.
- 5.6.2. Both LBTH and THH consider that there is very little overlap in their activities or functions, suggesting that there would be only limited savings from transferring THH's activities back to the Council, and the possible impact on performance from the disruption caused by the transfer might negate such savings as were available. It would only take a very small increase in voids/bad debts to wipe out the limited savings anticipated – much smaller than the improvements already achieved. For example, a 0.1% reduction in income (whether through voids or bad debts) would negate a £90k cost saving.
- 5.6.3. We met a perception at LBTH that THH has not yet 'dug deep' and 'felt the cuts' in the same way that other council services have had to, implying a view that THH could do more to deliver VfM.
- 5.6.4. THH's reserves have been used to fund one-off projects such as the ICT digital strategy, procurement costs linked to capital works, works associated with the office move, and company restructure costs. Based on the 2018/19 budget, after these projects THH's reserves will be at the minimum agreed balance (£2.2m) and further one-off costs would have to be funded from savings in the current year.
- 5.6.5. There were also suggestions that: savings were offered by THH in the delegated budgets but not in the budgets covered by the management fee (as was expected by



some stakeholders as part of the £6m savings target); that savings were offered at the same time as requests for additional 'growth' funding, so the net saving to the HRA was less; and that THH requested additional LBTH funding for projects which should be funded from the management fee (e.g. senior management training). However, the planned £1m saving to the management fee has been identified for 2018/19.

- 5.6.6. Through the residents' focus groups, there appears to be a perception that the quality of service delivery has declined as a result of savings targets. One resident stated, "it is inevitable that the savings targets imposed by the Council will have a negative effect on some services". Another resident stated that "it seems to me that when services are restructured it is done with finances in mind, rather than service delivery." One particular example was the perception of there being fewer Neighbourhood Officers since a restructure in the summer of 2018.
- 5.6.7. Some residents also said that an improvement in some services, particularly ASB, was evident following additional investment by THH. Although the performance figures to date do not reflect this perceived improvement, we understand that, as premises closure orders are starting to come through, THH officers expect performance figures over the next year to reflect the impact of increased efforts to address ASB.

## 5.7. The Housing Revenue Account (HRA) – overall position

- 5.7.1. We have reviewed extracts of the HRA business plan as it stood at 29th October 2018 and as discussed with LBTH finance officers. The model had been updated to remove the Higher Value Voids levy but had yet to incorporate the lifting of the HRA debt cap, which had only just been announced.
- 5.7.2. The HRA balance is positive but forecast to remain at £10m until 2025/26. The revenue account is positive and there are large contributions to capital from reserves to fund the capital programme. The long-term HRA is growing its surplus even after significant contributions to capital.
- 5.7.3. The plan was constrained by the debt cap for the first 10 years, and after that point there remained limited headroom for the rest of the 35-year plan and little scope to repay debt.
- 5.7.4. There is a relatively cautious assumption that rents will increase at CPI after the 5 years at CPI+1% end. Costs are also assumed to grow at 2%. This may be an optimistic assumption in areas such as repairs unless the Council continues to deliver real year on year savings.
- 5.7.5. Interest costs in the plan are relatively high, but they reflect the historic lender's option, borrower's option (LOBO) loans taken out by LBTH prior to the self-financing regime and there is little scope to reduce this cost in the medium term.
- 5.7.6. The plan includes a 30-year stock condition survey forecast spend of £498m (before inflation), which is £43k per rented unit – this is at the upper end of our expected

range of values for large scale voluntary transfer (LSVT)-type stock, reflecting the large cost uplifts as a consequence of the stock which is in blocks. The plan includes the £6m additional costs for works post-Grenfell.

- 5.7.7. This expenditure can be afforded within the plan, but the timing of the expenditure needed reprofiling to remain within the debt cap. This should no longer be a constraint.
- 5.7.8. £104m of borrowing is currently assumed, mainly in 2019-21, in order to fund £319m of new build units. This is to maximise the use of Right to Buy (RtB) receipts of £206m over the next 3 years (2018/19-2020/21). A proportion of RtB receipts can be retained to spend on replacement social housing but these receipts cannot fund more than 30% of the total spend, cannot be used in conjunction with other GLA/Homes England funding and must be spent within 3 years or repaid with interest (or used to grant fund another body, e.g. an RP).
- 5.7.9. The higher LBTH's RtB receipts, the more it has to spend on replacement housing to retain the receipts (the new housing is funded by borrowing). The lifting of the debt cap increases LBTH's ability to borrow for new development, although the other limitations on the use of the receipts are still a constraint.
- 5.7.10. The HRA currently includes commercial property income, the transfer of which to the general fund is being considered. Savings in the HRA would be required to make good the loss of this income.

## 5.8. Key Findings

- 5.8.1. In terms of THH's cost performance, the high-level findings reflect mixed performance on value for money - strong cost efficiency in the lettings function, but a high-cost, high-volume responsive repairs service. Benchmarking indicates a generally positive picture in terms of THH's current performance in providing VfM – costs are either broadly in line with the peer group or compare favourably. There is scope to make improvements in a number of areas, and we see evidence that some of these are being addressed (e.g. contract management resourcing).
- 5.8.2. The 2017/18 management fee was a reduction on the previous year, reflecting £2.76m savings offset by a £1.33m allowance for growth items. This was to be the first year of a five-year programme delivering savings of £6m in total (£2m in 2017/18, and £1m p.a. thereafter). A further £1m saving in the total management fee was identified for 2018/19 despite additional resources for fire safety and SLA increases.
- 5.8.3. With the removal of the debt cap and the Higher Value Voids levy, the HRA medium-term business plan is now less constrained than in previous years. The plan assumes that cost growth can be contained to the level of general inflation, which may prove challenging to sustain over the longer term without continued efficiency improvements. However, long-term forecasts are inherently uncertain, particularly in a fast-changing policy environment.

- 5.8.4. We did not find evidence of substantial tracking of VfM cost KPI data. While THH has been able to identify savings and has been carrying out service reviews across its functions, the lack of regular reporting of cost KPIs and/or cost benchmarking is an important gap in THH's strategic approach to achieving VfM.

## 6 | Stakeholder Views

### 6.1. Introduction

- 6.1.1. The relationship that THH has with its sole shareholder and client/contract manager, LBTH, is key. The ALMO-Council relationship is codified through the management agreement (and service level agreements), but how it is enacted in practice can vary. In our experience a strong ALMO-Council relationship is a partnership in which there is strong strategic alignment, the ALMO is responsive to the needs of the Council, and the Council has a strong focus on what it requires of the ALMO and communicates and monitors this effectively.
- 6.1.2. To inform our findings in this section, we spoke to a range of stakeholders including tenants, leaseholders, the Mayor, LBTH officers, THH Board members, THH officers and external partners. We also undertook a residents' survey and a survey of THH board members.

### 6.2. ALMO governance and clienting structure

- 6.2.1. LBTH's client team is responsible for both the clienting of the ALMO and other retained landlord functions (including HRA land sales, policy development, RTB receipts and street property acquisition for Temporary Accommodation, amongst other areas). The client team's responsibilities with the ALMO include reviewing and feeding into the business plan each year, approving and providing administration for the capital programme and transformation plans, and managing the various SLAs that the ALMO has in place with the Council.
- 6.2.2. The client team has regular engagement, including monthly meetings, with ALMO officers in relation to performance reporting and leaseholder charges. Items from these meetings, along with a Capital Programmes group (attended by the Council's Capital Delivery Team), are often included in papers to bi-monthly operations ('Bi-Op') meeting chaired by LBTH's Divisional Director.
- 6.2.3. We understand that papers from the Bi-Op meeting are often taken to a Quarterly Strategic Meeting that is attended by largely the same people, with the addition of THH's Chief Executive and LBTH's Corporate Director of Place, who chairs the meeting. The Mayor's Housing Meeting is another meeting that occurs on a quarterly basis that is attended by the THH Chair but otherwise the same attendees as the Quarterly Strategic Meeting.
- 6.2.4. The Mayor's Housing Meetings are intended to help ensure that THH is aligned to, and delivering on, the Mayor's priorities. However, despite the strategic purpose of the meeting, it is our understanding that these meetings are briefings on performance and risk, in addition to a range of specific operational issues. Some stakeholders feel that there is often "not enough space" to discuss strategic issues.
- 6.2.5. We recommend that LBTH considers the purpose of the various bodies in the THH governance/engagement structure to ensure that the division of responsibilities,

delegations and terms for each are clear and fit for purpose.

- 6.2.6. Many stakeholders feel that the relationship between the Council and ALMO generally works well, pointing to effective working on a number of operational issues and good personal working relationships. A sense of having generally positive and constructive working relationships was widely held amongst stakeholders in both LBTH and THH.
- 6.2.7. However, some stakeholders feel that there is room to improve the relationship between the Council and ALMO and referred to the response of THH and LBTH in the wake of the Grenfell tragedy (checking Fire Risk Assessments and issuing communication to residents) and the recent move of THH to new offices (as a means to save costs on an SLA with the Council, and the impact that this had on the Council), as two particular points which exposed issues in the relationship between the two organisations.
- 6.2.8. Some stakeholders regard these particular issues as examples of robust but healthy and necessary challenge between the organisations. However, where issues have arisen in the past, in some cases, this has impacted on how some stakeholders view the relationship between LBTH and THH. Some of these stakeholders felt that there was a degree of mistrust and lack of clarity over delegations between LBTH and THH and that this contributed to the sense of a certain amount of unease in the relationship between the organisations.
- 6.2.9. The clienting relationship between LBTH and THH was characterised by LBTH staff that we spoke to as “arm’s-length” and one in which THH are allowed to “get on with it” with the Council intervention kept to a minimum. Some credited this approach to allowing THH to innovate and engage in transformation relatively free of the bureaucracy and politics of the Council.
- 6.2.10. However, others saw this approach as leading to a relationship where LBTH is not as assertive or clear as it should be in its clienting of the ALMO. Council officers recognise that there is some work to be done internally on the development of their clienting arrangements and pointed to instances of LBTH requesting the ALMO to produce reports or undertake work that is not always necessary, whilst not always producing required reports themselves.
- 6.2.11. Some stakeholders from the Council spoke of the need to ‘rebalance’ the relationship with the ALMO and to establish greater clarity of the roles and responsibilities of key bodies and stakeholders in the governance structure. Some stakeholders in both the ALMO and the Council expressed a desire to see a more formalised arrangement that reduced the current duplication (of meetings and papers) between LBTH and THH and made clearer the levels of delegation and authority for the ALMO to take action. We agree with these sentiments and see that greater clarity of roles would benefit both LBTH and THH.
- 6.2.12. From the evidence that we have gathered and the interviews and focus groups that we have undertaken, there appears, in some respects, to be a tension between THH’s desire to act independently in many regards and an understandable desire within LBTH to have greater control over the ALMO. We recommend that LBTH

looks to establish greater clarity in their expectations of the ALMO and define a common vision for the relationship with the ALMO, which would include greater clarity over delegations and authority to act. We recommend that both the Council and THH recognise that elements of the relationship will likely need to feel different to both organisations in the future.

### 6.3. Resident feedback

- 6.3.1. To inform this review, we asked residents for feedback through surveys (both online and telephone) and a short series of focus groups for both involved (e.g. Tenants and Residents Association (TRA) representatives) and previously uninvolved residents. These activities were designed to understand residents' views about THH's services and provide a qualitative dimension to the satisfaction data discussed in Section 4 above.
- 6.3.2. The online survey received over 780 responses and 300 residents took part in the telephone survey. This is a higher response than we have received when conducting similar reviews at other local authorities. The response rate and feedback received from resident stakeholders within the borough demonstrates the high level of interest and strength of feeling that many THH residents have when it comes to the management of the Council's homes.

#### Survey Feedback

- 6.3.3. When asked to rate the current housing management service, the survey results showed a significant gap between tenants and leaseholders. For every leaseholder who rated THH services positively, approximately two tenants rated THH services positively. For every tenant who rated THH services negatively, about four leaseholders rated services negatively.
- 6.3.4. The online survey reveals that tenants who rated the overall service positively are generally pleased with THH's tenancy and rents, repairs, caretaking and gardening services. Leaseholders who rated overall service positively are generally pleased with THH's caretaking, gardening and leaseholder services.
- 6.3.5. The online survey reveals that tenants who rated the overall service negatively were more likely to be displeased with THH's repairs, ASB and complaints services. Leaseholders who rated overall service negatively were more likely to be displeased with THH's repairs, major works, complaints and leaseholder services.
- 6.3.6. When asked about whether their housing management service had improved over time, the response from residents was mixed. Of the online survey respondents, about half of both groups said services have improved or stayed the same, whereas about a third of each group said services have got worse. The phone survey yielded slightly more positive results with about three-quarters of leaseholders and tenants saying that services had improved or stayed the same, and about a fifth saying that services had got worse. This should be seen in the context of the percentage of tenants rating the service as excellent, very good or good (according to LBTH's Annual Residents Survey) as having increased from 26% in 1999 to 55% in 2017.

## Focus Groups

- 6.3.7. Over three focus groups we met with twenty residents of THH, including both tenants and leaseholders, and both involved (TRA representatives) and previously uninvolved residents. A number of common themes emerged from our discussions with residents.
- 6.3.8. It was noted by a number of participants that several services have improved in recent years. Environmental Services and Fire Safety were highlighted as examples of services which have undergone a notable improvement; several residents were particularly impressed with THH's response to Grenfell and the resulting programme of block inspections (though it should be noted that some residents did not share this positive view). Some participants were aware of and welcomed the Fire Safety Working Group that THH had established with residents.
- 6.3.9. Caretaking services were highlighted as having been consistently good, largely due to the personable and committed staff. This was supported by the survey results which saw caretaking receive one of the most positive responses from both tenants and leaseholders.
- 6.3.10. ASB was recognised as an area that THH has not always performed well in, but that had seen recent improvements. There was a sense amongst many focus group participants that THH's response to ASB had improved as a result of more officers and greater investment in the service. Some residents shared concerns that there was a lack of effective joint working between LBTH and THH on ASB, citing examples of CCTV footage not being shared.
- 6.3.11. There were a number of areas that focus group participants felt they would like to see improved. Major works delivery was seen as a particular source of disappointment amongst residents in the focus groups. Many participants felt that current contractor monitoring and management arrangements are poor and that contractors frequently 'cut corners' when undertaking works. More assertive contract management was seen as necessary by many of the residents we spoke with.
- 6.3.12. Many participants' perception of THH was significantly influenced by historic experiences, that in many cases, had occurred several years ago. Historic and legacy issues with the Decent Homes works featured prominently in the residents' focus groups and were a source of frustration and disappointment for several residents we spoke with. It was felt by participants that many homes had not been raised to a decent standard, with low-quality materials used in kitchens and high levels of electrical trunking in properties.
- 6.3.13. Many residents felt that LBTH is as responsible as THH for the perceived problems with the Decent Homes works, citing a late application for funding by the Council and pressure on THH to procure the lowest cost contractors, regardless of quality. However, there was also a sense that THH continues to have problems with the procurement and management major works contractors. One resident stated, "it doesn't look like [THH] has learned any lessons from the difficulties they encountered during the Decent Homes programme".

- 6.3.14. Another consistently identified issue in the residents' focus groups was communication, both in terms of communication between THH and residents and contractors; and between different teams within THH.
- 6.3.15. Some residents described communication from THH, particularly with regards to income collection, as having a 'threatening tone'. We heard examples of letters sent to tenants demanding arrears be cleared, when in fact, there was no money owed on the account. We also heard examples of a lack of communication about major works, with examples of works that affected access to block entrances not being communicated to residents. Other residents gave examples which highlighted communication issues with contractors where contractors had attended a cancelled job.
- 6.3.16. Many participants perceived a lack of co-ordination and consistency across internal THH teams. One resident stated "one team will say one thing and another team will say another. It's impossible to get a straight answer over the phone".
- 6.3.17. Some participants related the poor communication between internal teams to a perceived high turnover of staff. There was a perception that THH has struggled to retain high-quality front-line staff. There was particular frustration about the call centre, with examples given of having to explain the same issue several times, often to different people. The perceived high proportion of short-term or agency staff was seen as counter-productive to address perceived skills gaps in THH.
- 6.3.18. While frustration with internal communication, the call centre and high staff turnover was prevalent in the focus groups, many participants were very positive about individual THH staff members.
- 6.3.19. It is worth noting that feedback from THH board members suggests that the ALMO is aware of its challenges and the poor perception it has amongst some residents in regard to communication. THH board members claimed that its responsiveness to tenants is improving and referred to how residents' views have shaped the Business Plan and priorities for improvement projects.
- 6.3.20. Some of the focus group participants had very negative views about THH and the quality of service that it provides. The issues raised that were common across more than one workshop have been included above. However, it is worth noting that many of the most critical residents involved in the focus groups, remarked that they considered THH as the best social housing manager in the borough. The sentiment expressed by those residents was that THH was the "best of a bad bunch".

#### 6.4. Councillor feedback

- 6.4.1. Councillors representing wards with THH managed stock were invited to attend focus groups. We spoke to seven Councillors from across the borough who provided feedback based on their experience of THH and feedback that they have received from residents of their wards.
- 6.4.2. Councillors who participated in the focus group were positive about THH's record on



community development and engagement. Councillor's also praised the ALMO's approach to tackling ASB, including their work with Streets of Growth. It was felt that there is still room for development, but that ASB services are good.

- 6.4.3. THH was described as responsive to communication from Councillors. A common view amongst the focus group participants was that THH is more responsive than other housing associations in the borough, who were described as "more remote". This sense of good communication with THH extended to the ALMO's senior leadership, which was seen as accessible.
- 6.4.4. However, when it comes to communication with residents, Councillors gave a more mixed picture. Echoing comments from the resident focus groups, some councillors described some letters received by residents as 'threatening' in tone and gave other examples of letters that contained inaccurate information about rent accounts.
- 6.4.5. Communication about capital works was a particular area that councillors felt could improve, citing examples of a lack of information about the reasons for some capital works and poor communication with residents about delays to works.
- 6.4.6. Capital works delivery itself was described as a source of concern for some of the participants. Examples given included scaffolding being erected long before works commenced, delays to capital works, and long-standing issues with rainwater drainage.

## 6.5. External stakeholder feedback

- 6.5.1. We spoke to three external partners including an ASB partner, a training and development organisation, and the police.
- 6.5.2. The partners we spoke to describe their relationship with THH as positive and mutually beneficial. One interviewee stated that "our experience with THH has been one of our best partnership experiences – the people we have linked with, from the CEO down to the staff, have been willing to listen and be different." The ALMO was described as being very supportive of its local community partners, with staff accessible and easy to communicate with.
- 6.5.3. Interviewees were able to evidence the results of their partnership working, with one stating that in 2017/18 they saw a 48% reduction in reported ASB among young people on the three main estates where their organisation is working in partnership with THH.
- 6.5.4. It was acknowledged by interviewees that there are some challenges in the working relationship; for example, working across multiple teams within THH was described as "occasionally challenging", and that the level of engagement with community partners tends to ebb and flow over time depending on the political climate. However, in general terms interviewees held very positive views of the ALMO and its approach to partnership working.

## 6.6. Key findings

- 6.6.1. The current clienting and governance arrangements between LBTH and THH are regarded by many stakeholders as lacking clarity and suffering from duplication of meetings (with the same / similar attendees) and reporting. There is a common desire to have greater clarity and formalisation of roles, and responsibilities, and delegations in the relationship between the ALMO and the Council.
- 6.6.2. There appears to be a tension between THH's desire to act independently in many regards and an understandable desire within LBTH to have greater control over the ALMO. Greater clarity in LBTH's expectations of the ALMO and a common vision for the relationship with the ALMO, would benefit both organisations.
- 6.6.3. Residents expressed positive feedback for caretaking and fire safety and acknowledged progress that was being made with regards to ASB. Residents saw major works and management of contractors as particular areas for improvement for THH. Communication was identified as a key area for improvement in resident focus groups. Residents felt that communication between teams within THH, with the Council, and with residents should improve.
- 6.6.4. We found the perception of some participants to be significantly influenced by historic experiences, that in many cases, occurred several years ago. Historic and legacy issues with Decent Homes works featured prominently in our discussions with residents and were a source of frustration and disappointment for several residents we spoke with.

## 7 | Summary: THH as a Housing Manager

- 7.1.1. Performance benchmarking suggests that THH is a generally well-performing housing manager, as evidenced by good satisfaction, ASB and void management metrics. There is room for improvement in some areas such as income collection and repairs and it is encouraging that THH's performance across a number of metrics including 'right first time' repairs and satisfaction with major works, has improved over the last two to three years. THH is investing in its existing stock, although it is still behind peers with a relatively high percentage of non-decent housing stock.
- 7.1.2. In terms of THH's cost performance, the high-level findings reflect mixed performance on value for money - strong cost efficiency in the lettings function, but a high cost, high volume responsive repairs service. There is scope to make improvements in a number of areas, and we see evidence that some of these are being addressed (e.g. contract management resourcing).
- 7.1.3. Benchmarking indicates a generally positive picture in terms of THH's current performance in providing VfM – costs are either broadly in line with the peer group or compare favourably. In areas where costs appear high, this is likely to be a reflection of the type of stock it manages and the high levels of deprivation in the areas in which it operates.
- 7.1.4. The current clienting and governance arrangements between LBTH and THH are regarded by many stakeholders as lacking clarity and suffering from duplication of meetings (with the same attendees) and reporting. There is a common desire to have greater clarity and formalisation of roles, and responsibilities, and delegations in the relationship between the ALMO and the Council.
- 7.1.5. Overall, our assessment is that THH is a generally well-performing housing manager in terms of both housing management performance and cost. There is room for improvement in some key areas of service delivery but evidence of performance improvements over recent years and an extensive transformation programme currently being delivered, are positive.
- 7.1.6. THH continues to operate under the legacy of a troubled delivery of Decent Homes, which is likely to remain an operational challenge for THH in terms of repairs and major works, and a reputational challenge with some residents. There are also challenges for both THH and LBTH in the relationship between the two organisations, which would benefit from more clarity of delegations, roles and expectations, and from greater capacity for strategic discussion and alignment between the Council and the ALMO.

## Stage 2: Options Assessment

- 7.1.7. The purpose of Stage 2 was to consider the options available to LBTH for the future of the management of its social housing stock.
- 7.1.8. The options have been developed by consideration of operating models used by other Local Authorities, our understanding of the context for LBTH and THH explored through Stage 1 of this project, and LBTH's key long-term strategic objective of providing the best possible and continuously improving housing service to residents, securing fire safety, maintaining and improving the Council's physical assets, and enhancing the Council's reputation.
- 7.1.9. We have undertaken an analysis of the suitability, feasibility and acceptability of each option..
- 7.1.10. The five options are:
- **In-house Management:** Bring all THH services back in-house in 2020.
  - **Management Agreement Extension:** Extend the existing management agreement with THH remaining largely 'as-is'.
  - **Extension with Fewer Services:** This option would involve extending the management agreement for THH, but with the transfer of some services and functions from the ALMO to the Council (thereby making THH a 'thinner' ALMO).
  - **Extension with More Services:** This option would involve extending the management agreement for THH, but with the transfer of some services and functions from the Council to the ALMO.
  - **Extension with a Different Mix of Services:** This option would involve extending the management agreement for THH, but with the transfer of some services and functions from the ALMO to the Council and also simultaneously the transfer of some services and functions from the Council to the ALMO.

## 8 | Overview of Housing Management Approaches

### 8.1. Affordable Housing Management Models

- 8.1.1. Affordable housing has its origins in nineteenth-century philanthropic movements, characterised by the homes built by Joseph Rowntree, George Cadbury and George Peabody in response to industrial slums. From the early twentieth century a legal duty was placed on local councils to provide housing, with the post-WWII era seeing significant building by Local Authorities. Most early affordable housing was managed by Local Authorities but, following legislative changes since the 1970s, housing associations played an increasingly important role in housing management in the UK, which has accelerated since the 1980s.
- 8.1.2. For Local Authorities who became stock-owning during large building programmes, the question of how this stock should be managed has continued to be solved in different ways across the UK. From the 1990s, Large Scale Voluntary Transfers (LSVTs) of stock to newly-created (or in some cases existing) housing associations created new independent housing managers (e.g. Bolton at Home and Watford Community Housing Trust).
- 8.1.3. The early 2000s saw the introduction of another housing management model, the Arm's Length Management Organisation (ALMO). Many Local Authorities which did not pursue stock transfers sought to secure government funding for investment in their stock through the creation of an ALMO. ALMOs were able to apply for government grants that were unavailable to Local Authorities.
- 8.1.4. Many Local Authorities have retained their ALMOs who have continued to manage their parent authority's stock. Other Local Authorities who created ALMOs to access funding have dissolved them and brought the management function back within the council as the applicable funding streams ceased.

### 8.2. In House Council Housing Management

- 8.2.1. The in-house management model is where housing services are managed by the Local Authority. This may be because the council chose not to create an ALMO, or because an ALMO has been brought in-house. Around 100 Local Authorities in England still own and manage their stock. Combined, they provide housing management services for c.800,000 homes<sup>12</sup>.
- 8.2.2. Examples of councils which have brought their housing management function in-house after previously having an ALMO include the London Borough of Brent, London Borough of Ealing and London Borough of Hackney.

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<sup>12</sup> Association of Retained Council Housing

8.2.3. Councils that have retained both the ownership and management of their stock include the London Borough of Camden and Cambridge City Council whose tenants voted against the formation of an ALMO or stock transfer.

### 8.3. ALMOs

8.3.1. The option of establishing an ALMO to deliver ‘Decent Homes’ by 2010 was set out in 2000 by the then-Labour government in the green paper ‘Quality and Choice: A Decent Home for All’. One of the three housing management options proposed by the government to access extra Decent Homes funding, the ALMO model was adopted by Local Authorities who wanted to retain ownership of their social housing stock.

8.3.2. ALMOs are described as belonging to one of six rounds, depending on when they were created, and therefore what round of Decent Homes funding they first accessed. The table below shows when each round occurred. THH is a ‘Round Six’ ALMO, being one of the last to be established.

ALMO Round by Year

ALMO Round	Year
Round One	2002
Round Two	2002-03
Round Three	2004
Round Four	2004-05
Round Five	2005-06
Round Six	2006-08

In 2009 the Government diverted funding away from social housing stock improvement to new homes development, and in 2010, the Decent Homes Programme ended. The number of ALMOs operating in England has steadily decreased since 2009. Many ALMOs have either been brought back in-house by their Local Authority or have been converted into a stock transfer housing association.

Number of ALMOs and stock managed by ALMOs in England and London 2009-2018

		2009/10	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
London	# of ALMOs	20	15	13	13	11	8	8	6	5
	Homes managed	c. 268k	c. 253k	c. 238k	c. 238k	c. 206k	c. 128k	c.128k	c.105k	c. 84k
England	# of ALMOs	70	55	50	47	42	38	37	33	31
	Homes managed	c.1m	c.800k	c.700k	c.650k	c.600k	c.510k	c.500k	c.440k	c.420k

8.3.3. In London, fifteen ALMOs existed in 2011. As illustrated in the table below, this

figure has decreased to five in the present day. Many councils claimed that the end of the Decent Homes Programme meant that their ALMOs had served their purpose and did not deliver sufficient benefits above in-house council management.

Council Stock Management in London (ALMOs) 2011-2018

London ALMOs	11 / 12	12 / 13	13 / 14	14 / 15	15 / 16	16 / 17	17 / 18	18 / 19	19 / 20	
Ascham Homes	ALMO				In-House					
Barnet Homes	ALMO									
Brent HP	ALMO						In-House			
CityWest Homes	ALMO								In-House	
Enfield Homes	ALMO			In-House						
Hackney Homes	ALMO				In-House					
Homes for Haringey	ALMO									
Homes for Islington	ALMO	In-House								
Homes in Havering	ALMO	In-House								
Hounslow Homes	ALMO			In-House						
Ken & Chelsea TMO	ALMO						In-House			
Lambeth Living	ALMO				In-House					
Lewisham Homes	ALMO									
Sutton HP	ALMO									
Tower Hamlets Homes	ALMO									

#### 8.4. Themes in Stock Options Reviews

8.4.1. Local authorities with an ALMO periodically review and renew their housing management agreements, which often run for ten-year terms with five-year break clauses. As seen from the previous section, a number of Local Authorities have recently reviewed their housing management agreements and have decided to bring the services in-house; however, there are also instances where housing management reviews have resulted in the decision to retain and in some instances expand the role of the ALMO.

8.4.2. It is often the case that an ALMO's perceived poor performance is a catalyst for a Local Authority's housing stock options review – however, well-performing ALMOs have also had their management agreements ended. It is worth acknowledging that ALMOs with a poor relationship with their parent authority are rarely retained; on the other hand, those ALMOs with positive working relationships with the authority are often in a good position for the renewal of their housing management agreement. This is the case for Lewisham Homes, whose relationship with the London Borough of Lewisham is characterised by healthy amounts of trust and challenge. Details of this relationship are contained in a Lewisham Homes case study in Appendix 2.

8.4.3. In some cases, the Local Authority may have political motivations to bring the ALMO in-house. This may be due to a political view on the role of outsourcing in service delivery, or due to local political pressure, for example from dissatisfied residents. While the political motive can be driven by poor ALMO performance, this is not

always the case. We have found that it is usually the case that the absence of political desire by the parent authority to maintain their ALMO, and no financial imperative to the contrary, will result in the ALMO being brought in-house.

## 8.5. The Changing Role of ALMOs

- 8.5.1. While more than 40 ALMOs have been closed in recent years, there have also been some new additions to the ALMO ranks. Several ALMOs have been created in the post-Decent Homes era since 2010. One of the recent additions is Shropshire Towns and Rural Housing, which manages all of the 4,200 Shropshire Council-owned homes in the Oswestry and Bridgnorth areas. The ALMO was set up as part of the Council's drive to find efficiencies. The Council had been assessing the value for money provided by its services and found that housing management was best delivered outside of the Council.
- 8.5.2. Cornwall Housing is a larger ALMO which was set up in 2012 after Cornwall Council became responsible for landlord services from the three former district councils in the area. Cornwall Housing manages over 10,000 council houses and is an asset-owning company with over 50 homes it has developed itself.
- 8.5.3. There are also instances where the ALMO model has been expanded to include housing management services run on behalf of multiple Local Authorities. East Kent Housing is England's first 'super ALMO'. It manages 17,500 homes and is providing housing services across four Local Authorities in Kent. Set up to achieve savings through shared service agreements, East Kent Housing has a 30-year contract with the four stock-owning councils.
- 8.5.4. Alongside brand new ALMOs, several Local Authorities have renewed or altered the management agreement with their ALMO, resulting in some significant additional service areas and work streams for ALMOs and the creation of 'diversified' ALMOs. While ALMOs have primarily provided housing management services, many councils have handed over services such as homelessness and housing options (Nottingham City Homes), private sector lettings (Homes for Haringey) and even street cleaning (South Tyneside). A number of these 'diversified' ALMOs are also branching out to provide services to third parties. For example, Barnet Homes has become part of a newly-created ALMO group 'The Barnet Group' which has taken on areas of Adult Social Care service delivery from the London Borough of Barnet. Case studies for Barnet Homes, Homes for Haringey and Nottingham City Homes are included in Appendix 3.
- 8.5.5. Despite these changes to the role that ALMOs are playing, some ALMOs remain 'thin'. A 'thin' ALMO focusses principally on delivering HRA services, including tenancy management and sustainment, and property management. A thin ALMO may also include the HRA housing development function. Examples of thin ALMOs include Lewisham Homes and Sutton Housing Partnership. We would consider THH a 'thin' ALMO. More information about 'thin' ALMOs is contained in Appendix 4.



## 9 | Option 1: In-House Management

### 9.1. Introduction

- 9.1.1. For LBTH the in-house option represents the most significant change from the status quo, with impacts on the structures, processes and ways of working at the Council. The implication for THH, is that it would cease to exist and the services it provides would be brought back into LBTH in 2020.
- 9.1.2. This chapter provides a high-level overview of the likely implications of choosing to bring THH in-house. As with all options reviewed, were LBTH to pursue this model an assessment and business case would need to be developed.

### 9.2. The Context for LBTH

- 9.2.1. The option under consideration, as per the scope of this review, is of the housing management service being brought in-house in 2020. This is due to the current management agreement between LBTH and THH expiring in July 2020.
- 9.2.2. Separate to the ALMO review, LBTH already has plans to bring the refuse collection service in-house to be delivered by the Council in 2020. The decision to bring the service in-house primarily follows the expiration of the current contract with Veolia and an assessment of the future options which found that the service could be delivered in-house with no additional cost. The evaluation did not show that there would necessarily be an improvement in services or cost savings generated.
- 9.2.3. LBTH is also in the process of a significant internal transformation programme. The 2022 Blueprint sets out LBTH's aims to be a dynamic, outcomes-based organisation using digital innovation and partnership working to respond to the Borough's changing needs. It includes transformation in seven key "S" areas, including:
  - Strategy: A new strategic plan will be underpinned by a core set of strategies in ICT, People and Customer and will look to insight, intelligence and horizon scanning to interpret a changing landscape
  - Structure: There will be a reduction in budgeted establishment including reduced management layers and a cross-skilled matrix workforce
  - Systems: LBTH will implement cloud-based solutions to lower infrastructure costs, enable agile working and create a repository for information that can be used for insight and intelligence
  - Staff/Workers: There should be improved customer satisfaction and a high level of staff engagement. LBTH will invest in its people and will work towards employee self-service.
  - Skills: LBTH will promote active and independent learning and will encourage multi-skilled workers, progression and business continuity.

- Shared Values: TOWER values will be embedded throughout the organisation in policies, processes and people
  - Style: The desk to staff ratio will be 1:2, Office 365 will enable agile working and leaders will lead by example, collaborate and promote core values.
- 9.2.4. In addition, LBTH is due to move its office accommodation to the new Town Hall building in Whitechapel. The Whitechapel Civic Centre will bring LBTH, THH and other partners such as those in healthcare together to form a central hub in the community. It is estimated that £78m will be made from the sale of old council buildings, which will go towards the £105m total project costs of the new Civic Centre. The move is due to take place in 2022 and, if the ALMO is retained, will see the integration of THH staff and systems into the new shared office environment.
- 9.2.5. Both the transfer of responsibility for refuse collection to an in-house function and the delivery of the Council's internal transformation programme are significant activities that will require resource within LBTH to be delivered successfully. These activities may therefore limit the available capacity in LBTH to manage a successful transition of housing management services from the ALMO into the Council in the same time period.
- 9.2.6. While LBTH may be able to deliver a successful transfer of the ALMO's services back in-house in 2020 alongside the refuse collection and transformation programme, these other activities will bring additional risk to loss of service quality and loss of the potential financial benefits of in-sourcing. Even without the transformation programme and refuse collection changes, 2020 may be too challenging a target date for bringing the ALMO in-house, given the necessary preparation and processes to successfully transfer the service.
- 9.2.7. If LBTH were to bring THH in-house, delaying the date for this transfer until LBTH has successfully completed the changes to refuse collection and the transformation programme would help to reduce these risks. If LBTH were minded to bring the ALMO in-house, it may be more suitable to do so following the move to the new Civic Centre in 2022 and the associated integration of some LBTH and THH back-office systems and processes.

### 9.3. Financial Implications

- 9.3.1. Bringing an ALMO in-house requires initial investment to cover expenses related to office moves, rebranding and communication, legal costs for license / contract commuting, and redundancies (potentially in both the ALMO and Council).
- 9.3.2. However, the case has been made that bringing an ALMO back in-house can result in long-term cost savings, which can off-set the initial costs. The principal areas that are targeted for long-term cost reductions are:
- Executive staffing costs
  - Office accommodation costs
  - Clienting costs

- Board / governance costs
  - Business support / corporate services / 'back-office' costs
- 9.3.3. If provision of housing management were to return to an in-house council service, we would expect the senior management structure for THH to be rationalised to fit within LBTH's management structure. The actual structure would be a matter for detailed consideration and hence the potential savings to staff costs cannot be outlined at this stage. Typically, returning ALMOs target savings of between £200-400k per annum as a result of executive management rationalisation. This is highly dependent on how the housing service is integrated into the parent council's existing management structure. It's also worth noting that any annual savings to senior management staffing costs is preceded by significant redundancy costs.
- 9.3.4. Although there would be savings in clienting and board costs, the THH board would be replaced by the consideration of housing issues at full council, executive and other committees. Savings made by the loss of a clienting function, would likely be somewhat offset by the additional time council officers would need to spend on the housing service.
- 9.3.5. Another common area where potential savings can be made is in office accommodation. However, the cost reductions associated with sharing office space do not require the ALMO to be brought back in-house. We understand that Therefore we would not expect to see further savings in office space rationalisation from bringing the ALMO in-house.
- 9.3.6. Based on our discussions with stakeholders, both LBTH and THH consider that there is very little overlap in their activities or functions, particularly in regard to 'back-office' functions such as finance, HR and IT<sup>13</sup>. This suggests that there would be only limited savings from transferring THH's activities back to the council.
- 9.3.7. The lack of obvious duplication or overlap in these commonly targeted functions increases the risk that the possible impact on performance from the disruption caused by the transfer might negate any perceived savings available. It would only take a very small decline in service performance, for example, an increase in voids/bad debts to wipe out the limited potential savings described above – much smaller than the improvements already achieved. For example. a 0.1% reduction in income (whether through voids or bad debts) would negate £90k of any cost saving made.
- 9.3.8. However, through combining services currently delivered separately by LBTH and THH there may be scope to achieve efficiency savings in some operational areas. Stage One of this review found that THH has a high-performing, if relatively high-

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<sup>13</sup> We understand that there is very little overlap in the finance functions in the two organisations, and that IT support is provided to THH by LBTH through a service level agreement.

cost ASB service. We understand that LBTH's ASB service is similarly high-cost. Therefore, there may be an opportunity to achieve cost-savings through combining the ASB functions of LBTH and THH. This could be achieved through bringing the ALMO back in-house, however, it could also be achieved through transferring THH's ASB service to the Council or the Council's ASB service to THH. These options are explored further in Sections 4 and 5 below.

- 9.3.9. More detailed work would be needed on the potential savings that would arise if LBTH decided to pursue bringing the ALMO back in-house. Some councils have achieved savings, but others have not reported on the financial impact of bringing the service in-house. Research in the housing association sector suggests that planned savings on mergers are often not realised; this would be a risk for LBTH.
- 9.3.10. When Enfield Homes was reintegrated, the Council reported efficiency savings due to consistency of services. One year after the service was brought in-house, revenue cost savings of approximately £1m p.a. were reported by the Council; whether this was revenue cost reduction or net of implementation costs is not clear. One example of these cost savings due to joined-up services included grass verges on estates being kept in the same way as highway verges.
- 9.3.11. When Lambeth Living was reintegrated back into the Council, the Council listed financial savings as one of the benefits of bringing the service in-house. The Council promised to re-invest these savings into housing services - any savings achieved have not been reported on. A case study about Lambeth Living is included in Appendix 3.
- 9.3.12. In-housing council housing management often lacks the transparency on both performance and value for money metrics that is required of ALMOs by their parent Authorities. If LBTH were to bring THH's services in-house, it should consider how it can measure and report on the impact on both services and costs of the transfer.

#### 9.4. Legal Implications

- 9.4.1. The current management agreement shall expire on 7th July 2020 unless extended or subject to earlier termination. If there is no extension agreed it expires on the 12th anniversary date. Under the agreement if LBTH wishes to extend the agreement for one or more further periods of up to five years they can do so by giving no later than 6 calendar months' notice before the date on which the Agreement would otherwise expire.
- 9.4.2. Regardless of the dates, if the parties are in agreement, they can negotiate an extension of the current agreement (subject to any agreed amendments) now if that is what both parties want.
- 9.4.3. If the Agreement is not extended and/or LBTH wishes at a later stage to terminate it, it can do so under Clause 65 if the ALMO or if a director commits one of a set number of breaches including: "A material breach of any of the Organisation's obligations under the Agreement or commits a breach of any of the Organisation's

obligations under the Agreement which is not capable of being remedied"<sup>14</sup>.

9.4.4. Other causes entitling LBTH to terminate the Agreement early include:

- Significant structural changes in staffing
- A director or senior manager being convicted of dishonesty
- Various actions by creditors under insolvency legislation
- Significant delay.

## 9.5. Consultation / Communications Implications

9.5.1. Under Section 105 Housing Act 1985, Local Authorities are required "to maintain such arrangements as it considers appropriate" with "its secure tenants" who are likely to be "substantially affected by a matter of housing management". Section 105 adds "the authority shall, before making any decision on the matter, consider any representations made to it in accordance with those arrangements".

9.5.2. Paragraph 3.7 of the paper supporting the extension of the additional two years notes: "The DCLG recognises the ballot as the preferred mechanism for the majority of authorities in testing their tenants' opinions in respect of changes to management arrangements; it is not a legal requirement". The paper further notes in paragraph 3.8: "However, a wider consultation with residents on how they view the housing services should be delivered will be conducted before the Management Agreement expires in 2020 (should the extension be agreed)".

9.5.3. If LBTH were to pursue in-house management, it would need to complete consultation with all relevant stakeholders. The method of consultation varies from organisation to organisation and LBTH would need to be able to prove that the outcomes represent a statistically valid response. There is no legal requirement to conduct a ballot.

9.5.4. By section 137 Housing Act 1996, "every body which lets dwelling-houses under secure tenancies" is required to publish information "in simple terms" as to the effect of such agreements. There are also similar obligations to consult and publish information under the Localism Act 2011. This means that LBTH would need to ensure there is a full and complete consultation process with all key stakeholders. Failure to consult effectively could expose LBTH to judicial review.

## 9.6. Clienting and Governance Implications

9.6.1. In this option, THH would cease to exist, and therefore the functions of the THH

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<sup>14</sup> Please note, a "*material breach*" or any other breach not capable of remedy. A "*material breach*" is not defined; but is generally considered to be one that goes to the heart of the Agreement.

board would be replaced by the consideration of housing issues at full council, executive and other committees.

- 9.6.2. Consideration should be given to the succession of bodies such as the THH board and the Residents' Panel, and how resident engagement and scrutiny can continue to be delivered, if the ALMO is brought back in-house.
- 9.6.3. Brent Housing Partnership engaged with tenants at multiple levels of their governance structure, including through resident board members, a board scrutiny panel and a resident readers panel.<sup>15</sup> Before reintegration, the ALMO had six residents on its board. Following the reintegration of housing services in Brent, the Council has developed its own resident engagement strategy including inviting residents to review services and join scrutiny panels. Brent Council is currently forming a volunteer Customer Experience Panel which will bring together twelve residents to focus on tenant issues and scrutiny.<sup>16</sup> The Panel will report to the Council's Executive Management Team.
- 9.6.4. LB Lambeth is currently working with the Tenants' Council and Leaseholders' Council to rearrange their resident engagement structure. The new changes seek to widen the engagement process and enable more to be facilitated online. Current structures include the Lambeth 500+, an online consultative platform designed to engage with residents as well as TRAs, Area Boards, a once per-annum resident assembly and task and finish groups. More information about LB Brent and LB Lambeth's ALMO reviews is found in Appendix 1.
- 9.6.5. Another impact of bringing the housing service in-house would be that the current clienting function within LBTH would also cease to be required in the same way. However, it is often the case that the resource requirement of the former client team is still required to continue to compile performance reports and support policy and strategy development for the in-house housing function. Again, the clienting function would need to be the subject of a discrete appraisal should the Council decide to bring the ALMO in-house.

## 9.7. Risk

- 9.7.1. The most significant financial risk with this option is failure to achieve savings that justify the effort required to successfully bring the housing service in-house. Given the relatively low level of overlap of functions between THH and LBTH, the expected cost savings from job posts alone is not likely to be significant. Therefore, the risk of failing to achieve meaningful cost savings is higher than for other ALMOs where there is greater evidence of overlap or duplication of roles and functions.
- 9.7.2. The major operational risk is that the benefits of a single purpose, tenant-focussed

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<sup>15</sup> Brent Housing Partnership 2014 Annual Report

<sup>16</sup> LB Brent Your Voice Magazine Summer 2018

organisation would be lost which could lead to a deterioration in service delivery standards and a consequent decline in tenant satisfaction. This risk certainly applies to THH which has seen improvements in a number of its service areas over the last 2-3 years as a result of an organisation-wide focussed service improvement programme.

## 9.8. SWOT

9.8.1. Here we record the strengths, weaknesses, opportunities and threats of this option.

Strengths	Weaknesses
<ul style="list-style-type: none"> <li>▪ May encourage closer working between housing and other council departments</li> <li>▪ May help to ensure delivery of LBTH's strategic objectives through having direct control of the housing management function</li> </ul>	<ul style="list-style-type: none"> <li>▪ Cost of transferring the service in-house</li> <li>▪ Dilution of cultural and organisational focus on housing (including loss of a dedicated board)</li> </ul>
Opportunities	Threats
<ul style="list-style-type: none"> <li>▪ Opportunity to improve efficiency and reduce costs in some areas through rationalising governance structure and some operational functions</li> <li>▪ Opportunity to bring housing into LBTH's wider transformation programme</li> <li>▪ Opportunity to integrate good ways of working in THH into related functions in LBTH</li> <li>▪ May create more opportunities for staff to move within and between the newly created housing department and other Council areas</li> </ul>	<ul style="list-style-type: none"> <li>▪ LBTH is bringing the refuse collection service in-house in 2020. This may negatively impact the Council's capacity to transfer the housing service whilst maintaining current service quality</li> <li>▪ Potential loss of formal governance and scrutiny structures that residents can currently be involved in</li> <li>▪ Potential to disrupt THH's existing service improvement and transformation programmes leading to failure to deliver benefits from those activities</li> <li>▪ Potential loss of performance culture and reduced scrutiny may lead to a reduction in performance</li> <li>▪ Risk that anticipated cost savings are not achieved. (See "Homes for Haringey" in Appendix 3)</li> <li>▪ Risk of reduced staff morale within the housing service.</li> </ul>



## 10 | Option 2: Management Agreement Extension

### 10.1. Introduction

- 10.1.1. Being largely focused on the delivery of housing management and related services within the HRA, THH can be described as a 'thin' ALMO. Although specialist services provided by THH (such as domestic violence support, money management support and resident employment training) were once considered as falling outside the scope of a thin ALMO, it is becoming more common for thin ALMOs to offer these services today.
- 10.1.2. This option represents a continuation of the status quo that would result from an extension of the existing management agreement.

### 10.2. Financial Implications

- 10.2.1. As extending the existing management agreement is essentially a continuation of the status quo, there would be no particular financial implications of adopting this option.
- 10.2.2. As covered in Section 5.8 of Part One of this report, the HRA balance and revenue account is positive and there are large contributions to capital from reserves to fund the capital programme. The long-term HRA is growing its surplus even after significant contributions to capital. The HRA medium-term business plan is now less constrained than in previous years due to the removal of the debt cap and the Higher Value Voids levy.
- 10.2.3. THH is currently delivering savings against a target set by LBTH to achieve a cost reduction of £6m over five years from 2017 (£2m in 2017/18, and £1m p.a. thereafter). Retaining the ALMO by extending the current management agreement will enable THH to continue to deliver savings for the remainder of the cost-saving target period of 2017/18 – 2021/22. If LBTH decides to extend the existing management agreement, it should consider whether to also extend the savings target, subject to an appropriate scoping exercise.

### 10.3. Legal Implications

- 10.3.1. If LBTH simply wishes to further extend the agreement, we believe it can do so by way of negotiation and consultation. It may be that a new agreement is required albeit on the same or similar terms as this agreement.
- 10.3.2. Clause 62.2 of the management agreement confirms "The Council shall be entitled (without any obligations whatsoever) to extend the term for one or more further periods of up to five years ... by giving notice to this effect to the organisation no later than six calendar months before the date on which the Agreement would otherwise expire pursuant to Clause 62.1".

## 10.4. Consultation / Communications Implications

10.4.1. As with the in-house management option, under Section 105 Housing Act 1985, “the authority shall, before making any decision on the matter, consider any representations made to it in accordance with those arrangements”. Therefore, if LBTH wishes to retain THH by extending the existing management agreement, we would recommend that LBTH shares the rationale for its provisional decision and consult relevant stakeholders.

## 10.5. SWOT

10.5.1. Here we record the strengths, weaknesses, opportunities and threats of this option.

Strengths	Weaknesses
<ul style="list-style-type: none"> <li>▪ THH has delivered improvements against performance indicators and cost reduction targets in recent years</li> <li>▪ In general, ALMOs are able to develop a clear housing brand, goal and visions, which is easily understood to those who interact with it. This also separates the reputation and brand of the housing service from the Local Authority which is welcomed by some parent Local Authorities. Nottingham City Homes, an award-winning ALMO with high levels of customer satisfaction, has adopted this approach. More information on Nottingham City Homes is found in Appendix 3.</li> <li>▪ As opposed to a diversified ALMO, being engaged in fewer types of business activity can bring focus to the organisation and can enable the ALMO to operate without the broad skill set among senior management and board that is required in organisations with more diverse business activities.</li> </ul>	<ul style="list-style-type: none"> <li>▪ In general, any ‘value added’ by the ALMO to the Local Authority is only in housing services; benefit is not felt in other services</li> <li>▪ As opposed to a ‘diversified’ ALMO, retaining THH with its current delegated responsibilities limits how much the ALMO can grow, restricting opportunities to generate income for the Local Authority</li> <li>▪ As opposed to bringing the ALMO in-house, retaining THH could prevent potential synergies that may exist between housing management and other delivery areas</li> <li>▪ Without a compelling reason to retain the ALMO in the post-Decent Homes era, a decision to extend the management agreement ‘as-is’ may just delay the ALMO coming in house in the future</li> </ul>
Opportunities	Threats
<ul style="list-style-type: none"> <li>▪ The ALMO already has a service improvement programme in place and therefore has the opportunity of improving services in the future.</li> <li>▪ Extending the existing management agreement would enable the ALMO to continue to deliver against cost reduction targets set by LBTH until 2022.</li> </ul>	<ul style="list-style-type: none"> <li>▪ There is a risk that after an extension of the management agreement, THH fails to achieve cost reduction targets, planned performance improvements, or address other issues identified in Stage One.</li> </ul>

## 11 | Option 3: Extension with Fewer Services

### 11.1. Introduction

11.1.1. This option would involve extending the management agreement for THH but varying it to transfer some services and functions from the ALMO to the Council. This would result in making THH a 'thinner' ALMO.

### 11.2. The Context for LBTH and THH

11.2.1. As discussed above in paragraphs 4.2.3, LBTH is currently delivering a major transformation project across Council services. A significant element of this transformation is the centralisation of a number of functions that are currently dispersed across different directorates within LBTH.

11.2.2. Following the Council's transformation plan, it may feel that some high-performing Council functions could more effectively and efficiently deliver services either to, or instead of THH. We understand that there are no plans to centralise any THH functions for the foreseeable future.

11.2.3. It is important to keep in mind that THH is already what may be considered a 'thin' ALMO. It is more commonly the case that variations to management agreements result in a greater number of services being delivered by the ALMO. Based on the lack of precedent for partially bringing ALMO services in-house, the absence of plans within the Council, and our findings in Stage One of this report, it is not clear that there are any service areas which are strong candidates for transfer from THH to LBTH.

### 11.3. Financial Implications

11.3.1. If service delivery functions were transferred from the ALMO to the Council, we would expect this to be accompanied by a corresponding reduction in the management fee paid by the Council to THH. The amount reduced would have to be negotiated. To ensure that such a change was delivering value for money, care should be taken to ensure that the cost of delivering the service by the Council does not cost more to the HRA than it did under the ALMO.

11.3.2. Moving service delivery functions to the Council will also likely impact on the relative cost of business overheads within THH. Unless corresponding cost reductions are made, THH having fewer services, turnover (management fee), and staff will likely result in higher relative costs (per employee) for HR, office accommodation, executive team, board costs, transformation / change management etc.

11.3.3. In addition to THH overheads, it would also impact on the relative cost of the Council's ALMO clienting function. LBTH should take care to assess the wider financial impacts of any services under consideration for being brought in-house to the Council.

11.3.4. In the case of a back-office service (such as finance) being moved in-house from the ALMO, an SLA would be required (as is already the case with a number of services provided by the Council to THH). This could have the impact of reducing, maintaining, or increasing costs to the HRA as a whole. Whatever the case, in such a scenario, THH's control over their cost base would be diminished and their ability to deliver against cost reduction targets may be limited.

#### 11.4. Legal Implications

11.4.1. LBTH can vary or alter the services offered pursuant to Clauses 63 and 64 of the management agreement. In effect, LBTH (after consultation with the ALMO) may vary the Agreement by increasing or decreasing the number of services offered.

#### 11.5. SWOT

11.5.1. Here we record the strengths, weaknesses, opportunities and threats of this option.

Strengths	Weaknesses
<ul style="list-style-type: none"> <li>▪ Having fewer services (depending on which services) could result in the ALMO developing a more focused organisation purpose and culture.</li> <li>▪ Could be a route to phase the transfer of services out of the ALMO while reducing the disruption of a 'big bang' approach.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Partial in-sourcing of housing management functions would split the responsibility for housing management, losing cohesion of approach and ease of working across teams within the ALMO.</li> <li>▪ Sharing housing management services across both the ALMO and Council would likely confuse some Council tenants, some of whom are already unclear about the division between the responsibilities of the two organisations.</li> </ul>
Opportunities	Threats
<ul style="list-style-type: none"> <li>▪ If the Council in-sources functions that are currently working particularly well in the Council, there is the opportunity to make efficiency savings to the HRA and / or service improvements.</li> <li>▪ Some less well-performing functions in the ALMO could be improved by bringing them in-house and the additional scrutiny that would bring. Cost could also be potentially reduced if economies of scale across the Council could be realised</li> </ul>	<ul style="list-style-type: none"> <li>▪ There is a risk that moving a function or service in house could cause disruption which negatively impacts on the cost and / or quality of the service.</li> <li>▪ Splitting core housing management functions across the Council and THH could lead to a lack of clarity of roles and responsibilities that leads to service failure in some cases.</li> <li>▪ Splitting services could create duplication where roles were not clear leading to inefficiencies.</li> </ul>

## 12 | Option 4: Extension with More Services

### 12.1. Introduction

- 12.1.1. A further option considered in this review is for THH's management agreement to be extended and varied, with the ALMO being contracted to deliver more services on behalf of the Council. ALMOs that have taken on significant additional service areas and workstreams can be considered 'diversified'.
- 12.1.2. The types of services that diversified ALMOs deliver include those previously delivered by the Local Authority, such as homelessness and housing options (Barnet Homes), new-build housing development (Stockport Homes) and even street cleaning (South Tyneside Homes).
- 12.1.3. A number of these 'diversified' ALMOs are also branching out to provide services to third parties, such as Barnet Homes, which provides private sector lettings and a short break respite service; and Nottingham City Homes, which is now parent to a group which includes a Registered Provider and a commercial vehicle offering market rent homes let on long-term tenancies. More information about services offered by Barnet Homes and Nottingham City Homes is found in Appendix 3.
- 12.1.4. Alongside the core housing services usually delivered by ALMOs, additional services that have been delivered by 'diversified' ALMOs include:
- Landlord licensing
  - Homelessness services
  - Adult social care
  - Private rented sector management
  - Management and maintenance of other LA assets
- 12.1.5. For THH this model would mean taking on and delivering additional services on behalf of LBTH.

### 12.2. THH's Enhanced Offer to LBTH

- 12.2.1. During the course of this review THH has provided an 'Enhanced Offer' to LBTH which outlines additional or enhanced services that it would seek to provide should the management agreement be extended. These are presented as activities which respond to LBTH's strategic aims where there is both a direct benefit to THH's residents, and where THH is able to extend services in which they are currently delivering good practice and value for money.
- 12.2.2. The enhanced offer is centred around core themes that THH believes it is best placed to deliver on. These themes reflect some of the objectives highlighted in LBTH's 2016-2021 Housing Strategy and wider strategic objectives. They include:

- Ensuring homes are safe and decent with THH delivering on the £154m of Better Neighbourhoods funding for external major works and communal improvements
- Effective resolution of complaints with THH's strong track record on complaints with 96% of stage one complaints resolved on target
- Empowering residents and strengthening the regulator via THH's maintained relationship with residents' organisations and commitment to consultation and active participation by residents
- Tackling stigma through promoting skills and inventiveness of local communities, and through placemaking by improving the look and feel of estates away from that of classic municipal housing
- Expanding supply and supporting home ownership by THH successfully managing handover of new builds and by carrying out detailed analysis on how to create new affordable homes from existing stock, including through rooftop development.

12.2.3. To respond to these strategic objectives, THH's Enhanced Offer proposes several service areas the ALMO may be able to expand or adopt on behalf of the council. These include:

- Taking responsibility for all ASB in the borough
- Delivering diversionary activities for young people at risk of ASB into employment
- A second stage in the leasehold service improvement programme
- Fire safety inspections across other Council-owned or managed properties as well as the private sector
- Managing LBTH's temporary accommodation activities

12.2.4. We understand that the offer document follows work by the ALMO to identify key areas where it believes it can add value to the Council. Amongst THH board members, who input into the review, there was significant support for THH to work more broadly across the borough to deliver ASB services.

12.2.5. The Council has provided an initial view on the potential for transfer of additional service areas into THH management and delivery. In short, there are no existing Council services which are considered suitable for transfer into THH at this stage. Service areas that have been considered include the following:

- **Borough-wide ASB services** – the Council has recently restructured its direct provision to tackle ASB, having carefully reviewed its corporate approach in partnership with the Police and other local agencies, including the interface with THH and managing ASB on Council housing estates. This new service delivery configuration is currently being embedded. This consolidation does not fit with an option of service transfer to THH. There have been THH proposals about activities to divert your people at risk of ASB into employment and this area of

service delivery is already being explored as part of the existing THH management approach on estates.

- **Landlord Licensing** – the Council's Environmental Health service has an existing HMO licensing scheme and is about to introduce an additional licensing scheme, addressing private landlords across the borough. There are important linkages and interfaces with other Council enforcement services. There would not be a good direct fit with THH services which are focused on Council estate management and maintenance.
- **New build** – the Council has introduced a Capital Delivery Team to coordinate property development activity across housing, community, education and other corporate property areas, delivering synergies and building capacity and expertise. Transferring the housing new build programme to THH would undermine this approach and reduce the scope for economies, efficiencies and delivery flexibilities. However, there is scope to explore those new build projects that have an immediate and direct impact on residents, such as the rooftop/air space developments.
- **Fire safety** – the Council has already drawn on THH's fire safety expertise to address commercial properties on housing estates as well as dwellings themselves. However, there is not a strong case for extending this role to other corporate non-residential buildings, where different regulations and protocols apply.
- **Temporary Accommodation** – the Council is a lead participant in the pan-London temporary accommodation procurement and management vehicle called Capital Letters, which involves 13 boroughs working collaboratively through a new not-for-profit company. The intention is for the majority of the need for homeless prevention and temporary accommodation for Tower Hamlets to be met through Capital Letters, which will involve seconding Council staff. It would not make sense to consider a service transfer to THH in this context.
- **Private lettings agency** – in 2016 the Council and THH together explored the option of setting up a lettings agency to secure tenancies from private landlords. However, research showed that other authorities who had pursued a similar approach had very limited success so it was concluded that this would not be pursued further in Tower Hamlets.

12.2.6. The one area of potential new service provision for THH, which has already been discussed in outline, is the provision of management and maintenance services to the Councils two new housing delivery vehicles, namely Seahorse Homes Ltd (providing market rent homes) and Mulberry Housing Society (providing affordable rented homes). Neither of these new vehicles has yet to complete construction or acquisition of new homes, so the prospect of entering into a management agreement with THH remains a future potential. It is also important to note that it will be a commercial decision for each of the respective company Boards of Directors whether to enter into such a contract and on what terms, therefore it would not be appropriate to make a firm recommendation about this possibility within this THH review report.

### 12.3. Non-Council Services

12.3.1. Although not contained within THH's Enhanced Offer, the ALMO could consider branching out into providing services to third parties on a commercial basis. In doing so, a 'diversified' THH could generate net income towards the LBTH General Fund. Examples of income-generating activities that could benefit the General Fund include:

- Sales agency - A service for leaseholders linking to THH's leasehold management service. Commission from re-sales of Council leases could be set at competitive rates to generate an income.
- Discretionary gardening/ handyman service – Given THH's significant network of caretaking staff, offering a discretionary handyman service to THH residents and non-residents may be a viable profitable business.
- Mixed-tenure housing management – This is an area in which some diversified ALMOs operate. This may be an opportunity given LBTH's newly established housing delivery vehicles Seahorse Homes and Mulberry Housing Society.

12.3.2. However, in considering the addition of entirely new 'commercial' services both LBTH and THH need to be aware that they will face the same risks of any new business, and that these activities may not necessarily be successful. Market research and demand analysis as well as recruiting appropriate expertise to lead commercial service delivery would be critical to the success of any new venture.

### 12.4. Financial Implications

12.4.1. If LBTH decides to pursue this option, the income and costs of the additional services that THH intends to provide would need to be fully assessed and fed through the current HRA and overall Council Business Plans to ensure that they both remained viable. In principle, if THH is able to provide the services at no greater cost, and at least of equal quality, the impact should be neutral or positive, although there is likely to be an upfront cost to undertaking the transfer.

12.4.2. If additional council services are transferred to THH from LBTH as part of a varied and extended management agreement, there would likely need to be a corresponding increase to the management fee, although this may be partially offset through additional efficiencies or delivery of new sources of income by the ALMO.

12.4.3. Moving service delivery functions to the ALMO will likely impact on the relative cost of business overheads within THH. THH having more services, turnover (management fee), and staff will likely result in reduced relative costs (per employee) for HR, office accommodation, executive team, board costs, transformation / change management etc. This benefit would be offset to the extent that SLA charges for these services may be increased to reflect the increased activity levels within THH.

12.4.4. However, the movement of services from the Council can have the inverse relationship for Council departments. The loss of particular functions from the Council structure could result in higher relative costs of management and other



overheads. This would be offset to the extent that increased SLA charges to THH may make a greater contribution towards LBTH overhead costs. LBTH should take care to assess the wider financial impacts of any services under consideration for being transferred to the ALMO, considering both the costs and any potential savings. In addition to THH overheads, it would also impact on the relative cost of the Council's ALMO clienting function.

- 12.4.5. In its Enhanced Offer, THH recognises that the drivers for transferring services such as ASB, landlord licensing, fire-safety inspections, and TA administration, would be to improve performance in these areas, and/or improve value for money. As such, THH should develop business cases for LBTH to consider and assess on the basis of THH's capacity and ability to either improve service quality or maintain service quality at a reduced cost.

## 12.5. Legal Implications

- 12.5.1. As indicated in paragraph 4.4.1 above, LBTH can vary the service offer; and as such could increase the services to be delivered by the ALMO.
- 12.5.2. If a new Management Agreement is negotiated in which THH is given extra powers to 'trade for profit', both within the Local Authority area and further afield, LBTH and THH will need to be aware of EU Procurement Regulations and, in particular, the Teckal exemption. Under Teckal, it is important that the "substantial majority" of THH' services need to be provided to LBTH.
- 12.5.3. Further, if wider powers are given to THH to provide new services and to generate income from non-council sources, the Articles of Association of THH will need to be amended. The new Articles will need a wider 'objects' clause drafted and will need to include reference to the Companies Act 2006 to ensure they are compliant with the new Act.

## 12.6. Communication Implications

- 12.6.1. Depending on the services to be transferred there may be existing service users who require consultation, whether formal or informal. This is likely to be less substantial for non-specialist or borough-wide services with a less well-defined user group. For new services being delivered communications would likely focus on marketing the offer and developing the THH brand in new service areas.
- 12.6.2. For both the introduction of new services or the transfer of services from LBTH communication with existing THH residents may be desirable to manage any concerns they have about the shift in organisational focus away from solely affordable housing.

## 12.7. Clienting Implications

- 12.7.1. If THH were to be given more services to deliver on behalf of LBTH, it is likely that the clienting function would need to be reviewed to assess if any additional

resources of meetings / panels would be required. Additional resource may be provided in the form of subject-matter experts (either currently within the Council or provided through external advice).

12.7.2. Considering the proposed additional services contained within THH's Extended Offer, it is likely that the clienting and oversight structure would need to be expanded, at least in the short term, to include an ASB panel/meeting and temporary accommodation panel/meeting.

12.7.3. Such panels should otherwise fit into the existing governance/clienting structure by reporting to either Bi-Op or the Quarterly Strategic Meeting.

## 12.8. SWOT Analysis

12.8.1. Here we record the strengths, weaknesses, opportunities and threats of this option.

Strengths	Weaknesses
<ul style="list-style-type: none"> <li>▪ The ability to deliver efficiencies of scale (particularly of overheads and corporate services) as the ALMO grows.</li> <li>▪ Enables LBTH to focus on strategic priorities for more services (such as ASB) as delivery is managed by the ALMO.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Creates operational distance and control between the Council and any services transferred</li> <li>▪ Moving more services from LBTH and THH would likely require more clienting processes and possibly additional clienting resource</li> <li>▪ Would likely make bringing the ALMO back in-house in the future more challenging</li> </ul>
Opportunities	Threats
<ul style="list-style-type: none"> <li>▪ There is the opportunity for THH to spread good practice where it already exists within the organisation, to other services on behalf of the Council. This is an opportunity particularly regarding the services contained within THH's Enhanced Offer.</li> <li>▪ The potential for net income generation from the additional services, particularly commercial services which could benefit the General Fund or cross-subsidise community and care services.</li> </ul>	<ul style="list-style-type: none"> <li>▪ If taking on services currently being delivered by LBTH, THH may need to implement new structures and operating models, requiring additional costs which may negate the business case for transferring the service(s)</li> <li>▪ THH may fail to deliver cost savings and/or service improvements in the services transferred to the ALMO</li> <li>▪ The introduction of disparate business streams may lead to the development of silos and different non-cohesive cultures within the organisation</li> <li>▪ Entering new business streams could expose THH and therefore LBTH to significant financial and reputational risk.</li> </ul>

## 13 | Option 5: Extension with Different Services

### 13.1. Summary

- 13.1.1. Options 3 considered the transfer of service from THH to the Council, and Option 4 considered the transfer of services from the Council to THH; however, it is also possible that some services could transfer out of THH to LBTH at the same time as other services were transferred from the Council to the ALMO.
- 13.1.2. The implications for Options 3 and 4 would apply to this option and as such we have not explored it in greater detail.
- 13.1.3. However, as noted in the description of Option 3, there are no current plans for services to be centralised from THH to the Council, and as THH is already a 'thin' ALMO with a focus on the delivery of housing management services it is not obvious what services would be centralised with the Council, particularly if this were to be combined with an expansion of THH's role in other areas.

## 14 | Summary: Review of Housing Management Models

14.1.1. This section compares each of the four primary options using a 'Suitability, Feasibility, Acceptability' (SFA) analysis. This is intended to summarise our findings and to identify which options best fit LBTH's strategic context.

### 14.2. Suitability, Feasibility, Acceptability Analysis

14.2.1. The SFA analysis is a method of considering available options against three key criteria:

- **Suitability** - how suitable is each option in addressing LBTH's strategic objectives for housing and the drive for value for money and quality services, and how suitable is each option in addressing issues identified in Stage 1 of this review?
- **Feasibility** - how simple or complex would each option be to implement? What level of resources would be needed to support the implementation (financial, human and other)?
- **Acceptability** – how acceptable is each option to key stakeholders, e.g. LBTH officers, councillors, residents, THH staff, and broader stakeholders?

14.2.2. This analysis has been applied to each of the housing management models, in light of the implications and strengths and challenges outlined in the sections above. We have Red-Amber-Green (RAG) rated the table below to show where we have scored high, medium and low against the suitability, feasibility and acceptability of each option.

### 14.3. Summary

14.3.1. Stage 1 of this review found that there is no performance or financial imperative to bring the housing service in-house. However, given that THH is largely a 'thin' ALMO, in that it mainly delivers 'core' housing management services, in a post-Decent Homes era, there may not be a compelling reason to retain the ALMO indefinitely.

14.3.2. Given LBTH's transformation programme and its plans to already bring the refuse collection service in-house by 2020, bringing the ALMO in-house over the same time period, at the end of the current management agreement period, may expose the service to greater risk of reduced service quality, and may increase the risk of a costly service failure. Even without these other change activities, 2020 may be too challenging a target date for bringing the ALMO in-house, given the necessary preparation and processes to successfully transfer the service.

14.3.3. Overall, the option to retain THH in its current 'thin' ALMO form scores the highest using this analysis. However, this analysis assumes that THH continues to achieve cost savings against the targets set by LBTH, that resident satisfaction and other performance is either maintained or continues to improve.

	Suitability	Feasibility	Acceptability	Overall Comments
In-house management	Stage 1 of this review found that there is no performance or financial imperative to bring the housing service in-house. THH is generally well-performing and is making financial savings to the HRA in-line with Council targets. Bringing the AMLOALMO in-house risks losing the improvements to the housing service that THH has achieved in recent years.	The option under consideration, as per the brief provided by LBTH for this review, is of the housing management service being brought in-house in 2020. LBTH has plans to bring the refuse collection services (currently delivered by Veolia) in-house in 2020. LBTH is also in the process of a significant internal transformation programme. These two major activities may negatively impact on LBTH's ability and capacity to also in-source the housing service over the same time period. Even without the transformation programme and refuse collection changes, 2020 may be too challenging a target date for bringing the ALMO in-house, given the necessary preparation and processes to successfully transfer the service.	In the course of our review we did not encounter much support for bringing the ALMO in-house in 2020. Some stakeholders felt that if the ALMO does come in-house, 2020 would be too early, given the plans for the refuse collection service and LBTH's internal transformation programme.  Councillors, LBTH staff, and engaged residents did not consider the housing management service in need of such significant a change in delivery model: "the ALMO isn't broken". However, we also did not see evidence of a compelling reason to keep the housing service outside of the Council after 2020.	As the most significant change from the status- quo the implementation of this option presents the greatest risk to the Council in terms of cost and performance. This is exacerbated by other non-business as usual' activity scheduled for LBTH in 2020.  However, many Councils successfully manage their stock in-house, and outside of the risk within the change management programme there is no reason that this would not also be the case for LBTH.  That being said, we have found no compelling reason to pursue this option.
Extension of existing management agreement	While THH's service quality and cost performance is good, with a successful transfer of services LBTH could deliver the same or better quality and cost of services. Given that THH is largely a 'thin' ALMO, in that it largely delivers 'core' housing management services, in a post-Decent Homes world, there may not be a compelling reason to retain the ALMO indefinitely.	Extending the existing management agreement is the most easily implemented option under consideration. It would require a Mayoral decision and the signing of a new management agreement between the Council and THH.	Given that THH is a generally well-performing housing manager and the additional risk of bringing a second major service in-house in 2020 (in addition to refuse collection), we expect that extending the existing management agreement for 3-5 years would be widely acceptable to stakeholders.	As the status quo option this route presents the least risk to the Council and is the 'easiest' option.  In our review we have found no evidence to suggest fundamental problems with the current model, that would suggest the ALMO should not be retained.
Thinner ALMO	Given that THH is already a 'thin' ALMO, it is not clear what services would be better placed being delivered by the Council. The suitability of this option is highly dependent on the particular services (if any) that may be considered.	The transfer of services from THH to the Council would have to be planned carefully to ensure as little disruption as possible to existing services.	There is not widespread support amongst stakeholders for reducing the scope of THH's offer, and there are no current plans to transfer services from THH to the Council.	A partial transfer of services presents lower risk to the Council than fully taking THH in-house. However, as many services are interlinked it may create unforeseen complexity and reduce transparency and accountability.  Further, transferring services from THH to the Council may diminish the case for the ALMO's continued existence.
Diversified ALMO	A detailed business case would need to be developed for each new or transferred service under consideration. The test is not whether THH could deliver those services well, but rather, that THH could deliver them at greater quality and/or more efficiently than LBTH. The suitability of this option is highly dependent on the particular services (if any) that may be considered.	The transfer of services could be administered through amendments to the management agreement and/or SLAs between the Council and THH. Operational transfer would have to be planned appropriately.  With any transfer of operational service, comes risk of loss of service quality (both temporary and long-term), potential additional costs of implementing a transfer, and risks to the culture of an organisation.  To deliver new services THH will likely have to grow or recruit new expertise. All new business ventures are risky, and many new businesses fail. This risk should not be underestimated in considering new business opportunities.	Where a compelling case can be made for THH to offer greater value for money and improved services, some of service transfer or new services are likely to be supported by stakeholders in LBTH and THH. The Council currently sees little rationale for specific transfers of additional services as set out in the THH Enhanced Offer. For residents, it is likely to depend on what service(s) are being transferred to the ALMO. It is important that communication about any transferred services is clear and well communicated to tenants and leaseholders.	To create certainty and service sustainability where new services were transferring into the ALMO the agreement would likely need to be for a reasonable period of time to allow the change management cycle to complete, and THH to embed changes designed to deliver savings or improvement. As such the length of any management agreement extension would need to reflect this.  Collaborative working between LBTH and THH would be required to make a success of the transfer of services, and reporting would need to allow LBTH good visibility on the ongoing performance of transferred services.

## 15 | Recommendations

15.1.1. This section summarises our recommendations for consideration by LBTH and THH. We have split out these recommendations into Stage 1 Recommendations (i.e. recommendations arising from our initial evidence-gathering work) and Stage 2 Recommendations (i.e. recommendations associated with each of the future management options under consideration).

### 15.2. Stage 1 Recommendations

15.2.1. We list below our recommendations based on our findings from the Stage 1 evidence-gathering exercise. It should be noted that many of these recommendations will only be applicable should LBTH decide to pursue a future management option that involves the continued existence of THH.

- The Council should clarify to THH its expectations regarding the ALMO's VfM objectives
- The ALMO's Business Plan should include more explicit reporting of how THH's achievements align with the ambitions of the Council
- THH should continue to target higher leaseholder satisfaction, given the large proportion of leaseholders in their resident body (approximately 45%)
- THH should note the common feedback from both residents and LBTH about the quality of major works and contract management and seek to make improvements as necessary
- THH should give consideration to increasing investment in rent arrears collection (in the context of a service review of the rent collection function undertaken in summer 2018, the recommendations of which are yet to be implemented)
- THH should consider focusing on improving major work recharge collection rates
- THH should implement regular reporting of cost KPIs and/or cost benchmarking to support the ALMO in achieving VfM
- LBTH should consider the purpose of the various bodies in the THH governance / engagement structure to ensure that the division of responsibilities, delegations and terms for each are clear and fit for purpose
- LBTH and THH should work together to formally clarify their respective roles (including the levels of delegation and authority) in order to reduce duplication of meetings, papers etc. between the two organisations
- LBTH and THH should work together to provide clarity over the Council's expectations of the ALMO, and define a common vision for the Council/ALMO relationship
- Consideration should be given to how best to improve communication between teams within THH, between THH and the Council, and between both of these bodies and residents

### 15.3. Stage 2 Recommendations

15.3.1. As detailed in this report, there are a number of options available to LBTH regarding its future housing management arrangements:

- In-house management
- Management agreement extension
- Extension with fewer services
- Extension with more services

15.3.2. We summarise below the recommendations we have set out for LBTH to consider when pursuing any of these options.

15.3.3. Regardless of which option LBTH chooses to pursue a detailed business case should be developed which considers the financial case for the change, and the potential impact of any risks, as detailed in the previous sections.

#### In-house management

15.3.4. This model represents a significant change as the ALMO would cease to exist and the services it provides brought back into LBTH in 2020. This would have an impact on the structures, processes and ways of working at the Council.

15.3.5. If LBTH decides to pursue this option, it should:

- Consider how to ensure that sufficient resource is made available within LBTH to enable the successful transition of housing management services from THH into the Council
- Rationalise the senior management structure for THH to fit within LBTH's management structure and give detailed consideration to how wider staff structures be rationalised in order to achieve savings on staff costs
- Undertake detailed work to estimate the potential savings of the move, and consider strategies to ensure that the risk of service disruption or failing to achieve meaningful savings is mitigated (e.g. ensuring that back-office functions are appropriately resourced)
- Consider how LBTH can measure and report on the impact on both services and costs of the transfer
- Undertake a consultation exercise on the proposed move with relevant stakeholders, and ensure that communication about the decision is timely and clear
- Give consideration to the succession of bodies such as the THH board and the Residents' Panel, and how resident engagement and scrutiny can continue to be delivered

- Consider the future role of the current clienting function

15.3.6. For all options in which the management agreement is extended we suggest that the relationship between LBTH and THH could be strengthened, and greater oversight and assurance given to the Council, by strengthening the role of the clienting team and improving the clarity of its role and strategic priorities.

#### Management agreement extension

15.3.7. This option represents a continuation of the status quo which would result from an extension of the existing management agreement with no changes to the division of service provision between the Council and the ALMO.

15.3.8. If LBTH decides to pursue this option, it should:

- Consider whether or not to extend the savings targets currently in place for the ALMO, subject to an appropriate scoping exercise
- Review services, costs and performance to ensure that both LBTH and THH, and residents, are happy to continue with current arrangements
- Undertake appropriate negotiations with the ALMO regarding the extension of the agreement
- Ensure that the rationale for its provisional decision are clearly communicated to residents, and that relevant stakeholders are consulted

#### Extension with fewer services

15.3.9. This option would involve extending the management agreement for THH but varying it to transfer some services and functions from the ALMO to the Council. This would result in making THH a 'thinner' ALMO.

15.3.10. If LBTH decides to pursue this option, it should:

- Consider carefully which services should be transferred from the ALMO to the Council, as it is not clear that there are any strong candidates for services to be transferred from THH to LBTH. The Council should ensure that the cost of delivering the transferred services by the Council does not exceed how much it cost under the ALMO
- Consider how the reduction in services is accompanied by a corresponding reduction in the management fee paid by the Council to THH; this would have to be negotiated
- Assess the wider financial impacts of bringing services in-house
- Ensure that communications with stakeholders is clear regarding the decision, including clarity on which services are being moved



### Extension with more services

15.3.11. Under this option, THH's management agreement would be extended and varied, with the ALMO being contracted to deliver more services on behalf of the Council.

15.3.12. During the course of this review, THH has produced an 'Enhanced Offer' outlining a range of additional or enhanced services which it could provide to the Council.

15.3.13. If LBTH decides to pursue this option, it should:

- Work with THH to explore the 'Enhanced Offer' which THH has published, in order to establish how much of this offer it wishes to take up
- Work with THH to explore the potential of the ALMO branching out into providing services to third parties on a commercial basis, in order to generate net income towards the LBTH General Fund
- Fully assess the income and costs of the additional services which THH could provide, and feed these through the current HRA to ensure that both organisations remain viable
- Consider the impact of additional service provision by THH on the management fee paid by the Council to the ALMO
- Assess the wider financial impacts of any services under consideration for being moved across to the ALMO, including any associated additional costs and resourcing requirements for the LBTH clienting function (e.g. setting up ASB and/or temporary accommodation panels and meetings)
- Direct THH to develop business cases for individual services which it wishes to take on, for LBTH to consider and assess on the basis of THH's capacity and ability to either improve service quality or maintain service quality at a reduced cost
- Familiarise itself with relevant legal requirements, such as EU Procurement Regulations and in particular the Teckal exemption
- Work with THH to update the Articles of Association in light of the new management agreement and service division
- Co-ordinate with THH to issue consistent and timely communications to all stakeholders affected by the change in service provision. THH will need to justify additional services taken on, potentially through informal consultation with existing service users

## Appendix 1 | Documents Reviewed

Asset Management Strategy V5.1 approved by board and QSM

Bi-OP Minutes (Feb - Sep 2018)

Copy of Management Agreement with Affidavit

Fire Safety Strategy

HouseMark - Tower Hamlets Homes - Detailed analysis of operating costs (October 2018)

HouseMark Schedules for Tower Hamlets Homes 20181029

Information Showing the Impact of MyTHH Apr-Dec 2018

LBTH 2016-21 Housing Strategy

LBTH-THH MA Extension DMT

Mayor's Housing Meeting Notes (Feb - August 2018)

Mayor's letter (THH lease extension)

Public reports pack 03rd-Oct-2007 17.30 Cabinet

Quarterly Strategic Meeting Minutes (Jan - July 2018)

Repairs Project Presentation MonOp 260515

The Councils Landlord Service\_Cabinet report 070207

THH Accommodation Cost projections (2018/19)

THH Briefing on 2019 restructures

THH Briefing on arrears collection in Lessee Services December 2018

THH Briefing on Tenant Income Collection

THH Business Plan 2018/19

THH CEO Reports (Feb 2017 - July 2018)

THH Governance and Resident Engagement

## Appendix 2 | Benchmarking Comparators

### LA and ALMO Comparators

- Barking and Dagenham
- Barnet Homes
- Brent
- Camden
- City of London
- Croydon
- Ealing
- Enfield
- Greenwich
- Hackney
- Hammersmith and Fulham
- Homes for Haringey
- Harrow
- Havering
- Hillingdon
- Hounslow
- Islington
- Kensington and Chelsea
- Kingston upon Thames
- Lambeth
- Lewisham Homes
- Newham
- Redbridge
- Southwark
- Sutton Housing Partnership
- Waltham Forest
- Wandsworth
- Westminster

### Private Registered Provider Comparators

- East End Homes
- Genesis Housing Association
- One housing Group
- Peabody Trust
- Poplar HARCA
- Southern Housing Group
- Swan Housing Association
- Tower Hamlets Community Housing

## Appendix 3 | Case Studies: In-House Delivery

### LB Lambeth

#### Key learning points from case study

- Motivations for in-house delivery include joining up all council services
- Development of a wholly owned development company to increase development for a growing social housing waiting list, while working with housing management service in-house

LB Lambeth is an inner London borough in south London; it has c.24,000 homes of council stock. Lambeth Living was set up in 2008. In June 2015 housing management was returned to the Council. In returning housing management services to Lambeth Council, the Council issued a statement that moving services in-house would help address the following:

- Improved communication with residents
- More joined up working with housing and other council services
- The need to review resident engagement
- Delivery of a quality housing management service in particular repairs and maintenance

In 2010, Lambeth Living faced considerable pressure by the Council to improve performance to access Decent Homes funding. Lambeth Living did not achieve the “two stars” needed for Decent Homes funding, and by the time the ALMO was brought in-house, the Decent Homes funding model had changed. In 2015, the Council decided that the ALMO no longer served the purpose that it was originally intended for and, increasingly challenging funding regimes meant that the Council believed it could offer better value for money.

Now that the Council manages the stock, resident involvement is primarily conducted through tenant and resident associations (TRAs). There are c.80 TRAs in the borough covering 60% of Lambeth Council’s properties. This is similar to the structure that existed under Lambeth Living, although the Council has plans to move to a structure with other participation options including an online engagement tool. In 2017, 70% of tenants and 43% of leaseholders were satisfied with the overall housing services provided by the council.

## LB Hillingdon

### Key learning points from case study

- New funding models and the end of Decent Homes means that ALMOs can be brought in-house without losing financing opportunities
- Removes duplication to release efficiency savings
- May reduce accountability to residents of council homes.

LB Hillingdon is an outer London borough situated in West London. It has c.10,000 homes of council stock. Hillingdon Homes was set up in 2003 in the “Round 2” period of ALMO creation. In February 2010 LB Hillingdon became the first Local Authority to announce it was taking its ALMO back in-house. Since October 2010, housing management has returned to the Council.

An in-house delivery model means that the Local Authority is responsible for managing its stock. For LB Hillingdon, bringing the ALMO in-house cost £300,000, but it was expected to save £300,000 each year by rationalising governance and support services. This has not been monitored, so it is not clear if these savings were achieved in practice. Housing now sits within the Residents’ Services directorate. The housing function is responsible for:

- Tenancy services
- Housing needs
- Home ownership and RTB
- Rent collection
- Traveller site management
- Private sector housing
- Caretaking and estate services
- Housing policy

Hillingdon Homes had performed well and had completed the Decent Homes programme when it was brought in-house. LB Hillingdon argued that it could not justify running a separate company to manage housing at a time of severely restricted budgets. It felt that increases in flexibilities and freedoms promised by the Government for ALMOs had not materialised, while freedoms to borrow and new build had been extended to Local Authorities. This enabled LB Hillingdon to bring its ALMO in-house without being disadvantaged financially.

Resident involvement is primarily conducted through a customer senate, which provides little scrutiny and has a limited impact on the strategic priorities for housing delivery. LB Hillingdon has not measured resident satisfaction since the ALMO was brought in-house.

## LB Hackney

### Key learning points from case study

- The end of Decent Homes and lack of political will may lead to closing ALMOs in spite of positive performance indicators
- Some ALMOs work with the council to ensure the process of going in-house is not negative for services or staff

LB Hackney is an inner London borough that borders Tower Hamlets, it has c.22,000 homes of council stock. Hackney Homes was set up in 2006 to access Decent Homes funding. In 2014, a joint proposal was made from the Hackney Homes Board and Hackney Council to consult with leaseholders to return housing management to the Council in 2016. Since April 2016, housing management has returned to the Council.

Hackney has an in-house delivery model, which means that the Local Authority is responsible for managing its stock. When LB Hackney took back housing management responsibilities from Hackney Homes, services included:

- Tenancy services
- Housing advice
- Home ownership and RTB
- Estate services
- Leaseholder and freeholder services
- Rent collection
- Tenant finder and guaranteed rent services in private sector
- Housing policy

In 2015, Hackney Council announced that the ALMO was to be brought in-house despite a decade of good work and improvements to the Council's housing offer. The Council claimed that the ALMO had successfully built relationships with residents which the Council aimed to evolve more efficiently in the future. Decent Homes ended the year it was decided to bring the ALMO in-house, and so demonstrates that despite positive performance, the council lacked the political will to maintain the ALMO in the post-Decent Homes era. The board of the ALMO and Hackney Council worked together throughout the transition.

Resident involvement is primarily conducted through a tenant scrutiny group and tenant and residents' associations (TRAs). Following the decision to move in-house, the board of the former ALMO was maintained for transition purposes but was eventually dissolved, although the tenant scrutiny panel has continued to meet and publishes quarterly reports. LB Hackney continues to publish housing performance reports on their website, including an annual report to tenants.

## LB Brent

### Key learning points from case study

- A combined concern for lack of satisfaction improvements over a recovery period and a desire for efficiency saw a return of Brent stock back to the council
- Wider social housing themes, such as digitalisation, can influence whether or not the ALMO is perceived as fit for the future

LB Brent is an outer London borough in north-west London; it has c.11,500 homes of council stock. Brent Housing Partnership (BHP) was set up in 2002 to manage the Council's stock and was one of the few ALMOs with Registered Provider status. The Council provided a number of support services to BHP including accommodation at the Civic Centre, IT, payroll and legal support.

In 2016, LB Brent undertook a housing options review to review BHP in light of poor performance. Options were presented by the Council to maintain a transformed version of BHP, to return services to the council, or to engage in a partnership with another organisation.

A transformed BHP would have required BHP to appoint a smaller, skills-based board, reforming its leadership team, creating an enhanced client-side function within the Council and improvement resident engagement. The option to retain the ALMO would have required further integration with the Council's services to avoid duplication across the Council and ALMO. Ultimately, the Council decided that in light of control and financial considerations the Council would bring housing management services in house.

In 2017, Brent's stock was returned to the Council to be managed in-house. The following services once controlled by BHP now sit with the Council:

- Tenancy Management (including client responsibility for two TMOs)
- Leaseholder Management
- Property services
- Development services

Resident involvement is primarily conducted through a Customer Experience Panel (CEP), or scrutiny board, and a contractor review group. Brent also facilitates various resident bodies and TMOs. Brent publishes an annual report for residents to highlight and evaluate resident involvement, the most recent of which (Winter 2018) identifies how Brent will address common resident complaints and outlines an intention to develop housing standards (a "Housing Promise").

Information on resident satisfaction has not been collected since the ALMO was brought in-house. Prior to bringing the ALMO in house, BHP saw 50% leaseholder and 66% tenant satisfaction with overall services.

## Appendix 4 | Case Studies: 'Thin' ALMOs

### Lewisham Homes

#### Key learning points from case study

- Focussed on delivering housing – achieving very low costs
- Has seen satisfaction rise from 58% to 77% over a ten-year management period to 2017, an improvement over in-house management levels.

Lewisham Homes is an ALMO, which was established in January 2007 and manages approximately 13,000 tenanted and 5,000 leasehold homes on behalf of LB Lewisham. Lewisham is an inner London borough.

Lewisham Homes is an example of a 'thin ALMO'. This means that it focuses primarily on developing excellence in its core housing business, rather than expanding into a range of other services, although Lewisham Homes is also delivering new build homes on behalf of the Council. To deliver a strong housing offer, Lewisham Homes has identified four strategic objectives:

1. Providing Excellent Services
2. Developing Thriving Neighbourhoods
3. Planning for a Sustainable Future
4. Being an Employer of Choice

As the business includes only core housing services, Lewisham is able to focus on delivering these, rather than having to manage other priorities and business types. It is successfully delivering on its capital programmes and provides a low-cost service. Since 2013/14 Lewisham Homes has been acting as a developer on behalf of LB Lewisham for new social housing.

Lewisham Homes has a strong relationship with its sponsoring Local Authority, LB Lewisham. In 2013/14 Lewisham Council considered the future of the ALMO and decided that future management of its housing stock in the short-term would be by the ALMO. In 2017, a consultation with residents saw the extension of the contract with Lewisham Homes for an additional ten years through to 2027.

Lewisham Homes has a strong resident engagement strategy. Local engagement is facilitated through over 30 tenants and residents' associations, three areas panels and a combined area panel, two TMOs, and several assemblies, partnership boards, forums and improvement groups. A resident inspection programme helps Lewisham Homes monitor the quality of their resident engagement service.

Lewisham homes publishes annual reports that cover key outreach activities and involvement in them as well as reporting on performance data. From the 2017/18 report, performance is getting better via a 15% rise in telephone response rates and the ALMO is offering more community outreach activities such as training and health and wellbeing activities.



## Sutton Housing Partnership

### Key learning points from case study

- Focused on delivering housing and support services with no additional business services
- SHP has been restructured to place residents at the heart of the organisation, ensuring core delivery services are fit for purpose

SHP is an ALMO, which was established in 2006 and manages approximately 6,000 tenanted and 1,500 leasehold homes on behalf of LB Sutton. Sutton is an outer London borough.

SHP is an example of a 'thin ALMO'. This means that it is focussed on developing excellence in its core housing business, rather than expanding into a range of services. SHP identifies its priorities as the following:

- Bring all properties up to the Decent Homes Standard and continue to improve and maintain them as an asset for the future
- Provide high quality responsive repairs and cyclical maintenance services
- Invest in and improve estate grounds and the communal areas of flatted blocks
- Provide excellent tenancy management and leasehold services, and create attractive neighbourhoods where people feel safe and want to live
- Ensure all customers have access to services and that the diverse needs of tenants and leaseholders are met
- Promote and maximise the opportunities for customer involvement with service delivery.
- 

In April 2017, LB Sutton reviewed its housing management options and decided that the preferred route forward for the management of Sutton's housing management services was to retain SHP but recast it to be an even more community-centred organisation, with the management agreement extended to 2021. Other options included stock transfer, bringing the ALMO in-house and exploring partner services with RB Kingston.

SHP has a Federation of Tenants, a Residents Association, and a Sutton Leaseholder Association; in 2013, SHP received the Tenant Participation Advisory Service Accreditation for Excellence (TPAS).

## Appendix 5 | Case Studies: 'Diversified' ALMOs

### Barnet Homes

#### Key learning points from case study

- There are a wide range of services which ALMOs can deliver
- ALMOs can take on services that were previously managed by the Local Authority or can expand commercially.

The Barnet Group is made up of an ALMO – Barnet Homes, established in 2004; a social care company – Your Choice Barnet (YCB); Bumblebee – an online estate agent; and an employment company. They manage 15,000 council homes, including 3,900 leasehold properties. Barnet Homes and YCB were established in February 2012. Barnet is an outer London borough in North London.

Barnet Homes, which now includes Opendoor Homes – a Registered Provider of social housing, is an example of a 'Diversified ALMO'. The Barnet Group has taken on a large range of services beyond its original core housing and asset management functions. These include services previously delivered by the Council, as well as entirely new services that are being sold commercially. Additional services provided by the Barnet Group include:

- Housing options service delivered for the Council
- Private sector lettings agency (Let2Barnet)
- Personal alarm and monitoring service (also offered in Brent)
- Consultancy services
- Housing development
- Adult social care day centres
- Short break respite service
- Supported living services in people's homes.

The comparative breadth of the Barnet Group's offer enables the group to 'combine a public sector ethos with a private sector commercial focus'. The Barnet Group has a mix of income streams, including the HRA and the General Fund.

Barnet Group's community engagement strategy is aligned with strategic objectives of the Council. Through this, they offer a number of involvement opportunities for residents, including a resident involvement database called "Viewpoint". They also have a performance advisory group consisting of twelve tenants and leaseholders, a resident support group, a key leaseholder scheme and several residents' associations and community groups.

## Homes for Haringey

### Key learning points from case study

- The Council should understand its strengths and the financial motivators for taking its ALMO in-house
- ALMOs can take on services that were previously managed by the Local Authority or can expand commercially.

Homes for Haringey provides housing management services for 21,000 homes, including 16,000 social and 5,000 leasehold homes. Homes for Haringey has its own in-house repairs service.

In 2017, Homes for Haringey expanded its services to provide care and support services for 51 supported schemes housing 1,400 older people in the borough.

Homes for Haringey provides a number of services on behalf of the Council. These include:

- Homelessness applications
- Housing advice
- Temporary Accommodation
- Private Sector Lettings
- Domestic Violence Support

In 2015, LB Haringey undertook a housing management options review and decided to retain its ALMO with consideration of the following:

- The complexity of the decision on how to manage its stock
- Councils using a mixed option
- Financial issues and how they influence choices
- Focus on tenants
- Taking a holistic view of housing providers and how they work with tenants
- How the choice affects external funding
- The Council being honest about its strengths and skills gaps

In 2017, a consultation ran on the housing management agreement. The Council concluded:

- Homes for Haringey has significantly improved its performance over the last five years. The ALMO has made significant savings and taken over new services improving them in a relatively short timescale
- There is not a compelling case that bringing the service back in-house would lead to an increase in tenant satisfaction or make a significant impact on the capital funding deficit or the savings needed to improve the overall HRA financial position

On the basis of this review the management agreement was extended by 10 years with a 5-year break clause and expires March 2026.

- Homes for Haringey has a resident engagement strategy with several options for resident engagement including a complaints panel, residents associations and a leaseholder panel.

## Nottingham City Homes

### Key learning points from case study

- ALMOs can take on additional services while maintaining high performance
- Diversified ALMOs can also be tenant focused organisations with a strong commitment to their communities

Nottingham City Homes provides housing management services for 27,000 homes in Nottingham, including providing services for approximately 1,000 leaseholders. Nottingham City Homes has a unique group structure including an RP to access grant to provide new homes in Nottingham and a commercial vehicle to offer market rent homes let on longer-term tenancies.

Due to the HRA cap, Nottingham City Council was constrained by its ability to deliver housing and so looked to its ALMO to deliver additional services.

Today, Nottingham City Homes is an example of a 'Diversified ALMO', an ALMO which has taken on a large diversity of services beyond its original core housing and asset management functions. These include services previously delivered by the Council, such as managing the city's housing register, re-letting empty homes and rent collection and arrears recovery as well as entirely new services that are being sold commercially. Additional services provided by the Nottingham City Homes include:

- Letting at market rent via a commercial vehicle subsidiary
- In-house construction
- Managing a homelessness hostel
- Supported housing services (Nottingham On Call)
- Health and Wellbeing programmes
- Learning and Skills Programmes
- Anti-social behaviour and crime tackling programmes in partnership with others

Nottingham City Homes prides itself on being a tenant-led and tenant-focused organisation. Its corporate goals include to listen to tenants and to diversify services to reinvest into communities. The 2018 UK Housing Awards saw Nottingham City Homes awarded Landlord of the Year, Innovation of the Year (over 12,000 homes) and Outstanding Approach to Tenant Involvement.

Since the Council's review of the ALMO in 2013, it is understood that performance of the ALMO has exceeded expectations and the Council has recently announced its intention to agree a new 30-year management agreement with the ALMO, with reviews every 3 years.

NCH has several tenant board members, and several tenant panels such as a customer excellence panel, a complaints panel, and communications panel and an equalities panel. NCH also runs a learning and development service called "Tenant Academy" which includes courses in money management, food safety, events management, bookkeeping and first aid.

## Glossary

**ALMO - Arm's Length Management Organisation** - A not-for-profit organisation set up by a local authority for the purpose of managing the authority's stock. Under such arrangements, ultimate ownership of properties usually remains with the local authority.

**ASB - Anti-Social Behaviour** - (As per the Crime and Disorder Act 1998) - Acting in a manner that has caused or was likely to cause harassment, alarm or distress to one or more persons not of the same household as the acting individual.

**GLA - Greater London Authority** - A top-tier administrative body responsible for the strategic administration of Greater London, consisting of a directly elected Mayor and a 25-member London Assembly responsible for scrutiny of the Mayor and the GLA's activities. The GLA was created to improve co-ordination between local authorities in Greater London.

**Homes England** - A non-departmental public body responsible for the funding of new affordable housing in England.

**HRA - Housing Revenue Account** - The account in which a local authority's housing revenue (e.g. rent) and housing costs (e.g. property management and maintenance) are kept. By law, the Housing Revenue Account sits separately from the authority's non-housing related revenue and costs.

**RtB - Right to Buy** - The Right to Buy scheme is a government scheme designed to support eligible council and housing association tenants in England to buy their home with a discount.

**Teckal Exemption** - An exemption by which a contracting authority looking to procure services from a legally distinct entity (usually a company that the authority has set up) can treat the procurement as an in-house administrative arrangement rather than a formal contract. The application of the exemption is subject to a number of conditions being met: that the service provider carries out the principal part of its activities with the authority; that the authority exercises the same kind of control over the service provider as it does over its own departments; and that there is no private sector ownership of the service provider nor any intention that there should be any.

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## Appendix Two

### RESIDENT CONSULTATION

This appendix summarises the views expressed by residents via email and telephone calls as part of the consultation period in May and June 2019. The views are set out in two sections – concerns and positive recognition

#### SERVICE CONCERNS

Tenants	Leaseholders	Residents
Repairs Service: When the operatives arrive they either have got the wrong tools and, sometimes the wrong person has arrived. The jobs are “not always completed on first visit”.	The THH extension requires wider consultation rather than the focus/seminar group held with Altair and the letters sent out to all residents by the Mayor inviting comments.	Parkview Estate: poor delivery of the major works programme and in parts works not completed.
The ALMO structure is difficult for tenants/residents. The double layer of governance means that THH are able to say "we need to consult with the landlord", LBTH. Tenants and residents cannot speak to the landlord so can't move things forward.	General poor customer service and leaseholders feel they are overpaying for services. THH staff are viewed as rude and unhelpful and unwilling to help.	Major works bill are too high and there is a feeling of being ripped off by THH.
Dealing with THHs and their Contractors caused serious stress to the point where one resident had to seek counselling support.	Annie Besant Close: Repeatedly raised concerns about anti-social behaviour on the street (day and night), including drug dealing, but have not seen any support for THH.	THH's 'Here to help' is not a good local service.
Tower Hamlets Homes are not doing their duty to properly maintain a listed building and keep it in acceptable condition for its residents.	Lack of clarity on invoice payments (new invoicing method i.e. in line with the lease) leaseholders are asked to pay up front, but with no start date for the works.	Too many complaints made to THH, but we feel ignored.
Repairs Service: Poor supervision or no supervision from THH on repairs contractors for both day to day and major works including communications between THH and their contractors.	Anne Goodman House: All the works were carried out poorly and no one from THH or the Council came to inspect or check the quality of work that was carried out.	Lack of supporting information behind the increased resident satisfaction.

<p>LBTH proposal to allow THH build new home is not a good idea – to preserve the green spaces; noise and disruption would be experienced by residents; rooftop new build would impact on light; and the Council might sell to private individuals rather than house local people in need.</p>	<p>Fire safety management: A heavy handed approach adopted by THH at Matilda House. Some residents received injunction notices for not allowing THH officers even though London Fire Brigade had attended. Furthermore, THH advice contradicted the recommendations set out by the London Fire Brigade (LFB). The LFB was happy with the fire safety standards in the block.</p>	<p>Poor estate cleaning, permanent caretakers would help to keep the estate better maintained.</p>
<p>There is no Council Estate parking enforcement.</p>	<p>Increasing service charges year on year.</p>	<p>THH staff are appalling and complaints are treated as a joke.</p>
<p>Unauthorised vehicles parking in the street aren't warned or ticketed, especially in the evenings, and repeated calls to the enforcement company (at a high call cost) results in no action or increased patrols.</p>	<p>Lack of adequate communications with THH through emails and phones including providing updates to leaseholders on on-going issues.</p> <p>Lack of transparency on the part of THH when requests are made by leaseholders.</p>	<p>Just one main contact telephone number to get through to THH.</p>
<p>Lack of communications with THH – email direct system to relevant managers/team leaders removed. Notice boards from estates removed. Managers or Senior officers not attending resident association monthly meetings.</p>	<p>Matilda House: Threatening behaviour and bullying from THH staff and lack of general communications and consultation with residents.</p>	<p>Poor level of customer service and generally THH are just useless so bring them back in.</p>
<p></p>	<p>Annie Besant Close: Repeatedly raised concerns about anti-social behaviour on the street (day and night), including drug dealing, but have not seen any support for THH.</p>	<p>Concerned with the proposal that will allow THH to build new homes.</p>
<p></p>	<p>Insurance for the block has risen considerably over the last few years.</p>	<p>Resident satisfaction is not increasing.</p>
<p></p>	<p>The Timetable for capital programme works in particular communal decorations and door entry system keeps moving forward.</p>	<p></p>
<p></p>	<p>Matilda House: Lack of effort in maintaining the building.</p>	<p></p>
<p></p>	<p>General mistrust by residents and deep dissatisfaction with services provided by THH.</p>	<p></p>



## POSITIVE RECOGNITION

<b>Tenants</b>	<b>Leaseholders</b>	<b>Residents</b>
Very good housing management and lots of improvements in the borough. THH are excellent. Totally support and hope that the Council extend the existing Tower Hamlets Homes management agreement from July 2020.	Staff in the various departments/contact points have without exception been excellent and helpful. THH staff are very fast, responsive and helpful. Handle enquires very well and are very responsive on the phone.	Substantial progress made since 2015 with clear political leadership from both the Mayor and Cabinet Member of the ALMO – Cllr Islam.
Collingwood Estate Tenants and Resident Association: We welcome the Mayor's intention to extend the council's management contract with Tower Hamlets Homes for up to eight years.	As part of the renewal of their contract could you please insist that THH simplify the contact process for users, review/streamline (and speed up) their internal processes substantially and, not least, share the substantial cost benefits via the Council with us?	Cllr Islam has been fully committed to ensuring the ALMO provides an excellent service to residents.
Completely satisfied with the Tower Hamlets services. When an issue arose, THH have been always present and solved it asap.	Lots of progress since 2015, in particular tackling ASB and fire safety.	
Extend the existing Tower Hamlets Homes management agreement up to 2028 is the best option. Please don't take us back to those dark old days!	General satisfaction with the way THH has managed their housing.	
Substantial progress made since 2015 with clear political leadership from both the Mayor and Cabinet Member of the ALMO – Cllr Islam.		
Cllr Islam has been fully committed to ensuring ALMO provides an excellent service to residents.		
The work done and ongoing around Fire Safety is remarkable the speed and efficacy of THH staff is outstanding.		

Resident engagement has improved and there is now a proper meaningful consultation and involvement. The financial health centre is an amazing resource. Caretaking is exceptional and the ASB team is committed.		
Strong leadership at THH has proved the point and long may that continue.		
Moving services back in-house would be too disrupting for the residents.		
THH should continue but they need to be more efficient when it comes to regulating the repairs service.		
THH achieving the National recognition of Landlord of the Year.		
THH are doing a very good job. Please don't repair something that isn't broken - provided it continues to work of course.		

Appendix 3

## Executive Mayor's Office

Tower Hamlets Town Hall  
Mulberry Place  
5 Clove Crescent  
London E14 2BG

housing.strategy@towerhamlets.gov.uk  
www.towerhamlets.gov.uk

Dear resident,

## Consultation on the review of Tower Hamlets Homes

I am writing to update you on the future of Tower Hamlets Homes, an organisation created in 2008 that manages and maintains council housing on behalf of the council.

In July 2018, the contract with Tower Hamlets Homes was extended for two years, and the council must now decide what will happen from July 2020 onwards.

The council commissioned Altair Ltd, an independent housing consultancy, to review our options for the future.

The specific options examined by Altair were to:

1. Bring all Tower Hamlets Homes services back in-house.
2. Extend the existing Tower Hamlets Homes management agreement, or
3. Extend the existing Tower Hamlets Homes management agreement and shift some services between the council and Tower Hamlets Homes.

We want to choose the option that will ensure the best possible housing service to residents, securing fire safety and improving the council's physical assets.

I am now publishing the Altair report on our website so all tenants and leaseholders can read their findings and recommendations. You can find this online here:

- [www.towerhamlets.gov.uk/THHConsultation](http://www.towerhamlets.gov.uk/THHConsultation)

**Taking into account the findings and recommendations from Altair, I am currently minded to extend the council's management agreement with Tower Hamlets Homes for up to eight years (to 2028), with a possible break after four years (in 2024).**

There are a number of reasons why I think this is the best way forward. Tower Hamlets Homes has had a number of successes:

- Housing management service performance has improved.
- Resident satisfaction has steadily increased.
- Provided better value, so far saving over £4 million in the last three years.

Not extending the contract, and moving the service back into the council, risks disruption to Tower Hamlets Homes' service improvements and the continuing benefits for residents.

I am also proposing to explore the scope for additional service transfer options from the council to Tower Hamlets Homes, in a limited number of areas:

- New build, for example delivering new build homes on rooftops, and possible in-fill schemes.
- Aspects of private sector management powers where these can help better resolve management problems on estates.
- Management of acquired temporary accommodation and possibly homes not owned by Tower Hamlets Homes.

**Before I make a final decision, I am interested to hear your views on this proposal and on Tower Hamlets Homes and the service it provides.**


Please email your comments to [housing.strategy@towerhamlets.gov.uk](mailto:housing.strategy@towerhamlets.gov.uk) or you can telephone **020 7364 7037**.

The closing date for comments is midnight on **10 June 2019**.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Biggs', with a long horizontal line extending to the right.

**Mayor John Biggs**  
Executive Mayor of Tower Hamlets

<p><b>Cabinet</b></p> <p>31 July 2019</p>	 <p><b>TOWER HAMLETS</b></p>
<p><b>Report of:</b> Ann Sutcliffe- Acting Corporate Director, Place</p>	<p><b>Classification:</b> Unrestricted</p>
<p><b>Progress on Tackling Air Quality</b></p>	

<b>Lead Member</b>	<b>Councillor Rachel Blake, Deputy Mayor Regeneration and Air Quality</b>
<b>Originating Officer(s)</b>	David Tolley- Head of Environmental Health and Trading Standards
<b>Wards affected</b>	All wards
<b>Key Decision?</b>	No
<b>Forward Plan Notice Published</b>	13 December 2018
<b>Reason for Key Decision</b>	N/A
<b>Strategic Plan Priority / Outcome</b>	<b>A borough that our residents are proud of and love to live in/People live in a borough that is clean and green</b>

### Executive Summary

Poor air quality has an impact on the health and quality of life of all in Tower Hamlets and London. The Council has a statutory duty to comply with the London Local Air Quality Management (LLAQM) Regime under the Environment Act 1995.

In 2017 Cabinet approved an Air Quality Action Plan (AQAP) which sets out the action the Council will take to improve air quality within the borough over a 5 year period 2017-2022. This report summarises the progress being made by the Council in delivering the AQAP.

### Recommendations:

The Mayor in Cabinet is recommended to:

1. Note the progress the Council is making in implementing the Air Quality Action Plan 2017-2022.
2. Approve the consolidation of the Air Quality Partnership Board with the Health and Wellbeing Board.
3. Note the specific equalities considerations as set out in Paragraph 4.1

## **1. REASONS FOR THE DECISIONS**

- 1.1 Under Part IV of the Environment Act 1995 Local Authorities have a duty to review and assess air quality in their area. Where levels of air pollutants exceed National Air quality Objectives set in the Environment Act, measures must be developed to reduce emissions towards achieving the air quality objectives.

## **2. ALTERNATIVE OPTIONS**

- 2.1 This is an updating report so there are no alternative options to consider.

## **3. DETAILS OF THE REPORT**

- 3.1 Poor air quality has significant impact on the health and quality of life of all in Tower Hamlets and London ranging from worsening respiratory symptoms and poor quality of life to premature deaths from cardiovascular and respiratory diseases. It causes 9,400 early deaths in London every year due to exposure to particulate matter (PM) and (Nitrogen dioxide) NO<sub>2</sub><sup>1</sup>.
- 3.2 In Tower Hamlets it is forecast that 15% of exceedances will be in Tower Hamlets due to pollution levels being over the National Air Quality Objective levels, the second highest London borough. Despite forecasts in reductions in pollution in 2025 Tower Hamlets will be one of the four London boroughs with exposure above National Objective levels . A 2015 report by Kings College has estimated the additional deaths attributed to air pollution in Tower Hamlets based on 2010 air pollution data. For particulate matter and NO<sub>2</sub> it was calculated that there were up to 158 attributable deaths . Studies, including one carried out in Tower Hamlets, show that children's health is being negatively affected living in highly polluted areas. Children in Tower Hamlets have reduced lung function due to poor air quality which they may never recover.
- 3.3 Where local air quality does not meet the National Air quality Objectives, the Council must declare an air quality management area (AQMA) and produce an air quality action plan (AQAP) to take actions to improve air quality. The AQAP is a statutory document.
- 3.4 The whole borough of Tower Hamlets was declared an Air Quality Management Area in 2002 due to the high concentration of NO<sub>2</sub> and Particulate Matter (PM<sub>10</sub>). The Council is now meeting EU limits for PM<sub>10</sub>. There is however exceedance of the World Health Organisation air

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<sup>1</sup> Understanding the Health Impacts of Air Pollution in London  
<https://www.scribd.com/document/271641490/King-s-College-London-report-on-mortality-burden-of-NO2-and-PM2-5-in-London>

quality guideline for this pollutant. Local authorities are also expected to work towards reducing emissions and concentrations of PM<sub>2.5</sub>.

- 3.5 The Council is committed to improving local air quality and public health. The Council has retained the “Clean Air Borough” (CAB) status issued by the Mayor of London. This is awarded in recognition of local authorities that are working hard to improve air quality within their borough and have submitted the Annual Status Report (ASR) on time. CAB status is reassessed annually.
- 3.6 The Council’s AQAP was revised and updated in October 2017. This sets out the action the Council will take to improve air quality within the borough over a 5 year period from 2017-2022. It can be found here and in Appendix 1; [https://www.towerhamlets.gov.uk/Documents/Environmental-protection/LBTH\\_Air\\_Quality\\_Action\\_Plan.pdf](https://www.towerhamlets.gov.uk/Documents/Environmental-protection/LBTH_Air_Quality_Action_Plan.pdf)
- 3.7 The current five year AQAP was prepared by the Environmental Health & Trading Standards Service (EHTS) following consultations with the Senior Officers from the following departments (the majority which sit in Place):

Transport and Highways – Head of Engineering  
Planning – Divisional Director, Planning & Building Control  
Fleet Management – Fleet Manager  
Public Health - Director of Public Health  
Procurement – Head of procurement  
Waste Strategy – Head of Waste Management  
Sustainability – Service Manager- Energy & Sustainability

A full public consultation was also carried out before adopting the AQAP.

- 3.8 In order to make clear accountability and responsibility for delivery of actions, the AQAP considers priorities under nine broad categories. A senior officer from an appropriate service has been appointed as the lead for each work stream:

- Public Health and awareness raising,
- LLAQM, Development and buildings,
- Major infrastructure projects,
- Delivery servicing and freight,
- Borough fleet/council contracted fleet actions,
- Localised solutions,
- Cleaner transport,
- Lobbying and Partnership.

- 3.9 There are in total 76 actions with clear timescales for implementation including milestones and expected outcomes. Some action plans are to be delivered within a short timescale and others run for the duration of the AQAP. Each action has been RAG-rated. At the time of this report, 10 Actions have been completed, 48 are green, 13 amber and 1 red. The action in red is action point 68 “**Lobby and work with TFL to reduce emissions from TfL controlled roads e.g. through reprioritisation of road space**”. Update

received in February 2018 from lead stakeholder, the Highways service: *“Lead Members being briefed about the conflicts of this action with the overall desired results. NO ACTION TO BE PURSUED UNTIL THE ACTION IS REVISITED. The target as currently expressed could conflict with aspirations for improvement of local neighbourhoods (i.e. by diverting traffic from trunk roads to local roads). This action will be reviewed to ensure that lobbying is focussed on appropriate actions and outcomes in relation to road space allocation and design”.*

*“Lead Members briefed on the conflict with policies – this could worsen environmental quality on local roads”.*

- 3.10 There is a requirement to update the action plan every five years at a minimum, and progress against the action plan is to be reported to the GLA and DEFRA annually. The AQAP is a live document and should be continually reviewed and developed to ensure current measures are progressing and new measures are brought forward.

### **Governance and Monitoring of the Air Quality Action Plan**

#### **(i) Air Quality Partnership Board**

- 3.11 In order to ensure oversight of the implementation of the agreed air quality actions, the Council has created an Air Quality Partnership Board (AQPB), ensuring timely and effective delivery and reporting. The terms of reference for the board can be found in Appendix 2.
- 3.12 The board is chaired by the Deputy Mayor and lead Member for Air Quality. The board meets on a quarterly basis. The first meeting took place on 20<sup>th</sup> December 2017. These meetings serve as an opportunity to feedback on progress on the respective actions for each service area.
- 3.13 The board has not functioned as intended to supervise delivery of the Action Plan. At the AQPB meeting on 5<sup>th</sup> March 2019, the possibility of oversight of the AQAP as part of the Health & Wellbeing Board was raised going forward. The membership of the group was asked their view on this and no objections were raised. In addition to this the following proposals for strengthening the governance of the plan are also currently being considered:
- Attendance of a named officer from each department as set out against each item in the Action Plan should be a requirement,
  - Appointment of a Corporate Director as ‘lead’
  - A written report against each action for that department should be submitted to the Partnership Board in advance of the meeting together with any additional air quality related actions not specifically in the AQAP being undertaken which are not already in the plan.
  - There is a need to ensure that other Services consider Air Quality as central to their policy development,



- All policies should have commentary on the potential impact on Air Quality – this is currently included in the report templates but rarely responded to.

3.14 Statutory guidance from DEFRA states “Of paramount importance in ensuring the Action Plan fulfils its goal in producing quantifiable outcomes to timescale is the need for **all delivery partners** who have an influence on air quality to take responsibility for their actions and to engage constructively in the process. This is especially important as certain measures may have knock-on effects for other policy areas”.

### ***(ii) Air Quality Steering Group***

3.15 There is also an officer level meeting held a month before the AQP meeting to discuss agenda items, and to discuss and raise concerns about particular items. Officers from key stakeholders responsible for delivery of action points are represented.

### **Air Quality Action Plan Progress**

3.16 It is a requirement for all London Boroughs that an annual status report (ASR) is submitted annually to DEFRA and copied to the Greater London Authority (GLA). This is to provide an update on air quality monitoring over the previous calendar year and comparison of levels against the air quality objectives as well as progress on actions within the air quality action plan.

3.17 The overall responsibility for the implementation of the plan sits within the Environmental Health and Trading Standards Service (EHTS) supported by Strategy and Programmes. The EHTS has two dedicated officers (Air quality Officer and an Air Quality Assistant) for the coordination and delivery of the plan including liaison and follow up with key stakeholder departments.

3.18 As part of the annual statutory reporting on the AQAP progress, the EHTS service prepare and submit an annual status report to DEFRA and the GLA.

3.19 The ASR report for the calendar year 2017 was submitted in May 2018. Progress on the action plans in table 4.1 of the AQAP only covers the period October 2017 – December 2017 as the AQAP was adopted in October 2017. Copy of the report is included in appendix 3. The Council’s 2018 ASR report is in preparation and will be submitted in July 2019.

3.20 The feedback received on the Council’s 2017 ASR is that the GLA agrees that the Council has made good progress towards the AQAP measures in 2017.

3.21 The AQAP is a live document and is continually being updated and reported to the AQP meeting on a regular basis. Latest copy of the AQAP matrix can be found in appendix 4.

- 3.22 The air quality monitoring results for 2017 indicate a slight decline in air pollutant concentrations close to major roads. However away from major roads there is no clear trend.
- 3.23 There are 3 automatic monitoring stations maintained by the council which continually monitor NO<sub>2</sub>. PM<sub>10</sub> is monitored at two sites. Recently new PM<sub>2.5</sub> monitors have been added to the Victoria Park and Mile End monitoring sites, making Tower Hamlets one of the few London Councils to monitor PM<sub>2.5</sub>. Transport for London runs a further real time monitoring station on Blackwall Tunnel Approach Road. There is also a network of 90 nitrogen dioxide diffusion tubes across the borough. These are passive monitors which record the monthly average nitrogen dioxide levels. Monitoring results are available on the Council's website [https://www.towerhamlets.gov.uk/ignl/environment\\_and\\_waste/environmental\\_health/pollution/air\\_quality/pollution\\_monitoring.aspx](https://www.towerhamlets.gov.uk/ignl/environment_and_waste/environmental_health/pollution/air_quality/pollution_monitoring.aspx).
- 3.24 The 2017 ASR and the AQAP matrix show the Council is making good progress on delivering the action plans agreed in the AQAP. Of particular note:
- **Action Point 1** -An innovative borough wide 'Breathe Clean' campaign launched to reduce pollution levels and encourage behaviour change. The campaign is using various platforms including social media to raise awareness and engage residents. The campaign has been well received so far including retweets by the Government.
  - **Action Point 6** -Promoted the airText messaging service to warn residents when high pollution levels are forecast. This is a London wide free service for the public providing air quality alerts by SMS text message, email and voicemail and 3 day forecast of air quality across greater London. 272 subscribers registered in 2018.
  - **Action Point 9** - Working with the GLA delivered two air quality audits for two primary schools, Marner and Bonner. Two further audits have been undertaken at two nursery schools, Columbia Market and Alice Model. The reports to these further audits are awaited.
  - **Action Point 10** -Schools anti-idling project. A total of 5 anti-idling events delivered in 2018/19 at Bonner, English Martyrs, St Lukes, Globe school and Mayflower schools. 50 anti-idling signs were delivered to schools for installation by schools.
  - **Action Point 11** -Funded 20 environmental theatre productions workshops to local primary schools to teach children how their travel choices affect air quality. Appendix 5 provides more details about all the different air quality improvement projects the Council is working on with schools in the borough.
  - **Action Point 13** - Funded a Citizen Science air quality monitoring project to engage and raise awareness about air quality in the borough. 79 residents

registered interest in the scheme and 29 locations were monitored by residents using NO<sub>2</sub> diffusion tubes. The final report is available on the Council's website.

- **Action Point 46** Fleet has committed to the replacement of all light duty diesel vehicles at the end of their service life where equivalent electric vehicles exist. They are currently working on specifications for fleet from refuse collection vehicles, street sweeping vehicles, transit van type vehicles, small vans, 3.5 Tonne transit tipping vehicles and larger 7.5 Tonne caged tipping vehicles.
- **Action Point 54** - New green walls to be installed at St Lukes and Olga schools and beside the A12 following successful bids to the Tower Hamlets Mayor's AQ fund. Installation of Green walls is being considered by Bonner and Marners Schools as part of the GLA school audit. Marners Primary School has been awarded £30,000 by the GLA to green the school playground in Bromley-by-Bow, Tower Hamlets. The project will include tree and hedgerow planting, a green screen, a green gateway and establishing a forest school.
- **Action Point 56 – ZEN** project engaging with business in the city fringe area as part of a tri borough (Hackney, Tower Hamlets and Islington) consortium. Project funded by grants from the London Mayor's Air Quality Fund (MAQF) and match fund contributions from each Council. A total of 28 grants have been awarded to local businesses in Tower Hamlets towards helping the businesses to change to cleaner mode of transport. The ZEN project has been hailed as a good practice by DEFRA. Phase 2 of the MAQF ended on 31 March 2019. Continuation of the project is subject to securing further funding from the MAQF and match funding from each local authorities from s106 pot. A joint bid has been submitted but decision will not be known until around May 2019.
- **Action Point 57** - Introduced new powers to issue fixed penalty notices (FPN) to drivers who idle their engine unnecessarily. A borough wide publicity campaign was carried out including putting up anti-idling signs in hotspot locations. Officers are undertaking anti-idling enforcement visits to targeted locations and schools where complaints from residents have been received. An anti-idling information leaflet is handed out to anyone who is asked to switch off their engine. No FPNs have been issued to date as drivers complied with requests to switch off engine. Appendix 6 – idling enforcement plan, shows locations visited/to be visited. New locations are added as they're reported. As part of this campaign the Council has particularly targeted schools to raise awareness of idling issues. Idling from ice cream vans in parks has been a particular concern for some residents of the borough. The Parks service will explore the feasibility of installing electric charging points for ice cream vans to plug into, to avoid keeping their engine on when in the parks.
- **Action Point 58** - There are currently 130 sole car club bays in Tower Hamlets at 81 separate locations which are offered for the round trip model. The Council also offers the point to point car club model with DriveNow,

ZipCar and Ubeeqo and we are in discussions with a further company. All of these car club companies use ultra-low emission vehicles and there are some that use electric vehicles as part of their fleets.

- **Action Point 61 & 62** - Introduced 10 residential electric charge points in the borough. More are planned. Sites for 15 medium charge bollards agreed and installation progressing – these will provide 37 charging points between them. Discussions continuing with TfL on siting of 6 Rapid Charge Points. Electric Vehicle Charge Point Strategy has targets of minimum of 150 on street charge points by 2025, with an aspirational target of 300 (including rapid chargers which has now been adopted by Council as the core target.
- **Action Point 72** -Introduced a £200,000 Mayor of Tower Hamlets Air Quality Fund for improving air quality in Tower Hamlets to be implemented over 2018/19 and 2019/20. The offer of grants has really engaged the local community. The first round (1<sup>st</sup> June 2018 to 31 July 2018) attracted 18 applications from which 8 grants totalling £78,811 have been awarded to resident groups, schools and housing associations. The second round opened on 1 November 2018 and closed on 31 January 2019. A total of 40 applications were received for bids totalling £347,773. Officers from the EHTS have assessed the applications and shortlisted 13 applications totalling £118,617 for finance and senior manager sign off. Formal offers have been sent out to the successful bidders. Publicity by the Communications team will be carried and it is also proposed to arrange an air quality summit in 2019 to showcase the projects funded under this scheme.

### **London Mayor's Air Quality Fund (MAQF)**

3.25 This is funding provided by the Mayor to support projects by London boroughs to improve air quality. Round 3 of the MAQF closed on 11 January 2019 and would provide funding for 3 years 2019-2022. The Council has submitted 1 single bid for the Whitechapel low emission neighbourhood (LEN) and 6 joint bids with other local authorities. These are

- **Non Road Mobile Machinery Project** -This is a pan London project which looks to inspect construction sites to ensure that they are only using approved and lower-pollution machinery to support the Mayor's Non Road Mobile Machinery (NRMM) Low Emission Zone
- **London-wide anti-idling Project** -This is a continuation and extension of the existing scheme which LBTH participates in already. It requires adoption of anti-idling enforcement powers and a programme of enforcement which LBTH already undertakes.
- **Canal Boat smoke Project** - This project seeks to address the issue of smoke from solid fuel stoves on residential canal boats.
- **Tower Bridge anti-idling campaign**- The scheme proposes the installation of permanent screens with anti idling messages to be activated when the bridge is opened together with associated air quality monitoring.

- **Zero Emission Network** -Funding is being sought for the continuation of the existing ZEN project and extension of the project to the Whitechapel LEN area and Canary Wharf business area.
- **Clean Air hospital framework** - This framework is an innovative tool that works to improve air quality outside and inside the hospital, provides advice to help protect staff, patient and public health from air pollution and works with others to champion the case for clean air locally and nationally.

3.26 If successful the projects would contribute towards delivery of air quality improvements in the borough and enhance actions in the Council's AQAP. Decision is expected in May 2019.

### **DEFRA Air Quality Grant 2017/18**

3.27 In April 2018 the Environmental Health & Trading Standards service jointly with Poplar HARCA were successful in securing £107,864 air quality funding from DEFRA. The funding is being used to deliver a number of projects:

- Clean Van Commitment- part of a nationwide campaign by environmental charity Global Action Plan to lobby major fleet operators to switch to cleaner forms of transportation. The campaign will have a specific focus on Tower Hamlets, targeting companies with high volumes of vehicles which pass through the borough, as well as working with local schools to create a film for the local campaign. LBTH fleet service has already signed up.
- Breathe Clean Challenge – Engaging and encouraging local residents and organisations to replace short car journeys by walking, cycling or scooting. The challenge will take place in Spring 2019 for approximately 6 weeks, incorporating National Clean Air Day. Participants will be able to record their activities on a mobile App.
- Empson Street - Tackling highly localised air quality issues around Empson Street, where a residential street and primary school are located next to the A12 and a busy industrial estate with a cement works. A detailed scientific study with UEL will take place on Empson Street and Devas Street analysing levels and sources of air pollution and dust, while opportunities for installing green infrastructure are also being explored.

### **Proposed Legislative Framework**

Focus for Activity for 2019

3.28 Good progress has been made in delivering the Council's commitment to improving the air in the borough for its residents, with a number of activities already crystallised. The Council remains committed to delivering further improvements and the focus should now be to improve coordination of different air quality projects being undertaken by various stakeholders and also to encourage modal shift by further raising awareness and understanding of the issues.

3.29 For the year ahead key activities should focus on:

- Continue to raise awareness amongst residents of poor air quality and encourage switch to cleaner mode of transport including walking and cycling
- Maintaining the GLA Cleaner Borough Status
- Delivery of more electric charging points
- Delivery of the liveable streets projects
- Greening of the Council's own fleet service
- Delivery of the GLA MAQF funded project including pan London anti-idling and non-road mobile machinery initiatives (announcement of successful bidders pending)
- Implementation of parking changes to discourage multi zonal parking and to encourage modal shift. Also implementation of recently introduced diesel surcharge for parking permits
- Publish the annual status report by 3 July 2019

#### **4. EQUALITIES IMPLICATIONS**

- 4.1 There is often a strong correlation with equalities issues, as areas with poor air quality are also often the less affluent areas. A recent report to the GLA<sup>4</sup> concluded that Populations living in the most deprived areas are on average currently more exposed to poor air quality than those in less deprived areas. 46% of the LSOAs [lower super output area] within the most deprived 10% of London have concentrations above the NO<sub>2</sub> EU limit value. This is in contrast to 2% above the NO<sub>2</sub> EU limit value in the 10% least deprived areas.
- 4.2 Delivery of the AQAP will have a positive beneficial effect on all groups within the borough as the outcome will be to improve air quality for all in the borough but particularly the most vulnerable groups.

#### **5. OTHER STATUTORY IMPLICATIONS**

- 5.1 **Best Value Implications** – Delivery of the AQAP will help the Council in achieving the air quality objectives and demonstrate to external regulators that the Council is committed to improving air quality within its area. Improvements in air quality will benefit everyone in the borough.
- 5.2 **Consultations** – A full consultation with key stakeholders was undertaken as required by the Environment Act 1995 before adopting the AQAP.
- 5.3 **Environmental** –The AQAP has synergy with the Council's Climate Change strategy as some of the actions in the AQAP are relevant to tackling both air pollution and climate change.
- 5.4 **Risk Management** - The Council currently benefits from having a Cleaner Air Borough status from the GLA. Failure to deliver on or make progress on commitments made in the AQAP could result in the Council losing its Cleaner Air Borough status.

5.5 **Crime Reduction** – Recent research suggests improving air quality may play a role in reducing crime<sup>2</sup>

5.6 **Safeguarding** - There are no safeguarding implications.

## **6. COMMENTS OF THE CHIEF FINANCE OFFICER**

6.1 This report details the progress made in implementing the Air Quality Action Plan 2017-2020. The activities within the Action Plan are delivered by the Pollution Team and the associated costs will be contained within the current budget of £335,400.

6.2 Other resources available to support the delivery of the plan are:

- £200,000 of mayor's priority growth was allocated to provide an Air Quality Fund to finance grants to the local community aimed at improving air quality within the borough. Two rounds of grant applications have been received and awarded. The fund will be fully spent by the end of 2019-20.
- Defra Air Quality Grant £107,864 joint funding with poplar HARCA received to deliver a number of specific projects.
- London Mayor's Air Quality Fund (MAQF) bid submissions for funding of one single bid for Whitechapel low emission neighbourhood of £499,100 plus £103,050 match funding; and funding for six joint bids with other local authorities of £284,000 plus £78,000 match funding. Decision awaited.

## **7. COMMENTS OF LEGAL SERVICES**

7.1 This is an updating report on the progress of the Air Quality Plan 2017-2022. Part IV of the Environment Act 1995 ("the 1995 Act") requires the government to produce national air quality strategy setting out standards and objectives for improving ambient air quality in the UK.

7.2 Section 82 of the Act requires local authorities to review air quality in their area and assess whether the air quality standards specified in the National Air Quality Standards are being achieved. Section 83 of the Act makes it a duty for local authorities to designate an air quality management area ("AQMA") where air quality objectives are not being achieved or not likely to be achieved.

7.3 Once an area has been designated, Section 84 of the Act imposes a further duty on the local authority to carry out an assessment and then develop an Action Plan seeking to achieve the relevant air quality standards in the air quality management area. Section 84(1) states that a local authority may from

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<sup>2</sup> <http://www.lse.ac.uk/GranthamInstitute/publication/crime-is-in-the-air-the-contemporaneous-relationship-between-air-pollution-and-crime/>

time to time revise the action plan. This authority was declared an AQMA in 2002. Local authorities are required to act “in pursuit of the achievement” of the relevant air quality standards.

- 7.4 The London Local Air Quality Management (LLAQM) Technical Guidance 2016 requires the Action Plan to be updated every 5 years as a minimum to reflect the current policy and to improve effectiveness.
- 7.5 The Council is required when exercising its functions to comply with the duty set out in section 149 of the Equality Act 2010, namely to have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity between those who share a protected characteristic and those who do not, and foster good relations between those who share a protected characteristic and those who do not. Paragraph 4.2 of the report indicates that delivery of the Plan will have a positive beneficial effect on all groups.
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## **Linked Reports, Appendices and Background Documents**

### **Linked Report**

- NONE

### **Appendices**

- Appendix 1 - Air Quality Action Plan 2017-2022
- Appendix 2 - Terms of reference for the air quality partnership board
- Appendix 3 - Annual Status Report 2018
- Appendix 4 - Air Quality Action Plan Matrix
- Appendix 5- Schools air quality improvement/monitoring projects
- Appendix 6- Anti-idling enforcement plan

### **Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012**

- NONE

### **Officer contact details for documents:**

Muhammad Islam  
Nicholas Marks



## **London Borough of Tower Hamlets Air Quality Action Plan 2017-2022**



### **SUMMARY**

This Air Quality Action Plan (AQAP) has been produced as part of our duty to London Local Air Quality Management. It outlines the action the council will take to improve air quality in Tower Hamlets between 2017-2022.

Highlights of successful projects delivered through the past action plan include:

- Delivering a sustainable London Olympics
- Delivering Crossrail with reduced air quality impacts on residents and the environment
- Achieved targets for sustainable travel through the Staff Travel Plan and School Travel Plans
- Maintained the council's Ambient Air Quality Monitoring stations
- Managed emissions from council fleet through a Green Fleet Strategy and all fleet comply with the Low Emission Zone
- Successfully implemented all round one of the Mayor's Air Quality Fund projects including Zero Emissions Network and BARTS Health Project
- Implemented a cleaner air for schools project at Marner and Cubit Town Schools to engage pupils, teachers and parents on air pollution

Air pollution is associated with a number of adverse health impacts; it is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas<sup>1,2</sup>.

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<sup>1</sup> Environmental equity, air quality, socioeconomic status and respiratory health, 2010.

The annual health costs to society of the impacts of air pollution in the UK are estimated to be roughly £15 billion<sup>3</sup>. Tower Hamlets is committed to reducing the exposure of people in the borough to poor air quality in order to improve health.

We have developed actions that can be considered under nine broad topics:

- **London Local Air Quality Management:** Our statutory requirements under the LLAQM regime, such as annual reporting on pollution levels.
- **Developments and buildings:** emissions from buildings account for about 15% of the NO<sub>x</sub> emissions across London so are important in affecting NO<sub>2</sub> concentrations;
- **Major Infrastructure Projects:** Ensuring any major infrastructure projects in the borough do not adversely impact air quality;
- **Public health and awareness raising:** increasing awareness can drive behavioural change to lower emissions as well as to reduce exposure to air pollution;
- **Delivery servicing and freight:** vehicles delivering goods and services are usually light and heavy duty diesel-fuelled vehicles with high primary NO<sub>2</sub> emissions;
- **Borough fleet actions:** our fleet includes light and heavy duty diesel-fuelled vehicles such as mini buses and refuse collection vehicles with high primary NO<sub>2</sub> emissions. Tackling our own fleet means we will be leading by example;
- **Localised solutions:** these seek to improve the environment of neighbourhoods through a combination of measures;
- **Cleaner transport:** road transport is the main source of air pollution in London. We need to incentivise a change to walking, cycling and ultra-low emission vehicles (such as electric) as far as possible.
- **Lobbying and partnership working:** working with stakeholders including National Government, the Greater London Authority & Transport for London to ensure policies adequately address the issue of air quality.

Our priorities are:

- Implementing a network of publicly available electric vehicle charge points
- Instigating measures at schools to reduce emissions and exposure
- Raising awareness of the pollution issue and encouraging residents to reduce their impact
- Ensure air quality policies are strengthened in the new Local Plan to minimise impacts from the high levels of development in the borough
- To lead by example by upgrading the council fleet to include more Ultra Low Emission Vehicles and ensure the new Civic Centre is as sustainable as possible and has no adverse impact on the local air quality.
- Lobbying government for stronger national action on air quality and partnership working with the GLA, TFL and other stakeholders to ensure a joined up approach

You will see in this report that we have worked hard to engage with stakeholders and communities which can make a difference to air quality in the borough. We would like to thank all those who

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<sup>2</sup> Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006.

<sup>3</sup> Defra. Air Pollution: Action in a Changing Climate, March 2010

have worked with us in the past and we look forward to working with you again as well with new partners as we deliver this new action plan over the coming years.

In this AQAP we outline how the council plans to effectively use local levers to tackle air quality issues within our control.

However, we recognise that there are a large number of air quality policy areas that are outside of the council's influence (such as Euro standards, national vehicle taxation policy, taxis and buses), and so the council will continue to work with and lobby regional and central government on policies and issues beyond Tower Hamlet's influence.

## **RESPONSIBILITIES AND COMMITMENT**

This AQAP was prepared by the Environmental Protection Department of Tower Hamlets Council with the support and agreement of the following officers and departments:

Senior Management Team of the following Sections:

- Transportation and Highways
- Planning & Local Plan
- Fleet Management
- Public Health
- Procurement
- Waste Strategy
- Sustainability
- Environmental Health & Trading Standards

This AQAP has been approved by:

Councillor Rachel Blake – Lead Member for Development and Renewal & Air Quality

Mayor of Tower Hamlets – Mayor John Biggs

Director of Public Health – Somen Banerjee

Director of Place- Ann Sutcliffe

This AQAP will be subject to an annual review, appraisal of progress and reporting to the relevant Council Committee Mayors Advisory Board. Progress each year will be reported in the Annual Status Reports produced by Tower Hamlets, as part of our statutory London Local Air Quality Management duties.

If you have any comments on this AQAP please send them to Stefanie Hughes at:

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020 7364 5008  
[environmental.protection@towerhamlets.gov.uk](mailto:environmental.protection@towerhamlets.gov.uk)



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## **Abbreviations**

AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
AQO	Air Quality Objective
BEB	Buildings Emission Benchmark
CAB	Cleaner Air Borough
CAZ	Central Activity Zone
EV	Electric Vehicle
GLA	Greater London Authority
LAEI	London Atmospheric Emissions Inventory
LAQM	Local Air Quality Management
LLAQM	London Local Air Quality Management
NO <sub>2</sub>	Nitrogen Dioxide
NRMM	Non-Road Mobile Machinery
O <sub>3</sub>	Ozone
PM <sub>10</sub>	Particulate matter less than 10 micron in diameter
PM <sub>2.5</sub>	Particulate matter less than 2.5 micron in diameter
SO <sub>2</sub>	Sulphur Dioxide
TEB	Transport Emissions Benchmark
TfL	Transport for London

## **Introduction**

This report outlines the actions that Tower Hamlets plan to deliver between 2017-2022 in order to reduce concentrations of pollution, and exposure to pollution; thereby positively impacting on the health and quality of life of residents and visitors to the borough.

It has been developed in recognition of the legal requirement on the local authority to work towards air quality objectives under Part IV of the Environment Act 1995 and relevant regulations made under that part and to meet the requirements of the London Local Air Quality Management statutory process<sup>4</sup>.

## **1 Baseline air quality conditions in Tower Hamlets**

The UK Air Quality Strategy (AQS), released in July 2007, provides the overarching strategic framework for air quality management in the UK and contains national air quality standards and objectives established by the Government to protect human health. The AQS objectives take into account EU Directives that set limit values which member states are legally required to achieve by their target dates.

Tower Hamlets is meeting all of the national AQS objectives other than for the gas Nitrogen Dioxide (NO<sub>2</sub>). Tower Hamlets is meeting the current objectives for Particulate Matter (PM<sub>10</sub>) but as this pollutant is damaging to health at any level, this remains a pollutant of concern.

Nitrogen Dioxide levels are high across the borough with 40% of our residents living in areas of exceedance of the annual NO<sub>2</sub> objective and 48 of our schools (37 primary and 11 secondary) being located in areas of unacceptable NO<sub>2</sub> levels<sup>5</sup>.

### **1.1 Air Quality Monitoring**

Air quality is currently monitored across the borough through a network of both active and passive monitors. This includes four automatic continuous monitoring stations - two roadside and two background. The Blackwall tunnel monitoring station is managed by TFL and the other 3 are managed by Tower Hamlets. The automatic monitors monitor a range of pollutants, as per the table below.

**Table 1.1** Tower Hamlets Air Quality Monitoring Stations

<b>Location</b>	<b>Site type</b>	<b>Pollutants monitored</b>
Mile End Road	Roadside	NOx
Blackwall Tunnel Northern Approach	Roadside	NOx, PM <sub>10</sub> , PM <sub>2.5</sub> , O <sub>3</sub> , CO <sub>2</sub>
Victoria Park	Background	NOx, PM <sub>10</sub> , SO <sub>2</sub>
Millwall Park	Background	NOx, PM <sub>10</sub> , O <sub>3</sub>

Passive monitoring is carried out through NO<sub>2</sub> diffusion tube monitoring. There are 90 NO<sub>2</sub> diffusion tubes deployed across the borough giving us monthly average NO<sub>2</sub> concentrations.

<sup>4</sup> LLAQM Policy and Technical Guidance. <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-boroughs>

<sup>5</sup> London Atmospheric Emissions Inventory 2013 <https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory-2013>

Monitoring results are available online in real time for the automatic monitors and the diffusion tube results are uploaded to the Tower Hamlets website. A summary of the results is available in our most recent Annual Status Report.

### 1.2 Air Quality Modelling

The maps used below are taken from the London Atmospheric Emissions Inventory (LAEI) and use modelled data for the year 2013. The LAEI has been developed by the GLA as part of the implementation of the Mayors Air Quality Strategy. The 2013 dataset was the most recent available at the time of writing this report.

**Figure 1** Modelled map of annual mean NO<sub>2</sub> concentrations (from the LAEI 2013)

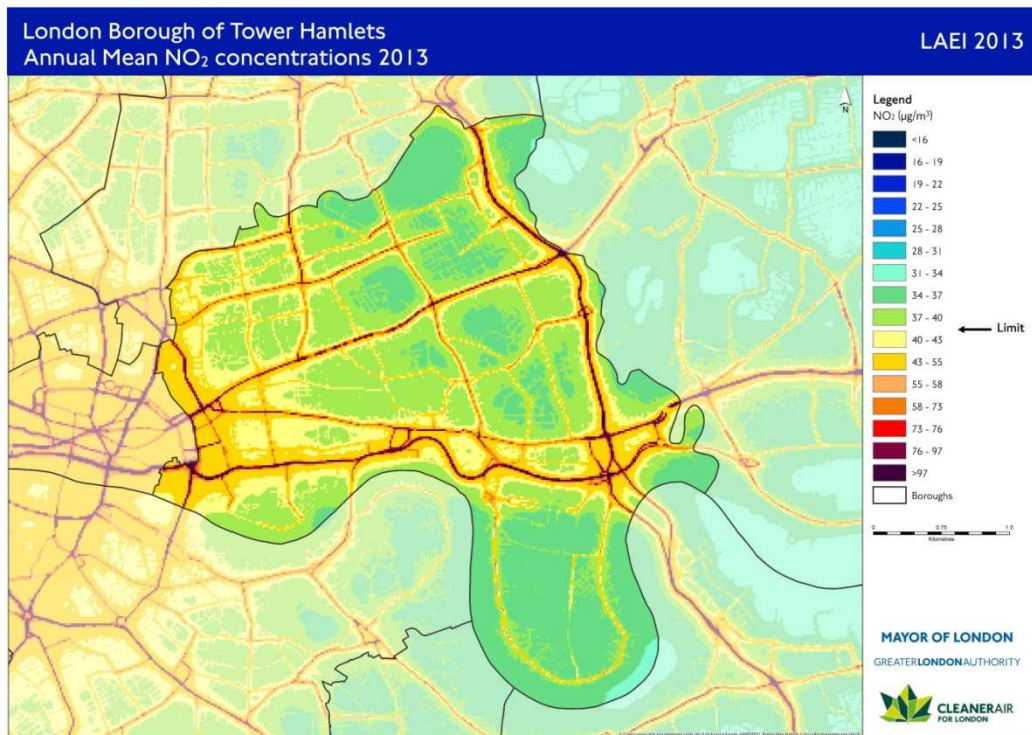


Figure 1 shows the variation in annual concentrations of Nitrogen Dioxide across the Borough. The map shows that the concentrations are highest west of the borough closest to the City, with a large area exceeding the NO<sub>2</sub> annual objective, and along and around the main roads across the rest of the borough, with areas such as Limehouse and Poplar exceeding the annual objective. The lowest concentrations are in the south of the borough on the Isle of Dogs.



**Figure 2** Modelled map of annual mean PM<sub>10</sub> (from the LAEI 2013)

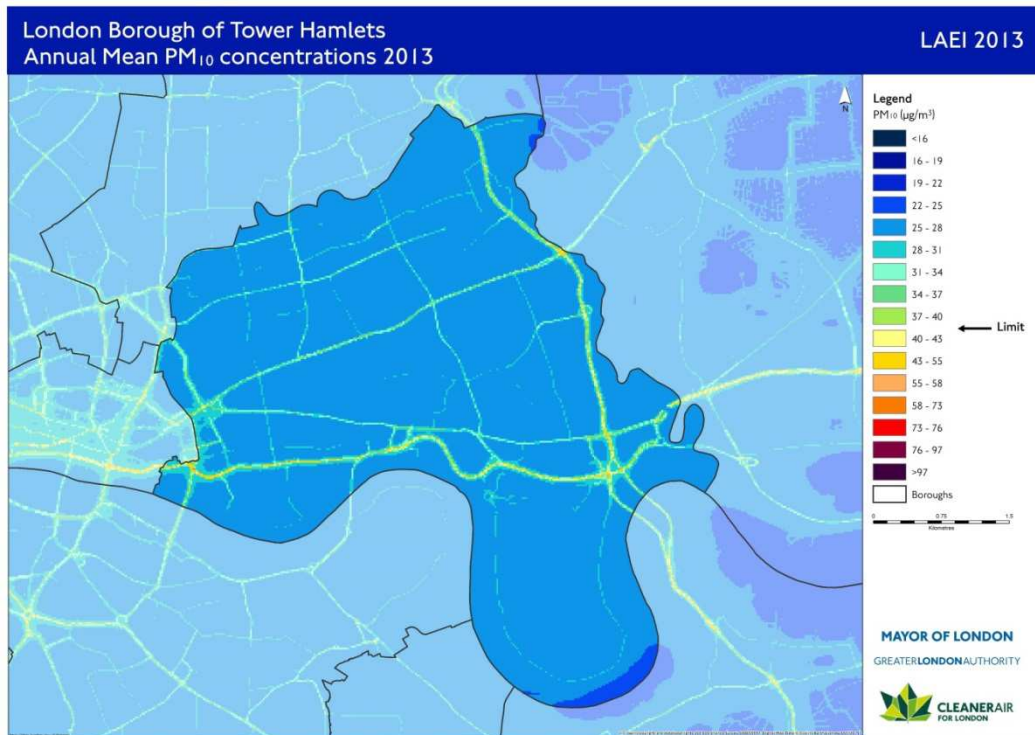


Figure 2 shows the variation in annual average concentrations of PM<sub>10</sub> across the borough. The majority of the borough has a concentration lower than the annual objective, with the highest concentrations and exceedances being along the main roads through the borough.

**Figure 3** Modelled map of annual mean PM<sub>2.5</sub> (from the LAEI 2013)

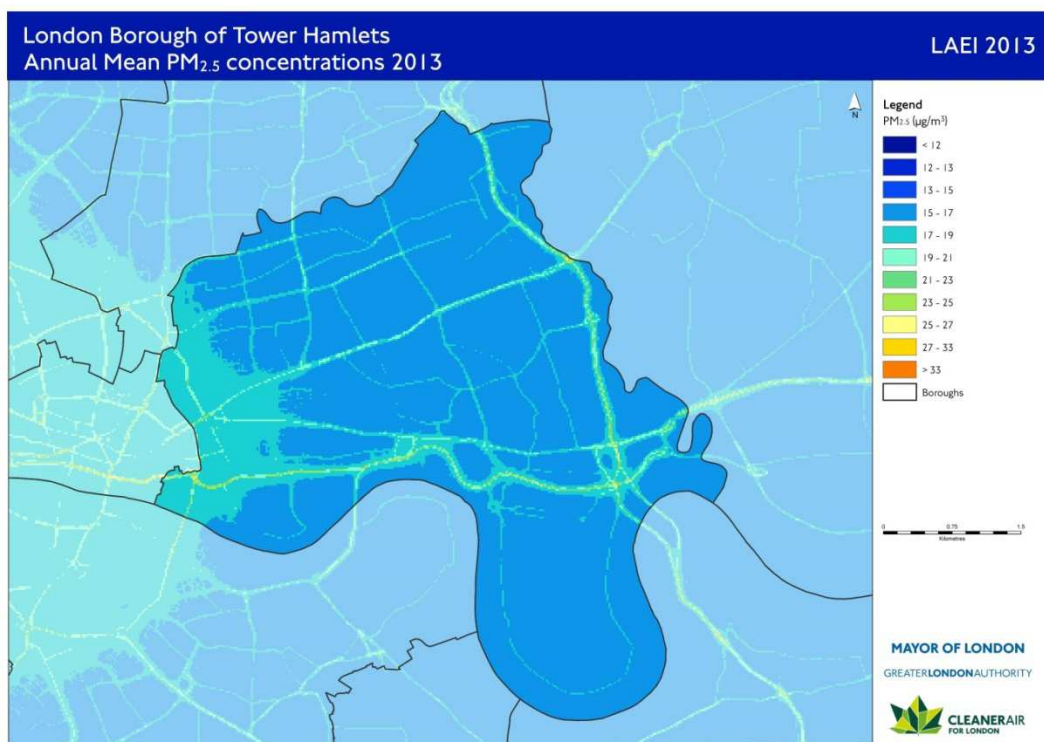


Figure 3 shows the variation in annual average concentrations of PM<sub>2.5</sub> across the borough. The highest concentrations are shown in the western edge of the borough and along the main roads running through the borough.

### 1.3 AQMAs and Focus areas

#### Air Quality Management Area

In Tower Hamlets an Air Quality Management Area (AQMA) has been declared across the **whole borough**.

The AQMA has been declared for the following pollutants:

- (i) Nitrogen Dioxide - because we are failing to meet the EU annual average limit for this pollutant at some of our monitoring stations and modelling indicates it is being breached at a number of other areas across the borough.
- (ii) Particulate Matter (PM<sub>10</sub>) - because although we are meeting EU Limits we are exceeding World Health Organisation air quality guideline for this pollutant and we have a formal responsibility to work towards reductions of PM<sub>2.5</sub>, which is a fraction of PM<sub>10</sub>. Concentrations of PM<sub>2.5</sub> are measured at specific monitoring points throughout the borough.

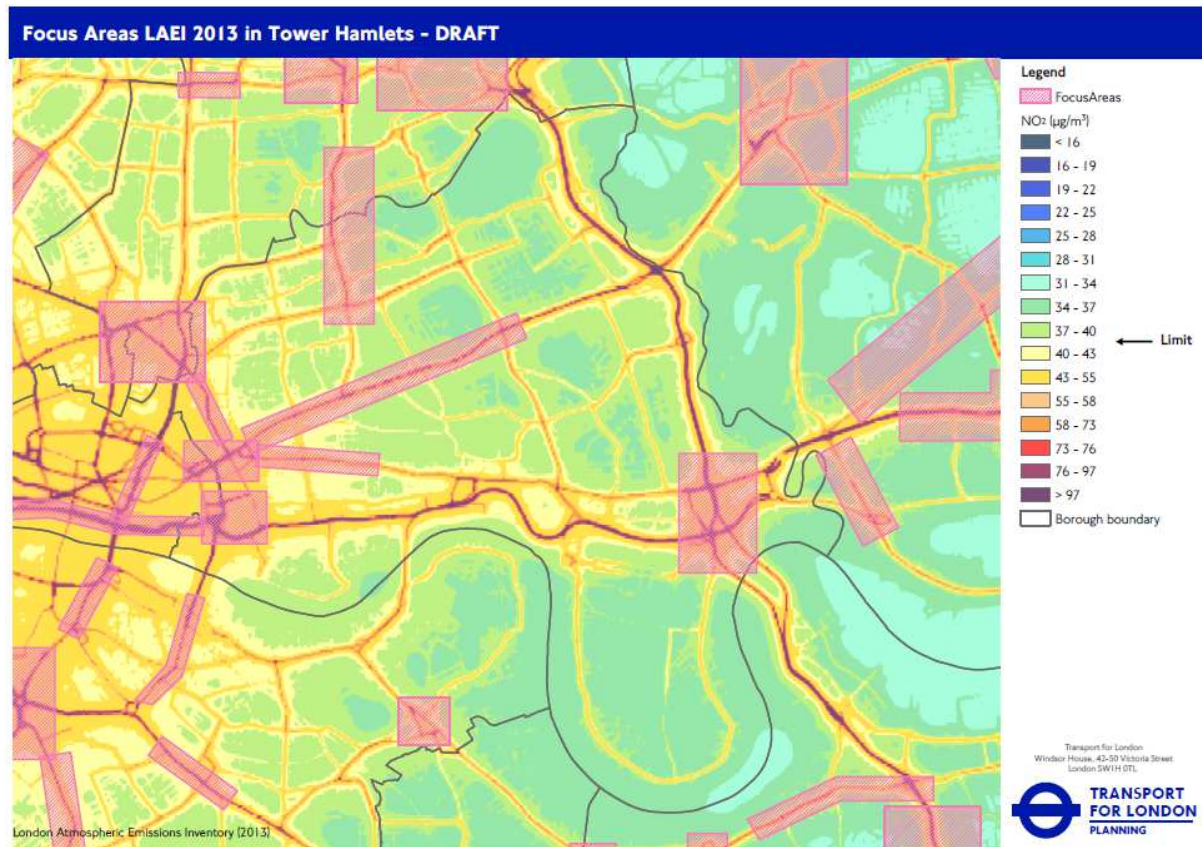
#### Focus Areas

Air Quality Focus Areas are locations that have been identified as having high levels of pollution and human exposure. There are 187 Focus Areas across London, these have been determined by the GLA through analysis of monitoring data, modelled data, exposure data and local characteristics. Focus Areas are used to inform local air quality management, the development of air quality interventions and the planning process. Under London Local Air Quality Management guidelines, boroughs are required to have regard to the focus areas in their borough when devising their air quality action plans.

The 7 focus areas for Nitrogen Dioxide for Tower Hamlets include:

A11 Whitechapel Road to Mile End junction A1205 Burdett Road
Aldgate and Aldgate East
A107 Cambridge Heath Rd/Bethnal Green Rd to Mare St/Well Street
Blackwall A13 East India Dock Road/Aspen Way/Blackwall Tunnel
Commercial Road from Aldgate East to jctn Jubilee Street
Tower Hill/Tower Gateway/Cable St/The Highway
Commercial Street

Figure 4 Map of Air Quality Focus Areas for Nitrogen Dioxide



### 1.4 Sources of Pollution in Tower Hamlets

Pollution in Tower Hamlets comes from a variety of sources. This includes pollution from sources outside of the borough, and, in the case of particulate matter, a significant proportion of this comes from outside of London and even the UK.

Of the pollution that originates in the borough the main sources of NO<sub>2</sub> are transport and domestic emissions from boilers and CHPs and the main sources of particulate matter are traffic emissions, re-suspension of particles from traffic sources e.g brake or tyre wear and emissions from construction machinery (NRMM).

**Figure 5** NOx Emissions by source and vehicle type (from the LAEI 2013)

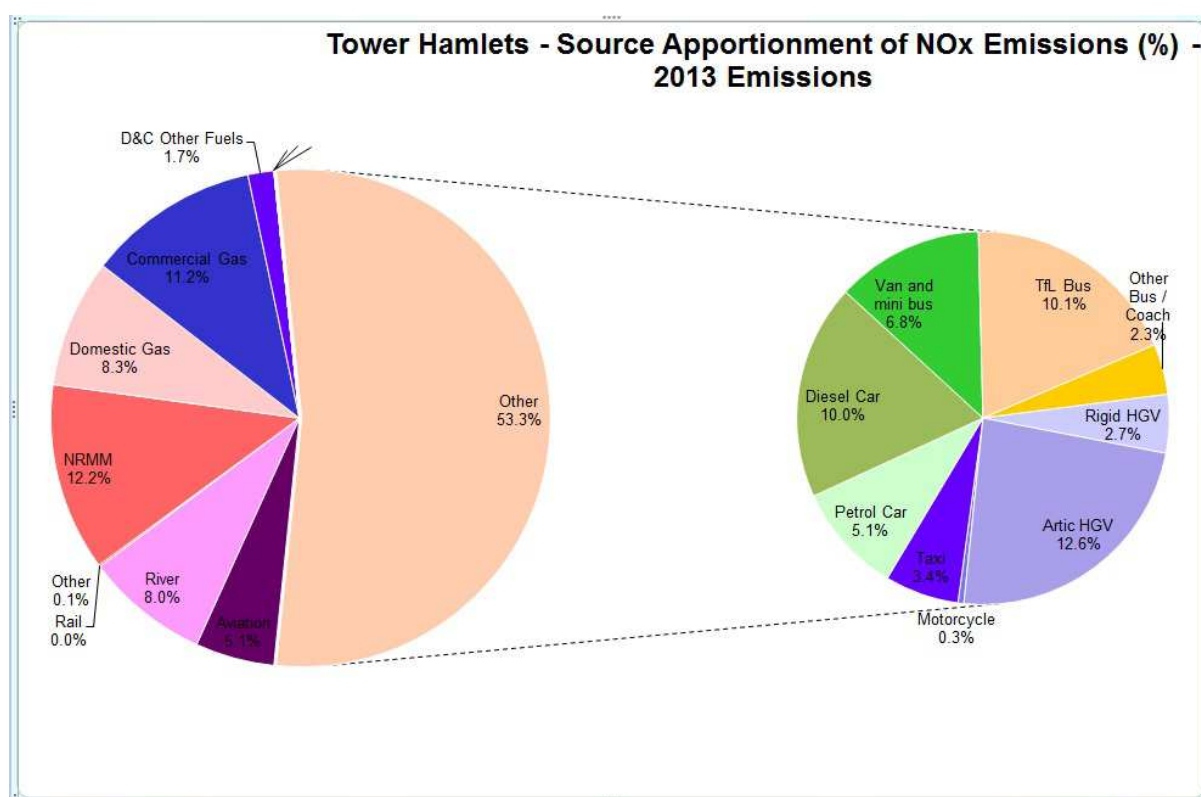


Figure 5 above shows the sources of NOx emissions in the borough. The chart on the left shows that over 50% of the boroughs NOx emissions come from transport sources. This is then broken down into type of transport on the chart on the right. Other significant sources shown in the chart are Non Road Mobile Machinery used in construction and demolition, and domestic and commercial gas used in boilers and CHPs at residential and business properties. On the transport chart it is clear that diesel cars contribute more than petrol cars and HGV's and busses are also a significant source of NOx emissions in the Borough.

Figure 6 PM<sub>10</sub> Emissions by source and vehicle type (from the LAEI 2013)

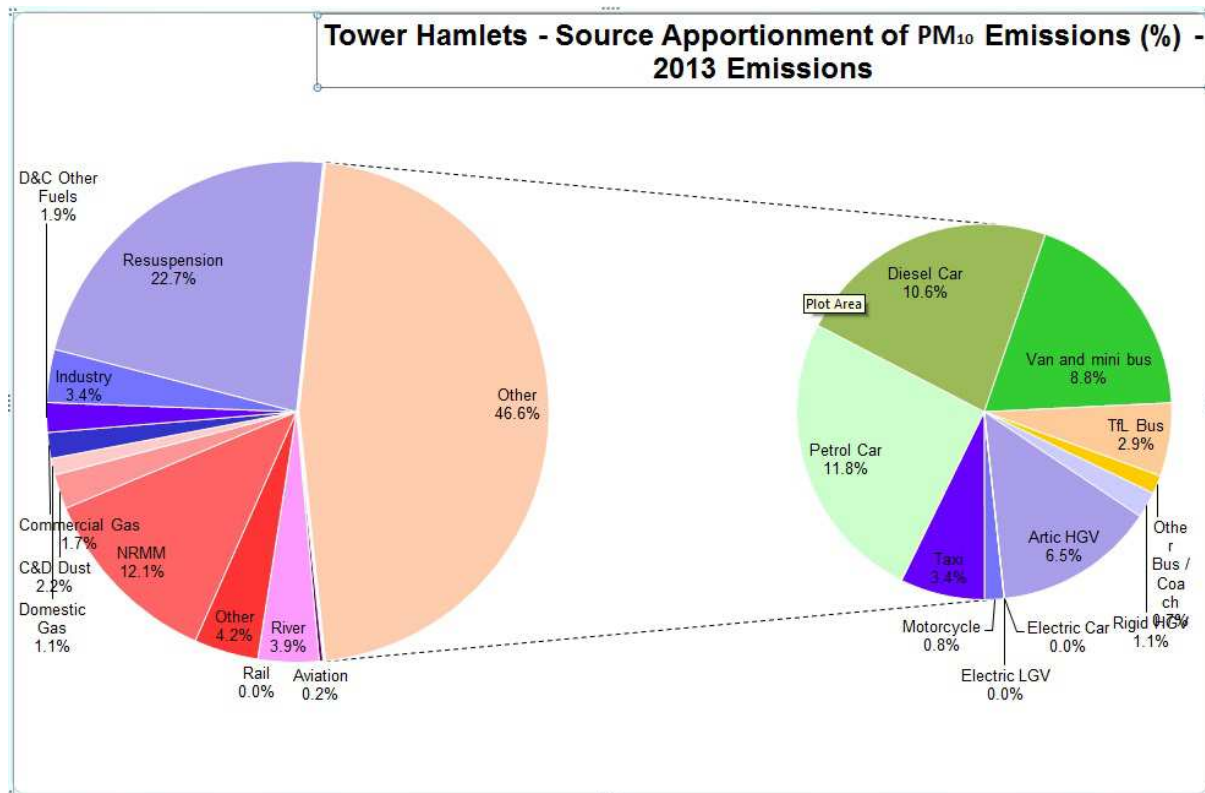


Figure 6 above shows the sources on PM<sub>10</sub> emissions in the Borough. The chart on the left shows that the major emissions source in transport and this is further broken down by transport type in the chart on the right. Diesel and petrol cars account for a similar proportion of the PM<sub>10</sub>. One notable difference from the NO<sub>x</sub> sources is the effect of particle resuspension which accounts for 23% of PM<sub>10</sub>. Commercial and domestic gas are much less significant for emissions of PM<sub>10</sub> in comparison to NO<sub>x</sub> emissions as gas does not produce much particulate matter.

**Figure 7** PM<sub>2.5</sub> Emissions by source and vehicle type (from the LAEI 2013)

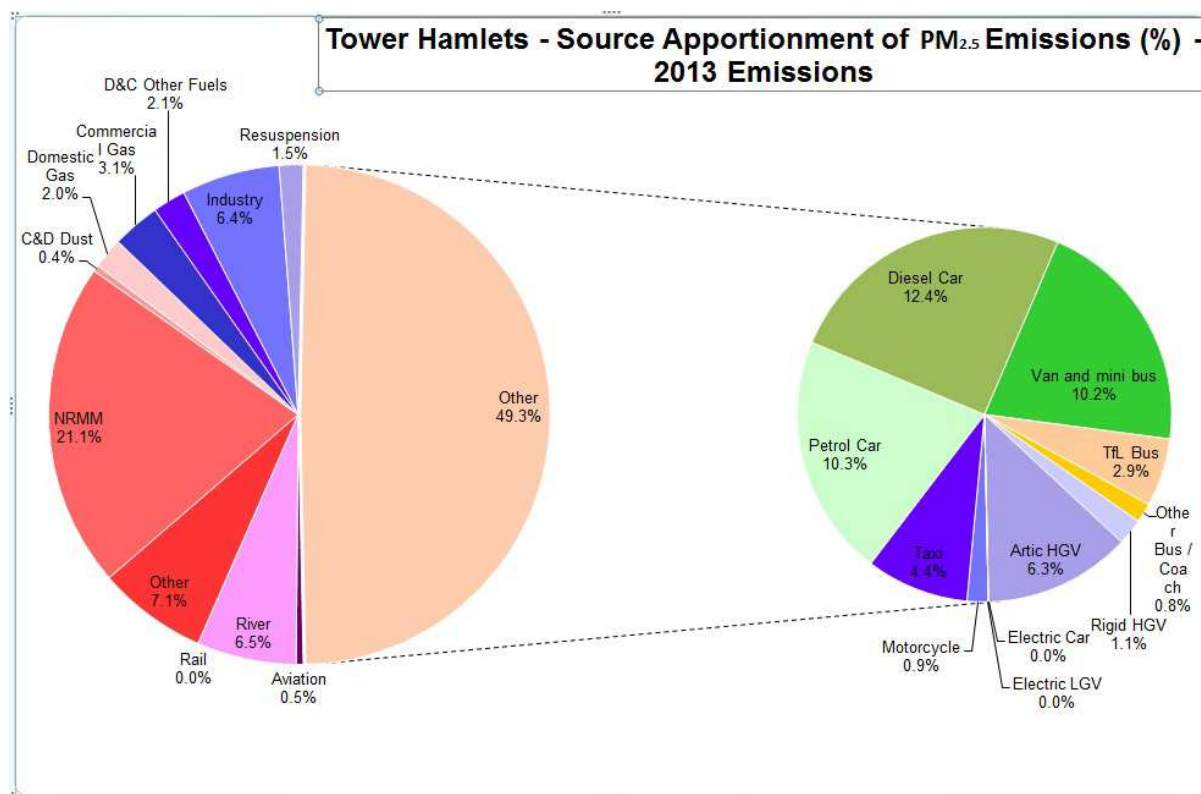


Figure 7 shows the sources of PM<sub>2.5</sub> emissions in the borough. The chart on the left shows that just under 50% of the emissions come from transport with this source being further broken down on the chart on the right. Non Road Mobile Machinery is also a significant source of PM<sub>2.5</sub>. In contrast to PM<sub>10</sub>, resuspension only accounts for a very small proportion of the PM<sub>2.5</sub> emissions.

## **2 Tower Hamlets’ Air Quality Priorities**

We are determined to tackle poor air quality in Tower Hamlets and raising awareness and providing education about the causes and impacts of poor air quality is crucial to achieving this. We want to support residents to make a difference to the air quality that is affecting all of us.

Due to Tower Hamlet’s strategic location in London, the majority of pollution in our jurisdiction is from traffic travelling through the borough. Tower Hamlets connects East and West London via the A11 and North and South London via the A12.

Car ownership is relatively low in Tower Hamlets compared to other London boroughs, with 42,514 vehicles registered in the borough in 2015<sup>6</sup>. This is the 4<sup>th</sup> lowest figure for a borough in London. Therefore a key part of this action plan will aim to work in partnership with the Greater London Authority and Transport for London, as well as lobby other regional and national authorities to improve air quality in Tower Hamlets.

Tower Hamlets is experiencing unprecedented development and population increase, in 2015 the borough experienced a 38.3% population increase – the highest population increase of all Local

<sup>6</sup> GLA London Data Store: <https://data.london.gov.uk/dataset/licensed-vehicles-type-0>

Authorities in England and Wales<sup>7</sup>. Therefore a key priority is ensuring new development does not hinder our progress on improving air quality.

However Tower Hamlets is striving to go beyond compliance with our commitment and responsibility to reduce emissions from our own operations and jurisdiction. We are therefore committing to a range of projects and localised measures to improve air quality and work towards reducing exposure to air pollution.

The key priority work areas for Tower Hamlets include:

- Raising awareness of the pollution issue and encouraging residents to reduce their impact
- Implementing a network of publicly available electric vehicle charge points
- Increasing provisions for walking and cycling to encourage a shift from car usage to sustainable transport modes
- Instigating measures at schools to reduce emissions and exposure
- Ensure air quality policies are strengthened in the new Local Plan to minimise impacts from the high levels of development in the borough
- To lead by example by upgrading the council fleet to include more Ultra Low Emission Vehicles and ensure the new Civic Centre is as sustainable as possible and has no adverse impact on the local air quality.
- Lobbying government for stronger national action on air quality and partnership working with the GLA, TFL and other stakeholders to ensure a joined up approach
- Investing and encouraging new technologies and planting systems which can tackle air quality

### **3 Development and Implementation of Tower Hamlets' AQAP**

#### **3.1 Consultation and Stakeholder Engagement**

In developing/updating the action plan we have worked with other council departments, agencies, businesses and the local community to improve local air quality. Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in Table 3.1.

The full report on our consultation and stakeholder engagement is given in Appendix A.

**Table 3.1 Consultation Undertaken**

<b>Yes/No</b>	<b>Consultee</b>
YES	the Secretary of State
YES	the Environment Agency
YES	Transport for London and the Mayor of London (who will provide a joint response)
YES	all neighbouring local authorities
YES	other public authorities as appropriate

<sup>7</sup> Tower Hamlets Population Estimates 2015:

[http://www.towerhamlets.gov.uk/Documents/Borough\\_statistics/Population/MYE\\_2015\\_CRU\\_Briefing.pdf](http://www.towerhamlets.gov.uk/Documents/Borough_statistics/Population/MYE_2015_CRU_Briefing.pdf)

## **4 AQAP Progress**

Table 4.1 shows the Tower Hamlets AQAP. It contains:

- a list of the actions that form part of the plan;
- the responsible individual and departments/organisations who will deliver this action;
- expected benefit in terms of emissions and concentration reduction;
- the timescale for implementation; and
- how progress will be monitored.

**Governance and Monitoring of the Air Quality Action Plan**The overall responsibility for the implementation of the plan sits with Environmental Health; however the actions within the plan will be implemented and monitored by the relevant council departments.

We will create an Air Quality Partnership Board to ensure delivery of the Plan. Quarterly meetings will be held by the Pollution Team Leader with the relevant Members/Service Heads/lead officers responsible for delivering the actions contained within the plan. The meetings will serve as an opportunity to feedback on progress with actions contained within the action plan and to highlight any new areas of work across the council that could have an impact on air quality or for any new opportunities that may arise for tackling air pollution.

The meetings will be scheduled for March, June, September and December each year so as feedback on action progress can be compiled in March and included in the Annual Status Report to be submitted to the GLA each April.

### **Resourcing & Budgets**

The actions in the Air Quality Action Plan will be resourced through utilising existing staff members in the relevant departments.

Projects requiring a budget will be financed through existing team budgets, the new Mayor of Tower Hamlets air quality fund, the Carbon Offset fund (where actions have impacts on both local air pollutants and carbon), bespoke growth bids and external funding bids where possible, e.g Mayor of London's Air Quality Fund and Defra Air Quality Funds.



**Table 4.1 Air Quality Action Plan**

The actions have been grouped into six categories: Public health and awareness raising; London Local Air Quality Management (LLAQM); Developments and buildings; Major infrastructure projects; Delivery servicing and freight; Borough fleet actions; Localised solutions; Cleaner transport and Lobbying & partnership.

Action category	Action ID	Action description	Department/ Team	Expected emissions/ concentrations benefit	Timescale for implementation	Target/ monitoring	Further information
Public Health and awareness raising	1	Develop and implement a communications strategy for disseminating air quality information in the borough to raise awareness of the impacts of poor air quality and encourage behaviour change	Pollution/Communications	Indirect impact on emissions through awareness raising	March 2018	Measure – audience reached with air quality messages	
Public health and awareness raising	2	Director of Public Health to have responsibility for ensuring their Joint Strategic Needs Assessment (JSNA) has up to date information on air quality impacts on the population – Air Quality officer to be consulted on JSNA.	Public Health	Emissions reductions are indirect and unquantifiable, but enhanced co-ordination will benefit all air quality initiatives.	Ongoing	Measure – adequate consideration given to air quality in each update of the JSNA	Already included in the most recent JSNA, must ensure that up to date info is included in future assessments.
Public health and	3	Strengthening co-ordination with Public Health by ensuring that at least one public health specialist	Public Health	Emissions & concentrations	Ongoing	Measure – at least one specialist to	

awareness raising		within the borough has air quality responsibilities outlined in their job profile.		reductions indirect and unquantifiable , but enhanced co-ordination will benefit all air quality initiatives.		have AQ in their objectives	
Public health and awareness raising	4	Director of Public Health to sign off all new Air Quality Action Plans.	Public Health	Emissions & concentrations reductions indirect and unquantifiable but enhanced co-ordination will benefit all air quality initiatives.	On production of each revised action plan every 5 years	Measure – all action plans to be signed	
Public Health and awareness raising	5	Support patients with heart and lung conditions by providing air quality advice to discharged patients, particularly vulnerable & those with heart/lung conditions. This would be a continuation of the ‘Protecting Patient’ work stream from the Barts Project.	Pollution/ Public Health	Protect individual health	Tbc dependent upon funding identification	KPI- no of patients engaged with on air quality messages, no of maps given out.	See Global Action Plan website for further info on the previously run project <a href="https://www.globalactionplan.org.uk/cleaner-air-with-barts-health">https://www.globalactionplan.org.uk/cleaner-air-with-barts-health</a>
Public health and awareness	6	Support and Promotion of air quality awareness programmes such as AirTEXT.	Pollution Team	Protect individual health	Ongoing	KPI – AirText - no of residents signed up to service	

raising							
Public health and awareness raising	7	Encourage schools to join the TfL Sustainable Travel Active Responsible Safer (STARS) accredited travel planning programme by providing information on the benefits to schools and supporting the implementation of such a programme.	Development Team /School travel Officer	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	KPI - % of schools signed up. Target 70% by 2021. Secondary KPI - % of trips made by car for schools that are part of the scheme.	2016 – 40 schools signed up so far.
Public health and awareness raising	8	Air quality at schools – Roll out the cleaner air for schools program that was previously run in 2 schools, to more schools in high pollution areas.	Pollution Team	NO <sub>2</sub> , PM & CO <sub>2</sub> & awareness raising	2 schools per year funding dependant	Target - project run at 2 schools per year	See : <a href="http://www.looplabs.org/case-studies/">http://www.looplabs.org/case-studies/</a> for case study of previous project
Public Health and awareness raising	9	Pollution Audits in schools. Support the GLA in their program to provide air quality audits in 2 schools.	Pollution Team	Audit will generate a plan to reduce pollution levels.	Audits to be completed by spring 2018	Target - 2 school audits carried out and measures implemented	
Public Health and awareness raising	10	Schools anti-idling project, engagement with schools and installation of anti-idling signage at school parking areas in high pollution areas.	Pollution Team	NO <sub>2</sub> , PM & CO <sub>2</sub>	All signs to be procured and installed by July year 2018	% of schools with signs installed, target 100%	
Public Health and awareness raising	11	Schools Environmental Theatre Project	Pollution Team	Awareness raising.	Aim to run at 10 schools per year	KPI – number of schools/pupils engaged	

Public Health & awareness raising	12	Investigate and invest in new technology as it becomes available to reduce pollution levels at pollution hotspots & sensitive uses e.g.schools	Pollution Team	NO2 & PM	Ongoing	Progress will be monitored by the Pollution team leader	
Public Health and awareness raising	13	Citizen Science air quality monitoring project	Pollution Team	Awareness raising.	6 month project to be completed by July 2018	Target – engage 30 people in a six month project	
Public Health and awareness raising	14	Work with Residential Providers to develop and implement a strategy for disseminating air quality information to their tenants.	Pollution Team/Communications	Protect individual health	Dec 2018	Measure audience reached with air quality messages	
Public Health and awareness raising	15	Use Health and Wellbeing Board to get existing and future public sector and RP partners to pledge to increase the number of, electric, hybrid, and cleaner vehicles in their fleets.	Public Health	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	No of pledges/updates	Link to action 45 - Eco Stars Scheme encourage fleets to sign up
LLAQM	16	Continue to run the 3 continuous monitoring stations, monitoring pollutants of concern to ensure air quality objectives are being met and to assess the effectiveness of local and regional policies. Investigate and implement further monitoring where necessary, including a new PM <sub>2.5</sub> analyser at Mile End.	Pollution Team	Data collection only.	Ongoing	Pollution monitoring is reported on in the Annual Status Report.	Monitoring data is the evidence base for our AQMA declaration and for measuring the effectiveness of projects.  Installation of new monitoring equipment is funding dependent.

LLAQM	17	Continue to implement the NOx Diffusion Tube Monitoring network across the borough. Investigate and implement further monitoring where necessary. E.g at schools.	Pollution Team	Data collection only.	Ongoing	Pollution monitoring is reported on in the Annual Status Report.	Supports Cleaner Air Borough Status
LLAQM	18	Continue to ensure that all pollution monitoring data is available to the public and the website is regularly updated with the latest available data	Pollution Team	Information sharing and awareness raising.	Ongoing	Target – 100% monitoring data available online	New data management contract, data is available on <a href="http://www.airquality England.co.uk">www.airquality England.co.uk</a>  The NOx tube results are available on the Tower Hamlets Website.
LLAQM	19	Fulfil the GLA’s criteria to retain our Cleaner Air Borough Status each year	Pollution Team	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing and reported annually in the ASR	Target – Cleaner Air Borough Status to be achieved each reporting year.	The criteria are under 6 themes: political leadership; taking action; leading by example; informing the public; using the planning system & integrating air quality into the public health system.
Development and buildings	20	Ensuring emissions from demolition and construction are minimised via planning applications reviews and conditions attached to planning permissions requiring Construction Environmental Management Plans, including dust mitigation and monitoring and Travel Plans encouraging sustainable travel for site workers	Pollution Team/Development Management	NO <sub>2</sub> & PM	Ongoing	Reported on in annual ASR. KPI % of major planning applications, target – 100%	Air Quality Officer to be consulted on planning consultations to ensure the GLA’s Control of Dust & Emissions during construction and demolition 2014SPG (or subsequent updated guidance) is applied to all major planning applications.  This policy is being strengthened in the current update of the Local Plan

Development and buildings	21	Ensuring all major developments adhere to the GLA's Non Road Mobile Machinery Low Emission Zone. I.e. All NRMM used on site must meet the emissions standards stated in the GLA's Control of Dust and Emissions during Demolition and Construction SPG 2014 (or subsequent updated guidance)	Development Management/Pollution Team	NO <sub>2</sub> & PM	Ongoing.	The number of developments with the condition attached is to be reported annually in the annual status report. Monitoring will also be carried out by officers checking the NRMM website and conducting site visits.,	Development Management teams are including this requirement in the planning conditions for all major developments.  This is being included as a new policy in the updated Local Plan.
Development and buildings	22	Ensuring Combined Heat and Power (CHP) and biomass air quality policies are met at all developments proposing to utilise CHP, including the NOx emission limits for heating plant as stated in the GLA's Sustainable Design and Construction SPG (or subsequent updated guidance)	Pollution/Sustainability	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	Reported on in Annual Status Report. KPI % of major planning applications, target – 100%	Air Quality Officer to review air quality assessments/energy strategies to ensure compliance. A no biomass policy is already in place for the whole borough.  This policy is being included in the updated Local Plan.
Development and buildings	23	Ensuring new developments have suitable energy efficiency measures installed to reduce the demand for onsite heat generation from boilers & CHP's.	Sustainability	NO <sub>2</sub> & CO <sub>2</sub>	Ongoing	Measure – All major planning applications to be reviewed to ensure sustainability policies are met	This is to be incorporated into the new Local Plan. The sustainable development team review the Energy Strategies for planning applications to ensure sustainability policies are adhered to.
Development and buildings	24	Ensuring Air Quality Neutral policies are complied with at all	Pollution Team	NO <sub>2</sub> & PM	Ongoing	Reported on in the annual ASR.	Air Quality Officer to review air quality assessments to

		developments and exceeded where possible. Ensure all larger developments (as defined by the GLA) will be air quality positive.				KPI – % of major planning applications, target – 100%	<p>ensure compliance of new developments with the emission benchmarks as set out in the GLA’s Sustainable Design and Construction SPG (or any subsequent updated guidance).</p> <p>This policy is being included in the new updated Local Plan.</p> <p>The GLA’s new draft Environment Strategy includes a policy for larger developments to be air quality positive and shall provide further guidance on this when the final strategy is published.</p>
<b>Development and buildings</b>	25	Reduce the use of private cars by residents by encouraging car free developments and limiting number of parking spaces in new developments	Development Management	NO <sub>2</sub> & PM	Ongoing	Measure – All major planning applications reviewed to ensure they meet the parking standards.	Parking standards for new developments are to be included in the new Local Plan.
<b>Development and buildings</b>	26	Ensure the layout of new developments considers air quality impacts, for example considering the locations of buildings with different proposed uses and locating the most sensitive use units in the least polluted areas.	Pollution team/ Development Management	Exposure reduction	Ongoing	Measure – All major planning applications reviewed to ensure this policy has been considered	Planning applications will be reviewed to ensure consideration of this.
<b>Development</b>	27	Ensuring adequate, appropriate,	Development	Exposure	Ongoing	Implementation	Currently being incorporated

and buildings		and well located green space and infrastructure, including for walking and cycling, is included in new developments with the Green Grid Strategy promoted and adhered to in all major planning applications and master planning to provide low emissions routes for walking and cycling.	Management	reduction		will be monitored through the rollout of the green grid strategy & the planning database.	into the new Local Plan.  The Green Grid Strategy is currently being updated.
Development and buildings	28	Encourage new developments to install alternative mass waste collection systems, such as ENVAC, to reduce collection vehicle emissions.	Waste Strategy/ Development Management	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	Monitored by the Waste Strategy/ Development team	Currently being incorporated into the new Local Plan.
Development and buildings	29	Ensuring that the whole borough Smoke Control Zones is fully publicised and enforced.	Pollution Team	PM & CO <sub>2</sub>	Ongoing, Communications campaigns to be run annually in autumn/ winter	Monitor by ensuring all reports of the SCZ being breached are investigated  Target 100%.of reports	
Development and buildings	30	Implement a Domestic boiler refit project using the GLA's RE:FIT energy efficiency retrofit programme.	Sustainability Team	NO <sub>2</sub> & CO <sub>2</sub>	Ongoing	Measure – number of boiler replacements. This will be monitored by the Sustainability Team.	This project is being carried out in partnership with Groundwork London
Development	31	Implement a Schools Carbon	Sustainability	NO <sub>2</sub> & CO <sub>2</sub>	5 boiler	Measure –	This project will utilise Carbon



and buildings		Emission Reduction Programme, providing funding towards boiler replacements and insulation schemes in schools.	Team		replacements and 4 insulation projects by end of 2017 and then ongoing project yet to be planned.	number of boilers and efficiency measures funded.  Projects will be monitored by the Sustainability Team.	Offset funding to reduce both CO <sub>2</sub> and NO <sub>2</sub> from building emissions
Development and buildings	32	Implement a Carbon Emissions Reduction Programme for council properties including boiler replacements and insulation projects.		NO <sub>2</sub> & CO <sub>2</sub>	2018 onwards	Measure – number of boilers and efficiency measures implemented. To be monitored by the Sustainability Team	This project will utilise Carbon Offset funding to reduce both CO <sub>2</sub> and NO <sub>2</sub> from building emissions
Development and buildings	33	Enderby Wharf – Ensure a thorough and robust evaluation of the Environmental statement, that methodologies used comply with current guidance and that the project will not lead to any significant adverse air quality impacts in the borough.	Pollution Team/Development Management	NO <sub>2</sub> & PM	Ongoing	Measure – all consultations responded to with air quality interrogated appropriately	It is noted that LBTH are not the determining authority on this application and instead only a consultee
Development and buildings	34	Ensure applications for new developments in neighbouring boroughs that have the potential to have impacts in Tower Hamlets are	Pollution Team/Development Management	NO <sub>2</sub> & PM	Ongoing & September 2017 for inclusion of	Measure – All consultations received from neighbouring	The Air Quality Officer will review the Air Quality Assessments for applications that we are designated as a

		reviewed for air quality impacts and that no development will lead to any significant adverse air quality impacts in the borough.			new parking policies in the new Local Plan	boroughs assessed for air quality impacts	consultee
Development and buildings	35	Lead by example by ensuring the councils new Civic Centre is a best practice example of a sustainable and low emissions development in regards to air pollution and CO <sub>2</sub> with both air quality neutral and carbon zero policies being met.	Corporate Property and Capital Delivery/Development Management/Sustainability/Pollution Team	NO <sub>2</sub> & CO <sub>2</sub>	Building due for completion in 2021, planning process 2017-2018.	Measure – development to be delivered to meet or exceed all sustainability and air quality standards Including BREEAM	Corporate Property and Capital Delivery team are leading on the planning application; the relevant teams will be consulted to ensure sustainability/air quality targets are met.
Development and buildings	36	Improve the energy efficiency of John Onslow House as part of the upcoming refurbishment with the aim of becoming carbon zero and any new boilers to be ultra-low NO <sub>x</sub>	Facilities/Sustainability	NO <sub>2</sub> & CO <sub>2</sub>	Due for completion by 2021	Measure – development to be delivered to exceed all sustainability and air quality standards. Monitoring of this will be done throughout the planning & implementation process.	
Development and buildings	37	Ensure developments that will increase river traffic, in the operational phase of development, are thoroughly assessed for potential air quality impacts and	Pollution Team	NO <sub>2</sub> & PM	Ongoing	Measure – all relevant development assessed for air quality impacts	

		will not have a significant negative impact on air quality.					
Major Infrastructure Projects	38	Ensure the Tideway Tunnel infrastructure project is sustainably delivered with the Construction Code of Practice adhered to and effective emissions mitigation in place during construction & operational phases.	Pollution Team/ Planning	NO <sub>2</sub> & PM	Project due for completion in 2021.	Monitoring to be done by Thames Tideway with reports provided to LBTH periodically	
Major Infrastructure Projects	39	Silvertown Tunnel – Ensure a thorough and robust evaluation of the Environmental statement, that methodologies used comply with current guidance and that the project, during both the construction and operational phases, will not lead to any significant adverse air quality impacts in the borough and that adequate mitigation is provided for any potential impacts. Ensure traffic modelling on which the air quality statements are robust.	Pollution Team/Strategic Transport	NO <sub>2</sub> & PM	Public examination closing 11 <sup>th</sup> April 2017.  Decision expected in 2017.	Measure – all consultation stages thoroughly reviewed for potential air quality impacts and robustness of traffic data on which the air quality assessments are based	LBTH has attended the Environmental Issue Specific Hearing and raised concerns regarding the mitigation trigger levels
Major Infrastructure Project	40	Ensure that all future major infrastructure projects are adequately reviewed and assessed through the planning process to ensure impacts on air quality are minimised.	Pollution/Development Management	NO <sub>2</sub> & PM	Ongoing	Target - 100% infrastructure projects reviewed and assessed.	Guidance on this is to be included in the new Local Plan
Delivery servicing and freight	41	Continue to ensure that Procurement policies to include a requirement for suppliers with large fleets to have attained, silver	Procurement team	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	Measure – actions implemented in policies	

		as a minimum or gold as a preference, Fleet Operator Recognition Scheme (FORS) accreditation or equivalent.					
Delivery servicing and freight	42	Investigate updating Procurement policies to ensure sustainable logistical measures are implemented (and include requirements for preferentially scoring bidders based on their sustainability criteria).	Procurement Team	NO <sub>2</sub> , PM & CO <sub>2</sub>  Reduction in pollutants associated with more sustainable logistics.	Policies updated by 2019	Measure – actions implemented in policies	
Delivery servicing and freight	43	Investigate re-organisation of freight to support consolidation (or micro-consolidation) of deliveries, by setting up or participating in new logistics facilities, and/or requiring that council suppliers participate in these.	Development Management/ Engineering Team	NO <sub>2</sub> , PM & CO <sub>2</sub>	March 2019	Implementation of freight consolidation scheme.	Target area for freight consolidation is the Isle of Dogs, the GLA lead on the South Polpar and Isle of Dogs Opportunity Area Framework which includes priority to deliver freight consolidation centres which is being managed by TFL.
Delivery servicing and freight	44	Investigate implementing a local Eco Stars Fleet Recognition Scheme for Tower Hamlets to	Pollution Team	NO <sub>2</sub> , PM & CO <sub>2</sub>	March 2019	Measure – no of scheme members	<a href="http://www.ecostars-uk.com/">http://www.ecostars-uk.com/</a> This action is funding and resource dependent
Borough fleet/council contracted fleet actions	45	Join a recognised appropriate driver award scheme, e.g. Fleet Operator Recognition Scheme (FORS) or Van Excellence & achieve certification.	Development, Compliance and Commissioning Department – Fleet management team.	NO <sub>2</sub> , PM & CO <sub>2</sub>	Achieve certification by Dec 2017	KPI – certification awarded.	<a href="http://www.vanexcellence.co.uk/">http://www.vanexcellence.co.uk/</a>  <a href="https://www.fors-online.org.uk/cms/">https://www.fors-online.org.uk/cms/</a>
Borough fleet/council	46	Increasing the number of, electric, hybrid, and cleaner vehicles in the	Development, Compliance and	NO <sub>2</sub> , PM & CO <sub>2</sub>	Phase 1 by Dec 2017 &	Monitoring of the fleet profile	

<b>contracted fleet actions</b>		boroughs' fleet.	Commissioning Department – Fleet management team.		then ongoing fleet review	& records. KPI – No of ULEV's in borough fleet	
<b>Borough fleet/ Council contracted fleet actions</b>	47	Accelerate uptake of new Euro VI vehicles in borough fleet, ending the purchase of diesel vehicles where feasible.	Development, Compliance and Commissioning Department – Fleet management team.	NO <sub>2</sub> & PM	Total fleet upgrade to meet ULEZ Standards in time for ULEZ implementation	Monitoring of the fleet profile & records. KPI - % of ULEZ compliant vehicles in fleet.	New diesel vehicles should only be purchased when it has been demonstrated that it is not possible/financially viable to purchase an equivalent vehicle with a lower emission fuel.
<b>Borough fleet/council contracted fleet actions</b>	48	Real-time Telematics monitoring of fleet driver behaviour and subsequent driver training.	Development, Compliance and Commissioning Department – Fleet management team.	NO <sub>2</sub> , PM & CO <sub>2</sub>	Phase 1 – Jan 2017, first 75 vehicles; Phase 2 – Jan 18, next 75 vehicles; Phase 3 – 2019, all others.	Number/ % of vehicles fitted with telekinetic monitoring. Number/% of drivers received training	
<b>Borough fleet/council contracted fleet actions</b>	49	Utilise round optimisation for council fleet to reduce vehicle miles.	Compliance and Commissioning Department – Fleet management Team.	NO <sub>2</sub> , PM & CO <sub>2</sub>	March 2019	Fleet manager to monitor progress	
<b>Borough fleet/council contracted fleet actions</b>	50	Procure a cargobike for regular delivery of literature to councillors.	Travel Plan Engineering Team	NO <sub>2</sub> , PM & CO <sub>2</sub>	To be purchased and in use by December	Monitoring will be carried out on how often the bike is used instead of a car.	

					2017	KPI - % of deliveries made by the bike. 100% target.	
<b>Borough fleet /council contracted fleet actions</b>	51	Project 2020: use the procurement process to ensure all waste & Recycling collection vehicles in the new contract are as low emission as possible by prioritising tenders with the highest proportion of low emission vehicles.	Waste Strategy	NO <sub>2</sub> , PM & CO <sub>2</sub>	New collection contract commences in 2020	This will be monitored through the contract management.	
<b>Borough fleet/council contracted fleet actions</b>	52	Project 2020: utilise round optimisation to reduce vehicle mileage for waste collections.	Waste Strategy	NO <sub>2</sub> , PM & CO <sub>2</sub>	New collection contract commences 2020	Target - All rounds reviewed and amended where necessary.	
<b>Borough fleet/council contracted fleet actions</b>	53	Reduce 'Grey Fleet' impacts by reviewing staff parking permits to reduce number or allocate shared team permits rather than individual	Parking/fleet management team	NO <sub>2</sub> , PM & CO <sub>2</sub>	March 2019	Measure – % or staff permit reduction	
<b>Localised solutions</b>	54	Investigate installing Green Infrastructure, such as green walls, green screens or living roofs at schools/residential developments in polluted areas. Linking in with the Green Grid and Open Spaces Strategy.	Pollution Team	Project still to be scoped	Project still needs to be scoped	Project still needs to be scoped	Project funding dependent
<b>Localised solutions</b>	55	Low Emission Neighbourhoods (LENs) – implement the City Fringe LEN in partnership with Hackney and Islington.	Pollution Team / Engineering	NO <sub>2</sub> , PM & CO <sub>2</sub>	Project completed by end of year 2020.	Monitoring of the project will be carried out by the project board.	

Localised solutions	56	Engagement with businesses – Continuation of the ZEN Project engaging businesses with advice and grants to enable them to reduce their air quality impact.	ZEN Project Officers	NO <sub>2</sub> , PM & CO <sub>2</sub> . Awareness raising.	Zen phase 2 April 16 – March 19	ZEN officer to monitor. KPI – no of businesses engaged with & no of pollution reducing measures implemented.	<a href="http://www.zeroemissionsnetwork.com">www.zeroemissionsnetwork.com</a>
Cleaner transport	57	Discouraging unnecessary idling by taxis, coaches and other vehicles. Anti – Idling engagement project focusing on air pollution hotspots and high risk locations such as hospitals and schools.	Pollution Team	NO <sub>2</sub> , PM & CO <sub>2</sub> . Awareness raising	3 year project August 16- August 19	Monitoring the number of people engaged & social media reach.  Target to run 6 idling action days per year.	
Cleaner Transport	58	Enforce anti-idling regulations by becoming a designated authority to issue Fixed Penalty Notices to idling drivers.	Pollution Team/ Enforcement Officers	NO <sub>2</sub> , PM & CO <sub>2</sub> .  Awareness raising also	Spring 2018 to become designated authority and instigate project then ongoing.	Measure – number of FPN’s issued per year.	Enforcement officers will be trained on this and delegated authority to enable them to issue FPN’s.
Cleaner transport	59	Increasing the proportion of electric, hydrogen and ultra-low emission vehicles in Car Clubs .	Parking Services	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	KPI - % of vehicles provided by car club that are ULEV’s	
Cleaner transport	60	Review parking permit fee banding to encourage lower emission vehicle choice or add an additional	Parking Services	NO <sub>2</sub>	Ongoing	Measure – parking fees reviewed and	Should be preceded by an education & awareness campaign

		diesel surcharge to existing permit fees				amended	
Cleaner transport	61	Installation of residential electric charge points.	Engineering/	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	Measure – no of charge points installed, target 150 by 2025.	Electric Vehicle Charge Point Strategy has targets of minimum of 150 on street charge points by 2025, with an aspirational target of 300 (including rapid chargers)
Cleaner transport	62	Installation of rapid chargers to help enable the take up of electric taxis, cabs and commercial vehicles (in partnership with TfL and/or OLEV)	Engineering/ Pollution	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	Measure – no of rapid chargers installed	Locations needed for installation. Existing and new taxi ranks to be prioritised
Cleaner transport	63	Investigate reprioritisation of road space to smooth traffic flow, reduce congestion, improve bus journey times, cycling and pedestrian experience, and reduce emissions caused by congested traffic.	Engineering	NO <sub>2</sub> & PM	Projects yet to be scoped	Projects yet to be scoped	We will be adopting the Healthy Streets approach to design of all corridor schemes as per the MoL's Healthy Streets Plan
Cleaner transport	64	Continue to provide/ ensure provisions of infrastructure to support walking and cycling including on street residential secure parking lockers, cycle routes, cycle permeability schemes, traffic management area reviews.	Engineering/Planning	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	To be monitored by the engineering team and progress reported in annual summary reports.	This is to be included in the new Local Plan.  The Cycling and Walking Plans are to be updated to account for the new Healthy Streets Guidance.  The Council is committed to provided more cycle lanes and improving existing routes and may be off-road, on quiet back streets or on busier



							roads. This will be informed by the proposals emanating from TfL's Strategic Cycling Analysis including a new route along Cambridge Heath Road.
<b>Cleaner Transport</b>	65	Reduce traffic in the borough through the development of a new Local Implementation Plan in line with the Mayors Transport Strategy.	Engineering	NO <sub>2</sub> , PM & CO <sub>2</sub>	New LIP to be developed by October 2018 and ongoing implementation.	The implementation on the new LIP will be monitored by the Engineering department	A Road Traffic Reduction Plan will be included as part of the new LIP.
<b>Cleaner Transport</b>	66	Continue to encourage staff sustainable travel by providing Dr Bike services and staff subscriptions to the TFL cycle hire scheme for site visits. Annual update of the Staff Travel Plan to ensure it remains relevant and proactive.	Staff Travel Plan, Engineering Team	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	Measure – no of Dr Bike sessions run each year & no of cycle hire trips	
<b>Lobbying and Partnership</b>	67	Push for Tower Hamlets to be included in the ULEZ through partaking in the TFL Consultation process.	Pollution Team/ Place DMT	NO <sub>2</sub> & PM	3 <sup>rd</sup> consultation due in Autumn 2017	Measure – all consultations responded to with a cross department response by the due date	A cross departmental response will be provided considering the impacts of the proposals on residents and businesses in the borough
<b>Lobbying and Partnership</b>	68	Ensure responses to all government and regional consultations focus on reducing or eliminating emissions of Local air pollutants and CO <sub>2</sub> .	Pollution Team/ Sustainability/ Development Management	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	Measure – all consultations to assert councils position on emissions reductions.	
<b>Lobbying and</b>	69	Lobby and work with TFL to reduce	Pollution Team/	NO <sub>2</sub> & PM	Ongoing	Measure – no	

<b>Partnership</b>		emissions from busses in the borough. e.g through green bus corridors.  Work with other statutory Services to reduce emissions – LFB, NHS etc	Engineering			of routes that convert to Low emission/ hybrid technology.	
<b>Lobbying and Partnership</b>	70	Lobby and work with TFL to reduce emissions from TfL controlled roads e.g through reprioritisation of road space.	Pollution Team/ Engineering	NO <sub>2</sub> & PM	Ongoing	Monitored through attendance of meetings and meeting minutes	
<b>Lobbying and Partnership</b>	71	Lobby the GLA to strengthen their Air Quality Neutral Policy and lower the CHP emission limits in current guidance.	Pollution Team	NO <sub>2</sub> & PM	Ongoing	Measure – all consultations responded to with a cross department response by the due date	This can be done through a response to the upcoming consultation on the Mayor of London's new Environment Strategy and/ or new London Plan
<b>Lobbying and Partnership</b>	72	The development of a Mayors Air Quality fund within Tower Hamlets.	Pollution Team	NO <sub>2</sub> & PM	2017/18 budget review.	Spending to be monitored by budget holder.	
<b>Lobbying and Partnership</b>	73	The Mayor of Tower Hamlets to hold a meeting with The Royal Borough of Greenwich and Greater London Authority to discuss reducing the environmental impact of the proposed Enderby Wharf cruise terminal. Lobby for shore-side power to be provided for the ships.	Mayor's Office	NO <sub>2</sub> , PM & CO <sub>2</sub>	By end of year 2017	Monitored by Mayor's office	
<b>Lobbying and Partnership</b>	74	Work with the Canal & Rivers Trust, the GLA and other Boroughs with canals to devise a plan to best	Pollution team	NO <sub>2</sub> , PM & CO <sub>2</sub>	Discussions are ongoing	Monitored via progress meetings	Canal and River Trust have jurisdiction over the canals

		tackle issues with emissions from canal boats. Enforcement action to be taken where necessary.					
<b>Lobbying and Partnership</b>	75	Support the Port London Authority in the development and implementation of their Air Quality Strategy for the River Thames	Pollution team	NO <sub>2</sub> , PM & CO <sub>2</sub>	Strategy due to be published by end of year 2017	Measure – attendance at meetings and consultation feedback completed	See for further info: <a href="https://www.pla.co.uk/Environment/Air-Quality-and-Green-Tariff/Air-Quality">https://www.pla.co.uk/Environment/Air-Quality-and-Green-Tariff/Air-Quality</a>
<b>Lobbying and Partnership</b>	76	Support the GLA in Lobbying national Government to provide new powers and improved coordination for river and maritime vessels, including having a single regulatory authority for the Thames and London tributaries and introduce minimum emissions standards	Pollution Team	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing		This proposal is included in the Mayor of London’s draft Environment Strategy 2017.

**Appendix A Report on the consultation of the Draft Air Quality Action Plan**

See separate attached document.

**Appendix B Reasons for Not Pursuing Action Plan Measures**

**Table B.1 Action Plan Measures Not Pursued and the Reasons for that Decision**

Action category	Action description	Reason action is not being pursued (including Stakeholder views)
Emissions from developments and buildings		
Public health and awareness raising		
Delivery servicing and freight		
Borough fleet actions		
Localised solutions		
Cleaner transport	Speed Control Measures	Tower Hamlets has already introduced a borough wide 20mph zone.
Cleaner transport	Free or discounted residential parking permits for zero emission cars	Residential parking permits for electric vehicles are already heavily discounted.

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## **Tower Hamlets Air Quality Partnership Board**

### **Draft Terms of Reference (Agreed 20.12.2017)**

#### **1. Introduction**

- 1.1 The Tower Hamlets Air Quality Action Plan 2017 (AQAP) sets out the Council's agreed action plans designed to contribute towards achieving reductions in specified air pollutants across the borough.
- 1.2 The AQAP meets the statutory requirement for such a plan under Part IV of the Environment Act 1995. It has been developed through a consultative process and is aligned with the Mayor of London's *London Local Air Quality Management (LLAQM) Policy Guidance 2016*.
- 1.3 In recognition of the important contribution that the agreed actions can have in relation to tackling climate change and poor air quality, and in improving the health of local people, workers and visitors to the borough, the Mayor of Tower Hamlets, supported by the Lead Member - Regeneration and Air Quality, has determined that a board be established to provide regular oversight and ensure effective delivery and future development of the AQAP.
- 1.4 Overall responsibility for the implementation of the plan and for statutory reporting sits with Tower Hamlets Environmental Health services but the actions within the plan are cross cutting will be implemented and monitored by the relevant council departments. The Divisional Director strategy, policy and performance will maintain strategic oversight of the plan and its delivery, collating monitoring information, co-ordinating service reporting to the board and ensuring that further developments of the plan are incorporated into relevant strategic programmes and service area work-streams.
- 1.5 The Council's AQAP should not exist in isolation from the actions of other persons and organisations, so in addition to the Mayor, Member and council officer membership, the board will adopt a collaborative approach, being comprised of and engaging with representatives from key parts of the public, private and third sector, exploring opportunities to maximise impact through co-production, supporting and effecting relevant actions beyond the AQAP.

#### **2. Membership**

- 2.1 The Air Quality Partnership Board will be comprised of the following elected individuals and co-opted external representatives. Council officer attendees\* will vary to ensure representation is appropriate to the meeting agenda items:
  - Mayor of Tower Hamlets (Chair)
  - Lead Member for Regeneration & Air Quality
  - Lead Member for Environment

## **Tower Hamlets Air Quality Partnership Board**

### **Draft Terms of Reference (Agreed 20.12.2017)**

- \*Corporate Director Place (or nominated representative)
- \*Tower Hamlets Director of Public Health (or nominated representative)
- \*Tower Hamlets Communications (nominated representative)
- Health & Wellbeing Board nominated representative
- NHS CCG nominated representative
- THCVS nominated representative
- Tower Hamlets Wheelers nominated representative
- QMUL sustainability representative
- Hackney and Tower Hamlets Friends of the Earth (Kate Hand)
- Our Air Our Health (Alex Moore)
- RP/THHF representation (Swan, Poplar HARCA, etc.).
- TH Carers nominated representative
- Tower Hamlets Schools Forum (nominated representative)
- Parents and support groups (local groups who might want to be involved tbc)
- Better Streets (nominated representative)

### **3. Frequency of meetings and other arrangements**

- 3.1 The meetings will be scheduled for March, June, September and December each year, or at such other frequency as may be determined by the Chair in consultation with the board membership, and so as to ensure that feedback on progress against actions can be compiled in March and included in the Annual Status Report required to be submitted to the GLA each April.
- 3.2 The Divisional Director strategy, policy and performance will schedule the meetings and circulate the agenda and will arrange for minutes to be taken.
- 3.3 Work arising out of the board can be conducted outside of formal meetings via e-mail or collaborative meetings between board members outside of the formal schedule.

### **4. Role and purpose**

- 4.1 The AQP Board is established to have oversight of the implementation of the agreed Tower Hamlets Air Quality Action Plan, ensuring timely and effective delivery and reporting.
- 4.2 The board will engage with and support the process to development future revisions of the plan.
- 4.3 The board will consider, develop and promote opportunities for co-production with groups external to the Council with a view to ensuring



## **Tower Hamlets Air Quality Partnership Board**

### **Draft Terms of Reference (Agreed 20.12.2017)**

that data and information is shared, resources are efficiently deployed and the impact of actions to improve air quality are maximised

- 4.4 The board will work collaboratively to identify and promote action in relation to:
- All factors that are of influence to local air quality including emerging developments and trends
  - The existing programmes across the borough and regionally that contribute to emissions reductions (or increases) ensuring that these can be accounted for within the AQAP.
  - The adequacy of information available to clearly define effective measures along with any actions to improve information collection and reporting;
  - The success or otherwise of existing actions in place to reduce emissions and the consideration of new or amended actions to ensure success in improving air quality across Tower Hamlets.

## **5. Terms of reference**

The board will:

- 5.1. Maintain oversight of the delivery of the AQAP and test compliance with the London Local Air Quality Management statutory requirements including annual reporting on pollution levels;
- 5.2. Review local infrastructure and development proposals with a view to ensuring an energy efficient built environment with an integrated travel provision;
- 5.3. Engage with public health awareness raising with a view to driving behavioural change to lower emissions as well as to reduce exposure to air pollution;
- 5.4. Support and promote actions to improve safe and sustainable transport, and reduced traffic congestion;
- 5.5. Seek opportunities to reduce transport related emissions and address climate change and local air quality problems;
- 5.6. Work collaboratively to create better environments for people;
- 5.7. Develop the approach to lobbying and partnership working: working with stakeholders including National Government, the Greater London Authority & Transport for London to ensure policies adequately address the issue of air quality.

## **Tower Hamlets Air Quality Partnership Board**

### **Draft Terms of Reference (Agreed 20.12.2017)**

- 5.8. Focus on air quality across the borough of Tower Hamlets but not to the exclusion of engagement with other authorities or with groups that have a regional coverage where such engagement can have a positive influence and impact on local air quality improvements.

#### **6. Relationship with other groups**

- 6.1 The AQPB will operate as a partnership board having a structural relationship to the Tower Hamlets Partnership Executive Board (Note: The specific partnership structures and relationships are currently under review). The functions of the board will relate to the development and delivery of the strategic objectives and outcomes as defined in the Tower Hamlets Community Plan.
- 6.2 AQPB members representing their services or organisations will be expected to liaise directly with their Executives and/or Management Teams as appropriate on actions and decisions of the board specific to their responsibilities and to secure engagement, broker consensus, organise actions and otherwise implement the decisions of the AQPB, reporting back as required.
- 6.3 The AQPB may from time to time establish Sub Groups or working parties to focus on specific issues or identified geographical areas of concern which will then report back to it. Membership of these Sub Groups will be drawn from those listed above.
- 6.4 (Subject to resolution of Partnership structures) The AQPB will report relevant findings or proposals to the Partnership Executive by way of meeting records/minutes, update reports and presentations as determined to be appropriate by the Chair of the board or as may from time to time be requested by the Partnership Executive. The Executive may be asked to endorse any recommendations from the AQPB for onward action by the Partnership members.

# London Borough of Tower Hamlets Air Quality Annual Status Report for 2017

Date of publication: May 2018



This report provides a detailed overview of air quality in Tower Hamlets during 2017. It has been produced to meet the requirements of the London Local Air Quality Management statutory process<sup>1</sup>.

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<sup>1</sup> LLAQM Policy and Technical Guidance 2016 (LLAQM.TG(16)). <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-boroughs>

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## **Abbreviations**

AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
AQO	Air Quality Objective
BEB	Buildings Emission Benchmark
CAB	Cleaner Air Borough
CAZ	Central Activity Zone
EV	Electric Vehicle
GLA	Greater London Authority
LAEI	London Atmospheric Emissions Inventory
LAQM	Local Air Quality Management
LLAQM	London Local Air Quality Management
NRMM	Non-Road Mobile Machinery
PM <sub>10</sub>	Particulate matter less than 10 micron in diameter
PM <sub>2.5</sub>	Particulate matter less than 2.5 micron in diameter
TEB	Transport Emissions Benchmark
TfL	Transport for London

**Table A. Summary of National Air Quality Standards and Objectives**

<b>Pollutant</b>	<b>Objective (UK)</b>	<b>Averaging Period</b>	<b>Date<sup>1</sup></b>
Nitrogen dioxide - NO <sub>2</sub>	200 µg m <sup>-3</sup> not to be exceeded more than 18 times a year	1-hour mean	31 Dec 2005
	40 µg m <sup>-3</sup>	Annual mean	31 Dec 2005
Particles - PM <sub>10</sub>	50 µg m <sup>-3</sup> not to be exceeded more than 35 times a year	24-hour mean	31 Dec 2004
	40 µg m <sup>-3</sup>	Annual mean	31 Dec 2004
Particles - PM <sub>2.5</sub>	25 µg m <sup>-3</sup>	Annual mean	2020
	Target of 15% reduction in concentration at urban background locations	3 year mean	Between 2010 and 2020
Sulphur Dioxide (SO <sub>2</sub> )	266 µg m <sup>-3</sup> not to be exceeded more than 35 times a year	15 minute mean	31 Dec 2005
	350 µg m <sup>-3</sup> not to be exceeded more than 24 times a year	1 hour mean	31 Dec 2004
	125 µg m <sup>-3</sup> not to be exceeded more than 3 times a year	24 hour mean	31 Dec 2004

Note: <sup>1</sup> by which to be achieved by and maintained thereafter

## 1. Air Quality Monitoring

### 1.1 Locations

Table B. Details of Automatic Monitoring Sites for 2017

Site ID	Site Name	Coordinates		Site Type	In AQMA	Distance from monitoring site to relevant exposure (m)	Distance to kerb of nearest road (N/A if not applicable) (m)	Inlet height (m)	Pollutants monitored	Monitoring technique
		X	Y							
	Poplar	537509	180867	Roadside	Y	N/A	N/A	4	NO <sub>2</sub> , PM <sub>10</sub> , O <sub>3</sub>	Station closed
TH2	Mile End	535927	182221	Roadside	Y	1m (offices)	3	3	NO <sub>2</sub>	Chemiluminescence
TH004	Blackwall <sup>2</sup>	538290	181452	Roadside	Y	15m (residential)	3	3	NO <sub>2</sub> , PM <sub>10</sub> , PM <sub>2.5</sub> , O <sub>3</sub>	Chemiluminescence UV photometric FDMS (for PM)
TH002	Victoria Park	536487	184238	Background	Y	290m (residential)	300	2	NO <sub>2</sub> , SO <sub>2</sub> , PM <sub>10</sub>	Chemiluminescence UV fluorescence TEOM
TH001	Milwall Park	538052	178559	Background	Y	???	60	1.5	NO <sub>2</sub> , PM <sub>10</sub> , O <sub>3</sub>	Chemiluminescence BAM; UV absorption

<sup>2</sup> Site operated by Transport for London

Table C. Details of Nitrogen Dioxide Non-Automatic Monitoring Sites for 2017

Site ID	Site name/Location	X	Y	Site Type	Distance to relevant exposure (meters)	Distance to kerb (meters)	Inlet Height (meters)
1	Colombia Rd/Gossett Street	533883	182815	Roadside	6	0.5	2.2
2	Calvert Ave/Boundary Street	533507	182569	Roadside	3	3	2.2
3	Bethnal Green Rd/ Brick Lane	533875	182437	Roadside	2	0.5	2.2
4	Commercial St/Calvin St	533583	182066	Roadside	4	1.5	2
5	Whitechapel High St (KFC)	533985	181426	Roadside	3	0.5	2
6	Mansell St	533801	180726	Roadside	5	1	2
7	St Katherine's Way	533984	180373	Background	8	n/a	2
8	Wapping High St/Sampson St	534444	180122	Roadside	5	2	2
11	Brick Lane/Princelet St	533866	181860	Roadside	1	1	2
12	Buckfast St/Bethnal Green Rd	534259	182580	Roadside	1	0.5	2.2
14	Warner Place/Hackney Rd	534255	183130	Roadside	10	2	2.2
16	Paradise Row/Bethnal Green Rd	534959	182757	Roadside	1	1	2
17	Finnis St/Three Colts Lane	534783	182385	Roadside	3	0.5	2.2
18	Sidney St/Mile End Rd	534968	181878	Roadside	3	0.5	2
19	Philpot St/Commercial Road	534816	181321	Roadside	5	0.5	2
20	Dellow St/The Highway	534951	180779	Roadside	4	7	2.2
22	Wapping Wall/Garnet St	535132	180337	Roadside	1	2	2.2
23	Brodlove Lane	535598	180816	Roadside	4	0.5	2.2
24	Jubilee Street/Commercial Rd	535150	181279	Roadside	11	1	2.2
25	Cavell St/Stepney Way	534884	181667	Roadside	35	1.5	2.2
26	Hannibal Rd/Mile End Rd	535392	182010	Roadside	4	10	2.1



28	Bonner Road	535356	183223	Roadside	6	1	2.2
29	Grove Rd/Old Ford Rd	535930	183385	Roadside	5	0.5	2.2
30	Fieldgate Street	534232	181584	Roadside	6	0.5	2.2
31	Whitechapel Market	534516	181744	Roadside	14	0.5	2
32	Globe Rd/Mile End Rd	535295	182820	Roadside	9	0.5	2
33	Stepney Green	535545	181604	Background	120	10m	
36	Locksley St/St Paul's Way	536702	181646	Roadside	30	5	2.2
37	Rhodeswell Rd	536574	181338	Roadside	4	0.5	2.2
38	Ben Johnson Road	536080	181721	Roadside	5	0.5	2.2
39	Harford St/Mile End Rd	536089	182258	Roadside	7	0.5	2
41	Ford Close/Roman Rd	536457	183301	Roadside	0.1	1.5	2.2
42	Victoria Park (Co-location site)	536494	184170	Background	300	n/a	2.2
43	Victoria Park (Co-location site)	536494	184170	Background	300	n/a	2.2
44	Parnell Rd/Old Ford Rd	536874	183741	Roadside	5	1	2.2
45	St Stephen's Rd/Tredegar Rd	536713	183070	Roadside	3	0.1	2
46	Rhondda Grove/Mile End Rd	536542	182589	Roadside	8	0.5	1.5
47	Wentworth Mews	536452	182454	Roadside	10	1	2.2
48	Ackroyd Drive	536767	181771	Roadside	25	0.5	2.2
49	Dod St/Burdett Rd	537026	181227	Roadside	2	0.5	2.2
50	Rich Street	536937	180987	Roadside	4	0.5	2.2
51	Watney Market	534938	181257	Background	8	20m	2.2
52	Wick Lane/Autumn St	537304	183619	Roadside	3	0.5	2.2
53	Fairfield Road/Tredegar Road	537159	183415	Roadside	3	0.5	2.2
54	Bow Rd /Glebe Terrace	537525	182887	Roadside	3	4	2.4
55	TH Cemetery Park	536730	182363	Background	15	7	2.2
56	Bow Common Lane/St Paul's Way	537248	181820	Roadside	15	2	2.3

58	Dolphin Lane	537539	180688	Roadside	5	2	2.2
59	Westferry Road/Limehouse Link jnct	537100	180791	Roadside	25	2	2.2
60	Cascades, Westferry Road	537115	180074	Roadside	15	0.5	2.2
61	Bow Rd/Alfred St	537056	182773	Roadside	6	6.5	2.2
62	Mast House Terrace	537348	178690	Roadside	4	2	2.2
63	Millwall Park	538259	178688	Background	250	n/a	2.2
64	Limeharbour	537953	179357	Roadside	10	2	2.2
65	Manchester Road/East Ferry Road	538033	178360	Roadside	3	0.5	2.2
66	Millwall Park	538247	178689	Background	250	n/a	2.2
67	Seyssel Street	538545	178767	Roadside	20	2	2.2
68	Manchester Road/Ollife Street	538432	179044	Roadside	6	6	2.2
69	Lawnhouse Close	538191	179750	Roadside	80	2	2.2
72	Prestons Road/ Coldharbour	538364	180188	Roadside	3	2	2.2
73	John Smith Mews	538742	180756	Roadside	10	0.5	2.2
75	Hale Street	537661	180768	Roadside	7	0.5	2.2
76	Chrip Street/E India Dock Road	537940	181021	Roadside	20	1	2.2
77	Morris/Barchester Street	537731	181761	Roadside	4	1	2.4
78	Devons Road / Campbell Road	537577	182232	Roadside	15	2	2.2
79	Hatfield Terrace/Fairfield Road	537356	183059	Roadside	6	2.2	2.2
80	Wrexham Road	537581	183208	Roadside	10	2.1	2.2
81	Bromley High Street/ St Leonards	537868	182912	Roadside	6	2	2.2
82	Devas Street /Devons road	537821	182332	Roadside	6	2	2.2
83	Zetland Street/A12	538178	181747	Roadside	50	1	2.2
84	Blair Street (End of Street)	538366	181180	Roadside	15	3	2.2
85	Portree Street	538895	181296	Roadside	4	2	2.2
86	Newport Avenue	538955	180872	Roadside	12	1	2.2

89	Thames Path Storers Quay	538730	178733	Background	30	30	2.4
90	Sextant Avenue	538674	178887	Roadside	4	1	2.2

## 1.2 Comparison of Monitoring Results with AQOs

The results presented are after adjustments for “annualisation” and for distance to a location of relevant public exposure, the details of which are described in Appendix A.

**Table D. Annual Mean NO<sub>2</sub> Ratified and Bias-adjusted Monitoring Results (µg m<sup>-3</sup>) – Automatic Sites**

Site ID	Site type	Valid data capture for monitoring period % <sup>a</sup>	Valid data capture 2017 % <sup>b</sup>	Annual Mean Concentration (µg m <sup>-3</sup> )						
				2011 <sup>c</sup>	2012 <sup>c</sup>	2013 <sup>c</sup>	2014 <sup>c</sup>	2015 <sup>c</sup>	2016 <sup>c</sup>	2017 <sup>c</sup>
TH1 Poplar	Automatic	n/a	n/a	34	33	33	n/a	n/a	n/a	n/a
TH2 Mile End	Automatic	99	100%	<b>57</b>	<b>60</b>	<b>57</b>	<b>62</b>	<b>53</b>	<b>51.7</b>	<b>48</b>
TH4 Blackwall	Automatic	97	100%	<b>63</b>	<b>61</b>	<b>58</b>	<b>58</b>	<b>58</b>	<b>59</b>	<b>56</b>
TH5 Victoria Pk	Automatic	98	100%	-	33	33	<b>44c</b>	33c	32.0	32
TH5 Millwall Pk	Automatic	99	100%	--	-	-	-	26c	25.3	26

**Note:** Areas where the National Objective Level 40 ( $\mu\text{g m}^{-3}$ ) is being breached is shown in **bold**

**Table D contd. Annual Mean NO<sub>2</sub> Ratified and Bias-adjusted Monitoring Results ( $\mu\text{g m}^{-3}$ ) – Diffusion Tube Sites Exceedance in Annual average in **bold****

Site ID	Location	Valid data capture for monitoring period % <sup>a</sup>	Valid data capture 2017 % <sup>b</sup>	Annual Mean Concentration ( $\mu\text{g m}^{-3}$ )						
				2011 <sup>c</sup>	2012 <sup>c</sup>	2013 <sup>c</sup>	2014 <sup>c</sup>	2015 <sup>c</sup>	2016 <sup>c</sup>	2017 <sup>c</sup>
1	Colombia Rd/Gossett Street	100%	100%					38	37	39
2	Calvert Ave/Boundary Street	92%	100%					<b>42</b>	<b>41</b>	<b>40</b>
3	Bethnal Green Rd/Brick Lane	92%	100%					<b>47</b>	<b>46</b>	<b>45</b>
4	Commercial St/Calvin St	75%	100%					<b>66</b>	<b>60</b>	<b>60</b>
5	Whitechapel High St (KFC)	100%	100%					<b>72</b>	<b>64</b>	<b>62</b>
6	Mansell St	83%	100%					<b>84</b>	<b>71</b>	<b>75</b>
7	St Katherine's Way	100%	100%					33	34	30
8	Wapping High St/Sampson St	100%	100%					35	36	33
9		-	-					-		
10		-	-					-		
11	Brick Lane/Princelet St	100%	100%					<b>42</b>	<b>44</b>	<b>40</b>
12	Buckfast St/Bethnal Green Rd	100%	100%					<b>42</b>	<b>42</b>	39
13		-	-					-		
14	Warner Place/Hackney Rd	100%	100%					<b>42</b>	<b>42</b>	<b>41</b>

Site ID	Location	Valid data capture for monitoring period % <sup>a</sup>	Valid data capture 2017 % <sup>b</sup>	Annual Mean Concentration ( $\mu\text{g m}^{-3}$ )						
				2011 <sup>c</sup>	2012 <sup>c</sup>	2013 <sup>c</sup>	2014 <sup>c</sup>	2015 <sup>c</sup>	2016 <sup>c</sup>	2017 <sup>c</sup>
15		-	-					-		
16	Paradise Row/Bethnal Green Rd	100%	100%					50	50	42
17	Finnis St/Three Colts Lane	100%	100%					35	35	35
18	Sidney St/Mile End Rd	75%	100%					47	47	46
19	Philpot St/Commercial Road	100%	100%					54	54	51
20	Dellow St/The Highway	100%	100%					70	69	59
21		-	-					-		
22	Wapping Wall/Garnet St	100%	100%					34	37	34
23	Brodlove Lane	100%	100%					47	45	46
24	Jubilee Street/Commercial Rd	83%	100%					68	65	62
25	Cavell St/Stepney Way	100%	100%					44	45	45
26	Hannibal Rd/Mile End Rd	100%	100%					72	50	50
27		-	-							
28	Bonner Road	92%	100%					39	41	40
29	Grove Rd/Old Ford Rd	92%	100%					47	48	46
30	Fieldgate Street	100%	100%					53	48	42
31	Whitechapel Market	100%	100%					71	68	69

Site ID	Location	Valid data capture for monitoring period % <sup>a</sup>	Valid data capture 2017 % <sup>b</sup>	Annual Mean Concentration ( $\mu\text{g m}^{-3}$ )						
				2011 <sup>c</sup>	2012 <sup>c</sup>	2013 <sup>c</sup>	2014 <sup>c</sup>	2015 <sup>c</sup>	2016 <sup>c</sup>	2017 <sup>c</sup>
32	Globe Rd/Mile End Rd	92%	100%					55	54	52
33	Stepney Green	75%	100%					34	34	37
34		-	-					-		
35		-	-					-		
36	Locksley St/St Paul's Way	100%	100%					31	38	36
37	Rhodeswell Rd	92%	100%					35	39	36
38	Ben Johnson Road	83%	100%					41	45	44
39	Harford St/Mile End Rd	100%	100%					43	41	41
40		-	-					-		
41	Ford Close/Roman Rd	83%	100%					41	41	40
42	Victoria Park	100%	100%					23	24	24
43	Victoria Park	100%	100%					23	25	23
44	Parnell Rd/Old Ford Rd	92%	100%					39	41	42
45	St Stephen's Rd/Tredegar Rd	92%	100%					44	47	45
46	Rhondda Grove/Mile End Rd	92%	100%					35	41	37
47	Wentworth Mews	100%	100%					50	51	46
48	Ackroyd Drive	92%	100%					45	44	44

Site ID	Location	Valid data capture for monitoring period % <sup>a</sup>	Valid data capture 2017 % <sup>b</sup>	Annual Mean Concentration ( $\mu\text{g m}^{-3}$ )						
				2011 <sup>c</sup>	2012 <sup>c</sup>	2013 <sup>c</sup>	2014 <sup>c</sup>	2015 <sup>c</sup>	2016 <sup>c</sup>	2017 <sup>c</sup>
49	Dod St/Burdett Rd	100%	100%					37	38	38
50	Rich Street	92%	100%					42	45	42
51	Watney Market	75%	100%					38	37	34
52	Wick Lane/Autumn St	100%	100%					44	45	42
53	Fairfield Road/Tredegar Road	92%	100%					52	52	50
54	Bow Rd /Glebe Terrace	83%	100%					57	49	57
55	TH Cemetery Park	100%	100%					25	26	25
56	Bow Common Lane/St Paul's Way	92%	100%					41	43	40
57		-	-					-		
58	Dolphin Lane	100%	100%					33	36	32
59	Westferry Road/Limehouse Link jct	100%	100%					40	39	40
60	Cascades, Westferry Road	100%	100%					44	45	41
61	Bow Rd/Alfred St	92%	100%					42	44	41
62	Mast House Terrace	100%	100%					32	35	34
63	Millwall Park	92%	100%					27	29	26
64	Limeharbour	92%	100%					42	42	40

Site ID	Location	Valid data capture for monitoring period % <sup>a</sup>	Valid data capture 2017 % <sup>b</sup>	Annual Mean Concentration ( $\mu\text{g m}^{-3}$ )						
				2011 <sup>c</sup>	2012 <sup>c</sup>	2013 <sup>c</sup>	2014 <sup>c</sup>	2015 <sup>c</sup>	2016 <sup>c</sup>	2017 <sup>c</sup>
65	Manchester Road/East Ferry Road	100%	100%	-	-	-	-	31	34	32
66	Millwall Park	75%	100%	-	-	-	-	27	30	29
67	Seyssel Street	100%	100%	-	-	-	-	33	34	34
68	Manchester Road/Ollife Street	100%	100%	-	-	-	-	29	34	33
69	Lawnhouse Close	100%	100%	-	-	-	-	<b>44</b>	<b>41</b>	<b>41</b>
70		-	-	-	-	-	-	-		
71		-	-	-	-	-	-	-		
72	Prestons Road/Coldharbour	100%	100%	-	-	-	-	<b>41</b>	39	<b>40</b>
73	John Smith Mews	92%	100%	-	-	-	-	36	38	<b>40</b>
74		-	-	-	-	-	-	-		-
75	Hale Street	83%	100%	-	-	-	-	31	33	34
76	Chrip Street/E India Dock Road	92%	100%	-	-	-	-	<b>51</b>	<b>48</b>	<b>49</b>
77	Morris/Barchester Street	100%	100%	-	-	-	-	35	39	<b>40</b>
78	Devons Road / Campbell Road	100%	100%	-	-	-	-	<b>47</b>	<b>48</b>	<b>47</b>
79	Hatfield Terrace/Fairfield Road	100%	100%	-	-	-	-	31	31	33
80	Wrexham Road	100%	100%	-	-	-	-	<b>43</b>	<b>41</b>	<b>40</b>
81	Bromley High Street/St Leonards	100%	100%	-	-	-	-	37	39	38



Site ID	Location	Valid data capture for monitoring period % <sup>a</sup>	Valid data capture 2017 % <sup>b</sup>	Annual Mean Concentration ( $\mu\text{g m}^{-3}$ )						
				2011 <sup>c</sup>	2012 <sup>c</sup>	2013 <sup>c</sup>	2014 <sup>c</sup>	2015 <sup>c</sup>	2016 <sup>c</sup>	2017 <sup>c</sup>
82	Devas Street /Devons road	92%	100%	-	-	-	-	<b>47</b>	<b>50</b>	<b>48</b>
83	Zetland Street/A12	100%	100%	-	-	-	-	<b>66</b>	<b>63</b>	<b>62</b>
84	Blair Street (End of Street)	100%	100%	-	-	-	-	<b>52</b>	<b>48</b>	<b>52</b>
85	Portree Street	100%	100%	-	-	-	-	<b>48</b>	<b>48</b>	<b>48</b>
86	Newport Avenue	100%	100%	-	-	-	-	33	34	33
87		-	-	-	-	-	-			-
88		-	-	-	-	-	-	-	31	-
89	Thames Path Storers Quay	100%	100%	-	-	-	-	24	30	29
90	Sextant Avenue	92%	100%	-	-	-	-	16	28	28

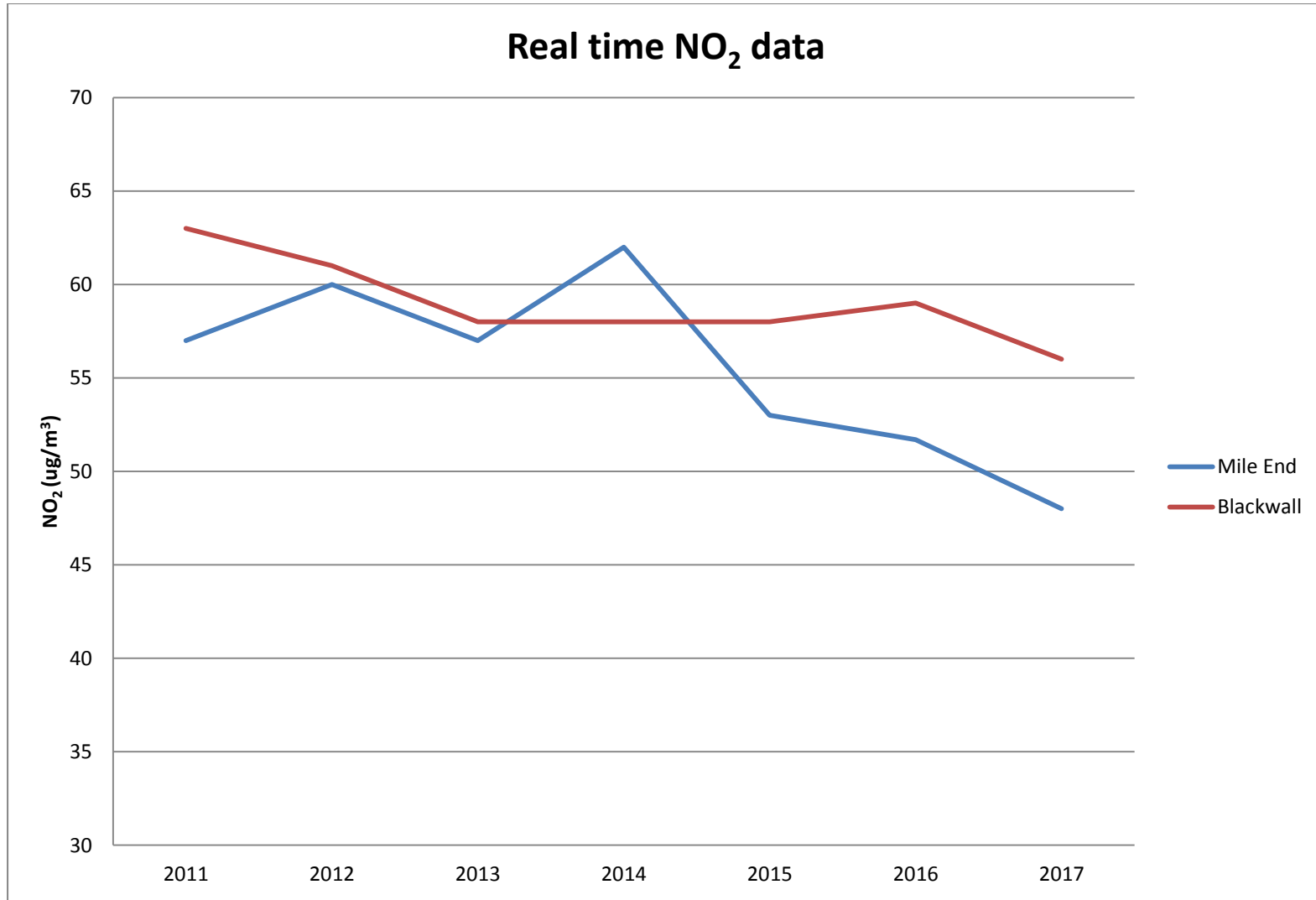
Notes: Exceedance of the NO<sub>2</sub> annual mean AQO of 40  $\mu\text{g m}^{-3}$  are shown in **bold**.

NO<sub>2</sub> annual means in excess of 60  $\mu\text{g m}^{-3}$ , indicating a potential exceedance of the NO<sub>2</sub> hourly mean AQS objective are shown in bold and underlined.

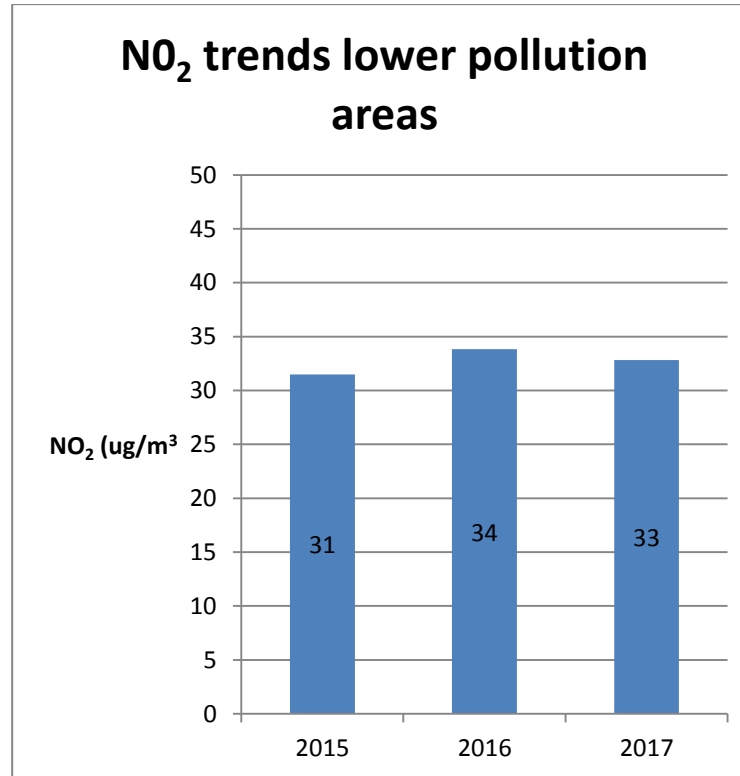
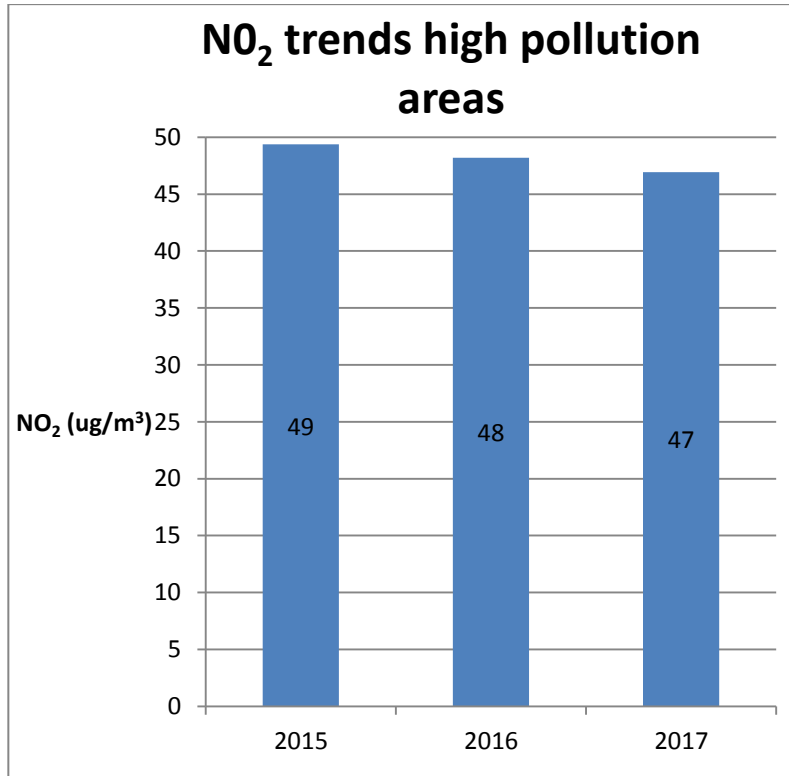
<sup>a</sup> data capture for the monitoring period, in cases where monitoring was only carried out for part of the year

<sup>b</sup> data capture for the full calendar year (e.g. if monitoring was carried out for six months the maximum data capture for the full calendar year would be 50%)

<sup>c</sup> Means should be "annualised" in accordance with LLAQM Technical Guidance, if valid data capture is less than 75%



## Nitrogen Dioxide levels at roadside real time monitoring sites



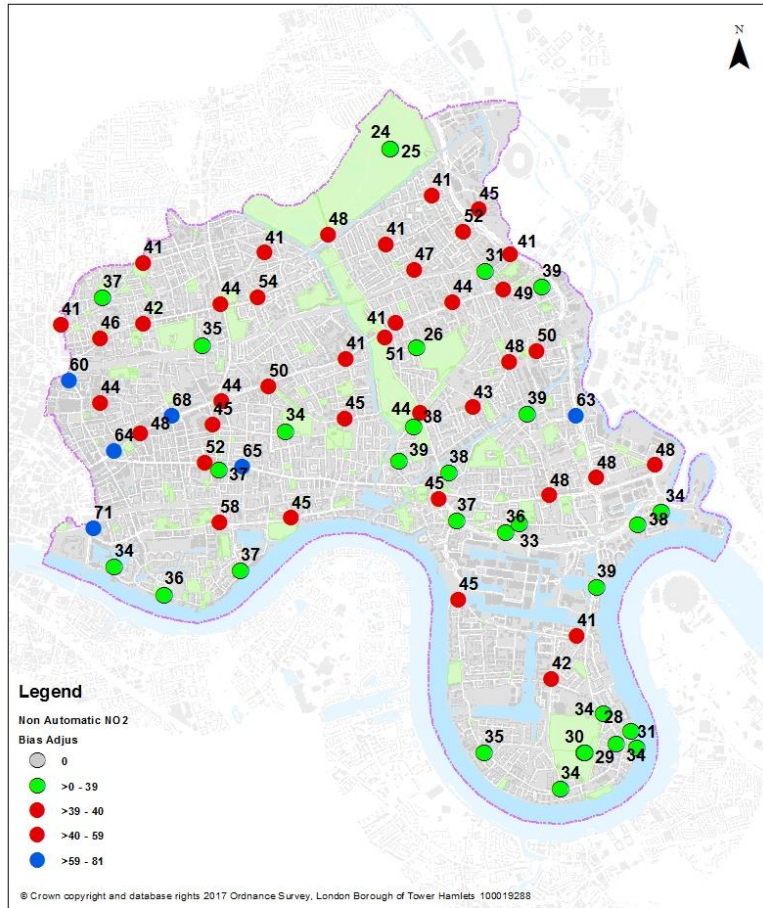
High pollution areas where Nitrogen dioxide levels exceed the National Air Quality Objective of 40 ug/m<sup>3</sup>

Lower pollution areas where Nitrogen dioxide levels does not exceed the National Air Quality Objective of 40 ug/m<sup>3</sup>

Note: data derived from diffusion tube results

Location of NO<sub>2</sub> diffusion tubes and real time monitoring networks

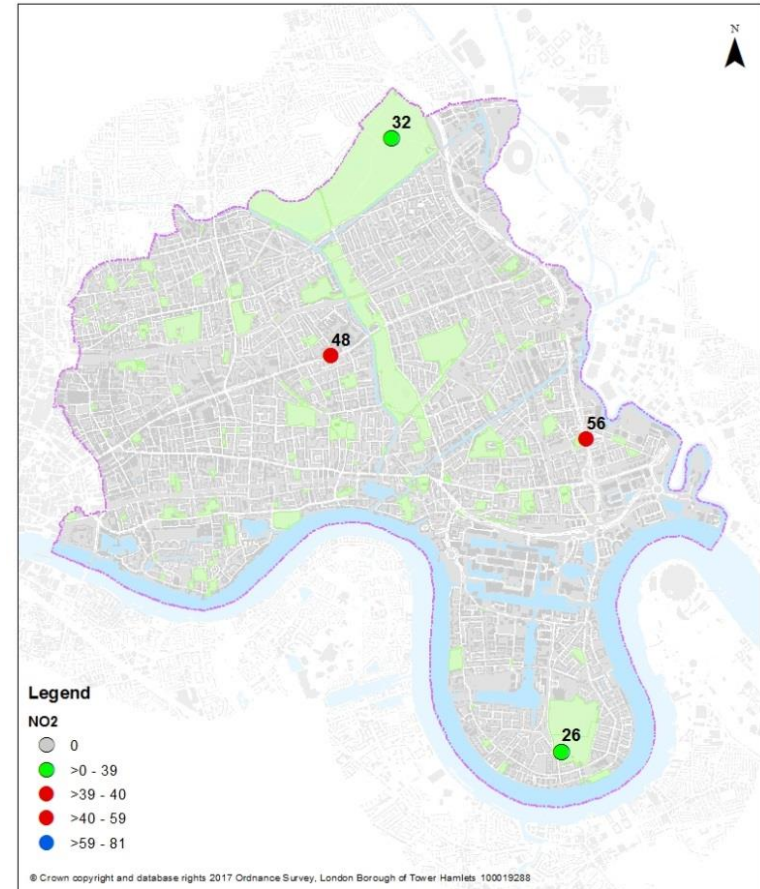
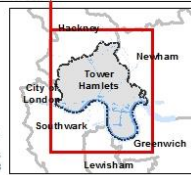
Page 372



Non-automatic NO2 stations

Scale @ 1:33,523  
 490 245 0 490 980 1,470 meters

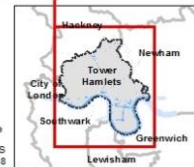
 GIS for  
 Place Directorate  
 LONDON BOROUGH OF TOWER HAMLETS  
 Date: 17/05/2018



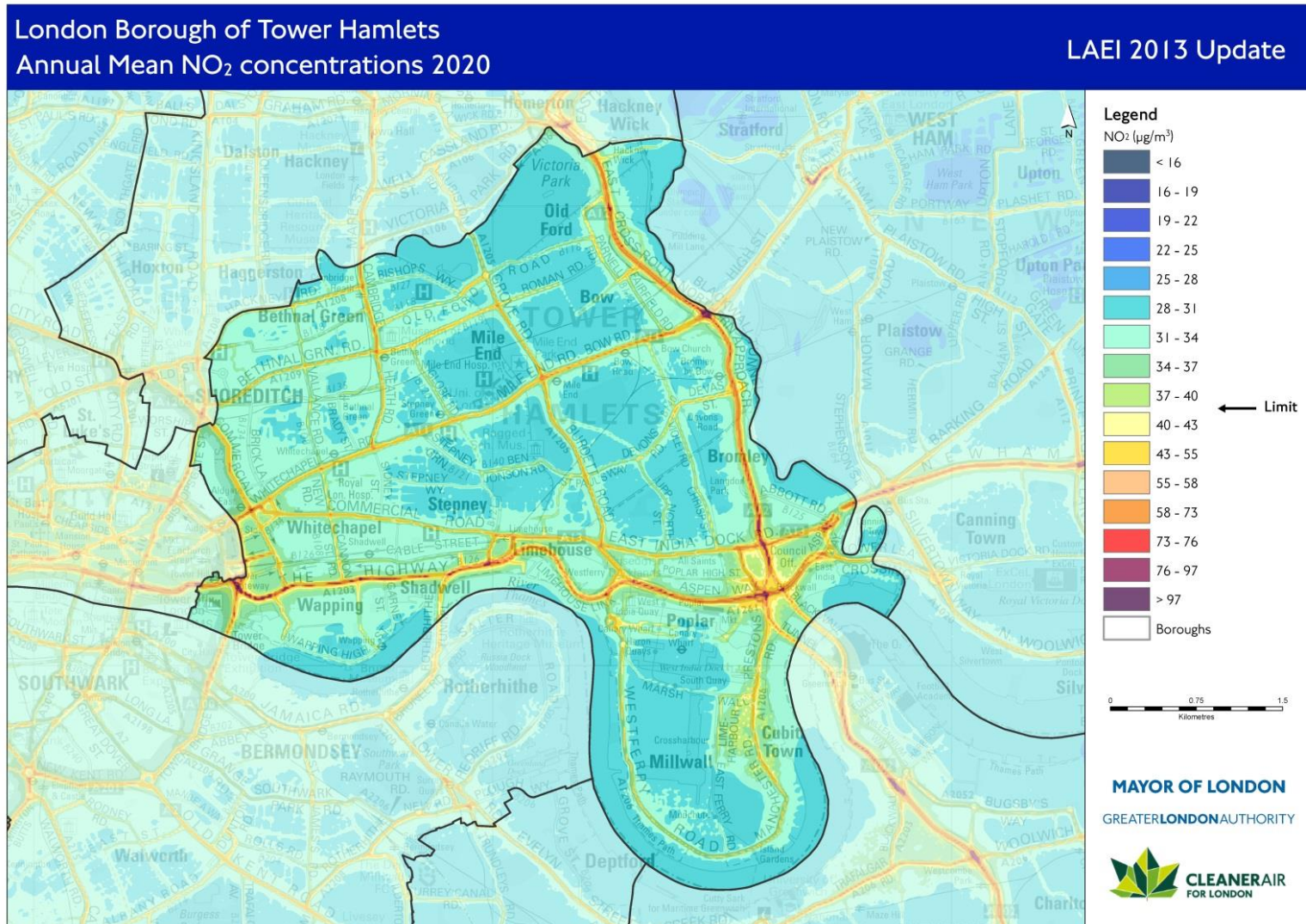
Automatic NO2 stations

Scale @ 1:33,523  
 490 245 0 490 980 1,470 meters

 GIS for  
 Place Directorate  
 LONDON BOROUGH OF TOWER HAMLETS  
 Date: 17/05/2018



The GLA have provided forecasts of the future levels of air pollution in Tower Hamlets. A plan of pollution levels is below:



The GLA have identified areas in Tower Hamlets where air pollution is particularly bad. The 'Focus Areas' identified are shown on the plan below

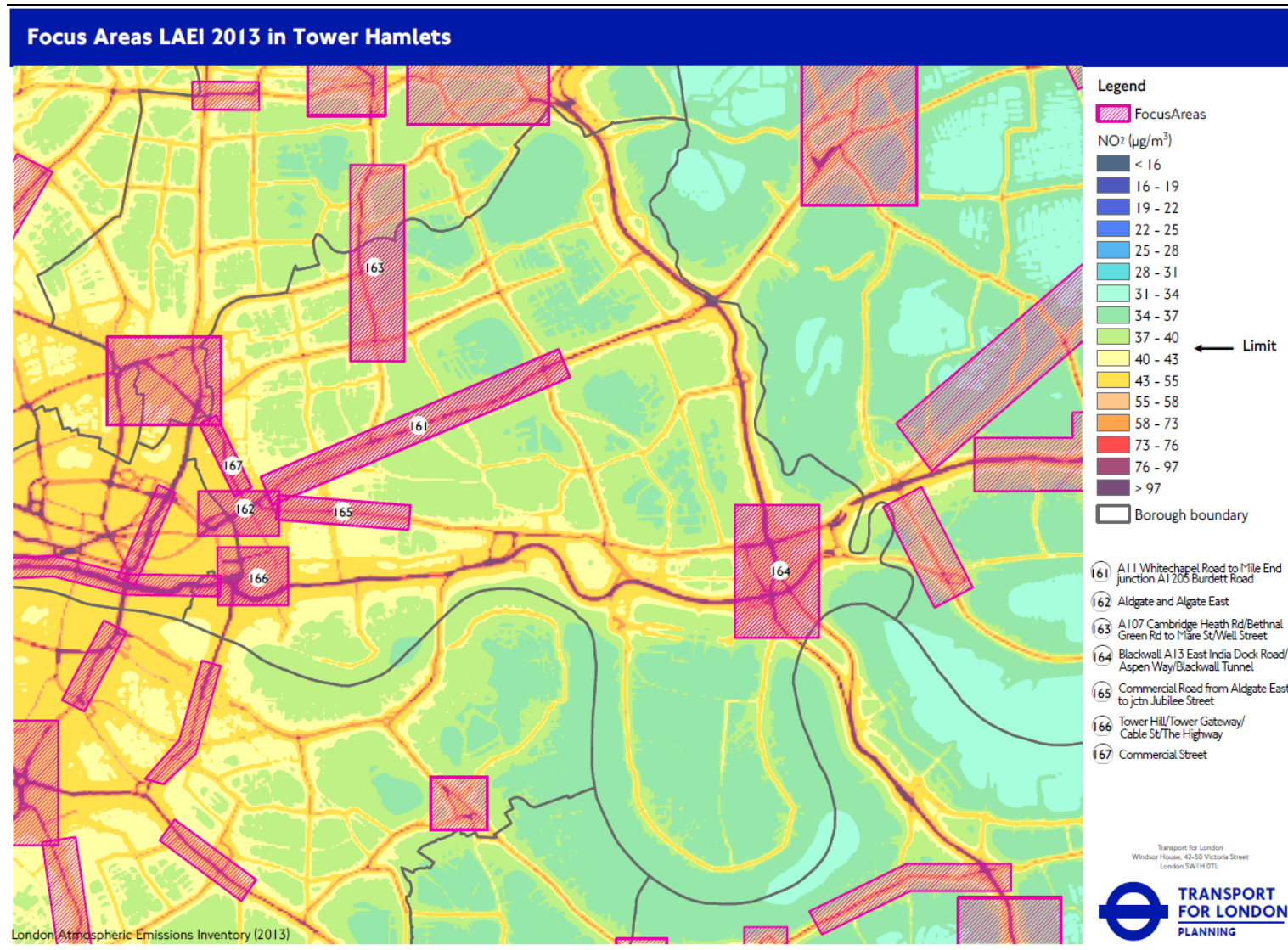


Table E. NO<sub>2</sub> Automatic Monitor Results: Comparison with 1-hour Mean Objective

Site ID	Valid data capture for monitoring period % <sup>a</sup>	Valid data capture 2017 % <sup>b</sup>	Number of Hourly Means > 200 µg m <sup>-3</sup>						
			2011 <sup>c</sup>	2012 <sup>c</sup>	2013 <sup>c</sup>	2014 <sup>c</sup>	2015 <sup>c</sup>	2016 <sup>c</sup>	2017 <sup>c</sup>
TH1 Poplar	-	-	0	0	0	-	-	-	-
TH2 Mile End	-	100%	0	2	1	1	0	0	2
TH4 Blackwall	-	100%	0	0	0	0	0	9	0
TH5 Victoria Pk	-	100%	-	0	0	0	0	0	24
TH6 Millwall Pk	-	100%	-	-	-	-	0	0	0

Notes: Exceedance of the NO<sub>2</sub> short term AQO of 200 µg m<sup>-3</sup> over the permitted 18 days per year are shown in **bold**.

<sup>a</sup> data capture for the monitoring period, in cases where monitoring was only carried out for part of the year

<sup>b</sup> data capture for the full calendar year (e.g. if monitoring was carried out for six months the maximum data capture for the full calendar year would be 50%)

<sup>c</sup> Means should be "annualised" in accordance with LLAQM Technical Guidance, if valid data capture is less than 75%

#### Commentary

Pollution where levels exceed the National Objective of 40 µg/m<sup>3</sup> of nitrogen dioxide have been showing a slow decline, this trend does not seem to be reflected on lower pollution areas away from roads where there is no clear trend. It should be emphasised that compliance with the National Objective levels does not imply that levels of nitrogen dioxide below 40 µg/m<sup>3</sup>.

**Table F. Annual Mean PM<sub>10</sub> Automatic Monitoring Results ( $\mu\text{g m}^{-3}$ )**

Site ID	Valid data capture for monitoring period % <sup>a</sup>	Valid data capture 2017 % <sup>b</sup>	Annual Mean Concentration ( $\mu\text{g m}^{-3}$ )						
			2011 <sup>c</sup>	2012 <sup>c</sup>	2013 <sup>c</sup>	2014 <sup>c</sup>	2015 <sup>c</sup>	2016 <sup>c</sup>	2017 <sup>c</sup>
TH4 Blackwall	-	100%	28	26	28	29	22	23	25
TH6 Millwall			-	-	-	-	15	17	20
TH5 Victoria Park			-	-	16	17	17	16	17

Notes: Exceedance of the PM<sub>10</sub> annual mean AQO of  $40 \mu\text{g m}^{-3}$  are shown in **bold**.

<sup>a</sup> data capture for the monitoring period, in cases where monitoring was only carried out for part of the year

<sup>b</sup> data capture for the full calendar year (e.g. if monitoring was carried out for six months the maximum data capture for the full calendar year would be 50%)

<sup>c</sup> Means should be "annualised" in accordance with LLAQM Technical Guidance, if valid data capture is less than 75%

**Table G. PM<sub>10</sub> Automatic Monitor Results: Comparison with 24-Hour Mean Objective**

Site ID	Valid data capture for monitoring period % <sup>a</sup>	Valid data capture 2017 % <sup>b</sup>	Number of Daily Means > $50 \mu\text{g m}^{-3}$						
			2011 <sup>c</sup>	2012 <sup>c</sup>	2013 <sup>c</sup>	2014 <sup>c</sup>	2015 <sup>c</sup>	2016 <sup>c</sup>	2017 <sup>c</sup>
TH4 Blackwall			32	24	24	16	8	10	10
TH5 Vic Park	-	100%	-	0	0	0	2(32.36) <sup>c</sup>	3(28.6) <sup>c</sup>	2
TH6 Millwall	-	100%	-	0	-	-	0(22.04) <sup>c</sup>	0(27.9) <sup>c</sup>	8

Notes: Exceedance of the PM<sub>10</sub> short term AQO of  $50 \mu\text{g m}^{-3}$  over the permitted 35 days per year or where the 90.4th percentile exceeds  $50 \mu\text{g m}^{-3}$  are shown in **bold**.

Where the period of valid data is less than 85% of a full year, the 90.4<sup>th</sup> percentile is shown in brackets after the number of exceedances.

<sup>a</sup> data capture for the monitoring period, in cases where monitoring was only carried out for part of the year

<sup>b</sup> data capture for the full calendar year (e.g. if monitoring was carried out for six months the maximum data capture for the full calendar year would be 50%)



<sup>c</sup> Means should be “annualised” in accordance with LLAQM Technical Guidance, if valid data capture is less than 75%

Commentary

Levels of PM<sub>10</sub> have been consistently below the National Air Quality Objectives and levels continue to fall

**Table H. Annual Mean PM<sub>2.5</sub> Automatic Monitoring Results (µg m<sup>-3</sup>)**

Site ID	Valid data capture for monitoring period % <sup>a</sup>	Valid data capture 2017 % <sup>b</sup>	Annual Mean Concentration (µg m <sup>-3</sup> )						
			2011 <sup>c</sup>	2012 <sup>c</sup>	2013 <sup>c</sup>	2014 <sup>c</sup>	2015 <sup>c</sup>	2016 <sup>c</sup>	2017 <sup>c</sup>
TH4 Blackwall	-	90%	18	15	16	16	14	20	13

Notes: Exceedance of the PM<sub>2.5</sub> annual mean 100%AQO of 25 µg m<sup>-3</sup> are shown in **bold**.

<sup>a</sup> data capture for the monitoring period, in cases where monitoring was only carried out for part of the year

<sup>b</sup> data capture for the full calendar year (e.g. if monitoring was carried out for six months the maximum data capture for the full calendar year would be 50%)

<sup>c</sup> Means should be “annualised” in accordance with LLAQM Technical Guidance, if valid data capture is less than 75%

Commentary

Levels of PM<sub>2.5</sub> have been consistently below the National Air Quality Target value. However there has been no consistent trend in values year on year. Whilst PM<sub>2.5</sub> are below target levels this does not mean that levels recorded at Blackwall do not have an impact on health.

**Table I. SO<sub>2</sub> Automatic Monitor Results: Comparison with Objectives**

Site ID	Valid data capture for monitoring period % <sup>a</sup>	Valid data capture 2017 % <sup>b</sup>	Number of: <sup>c</sup>		
			15-minute means > 266 µg m <sup>-3</sup>	1-hour mean > 350 µg m <sup>-3</sup>	24-hour mean > 125 µg m <sup>-3</sup>
TH5 Victoria	-	94.4%	0	0	0

Exceedances of the SO<sub>2</sub> AQOs are shown in **bold** (15-min mean = 35 allowed a year, 1-hour mean = 24 allowed a year, 24-hour mean = 3 allowed / year)

<sup>a</sup> data capture for the monitoring period, in cases where monitoring was only carried out for part of the year

<sup>b</sup> data capture for the full calendar year (e.g. if monitoring was carried out for six months the maximum data capture for the full calendar year would be 50%)

<sup>c</sup> Means should be “annualised” in accordance with LLAQM Technical Guidance, if valid data capture is less than 75%

## 2. Action to Improve Air Quality

## 2.1 Air Quality Action Plan Progress

Table J provides a brief summary of the London Borough of Tower Hamlets progress against the Air Quality Action Plan, showing progress made this year. The information in table J relates to the latest Air Quality Action Plan adopted by the Council in October 2017. The AQAP will be updated in 2022.

Table J. Delivery of Air Quality Action Plan Measures

ID	Action	Progress	Further information
1.	Develop and implement a communications strategy for disseminating air quality information in the borough to raise awareness of the impacts of poor air quality and encourage behaviour change.	Breathe Clean' campaign launched March 2018 Council support for independently run 'Wear AQ' project at events through LBTH in March 2018. See <a href="http://umbrellium.co.uk/initiatives/wearaq/">http://umbrellium.co.uk/initiatives/wearaq/</a>	DEFRA grant obtained for further air quality awareness raising work in Poplar
2.	Director of Public Health to have responsibility for ensuring their Joint Strategic Needs Assessment (JSNA) has up to date information on air quality impacts on the population – Air Quality officer to be consulted on JSNA.	JSNA including specific reference to air quality published in 2016 See: <a href="https://www.towerhamlets.gov.uk/lgnl/health_social_care/joint_strategic_needs_assessme/joint_strategic_needs_assessme.aspx">https://www.towerhamlets.gov.uk/lgnl/health_social_care/joint_strategic_needs_assessme/joint_strategic_needs_assessme.aspx</a>	Action to be deleted until next review of JSNA
3.	Strengthening co-ordination with Public Health by ensuring that at least one public health specialist within the borough has air quality responsibilities outlined in their job profile.	Air quality dedicated staff in Public Health Team. <ul style="list-style-type: none"> <li>• Somen Banerjee, Director of Public Health</li> <li>• Abi Knight, Associate Director of Public Health</li> <li>• Matthew Phelan, Programme Lead for Healthy Environments</li> </ul>	Further joint working planned for 2018
4.	Director of Public Health to sign off all new Air Quality Action Plans.	Air quality action plan signed off by Public Health	Current AQ Action Plan signed off by Public Health. Further revisions to be agreed.

5.	Support patients with heart and lung conditions by providing air quality advice to discharged patients, particularly vulnerable & those with heart/lung conditions. This would be a continuation of the 'Protecting Patient' work stream from the Barts Project.	Initial contact made with Associate Director for Adults who has engaged with the trust.	Further worked planned from April 2018
6.	Support and Promotion of air quality awareness programmes such as AirTEXT	LBTH had 21 new subscribers signed up between June 2016 – January 2017 and 39 between February 2017 – June 2017. Tower Hamlets currently has 265 subscribers to the service. The total number of subscribers to end of June 2017 was 237. Further promotion of the service to be programmed.	Air Text funded for financial year 2018-19 Note - the GLA are commissioning an air quality forecasting service similar to Airtext. Once this is available, the Council may want to promote the GLA service which will be at no cost to the Council and cease financial contribution to AirText in 2019-20.
7.	Encourage schools to join the TfL Sustainable Travel Active Responsible Safer (STARS) accredited travel planning programme by providing information on the benefits to schools and supporting the implementation of such a programme.	20% schools accredited in 2016/17.	Staffing issues led to reduction in STARS accredited schools in 2016/17. This been addressed and a significant increase is expected for 2017/18. 2021 target corresponds to c88 schools and is likely to require additional resource to achieve. Without additional resource, the highest level of take-up is estimated to be 50-60 schools
8.	Air quality at schools – Roll out the cleaner air for schools program that was previously run in 2 schools, to more schools in high pollution areas.	Contract with Loop labs is currently being let to roll out scheme in local primary school in 2018.	Bonner school selected (on two sites)
9.	Pollution Audits in schools. Support the GLA in their program to provide air quality audits in 2 schools.	Two schools participated in GLA audit scheme. Reports received 2018	To review contents of reports with participating schools and seek funding to implement recommended measures
10.	Schools anti-idling project	Anti-idling scheme run in two primary schools in March 2018	In Tower Hamlets we have talked to the drivers of 39 vehicles, of which 30 were idling and 9 were not idling. Of the 30 idling drivers, 26 (87%) switched off their engines when asked. Of the 3

			drivers who did not switch off their engines when asked, 2 were just about to leave and one had a permitted reason to keep idling. In total there were 72 interactions and we have spoken to 86 drivers, passengers and pedestrians in Tower Hamlets
11.	Schools Environmental Theatre Project	Contract let with Big Wheel Theatre company to run an event at 20 schools	Programme to be complete by July 2018
12.	Investigate and invest in new technology as it becomes available to reduce pollution levels at pollution hotspots & sensitive uses e.g. schools	Developments are being monitored and will be assessed by the Pollution team leader to determine practical investments.	Proposals for free standing moss wall and anti-pollution paint reviewed and rejected on the grounds that they were not likely to be effective
13.	Citizen Science air quality monitoring project	Contract let with Mapping for change company to run a project for six months jointly with Public Health Team for delivery in spring 2018.	
14.	Work with Residential Providers to develop and implement a strategy for disseminating air quality information to their tenants.	Extensive publicity campaign planned for 2018.	<ul style="list-style-type: none"> <li>• LBTH Housing Forum to be used to agree that all housing providers will cascade our messages and opportunities for residents through their regular newsletters / social media and notice boards. (The council will coordinate and cascade all messages)</li> <li>• Presentations to be made by our Air Pollution team Housing Forum.</li> <li>• Liaison with housing providers to schedule publicity with their newsletters</li> <li>• All housing providers and stakeholders will be using the same hashtags on their social media: #cleanair and #breatheclean</li> </ul>
15.	Use Health and Wellbeing Board to get existing and future public sector and RP partners to pledge to increase the number of, electric, hybrid, and cleaner vehicles in their fleets.	A paper is scheduled to go to the Health and Wellbeing Board (HWB) on 20th Feb highlighting the car fleet commitment. Public Health also intend to promote awareness for more electric charging points across the borough – but the plan is for a fuller discussion on the subject post-election.	

16.	Continue to run the 3 continuous monitoring stations, monitoring pollutants of concern to ensure air quality objectives are being met and to assess the effectiveness of local and regional policies.	Monitors maintained. Data available on line and separately in this report.	Additional PM <sub>2.5</sub> monitor is being purchased in 2018 to complement existing NO <sub>2</sub> monitor on Mile End Road at junction with Bancroft Road
17.	Continue to implement the NOx Diffusion Tube Monitoring network across the borough. Investigate and implement further monitoring where necessary. E.g. at schools.	Diffusion tube network maintained	Additional diffusion tubes will be deployed as part of the Citizen Science project. See action 13.
18.	Continue to ensure that all pollution monitoring data is available to the public and the website is regularly updated with the latest available data.	Data available on Council web site and separately in this report	
19.	Fulfil the GLA's criteria to retain our Cleaner Air Borough Status each year	Cleaner Air Borough Status retained	The GLA is in the process of revising the eligibility criteria for the award. Boroughs which currently hold the award will retain it. New criteria will be set for next year
20.	Ensuring emissions from demolition and construction are minimised via planning applications reviews and conditions attached to planning permissions requiring Construction Environmental Management Plans, including dust mitigation and monitoring and Travel Plans encouraging sustainable travel for site workers	Comments provided on major planning applications as required by GLA SPG on Control of Dust and Emissions from Construction Sites.	To set up formal recording system from April 2018 Liaison needed with planning regarding collection of data and enforcement through planning conditions.
21.	Ensuring all major developments adhere to the GLA's Non Road Mobile Machinery Low Emission Zone. I.e. All NRMM used on site must meet the emissions standards stated in the GLA's	NRMM requirements form part of conditions recommended on major developments.	To set up system to check compliance from April 2018 Liaison needed with planning regarding collection of data and enforcement through planning conditions.

	Control of Dust and Emissions during Demolition and Construction SPG 2014 (or subsequent updated guidance)		
22.	Ensuring Combined Heat and Power (CHP) and biomass air quality policies are met at all developments proposing to utilise CHP, including the NOx emission limits for heating plant as stated in the GLA's Sustainable Design and Construction SPG (or subsequent updated guidance).	Comments provided on major planning applications as required by GLA SPG on Sustainable Design and Construction	To set up formal recording system from April 2018 Liaison needed with planning regarding collection of data and enforcement through planning conditions.
23.	Ensuring new developments have suitable energy efficiency measures installed to reduce the demand for onsite heat generation from boilers & CHP's.	Our Local Plan requires energy use to be minimised as a priority in the design of the building and made energy efficient as possible. Policy is monitored through the Local Plan. March 2018	
24	Ensuring Air Quality Neutral policies are complied with at all developments and exceeded where possible. Ensure all larger developments (as defined by the GLA) will be air quality	Pollution team will provide observations when requested by Development Management for all major developments as defined in the GLA Sustainable Design and Construction SPG. New air quality officer in post from 22 January. Liaison needed with planning regarding collection of data and enforcement through planning conditions.	New Local Plan has been submitted to the Secretary of State including policy requirement for developments to be air quality neutral. Council has responded positively to the proposed new draft London Plan policy for developments to be air quality positive but requested further guidance on deliverability.
25.	Reduce the use of private cars by residents by encouraging car free developments and limiting number of parking spaces in new developments.	Measure – All major planning applications reviewed to ensure they meet the parking standards.	The adopted and emerging Local Plan include policies to restrict residential car parking (apart from mobility parking) the assumption is always that development should always be car free. New Local Plan is being submitted to the Secretary of State on 28 February 2018 including new car parking standards. The GLA's new draft London Plan includes further reduced residential parking standards.

26.	Ensure the layout of new developments considers air quality impacts, for example considering the locations of buildings with different proposed uses and locating the most sensitive use units in the least polluted areas	The Pollution Team will provide necessary comments when requested by the Development Management Service. The draft London Plan and emerging Local Plan set out more explicit policy guidance in this regard. Appropriate design and mitigation measures are considered as part of the assessment for planning applications.	New Local Plan has been submitted to the Secretary of State. It includes new policy requirement for developments to embed appropriate design and mitigation measures to respond to poor air quality.  Council has responded positively to the proposed new draft London Plan policy for developments to further consider the impact of and requirements to mitigate poor air quality.
27.	Ensuring adequate, appropriate, and well located green space and infrastructure, including for walking and cycling, is included in new developments with the Green Grid Strategy promoted and adhered to in all major planning applications and master planning to provide low emissions routes for walking and cycling.	Green Grid Strategy has been updated and the proposed new routes embedded in the draft Local Plan, which been submitted to the Secretary of State.	Public Health are undertaking a review across the Green Grid refreshed strategy, the bio-diversity action plan, open space strategy, air quality action plan and emerging physical activity strategy to identify opportunity to maximise green infrastructure increase connectivity and improve health and wellbeing.
28.	Encourage new developments to install alternative mass waste collection systems, such as ENVAC, to reduce collection vehicle emissions.	New Local Plan has been submitted to the Secretary of State and includes a new policy requirement for major developments to incorporate high quality mass waste collection systems	
29.	Ensuring that the whole borough Smoke Control Zones is fully publicised and enforced.	A publicity campaign is proposed to include TH web Pollution Team have drafted an Article and forwarded to Communications Team for publicity. To be included as part of the overall cleaner air campaign.	Publicity proposed for September at the beginning of the heating season
30.	Implement a Domestic boiler retrofit project using the GLA's RE:FIT energy efficiency retrofit programme.	£200k has been allocated for this project and there is scope to add another £600k from the carbon offsetting fund to continue this project until March 2021. The current scheme commenced in December 2017 and is anticipated to delivery 80 boiler replacements targeting the most inefficient non-	

		condensing boilers.	
31.	Implement a Carbon Emissions Reduction Programme for council properties including boiler replacements and insulation projects.	Two school projects are currently being delivered to improve energy efficiency of the buildings. Schools retrofit project - Energy efficiency improvements completed to 9 schools which includes boiler replacement, heating upgrades, insulation etc. The total fund for this project was £198k. Schools energy efficiency project - A project for schools which is a grant of up to £30k for energy efficiency works which 7 schools have successfully applied for and the works will be carried out and completed by Dec 2018. Total fund for this project was £210k.	
32.	Implement a Carbon Emissions Reduction Programme for council properties including boiler replacements and insulation projects.	£200k has been allocated for this project with a potential of another £400k over a 3 year period to be funded from the carbon offsetting fund (subject to council receiving the fund in the s106 account)	
33.	Enderby Wharf – Ensure a thorough and robust evaluation of the Environmental statement, that methodologies used comply with current guidance and that the project will not lead to any significant adverse air quality impacts in the borough.	On going working with R B Greenwich Environmental health and Planning teams to minimise pollution from this development	
34.	Ensure applications for new developments in neighbouring boroughs that have the potential to have impacts in Tower Hamlets are reviewed for air quality impacts and that no development will lead to any significant adverse air quality impacts in the borough.	Relevant applications in neighbouring boroughs (& LLDC planning area) reviewed and appropriate comments made	To set up formal recording system from April 2018
35.	Lead by example by ensuring the	Corporate Property and Capital Delivery team are	The strategy for the project will achieve: -Circa



	councils new Civic Centre is a best practice example of a sustainable and low emissions development in regards to air pollution and CO2 with both air quality neutral and carbon zero policies being met.	leading on the planning application; the relevant teams will be consulted to ensure sustainability/air quality targets are met. Building due to be occupied 2021.	3,500sqm of open space provision/public realm - Provide over 300 staff and visitor cycle parking to the site -Achieve BREEAM excellent rating -Provide renewable energy measures such as air source heat pumps and PV within design -Includes waste recycling facilities -Includes rainwater/greywater recycling facilities -Provision of brown roof -Achieving 84.3% over the baseline for the whole development in carbon reduction, meeting the LBTH policy target
36.	Improve the energy efficiency of John Onslow House as part of the upcoming refurbishment with the aim of becoming carbon zero and any new boilers to be ultra-low NOx.	New Remeha Quinta Pro and Vaillant Ecotec boilers installed	<ul style="list-style-type: none"> <li>• Remeha, Low Class 5 NOx emissions levels from 29mg/kWh (0% O2, dry) - Low pollutant emissions meet environmental regulations including BREEAM</li> <li>• Vaillant, Fully modulating low NOx burner to achieve lower NOx emissions. NOx class 5 from 36mg/kWh (0% O2, dry)</li> </ul>
37.	Ensure developments that will increase river traffic, in the operational phase of development, are thoroughly assessed for potential air quality impacts and will not have a significant negative impact on air quality.	Planning applications which have an impact on air pollution on the River will be reviewed. None noted to date	
38.	Ensure the Tideway Tunnel infrastructure project is sustainably delivered with the Construction Code of Practice adhered to and effective emissions mitigation in place during construction & operational phases.	LBTH attend forum meetings and the CCP is in place and is being monitored.	
39.	Silvertown Tunnel – Ensure a thorough and robust evaluation of the Environmental statement, that	LBTH was represented at the Development Consent Order Panel meetings and made representations on a number of matters including air quality. The	

	methodologies used comply with current guidance and that the project, during both the construction and operational phases, will not lead to any significant adverse air quality impacts in the borough and that adequate mitigation is provided for any potential impacts. Ensure traffic modelling on which the air quality statements are robust.	announcement on its findings has been delayed for a further assessment on air quality. An announcement is not now expected until May 2018.	
40.	Ensure that all future major infrastructure projects are adequately reviewed and assessed through the planning process to ensure impacts on air quality are minimised.	No new infrastructure projects other than these specifically assessed in the action plan received	Major infrastructure projects have historically been governed by acts of parliament and more recently by the development consent order process. These procedures are separate from the normal planning application process. Air quality is however, included in the requirements for the consideration of environmental impacts of such projects.
41.	Ensure that Procurement policies to include a requirement for suppliers with large fleets to have attained, silver as a minimum or gold as a preference, Fleet Operator Recognition Scheme (FORS) accreditation or equivalent.	Requirement will be incorporated as part of vehicle fleet procurement planned for 2018.	
42.	Investigate updating Procurement policies to ensure sustainable logistical measures are implemented (and include requirements for preferentially scoring bidders based on their sustainability criteria).	Sustainable Procurement Policy has been drafted and is on the agenda for Strategic Procurement Board for discussion. This policy will act as the overarching framework for all existing sustainable and ethical procurement practices	
43.	Investigate re-organisation of freight to support consolidation (or micro-consolidation) of deliveries, by setting	A constructors' forum has been established and officers already require construction management plans for major development and are additionally	The Isle of Dogs and South Poplar Opportunity Area Framework has been delayed by the GLA but is due for consultation shortly

	up or participating in new logistics facilities, and/or requiring that council suppliers participate in these.	exploring Construction Logistic Plans and Community Safety (CLOCS) systems to manage construction traffic and reduce pedestrian and cycling safety. The constructors' forum is currently for internal LBTH officers but will be expanded to include developers in areas experiencing high levels of construction.	
44.	Investigate implementing a local Eco Stars Fleet Recognition Scheme for Tower Hamlets.	Initial estimate to join EcoStars for a two year participation is in the region of £40,000. There is no identified funding for this scheme at the moment.	Without a suitable funding stream this action point will be kept under review.
45.	Join a recognised appropriate driver award scheme, e.g. Fleet Operator Recognition Scheme (FORS) or Van Excellence & achieve certification.	The Council will be joining the FORS scheme in 2018	FORS Bronze to be achieved in 2018/9. Aspiration to Achieve FORS Gold
46.	Increasing the number of, electric, hybrid, and cleaner vehicles in the boroughs' fleet.	The Competition Board has requested that a review of Fleet be carried out before procurement can proceed.	Small light duty vehicles (small vans etc) to be replaced on a rolling programme starting in 2018.  Larger light duty vehicles (Transit style) to be replaced with electric if feasible
47.	Accelerate uptake of new Euro VI vehicles in borough fleet, ending the purchase of diesel vehicles where feasible.	The Competition Board has requested that a review of Fleet be carried out before procurement can proceed.	Where electric vehicles are not feasible, remaining fleet will be replaced with Euro 6 diesels in 2018-2019
48.	Real-time Telematics monitoring of fleet driver behaviour and subsequent driver training.	The Competition Board has requested that a review of Fleet be carried out before procurement can proceed.	Telematics to be installed in all internal combustion driven vehicles as the fleet is to be renewed
49.	Utilise round optimisation for council fleet to reduce vehicle miles.	Newly appointed fleet manager to review	A review of fleet usage is being planned to minimise the number of Council owned vehicles
50.	Procure a cargo bike for regular delivery of literature to councillors.	Parks Dept already have 2 cargo bikes in use in Victoria Park. Require FM to confirm the bike will be used and post drivers trained to cycle. Update Feb 12 2018 : No further progress as no confirmation from	

		FM that bikes can be used.	
51.	Project 2020: use the procurement process to ensure all waste & Recycling collection vehicles in the new contract are as low emission as possible by prioritising tenders with the highest proportion of low emission vehicles.	The Council is currently exploring what the options are likely to be in terms of low emissions vehicles for the waste collection and street cleansing fleet. Proposals will be put forward within the waste contracts report that will be considered by the Council before the procurement process commences	The procurement process for the new waste contract is expected to commence in Summer 2018. This action will be incorporated into the tendering process.
52.	Project 2020: utilise route optimisation to reduce vehicle mileage for waste collections.	The procurement process for the new waste contract is expected to commence in Summer 2018.	The opportunity for route optimisation to be implemented under the current contract with Veolia is being explored as well as the incorporation of route optimisation as part of the procurement process for the new contract in 2020. Options for route optimisation software are currently being explored
53.	Reduce 'Grey Fleet' impacts by reviewing staff parking permits to reduce number or allocate shared team permits rather than individual.	Staff travel plan is to be reviewed in 2018	
54.	Investigate installing Green Infrastructure, such as green walls, green screens or living roofs at schools/residential developments in polluted areas. Linking in with the Green Grid and Open Paces Strategy.	Project has not been scoped yet and is funding dependent. Will be taken forward when the new air quality officer joins. Could tie in with the GLA's air quality audits & do greening at the schools	
55.	Low Emission Neighbourhoods (LENs) – implement the City Fringe LEN in partnership with Hackney and Islington.	Promotional work encouraging businesses in LEN to take up corporate membership of the Santander Cycle Hire Scheme has been effective in increasing usage to the extent that it is shortlisted for a London Transport Award for Innovation in March. This project is scheduled for delivery by 2020.	ULEZ signage being agreed with TfL for delivery by Dec 2018 and Go Live April 2019 : covers part of LEN area in LBTH
56.	Engagement with businesses – Continuation of the ZEN Project engaging businesses with advice and	356 ZEN business members 30 business grants 156 household members	

	grants to enable them to reduce their air quality impact.	Comms website <a href="https://zeroemissionsnetwork.com/">https://zeroemissionsnetwork.com/</a> Twitter feed: #CleanerAirsOurBusiness (1759 followers)  LinkedIn; ebulletins; Instagram (143 followers) Various pop up events ZEN cycle hire workplace scheme, 88 cycle hire codes were provided to ZEN workplaces in Tower Hamlets and in the first 9 months of operation a total of 6216 journeys were made using the codes	
57.	Discouraging unnecessary idling by taxis, coaches and other vehicles. Anti – Idling engagement project focusing on air pollution hotspots and high risk locations such as hospitals and schools.	Two anti-idling campaigns carried out at primary schools	Campaigns held at Bonner and English Martyrs Schools. Anti idling signposts sent to borough schools
58.	Enforce anti-idling regulations by becoming a designated authority to issue Fixed Penalty Notices to idling drivers.	Action to establish designated authority status is scheduled for spring 2018. Discussions have been had with Camden Council which introduced the scheme most recently on how the implementation process. Legal advice has been sought which confirms this is a key decision and as such will require approval from the Mayor in Cabinet. The next step is to prepare a Cabinet report.	Report will go to Cabinet in 2018
59.	Increasing the proportion of electric, hydrogen and ultra-low emission vehicles in Car Clubs.	The Council has entered in to discussion with both the DriveNow and ZipCar companies to consider implementing their scheme in the near future. Both DriveNow and ZipCar Flex use ultra-low emission vehicles.	
60.	Review parking permit fee banding to encourage lower emission vehicle choice or add an additional diesel surcharge to existing permit fees.	Emission bands already exist for CO2 emissions as part of the permit pricing structure. Consideration of diesel vehicles will be discussed with elected Members after the elections.	
61.	Installation of residential electric charge	Slow chargers to be procured through CLC 4371 LOT4	Progress slow due to supplier constraints and

	points.	Street lighting Improvements contract; residents' consultation underway until Dec 22nd on requests for on-street chargers for residents. Update Feb 12 2018 : Consultation complete. PO issued for installation of 21 slow charge points in March.	electrical engineering issues. 10 in place by end of May 18. Only 1 DfT approved supplier in the country at present
62.	Installation of rapid chargers to help enable the take up of electric taxis, cabs and commercial vehicles (in partnership with TfL and/or OLEV)	Legal agreements with suppliers for rapid and fast chargers drafted and ready for signoff; site feasibility studies in progress for 23 fast charging points; final site feasibility plans awaited for the 6 sites for rapid chargers which TfL wish to deliver in 2018/19 in LBTH. Update Feb. 12 2018: Legal agreement with Source London signed and 20 sites ready for delivery. Traffic orders being drafted for site specific statutory consultation.	Sites for 15 medium charge bollards agreed and installation progressing – these will provide 37 charging points between them.  Discussions continuing with TfL on siting of 6 Rapid Charge Points.
63.	Investigate reprioritisation of road space to smooth traffic flow, reduce congestion, improve bus journey times, cycling and pedestrian experience, and reduce emissions caused by congested traffic	Healthy Street assessment included in recent design studies on Roman Road / St Stephen's Rd junction; Chrisp St / Violet Road corridor; Cotton St / Prestons Rd corridor. Update Feb 12 2018 : presentation on technique and examples of use to Health & Wellbeing Board Feb 20th.	Implementation works will take place 2018/19.  Road closure completed at William Burrough school – redesign of the space completed with school children and moving into implementation
64.	Continue to provide/ ensure provisions of infrastructure to support walking and cycling including on street residential secure parking lockers, cycle routes, cycle permeability schemes, traffic management area reviews.	Secure residential cycle parking: <ul style="list-style-type: none"> <li>• 97 spaces in individual lockers</li> <li>• 90 spaces in on street bike hangars (15 bike hangars)</li> <li>• 90 spaces in communal cycle shelters (8 shelters)</li> </ul> On-street public cycle parking: <ul style="list-style-type: none"> <li>• 50 on street cycle parking spaces (25 cycle stands)</li> </ul> Total parking spaces : 237 spaces	Development work progressing on two central London Grid E-W extensions and strategic N-S corridors on Cambridge Heath Rd and Burdett Rd corridors.
65.	Reduce traffic in the borough through the development of a new Local	The target for delivery of this work is in 2018/19 as required by TfL, due to guidance and background	New LIP 3 Guidance received March 26 2018 to guide development of the strategy.

	Implementation Plan in line with the Mayors Transport Strategy.	statistical information only now beginning to be issued by TfL.	
66.	Continue to encourage staff sustainable travel by providing Dr Bike services and staff subscriptions to the TfL cycle hire scheme for site visits. Annual update of the Staff Travel Plan to ensure it remains relevant and proactive.	Successful introduction of cycle hire scheme for staff. Usage figures to be provided in March 2018, and scheme will be expanded to include more staff during Feb/March 2018.	New staff travel plan to be produced in 2018/19. Update Feb 12 2018 : Priority actions and development of new plan agreed by CLT.
67.	Push for Tower Hamlets to be included in the ULEZ through partaking in the TfL Consultation process.	ULEZ proposed for area within North Circular Road incorporating all of LBTH	Pollution Team have provided comments on the latest consultation for ULEZ expansion to be incorporated in common response. Separate comments made to London Council's consultation
68.	Ensure responses to all government and regional consultations focus on reducing or eliminating emissions of Local air pollutants and CO2.	Recently commented on the LBTH local plan, Isle of Dogs neighbourhood Plan, DEFRA consultation on domestic solid fuel burning, TfL ULEZ proposals, and the draft London Plan.	
69.	Lobby and work with TfL to reduce emissions from buses in the borough. e.g. through green bus corridors. Work with other statutory Services to reduce emissions – LFB, NHS etc.	A11 has been designated part of the Ultra Low Emissions Bus Zone and LBTH are liaising with TfL on delivery of works to improve bus reliability and reduce queuing. Update Feb 12 2018 : No further info from TfL as yet but funding for delivery is protected in the TfL Business Plan.	TfL are progressing this action: lobbying not necessary
70.	Lobby and work with TfL to reduce emissions from TfL controlled roads e.g. through reprioritisation of road space.	Update Feb 2018: Lead Members being briefed about the conflicts of this action with the overall desired results. NO ACTION TO BE PURSUED UNTIL THE ACTION IS REVISITED. The target as currently expressed could conflict with aspirations for improvement of local neighbourhoods (i.e. by diverting traffic from trunk roads to local roads). This action will be reviewed to ensure that lobbying is focussed on appropriate actions and outcomes in relation to road space allocation and design	Lead Members briefed on the conflict with policies – this could worsen environmental quality on local roads
71.	Lobby the GLA to strengthen their Air	New Draft Environment Strategy and Draft London	

	Quality Neutral Policy and lower the CHP emission limits in current guidance.	Plan seeks to have largest developments required to be air quality positive. Further guidance awaited from the GLA following adoption of the new London Plan	
72.	The development of a Mayors Air Quality fund within Tower Hamlets.	At the Grants Sub-Committee meeting on 6 Feb, the Sub-Committee approved the implementation of a grant scheme for promoting measures to improve air quality in the borough. A publicity campaign is being worked on with Communications Team. Application will be open from May 2018 onward.	
73.	The Mayor of Tower Hamlets to hold a meeting with The Royal Borough of Greenwich and Greater London Authority to discuss reducing the environmental impact of the proposed Enderby Wharf cruise terminal. Lobby for shore-side power to be provided for the ships.	Meeting held. Liaison between officers of LBTH & RBG to control pollution. Shore side power not feasible.	
74.	Work with the Canal & Rivers Trust, the GLA and other Boroughs with canals to devise a plan to best tackle issues with emissions from canal boats. Enforcement action to be taken where necessary.	Tower Hamlets Better Boating Guide to be given out to canal boats on a regular basis.	Liaison with CRT. Meetings being set up
75.	Support the Port London Authority in the development and implementation of their Air Quality Strategy for the River Thames.	The Mayor has also raised the issue of Enderby Wharf with the Mayor of London's office and highlighted the problems caused by the fact the current statute means the Mayor of London has no jurisdiction to take action on air quality matters related to activity on the River Thames. He suggested lobbying for a change to this to give the Mayor of London oversight of air quality emissions produced on the Thames. The consultation strategy was published in early	



		December, consultation feedback to be provided. PLA Representative will update	
76.	Support the GLA in Lobbying national Government to provide new powers and improved coordination for river and maritime vessels, including having a single regulatory authority for the Thames and London tributaries and introduce minimum emissions standards	Presentation by PLA to next air quality board on their new environment strategy,	Liaison with PLA Representative specifically on the production of guidance for developers and boroughs in 2018, as well as proposals for funds improving emissions from the marine sources within the borough. Attendance to the future workshops on the progress for the strategy.

#### Lead Officers

Kelly Powell (Head of External Communications)	Mark Baigent (Interim Head of Strategy Regeneration Sustainability & Housing options)
Somen Banerjee; Abigail Knight (PH)	Zamil Ahmed: (Head of Procurement)
Jack Ettinger (Team Leader Development schools)	Richard Williams (Business Manager Operational Services)
Owen Whalley (Divisional Director - Planning and Building Control)	Margaret Cooper (Head of Engineering)
Abdul J Khan; Jonathan Taylor (Sustainability)	Stephen Willie (PR – Parking)
Fiona Heyland (Waste management)	Anita Haylock (Parking Business Development Manager)
Ann Sutcliffe: (Divisional Director, Property & Major Programmes)	Robert Morton (Active Travel Officer)
Sam Brown: (Head of Hard Services Property Maintenance Manager)	David Courcoux (Head of Mayors Office)

### 3. Planning Update and Other New Sources of Emissions

Table K.Planning requirements met by planning applications in the London Borough of Tower Hamlets in 2017

Condition	Number <u>Total numbers</u>
Number of planning applications where an air quality impact assessment was reviewed for air quality impacts	173
Number of planning applications required to monitor for construction dust	53
Number of CHPs/Biomass boilers refused on air quality grounds	3
Number of CHPs/Biomass boilers subject to GLA emissions limits and/or other restrictions to reduce emissions	33
Number of developments required to install Ultra-Low NO <sub>x</sub> boilers	24
Number of developments where an AQ Neutral building and/or transport assessments undertaken	53
Number of developments where the AQ Neutral building and/or transport assessments not meeting the benchmark and so required to include additional mitigation	35
Number of planning applications with S106 agreements including other requirements to improve air quality	-
Number of planning applications with CIL payments that include a contribution to improve air quality	-
<b>NRMM: Central Activity Zone and Canary Wharf</b> Number of conditions related to NRMM included. Number of developments registered and compliant. Please include confirmation that you have checked that the development has been registered at <a href="http://www.nrmm.london">www.nrmm.london</a> and that all NRMM used on-site is compliant with Stage IIIB of the Directive and/or exemptions to the policy.	15
<b>NRMM: Greater London (excluding Central Activity Zone and Canary Wharf)</b> Number of conditions related to NRMM included. Number of developments registered and compliant. Please include confirmation that you have checked that the development has been registered at <a href="http://www.nrmm.london">www.nrmm.london</a> and that all NRMM used on-site is compliant with Stage IIIA of the Directive and/or exemptions to the policy.	35

#### 3.1 *New or significantly changed industrial or other sources*

No new sources identified

## **Appendix A Details of Monitoring Site QA/QC**

### **A.1 Automatic Monitoring Sites**

Calibrations at Tower Hamlets Roadside, Millwall Park and Victoria Park are undertaken by Ricardo Energy and Environment. Millwall Park and Victoria Park are both urban background sites so they calibrated every 4 weeks. Tower Hamlets Roadside is calibrated every 2 weeks.

Millwall Park and Victoria Park are audited by Ricardo Energy and Environment every 6 months; in June and December.

Note: the Blackwall site is operated by Transport for London, not LBTH

#### **PM<sub>10</sub> Monitoring Adjustment**

Millwall Park – 1020 Heated BAM, correction applied

Victoria Park – TEOM, VCM correction applied

Both VCM and BAM correction is applied automatically when data is downloaded from Air Quality England web site.

### **A.2 Diffusion Tube Quality Assurance / Quality Control**

- **Lab supplying and analysing the tubes:**  
SOCOTEC Unit 12, Moorbrook, Southmead Industrial Park Didcot OX11 7HP
- **Preparation method used**  
The tubes were prepared by spiking acetone:triethanolamine (50:50) onto the grids prior to the tubes being assembled. The tubes were desorbed with distilled water and the extract analysed using a segmented flow autoanalyser with ultraviolet detection
- **Confirmation that the lab follows the procedures set out in the Practical Guidance**  
The samples have been analysed in accordance with SOCOTEC's standard operating procedure ANU/SOP/1015 Issue 1. This method meets the guidelines set out in DEFRA's 'Diffusion Tubes For Ambient NO<sub>2</sub> Monitoring: Practical Guidance.'
- **Results of laboratory precision results:**  
This analysis of diffusion tube samples to determine the amount of nitrogen dioxide present on the tube is within the scope of our UKAS schedule. Any further calculations and assessments requiring exposure details and conditions fall outside the scope of our accreditation. In the AIR PT intercomparison scheme for comparing spiked Nitrogen Dioxide diffusion tubes, SOCOTEC currently holds the highest rank of a **Satisfactory** laboratory
- **Bias adjustment factor**  
A bias adjustment factor of 0.77 was used. This was derived from DEFRA spreadsheet version number 03/18 for LBTH's contractor's lab.

#### **Factor from Local Co-location Studies (if available)**

Local co-location bias adjustment was not used

**A.3 Adjustments to the Ratified Monitoring Data**

Short-term to Long-term Data Adjustment

Not applicable

**Appendix B Full Monthly Diffusion Tube Results for 2017**

**Table M. NO<sub>2</sub> Diffusion Tube Results**

Note all sites were operational throughout 2017

Site ID	Valid data capture 2017 % <sup>b</sup>	Annual Mean NO <sub>2</sub>													
		Jan	Feb	March	Apr	May	June	Jul	Aug	Sept	Oct	Nov	Dec	Annual mean – raw data <sup>c</sup>	Annual mean – bias adjusted <sup>c</sup>
1	100%	76.5	64.2	50.9	19.1	44.4	47	43.7	45.9	53.6	60	61.7	43.7	50.5	39
2	92%	70.6	53.6	58.8	43.2	47.6	46.6	49.8	49.9	55.5	56.6	Missing	49.8	51.9	40
3	92%	77.5	59	59.7	41.6	Missing	46.6	50.2	55.4	62.7	82	62	50.2	58.3	45
4	67%	99	77.1	84.7	80.2	79.1	98.9	Missing	77.7	50.1	Missing	Missing	Missing	78.5	60
5	100%	98.9	95.2	79.2	95.1	49.7	89.3	78.5	71.2	84.4	85.4	70.5	78.5	80.9	62
6	83%	130.4	96.3	106.1	86.4	Missing	110.1	96	92	97.2	Missing	70.1	96	97.1	75
7	100%	57.6	44	34.9	33.6	33.1	35.9	33.7	36.5	42	46.7	44.8	33.7	39.1	30
8	100%	69	46.7	40.6	35.1	37.9	35.5	39.6	40.8	40.8	51.7	50.9	39.6	43.5	33
11	100%	72.7	58.8	44.4	41.9	41.7	37.9	47.5	48.6	76.3	60.7	55.7	47.5	51.8	40
12	100%	64.6	58.7	47.6	40	45	46.7	41	45.6	49.9	63.4	60.5	41	50.1	39
14	100%	69	58.8	52.9	42.2	44.8	52.1	46.7	52.9	57.7	60.1	58.1	46.7	52.9	41
16	100%	73.5	68.1	60.3	45.9	54.7	48.5	41.8	46.7	52.1	61.4	55.9	41.8	54.2	42
17	100%	68.1	50.7	46	34.8	35.7	40.8	38	40.4	47	54.8	51.6	38	45	35
18	75%	80.9	70.9	Missing	53.9	51.6	56.2	57	53	62.5	Missing	Missing	57	59.4	46
19	100%	80.5	75.5	68.1	52.9	57.5	68.1	62.3	59.8	66	75.1	73.3	62.3	65.9	51
20	100%	85.8	89.2	83.3	54.9	76.1	88.4	72.2	66	79.8	71	81.7	72.2	76	59
22	100%	66.6	46.8	41.2	41.4	38.9	40.8	35.6	40	50.2	46.8	53.8	35.6	44.6	34
23	100%	72.8	63.9	47.8	42.9	60.6	57.4	60.6	61.5	67.3	63.7	63.7	60.6	59.5	46
24	83%	98.9	90.1	75.8	83.6	75.7	85.1	75.9	75	77	Missing	Missing	75.9	80.1	62
25	100%	78.4	63.9	53	44.3	81.5	52.8	53.7	46	50.6	73.3	69.8	53.7	59.1	45
26	100%	83.1	69.3	69.1	55.1	58.8	58.9	64.2	58.8	61.9	73.3	69.2	64.2	64.6	50
28	92%	62.9	53	51.7	48.4	Missing	50.8	46.7	47.4	44.7	59.6	58.8	46.7	51.5	40
29	100%	78.3	60.4	63.5	48.8	54.7	52.9	55	57.3	59.1	66.1	56.9	55	59.4	46
30	100%	80.8	59.2	54.4	49.2	54	60.3	50.2	51.1	55.4	41.5	60.5	50.2	54.8	42
31	100%	111.1	101.1	92.5	80.1	81	91.5	83.8	80.5	91.9	94.2	85.3	83.8	89.2	69
32	83%	84.4	66.1	73.5	61.1	60.9	72.3	Missing	63.4	64.4	76.4	64.9	Missing	67.2	52
33	75%	70.9	44.6	Missing	31.6	31.5	36.5	37.3	Missing	43.5	Missing	108.8	37.3	48.1	37
36	100%	74.2	50.6	48.8	38.8	41.4	33.8	38.6	41.1	41.2	60.9	55.7	38.6	46.5	36

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37	92%	69.8	53.7	49	35.7	Missing	47	38.9	41.4	40.3	51.7	50.6	38.9	46.7	36
38	83%	87.7	67.5	Missing	Missing	46.1	48.6	48.8	47.2	50.3	68.4	62.9	48.8	57	44
39	100%	87.9	44.4	61.8	41.9	52.8	63.6	41.7	47.3	54.5	53.4	49.4	41.7	53.5	41
41	83%	65.9	51.2	57.1	Missing	Missing	53	43.4	46.9	52.4	56.3	55.8	43.4	51.9	40
42	100%	56.7	36.8	29	21.2	25.9	26.3	27.4	24.5	31.8	37.8	37	27.4	31.2	24
43	100%	50.6	38.6	32.4	20.4	25.3	23.1	27.8	27.5	25.7	38.3	35.2	27.8	30.4	23
44	92%	80.1	54.2	60.7	44	43.9	48.5	50.4	51.4	54.1	67	Missing	50.4	54.2	42
45	92%	75.7	60.3	68.3	Missing	54.1	54.1	50.8	47.6	56.6	64.8	61.2	50.8	58.1	45
46	100%	79.2	52	3.6	34.7	45.2	45.7	47.7	47	51.7	63.4	53.6	47.7	47.6	37
47	100%	76.4	65.9	71.4	52.2	54.9	58.9	57.6	50.9	51.6	67.7	61.9	57.6	59.6	46
48	92%	82.5	62.7	53.5	43.5	48.8	Missing	55.7	54.1	53.9	67.3	62.2	55.7	57.7	44
49	100%	78.4	61.3	55.5	32.9	40.2	38	40.6	45.7	43	58.4	58.5	40.6	49	38
50	92%	76.8	57.5	54.3	41.2	42.9	56.4	53	50.5	53.4	65.1	Missing	53	54.2	42
51	75%	Missing	46.5	51.5	43	38.8	45.6	35.5	43.6	60.5	Missing	Missing	35.5	44.1	34
52	100%	74.5	58.6	58	44.4	53	52.1	51.7	53.8	52.6	60	57.9	51.7	55	42
53	92%	89.3	67.3	77.7	60	61.2	71.6	61.9	52.5	61	Missing	50.5	61.9	64.3	50
54	83%	88.7	80.7	70	64	75	81.3	77.1	71.2	68.2	Missing	Missing	77.1	74.3	57
55	100%	46.8	26.5	38.8	22.2	28	30.5	30.6	28.3	34.2	45.8	36	30.6	32.6	25
56	83%	75	58.3	56.7	36.3	47.4	41.5	Missing	46.1	54.7	60.8	51.3	Missing	51.8	40
58	100%	65.5	49.5	48.3	32.1	38.6	32.3	41.4	41.8	23.7	45.6	52.3	41.4	42	32
59	100%	80.7	54.2	62	42.2	50.7	42.3	44.9	46.7	23.6	63	64.6	44.9	51.4	40
60	100%	76.4	59.9	64.1	43.4	48.1	49.1	62.1	60.2	31.9	37.2	62.2	62.1	53.5	41
61	92%	81.3	64.7	58	41.5	44.1	50.9	49.7	49.2	53.9	Missing	47.1	49.7	52.9	41
62	100%	69.9	48.5	48.4	31.5	35.3	39.7	39.5	39.7	41.6	60.6	50.9	39.5	44.7	34
63	92%	59	40.5	35.6	23.5	27.1	27.2	30.2	33.4	27	50.1	Missing	30.2	34.3	26
64	92%	77.2	54.5	56.9	45	42.6	53.2	52.1	49.2	Missing	51.6	55.6	52.1	52.5	40
65	100%	81.2	47.7	46.7	29.4	32.4	35.6	36	31.7	37.4	48.1	39.5	36	41.2	32
66	83%	50.1	47	42.2	Missing	27.6	28.5	28.4	33.1	37.7	Missing	40.6	28.4	37.2	29
67	100%	69.1	46.7	48.8	35.3	38.5	36.9	35.8	41.5	38.7	55.4	49	35.8	43.9	34
68	100%	76.8	46.3	51.9	12.9	38.3	45.2	36.8	40.5	39.1	50.8	46.4	36.8	43	33
69	100%	81.2	67.8	55.2	40.8	45.2	50.4	43.4	47.7	51	67.8	54.7	43.4	53.6	41
72	100%	74.6	57.4	51.2	47.5	49.9	50.3	45.9	48.7	55.5	48.4	52.3	45.9	52	40
73	92%	76.2	51.2	55.7	39.4	42.2	Missing	43.3	42.6	74.4	55.8	58.4	43.3	51.8	40
75	83%	74.1	Missing	46.1	33.5	Missing	30.4	41.8	34.4	44.6	54.2	55.4	41.8	44.7	34
76	92%	83.8	65.3	69.1	57.2	67.7	54	62.3	59.6	Missing	67.2	62.6	62.3	64.1	49
77	100%	81.2	56	52.6	37.6	45.8	40.8	44.1	45	58.5	69.2	48.2	44.1	51.3	40
78	100%	85.9	69.7	68.7	52.5	59.2	52.6	59.2	57.5	36	69.4	65.9	59.2	60.8	47
79	100%	69.9	50.7	47.6	32.2	35.3	37	35.5	37	59.3	43.6	43.6	35.5	43.2	33
80	100%	77.2	61.2	60.6	51	45.8	53.1	45.5	46.5	51.3	57.5	52.5	45.5	52.5	40
81	100%	78.6	59.8	58	41.7	42.8	48	45.2	42.8	47.7	48	45.5	45.2	49.6	38
82		92.7	Missing	66.9	56.4	58.4	56.8	58.5	56.8	44.9	76.3	67	58.5	62	48

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83	100%	123.3	79.6	86.9	72.5	82.5	93.7	79.8	79.4	50.7	76.9	69.4	79.8	80.4	<b>62</b>
84	100%	85.2	85.6	77.8	51.3	59.1	60.8	63.8	65.6	76.2	78	62.1	63.8	68	<b>52</b>
85	100%	84.2	75.2	72.2	49.6	54.5	60.5	53.9	50.7	59.1	73.6	61	53.9	62.3	<b>48</b>
86	100%	64.3	51	46.4	31.8	37.9	42.4	38.2	39	40.5	55.5	42.1	38.2	43.3	33
89	100%	69.3	41.6	39.6	25.3	29.4	36.3	32.2	34.1	34.9	41.5	44.4	32.2	37.8	29
90	92%	58.6	37.1	34.7	24.6	23.9	26	30.9	28.9	35.3	Missing	81.4	30.9	36.5	28

Exceedance of the NO<sub>2</sub> annual mean AQO of 40 µg m<sup>-3</sup> are shown in **bold**.

<sup>a</sup> Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year

<sup>b</sup> Data capture for the full calendar year (e.g. if monitoring was carried out for six months the maximum data capture for the full calendar year would be 50%)

<sup>c</sup> Means should be "annualised" in accordance with LLAQM Technical Guidance, if valid data capture is less than 75%

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Action category	Action ID	Action description	Department/ Team	Officer Contact - Name & Extension	Expected emissions / concentrations benefit	Timescale for implementation	Target/ measure for monitoring purposes	Further information	RAG Rating (drop down): Red - overdue or at risk Amber - delayed Green - on track Dark Green - completed	Performance update against measure	Commentary on progress towards target
Public Health and awareness raising	1	Develop and implement a communications strategy for disseminating air quality information in the borough to raise awareness of the impacts of poor air quality and encourage behaviour change.	Pollution/ Communications	Muhammad Islam x6668 Kelly Powell x4390	Indirect impact on emissions through awareness raising.	Mar-18	Measure – audience reached with air quality messages		GREEN	Programme will roll out in 2018	Breathe Clean' campaign launched March 2018 Council support for independently run 'Wear AQ' project at events through LBTH in March 2018. See <a href="http://lumbrellium.co.uk/initiatives/wearaq/">http://lumbrellium.co.uk/initiatives/wearaq/</a> DEFRA grant obtained for further air quality awareness raising work in Poplar
Public health and awareness raising	2	Director of Public Health to have responsibility for ensuring their Joint Strategic Needs Assessment (JSNA) has up to date information on air quality impacts on the population – Air Quality officer to be consulted on JSNA.	Public Health	Somen Banerjee x7014 Katy Scammell x7354 Matthew Phelan x6037	Emissions reductions are indirect and unquantifiable, but enhanced co-ordination will benefit all air quality initiatives.	Ongoing	Measure – adequate consideration given to air quality in each update of the JSNA	Already included in the most recent JSNA, must ensure that up to date info is included in future assessments.	COMPLETED	<a href="https://www.towerhamlets.gov.uk/Documents/Public_Health/JSNA/JSNA_Spatial_Plan/ra_and_health.pdf">https://www.towerhamlets.gov.uk/Documents/Public_Health/JSNA/JSNA_Spatial_Plan/ra_and_health.pdf</a>	JSNA including specific reference to air quality published in 2016 See: <a href="https://www.towerhamlets.gov.uk/ign/health_social_care/psn_strategic_needs_assessments/joint_strategic_needs_assessments.aspx">https://www.towerhamlets.gov.uk/ign/health_social_care/psn_strategic_needs_assessments/joint_strategic_needs_assessments.aspx</a> Action complete until the next review of JSNA
Public health and awareness raising	3	Strengthening co-ordination with Public Health by ensuring that at least one public health specialist within the borough has air quality responsibilities outlined in their job profile.	Public Health	Somen Banerjee x7014 Abigail Knight x7389	Emissions & concentrations reductions indirect and unquantifiable, but enhanced co-ordination will benefit all air quality initiatives.	Ongoing	Measure – at least one specialist to have AQ in their objectives		COMPLETED		Air quality dedicated staff in Public Health Team. • Somen Banerjee, Director of Public Health • Katy Scammell, Associate Director of Public Health • Matthew Phelan, Programme Lead for Healthy Environments
Public health and awareness raising	4	Director of Public Health to sign off all new Air Quality Action Plans.	Public Health	Somen Banerjee x7014 Abigail Knight x7389	Emissions & concentrations reductions indirect and unquantifiable but enhanced co-ordination will benefit all air quality initiatives.	On production of each revised action plan every 5 years	Measure – all action plans to be signed		COMPLETED	2017 plan approved. Next plan update due in 2022	Further joint working planned for 2018 The current plan was reviewed and agreed at meeting between SPP and PH on 13th December 2017. Prior consultation had taken place with DPH during its development. PH will also review the annual statutory report and summary.
Public Health and awareness raising	5	Support patients with heart and lung conditions by providing air quality advice to discharged patients, particularly vulnerable & those with heart/lung conditions. This would be a continuation of the 'Protecting Patient' work stream from the Barts Project.	Pollution/ Public Health	Muhammad Islam x6668 Somen Banerjee x7014 Matthew Phelan x6037	Protect individual health	Tbc dependent upon funding identification	KPI - no of patients engaged with on air quality messages, no of maps given out.	See Global Action Plan website for further info on the previously run project <a href="https://www.globalactionplan.org.uk/cleaner-air-with-barts-health">https://www.globalactionplan.org.uk/cleaner-air-with-barts-health</a>	AMBER		Meeting held on 3 September with partners from across the health system, to discuss actions to address air quality and asthma sufferers. Meeting scheduled for 18 Sept to discuss Air quality campaigns to embed Breathe Clean across the health service. Engagement taken place with the local pharmacy committee to discuss promotion in pharmacy of breathe clean. Engaged with clinical leads to raise awareness of breathe clean and harms of air pollution with COPD Network. Proposed action to review airTEXT to see if it is fit for purpose before roll out. Clinicians raised concerns about messaging and suggested we invest energy into the Air quality App designed by the London Healthy Living partnership
Public health and awareness raising	6	Support and Promotion of air quality awareness programmes such as AirTEXT.	Pollution Team	Muhammad Islam x6668 Matthew Phelan x6037	Protect individual health	Ongoing	KPI – AirText - no of residents signed up to service		AMBER	Annual reporting at year end.	272 subscribers in LBTH (Sept 2018)  Air Text funded for financial year 2018-19 Note - the GLA are commissioning an air quality forecasting service similar to AirText. Propose to keep airtext as GLA scheme does not have an individual alert facility. In longer term DEFRA consultation may result in a national scheme. Matt Phelan workign with the NHS to discuss roll out of the campaign. Campaign plan scheduled for Q4 2017/18.
Public health and awareness raising	7	Encourage schools to join the TL Sustainable Travel Active Responsible Safer (STARS) accredited travel planning programme by providing information on the benefits to schools and supporting the implementation of such a programme.	Development Team / School Travel Officer	Jack Ettinger x6569	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	KPI - % of schools signed up. Target 70% by 2021. Secondary KPI - % of trips made by car for schools that are part of the scheme.	2016 – 40 schools signed up so far.	AMBER	20% schools accredited in 2016/17.	20% schools accredited in 2016/17.  Staffing issues led to reduction in STARS accredited schools in 2016/17. This been addressed and a significant increase is expected for 2017/18. 2021 target corresponds to 68 schools and is likely to require additional resource to achieve. Without additional resource, the highest level of take-up is estimated to be 50-60 schools
Public health and awareness raising	8	Air quality at schools – Roll out the cleaner air for schools program that was previously run in 2 schools, to more schools in high pollution areas.	Pollution Team	Muhammad Islam x6668	NO <sub>2</sub> , PM & CO <sub>2</sub> & awareness raising	2 schools per year funding dependant	Target - project run at 2 schools per year	See: <a href="http://www.looplabs.org/case-studies/for-case-study-of-previous-project">http://www.looplabs.org/case-studies/for-case-study-of-previous-project</a>	AMBER		Contract with Loop labs is currently being let to roll out scheme in local primary school in 2018.  Bonner school selected (on two sites)  Need to update with results of Citizen Science programme offer to help Bonner and Marne schools Limited
Public Health and awareness raising	9	Pollution Audits in schools. Support the GLA in their program to provide air quality audits in 2 schools.	Pollution Team	Muhammad Islam x6668	Audit will generate a plan to reduce pollution levels.	Audits to be completed by spring 2018	Target - 2 school audits carried out and measures implemented		COMPLETED	Bonner Primary and Marne Primary	Two schools participated in GLA audit scheme. Reports received 2018  To review contents of reports with participating schools and seek funding to implement recommended measures  Deliver on actions recommended in audit. Needs input from other departments. Need to update with anti-idling actions in 2018/19. Three Anti-idling events proposed in 2018/19, September, December & March.  Columbia market & Alice Model nursery schools selected for audit in 2018-9 Bid for GLA funding to extend school. Audit made but unsuccessful. Anti-idling scheme run in two primary schools in March 2018
Public Health and awareness raising	10	Schools anti-idling project, engagement with schools and installation of anti-idling signage at school parking areas in high pollution areas.	Pollution Team	Muhammad Islam x6668	NO <sub>2</sub> , PM & CO <sub>2</sub>	All signs to be procured and installed by July year 2018	% of schools with signs installed, target 100%		GREEN		In Tower Hamlets we have talked to the drivers of 39 vehicles, of which 30 were idling and 9 were not idling. Of the 30 idling drivers, 26 (87%) switched off their engines when asked. Of the 3 drivers who did not switch off their engines when asked, 2 were just about to leave and one had a permitted reason to keep idling. In total there were 72 interactions and we have spoken to 86 drivers, passengers and pedestrians in Tower Hamlets.  Anti idling events 2018 Bonner School (March) English Martyrs (March) Wainey Market (July) Brick Lane (September)
Public Health and awareness raising	11	Schools Environmental Theatre Project	Pollution Team	Muhammad Islam x6668	Awareness raising.	Aim to run at 10 schools per year	KPI – number of schools / pupils engaged		AMBER		Contract let with Big Wheel Theatre company to run an event at 20 schools.  Programme to be complete by July 2018. Second phase to be completed. Need to update with schools visited. 15 events done and 5 remaining
Public Health & awareness raising	12	Investigate and invest in new technology as it becomes available to reduce pollution levels at pollution hotspots & sensitive uses e.g. schools	Pollution Team	Muhammad Islam x6668	NO <sub>2</sub> & PM	Ongoing	Progress will be monitored by the Pollution team leader		GREEN		Developments are being monitored and will be assessed by the Pollution team leader to determine practical investments.  Proposals for free standing moss wall and anti-pollution paint reviewed and rejected on the grounds that they were not likely to be effective  Possible liaison with Rotterdam on pollution control by sprays in tunnel portal (TL Rotherhithe & Blackwall) Investigation continues
Public Health and awareness raising	13	Citizen Science air quality monitoring project	Pollution Team	Muhammad Islam x6668	Awareness raising.	6 month project to be completed by July 2018	Target – engage 30 people in a six month project		AMBER		Contract being let with Mapping for change company to run a project for six months jointly with Public Health Team for delivery in spring 2018. Project started in April 2018 until November 2018. 79 residents have registered interest in the scheme and 29 locations are being monitored by residents using NO <sub>2</sub> tubes. Extensive publicity campaign planned for 2018.
Public Health and awareness raising	14	Work with Residential Providers to develop and implement a strategy for disseminating air quality information to their tenants.	Pollution Team/ Communications	Muhammad Islam x6668 Kelly Powell x4390	Protect individual health	Dec-18	Measure audience reached with air quality messages		AMBER		• LBTH Housing Forum to be used to agree that all housing providers will cascade our messages and opportunities for residents through their regular newsletters / social media and notice boards. (The council will coordinate and cascade all messages) • Presentations to be made by our Air Pollution team Housing Forum. • Liaison with housing providers to schedule publicity with their newsletters • All housing providers and stakeholders will be using the same hashtags on their social media: #cleanair and #breatheclean  No action
Public Health and awareness raising	15	Use Health and Wellbeing Board to get existing and future public sector and RP partners to pledge to increase the number of, electric, hybrid, and cleaner vehicles in their fleets.	Public Health	Somen Banerjee x7014 Abigail Knight x7389	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	No of pledges/updates	Link to action 45 - Eco Stars Scheme encourage fleets to sign up	GREEN		A paper is scheduled to go to the Health and Wellbeing Board (HWRB) on 20th Feb highlighting the car fleet commitment. Public Health also intend to promote awareness for more electric charging points across the borough – but the plan is for a fuller discussion on the subject post-election.
LLAQM	16	Continue to run the 3 continuous monitoring stations, monitoring pollutants of concern to ensure air quality objectives are being met and to assess the effectiveness of local and regional policies. Investigate and implement further monitoring where necessary, including a new PM <sub>2.5</sub> analyser at Mile End.	Pollution Team	Muhammad Islam x6668	Data collection only.	Ongoing	Pollution monitoring is reported on in the Annual Status Report.	Monitoring data is the evidence base for our AQMA declaration and for measuring the effectiveness of projects.	GREEN	procurement of a new PM <sub>2.5</sub> at Mile End monitoring station is being considered.	Monitors maintained. Data available on line.  Additional PM <sub>2.5</sub> monitor is being purchased in 2018 to complement existing NO <sub>2</sub> monitor on Mile End Road at junction with Bancroft Road Monitor is awaiting installation at Mile End Funds approved to removed 502 monitor at Victoria Park station and replace with BAM PM10&2.5
LLAQM	17	Continue to implement the NO <sub>x</sub> Diffusion Tube Monitoring network across the borough. Investigate and implement further monitoring where necessary. E.g. at schools.	Pollution Team	Muhammad Islam x6668	Data collection only.	Ongoing	Pollution monitoring is reported on in the Annual Status Report.	Supports Cleaner Air Borough Status	GREEN	This is ongoing on a monthly basis.	Diffusion tube network maintained. Additional diffusion tubes will be deployed as part of the Citizen Science project. Additional monitors being deployed as part of C40 project. See action 13.
LLAQM	18	Continue to ensure that all pollution monitoring data is available to the public and the website is regularly updated with the latest available data.	Pollution Team	Muhammad Islam x6668	Information sharing and awareness raising.	Ongoing	Target – 100% monitoring data available online	New data management contract, data is available on <a href="http://www.airqualityengland.co.uk/">http://www.airqualityengland.co.uk/</a> The NO <sub>x</sub> tube results are available on the Tower Hamlets Website.	GREEN	Monitoring data has been updated and is available on the web	Monitoring data has been updated and is available on the web. Web pages have also been updated. Ongoing
LLAQM	19	Fulfil the GLA's criteria to retain our Cleaner Air Borough Status each year	Pollution Team	Muhammad Islam x6668	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing and reported annually in the ASR	Target – Cleaner Air Borough Status to be achieved each reporting year.	The criteria are under 6 themes: political leadership; taking action; leading by example; informing the public; using the planning system & integrating air quality into the public health system.	GREEN		Cleaner Air Borough Status retained. The GLA is in the process of revising the eligibility criteria for the award. Boroughs which currently hold the award will retain it. New criteria will be set for next year.  Failure to join Pan London Non Road Mobile machinery scheme sponsored by GLA will put cleaner air borough status at risk. This is proposed under the Mayor's air quality fund round 3 See also action 21

Development and buildings	20	Ensuring emissions from demolition and construction are minimised via planning applications reviews and conditions attached to planning permissions requiring Construction Environmental Management Plans, including dust mitigation and monitoring and Travel Plans encouraging sustainable travel for site workers	Pollution Team/ Development Management	Muhammad Islam x6668 Owen Whalley x5314	NO <sub>2</sub> & PM	Ongoing	Reported on in annual ASR. KPI % of major planning applications, target – 100%	Air Quality Officer to be consulted on planning consultations to ensure the GLA's Control of Dust & Emissions during construction and demolition 2014SPG (or subsequent updated guidance) is applied to all major planning applications.  This policy is being strengthened in the current update of the Local Plan.	GREEN	Comments provided on major planning applications as required by GLA SPG on Control of Dust and Emissions from Construction Sites.  A process has been established to provide monthly reports to the Air Quality Officer on all major planning application received and determined, to ensure the number of developments adhering to this requirement can be reported accurately.  Liaison needed with planning regarding collection of data and enforcement through planning conditions. Ongoing
Development and buildings	21	Ensuring all major developments adhere to the GLA's Non Road Mobile Machinery Low Emission Zone. I.e. All NMM used on site must meet the emissions standards stated in the GLA's Control of Dust and Emissions during Demolition and Construction SPG 2014 (or subsequent updated guidance)	Development Management/ Pollution Team	Owen Whalley x5314 Muhammad Islam x6668	NO <sub>2</sub> & PM	Ongoing	The number of developments with the condition attached is to be reported annually in the annual status report. Monitoring will also be carried out by officers checking the NMM website and conducting site visits.	Development Management teams are including this requirement in the planning conditions for all major developments.  This is being included as a new policy in the updated Local Plan.	GREEN	NMM requirements form part of conditions recommended on major developments.  A process has been established to provide monthly reports on all major planning application received and determined, to ensure the number of developments adhering to this requirement can be reported accurately.  Liaison needed with planning regarding collection of data and enforcement through planning conditions.
Development and buildings	22	Ensuring Combined Heat and Power (CHP) and biomass air quality policies are met at all developments proposing to utilise CHP, including the NO <sub>x</sub> emission limits for heating plant as stated in the GLA's Sustainable Design and Construction SPG (or subsequent updated guidance).	Pollution/Sustainability	Muhammad Islam x6668 Abdul J Khan x5816	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	Reported on in Annual Status Report. KPI % of major planning applications, target – 100%	Air Quality Officer to review air quality assessments/ energy strategies to ensure compliance. A no biomass policy is already in place for the whole borough.  This policy is being included in the updated Local Plan.	GREEN	The Local Plan and the London Plan recommends a heating hierarchy that includes CHP, the fuel source is usually gas the GLA energy assessment guidance requires an air quality impact assessment to be carried out and the CHP is only allowed if there is no identified impact on air quality.  Draft new Local Plan requires any new CHP to be low NO <sub>x</sub> producers. Draft Local Plan has gone through examination and is awaiting the Examiner's report.  30 major applications reviewed to date
Development and buildings	23	Ensuring new developments have suitable energy efficiency measures installed to reduce the demand for onsite heat generation from boilers & CHP's.	Sustainability	Abdul J Khan x5816	NO <sub>2</sub> & CO <sub>2</sub>	Ongoing	Measure – All major planning applications to be reviewed to ensure sustainability policies are met	This is to be incorporated into the new Local Plan. The sustainable development team review the Energy Strategies for planning applications to ensure sustainability policies are adhered to.	GREEN	Our Local Plan requires energy use to be minimised as a priority in the design of the building and made energy efficient as possible.  Our Local Plan requires energy use to be minimised as a priority in the design of the building and made energy efficient as possible. Policy is monitored through the Local Plan.  Draft new Local Plan maintains this policy position. Draft Local Plan has gone through examination and is awaiting the Examiner's report.  Any shortfall in carbon reduction targets are met through and offset payment to the local authority
Development and buildings	24	Ensuring Air Quality Neutral policies are complied with at all developments and exceeded where possible. Ensure all larger developments (as defined by the GLA) will be air quality positive.	Pollution Team	Muhammad Islam x6668	NO <sub>2</sub> & PM	Ongoing	Reported on in the annual ASR. KPI – % of major planning applications, target – 100%	Air Quality Officer to review air quality assessments to ensure compliance of new developments with the emission benchmarks as set out in the GLA's Sustainable Design and Construction SPG (or any subsequent updated guidance).  This policy is being included in the new updated Local Plan.  The GLA's new draft Environment Strategy includes a policy for larger developments to be air quality positive and shall provide further guidance on this when the final strategy is published.	AMBER	Pollution team will provide observations when requested by Development Management for all major developments as defined in the GLA Sustainable Design and Construction SPG.  Draft new Local Plan maintains this policy position. Draft Local Plan has gone through examination and is awaiting the Examiner's report.
Development and buildings	25	Reduce the use of private cars by residents by encouraging car free developments and limiting number of parking spaces in new developments.	Development Management	Owen Whalley x5314 Matt Kent / Jack Ettlinger	NO <sub>2</sub> & PM	Ongoing	Measure – All major planning applications reviewed to ensure they meet the parking standards.	Parking standards for new developments are to be included in the new Local Plan.	GREEN	All major planning applications are reviewed against parking standards, as standard practice.  The adopted and emerging Local Plan include policies to restrict residential car parking (apart from mobility parking) the assumption is always that development should always be car free. New Local Plan is being submitted to the Secretary of State on 28 February 2018 including new car parking standards, and the examination of the new Local Plan is underway commencing on the 6th September and concluding on the 15th October. The GLA's new draft London Plan includes further reduced residential parking standards.
Development and buildings	26	Ensure the layout of new developments considers air quality impacts, for example considering the locations of buildings with different proposed uses and locating the most sensitive use units in the least polluted areas.	Pollution team/ Development Management	Muhammad Islam x6668 Owen Whalley x5314	Exposure reduction	Ongoing	Measure – All major planning applications reviewed to ensure this policy has been considered	Planning applications will be reviewed to ensure consideration of this.	GREEN	Air Quality Officer is consulted on all major planning applications, in addition a process has been established to provide monthly reports on all major planning application received and determined. There is an opportunity to engage the Air Quality Officer during the pre-application stage of projects, which should be explored between the relevant teams. The Air Quality Officer is consulted as a statutory consultee as part of the EIA Scoping process during pre-application stages, and as required regarding EIA Screening.  The Pollution Team will provide necessary comments when requested by the Development Management Service. The draft London Plan and emerging Local Plan set out more explicit policy guidance in this regard. Appropriate design and mitigation measures are considered as part of the assessment for planning applications.  New Local Plan has been submitted to the Secretary of State. It includes new policy requirement for developments to embed appropriate design and mitigation measures to respond to poor air quality.
Development and buildings	27	Ensuring adequate, appropriate, and well located green space and infrastructure including for walking and cycling, is included in new developments with the Green Grid Strategy promoted and adhered to in all major planning applications and master planning to provide low emissions routes for walking and cycling.	Development Management	Public Health Owen Whalley x5314	Exposure reduction	Ongoing	Implementation will be monitored through the rollout of the green grid strategy & the planning database.	Currently being incorporated into the new Local Plan.  The Green Grid Strategy is currently being updated.	GREEN	Green Grid Strategy has been updated and the proposed new routes embedded in the draft Local Plan, which has been submitted to the Secretary of State.  Public Health are undertaking a review across the Green Grid refreshed strategy, the bio-diversity action plan, open space strategy, air quality action plan and emerging physical activity strategy to identify opportunity to maximise green infrastructure increasing connectivity and improve health and wellbeing.
Development and buildings	28	Encourage new developments to install alternative mass waste collection systems, such as ENVAC, to reduce collection vehicle emissions.	Waste Strategy/ Development Management	Fiona Heyland x6885 Owen Whalley x5314	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	Monitored by the Waste Strategy/ Development team	Currently being incorporated into the new Local Plan.	GREEN	The evidence base is currently in development that will support the incorporation of new policies in the Local Plan that will encourage the incorporation of alternative mass collection systems in new developments as a preference to standard bin collections systems  New Local Plan has been submitted to the Secretary of State and includes a new policy requirement for major developments to incorporate high quality mass waste collection systems. The examination of the new Local Plan is underway commencing on the 6th September and concluding on the 15th October.
Development and buildings	29	Ensuring that the whole borough Smoke Control Zones is fully publicised and enforced.	Pollution Team	Muhammad Islam x6668	PM & CO <sub>2</sub>	Ongoing. Communications campaigns to be run annually in autumn / winter.	Monitor by ensuring all reports of the SCZ being breached are investigated.  Target 100% of reports	Reports of SCZ being breached are investigated as they come in and forwarded to Communications Team for publicity. To be included as part of the overall cleaner air campaign.  Publicity proposed for September at the beginning of the heating season	GREEN	Note DEFRA consultation suggests removal of SCAs and replacement with Clean Air Zones covering all pollution. Will need primary legislation No action to date
Development and buildings	30	Implement a Domestic boiler retrofit project using the GLA's RE-FIT energy efficiency retrofit programme.	Sustainability Team	Abdul J Khan x5816	NO <sub>2</sub> & CO <sub>2</sub>	Ongoing	Measure – number of boiler replacements. This will be monitored by the Sustainability Team.	This project is being carried out in partnership with Groundwork London.	GREEN	Domestic boiler replacement programme being delivered through Carbon Offsetting Finances. Project commenced December 2017.  First phase of the project complete spending a total of £200k. We are now in the process of delivering phase 2 of the project with a funding of £500k from the carbon offsetting fund. This project will run until 2021.
Development and buildings	31	Implement a Schools Carbon Emission Reduction Programme, providing funding towards boiler replacements and insulation schemes in schools.	Sustainability Team	Abdul J Khan x5816	NO <sub>2</sub> & CO <sub>2</sub>	5 boiler replacements and 4 insulation projects by end of 2017 and then ongoing project yet to be planned.	Measure – number of boilers and efficiency measures funded.  Projects will be monitored by the Sustainability Team.	This project will utilise Carbon Offset funding to reduce both CO <sub>2</sub> and NO <sub>x</sub> from building emissions.	GREEN	We have completed energy efficiency projects in 16 schools. Schools retrofit project - Energy efficiency improvements completed to 9 schools which includes boiler replacement, heating upgrades, insulation etc. The total fund for this project was £198k. Schools energy efficiency project - A project for schools which is a grant of up to £30k for energy efficiency works which 7 schools have successfully applied for and the works and works completed by Dec 2018. Total fund for this project was £210k.
Development and buildings	32	Implement a Carbon Emissions Reduction Programme for council properties including boiler replacements and insulation projects.	Sustainability Team	Abdul J Khan x5816	NO <sub>2</sub> & CO <sub>2</sub>	2018 onwards	Measure – number of boilers and efficiency measures implemented. To be monitored by the Sustainability Team	This project will utilise Carbon Offset funding to reduce both CO <sub>2</sub> and NO <sub>x</sub> from building emissions.	GREEN	Discussions on-going with the asset team regarding future project and PID to be drafted early 2018 to deliver work  £200k has been allocated for this project with a potential of another £400k over a 3 year period to be funded from the carbon offsetting fund (subject to council receiving the fund in the s106 account). for 2017/18 we achieved a 49% carbon emission reduction from a 2007 baseline and on target to achieve 60% carbon emission reduction by 2021.
Development and buildings	33	Enderby Wharf – Ensure a thorough and robust evaluation of the Environmental statement, that methodologies used comply with current guidance and that the project will not lead to any significant adverse air quality impacts in the borough.	Pollution Team/Development Management	Owen Whalley x5314 Muhammad Islam x6668	NO <sub>2</sub> & PM	Ongoing	Measure – all consultations responded to with air quality interrogated appropriately	It is noted that LBTH are not the determining authority on this application and instead only a consultee.	COMPLETED	On going working with R B Greenwich Environmental health and Planning teams to minimise pollution from this development. The mayor has engaged with the new Leader of RB Greenwich.  NB: LBTH has no influence over the delivery of the project should it move to completion Complete
Development and buildings	34	Ensure applications for new developments in neighbouring boroughs that have the potential to have impacts in Tower Hamlets are reviewed for air quality impacts and that no development will lead to any significant adverse air quality impacts in the borough.	Pollution Team/ Development Management	Owen Whalley x5314 Muhammad Islam x6668	NO <sub>2</sub> & PM	Ongoing & September 2017 for inclusion of new parking policies in the new Local Plan	Measure – All consultations received from neighbouring boroughs assessed for air quality impacts	The Air Quality Officer will review the Air Quality Assessments for applications that we are designated as a consultee	GREEN	Relevant applications in neighbouring boroughs (& LLDC planning area) reviewed and appropriate comments made. EIA Officer provides comments as part of the Planning Observations, and AQ officer is consulted.  To set up formal recording system from April 2018. Planning have enquiries on what is required for this and how these can be achieved. Ongoing
Development and buildings	35	Lead by example by ensuring the councils new Civic Centre is a best practice example of a sustainable and low emissions development in regards to air pollution and CO <sub>2</sub> with both air quality neutral and carbon zero policies being met.	Corporate Property and Capital Delivery/ Development Management/ Sustainability/ Pollution Team	Jane Abraham Ann Sutcliffe x4247 Mark Balgent x7522 Abdul J Khan x5816 Muhammad Islam x6668	NO <sub>2</sub> & CO <sub>2</sub>	Building due for completion in 2021, planning process 2017-2018.	Measure – development to be delivered to meet or exceed all sustainability and air quality standards including BREEAM	Corporate Property and Capital Delivery team are leading on the planning application, the relevant teams will be consulted to ensure sustainability/air quality targets are met.	GREEN	Planning Permission for the civic centre has been granted as of 8th May 2018, and the air quality assessment and energy efficiency unit were consulted as part of the planning application. Building due to be occupied 2021.  The strategy for the project will achieve: -Circa 3,500sqm of open space provision/public realm - Provide over 300 staff and visitor cycle parking to the site - Achieve BREEAM excellent rating - Provide renewable energy measures such as air source heat pumps and PV within design - Includes waste recycling facilities - Includes rainwater/greywater recycling facilities - Provision of brown roof - Achieving 84.3% over the baseline for the whole development in carbon reduction, meeting the LBTH policy target.

Development and buildings	36	Improve the energy efficiency of John Onslow House as part of the upcoming refurbishment with the aim of becoming carbon zero and any new boilers to be ultra-low NOx.	Facilities / Sustainability	Sam Brown Abdul J Khan x5816	NO2 & CO2	Due for completion by 2021	Measure – development to be delivered to exceed all sustainability and air quality standards. Monitoring of this will be done throughout the planning & implementation process.	All Boiler Works are complete as informed and noted.	COMPLETED	The sustainability team is currently looking at installing solar PV on JCH roofs and the idea store next door.	New Remeha Quinta Pro and Vaillant Ecotec boilers installed.  • Remeha, Low Class 5 NOx emissions levels from 29mg/KWh (0% O2, dry) - Low pollutant emissions meet environmental regulations including BRESAM • Vaillant, Fully modulating low NOx burner to achieve lower NOx emissions. NOx class 5 from 36mg/KWh (0% O2, dry)  Work done - close
Development and buildings	37	Ensure developments that will increase river traffic, in the operational phase of development, are thoroughly assessed for potential air quality impacts and will not have a significant negative impact on air quality.	Pollution Team	Muhammad Islam x6668	NO <sub>x</sub> & PM	Ongoing	Measure – all relevant development assessed for air quality impacts.		GREEN	Planning applications are reviewed and assessed as an ongoing process.	Planning applications which have an impact on air pollution on the River will be reviewed. None noted to date.
Major Infrastructure Projects	38	Ensure the Tideway Tunnel infrastructure project is sustainably delivered with the Construction Code of Practice adhered to and effective emissions mitigation in place during construction & operational phases.	Pollution Team/ Planning	Muhammad Islam x6668 Owen Whalley x5314	NO <sub>x</sub> & PM	Project due for completion in 2021.	Monitoring done throughout project by Thames Tideway with reports provided to LBTH as requested		GREEN		This duplicates actions 21 to 24 Ongoing LBTH attend forum meetings and the CCP is in place and is being monitored.
Major Infrastructure Projects	39	Silvertown Tunnel – Ensure a thorough and robust evaluation of the Environmental statement, that methodologies used comply with current guidance and that the project, during both the construction and operational phases, will not lead to any significant adverse air quality impacts in the borough and that adequate mitigation is provided for any potential impacts. Ensure traffic modelling on which the air quality statements are robust.	Pollution Team/ Strategic Transport	Muhammad Islam x6668 Owen Whalley x5314	NO <sub>x</sub> & PM	Public examination closing 11 <sup>th</sup> April 2017. Decision expected in 2017.	Measure – all consultation stages thoroughly reviewed for potential air quality impacts and robustness of traffic data on which the air quality assessments are based.	LBTH has attended the Environmental Issue Specific Hearing and raised concerns regarding the mitigation trigger levels	GREEN		LBTH was represented at the Development Consent Order Panel meetings and made representations on a number of matters including air quality. The assessment on air quality findings has been delayed for a further assessment on air quality. An announcement is not now expected until May 2016.  Consent for the new tunnel has now been granted. We may need to keep a watching brief to see whether the reductions in traffic through the Blackwall Tunnel promised are delivered and whether traffic overall in the SE corner of the borough increases as a result of the additional traffic through Silvertown Tunnel Consent granted Awaiting contact from TL on construction phase Jack Ettinger, Highways, leads
Major Infrastructure Project	40	Ensure that all future major infrastructure projects are adequately reviewed and assessed through the planning process to ensure impacts on air quality are minimised.	Pollution/Development Management	Owen Whalley x5314 Muhammad Islam x6668	NO <sub>x</sub> & PM	Ongoing	Target - 100% infrastructure projects reviewed and assessed.	Guidance on this is to be included in the new Local Plan	GREEN		No new infrastructure projects other than these specifically assessed in the action plan received. LBTH are engaging with TfL regarding the Rotherhithe to Canary Wharf Pedestrian Bridge, and EIA Scoping Opinion is due to be sought late 2018/early 2019 which LBTH will be consulted on, the project is anticipated to result in air quality benefits. Nick Marks has been involved in some discussions, with the next environment meeting scheduled for 18th October.  Major infrastructure projects have historically been governed by acts of parliament and more recently by the development consent order process. These procedures are separate from the normal planning application process. Air quality is however, included in the requirements for the consideration of environmental impacts of such projects.  Did the council consider being involved with the examination of Tilbury2 (although it's too late to be involved now as PINS has delivered their recommendation to SoS)? What about the potential for an increase in river traffic from Riverside Energy Park (this application has been submitted)? Although this project is quite far downstream this is likely to affect river traffic. Detailed work has started to identify most effective procurement routes, to confirm future vehicle requirements, electric vehicles and low emission specifications A new schedule for inclusion in the invitation to Tender has been developed. The schedule is with legal services for development of appropriate term and conditions of contracts.
Delivery servicing and freight	41	Continue to ensure that Procurement policies to include a requirement for suppliers with large fleets to have attained, silver as a minimum or gold as a preference, Fleet Operator Recognition Scheme (FORS) accreditation, or equivalent.	Procurement team	Zamil Ahmed x4385 / Richard Williams x6847	NO <sub>x</sub> , PM & CO <sub>2</sub>	Ongoing	Measure – actions implemented in policies		GREEN		Fleet replacement will be in line with procurement policies, with focus on meeting clean air requirements and mayoral pledges to phase out all diesel vehicles from the council's fleet. Detailed work has started to identify most effective procurement routes, to confirm future vehicle requirements, electric vehicles and low emission specifications A new schedule for inclusion in the invitation to Tender has been developed. The schedule is with legal services for development of appropriate term and conditions of contracts.  Additionally, the Fleet procurement will include the FORS requirements in our vehicles.
Delivery servicing and freight	42	Investigate updating Procurement policies to ensure sustainable logistical measures are implemented (and include requirements for preferentially scoring bidders based on their sustainability criteria).	Procurement Team	Zamil Ahmed x4385	NO <sub>x</sub> , PM & CO <sub>2</sub>	Policies updated by 2019	Measure – actions implemented in policies		GREEN		Current Sustainable Procurement Policy and Supply Chain Ethical Code of Conduct is being reviewed and will incorporate all the key elements of the AQPB. This policy will act as the overarching framework for all existing sustainable and ethical procurement practices.  sustainable quality questions are included in appropriate procurements.
Delivery servicing and freight	43	Investigate re-organisation of freight to support consolidation (or micro-consolidation) of deliveries, by setting up or participating in new logistics facilities, and/or requiring that council suppliers participate in these.	Development Management/ Engineering Team	Richard Williams	NO <sub>x</sub> , PM & CO <sub>2</sub>	Mar-19	Implementation of freight consolidation scheme.	Target area for freight consolidation is the Isle of Dogs, the GLA lead on the South Poplar and Isle of Dogs Opportunity Area Framework which includes priority to deliver freight consolidation centres which is being managed by TfL	GREEN		A constructors' forum has been established and officers already require construction management plans for major development and are additionally exploring Construction Logistic Plans and Community Safety (CLOS) systems to manage construction traffic and reduce pedestrian and cycling safety. The constructors' forum is currently for internal LBTH officers but will be expanded to include developers in areas experiencing high levels of construction. Initial estimate to join EcoStars for a two year participation is in the region of £40,000. There is no identified funding for this scheme at the moment.  The Isle of Dogs and South Poplar Opportunity Area Framework has been delayed by the GLA but is due for consultation shortly
Delivery servicing and freight	44	Investigate implementing a local Eco Stars Fleet Recognition Scheme for Tower Hamlets.	Pollution Team	Muhammad Islam x6668	NO <sub>x</sub> , PM & CO <sub>2</sub>	Mar-19	Measure – no of scheme members	<a href="http://www.ecostars-uk.com/">http://www.ecostars-uk.com/</a>	GREEN		Initial estimate to join EcoStars for a two year participation is in the region of £40,000. There is no identified funding for this scheme at the moment.  Without a suitable funding stream to consider removal from air quality action plan. No progress due to current lack of funds
Borough fleet/ council contracted fleet actions	45	Join a recognised appropriate driver award scheme, e.g. Fleet Operator Recognition Scheme (FORS) or Van Excellence & achieve certification.	Development, Compliance and Commissioning Department – Fleet management team.	Richard Williams	NO <sub>x</sub> , PM & CO <sub>2</sub>	Achieve bronze certification by May 2019	KPI – certification awarded.	<a href="http://www.vanexcellence.co.uk/">http://www.vanexcellence.co.uk/</a> <a href="https://www.fors-online.org.uk/cms/">https://www.fors-online.org.uk/cms/</a>	AMBER		Working towards FORS bronze accreditation. The capital requirement of £5million for new fleet is subject to cabinet approval in Feb 2019. Detailed project work has started to achieve FORS bronze accreditation in April 2019.  Ultimate aspiration is to Achieve FORS Gold
Borough fleet/ council contracted fleet actions	46	Increasing the number of, electric, hybrid, and cleaner vehicles in the boroughs' fleet.	Development, Compliance and Commissioning Department – Fleet management team.	Richard Williams	NO <sub>x</sub> , PM & CO <sub>2</sub>	Replacement fleet requirements agreed by April 2019	Monitoring of the fleet profile & records. KPI – No of ULEV's in borough fleet		AMBER		Detailed work to identify future requirements started in November 2018, with plans to confirm customer requirements and replacement options agreed by April 2019.  Capital bid of £6 million waiting approval at Feb 2019 Cabinet. In meantime Fleet are working with Energy Savings Trust to identify specification and procurement route for most suitable electric and low emission replacement vehicles. Plans are underway to bring in demo vehicles in Jan - Feb 2019.
Borough fleet/ Council contracted fleet actions	47	Accelerate uptake of new Euro VI vehicles in borough fleet, ending the purchase of diesel vehicles where feasible.	Development, Compliance and Commissioning Department – Fleet management team.	Richard Williams	NO <sub>x</sub> & PM	Total fleet upgrade to meet ULEZ Standards in time for ULEZ implementation	Monitoring of the fleet profile & records. KPI - % of ULEZ compliant vehicles in fleet.	Future vehicle requirements and specifications to be finalised by April 2019. Priority is being given to agree refuse, recycling and cleansing fleet requirements by end of February 2019, with remaining fleet requirements confirmed by April 2019.	AMBER		Detailed work to identify future requirements has started in November 2018, with plans to confirm customer requirements and replacement options agreed by April 2019.  Capital bid of £6 million waiting approval at Feb 2019 Cabinet. In meantime Fleet are working with Energy Savings Trust to identify specification and procurement route for most suitable electric and low emission replacement vehicles. Plans are underway to bring in demo vehicles in Jan - Feb 2019.
Borough fleet/council contracted fleet actions	48	Real-time Telematics monitoring of fleet driver behaviour and subsequent driver training	Development, Compliance and Commissioning Department – Fleet management team.	Richard Williams	NO <sub>x</sub> , PM & CO <sub>2</sub>	Phase 1 – Jan 2017, first 75 vehicles; Phase 2 – Jan 18, next 75 vehicles; Phase 3 – 2019, all others.	Number/ % of vehicles fitted with telekinetic monitoring. Number/% of drivers received training		AMBER		Vehicle tracking and driver behaviour monitoring systems are planned for installation into all replacement fleet. Procurement of fleet tracking system has been completed, with roll out plans being developed.
Borough fleet/council contracted fleet actions	49	Utilise round optimisation for council fleet to reduce vehicle miles.	Compliance and Commissioning Department – Fleet management Team.	Richard Williams	NO <sub>x</sub> , PM & CO <sub>2</sub>	Mar-19	Fleet manager to monitor progress	Route optimisation solutions are being investigated as part of Passenger Transport review, in combination with use of vehicle tracking.	AMBER		A review of fleet usage forms part of vehicle replacement plans, working with all council departments and services to rationalise vehicle movements and minimise the number of Council owned vehicles. This will include options for route optimisation where necessary.
Borough fleet/council contracted fleet actions	50	Procure a cargo bike for regular delivery of literature to councillors.	Travel Plan / Engineering Team	Margaret Cooper x6851	NO <sub>x</sub> , PM & CO <sub>2</sub>	To be purchased and in use by December 2017	Monitoring will be carried out on how often the bike is used instead of a car. KPI - % of deliveries made by the bike. 100% target.		AMBER	Awaiting confirmation from FM that arrangements will be made for the bike to be used.	Parks Dept already have 2 cargo bikes in use in Victoria Park. Require FM to confirm the bike will be used and post drivers trained to cycle. Update Feb 12 2018 - No further progress as no confirmation from FM that bikes can be used.
Borough fleet /council contracted fleet actions	51	Project 2020: use the procurement process to ensure all waste & Recycling collection vehicles in the new contract are as low emission as possible by prioritising tenders with the highest proportion of low emission vehicles.	Waste Strategy	Fiona Heyland x6838	NO <sub>x</sub> , PM & CO <sub>2</sub>	New collection contract commences in 2020	This will be monitored through the contract management.		GREEN	Waste management services will be delivered in house from April 2020. This action will now feature as part of the service mobilisation plan	The draft Waste Management Strategy has been subject to public consultation and policies and service standards will be developed and finalised to support the adoption of the Strategy in 2019. On 31st October 2018 Cabinet agreed the recommendation to bring the waste services in house from April 2020. This action will be incorporated into the services mobilisation plan
Borough fleet/council contracted fleet actions	52	Project 2020: utilise round optimisation to reduce vehicle mileage for waste collections.	Waste Strategy	Fiona Heyland x6838	NO <sub>x</sub> , PM & CO <sub>2</sub>	New collection contract commences 2020	Target - All rounds reviewed and amended where necessary.		GREEN	Waste management services will be delivered in house from April 2020. This action will now feature as part of the service mobilisation plan	The draft Waste Management Strategy has been subject to public consultation and policies and service standards will be developed and finalised to support the adoption of the Strategy in 2019. On 31st October 2018 Cabinet agreed the recommendation to bring the waste services in house from April 2020. This action will be incorporated into the services mobilisation plan
Borough fleet/council contracted fleet actions	53	Reduce 'Grey Fleet' impacts by reviewing staff parking permits to reduce number or allocate shared team permits rather than individual.	Parking/fleet management team	Richard Williams / Stephen Willie x6879	NO <sub>x</sub> , PM & CO <sub>2</sub>	Mar-19	Measure – % of staff permit reduction				Staff travel plan is to be reviewed in 2018
Localised solutions	54	Investigate installing Green Infrastructure, such as green walls, green screens or living roofs at schools/residential developments in polluted areas. Linking in with the Green Grid and Open Spaces Strategy.	Pollution Team	Muhammad Islam x6668		Project still to be scoped	Project still needs to be scoped	Project has not been scoped yet and is funding dependent. Will be taken forward when the new air quality officer joins. Could tie in with the GLA's air quality audits & do greening at the schools.	GREEN		Project has not been scoped yet and is funding dependent. Will be taken forward when the new air quality officer joins. Could tie in with the GLA's air quality audits & do greening at the schools.  New green walls to be installed at St Lukes and Olga schools and beside the A12 following successful bids to the Mayor's AQ fund. Installation of Green walls is being considered by Bonner and Marners Schools as part of the GLA school audit
Localised solutions	55	Low Emission Neighbourhoods (LENs) – implement the City Fringe LEN in partnership with Hackney and Islington.	Pollution Team / Engineering	Muhammad Islam x6668 Margaret Cooper x6851	NO <sub>x</sub> , PM & CO <sub>2</sub>	Project completed by end of year 2020.	Project has not been scoped yet and is funding dependent. Will be taken forward when the new air quality officer joins. Could tie in with the GLA's air quality audits & do greening at the schools.	Promotional work encouraging businesses in LEN to take up corporate membership of the Santander Cycle Hire Scheme has been effective in increasing usage to the extent that it is shortlisted for a London Transport Award for Innovation in March. ULEZ signage being agreed with TfL for delivery by Dec 2018 and Go Live April 2019 - covers part of LEN area in LBTH	GREEN		Promotional work encouraging businesses in LEN to take up corporate membership of the Santander Cycle Hire Scheme has been effective in increasing usage to the extent that it is shortlisted for a London Transport Award for Innovation in March. This project is scheduled for delivery by 2020.  ULEZ signage being agreed with TfL for delivery by Dec 2018 and Go Live April 2019 - covers part of LEN area in LBTH

Localised solutions	56	Engagement with businesses – Continuation of the ZEN Project engaging businesses with advice and grants to enable them to reduce their air quality impact.	ZEN Project Officer	Helen McGleade (helen.mcgleade@hackney.gov.uk) 0208 356 2166 07598 695207	NO <sub>2</sub> , PM & CO <sub>2</sub> , Awareness raising.	2nd phase 2 April 16 – March 19	ZEN officer to monitor KPI – no of businesses engaged with & no of pollution reducing measures implemented.	397 ZEN business members 30 business grants 205 household members  www.zeroemissionsnetwork.com	GREEN	307 ZEN business members 30 business grants. Currently processing 9 grant applications 205 household members Comms website https://zeroemissionsnetwork.com/ Twitter feed: @CleanerAirInHackney (1893 followers) LinkedIn: etulletins; Instagram (222 followers) Various pop up events ZEN cycle hire workplace scheme, 88 cycle hire codes were provided to ZEN workplaces in Tower Hamlets and in the first 9 months of operation a total of 6216 journeys were made using the codes. ZEN cycle hire – resident scheme, 111 cycle hire codes at 50% off annual membership provided to ZEN residents (73 LBTH residents) Helen making good progress with scheme.
Cleaner Transport	57	Enforce anti-idling regulations by becoming a designated authority to issue Fixed Penalty Notices to idling drivers. Anti – idling engagement project focusing on air pollution hotspots and high risk locations such as hospitals and schools.	Pollution Team/ Enforcement Officers	Muhammad Islam x6668	NO <sub>2</sub> , PM & CO <sub>2</sub> , Awareness raising also.	Spring 2018 to become designated authority and instigate project then ongoing.	Measure – number of FPNs issued per year. Monitoring the number of people engaged & social media reach. Target to run 6 idling action days per year.	Enforcement officers will be trained on this and delegated authority to enable them to issue FPN's.	GREEN	Action to establish designated authority status is scheduled for spring 2018. Discussions have been had with Camden Council which introduced the scheme most recently on how the implementation process. Legal advice has been sought which confirms this is a key decision and as such will require approval from the Mayor in Cabinet. The next step is to prepare a Cabinet report.  FPN books in order, implementation following publicity campaign Anti-idling legislation adopted - THEOs to lead on enforcement We have run 3 anti-idling events - 2 schools and Watney Market 2 more to do  GLA Mayor's AQ fund seeks to continue a pan London anti-idling scheme. LBTH will join the scheme if organised.
Cleaner transport	58	Increasing the proportion of electric, hydrogen and ultra-low emission vehicles in Car Clubs.	Parking Services	Margaret Cooper x6851 Anita Haylock x5029	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	KPI – % of vehicles provided by car club that are ULEV's		GREEN	75%  The Council has entered in to discussion with both the DriveNow and ZipCar companies to consider implementing their scheme in the near future. Both DriveNow and ZipCar Flex use ultra-low emission vehicles.
Cleaner transport	59	Review parking permit fee banding to encourage lower emission vehicle choice or add an additional diesel surcharge to existing permit fees.	Parking Services	Anita Haylock x5029 Steve Prince x5775	NO <sub>2</sub>	Ongoing	Measure – parking fees reviewed and amended	Should be preceded by an education & awareness campaign	GREEN	50%  Emission bands already exist for CO2 emissions as part of the permit pricing structure. Consideration of diesel vehicles will be discussed as part of the Strategic Parking & Mobility Plan with elected Members however, plans are already being put in place to add diesel charging to the Fees & Charges for 2019-20.
Cleaner transport	60	Installation of residential electric charge points.	Engineering	Margaret Cooper x6851	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	Measure – no of charge points installed, target 150 by 2025.	Electric Vehicle Charge Point Strategy has targets of minimum of 150 on street charge points by 2025, with an aspirational target of 300 (including rapid chargers which has now been adopted by Council as the core target.	GREEN	12 street lighting charge points now installed as of end of August 2018. Installation of 36 fast charge points started implementation 26/11/18 - 13/12/18;
Cleaner transport	61	Installation of rapid chargers to help enable the take up of electric taxis, cabs and commercial vehicles (in partnership with TfL and/or OLEV)	Engineering / Pollution	Margaret Cooper x6851 Muhammad Islam x6668	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	Measure – no of rapid chargers installed	Locations needed for installation. Existing and new taxi ranks to be prioritised	GREEN	Site feasibility studies in progress for 23 fast charging points Final site feasibility plans awaited for the 6 sites for rapid chargers  Legal agreements with suppliers for rapid chargers drafted and ready for signoff; site feasibility studies in progress for 6 rapid charger sites which TfL wish to deliver in 2018/19 in LBTH.
Cleaner transport	62	Continue to provide/ensure provisions of infrastructure to support walking and cycling including on street residential secure parking lockers, cycle routes, cycle permeability schemes, traffic management area reviews.	Engineering / Planning	Margaret Cooper x6851	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	To be monitored by the engineering team and progress reported in annual summary reports.	This is to be included in the new Local Plan.  The Cycling and Walking Plans are to be updated to account for the new Healthy Streets Guidance.  The Council is committed to providing more cycle lanes and improving existing routes and may be off-road, on quiet back streets or on busier roads. This will be informed by the proposals emanating from TfL's Strategic Cycling Analysis including a new route along Cambridge Heath Road.	GREEN	58 new cycle parking spaces installed to date in 2017/18.  25 bike hangers being procured; 25 individual cycle stands on order too - for 2018 installation. Feasibility study for 100 space Cycle Hub secure building being prepared for planning application to modify Crossrail provision. Consultation and assessment process for residential hangers has been speeded up. Outline designs for strategic cycle route Hackney to Greenwich have been developed and are now being modelled by TfL prior to public consultation May 2019. Also 4 Central London Grid extension routes being designed in liaison with TfL for implementation 2019/20 onwards.
Cleaner Transport	63	Reduce traffic in the borough through the development of a new Local Implementation Plan in line with the Mayors Transport Strategy.	Engineering	Margaret Cooper x6851	NO <sub>2</sub> , PM & CO <sub>2</sub>	New LIP to be developed by October 2018 and ongoing implementation.	The implementation on the new LIP will be monitored by the Engineering department	We will be adopting the Healthy Streets approach to design of all corridor schemes as per the MoL's Healthy Streets Plan.  A Road Traffic Reduction Plan will be included as part of the new LIP.	GREEN	Adopted and ongoing - Healthy Street assessment included in 6 design studies  LIP's Consultation Draft submitted to TfL for comment along with Annual Spending Submission 2019/20 and a Liveable Neighbourhood Bid for Bow. Programme for 20 Low Traffic Neighbourhoods agreed at Public Realm Working Group for delivery in phased plan by 2022
Cleaner Transport	64	Investigate re-prioritisation of road space to smooth traffic flow, reduce congestion, improve bus journey times, cycling and pedestrian experience, and reduce emissions caused by congested traffic.	Staff Travel Plan, Engineering Team	Robert Morton x6490 Margaret Cooper x6851	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	Measure – no of Dr Bike sessions run each year & no of cycle hire trips	Following the successful introduction of cycle hire scheme for staff, it has been expanded from 20 up to 35 fob keys. Usage figures are collated every month with over 400 trips made on average per month. Dr Bike sessions are held on Cycle Superhighway 3 every month	GREEN	Staff Travel Plan update to be drafted over next 3 months (by end Jan) with draft Parking Policy included as now advised.
Lobbying and Partnership	65	Push for Tower Hamlets to be included in the ULEZ through partaking in the TfL Consultation process.	Pollution Team/ Place DMT	Muhammad Islam x6668 Ann Sutcliffe x4247	NO <sub>2</sub> & PM	3 <sup>rd</sup> consultation due in Autumn 2017	Measure – all consultations responded to with a cross department response by the due date.	A cross departmental response will be provided considering the impacts of the proposals on residents and businesses in the borough	COMPLETED	Pollution Team have provided comments on the latest consultation for ULEZ expansion  Pollution Team have provided comments on the latest consultation for ULEZ expansion to be incorporated in common response. Separate comments made to London Council's consultation  ULEZ now settled TfL/GLA policy - delete? LBTH in ULEZ, to be included Oct 2020 Complete
Lobbying and Partnership	66	Ensure responses to all government and regional consultations focus on reducing or eliminating emissions of Local air pollutants and CO <sub>2</sub> .	Pollution Team/ Sustainability/ Development Management	Muhammad Islam x6668 Abdul J Khan x5816 Owen Whalley x5314	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing	Measure – all consultations to assert councils position on emissions reductions.	We respond to all consultations highlight the needs for low carbon energy efficient of systems and the boroughs aspirations and ambitions are included.	GREEN	Recently commented on the LBTH local plan, site of Dogs Neighbourhood Plan, DEFRA consultation on domestic solid fuel burning, TfL ULEZ proposals, and the draft London Plan. Ongoing
Lobbying and Partnership	67	Lobby and work with TfL to reduce emissions from buses in the borough. e.g. through green bus corridors. Work with other statutory Services to reduce emissions – LFB, NHS etc.	Engineering / Pollution Team	Margaret Cooper x6851 Muhammad Islam x6668	NO <sub>2</sub> & PM	Ongoing	Measure – no of routes that convert to Low emission/ hybrid technology.	TfL Project – LBTH have assisted	GREEN	A11 has been designated part of the Ultra Low Emissions Bus Zone and LBTH are liaising with TfL on delivery of works to improve bus reliability and reduce queuing. Update Feb 12 2018: No further info from TfL as yet but funding for delivery is protected in the TfL Business Plan. Central London ULEZ signs to be installed on boundary roads by TfL starting 29/11/18.
Lobbying and Partnership	68	Lobby and work with TfL to reduce emissions from TfL controlled roads e.g. through re-prioritisation of road space.	Pollution Team / Engineering	Muhammad Islam x6668 Margaret Cooper x6851	NO <sub>2</sub> & PM	Ongoing	Monitored through attendance of meetings and meeting minutes		RED	Update Feb 2018: Lead Members being briefed about the conflicts of this action with the overall desired results. NO ACTION TO BE PURSUED UNTIL THE ACTION IS REVISITED. The target as currently expressed could conflict with aspirations for improvement of local neighbourhoods (i.e. by diverting traffic from trunk roads to local roads). This action will be reviewed to ensure that lobbying is focussed on appropriate actions and outcomes in relation to road space allocation and design  Lead Members briefed on the conflict with policies – this could worsen environmental quality on local roads
Lobbying and Partnership	69	Lobby the GLA to strengthen their Air Quality Neutral Policy and lower the CHP emission limits in current guidance.	Pollution Team	Muhammad Islam x6668	NO <sub>2</sub> & PM	Ongoing	Measure – all consultations responded to with a cross department response by the due date.	This can be done through a response to the upcoming consultation on the Mayor of London's new Environment Strategy and/ or new London Plan.	GREEN	New Draft Environment Strategy and Draft London Plan seeks to have largest developments required to be air quality positive. Further guidance awaited from the GLA following adoption of the new London Plan. New draft London Plan includes enhanced requirements for AQ positive for the largest dev's.
Lobbying and Partnership	70	The development of a Mayors Air Quality fund within Tower Hamlets.	Pollution Team	Muhammad Islam x6668	NO <sub>2</sub> & PM	2017/18 budget review.	Spending to be monitored by budget holder.		GREEN	A growth bid has been successful and a report is going forward to the grants determination sub-committee  AQ fund now set up First bids received. 8 applications have been approved. Further tranche of money to be released for bids in November.
Lobbying and Partnership	71	The Mayor of Tower Hamlets to hold a meeting with The Royal Borough of Greenwich and Greater London Authority to discuss reducing the environmental impact of the proposed Enderby Wharf cruise terminal. Lobby for shore-side power to be provided for the ships.	Mayor's Office	David Courcoux x4476	NO <sub>2</sub> , PM & CO <sub>2</sub>	By end of year 2017	Monitored by Mayor's office		COMPLETED	Meeting held. Liaison between officers of LBTH & RBG to control pollution. Shore side power not feasible.  Discussions held. No further action possible - delete? Meeting held - no further action
Lobbying and Partnership	72	Work with the Canal & Rivers Trust, the GLA and other Boroughs with canals to devise a plan to best tackle issues with emissions from canal boats. Enforcement action to be taken where necessary.	Pollution team	Muhammad Islam x6668	NO <sub>2</sub> , PM & CO <sub>2</sub>	Discussions are ongoing	Monitored via progress meetings	Canal and River Trust have jurisdiction over the canals	GREEN	Discussions are ongoing  Tower Hamlets Better Boating Guide to be given out to canal boats on a regular basis.  Liaison with CRT. Meetings being set up Meeting with CRT held to develop joint strategy with other London Boroughs
Lobbying and Partnership	73	Support the Port London Authority in the development and implementation of their Air Quality Strategy for the River Thames.	Pollution team	Muhammad Islam x6668	NO <sub>2</sub> , PM & CO <sub>2</sub>	Strategy due to be published by end of year 2017	Measure – attendance at meetings and consultation feedback completed	See for further info: https://www.pla.co.uk/Environment/Air-Quality-and-Green-Tariff/Air-Quality	COMPLETED	The Mayor has also raised the issue of Enderby Wharf with the Mayor of London's office and highlighted the problems caused by the fact the current statute means the Mayor of London has no jurisdiction to take action on air quality matters related to activity on the River Thames. He suggested lobbying for a change to this to give the Mayor of London oversight of air quality emissions produced on the Thames. The consultation strategy was published in early December, consultation feedback to be provided. PLA Representative will update  PLA has produced strategy Completed
Lobbying and Partnership	74	Support the GLA in Lobbying national Government to provide new powers and improved coordination for river and maritime vessels, including having a single regulatory authority for the Thames and London tributaries and introduce minimum emissions standards	Pollution Team	Muhammad Islam x6668	NO <sub>2</sub> , PM & CO <sub>2</sub>	Ongoing		This proposal is included in the Mayor of London's draft Environment Strategy 2017.	COMPLETED	This is ongoing as necessary  Presentation by PLA to next air quality board on their new environment strategy.  Liaison with PLA Representative specifically on the production of guidance for developers and boroughs in 2018, as well as proposals for funds improving emissions from the marine sources within the borough. Attendance to the future workshops on the progress for the strategy.  Maritime emissions addressed in latest DEFRA consultation - delete? New London Plan has aspirations for the control of marine pollution

## **Appendix 5 - Air Quality and School Projects**

There are a number of stakeholders within the Council involved in the delivery of air quality projects relating to schools.

Several action points in the Council's air quality action plan relates specifically to schools:

### **Action point 7- TfL Sustainable Travel Active Responsible Safer (STARS)**

This action is to encourage schools to join the TfL (STARS) programme.

### **Action point 8 – Air quality at schools**

Bonner Primary (Mile End site) – a 6 week citizen science programme was delivered. The project worked with Year 5 class of schoolchildren to educate, inform catalyse conversations about air quality. The aim of the programme was to embed long-term, durable behaviour change in participants. This included increased walking and active travel, understanding and using clean air routes, and encouraging less car use, particularly for short journeys. In addition to the in-school academic programme, the project also focused on involving families, the local community and local businesses to engage with the programme, which culminated in a Town Hall-style presentation event at The Centre, Mile End in June 2018. At the Town Hall meeting, students from both Bonner Primary Schools enthusiastically presented their learnings in a variety of media. There was a captive audience of 200 people, representing a wide range of the Mile End and Tower Hamlets community.

### **Action point 9 – GLA school audits**

Two primary schools, Bonner and Marner audited in 2017/18 and two nursery, Columbia & Alice Model audited 2018/19. Funded by the GLA with Officer time provided by officers from the Pollution Team. £10,000 made available by the GLA to the schools following the first audits for implementation of the recommendations. Marner has taken up funding from the GLA and proposes to install a green wall. Bonner has been offered assistance in taking up GLA funding both from the GLA and officers of the Pollution Team. It is understood the school hasn't taken up the offer. Reports following the nursery schools audits haven't been published yet.

### **Action point 10- schools anti-idling project**

Engagement with schools and installation of anti-idling signage at school parking areas in high pollution areas. A total of 5 anti-idling events delivered in 2018/19 at Bonner, English Martyrs, St Lukes, Globe and Mayflower schools. This Project is funded by GLA and delivered in partnership with Greengumption. The focus is on engagement and awareness raising. Officers from the Environmental Health & Trading standards service have hand delivered anti-idling signs schools to 22 schools.

### **Action point 11- Schools Environmental Theatre**

20 air pollution workshops at various schools across the borough to teach children how their travel choices affect air quality. Schools included:

St Elizabeth Catholic Primary School  
Virginia Primary School

Osmani Primary School  
 Marner Primary School  
 Bonner Primary School x 2 sites  
 Clara Grant Primary School  
 St Peter's London Docks Primary  
 Hague Primary x 2  
 Kobi Nazrul Primary School  
 William Davis Primary School  
 St Saviour's Primary School  
 Hermitage Primary School  
 Manorfield Primary School x 2  
 Mayflower Primary School  
 Olga Primary School x 2  
 Woolmore Primary School

Action points 8 and 10 were funded by Environmental Health & Trading Standards.

There are other projects that are not in the Council's AQAP but these projects involve working with a local school/s and have a positive beneficial air quality effect. These are listed below.

**C40 cities project.** A GLA funded project undertaking hyperlocal air quality monitoring using low cost sensor, AQ meshes. Monitoring is being carried out at several schools in Tower Hamlets. Environmental Health & Trading Standards facilitated the schools.

Site Name	Location	Duration
Oaklands Secondary School	Old Bethnal Green Rd, London	12 months
Bonner Primary School	Stainsbury St, London E2 0NF	3 months
Marner Primary School	Devas St, Bow, London E3 3LL	3 months
Alice Model Nursery School	14 Beaumont Grove, London E1 4NQ	3 months
Columbia Market Nursery School	London, E2 7PG	3 months
Rachel Keeling Nursery School	Bullards Place, London E2 0PS	3 months

#### **Tower Hamlets Mayor's Air Quality Fund**

**First Round:** Olga and St Luke's primary schools given funding to install green screens.

**Second Round:** School linked projects with formal approval for award

- Citizens UK. Aims to work with Churches, Mosques, primary/secondary schools and Queen Mary University.
- Clean Air for Kids. Chisenhale School, Old Ford School, Malmesbury School and Olga School.
- Tower Hamlets Secondary School Pollution Awareness & Community Market Outreach days.
- Air-Mazing Schools Whitechapel.
- Clean air border planting Shapla Primary School
- Multi Model School project – St Paul's Way Foundation Primary School.
- Planting Healthy Air in Schools Woolmore Primary. Confirmation from school being sought.

- Air eQuality Mulberry School for Girls & Bow Nursery.

**Schools Streets** – A report on this was produced for the AQP meeting on 5/3/19 (attached).

**Bike it Plus Tower Hamlets**- A project funded by the Council and delivered by Sustrans. Refer to flyer for more details about the project.





# Bike It Plus Tower Hamlets

Bike It Plus works closely with schools to reduce car trips by promoting active travel, with a focus on Air Quality. We make it easier for school communities to travel actively by providing them with the support and encouragement needed to create real behaviour change. This is done using the key phases of engagement shown below.

In Tower Hamlets the project is funded by Jack Ettinger from Development, Public Realm at Tower Hamlets Council. In the academic year 2018-9, the project is funded part time at the cost of £35,000. In the previous academic year the project was match funded by TFL giving Tower Hamlets a full time officer.

Academic year 2018-9 Bike It Plus is working with four new schools (Bygrove, Landbury Lawrence, Mamer and Woolmoore primary) and continuing to support four schools (Culloden, Mayflower, Stebon and St Saviour Primary School) who engaged in the project last academic year.

<p><b>Awareness</b> Building awareness of the project in the new schools that we work in and creating conditions to nurture success.</p> <p>Launch Assemblies; Pupil and Parent Focus Groups; Car Free Days; Set up Bike It Crews</p>		<p><b>Empowerment</b> Providing the tools to make positive changes to travel behaviour and breaking down barriers to active travel.</p> <p>Dr Bike; Cycle and Scooter Skills; Clean Air Routes to School; Parental Engagement</p>	
	<p><b>Action</b> Helping the school community to make changes to their travel behaviour.</p> <p>Bike Clubs; Walking Zone Competitions; Incentive Schemes e.g. Healthy Travel Cards</p>		<p><b>Sustaining</b> Allowing a cycling culture to continue to thrive in the school post-officer engagement.</p> <p>Walking Buses; Play Streets; Staff trained to deliver Bike Clubs</p>

## Results 2017-18



12 Primary schools engaged



Delivered 606 activities



Active travel to Bike It school increased by 6.8% following project delivery.



Driving to Bike It school reduced 6.5% following project delivery.

*Bike It is having a major impact on our school. Children are more interested in how they can help to decrease air pollution. Bike It has helped them to make the link between air pollution, exercise and healthy lifestyle. The enthusiasm of the Bike IT Crew keeps the rest of the school buzzing about what is happening next."*

School Champion  
Culloden Primary school





<p>Non-Executive Report to the:</p> <p><b>Air Quality Partnership Board</b></p> <p>5<sup>th</sup> March 2019</p>	 <p><b>TOWER HAMLETS</b></p>
<p><b>Report of:</b> Tom McCourt, Strategic Director</p>	<p><b>Classification:</b> Unrestricted</p>
<p><b>School Streets</b></p>	

<b>Originating Officer(s)</b>	Margaret Cooper, Head of Engineering
<b>Wards affected</b>	All

### **Executive Summary**

This report seeks to define the School Streets project committed in the Mayor's Manifesto.

It sets out the objectives for a programme to introduce school streets at 50 primary schools in the borough, outlining a proposed prioritisation methodology and identifying the first schools to be included in the programme for 2019/10.

The report also outlines the site-specific tools which could be applied to deliver air quality improvements outside schools after detailed feasibility studies. Each school identified will have a bespoke solution and the involvement of the school community will be vital to successful delivery to achieve behaviour change.

### **Recommendations:**

Air Quality Partnership Board are requested to :

1. Note the report and comment on the objectives set out;
2. Comment on the prioritisation process and the 15 schools to be addressed in 2019/20;
3. Note the variety of tools available to deliver improvements in air quality at these schools which will be selected subject to feasibility studies of each location;
4. Comment on the draft proposal for John Scurr School prior to formal public consultation.

## **1. REASONS FOR THE DECISIONS**

1.1 To deliver one of the key commitments in the Strategic Plan

## **2. ALTERNATIVE OPTIONS**

2.1 Do nothing will not achieve the objectives of improving air quality and changing travel behaviour.

## **3. DETAILS OF THE REPORT**

3.1 There is currently no design guidance from Central Government or Transport for London on School Streets, but given the number of local authorities already testing the use of new traffic regulations to deliver school streets, it is likely that guidance will be forthcoming during the lifetime of this project.

3.1 School Travel data from those which participate in the School Travel Planning process, indicates that the borough's schools already achieve a high level of walking to school ( average 80% ), but it is often those few parents who insist on dropping children at the school gate who cause problems of congestion, safety risks and poor air quality which affects everyone entering the school. It will be vital to have the school's support in encouraging further modal shift by parents if real behaviour change is to be achieved, hence the Travel Plan is essential.

### **3.2 OBJECTIVES**

- The primary objective of School Streets is to improve air quality at the school gate, particularly at entry /exit times, in order to improve the health of the pupils.
- Secondary objectives would include improving road safety for vulnerable pedestrians, reducing congestion, encouraging walking and cycling and thus facilitating behavioural change in travel choices and increased physical activity.

### **3.3 PRIORITISATION METHODOLOGY**

3.3.1 A number of factors will determine how soon a school can be brought into the programme :-

Air Quality ranking  
Air Quality Audits  
School Travel Plan status  
Potential for mode shift  
Risk Assessment for School Crossing Patrols  
Current complaints  
In target area for Low Traffic Neighbourhood ( 47 primaries )  
In target area for Public Health Schools Superzones  
Ringfenced funding availability

Participation in Cycle Training / Bikeability  
School readiness to participate

- 3.3.2 The table in Appendix A has been used to gather data from all interested parties within the Council on their own strategies for working with schools in order to take account of these issues in the prioritisation process.
- 3.3.3 It is recommended that Air Quality status is weighted more highly due to its importance in meeting the primary objective.
- 3.3.4 Based on the table in the Appendix, and the Strategic Plan target for delivery of 50 School Streets at Primary Schools by 2022, it is recommended that 15 schools are prioritised for treatment in 2019/20 and these would be :-

Marner P
John Scurr P
Cayley P
Blue Gate Fields P
English Martyrs RC P
Bonner (Bethnal Green) P
Columbia Market N
Cubitt Town P
Old Palace P
Ben Jonson P
Malmesbury P
Mayflower P
Culloden P
St Peter's (London Docks) CE P
Columbia P
Harry Gosling P

- 3.3.5 Appendix 2 includes an outline plan for John Scurr School which has been cleared for public consultation by the Mayor. Comments on this would be welcome prior to it being issued to the public.

### 3.4 **TOOLS**

The majority of trials in neighbouring boroughs are focussed on the low cost option of introducing a timed restriction on traffic using the street at school entry / exit times. These are in some cases enforced by school staff raising and lowering bollards in the carriageway, or they could be covered by ANPR camera monitoring issuing FPN's for violation of the traffic sign.

If there are residential properties in the street, some provision would need to be made for their essential access and egress even during these times. This could be accommodated by registering vehicles on the relevant ANPR White List and service vehicles ( such as refuse trucks) would be exempt.

A feasibility study for each school would need to determine the consequences of closing the street on traffic flow in other streets in the vicinity as a Statutory Network Management requirement. Consequently, other solutions might be

more appropriate depending on the nature of the conditions at the school gate e.g. congestion and U –turning.

Often problems of conflict between vehicles dropping off children occur causing congestion: idling and U-turns contribute to great confusion and add to road safety risks as well as poor air quality. It may be that more permanent, 24/7 solutions would be more effective e.g. full closure of a street to traffic ( e.g. as has taken place at Salmon St at Sir William Burrough); kerb buildouts to reduce crossing space; one-way streets to reduce conflicting traffic movement; new crossings and footprints ; etc.

Fig 1: Sir William Burrough road closure treatment



It has also been noted that some Council operations often conflict with school arrival times ( ie. Domestic refuse collections ) so the potential for adjustment of collection route timings could be considered where appropriate.

### 3.5 CONCLUSION

In conclusion, every identified school will need school gate surveys, traffic assessments and the production of a bespoke design prior to consultation with parents and local residents.

With approval of the list of the first 15 schools, a work programme will be drawn up for the year identifying required resourcing and funding available. A budget of £100k per annum has been ringfenced in the LIP Delivery plan 2019/20 with the intention of continuing this into future years and supplementing this with Council Capital funds

**4. EQUALITIES IMPLICATIONS**

- 4.1 The proposals seek to protect vulnerable road users, especially children, and improve air quality for all residents.

**5. OTHER STATUTORY IMPLICATIONS**

- 5.1 Environmental (including air quality):  
The aim of the project is to improve air quality and health.

**Appendices**

**Appendix One : School Streets Preliminary Assessment**

**Officer contact details for documents:**

## Appendix One : School Streets Preliminary Assessment

Comments please from :	Nick Marks	Nick Marks	Jack Ettinger	Donovan Thomas	Abi Knight	Parking	Tom Rawlings	All	Jack Ettinger	Terry Green
School (N/P/S)	Air Quality RAG	Air Quality Audit	School Travel Plan	RAG for School Crossing Patrol	School Superzone	Special Enforcement Action	Low Traffic Neighbourhood timing	Ringfenced funding	Cycle Training / Bikeability	Schools in Primary Review
Alice Model N	46.3 (rank 10 <sup>th</sup> )	Y	Bronze	Not justified			-			
Columbia Market N	46.8 (rank 9 <sup>th</sup> )	Y		Not justified			1			
Arnhem Wharf P				Not justified		S.E. 3	2			
Bangabandhu P				Not justified		S.E.13	2			
Ben Jonson P				Staffed		S.E.11	-			
Bigland Green P				Staffed but Vacant			2			
Blue Gate Fields P	50.3 (rank 6 <sup>th</sup> )		Bronze	Staffed			2			
Bonner (Bethnal Green) P		Yes		Not justified		S.E. 8	2			
Bonner (Mile End) P		Yes		Not justified			3			
Bygrove P			Bronze	Not justified			-			
Canary Wharf College (Eastferry) P			Bronze	Not justified			4			
Canary Wharf College (Glenworth) P			Bronze	Not justified			4			
Canon Barnett P	57.2 (rank 1 <sup>st</sup> )			Not justified			2			Yes



Cayley P			Gold	Staffed		S.E. 4	-		
Children's House N/P			Gold	Not justified			-		
Chisenhale P			Bronze	Not justified			1		
Christ Church CE P				Not justified			2		Yes
Columbia P			Bronze	Not justified	Complaint		1		
Cubitt Town P			Silver	Staffed			2		
Culloden P	52.1 (rank 3 <sup>rd</sup> )			Not justified			4		
Cyril Jackson P				Staffed	Cllr request		-		
Elizabeth Selby & Lawdale P			Bronze	Staffed - vacant			1		Yes
English Martyrs RC P	55.9 (rank 2 <sup>nd</sup> )		Gold	Not justified			-		
Globe P			Bronze	Not justified		S.E. 2	2		
Guardian Angels RC P	48.1 (rank 8 <sup>th</sup> )		Bronze	Not justified			2		
Hague P			Gold	Not justified			4		Yes
Halley P				Not justified			-		
Harbinger P			Bronze	Staffed			4		
Harry Gosling P				Not justified			-	110k	
Harry Roberts N/P			Gold	Not justified			-		
Hermitage P			Bronze	Staffed			1		Yes
John Scurr P			Bronze	Staffed		S.E. 5	3	10k	
Kobi Nazrul P			Bronze	Not justified	Complaint		4		
Lansbury Lawrence P				Not justified			-		
Malmesbury P			Bronze	Staffed			1		
Manorfield P			Bronze	Not justified			3		
Marion Richardson P				Not justified		S.E. 6	-		
Marner P	48.9 (rank 7 <sup>th</sup> )	Yes	Silver	Staffed			-		
Mayflower P				Staffed		S.E. 7	-		

Mowlem P				Not justified			2		
Old Church N/P			Bronze	Not justified			-		
Old Ford P				Not justified			1		
Old Palace P			Bronze	Staffed - vacant		S.E. 9	-		
Olga P			Bronze	Not justified			11		
Osmani P				Not justified			2		Yes
Our Lady & St Joseph P			Bronze	Not justified			-		
Rachel Keeling N/P			Bronze	Not justified			2		
Redlands P			Bronze	Staffed - vacant			-		Yes
Seven Mills P				Not justified			2		Yes
Shapla P	51.6 (rank =4 <sup>th</sup> )		Bronze	Not justified			-		
Sir William Burrough P				Staffed		S.E. 1	Done		
Smithy Street P			Bronze	Staffed		S.E.10	Part complete		Yes
Solebay Primary				Not justified		S.E.12	-		Yes
St Agnes RC P			Bronze	Not justified			-		
St Anne's RC P			Gold	Not justified			2		Yes
St Edmund's RC P				Staffed			4		
St Elizabeth's RC P			Gold	Not justified			2		
St John's CE P				Not justified			2		
St Luke's CE P				Staffed			4		
St Mary & St Michael RC P				Not justified			2		
St Matthias CE P				Not justified			1		Yes
St Paul's With St Luke's CE P	51.6 (rank =4 <sup>th</sup> )			Not justified			3		
St Paul's Way Foundation P				Not justified			3		
St Paul's Whitechapel CE P				Not justified			-		
St Peter's (London Docks) CE P				Staffed			1		

St Saviours CE P			Bronze	Not justified			-			
Stebon P				Not justified			3			
Stepney Greencoat CE P			Bronze	Not justified			3			
Stewart Headlam P			Bronze	Not justified			4			Yes
The Clara Grant P				Not justified			-			
Thomas Buxton P				Not justified			2			Yes
Virginia P			Bronze	Not justified			1			
Wellington P			Bronze	Not justified			-			
William Davis P			Bronze	Not justified			1			Yes
Woolmore P	42.5 (rank 11 <sup>th</sup> )			Not justified			-			

Appendix Two : Draft Scheme for John Scurr School




General Notes		
<p>Grouping No LETH/P/PR/ENG/032</p>		
No.	Revision/Issue	Date
<p>CEPHAS STREET, JCN COOPERS CLOSE &amp; MALCOLM STREET, E2</p>		
<p>PROPOSED LAYOUT OPTION 3</p>		
<p>TOWER HAMLETS DEPARTMENT OF PLACE ENGINEERING SERVICE Design &amp; Construction: John Coulson (Owner) 1, Evans Place London, E3 5JZ Tel: 020-7261-6000</p>		
Drawn by I. Powell	Checked	
Scale 1:200	Date May 17	
<p>A1 FRAME</p>		

# Appendix 6 - Anti-idling enforcement plan

Idling Hotspot areas	Notes	Anti-idling signage affixed	Enforcement Visit/s	Number of drivers spoken to/Advice given	Time of day idling occurs
Corner of Dod Street and Sainsby Road, E14 6JZ		Y	14/02/2019	4	No particular time
Copperfield Road E3 4RT / RHODESWELL RD		Y	21/02/2019	3	No particular time
Corner of Antill Road and Selwyn Road, E3 5EA		N			No particular time
Pennington Street	HGVs idling + use the road as a rat run	Y	17/01/2019	6	Early morning
Gawber Street, outside Globe Primary School	Parents idling their cars during pick up and drop offs	N	08/02/2019	8	School drop off and pick up time
Hamlets Way		N	08/03/2019	3	No particular time
1 King's Arms Court		N			No particular time
Vyner Street	Van and Truck drivers idling morning and late afternoon peak periods	Y	24/01/2019	5	Morning and late afternoons
Yabsley Street and Blackwall Way junction	Trucks idling as they wait to go into waste site	Y	10/01/2019	6	Early morning
14 North Tenter street		N	28/03/2019	3	No particular time
Wapping Lane, near Pizza express		N			No particular time
Jesus Green, Quilter Street	Delivery vehicles & car drivers idling	Y	31/01/2019	1	No particular time
Libra Rd, E3	A Market trader idling	N	22/01/2019	1	Early morning
Old Monatgue Street	Vehicles idling	N			No particular time
Masjid Lane	Construction Vehicles Idling	N			No particular time
Malesbury school		N	28/03/2019	7	School drop off and pick up time
Quaker Street	Vehicles idling all day/night	N			All day/night
Orchard Place E14	Construction vehicles idling	N	04/04/2019	10	All day
Gore Road	Issues with the Sunday market and park visitors				
Mile End Place	Issues with vehicles using the warehouse				

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<b>Cabinet</b>  31 July 2019	 <b>TOWER HAMLETS</b>
<b>Report of:</b> Ann Sutcliffe, Corporate Director of Place	<b>Classification:</b> Unrestricted
<b>Local Biodiversity Action Plan 2019-24</b>	

<b>Lead Member</b>	<b>Councillor David Edgar, Cabinet Member for Environment</b>
<b>Originating Officer(s)</b>	John Archer, Biodiversity Officer Abdul Khan, Service Manager – Energy, Sustainability & Private Sector Housing
<b>Wards affected</b>	All wards
<b>Key Decision?</b>	No
<b>Forward Plan Notice Published</b>	N/A
<b>Reason for Key Decision</b>	N/A
<b>Strategic Plan Priority / Outcome</b>	A borough that our residents are proud of and love to live in/People live in a borough that is clean and green

## Executive Summary

Under the Natural Environment & Rural Communities Act 2006, the Council is required to have regard to biodiversity conservation in the exercise of its functions.

The current Tower Hamlets Local Biodiversity Action Plan was adopted by Cabinet on 1<sup>st</sup> October 2014 and expires in September 2019. This proposed renewed Local Biodiversity Action Plan will cover the period of October 2019 to September 2024.

## Recommendations:

The Mayor in Cabinet is recommended to:

1. Approve the Local Biodiversity Action Plan 2019-24 as attached in Appendix 1
2. To note the Equalities Impact Assessment as set out in Paragraph 4.1

## **1 REASONS FOR THE DECISIONS**

- 1.1 Due to a range of factors such as climate change, overexploitation and habitat loss, biodiversity is declining across Britain and throughout the world. In Tower Hamlets, rapid growth and development is the main pressure facing the borough's wild plants and animals, but also provides a big opportunity to enhance biodiversity.
- 1.2 Under the Section 40 of the Natural Environment & Rural Communities Act 2006, all public bodies, including local authorities, must have regard to biodiversity conservation in the exercise of their functions. For local authorities, this is of most significance for planning and land management.
- 1.3 Through this action plan, the council can demonstrate local leadership, and demonstrate that it is meeting its responsibilities under the NERC Act, by setting out what is required to ensure that important biodiversity is conserved and enhanced in Tower Hamlets.

## **2 ALTERNATIVE OPTIONS**

- 2.1 The council could choose to retain the existing Local Biodiversity Action Plan 2014-19. However, this is set out with objectives and targets for the five-year period. Most of the existing targets have already been delivered, so adopting an updated LBAP is more appropriate.
- 2.2 The council could also choose not to have a Local Biodiversity Action Plan at all. However, the detailed specific guidance required by planning policies or the Tower Hamlets Green Grid Strategy would then be lacking, and it would be difficult for the Council to demonstrate how it would carry out its duty under the NERC Act to have regard to biodiversity conservation in the exercise of its functions.

## **3 DETAILS OF THE REPORT**

### **3.1 Biodiversity**

- 3.1.1 Biodiversity (or nature or wildlife) is the variety of wild plants and animals and the habitats they live in. This is important for several reasons:
  - We have a moral duty to protect the other species of plants and animals with which we share this planet.
  - Most people enjoy contact with nature, and there is clear evidence that access to nature and natural green space is beneficial for physical and mental health.
  - It has economic benefits; proximity to high-quality green space encourages businesses to locate in an area.
  - It also has functional benefits – such as flood protection, local climatic and air quality improvements and pollination.
- 3.1.2 Under the Section 40 of the Natural Environment & Rural Communities Act 2006, all public bodies, including local authorities, must have regard to



biodiversity conservation in the exercise of their functions. For local authorities, this is of most significance for planning and land management.

## **3.2 Strategic Plan**

3.2.1 Biodiversity is one of five key themes within the strategic outcome “People live in a borough that is clean and green”, which sits under the strategic priority “A borough that our residents are proud of and love to live in”. The strategic measures monitored under the biodiversity theme are directly linked to this LBAP. The four strategic measures are:

- area of priority wildlife habitat created or enhanced at ground level;
- area of biodiverse green roofs delivered through new developments;
- number of biodiversity enhancement projects involving residents, community groups and volunteers; and
- proportion of Sites of Importance for Nature Conservation in active management.

3.2.2 The first three of these strategic measures are directly related to implementation of the Local Biodiversity Action Plan.

## **3.3 Biodiversity Action Plans**

3.3.1 The idea of biodiversity action plans emerged from the Rio Earth Summit in 1992. Most local authorities have produced Local Biodiversity Action Plans to set priorities and targets for biodiversity conservation since the late 1990s. Local Biodiversity Action Plans are partnership documents, driven by local biodiversity partnerships which include local authorities, relevant voluntary and community groups, businesses, other major landowners and local residents.

3.3.2 The Tower Hamlets Biodiversity Partnership (known as Tower Habitats) is led by the Council and includes Tower Hamlets Homes, Registered Providers, tenants & residents associations, voluntary and community groups, parks friends groups, businesses such as Canary Wharf, educational establishments such as Queen Mary University of London, and interested local residents. It is run by a steering group which includes representatives of these sectors.

3.3.3 Tower Hamlets produced its first Local Biodiversity Action Plan (LBAP) in 2003, and adopted further LBAPs in 2009 and 2014. The current LBAP expires in September 2019, and is thus due for review and replacement.

## **3.4 Key achievements of the current LBAP 2014-2019.**

- Over 15 hectares of priority habitats created or enhanced.
- Around 180 biodiversity enhancement projects completed involving residents, community groups and volunteers.
- Over 2 hectares of flower-rich grassland created or enhanced in parks and housing estates.

- Over 2.5 hectares of biodiverse green roofs installed in new developments in line with planning policy.
- 1300 metres of mixed native hedge planted in parks, housing estates, schools and new developments.
- 16 new community orchards planted in parks and housing estates.
- Over 1500 metres of reed bed, soft banks and other habitat enhancements along canals and rivers.
- 14 new ponds created in schools and community gardens.
- Nectar-rich flowers planted at over 200 sites to provide food for bees and other pollinating insects.
- Bat boxes installed in over 40 sites.
- The Tower Hill Trust fund a grant scheme for schools and community groups specifically aimed at projects that help deliver the LBAP. This has awarded over 40 grants, totalling over £54,000, for improvements to school grounds and community gardens since 2016.

### 3.5 Consultation

3.5.1 The LBAP review commenced with a stakeholder feedback survey in August 2018. A questionnaire was emailed to 45 stakeholders who have been involved in or were known to have used the current LBAP. They were asked how useful they had found it overall, and specific questions about its structure and content. Twenty replies were received, from Council officers, housing providers, Lee Valley Regional Park, local community groups, regional NGOs and an ecological consultancy. All but one respondent had found the LBAP helpful, for managing land, obtaining funding, developing policy and/or planning development. Respondents generally liked the content and structure of the LBAP, with an ecological consultant saying “the LBTH BAP is one of the most thorough yet digestible and usable BAPs that we have come across”. The main addition suggested by respondents was some good practice guidance on how to deliver the objectives and targets.

3.5.2 The results of the stakeholder feedback consultation were presented to the Steering Group in September 2018. The Steering Group agreed that a replacement LBAP should be produced, and should follow the same basic structure and content as the current LBAP. The structure and content of the current LBAP were designed to be as concise as possible. The Steering Group felt that a significantly larger document would be much less likely to be read. The group agreed that good practice information would be very useful, but this should be a separate document and not included in the LBAP. It is proposed to publish this separately as a Technical Guidance Note, with the aim of having this available on the Council’s website by the time the LBAP is launched in October 2019. The Steering Group supported a few changes to priority habitats and species, most of which were recommended by respondents.

- 3.5.3 Following the Steering Group meeting, the Lead Member for the Environment, Councillor Edgar, was consulted in September 2018. He approved the approach recommended by the Steering Group.
- 3.5.4 A draft LBAP was then produced following the guidance of the Steering Group and Lead Member. This was circulated to the Steering Group for comments, and a revised draft was approved by the Steering Group for consultation in November 2018.
- 3.5.5 The draft LBAP approved by the Steering Group was presented to the Lead Member in December 2018. Councillor Edgar approved the draft LBAP, and, after confirmation that there is no statutory duty to consult on a Local Biodiversity Action Plan, agreed that full public consultation was not appropriate or useful for a technical document of this type. It was agreed to circulate the draft LBAP to key stakeholders not represented on the Steering Group for comments.
- 3.5.6 This stakeholder consultation was undertaken in January and February 2019. A revised draft LBAP, incorporating stakeholder comments, was circulated to the Steering Group and approved as a final draft in March 2019.

### **3.6 The new LBAP**

- 3.6.1 The LBAP 2019-24 closely follows the style and format of the current LBAP, as this received such favourable comments in stakeholder consultation.
- 3.6.2 The introductory section, linking the LBAP to other Council plans and strategies and to corporate, regional and national Biodiversity Action Plans has been updated, most significantly with a paragraph on links to the Strategic Plan.
- 3.6.3 There are a few minor changes to priority habitats and species. “Flower-rich grassland” replaces “neutral grassland” and “calcareous grassland” as a priority habitat, “wild bees” replaces bumblebees as a priority species group, and stag beetle and common blue butterfly have been removed from the list of priority species.
- 3.6.4 A number of targets have been changed, following a detailed analysis of what has been achieved under the current LBAP, and also what has already been secured through the development management process and is likely to be delivered between 2019 and 2024. The 2014-19 LBAP is the first Tower Hamlets LBAP to include detailed objectives and targets for the priority habitats and species. Informed guesswork played a role in the target setting for the current LBAP, and consequently several targets will not be achieved, while a number of others have been greatly exceeded. The lessons learned should ensure that the targets in the 2019-24 LBAP are all challenging but achievable.
- 3.7 **Monitoring:** The action plan will be monitored on an annual basis and an annual progress report will be published.

## **4 EQUALITIES IMPLICATIONS**

- 4.1 An Equality Analysis has been undertaken on the Local Biodiversity Action Plan (see Appendix 2). This found that there is nothing in the Local Biodiversity Action Plan which would adversely impact on any equalities target group. All sections of the community can benefit from enhanced biodiversity and more attractive green spaces, and it encourages community participation and thus helps community cohesion.

## **5 OTHER STATUTORY IMPLICATIONS**

- 5.1 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:

- Best Value Implications,
- Consultations,
- Environmental (including air quality),
- Risk Management,
- Crime Reduction,
- Safeguarding.
- Data Protection / Privacy Impact Assessment.

### **5.2 Best Value implications**

- 5.2.1 The LBAP will be delivered by a wide partnership of organisations. The co-ordination provided by the LBAP and its Steering Group will help to reduce duplication of effort among these organisations, and hence increase efficiency.
- 5.2.2 This Local Biodiversity Action Plan incorporates a true partnership approach whereby many of the actions are to be implemented by third sector partners. For this reason the LBAP represents excellent value for money and a worthwhile investment which contributes meaningfully to the Borough's strategic objectives of building sustainable communities.

### **5.3 Environmental implications**

- 5.3.1 This is an action plan for biodiversity conservation, which is a key element of environmental protection and sustainable development. It will help to protect and enhance key habitats and species, increase the amount and diversity of green space, and improve access to nature.
- 5.3.2 Apart from biodiversity conservation, there will be additional environmental benefits from some of the proposals in the action plan. For example, dense vegetation such as trees and hedgerows help trap particulates, hence reducing air pollution. Green roofs provide insulation, thus reducing the need for heating and cooling, and can also enhance the efficiency of solar

photovoltaic panels. Green roofs and vegetated landscapes reduce water runoff, contributing to sustainable urban drainage.

#### **5.4 Risk management**

- 5.4.1 A risk assessment has been undertaken and the Risk Register can be found at Appendix 3.
- 5.4.2 Implementing the Local Biodiversity Action Plan will slightly reduce several risks associated with climate change, including mitigating against increased temperatures and increased risk of flooding.
- 5.4.3 The main risk identified is a reputational risk if targets in the LBAP are not met. The risk is assessed as being manageable (green). The targets have been drawn up in discussion with the main stakeholders, taking account of likely resources, and an infrastructure for driving and monitoring delivery is in place from the existing LBAP.

#### **5.5 Crime reduction implications**

- 5.5.1 The action plan will lead to improved, more attractive open spaces, with local residents directly involved in many of the projects. This should lead to increased legitimate use of these spaces, and a sense of ownership among local people, which will in turn reduce crime and anti-social behaviour in these places.
- 5.5.2 Some biodiversity enhancement projects, such as those involving woodland or hedgerow planting, have the potential to reduce sightlines, and thus create places where anti-social behaviour can take place. All such projects undertaken as part of the LBAP will be individually assessed to ensure their location and design does not lead to a potential increase in crime and anti-social behaviour.

#### **5.6 Data Protection and Privacy**

- 5.6.1 The implementation, monitoring and promotion of the LBAP does not involve handling personally identifiable information in any of the ways listed in the Privacy Impact Assessment (PIA) checklist, either under the list for which PIA is always carried out, nor the list for which a PIA should be considered. It is therefore not considered necessary to carry out a PIA.

### **6 COMMENTS OF THE CHIEF FINANCE OFFICER**

- 6.1 The first Local Biodiversity Action Plan (LBAP) was adopted by the Council in 2003 and the third version of the plan is now approaching the end of its five-year timeframe. This report therefore seeks the approval of the Mayor in Cabinet for the adoption of the Local Biodiversity Action Plan for the period from 2019 to 2024.

- 6.2 The LBAP is a key tool that supports other Council plans and policies, including the Strategic Plan and the suite of documents that form the Local Plan. All of the policies, including the various planning documents and relevant studies, have already been adopted and no further expenditure is anticipated in connection with this area of the action plan.
- 6.3 The delivery of this action plan is mainly through the Biodiversity Partnership with costs being met from within the existing funded structures of the Council and its partners. It should be noted that there are limited funding streams available to finance any new projects although there might be opportunities to bid for specific Government grant resources in future.
- 6.4 Many of the proposals contained within the LBAP require management and co-ordination and are staffing related. The Council employs a full time Biodiversity officer and therefore this requirement will be met by the officer in post.

## **7 COMMENTS OF LEGAL SERVICES**

- 7.1 Under section 40 of the Natural Environment and Rural Communities Act 2006 a public authority(which is defined to include local authorities) must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. "Conserving biodiversity" includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat. A biodiversity action Plan is one way of ensuring that when exercising functions the local authority is having regard to this duty. It is to be observed that the Local Government Ombudsman frequently observes that most complaints about local government are about Councils not complying with their own adopted Policies and Plans. Cabinet is advised to seek assurance that the Plan is deliverable.

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### **Linked Reports, Appendices and Background Documents**

#### **Linked Report**

- NONE.

#### **Appendices**

- Appendix 1 – Tower Hamlets Local Biodiversity Action Plan 2019-24
- Appendix 2 – Equality Analysis
- Appendix 3 – Risk Register

#### **Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012**

- NONE.

#### **Officer contact details for documents:**

Abdul Khan



# Tower Hamlets Local Biodiversity Action Plan 2019-2024

Draft



## **Mayor foreword**

I am very pleased to adopt the Tower Hamlets Local Biodiversity Action Plan for 2019-24, which has been produced by Tower Habitats, our biodiversity partnership.

It may come as a surprise to some people that we have so much biodiversity in Tower Hamlets. Our buildings are home to rare birds such as the Peregrine Falcon and Black Redstart. And despite being one of the most densely-populated places in the country, we have some very special wild places, such as Tower Hamlets Cemetery Park, Mudchute and Mile End Park.

It is very important that we continue to protect and enhance our biodiversity, not only for its own sake but also to ensure people who live and work in Tower Hamlets have the opportunity to enjoy contact with nature. This Action Plan clearly sets out what the Council, registered housing providers, developers, community groups and residents can do to help conserve and enhance the important habitats and species in Tower Hamlets.

I look forward to working together with our partners to protect and enhance our environment.

## **Lead member foreword**

Our biodiversity partnership, Tower Habitats, can be very proud of its achievements over the last few years. This new Local Biodiversity Action Plan builds on the successes of the last plan, which was adopted in 2014. During those five years, a huge amount was achieved for biodiversity in the borough, including:

- creation and enhancement over two hectares of flower-rich grassland;
- planting of 8000 square metres of native woodland and 5000 square metres of orchards;
- twelve new ponds in schools and community gardens;
- new ponds in parks, community gardens and schools;
- around 1.5 kilometres of reed bed and other wetland vegetation created along canals and rivers;
- over two hectares of biodiverse green roofs on new buildings – Tower hamlets has a greater area of green roofs than any other London borough.

In addition, Mile End Park and Tower Hamlets Cemetery Park are recognised as leading examples of how to manage urban parks to produce a wealth of wild plants and animals, and a fantastic experience of nature for our residents and visitors. All this was recognised in 2018, when Tower Hamlets won the Biodiversity Award in the London in Bloom Awards.

This new plan demonstrates our continuing commitment to ensuring that Tower Hamlets becomes an even greener and more environmentally-friendly borough. It is crucial for us to conserve the environment around us, and it also makes the borough a more colourful and vibrant place to live.



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## Tower Hamlets Local Biodiversity Action Plan 2019-2024

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## 1 Introduction

- 1.1 Tower Hamlets is a densely built-up inner London borough. It nevertheless supports a surprising diversity of wild plants and animals in a range of habitats. These include protected species such as bats and the Black Redstart, and a number of rare invertebrates associated with brownfield land, such as the Brown-banded Carder Bee and Streaked Bombardier Beetle. There are two Local Nature Reserves in the borough at Mudchute and Tower Hamlets Cemetery Park. Both of these are also recognised as Sites of Metropolitan Importance for Nature Conservation, along with Mile End Park, the River Thames, the River Lea and the canals. The east of the borough lies within the Lea Catchment Nature Improvement Area.
- 1.2 This Local Biodiversity Action Plan (LBAP) has been produced by the Tower Hamlets biodiversity partnership, known as Tower Habitats<sup>1</sup>. This includes Tower Hamlets Council, Tower Hamlets Homes, social housing providers, local and Londonwide voluntary and community groups, businesses and local residents. All of these groups and individuals will be involved in implementation of the LBAP. This LBAP replaces previous LBAPs published in 2003, 2009 and 2014.
- 1.3 The plan identifies priority habitats and species in Tower Hamlets, and sets objectives and, where appropriate, targets for what needs to be done to ensure their conservation. This will inform the implementation of projects and actions by partner organisations. It also provides guidance to developers on the kinds of biodiversity enhancements expected in new developments. The LBAP does not include detailed actions. These will be developed throughout the five-year duration of the LBAP, and will be monitored and reported on in annual reports published on the Council's<sup>2</sup> and Tower Habitats<sup>3</sup> websites.

### Box 1: What is biodiversity and why is it important?

Biodiversity is the variety of life – the myriad species of plants and animals on earth and the range of habitats where they live. It also includes the genetic variation within species. Biodiversity includes elephants, sparrows and bluebells; woodlands, rivers and grassland.

There are many reasons why we should conserve biodiversity. It is important for its own sake, and most people agree that we have a moral duty to protect the other species of animals and plants with which we share this planet. It is important for people – most of us enjoy seeing flowers, hearing birdsong and being in natural places, and there is clear evidence that contact with nature is beneficial to our physical and mental wellbeing. Biodiversity also provides economic and functional benefits, such as pollination, flood risk reduction and local climate amelioration. These functional benefits will become increasingly important as climate change leads to more frequent extreme weather events.

### 1.4 Structure of the LBAP

- 1.4.1 The LBAP includes background information on how it fits in with other Council policies and initiatives, and with national and London-wide biodiversity plans. It then identifies priority habitats and species, setting objectives and, where appropriate, targets for each. Finally, there are four action plans.
- 1.4.2 Biodiversity Action Plans are generally made up of a series of habitat action plans and species action plans for each of the priority habitats and species. In Tower

<sup>1</sup> Tower Habitats website [www.towerhabitats.org](http://www.towerhabitats.org)

<sup>2</sup> [https://www.towerhamlets.gov.uk/lqnl/environment\\_and\\_waste/sustainability/biodiversity.aspx](https://www.towerhamlets.gov.uk/lqnl/environment_and_waste/sustainability/biodiversity.aspx)

<sup>3</sup> <https://www.towerhabitats.org/your-habitats/the-local-biodiversity-action-plan/>

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Hamlets, we have found it more useful to divide our LBAP into four action plans based around the major land uses in the borough: the built environment; gardens and grounds; rivers and standing water; and parks, squares and burial grounds.

- 1.4.3 Each action plan lists the priority species and habitats relevant to the plan. It then sets out what the key stakeholders can do to achieve the objectives and targets for these species and habitats, and what will be done to raise awareness of biodiversity. More detailed guidance for stakeholders (including developers) on how to deliver objectives for each priority habitat and species will be published separately on the Council's and Tower Habitats websites<sup>4</sup>.
- 1.4.4 The action plans do not include lists of detailed actions that will be undertaken to achieve the objectives and targets. These will be identified throughout the life of the plan and entered and reported on in annual reports published on the Council's<sup>5</sup> and Tower Habitats websites<sup>6</sup>.



This beautiful meadow at Approach Gardens was created under the 2014-19 LBAP

<sup>4</sup> links to be added when the guidance has been written

<sup>5</sup> [https://www.towerhamlets.gov.uk/lqnl/environment\\_and\\_waste/sustainability/biodiversity.aspx](https://www.towerhamlets.gov.uk/lqnl/environment_and_waste/sustainability/biodiversity.aspx)

<sup>6</sup> <https://www.towerhabitats.org/your-habitats/the-local-biodiversity-action-plan/>

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## 2 Background

### 2.1 Relationship with other biodiversity action plans and strategies

2.1.1 A wide range of European, national, regional and local legislation, policy and guidance has a bearing on biodiversity conservation. Full details of these are available on the Tower Habitats website<sup>7</sup> and it is not necessary to detail them here, as this LBAP has no direct bearing on their implementation.

2.1.2 Action for biodiversity in Tower Hamlets can contribute to London-wide and national targets for priority species and habitats. These priorities and targets are, therefore, an important factor in setting our local priorities. Tables 1 and 2 indicate which Tower Hamlets priority habitats and species are also national and London priorities.

#### 2.1.3 National

The UK Biodiversity Action Plan has been replaced by national biodiversity strategies for England, Wales and Scotland. *Biodiversity 2020: a strategy for England's wildlife and ecosystem services* (DEFRA 2011)<sup>8</sup> has moved away from the habitat- and species-based approach and clearly-defined targets of a biodiversity action plan, and concentrates instead on landscape-scale conservation, with an overall target of halting biodiversity loss by 2020. Guidance on national priority habitats and species now comes from the list of Habitats and Species of Principal Importance in England<sup>9</sup>, identified under Section 41 of the Natural Environment & Rural Communities Act 2006<sup>10</sup>.

#### 2.1.4 London

Priority habitats<sup>11</sup> and species<sup>12</sup> in London have been identified by the London Biodiversity Partnership. There are London action plans in place for the habitats and a few of the species. The London Environment Strategy<sup>13</sup> sets targets for creation of new species-rich woodland, flower-rich grassland and reed beds, and enhancement of rivers and streams, by 2025 and 2050.

#### 2.1.5 Other local BAPs

At least three major landowners within the borough have their own biodiversity action plans. The eastern edge of Tower Hamlets lies within the Lee Valley Regional Park, which has published the Lee Valley Biodiversity Action Plan 2019-2029<sup>14</sup>. This is soon to be updated. Canary Wharf Ltd published a revised corporate biodiversity action plan<sup>15</sup> in 2018 for its estate on the Isle of Dogs. The north-eastern corner of the borough lies within the Legacy Communities Scheme from the 2012 Olympics, for which the London Legacy Development Corporation has produced the Legacy Communities Scheme Biodiversity Action Plan 2014-2019<sup>16</sup>, which is due to be updated in 2019. Tables 1 and 2 indicate which Tower Hamlets priority habitats and species are also priorities in these three BAPs.

<sup>7</sup> <https://www.towerhabitats.org/planning-resources/>

<sup>8</sup> [Biodiversity 2020: A strategy for England's wildlife and ecosystem services](#) (DEFRA 2011)

<sup>9</sup> [Habitats and Species of Principal Importance in England](#) (Secretary of State for Environment, Farming & Rural Affairs 2010)

<sup>10</sup> [Natural Environment and Rural Communities Act 2006](#)

<sup>11</sup> [London's BAP priority habitats](#) (London Biodiversity Partnership)

<sup>12</sup> [London's BAP priority species](#) (London Biodiversity Partnership)

<sup>13</sup> [The London Environment Strategy](#) (Mayor of London 2018)

<sup>14</sup> [Lee Valley Regional Park Biodiversity Action Plan 2019-2029 \(LVRPA 2019\)](#) (link to be added)

<sup>15</sup> [Canary Wharf Group Biodiversity Action Plan 2018-2028](#) (Canary Wharf Group 2018)

<sup>16</sup> [Legacy Communities Scheme Biodiversity Action Plan 2014-2019](#) (London Legacy Development Corporation 2013)

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## 2.2 Relationship to other policies and plans in Tower Hamlets

The LBAP directly affects the implementation of Tower Hamlets Council's planning policy and other Council plans and strategies including the Strategic Plan, Tower Hamlets Green Grid, Open Space Strategy, Sustainable Urban Drainage Guidance and Air Quality Action Plan.

### 2.2.1 Strategic Plan

Biodiversity is recognised as being important in the Council's Strategic Plan 2018-2021. It is one of five key themes within the strategic outcome "People live in a borough that is clean and green", which sits under the strategic priority "A borough that our residents are proud of and love to live in". The strategic measures monitored under the biodiversity theme are directly linked to this LBAP. The four strategic measures are:

- area of priority wildlife habitat created or enhanced at ground level;
- area of biodiverse green roofs delivered through new developments;
- proportion of Sites of Importance for Nature Conservation in active management; and
- number of biodiversity enhancement projects involving residents, community groups and volunteers.

### 2.2.2 Planning Policy

Planning Policy in Tower Hamlets is set out in the Local Plan. The two main Development Plan Documents, the Core Strategy (adopted 2010)<sup>17</sup> and the Managing Development Document (adopted 2013)<sup>18</sup>, both contain policies seeking to protect and enhance biodiversity. Policy SP04, part 3, in the adopted Core Strategy seeks to protect and enhance biodiversity value through the design of open space and buildings and ensuring development protects and enhances areas of biodiversity value in order to achieve a net gain in biodiversity. The more detailed Policy DM11 in the Managing Development Document includes two direct references to the LBAP. Clause 3 provides protection in planning to the priority species identified in the LBAP, and clause 4 indicates that biodiversity enhancements in major developments should contribute to the objectives in the LBAP. To assist developers in this, each action plan sets out details of how developers can contribute to the objectives and targets in this LBAP.

2.2.3 The Local Plan will be updated in 2019. The Core Strategy and Managing Development Document will be replaced by a single Local Plan 2031<sup>19</sup>. The new Local Plan has completed its Examination in Public (EiP), and the Inspector's report is awaited. The key policies relating to biodiversity are strategic policy S.ES1 on protecting and enhancing our environment and policy D.ES3 on urban greening and biodiversity (see box overleaf). These are not expected to change significantly.

2.2.4 Strategic policy S.ES1 states that "Proposals will be supported that work to minimise the use of natural resources and seek proactively to protect and enhance the natural environment through ..... protecting and enhancing biodiversity, with the aims of meeting the objectives of the latest Tower Hamlets Local Biodiversity Action Plan and Thames River Basin Management Plan and improving opportunities to experience nature, especially in deficient areas".

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<sup>17</sup> [Core Strategy Development Plan Document](#) (LB Tower Hamlets 2010)

<sup>18</sup> [Managing Development Document Development Plan Document](#) (LB Tower Hamlets 2013)

<sup>19</sup> [Tower Hamlets Local Plan 2031 latest version](#) (LB Tower Hamlets 2018)

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### **Box 2: Policy D.ES3 Urban greening and biodiversity**

(note: the wording may change before adoption of the Local Plan)

- 1 Development is required to protect and enhance biodiversity, through:
  - a maximising the provision of 'living building' elements\*;
  - b retaining existing habitats and features of biodiversity value or, if this is not possible, replacing them within the development, as well as incorporating additional measures to enhance biodiversity\*\*, proportionate to the development proposed; and
  - c protecting and increasing the provision of trees, through:
    - i protecting all trees, including street trees;
    - ii incorporating native trees, wherever possible; and
    - iii providing replacement trees, including street trees, where the loss of or impact on trees in a development is considered acceptable.
- 2 Major development is required to submit an ecology assessment demonstrating biodiversity enhancements that contribute to the objectives of the latest Tower Hamlets Local Biodiversity Action Plan and the Thames River Basin Management Plan.
- 3 Planting and landscaping around developments must not include 'potentially invasive non-native species'. Invasive non-native species listed in schedule 9 of the Wildlife and Countryside Act must be controlled, and eradicated where possible, as part of redevelopment.
- 4 Development must not negatively impact on any designated European site such as Special Protection Areas, Special Areas of Conservation or Ramsar sites. Developments which might have the potential to adversely impact a Special Protection Area or Special Area of Conservation outside the borough will be required to submit Habitat Regulations Assessments.
- 5 Developments which affect a Site of Importance for Nature Conservation, or significantly harm the population or conservation status of a protected or priority species\*\*\*, are required to be managed in accordance with the following hierarchy:
  - a Adverse impacts to the biodiversity interest should be avoided.
  - b Where avoidance is not possible, proposals must minimise and mitigate the impact to the biodiversity interest.
  - c As a last resort for exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, appropriate compensation will be sought.
  - d Where appropriate compensation is not possible, planning permission will be refused.

\* Explanatory paragraph 9.21 states that in implementing part 1 (a) 'living building' elements need to contribute to local biodiversity through providing priority habitats, and/or features for priority species, as identified in the latest Tower Hamlets Local Biodiversity Action Plan.

\*\* Explanatory paragraph 9.24 states that the latest Tower Hamlets Local Biodiversity Action Plan should give details of priority habitats and/or features for priority species.

\*\*\* Paragraph 9.27 states that priority species include those identified in the Tower Hamlets Local Biodiversity Action Plan.

2.2.5 Greater detail of what is required of developers is provided by policy D.ES3. This new policy includes several references to the LBAP. Clause 5 provides protection in planning to the priority species identified in the LBAP. Clauses 1a and 1b seek to maximise living building elements, such as green roofs, biodiversity enhancements; the accompanying explanation states that these should contribute to priority habitats and species identified in the LBAP. Clause 2 indicates that biodiversity enhancements in major developments should contribute to the objectives in the

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LBAP. To assist developers in this, each action plan sets out details of how developers can contribute to the objectives and targets in this LBAP.

2.2.6 Other Local Plan policies provide useful hooks that support LBAP implementation. Strategic policies S.OWS1 on creating a network of open spaces and S.OWS2 on enhancing the network of water spaces both seek enhancements in line with the LBAP. Policy D.OWS3 states that new open space within strategic developments should enhance biodiversity, contributing to objectives identified in the LBAP. Similarly, policy D.OSW4 on water spaces requires developments within or adjacent to water spaces to enhance the biodiversity of the water space in line with the LBAP. Policy D.ES4 on flood risk requires buffer strips alongside rivers, and optimising opportunities to realign or set back defences and improve the riverside frontage to provide amenity space and environmental enhancement.

### 2.2.7 Tower Hamlets Green Grid

The Tower Hamlets Green Grid Strategy<sup>20</sup> is the Council's strategy to create an interlinked network of high quality, multifunctional, accessible, green open spaces and waterways in Tower Hamlets that will encourage active lifestyles and improve quality of life. Improving biodiversity is one of the key principles that influence public health outcomes through promotion of healthier behaviours, active communities, improved community safety and environmental exposure. The Green Grid offers a delivery mechanism to provide the connectivity of habitats which is an important element of biodiversity conservation. The priorities in this LBAP will guide the biodiversity enhancement to be delivered through Green Grid projects.

### 2.2.8 Open Space Strategy

The Council's Open Space Strategy<sup>21</sup> provides an assessment of the quality and quantity of open space in the borough, in the context of the views, needs and expectations of residents and an analysis of current and future local demand for open space, and outlines an action plan for parks and open spaces covering the first five years of the strategy. The Strategy recognises that enhancing biodiversity, contributing to the objectives identified in the LBAP, is a key role of existing and new open spaces.

### 2.2.9 Sustainable Urban Drainage Systems (SuDS) Guidance

The Council's guidance on sustainable urban drainage systems (SuDS)<sup>22</sup> recognises that, in addition to their primary purpose of reducing flood risk, SuDS can and should provide biodiversity enhancements. It states that these should be guided by local priorities identified in the LBAP.

### 2.2.10 Air Quality Action Plan

One of the key priority work areas in the Air Quality Action Plan<sup>23</sup> is investing and encouraging new technologies and planting systems which can tackle air quality. There could be overlaps where planting can deliver biodiversity and air quality benefits.

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<sup>20</sup> [Tower Hamlets Green Grid Strategy: Update 2017](#) (LB Tower Hamlets 2017)

<sup>21</sup> [Parks & Open Spaces: An open space strategy for The London Borough of Tower Hamlets 2017-2027](#) (LB Tower Hamlets 2017)

<sup>22</sup> [London Borough of Tower Hamlets – SuDS Guidance](#) (LB Tower Hamlets 2014)

<sup>23</sup> [London Borough of Tower Hamlets Air Quality Action Plan 2017-2022](#) (LB Tower Hamlets 2017)



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### 2.3 Management and monitoring

- 2.3.1 Implementation and monitoring of the LBAP is overseen by a Steering Group. This is chaired by the Council's Biodiversity Officer and includes representatives of relevant Council departments (including Parks, Development Management, Public Health, Clean & Green, Infrastructure Delivery and Strategic Planning), Tower Hamlets Homes, other social housing providers (currently Poplar HARCA, Gateway Housing Association, Clarion Housing and EastendHomes), environmental groups (currently Friends of Meath Gardens, Friends of Tower Hamlets Cemetery Park, Mudchute Association, Thames21 and Trees for Cities) and local residents.
- 2.3.2 The Biodiversity Officer will keep a record of all projects, including planning applications, which contribute to LBAP objectives and targets. The Steering Group will publish an annual report detailing progress on implementation of the LBAP and progress against all the objectives and targets. These annual reports will be available on the Council's<sup>24</sup> and Tower Habitats<sup>25</sup> websites.



Children help to plant a fruit tree in a new orchard at Mudchute

<sup>24</sup> [https://www.towerhamlets.gov.uk/lgn/environment\\_and\\_waste/sustainability/biodiversity.aspx](https://www.towerhamlets.gov.uk/lgn/environment_and_waste/sustainability/biodiversity.aspx)

<sup>25</sup> <https://www.towerhabitats.org/your-habitats/the-local-biodiversity-action-plan/>

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### 3 Priority habitats and species

#### 3.1 Priority habitats

The following habitats have been identified as priorities for conservation action in Tower Hamlets.

Table 1: Priority habitats	England priority <sup>26</sup>	London priority <sup>27</sup>	Lee Valley Priority <sup>28</sup>	Canary Wharf Priority <sup>29</sup>	Olympic Legacy Priority <sup>30</sup>
Flower-rich grassland	some	X	X		X
Open mosaic habitats	X	X	X	biodiverse roofs	X
Native broadleaved woodland		X	X		wet woodland
Orchards	X		X		
Mixed native hedgerows	X				
Rivers	X	X	X		X
Standing water (canals & docks)		canals	X	docks	
Ponds	X	X	X		X
Reed beds	X	X	X		X

#### 3.1.1 Flower-rich grassland

Grassland is widespread in Tower Hamlets, especially in parks and around housing estates. Much of it is amenity grassland, which is short-mown and low in plant diversity, but there are also flower-rich meadows which support a wealth of invertebrates. Most of these have been deliberately created comparatively recently, but there are a few small areas which may be relict older grassland. The most extensive areas of meadow are in Mile End Park, Mudchute and Tower Hamlets Cemetery Park. Some of the borough's flower-rich grassland has been created on alkaline substrates such as crushed chalk or crushed concrete. These areas show characteristics of chalk grassland.



##### Objectives for flower-rich grassland

- To ensure existing meadows are protected and managed to retain their value.
- To enhance grassland in parks, housing estates and community gardens by planting bulbs and wildflower plugs and seeds. **[Target: 1 hectare]**
- To increase the area of flower-rich grassland by creating new meadows in parks, housing estates, new developments, schools and community gardens on neutral or alkaline substrates. **[Target: 1 hectare]**

<sup>26</sup> [Habitats and Species of Principal Importance in England](#) (Secretary of State for Environment, Farming & Rural Affairs 2010)

<sup>27</sup> [London's BAP priority habitats](#) (London Biodiversity Partnership)

<sup>28</sup> [Lee Valley Regional Park Biodiversity Action Plan 2019-2029 \(LVRPA 2019\)](#) (link to be added)

<sup>29</sup> [Canary Wharf Group Biodiversity Action Plan 2018-2028](#) (Canary Wharf Group 2018)

<sup>30</sup> [Legacy Communities Scheme Biodiversity Action Plan 2014-2019](#) (London Legacy Development Corporation 2013)

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### 3.1.3 Open mosaic habitats

The sparsely-vegetated but flower-rich habitats typical of wasteland or brownfield land support important communities of rare invertebrates as well as the Black Redstart, a specially-protected bird. Now termed “open mosaic habitats on previously developed land”, this is a priority habitat for England. Large areas of this habitat have been lost in recent years as derelict sites are redeveloped, and further losses are inevitable. There is little open mosaic habitat remaining in Tower Hamlets at ground level, though significant amounts are being created on biodiverse roofs. It is not a habitat which readily lends itself to public amenity spaces as, although it can look beautiful when in flower, it is bare and unappealing in winter. It is anticipated that most creation of new open mosaic habitat will be on roofs. Biodiverse roofs should be designed in line with best practice guidance published by Buglife<sup>31</sup>.



#### Objectives for open mosaic habitats

- To ensure that, where development leads to the loss of open mosaic habitats, at least an equal area of replacement open mosaic habitat is created.
- To increase the area of open mosaic habitats through creating new habitat on green roofs, within landscaping around industrial developments and, where appropriate, in parks. **[Target: 3 hectares]**

### 3.1.4 Native broadleaved woodland

There is little woodland in Tower Hamlets, and none of it is ancient woodland. The largest woodland is in Tower Hamlets Cemetery Park, and there are also significant areas in Mile End Park, Weavers Fields and Mudchute. Little of the woodland in the borough is exclusively native, with Cemetery Park dominated by Sycamore. The priority for woodland is to protect and enhance our existing woods. There is probably little scope for creating any significant new woods in the borough, though there may be opportunities to plant new small groves and copses. While no specific target for woodland creation is included in this LBAP, any such opportunities should be taken. While not strictly woodland, the numerous trees in the borough’s parks, streets, housing estates and gardens are an important component of the “urban forest”, providing valuable habitat for birds, bats and invertebrates. This is particularly true of native trees and those which are good sources of nectar and/or berries, as well as large trees which provide structural habitat. Managing these trees properly, and planting more in places where they do not harm existing open habitats, will contribute to biodiversity conservation. The Mayor has pledged to plant 1000 extra street trees by 2022.



#### Objectives for woodland

- To protect existing woodland and manage it to retain its biodiversity value.

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<sup>31</sup> [Creating green roofs for invertebrates: a best practice guide](#) (Buglife)

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- To enhance existing woodlands by gradually increasing the proportion of native trees and shrubs, increasing the diversity of ground flora and/or improving woodland structure. **[Target: 3 hectares]**
- To create new areas of native broadleaved woodland. **[No specific target]**
- To plant more native trees in appropriate places in parks, housing estates and new developments. **[No specific target]** (Projects planting at least three species of native trees on a site will be considered to contribute to this objective provided they do not harm existing flower-rich grassland or other priority habitats).

### 3.1.5 Orchards

Traditional orchards, composed of fruit and nut trees with meadow beneath, are a valuable habitat, supporting a number of specialist invertebrates. Several small orchards have been planted in Tower Hamlets' parks and housing estates in recent years, as part of the increasing trend for local food growing.



#### Objectives for orchards

- To manage existing and new orchards to promote their biodiversity value.
- To increase the area of orchards by planting new orchards in parks, housing estates, new developments, schools and community gardens. **[Target: 0.5 hectare]**

### 3.1.6 Mixed native hedgerows

Hedgerows, especially those made up of a mixture of native shrubs and trees, provide food and shelter for a wide range of animals, and can act as corridors to help plants and animals disperse through the landscape. There are numerous hedges in Tower Hamlets.



#### Objectives for hedgerows

- To ensure existing hedges are protected and managed to maintain their biodiversity value.
- To increase the length of hedgerows by planting more mixed native hedges in parks, housing estates, schools, gardens (including community gardens) and streets. **[Target: 500 metres]**

### 3.1.7 Rivers

The Thames and Lea respectively form the southern and eastern boundaries of the borough. Both are tidal and have been highly modified, with vertical walls, and both have issues with water quality and invasive non-native species. Nevertheless, they support a wealth of aquatic birds, fish and invertebrates. Providing vegetation such as reed beds along the river walls can improve water quality and habitats for fish and birds. Enhancing tidal rivers is not straightforward, and the difficulty is recognised by the lack of a specific target for river enhancement in this plan. The Thames Estuary Partnership has published guidance on how this can be done<sup>32</sup>. Sustainable urban drainage systems



<sup>32</sup> [Estuary Edges](#) (Environment Agency/Thames Estuary Partnership)

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(SUDS) can also improve water quality through reducing the amount of runoff entering our rivers.

### Objectives for rivers

- To enhance rivers by controlling invasive species, providing marginal vegetation on river walls, and encouraging schemes to improve water quality. **[No specific target]**

### 3.1.8 Standing open water (canals & docks)

Tower Hamlets contains a network of canals, which support populations of aquatic birds, fish, invertebrates and plants. The tow-paths also provide narrow green corridors. Some sections of canal are almost devoid of marginal vegetation. The docks also support fish and water birds, but are even more lacking in vegetation and places for birds to nest. The provision of marginal vegetation through innovative, low maintenance, robust solutions such as suspended gabion structures and suitably specified floating island technologies can address these issues providing they are agreed in advance with the waterway owner.



### Objectives for canals and docks

- To maintain the biodiversity value of canals by controlling invasive species.
- To enhance canals by increasing the length of canal with emergent and marginal vegetation. **[Target: 1 kilometre]**
- To enhance docks by providing vegetation on dock walls, floating islands and fish habitat. **[Target: 5 sites]**

### 3.1.9 Ponds

Ponds are excellent for wildlife, supporting amphibians, dragonflies and many other invertebrates. There are numerous ponds in Tower Hamlets, in parks, community gardens, schools and private gardens.

### Objectives for ponds

- To ensure existing ponds are protected and managed to maintain their biodiversity value.
- To increase the number of ponds by creating new ponds in appropriate places in parks, housing estates, community gardens, schools and gardens. **[Target: 5 ponds]**



### 3.1.10 Reed beds

Reed beds are important for a number of specialist birds and invertebrates. Reed beds in Tower Hamlets are found as intermittent, mostly narrow, fringes along our rivers and canals, with a slightly more extensive area at East India Dock Basin.

### Objectives for reed beds

- To ensure existing reed beds are protected and managed to maintain their biodiversity value.
- To enhance reed beds by removing scrub and invasive species. **[No specific target]**
- To increase the area of reed beds by planting new reed beds along rivers, canals and dock walls and on floating islands in the docks. **[Target: 500m<sup>2</sup>]**



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### 3.2 Priority species

The conservation of species is generally best delivered through action to protect and enhance their habitats. However, there are a number of species, or groups of species, which can benefit from specific, targeted actions. These have been identified as priority species in Tower Hamlets.

<b>Table 2: priority species</b> <b>Species or group</b>	<b>Scientific name</b>	<b>England priority<sup>33</sup></b>	<b>London priority<sup>34</sup></b>	<b>Lee Valley Priority<sup>35</sup></b>	<b>Canary Wharf Priority<sup>36</sup></b>	<b>Olympic Legacy Priority<sup>37</sup></b>
Bats (all species)	Vespertilionidae	some	X	X	X	X
Hedgehog	<i>Erinaceus europaeus</i>	X	X	X		
Otter	<i>Lutra lutra</i>	X	X	X		X
Black Redstart	<i>Phoenicurus ochruros</i>		X	X	X	X
Common Tern	<i>Sterna hirundo</i>				X	
House Martin	<i>Delichon urbica</i>				X	
House Sparrow	<i>Passer domesticus</i>	X	X	X	X	X
Kingfisher	<i>Alcedo atthis</i>			X	X	X
Peregrine	<i>Falco peregrinus</i>		X	X	X	X
Sand Martin	<i>Riparia riparia</i>		X	X		X
Swift	<i>Apus apus</i>				X	X
Amphibians (all species)	Amphibia	some	some	some		X
European Eel	<i>Anguilla anguilla</i>	X	X	X	all fish	X
Brimstone butterfly	<i>Gonepteryx rhamni</i>					
Wild bees (all species of bumblebees and solitary bees)	Apoidea	some	some	some	X	X
Streaked Bombardier Beetle	<i>Brachinus sclopeta</i>	X	X	X		
Black Poplar	<i>Populus nigra</i> <i>ssp betulifolia</i>		X	X		
Jersey Cudweed	<i>Gnaphalium luteoalbum</i>					

<sup>33</sup> [Habitats and Species of Principal Importance in England](#) (Secretary of State for Environment, Farming & Rural Affairs 2010)

<sup>34</sup> [London's BAP priority species](#) (London Biodiversity Partnership)

<sup>35</sup> [Lee Valley Regional Park Biodiversity Action Plan 2019-2029 \(LVRPA 2019\)](#) (link to be added)

<sup>36</sup> [Canary Wharf Group Biodiversity Action Plan 2018-2028](#) (Canary Wharf Group 2018)

<sup>37</sup> [Legacy Communities Scheme Biodiversity Action Plan 2014-2019](#) (London Legacy Development Corporation 2013)

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### 3.2.1 Bats

At least three species of bats are regularly recorded in Tower Hamlets. The Common Pipistrelle is the most frequently recorded species. Soprano and Nathusius's Pipistrelles are also fairly widespread in the borough. There have also been occasional records of several other species, including Noctule and Leisler's Bat, in recent years. Bats require safe places to roost, usually in buildings or old trees, and good foraging habitat with plenty of nocturnal insects. The likelihood of bats



roosting in a building increases with the age of the building, the presence of features such as lofts and gable ends, and the proximity to good feeding habitat such as woodland, water and large open spaces. General improvements to, and increase in, habitats such as woods, hedgerows and meadows will benefit bats. Specific interventions for bats generally relate to provision of roosting sites, such as bat boxes, in appropriate places, and including night-flowering plants in landscaping in areas where bats are likely to forage. Outdoor lighting should be designed to minimise impacts on foraging and roosting bats, and lighting of roosts and important foraging habitat such as waterways and treelines should be avoided. Best practice guidance has been published by the Institution of Lighting Professionals.<sup>38</sup> All bats and their roosts are strictly protected under the European Union Habitats Directive<sup>39</sup>. All bats are London priority species, and Soprano Pipistrelle and Noctule are priority species in England.

#### Objectives for bats

- To ensure potential impacts on bats are considered in the assessment of all planning applications.
- To provide roost sites for bats, such as bat boxes or bat bricks, in new developments, housing estates, parks and schools in parts of the borough where bats are likely to use them. **[Target: 30 sites]**
- To encourage nocturnal insects by planting night-scented plants in landscaping schemes in parts of the borough where bats are likely to forage. **[No specific target]**

### 3.2.2 Hedgehog

Hedgehogs have declined alarmingly in Tower Hamlets in recent years, part of a national decline. There have been no records since 2013 from their previous stronghold in the south of the Isle of Dogs. The only records since then have been from Tower Hamlets Cemetery Park, where a small number of rescue Hedgehogs were released in 2015, and a single individual near Stepney Green. As they are nocturnal and



tend to occur in private gardens, surveying for Hedgehogs is difficult, and encouraging residents to report hedgehog sightings remains a priority. As much of their habitat is within private gardens, encouraging hedgehog-friendly gardening is

<sup>38</sup> [Guidance Note 8: Bats and artificial lighting](#) (Institution of Lighting Professionals 2018)

<sup>39</sup> [Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora](#)

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likely to be more effective than direct interventions. This includes increasing connectivity by ensuring Hedgehogs can pass under garden fences, avoiding use of slug pellets, and checking bonfires before lighting them. Specific interventions generally relate to providing secure places to hibernate.

### Objectives for Hedgehog

- Continue to seek information on the distribution of Hedgehogs in the borough.
- Encourage Hedgehog-friendly gardening in areas where Hedgehogs are still present by providing information to residents on how to help hedgehogs.
- Install Hedgehog homes in appropriate places in parks, housing estates, schools and community gardens in parts of the borough where Hedgehogs still occur. **[No specific target]**

### 3.2.3 Otter

Otters are not currently resident in Tower Hamlets, but they occur further up the River Lea and the population is expanding, so they could easily colonise in future. There has been one recent record in Tower Hamlets. Otter conservation is largely a matter of improving river habitats and water quality. In heavily-modified watercourses such as we have in Tower Hamlets, lack of suitable breeding sites could be a limiting factor for Otters, so the provision of artificial holts in suitable waterside locations could assist colonisation. The Otter is strictly protected under the European Union Habitats Directive<sup>40</sup>.



### Objectives for Otter

- To ensure that the possible presence of Otters is considered in the assessment of planning applications adjacent to watercourses.
- To install artificial holts in appropriate waterside locations, including in new developments. **[Target: 1 site]**

### 3.2.4 Black Redstart

The Black Redstart is a nationally scarce breeding bird, associated with industrial and brownfield sites. A few pairs nest in Tower Hamlets each year, mostly in the south and east of the borough, but numbers and sites vary from year to year. In some years, up to 10% of the UK population might nest in the borough. Conservation of Black Redstarts is linked to the provision of open mosaic habitats, including on green roofs, for which the species is a flagship in London. Specific interventions involve providing nest sites in suitable places. The Black Redstart is strictly protected under Schedule 1 of the Wildlife & Countryside Act 1981<sup>41</sup>.



### Objectives for Black Redstart

- To ensure that the possible presence of Black Redstarts is considered in the assessment of planning applications.
- To provide suitable nest sites for Black Redstarts in areas where open mosaic habitats are created or retained. **[Target: 10 sites]**

<sup>40</sup> [Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora](#)

<sup>41</sup> [Wildlife and Countryside Act 1981 \(as amended\)](#)



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### 3.2.5 Common Tern

Common Terns have nested in Tower Hamlets on rafts provided for them in the docks since the 1990s. The population has declined in recent years due to deterioration and removal of old rafts, and silt accumulation in East India Dock Basin. No successful breeding took place in 2016-18. There is plenty of good feeding habitat along rivers, canals, and in the docks, but as a breeding species in the borough, Common Terns are wholly reliant on the provision of artificial floating nest sites, ideally shingle-covered rafts.



#### Objectives for Common Tern

- To ensure that, where new developments reduce the value of an existing breeding site for Common Terns, this is compensated for by the provision of rafts in suitable places nearby.
- To increase the available nesting habitat for Common Terns through the provision of rafts on suitable water bodies. **[Target: 100m<sup>2</sup> of rafts or 10 rafts]**

### 3.2.6 House Martin

The House Martin has declined markedly as a breeding bird in Tower Hamlets in recent years, as it has across London and nationally. The main reason for the decline is probably a decrease in flying insects, perhaps coupled with changes on its migration routes or wintering grounds. This is best addressed through general improvements to wildlife habitats of all types. As it nests on buildings, nest sites are not a limiting factor. However, as a communal breeder, House Martins can be encouraged to nest by leaving old nests or installing artificial House Martin nests on walls.



#### Objectives for House Martin

- To encourage new House Martin colonies by installing artificial nests on suitable buildings. **[Target: 5 sites]**

### 3.2.7 House Sparrow

The House Sparrow, often regarded as a symbol of London (the “cockney sparrer”), has declined hugely across London in the last 20 or so years, disappearing from large areas. Its current distribution in Tower Hamlets is patchy, but it remains common in some parts of the borough. The reasons for the decline remain unknown despite extensive research, but may include habitat loss, pollution, predation and possibly disease. There is some evidence that the decline has halted, and that sparrows are returning to some places where they had disappeared. Because the reasons for the decline are not understood, it is not clear how best to help sparrow conservation. Nevertheless, general habitat improvements in gardens and parks, which increase the availability of seeds and insects for food, and cover for nesting, might help and will certainly help other birds. Specific interventions for House



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Sparrows involve creating suitable nest sites, either through erecting nest boxes or providing dense climbing plants growing up walls.

### Objectives for House Sparrow

- To increase the availability of nest sites for House Sparrows by installing sparrow terrace nest boxes or growing dense climbers on walls. **[Target: 30 sites]**

### 3.2.8 Kingfisher

The Kingfisher is a winter visitor to Tower Hamlets' waterways and docks, but does not currently breed in the borough. A lack of suitable nest sites is probably the main factor preventing Kingfishers from nesting here. Providing artificial nesting banks for Kingfishers in undisturbed waterside locations, including within new waterside developments, would encourage nesting. Nesting banks have recently been constructed beside the Regent's Canal in Limehouse and beside Bow Creek at London City Island.



The Kingfisher is strictly protected under Schedule 1 of the Wildlife & Countryside Act 1981<sup>42</sup>.

### Objectives for Kingfisher

- To increase the availability of nest sites for Kingfishers by providing artificial nesting banks in appropriate waterside locations. **[Target: 1 site]**

### 3.2.9 Peregrine

The Peregrine, the fastest animal in the world, has successfully colonised London over the last 15 years, nesting on tall buildings. Up to three pairs nest in Tower Hamlets, which is probably the maximum number of territories the area will support. Breeding success has not always been good, due to disturbance or poor nest sites. The provision of nest boxes in undisturbed parts of roofs on existing or new tall buildings could significantly increase the success of Peregrines in the borough.



Several such boxes have recently been installed. The Peregrine is strictly protected under Schedule 1 of the Wildlife & Countryside Act 1981<sup>43</sup>.

### Objectives for Peregrine

- To increase the availability of nest sites for Peregrines by providing nest boxes on tall buildings. **[Target: 2 sites]**

### 3.2.10 Sand Martin

A few pairs of Sand Martins nest in drainage holes in the walls of canals and docks across the borough. Sand Martins respond well to the provision of artificial nesting banks in suitable places, especially near water. The provision of artificial banks could significantly increase the population of Sand Martins in the borough.



<sup>42</sup> [Wildlife and Countryside Act 1981 \(as amended\)](#)

<sup>43</sup> [Wildlife and Countryside Act 1981 \(as amended\)](#)

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### Objectives for Sand Martin

- To increase the availability of nest sites for Sand Martins by providing artificial nesting banks in suitable locations. **[Target: 1 site]**

#### 3.2.11 Swift

Swifts have declined across Britain in recent years, and one of the reasons is probably a lack of suitable nest sites in modern buildings. Nest boxes for Swifts can easily be installed on buildings, or incorporated into the design of new buildings. Being colonial nesters, Swifts can be encouraged to use nest boxes by playing recordings of their calls from the buildings where the boxes are sited.



### Objectives for Swift

- To increase the availability of nest sites for Swifts by providing nest boxes on suitable buildings, including in new developments. **[Target: 20 sites]**

#### 3.2.12 Amphibians

Four species of native amphibians occur in Tower Hamlets. The Common Frog and Smooth Newt are fairly common and widespread, the Common Toad occurs in a few places, and there is one population of Great Crested Newts resulting from a deliberate introduction in the Spitalfields area. Amphibians breed in ponds, but spend much of the rest of their lives on land. Conserving our existing ponds and creating new ones will help amphibians, but it is crucial that ponds are surrounded by suitable terrestrial habitat which provides cover and food. The Great Crested Newt is strictly protected under the European Union Habitats Directive<sup>44</sup> and is a priority species in England and London. The Common Toad is a priority species in England.



### Objectives for amphibians

- To ensure that existing and new ponds are connected with suitable terrestrial habitat for amphibians. **[No specific target]**

#### 3.2.13 European Eel

The Eel has declined hugely in Britain in recent years. It has a complex life history, breeding in the sea and spending most of its life in freshwater. One of the likely reasons for its decline is an increase in structures which block migration along waterways. Actions which enhance habitat and water quality in our rivers and canals will benefit Eels. Specific action is required to maintain and improve the ability of Eels to migrate. Old Ford Lock is the most significant known barrier in Tower Hamlets which would benefit from an Eel pass. The entrances to marinas such as Limehouse Basin and St Katharine's Docks may also be barriers.



<sup>44</sup> [Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora](#)

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### Objectives for Eel

- To ensure Eel migration is considered when assessing any new structures in watercourses.
- To assist Eel migration by installing Eel passes to existing barriers to migration. **[Target: 1 site]**

#### **3.2.14 Brimstone butterfly**

The Brimstone is a fairly common and widespread butterfly in Tower Hamlets, but its caterpillar food plants, Common Buckthorn and Alder Buckthorn, are quite rare, except in Tower Hamlets Cemetery Park, where both buckthorns have been extensively planted, and where the butterfly consequently has a high population. Common (or Purging) Buckthorn is a sizeable shrub which likes fairly dry conditions, while Alder Buckthorn is a smaller shrub which likes damp soils. As adult Brimstones range over a wide area, they are quick to take advantage of buckthorns wherever they are planted. Common Buckthorn is a good plant for a mixed hedge. Brimstone early stages are on it between April and July. The shrub can be trimmed at any other time. Sea Buckthorn, sometimes used in landscaping, is not a Brimstone caterpillar food plant.



### Objectives for Brimstone

- To increase the resource of food plants for caterpillars of the Brimstone butterfly by planting Common Buckthorn and Alder Buckthorn in suitable places, including parks, schools, housing estates and community gardens. **[Target: 15 sites]**

#### **3.2.15 Wild bees (bumblebees and solitary bees)**

Wild bees are in serious decline throughout Britain, and indeed all over the world, due largely to habitat loss and pesticides. Bees are vitally important as pollinators of food crops. Wild bees have been chosen as priority species in Tower Hamlets as a proxy for all pollinating insects, which include domestic Honey Bees, flies, butterflies and beetles. Action for wild bees will benefit other pollinators, too. Many common species of bumblebees and solitary bees will take nectar from a wide range of flowers wherever they can find it. The best way to help them is to plant more nectar-rich flowers in parks, gardens and the built environment. Tower Hamlets also supports important populations of several less common bees, including the Brown-banded Carder Bee (*Bombus humilis*), Black Mining Bee (*Andrena pilipes*), Red-girdled Mining Bee (*Andrena labiata*) and Clover Blunthorn Bee (*Melitta leporine*). Some of these scarcer species have more specific requirements, such as particular species of flowers. Other solitary bees, such as the Fork-tailed Flower Bee (*Anthophora furcata*) and yellow-faced bees (*Hylaeus* species), make their nests in decaying wood, and will benefit from the provision of log piles and standing dead wood. More information about wild bees in Tower Hamlets can be found on the Tower Habitats website<sup>45</sup>. The Brown-banded Carder Bee is a priority species for England and London.



<sup>45</sup> [Link to be added when page is live on the website](#)

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### Objectives for wild bees

- To increase the food resource for bumblebees and other pollinators by planting nectar-rich flowers in parks, gardens (including community gardens) and the built environment, including growing ivy on suitable structures in sunny places. **[Target: 100 sites]**
- To increase nesting sites for bumblebees by installing bee boxes or insect hotels in suitable places. **[Target: 20 sites]**
- To increase the available habitat for solitary bees and other deadwood invertebrates by creating loggeries in parks, housing estates and community gardens. **[Target: 20 sites]**

### **3.2.16 Streaked Bombardier Beetle**

The Streaked Bombardier Beetle is extremely rare in Britain. It has been found on only a handful of sites in recent years, all of them in East London, and is thought to survive on only one of these. It was found in Mile End Park in 2010, but appears to have been lost because the site became too overgrown. This site has recently been restored. The beetle is associated with brownfield sites, favouring sparse vegetation with plenty of bare, stony ground. It will benefit from actions which increase open mosaic habitats. Specific targeted actions are to ensure that its potential presence is considered when sites with suitable habitat are the subject of planning applications, and to create areas of bare ground with stones and rocks as part of open mosaic habitats.



### Objectives for Streaked Bombardier Beetle

- To ensure that the redevelopment of sites which contain suitable habitat for the Streaked Bombardier Beetle takes account of the possible presence of this rare species.

### **3.2.17 Black Poplar**

The Black Poplar is Britain's rarest native timber tree. It has an historical association with Tower Hamlets, as it is the origin of the place name Poplar. There are now very few mature Black Poplars remaining in the borough. These are all of a similar age, and several of them in Meath Gardens and Victoria Park have died in the last few years. For a number of reasons, Black Poplars no longer reproduce naturally in Britain, and the conservation of the species therefore depends on planting. The vast majority of Black Poplars in Britain belong to a fairly small number of genetically identical clones, each clone having originated as cuttings from a single tree. Planting the rarer clones to preserve genetic diversity is particularly important. The Black Poplar is a large tree which is best planted well away from buildings.



### Objectives for Black Poplar

- To protect and manage our existing Black Poplars to maximise their lifespan.
- To plant Black Poplars, especially those belonging to rare clones, in suitable places in parks and housing amenity land. **[Target: 25 trees]**

## DRAFT

### 3.2.18 Jersey Cudweed

Jersey Cudweed is a rare plant in Britain and is protected under Schedule 8 of the Wildlife & Countryside Act 1981<sup>46</sup>. It grows in dry, open places. It has been found in recent years on bare ground and in paving cracks in several places in the borough, including Poplar Dock Marina, Millwall Inner Dock, Silvocea Way, Ben Johnson Lock and St Katharine's Dock. Although these populations are highly unlikely to be of native origin, the protection still applies.



#### Objectives for Jersey Cudweed

- To ensure the known populations of Jersey Cudweed in the borough are protected or, where this is not possible, their loss is appropriately mitigated.
- To ensure that development sites with suitable habitat are surveyed for Jersey Cudweed so that it can be properly considered in assessing planning applications.

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<sup>46</sup> [Wildlife and Countryside Act 1981 \(as amended\)](#)

## 4 The action plans

### Built Environment Action Plan

#### Introduction

Tower Hamlets is a densely built-up borough, and over one third of its area is occupied by buildings, streets and car parks. The built environment can be surprisingly rich in wildlife. Buildings provide roosts for bats, and nest sites for birds which more traditionally nest on cliffs. These include the spectacular Peregrine Falcon and the rare Black Redstart. There is also an increasing population of Herring and Lesser Black-backed Gulls, the former a species of conservation concern in England as it is in serious decline in its traditional coastal haunts.

We can enhance the built environment for wildlife in many ways. Green roofs are the easiest place to replace our disappearing brownfield (open mosaic) habitats. Buildings can be enhanced for bats and birds by providing custom-designed nesting and roosting sites, either built into the fabric of new buildings or retrofitted to existing ones. Climbers and other forms of green walls can provide nectar for bees and nesting sites for our declining House Sparrows. And streets can be greened with trees, hedges and planters full of nectar-rich flowers.



Biodiverse green roof on the Soanes Centre, Tower Hamlets Cemetery Park

# DRAFT

## **Priority habitats**

Open mosaic habitats

## **Priority species**

Bats

Black Redstart

House Martin

House Sparrow

Peregrine

Swift

Brimstone butterfly

Wild bees

Streaked Bombardier Beetle

Jersey Cudweed

## **How we will achieve the objectives and targets for these habitats and species**

### Tower Hamlets Council will:

Ensure that potential harm to these species and habitats, particularly the Streaked Bombardier Beetle and Jersey Cudweed, which might otherwise be overlooked, is given due consideration in the assessment of planning applications;

Require biodiversity enhancements which contribute to these objectives and targets in new developments through the planning process;

Ensure that the Council's own housing developments include biodiversity enhancements which contribute to these objectives and targets, and serve as examples of good practice to other developers;

Work with Tower Hamlets Homes and social housing providers to identify suitable buildings for retrofitting biodiverse green roofs and identify funding sources to implement these;

Create sustainable urban drainage schemes in streets and include planting which contributes to these targets;

Ensure that Green Grid projects in the built environment contribute to these targets wherever possible.

### Tower Hamlets Homes and other social housing providers can:

Include biodiverse green roofs which meet the definition of open mosaic habitats in all new build and estate regeneration schemes;

Retrofit biodiverse green roofs which meet the definition of open mosaic habitats on existing buildings;

Grow ivy and other nectar-rich climbers up suitable walls;

Install planters with nectar-rich flowers and/or plant nectar-rich flowers in existing neglected planters;

Install bat boxes, bumblebee boxes and nest boxes for Peregrines, Swifts, House Sparrows, House Martins and other birds in appropriate places on buildings;

Avoid removing old House Martin nests from buildings.



## DRAFT

Canary Wharf Group will (subject to construction programmes staying on track):

Install 13 black redstart nest boxes, 13 sparrow boxes, 10 swift boxes and 2 bat boxes within developments at Wood Wharf and 1 Bank Street;

Install eight new biodiverse roofs.

Developers will be required to provide biodiversity enhancements which could include:

Installing biodiverse green roofs which meet the definition of open mosaic habitats on all new development;

Installing living walls with nectar-rich climbers in new development;

Providing planters with nectar-rich flowers in new development;

Incorporating roost sites for bats and nest sites for Swifts within the design of new buildings;

Installing nest boxes for Peregrines, House Sparrows, House Martins and Black Redstarts in appropriate places on new buildings.

Residents can:

Grow nectar-rich flowers in window boxes;

Avoid removing old House Martin nests from buildings;

Install bat boxes, bumblebee boxes and nest boxes for House Sparrows and other birds in appropriate places on buildings;

Grow nectar-rich climbers such as ivy, honeysuckle and jasmine up walls.

**How we will raise awareness of biodiversity in the built environment**

The Tower Habitats biodiversity partnership will:

Provide news and information on design for biodiversity on the Tower Habitats website;

Organise visits to examples of best practice for planners, developers and other professionals.

# DRAFT

## Gardens & Grounds Action Plan

### Introduction

Almost 40% of the area of Tower Hamlets is occupied by gardens and the landscaped areas around housing estates, schools, businesses and other premises. By far the majority of this is housing amenity land. In the last few years, social housing providers and residents in Tower Hamlets have created some excellent wildlife habitats, such as meadows, copses, hedges, orchards and nectar-rich community and communal gardens, around housing estates. The Mayor has pledged to increase the number of planting projects on estates.

Many schools have also created wildlife gardens, which are wonderful educational resources. Private gardens, too, can be havens for wildlife, supporting a wealth of birds and insects, as well as amphibians if there is a pond nearby. Private gardens may also be the last refuge for our disappearing population of Hedgehogs.

Landscaping around industrial premises may not need to look too “tidy” all the time, and often doesn’t have a recreational function. This offers an opportunity to retain or create at ground level the open mosaic habitats which are disappearing as brownfield sites are developed, and are increasingly being restricted to green roofs.



Winterton House Organic Garden has lots of nectar-rich flowers for bees

# DRAFT

## **Priority habitats**

Flower-rich grassland  
Open mosaic habitats  
Native broadleaved woodland  
Orchards  
Mixed native hedgerows  
Ponds

## **Priority species**

Bats  
Hedgehog  
House Sparrow  
Amphibians  
Brimstone butterfly  
Wild bees  
Black Poplar

## **How we will achieve the objectives and targets for these habitats and species**

### Tower Hamlets Council will:

Seek biodiversity enhancements which contribute to these targets in the landscaping of all new developments;

Provide free wildflower seeds to residents, schools and community groups;

Ensure that community gardens created or enhanced through its Community Volunteering scheme include features which contribute to the objectives and targets in the LBAP;

Support existing community gardens to make improvements to encourage biodiversity, including providing technical advice and assisting in finding funding;

Work with Tower Hamlets Homes and social housing providers to advise on managing their land for biodiversity, identify enhancement projects and help to find funding sources to implement these.

### Schools can:

Create meadows, orchards, ponds and hedges within their grounds;

Install bat boxes and nest boxes for birds and bumblebees;

Plant common or alder buckthorns and other food plants for butterfly caterpillars;

Plant native trees, preferably of at least three species;

Plant nectar-rich flowers to provide food for wild bees and other insects;

Create loggeries and insect hotels.

### The Tower Hill Trust will:

Provide grants to schools and community groups for enhancements to school grounds and community gardens which contribute towards the objectives and targets in the LBAP over the next five years, grants will continue to be awarded on a case by case basis.

## DRAFT

### Tower Hamlets Homes and other social housing providers (and groups of residents managing community gardens) can:

Note: all of these can be included within estate regeneration schemes, but most of them can also be done in existing amenity space and community and communal gardens.

Record, protect and appropriately manage the priority habitats and features of value to priority species which already exist on their estates;

Create wildlife habitats such as meadows, small areas of woodland, orchards, and hedges within the landscaping around estates, and enhance any existing habitats;

Install bat boxes, nest boxes for birds, bee boxes and hedgehog homes in suitable places on estates;

Create loggeries and insect hotels;

Plant common or alder buckthorns and other food plants for butterfly caterpillars;

Plant native trees, preferably at least three species on a site;

Plant nectar-rich flowers to provide food for wild bees and other insects;

Plant Black Poplars in suitable sites away from buildings and paths.

### Developers will be required to provide biodiversity enhancements which could include:

Creating wildlife habitats such as meadows, small areas of woodland, orchards and mixed native hedges within the landscaping around developments;

Creating open mosaic habitat within the landscaping around industrial developments;

Installing bat boxes, nest boxes for birds, bumblebee boxes and hedgehog homes in suitable places within the landscaping around developments;

Ensuring that lighting of new development (during construction and operation) does not adversely impact on foraging bats;

Creating loggeries and insect hotels within the landscaping around developments;

Planting common or alder buckthorns and other food plants for butterfly caterpillars within the landscaping around developments;

Planting native trees, preferably at least three species on a site;

Planting nectar-rich flowers to provide food for wild bees and other insects, within the landscaping around developments.

### Residents can:

Create wildlife ponds and small meadows in their gardens;

Plant mixed native hedges including common or alder buckthorns;

Plant flowering shrubs, annuals and perennials in gardens to provide a year-round nectar source for bees and other insects;

Install bird and bat boxes, hedgehog homes, bee boxes, insect hotels, loggeries and other habitat features in gardens;

Ensure garden fences have gaps or holes which allow hedgehogs to pass between gardens.

## DRAFT

### **How we will raise awareness of biodiversity in gardens**

#### The Tower Habitats biodiversity partnership will:

Provide news and information on wildlife gardening and landscaping for wildlife on the Tower Habitats website.

#### Tower Hamlets Council will:

Seek to facilitate the creation of training programmes which will provide opportunities for people, including residents, staff of local landlords and others, to better understand how gardens and grounds can be developed and managed to promote biodiversity.

#### Tower Hamlets Homes and other social housing providers can:

Encourage residents to get involved in improving their estates for wildlife with events such as community planting days;

Provide information about local wildlife and events in newsletters and on noticeboards.

#### Tower Hamlets Food Growing Network will (subject to funding being available):

Organise training for local food growers and garden leads on improving biodiversity in community gardens.

#### The Friends of Tower Hamlets Cemetery Park will (subject to funding being available):

Support the interest of social housing providers to help them realise their wildlife and biodiversity aspirations on estates;

Take initiatives to enable residents and community groups to raise biodiversity awareness and support practical biodiversity initiatives in their local areas.

# DRAFT

## Rivers & Standing Water Action Plan

### Introduction

Almost 15% of Tower Hamlets is covered by water, almost certainly the highest proportion of any London borough. This is a result of a very long Thames frontage around the south of the borough, and the large open water spaces of the docks. There is also a section of the tidal Lea, over 8 kilometres of canal and numerous small water bodies. The rivers and canals have rather little marginal vegetation, and suffer at times from poor water quality and invasive non-native species. They nevertheless support fish, aquatic birds and invertebrates, with a few scarce plants in the canals. The docks have limited habitats, but can hold large numbers of waterfowl in hard weather when most fresh waters are frozen. The ponds are important for amphibians, including a small introduced population of the protected Great Crested Newt in Spitalfields.

Water quality can be enhanced through getting rid of sewer misconnections, and through sustainable urban drainage systems (SUDS) reducing surface water runoff into rivers. The priorities for biodiversity action are to diversify the habitats in the waterways and docks, control invasive species, and increase the number of ponds.



East India Dock Basin Nature Reserve is one of the best wetlands in the borough

# DRAFT

## **Priority habitats**

Rivers  
Standing open water (Canals & docks)  
Ponds  
Reed beds

## **Priority species**

Bats  
Otter  
Common Tern  
Kingfisher  
Sand Martin  
Amphibians  
European Eel

## **How we will achieve the objectives and targets for these habitats and species**

### Tower Hamlets Council will:

Seek enhancements to canals, rivers and docks which contribute to these targets through new development on adjacent sites;

Work with the Canal & River Trust and other stakeholders to seek funding for enhancements to waterways and docks which contribute to these targets;

Create new ponds in parks where appropriate;

### Schools can:

Create wildlife ponds in their school grounds.

### Thames21 will:

Manage existing reed beds in the Lea Navigation to maintain and enhance their biodiversity value;

Seek funding for and create new reed beds in the Lea Navigation and Limehouse Cut.

### The Canal & River Trust will:

Control and seek to eradicate invasive plant species in canals;

Enhance canals and docks by installing vegetated rafts and/or gabion baskets;

Identify suitable locations in the Regent's Canal and Lea Navigation for habitat creation and enhancement, and seek funding to facilitate these.

### The Lower Regents Coalition will:

Continue to create and enhance habitats in and around the Regent's Canal.

### Lee Valley Park will:

Seek to enhance habitats at East India Dock Basin, including de-silting of the basin to provide increased open water, and replacing or refurbishing the tern rafts when desilting allows safe boat access to the basin.

### Canary Wharf Group will (subject to construction programmes staying on track):

Install 90 square metres of tern rafts in the West India and/or Millwall Docks;

Install a wall designed to provide habitat for fish in the dock beside the 1 Bank Street development.

## DRAFT

### Developers can:

Create ponds with wildlife value (as opposed to purely ornamental water features) within landscape schemes for housing or commercial developments;

Fit vegetated gabion baskets to walls of rivers, canals or docks within or adjacent to their development sites;

Install vegetated rafts in docks within or adjacent to their development sites;

Install tern rafts in docks within or adjacent to their development sites;

Create nest sites for Kingfishers and Sand Martins, and artificial Otter holts, in appropriate places in waterside developments;

Eradicate invasive plants from water bodies within or adjacent to their development sites.

### **How we will raise awareness of biodiversity in rivers and docks**

#### The Tower Habitats biodiversity partnership will:

Provide news and information on wildlife and events along waterways on the Tower Habitats website.

#### Thames21 will:

Run training courses for people wishing to help look after and enhance their local waterways.

#### The Lower Regents Coalition will:

Continue to promote the importance of canals through their regular volunteer litter clean-ups on and around the Regent's Canal and Limehouse Cut.



## DRAFT

### Parks, Squares & Burial Grounds Action Plan

#### Introduction

About 13% of the borough is made up of parks and other public open space. These include sizeable areas of high quality wildlife habitats in Mudchute, Tower Hamlets Cemetery and Mile End Parks, all of which are Sites of Metropolitan Importance for Nature Conservation. Many other parks also contain valuable habitats, but there is plenty of scope for further habitat creation and enhancement.

There are plenty of parks where new meadows, orchards and hedges can be created, as well as increasing the amount of nectar-rich flowers and native trees. Suitable locations for new woodland, open mosaic habitats and ponds are more limited, but opportunities may be found to create these habitats. Parks also represent the best opportunity to increase the borough's population of Black Poplars.



A guided walk in Mile End Park

## DRAFT

### **Priority habitats**

Flower-rich grassland  
Open mosaic habitats  
Native broadleaved woodland  
Orchards  
Mixed native hedgerows  
Ponds

### **Priority species**

Bats  
Hedgehog  
House Sparrow  
Amphibians  
Black Poplar  
Brimstone butterfly  
Wild bees  
Streaked Bombardier Beetle

### **How we will achieve the objectives and targets for these habitats and species**

#### Tower Hamlets Council will:

Manage existing wildlife habitats in parks to maintain and, where appropriate, enhance their biodiversity value;

Identify appropriate locations to create and enhance priority habitats in its parks;

Seek funding from a variety of sources to implement the enhancements identified;

Collaborate on fund-raising with third sector groups managing public open spaces;

Ensure biodiversity is considered in all capital schemes in parks, and biodiversity enhancements which contribute to these targets are included where possible;

Continue to monitor spiders and beetles in Mile End Park to assess the effectiveness of habitat management;

Ensure through the development management process that parks in new developments include wildlife habitats which contribute to these targets.

#### The Friends of Tower Hamlets Cemetery Park will:

Manage existing wildlife habitats in Tower Hamlets Cemetery Park to maintain and, where appropriate, enhance their biodiversity value;

Monitor wild bee populations in Cemetery Park and substantially increase populations of nectar-rich flowers for bees, in woodland and meadow habitats;

Continue to monitor spiders, beetles and butterflies in Cemetery Park, and extend the monitoring to other groups of plants and animals (e.g. hoverflies) if capacity allows.

#### The Mudchute Association will:

Manage existing wildlife habitats at Mudchute to maintain and, where appropriate, enhance their biodiversity value;

Seek opportunities to restore flower-rich grassland, including calcareous grassland, at Mudchute where this habitat has been invaded in recent years by coarse vegetation, bramble and scrub.

## DRAFT

### The Friends of Meath Gardens will:

Continue to create and enhance wildlife habitats in Meath Gardens.

### Residents can:

Volunteer for conservation work at Tower Hamlets Cemetery Park, Mudchute, Victoria Park or Mile End Park.

### **How we will raise awareness of biodiversity in parks**

#### The Tower Habitats biodiversity partnership will:

Provide news and information on wildlife and events in parks on the Tower Habitats website.

#### Tower Hamlets Council will:

Run a programme of wildlife-related events in parks;

Seek to facilitate the creation of training programmes which will enable parks staff, and others, to learn new skills relevant to managing and developing for biodiversity in public open spaces.

#### The Friends of Tower Hamlets Cemetery Park will:

Run a programme of wildlife-related events at Tower Hamlets Cemetery Park;

Take a proactive role in the provision of biodiversity training;

Continue to support the schools environmental education programmes in the Soanes Centre and develop other initiatives such as Forest Schools.

#### The Mudchute Association will:

Run wildlife-related events at Mudchute;

Maintain regular features on Mudchute's wildlife on the website and blog;

Work with schools to provide opportunities for environmental education at Mudchute.

### Residents can:

Monitor wildlife in their local park and report sightings to the Biodiversity Officer.

# DRAFT

## References

- [Biodiversity 2020: A strategy for England's wildlife and ecosystem services](#) (DEFRA 2011)
- [Canary Wharf Group Biodiversity Action Plan 2018-2028](#) (Canary Wharf Group 2018)
- [Core Strategy Development Plan Document](#) (LB Tower Hamlets 2010)
- [Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora](#)
- [Creating green roofs for invertebrates: a best practice guide](#) (Buglife)
- [Estuary Edges](#) (Environment Agency/Thames Estuary Partnership)
- [Guidance Note 8: Bats and artificial lighting](#) (Institution of Lighting Professionals 2018)
- [Habitats and Species of Principal Importance in England](#) (Secretary of State for Environment, Farming & Rural Affairs 2010)
- [Lee Valley Regional Park Biodiversity Action Plan 2019-2029 \(LVRPA 2019\) \(link to be added\)](#)
- [Legacy Communities Scheme Biodiversity Action Plan 2014-2019](#) (London Legacy Development Corporation 2013)
- [London Borough of Tower Hamlets Air Quality Action Plan 2017-2022](#) (LB Tower Hamlets 2017)
- [London Borough of Tower Hamlets – SuDS Guidance](#) (LB Tower Hamlets 2014)
- [London's BAP priority habitats](#) (London Biodiversity Partnership)
- [London's BAP priority species](#) (London Biodiversity Partnership)
- [London Environment Strategy](#) (Mayor of London 2018)
- [Managing Development Document Development Plan Document](#) (LB Tower Hamlets 2013)
- [Natural Environment and Rural Communities Act 2006](#)
- [Parks & Open Spaces: An open space strategy for The London Borough of Tower Hamlets 2017-2027](#) (LB Tower Hamlets 2017)
- Tower Habitats website [www.towerhabitats.org](http://www.towerhabitats.org)
- [Tower Hamlets Council website Biodiversity page](#)
- [Tower Hamlets Local Plan 2031 latest version](#) (LB Tower Hamlets 2018)
- [Tower Hamlets Green Grid Strategy: Update 2017](#) (LB Tower Hamlets 2017)
- [Wildlife and Countryside Act 1981 \(as amended\)](#)

# Equality Analysis (EA)

Financial Year  
**2019/20**

## Section 1 – General Information (Aims and Objectives)

Name of the proposal including aims, objectives and purpose

*(Please note – for the purpose of this doc, 'proposal' refers to a policy, function, strategy or project)*

### **Tower Hamlets Local Biodiversity Action Plan**

Identifies priorities for biodiversity conservation in the borough for the period 2019-24, setting objectives and targets for important habitats and species. Sets out what different stakeholders, including the Council, social housing providers, developers, community groups, businesses and residents, can do to help achieve the objectives and targets.

See  
**Appendix A**

Current decision  
rating



### **Conclusion - To be completed at the end of the Equality Analysis process**

*(the exec summary will provide an update on the findings of the EA and what outcome there has been as a result. For example, based on the findings of the EA, the proposal was rejected as the impact on a particular group was unreasonable and did not give due regard. Or, based on the EA, the proposal was amended and alternative steps taken)*

There is nothing in the Local Biodiversity Action Plan which would adversely impact on any equalities target group. All sections of the community can benefit from enhanced biodiversity and more attractive green spaces, and it encourages community participation and thus helps community cohesion.

**Name:** Abdul J Khan  
(signed off by)

**Date signed off:**  
(approved)

Service area:  
Strategy, Regeneration & Sustainability

Team name:  
Sustainable Development Team

Service manager:  
Mark Baigent

Name and role of the officer completing the EA:  
John Archer, Biodiversity Officer

## Section 2 – Evidence (Consideration of Data and Information)

What initial evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

Several studies published in the last few years clearly demonstrate that contact with nature and access to natural green spaces is beneficial to people's physical and mental health and wellbeing. Therefore the default position, before any differential impacts on protected groups are considered, is that more attractive, biodiverse open spaces have the potential to benefit all sections of the community.

### Section 3 – Assessing the Impacts on the 9 Groups

Please refer to the guidance notes below and evidence how you're proposal impact upon the nine Protected Characteristics in the table on page 3?

**For the nine protected characteristics detailed in the table below please consider:-**

- **What is the equality profile of service users or beneficiaries that will or are likely to be affected?**

Use the Council's approved diversity monitoring categories and provide data by target group of users or beneficiaries to determine whether the service user profile reflects the local population or relevant target group or if there is over or under representation of these groups

- **What qualitative or quantitative data do we have?**

List all examples of quantitative and qualitative data available  
(include information where appropriate from other directorates, Census 2001 etc)

- *Data trends – how does current practice ensure equality*

- **Equalities profile of staff?**

Indicate profile by target groups and assess relevance to policy aims and objectives e.g. Workforce to Reflect the Community. Identify staff responsible for delivering the service including where they are not directly employed by the council.

- **Barriers?**

What are the potential or known barriers to participation for the different equality target groups? Eg- communication, access, locality etc.

- **Recent consultation exercises carried out?**

Detail consultation with relevant interest groups, other public bodies, voluntary organisations, community groups, trade unions, focus groups and other groups, surveys and questionnaires undertaken etc. Focus in particular on the findings of views expressed by the equality target groups. Such consultation exercises should be appropriate and proportionate and may range from assembling focus groups to a one to one meeting.

- **Additional factors which may influence disproportionate or adverse impact?**

Management Arrangements - How is the Service managed, are there any management arrangements which may have a disproportionate impact on the equality target groups

- **The Process of Service Delivery?**

In particular look at the arrangements for the service being provided including opening times, custom and practice, awareness of the service to local people, communication

Please also consider how the proposal will impact upon the 3 One Tower Hamlets objectives:-

- Reduce inequalities
- Ensure strong community cohesion
- Strengthen community leadership.

**Please Note -**

Reports/stats/data can be added as Appendix

Target Groups	Impact – Positive or Adverse	Reason(s)
Race	Positive	<p>No racial group will suffer adverse impacts from the proposals in the LBAP, and people of all races can potentially enjoy the health benefits of access to nature and more attractive, biodiverse open spaces. There has for many years been a perception that biodiversity conservation is a white, middle-class interest. In Tower Hamlets we have been working hard to dispel this myth and, particularly through working with groups involved in food-growing, have been able to reach a diverse racial audience.</p>
Disability	Positive	<p>Enhancing biodiversity in open spaces has no adverse impact on accessibility, and where possible projects will improve access. Enhancing biodiversity in open spaces can significantly enhance the experience of disabled people visiting these spaces. For example, bee-friendly planting can be in the form of a sensory garden, using plants which are interesting to smell and touch, designed specifically for the enjoyment of blind people. An increase in birdsong may also be particularly enjoyed by people with limited vision.</p> <p>Biodiversity enhancements that involve tree and shrub planting have the potential, if poorly designed or sited, to provide cover where people could hide. This could reduce safety for users of an open space, or at least the perception of safety, which is sufficient to deter people from using an open space. Disabled people may be particularly vulnerable in this respect. The location and design of all projects involving tree and shrub planting will ensure that the safety and security of site users is fully safeguarded. Conversely, the LBAP encourages community participation in creating more attractive open spaces. This will lead to greater legitimate use of the space, which will discourage crime and anti-social behaviour and hence improve perceptions of safety.</p>
Gender	No differential impact	<p>Both men and women enjoy the health benefits of access to nature and more attractive, biodiverse open spaces. There is roughly equal gender representation in participation in biodiversity conservation at all levels, including visiting nature reserves, membership of environmental organisations and working as professional ecologists.</p>

		Biodiversity enhancements that involve tree and shrub planting have the potential, if poorly designed or sited, to provide cover where people could hide. This could reduce safety for users of an open space, or at least the perception of safety, which is sufficient to deter people from using an open space. Women may be particularly vulnerable in this respect. The location and design of all projects involving tree and shrub planting will ensure that the safety and security of site users is fully safeguarded. Conversely, the LBAP encourages community participation in creating more attractive open spaces. This will lead to greater legitimate use of the space, which will discourage crime and anti-social behaviour and hence improve perceptions of safety.
Gender Reassignment	No differential impact	Biodiversity enhancements that involve tree and shrub planting have the potential, if poorly designed or sited, to provide cover where people could hide. This could reduce safety for users of an open space, or at least the perception of safety, which is sufficient to deter people from using an open space. Gender-reassigned people may be particularly vulnerable in this respect. The location and design of all projects involving tree and shrub planting will ensure that the safety and security of site users is fully safeguarded. Conversely, the LBAP encourages community participation in creating more attractive open spaces. This will lead to greater legitimate use of the space, which will discourage crime and anti-social behaviour and hence improve perceptions of safety.
Sexual Orientation	No differential impact	<p>People of all sexual orientations can enjoy the health benefits of access to nature and more attractive, biodiverse open spaces.</p> <p>Biodiversity enhancements that involve tree and shrub planting have the potential, if poorly designed or sited, to provide cover where people could hide. This could reduce safety for users of an open space, or at least the perception of safety, which is sufficient to deter people from using an open space. LGBT people may be particularly vulnerable in this respect. The location and design of all projects involving tree and shrub planting will ensure that the safety and security of site users is fully safeguarded. Conversely, the LBAP encourages community participation in creating more attractive open spaces. This will lead to greater legitimate use of the space, which will discourage crime and anti-social behaviour and hence improve perceptions of safety.</p>
Religion or Belief	Positive	No religion or faith group will suffer adverse impacts from the proposals in the LBAP, and it contains nothing which would be contrary to the teachings of any religion. Most religions include some degree of belief that nature is important and should be looked after.
Age	Positive	People of all ages can enjoy the health benefits of access to nature and more attractive, biodiverse open spaces. Older people may have more limited ability or opportunity than other sections of the community to travel long distances to enjoy nature, and so particularly benefit from having natural spaces close to home.



		Biodiversity enhancements that involve tree and shrub planting have the potential, if poorly designed or sited, to provide cover where people could hide. This could reduce safety for users of an open space, or at least the perception of safety, which is sufficient to deter people from using an open space. Older people and children may be particularly vulnerable in this respect. The location and design of all projects involving tree and shrub planting will ensure that the safety and security of site users is fully safeguarded. Conversely, the LBAP encourages community participation in creating more attractive open spaces. This will lead to greater legitimate use of the space, which will discourage crime and anti-social behaviour and hence improve perceptions of safety.
Marriage and Civil Partnerships.	No differential impact	People can enjoy the health benefits of access to nature and more attractive, biodiverse open spaces regardless of relationship status. There is no reason to think the proposals in the LBAP would have any differential impact in relation to this characteristic.
Pregnancy and Maternity	Positive	<p>Pregnant women and mothers with young children may have more limited ability or opportunity than other sections of the community to travel long distances to enjoy nature, and so particularly benefit from having natural spaces close to home.</p> <p>Biodiversity enhancements that involve tree and shrub planting have the potential, if poorly designed or sited, to provide cover where people could hide. This could reduce safety for users of an open space, or at least the perception of safety, which is sufficient to deter people from using an open space. Pregnant women and mothers with young children may be particularly vulnerable in this respect. The location and design of all projects involving tree and shrub planting will ensure that the safety and security of site users is fully safeguarded. Conversely, the LBAP encourages community participation in creating more attractive open spaces. This will lead to greater legitimate use of the space, which will discourage crime and anti-social behaviour and hence improve perceptions of safety.</p>
Other Socio-economic Carers	Positive	Carers are likely to have more limited ability or opportunity than other sections of the community to travel long distances to enjoy nature, and so particularly benefit from having natural spaces close to home.

## Section 4 – Mitigating Impacts and Alternative Options

From the analysis and interpretation of evidence in section 2 and 3 - Is there any evidence or view that suggests that different equality or other protected groups (inc' staff) could be adversely and/or disproportionately impacted by the proposal?

Yes?                      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.)*

*Where you believe the proposal discriminates but not unlawfully, you must set out below your objective justification for continuing with the proposal, without mitigating action.*

## Section 5 – Quality Assurance and Monitoring

Have monitoring systems been put in place to check the implementation of the proposal and recommendations?

Yes?                       No?

How will the monitoring systems further assess the impact on the equality target groups?

The Biodiversity Officer will ensure that safety is fully considered in all projects involving tree and shrub planting, and that opportunities are taken where possible to improve access for all people where this can be incorporated into a biodiversity project.

The Steering Group will consider equalities issues at least annually to assess whether there is a need for further improvement.

Does the policy/function comply with equalities legislation?  
(Please consider the [OTH objectives](#) and [Public Sector Equality Duty](#) criteria)

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?

## Section 6 - Action Plan

As a result of these conclusions and recommendations what actions (if any) **will** be included in your business planning and wider review processes (team plan)? Please consider any gaps or areas needing further attention in the table below the example.





Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
<b>Example</b>				
1. Better collection of feedback, consultation and data sources	1. Create and use feedback forms. Consult other providers and experts	1. Forms ready for January 2010 Start consultations Jan 2010	1.NR & PB	
2. Non-discriminatory behaviour	2. Regular awareness at staff meetings. Train staff in specialist courses	2. Raise awareness at one staff meeting a month. At least 2 specialist courses to be run per year for staff.	2. NR	

Page 4/5

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress

## Appendix A

### (Sample) Equality Assessment Criteria

Decision	Action	Risk
As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . It is recommended that the use of the policy be suspended until further work or analysis is performed.	<b>Suspend – Further Work Required</b>	Red 
As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . However, a genuine determining reason may exist that could legitimise or justify the use of this policy.	<b>Further (specialist) advice should be taken</b>	Red Amber 
As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.	<b>Proceed pending agreement of mitigating action</b>	Amber 
As a result of performing the analysis, the policy, project or function 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.	<b>Proceed with implementation</b>	Green: 

Appendix 3

**Tower Hamlets Local Biodiversity Action Plan 2019-24 Risk Register**

<b>Risk</b>	<b>Likelihood</b>	<b>Impact</b>	<b>Score</b>	<b>Mitigation strategy</b>
Due to lack of resources and/or buy-in from partners, there is a risk that many or most of the targets are missed, resulting in a failure to protect and enhance biodiversity and consequent reputational damage	<b>1</b>	<b>3</b>	<b>3</b>	The targets have been drawn up with stakeholder engagement, and with the experience of the previous LBAP as guidance. Monitoring infrastructure is in place including a Biodiversity Officer to lead on implementation with a stakeholder Steering Group
Due to lack of suitable opportunities occurring, there is a risk that one or two targets may be missed, resulting in a failure to deliver the expected benefits for one or two habitats or species	<b>3</b>	<b>1</b>	<b>3</b>	It is quite likely that a small number of targets will be missed, but others will be significantly exceeded. Any adverse publicity around missed targets can be countered by positive stories around targets achieved and exceeded.

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<p><b>Cabinet</b></p> <p>31 July 2019</p>	 <p><b>TOWER HAMLETS</b></p>
<p><b>Report of:</b> Debbie Jones – Corporate Director, Children and Culture</p>	<p><b>Classification:</b> Unrestricted</p>
<p><b>Children and Families Strategy 2019-2024</b></p>	

<b>Lead Member</b>	<b>Councillor Danny Hassell, Cabinet Member for Children, Schools and Young People</b>
<b>Originating Officer(s)</b>	Tricia Boahene – Senior Strategy and Policy Manager (Children and Culture)
<b>Wards affected</b>	All wards
<b>Key Decision?</b>	No
<b>Forward Plan Notice Published</b>	10 <sup>th</sup> April 2019
<b>Reason for Key Decision</b>	N/A
<b>Strategic Plan Priority / Outcome</b>	<b>Priority 1: People are aspirational, independent and have equal access to opportunities; Outcome 2: Children and young people are protected so they get the best start in life and can realise their potential</b>

### Executive Summary

The Children and Families Strategy 2019-2024 sets out the Children and Families Partnership Board’s strategic direction for children, young people and families in Tower Hamlets over the next five years.

It was developed through discussion with professionals and the local community, from nursery school pupils up to those leaving the care system to understand where partners in the local area need to do better. It has been informed by data which highlights which children are doing well and who would benefit from targeted support. Using the collective insight gleaned, the Partnership came together to identify the strategic actions which need to happen so that local children and families are supported to live the best lives possible.

The Children and Families Plan 2016-2019 expired in April 2019; and will be superseded by the Children and Families Strategy 2019-2024 which is on course to be formally signed-off by the Children and Families Partnership Board at the end of July.

## **Recommendations:**

The Mayor in Cabinet is recommended to:

1. Note the contents of the draft Children and Families Strategy 2019-2024, which are reflective of changes which were made during the consultation phase that took place in May 2019.

### **1 REASONS FOR THE DECISIONS**

- 1.1 This is a noting report.

### **2 ALTERNATIVE OPTIONS**

- 2.1 The Council could choose not to endorse the Children and Families Strategy; however as one of the largest partners on the Children and Families Partnership Board this would undermine the work and direction agreed by the Partnership for the next five years.
- 2.2 The strategy provides a framework for delivering on joint priorities for aspirations, healthy families and safety and security for children and families in the borough. Without this strategy it would be difficult to map a clear, coherent direction towards important outcomes for children, young people and families in Tower Hamlets.

### **3 DETAILS OF THE REPORT**

- 3.1 The development of the Children and Families Strategy is critical in setting out the direction of travel for the Children and Families Partnership over the next five years. The Strategy also outlines how the Children and Families Partnership will deliver on the Children's element of the Tower Hamlets Plan, our overarching Partnership Strategy which already has the endorsement of the Council and Cabinet.
- 3.2 The document sets out what we have learnt from evidence and engagement and articulates this into three succinct priority areas:
- 3.3 ***Priority one: Aspiration to action***
- 3.4 ***Priority two: Healthy families***
- 3.5 ***Priority three: Safe and secure***
- 3.6 Each priority has a clear focus on which outcomes the Children and Families Partnership will deliver on, provides some detail about what the activities to



address the outcomes will be and how we will monitor our progress and success.

- 3.7 The Strategy has been developed by the Children and Families Partnership through partnership meetings and ad-hoc task and finish sub-groups of the main partnership board. It has also been informed by engagement from the Tower Hamlets Plan, the Children and Young People's Summit in November 2018, engagement on the Learning and Achievement Strategy for 14-25 Year Olds and dedicated engagement with children and young people from the ages of 2-18.
- 3.8 In May, the draft Strategy was put out to consultation, the consultation was cascaded through a number of channels, including:
  - 3.9 Children and Families Partnership
  - 3.10 Health and Wellbeing Board
  - 3.11 Born Well Growing Well
  - 3.12 Community Safety Partnership
  - 3.13 Growth and Economic Development Board
  - 3.14 Partnership Executive Group
  - 3.15 Local Safeguarding Children Board
  - 3.16 Head teachers' bulletin
  - 3.17 Parent and Carer Council
  - 3.18 Youth Council
- 3.19 Despite the circulation, the responses were generally positive, but rate was low with only 14 responses received. However, given the amounts of engagement which informed the initial drafting and redrafting of the Strategy, the Children and Families Partnership remain confident that this final draft is reflective and representative of the needs and wishes of the local community. More detail outlining the extensive amount of engagement done can be found on pages 7-9 of the Strategy document and within the appendices.
- 3.20 The Strategy is an umbrella document, designed to provide a coherent framework for local partnership activity in relation to children, young people and families. As such, is it careful to acknowledge that while all partnership work within the Borough is not necessarily owned by the Children and Families Partnership, it is the interest and responsibility of the Board to oversee work which will deliver on the important priorities which it has chosen to focus on. Some of this work will be delivered under the Tower Hamlets Together structures, the Growth and Economic Development Board or the

Community Safety Partnership; but as the overarching board with the responsibility for children and young people, the Children and Families Partnership Board will pull all of these elements together under the children and Families Strategy.

- 3.1 The Strategy is due to be signed-off by the Children and Families Partnership Board in July 2019.

#### **4 EQUALITIES IMPLICATIONS**

- 4.1 An evidence base was developed to inform the development of the strategy and includes data and insight about the protected characteristic groups wherever possible. Where gaps have been identified this has also informed outcomes and actions within the strategy. An Equality Assurance Checklist has also been completed and found that no further action was required at this stage.

#### **5 OTHER STATUTORY IMPLICATIONS**

- 5.1 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:
- Best Value Implications,
  - Consultations,
  - Environmental (including air quality),
  - Risk Management,
  - Crime Reduction,
  - Safeguarding.
  - Data Protection / Privacy Impact Assessment.

- 5.2 There are no further specific statutory implications.

#### **6 COMMENTS OF THE CHIEF FINANCE OFFICER**

- 6.1 The strategy provides a framework for delivering on joint priorities for aspirations, healthy families and safety and security for children and families in the borough. There are no known financial implications relating to the strategy detailed in this report.

#### **7 COMMENTS OF LEGAL SERVICES**

- 7.1 The development of the strategy is consistent with the Council's duty to co-operate with safeguarding partners to promote the welfare of children in its area.

## **Linked Reports, Appendices and Background Documents**

### **Linked Report**

- None

### **Appendices**

- Children and Families Strategy 2019-2024: Appendices

### **Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012**

- NONE

### **Officer contact details for documents:**

Tricia Boahene – Senior Strategy and Policy Manger, Children and Culture

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**EVERY  
CHANCE**  
*for* **EVERY  
CHILD**

**TOWER HAMLETS  
CHILDREN AND FAMILIES STRATEGY  
2019 - 2024**

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# FOREWORD

We are proud to introduce the new Children and Families Strategy 2019-2024. Our ambition for Tower Hamlets is simple:

**Together, we will seize every chance for every child or young person in Tower Hamlets to be healthy, safe and successful.**

We believe all agencies and organisations in the borough should make children and young people their priority. To do this, we will ensure that every chance and opportunity is taken advantage of for our children and young people to be happy, healthy, respected and valued contributors to this borough.

Our Strategy will take an innovative, bold approach which is different from what has previously been done: it will be focused on outcomes for residents and not on services and outputs from individual organisations. To stay true to this approach our work will need to be iterative. Whilst we believe the actions identified in this Strategy are right, with outcomes at the forefront of our work, over its lifetime we will need to review the actions to remain dynamic.

The Children and Families Partnership has thought long and hard about where we focus and how – do we focus on the most vulnerable or cater to the needs of the majority? We want to do both. This Strategy looks at how we support all of our children and young people by beginning with a commitment to early help, but also lays the groundwork for more specific focussed work in relation to the most vulnerable: those experiencing neglect, violence and those with special educational needs and disabilities (SEND), for example.

We will amplify and champion good work, but also use our joint resources and influence to unpick entrenched and developing issues alongside other leading local partnerships: the Health and Wellbeing Board, the Community Safety Partnership and the Growth and Economic Development Partnership. Therefore, while the Children and Families Partnership will be the owner of this Strategy, in order to be successful, our priorities will need to be delivered across a range of partnership groups, embedded in single agency approaches and built into commissioning intentions, with specific agencies taking the lead where appropriate.

In a borough as diverse as ours, there are many areas which the Children and Families Partnership could choose to focus on. We recognise that we stand a greater chance of success if we select and champion a few key priorities.

Our children deserve every chance to live fulfilling, enriching lives, and be valued members of our community. Together, we will support them to seize those opportunities.



**Mayor John Biggs**  
Chair of the  
Tower Hamlets  
Partnership  
Executive Group



**Cllr Danny Hassell**  
Chair of the  
Children and Families  
Partnership

# INTRODUCTION

Our Children and Families Strategy sets out the strategic direction for Tower Hamlets which we believe will deliver the best outcomes for the children, young people and families who live here. It builds on the Tower Hamlets Plan's five-year vision of tackling inequality by building a strong, inclusive and fair borough to deliver a better deal for children and young people.

To deliver a better deal, we need to understand what our local population needs and we can't meet those needs unless health services, the Local Authority, schools, the police, the voluntary sector and other agencies work together. The Children and Families Partnership is the structure we have for working together and each of our organisations is committed to delivering the support needed to drive forward positive outcomes for local children, young people and families.

Our priorities for change over the next five years will be planned and delivered through this Strategy. The Strategy will also direct partnership work for children, young people and families across the borough, including within the decisions taken by the Health and Wellbeing Board, the Community Safety Partnership and the Tower Hamlets Partnership, the multi-agency partnerships working in the best interests of the borough and local residents.

We arrived at our strategic direction through discussion with professionals and the local community, from nursery school pupils up to those leaving the care system to understand where we as a local area need to do better. We have also looked at the local Joint Strategic Needs Assessments which are completed or in development in relation to Special Educational Needs and disabilities (SEND), Adolescence, Youth Violence and Mental Wellbeing. We have also reviewed data which tells us who is doing well and who would benefit from targeted support. Using all of the insight we collected the Partnership came together to identify the strategic actions which need to happen so that local children and families are supported to live the best lives possible.

This Strategy is the conclusion of all of those conversations, and marks the start of delivering a fresh direction for children, young people and families.

**We are proud to share this vision with you.**

**EVERY  
CHANCE  
for EVERY  
CHILD**



# SUMMARY DEMOGRAPHICS

There are **75,455** **0-19 year olds** in Tower Hamlets<sup>1</sup>.



**Around 8%** of the school population was **born outside the UK**, and around a third of these pupils were



born in Bangladesh, with a growing proportion from EU member states. **75%** of Tower Hamlets primary school pupils speak a **first language which is not English**, compared to 54% in Inner London and 21% nationally.<sup>2</sup>

There were **113** young people in **drug and alcohol treatment** and **259** clients starting treatment living with children under the age of 18 in 2017/18.<sup>3</sup>



Of the estimated **125,900 households in Tower Hamlets**, one in five households is made up of more than one family and 7 per cent of households have more than six people (compared with 4 per cent in London).<sup>4</sup>



There are **1,039 Children in Need**, **314** Children subject to a **Child Protection Plan** (46 per



10,000 population compared to 45 nationally) and 331 children who are Looked After in Tower Hamlets (48 per 10,000 population compared to 65 nationally).<sup>5</sup>

There is a higher rate (**17%**) of under-25s in the borough with **special educational needs** compared to the England average of 14%.<sup>6</sup>



There are **47,218 pupils in 120 maintained nurseries, maintained and independent schools** in Tower Hamlets.<sup>7</sup>



**93%** of children accessing early years places are **receiving support from Good or Outstanding early education providers**.<sup>8</sup>



There are higher rates of children aged 10-16 who are in the **youth justice system** in Tower Hamlets. **9 per 1,000** 10-16 year olds were in the youth justice system (2016/17) compared to in London (6 per 1000) and England (5 per 1000).<sup>9</sup>



Our **Specialist Domestic Abuse Courts** have seen an **11% increase** in conviction rates, and have a victim satisfaction rate of 90%.<sup>10</sup>

Tower Hamlets has the **3rd highest economic output**



of any local authority area in the UK, next to Westminster and the City of London. Jobs growth is likely to be in the professional sectors, indicating an increased demand for highly qualified workers.

(1) ONS Mid-year population estimates 2017 (2) DfE June 2018 – Schools, Pupils and their Characteristics January 2018 (3) PHE NDTMS (4) Reference is Census 2011 (5) MI Report: April 2019 (6) PHE Fingertips tool. <https://fingertips.phe.org.uk/> (7) Reference is DfE June 2018 – Schools, Pupils and their Characteristics: January 2018 (8) Reference is DfE - Provision for children under the age of 5 years: January 2018 (9) PHE Fingertips tool. <https://fingertips.phe.org.uk/> (10) VAWG Strategy

# WHAT DO LOCAL CHILDREN AND FAMILIES THINK?



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We began to develop our understanding of what our community needs by using the messages they shared to develop the Tower Hamlets Plan, beginning in Summer 2017.

- As part of their community engagement over summer 2017, Collaborate and the council undertook 25 community leader interviews, 33 community events, 104 public interviews and 5 focus groups
- The Tower Hamlets Partnership Summit in January 2018 was attended by nearly 300 people from across 160 organisations
- Between February and March 2018 the Tower Hamlets Partnership undertook an online survey which had 96 respondents

There are two regular surveys of local students and parents, whose results were shared in Summer 2018 which validated the messages from the Tower Hamlets Plan:

- 1,824 pupils took part in the 2017 Pupil Attitude Survey, with 1,433 primary pupil responses and 391 secondary pupil responses
- 209 parents and carers responded to the 2018 Parent Carer Survey

To develop a clear set of priorities for this Strategy, we took the earlier engagement and used it to shape specific engagement with children, young people, parents, carers and local professionals

- The Children's Services Summer Survey 2018 garnered responses from 126 teenagers and pre-teens, and 22 parents and carers
- The November 2018 Children and Young People's Summit was attended by 100 delegates including statutory and voluntary partners, and young people
- Between December 2018 and February 2018 we visited 5 nursery and primary schools for face to face engagement
- Young People's Question Time – March 2019

The draft strategy was also shared with children, young people, parents, carers and professionals for a three week consultation period in May 2019; the results of which have informed the final strategy.

A summary of the messages we received are on pages 7 and 8, but more detail can be found in the appendices.

# WHAT DO LOCAL CHILDREN AND FAMILIES THINK?

## 34% of parents and carers have not had enough information to help them plan their child's future<sup>11</sup>

47% of all pupils aspire to be in '**top professional job**', this is especially the case for Bangladeshi primary pupils but least likely for White primary pupils



**Exams and school work** are a common worry among 53% primary pupils and 42% secondary pupils<sup>12</sup>



Young people worry over **employment** and **money**, and would like more support around these issues



Young people are not achieving their aspirations because of a focus on **academic outcomes**; a 'one-size-fits-all' approach and a lack of parental support



We are missing opportunities to connect local people to **economic opportunity** because local growth is not 'inclusive', especially for young people



The **aspirations** of and offer to young people needs **improving**. There needs to be more opportunities taken up post-GCSE



Young people need more opportunities for **work experience** and careers advice (tailored to individuals)



There needs to be more **emphasis on developing young leadership** and enabling more young people to have this opportunity to grow and develop through learning alongside and with people who are different from them

## 64% of parents worry about their child's health and wellbeing often<sup>13</sup>

We need an increase in children's levels of **self-confidence** that allows them to build healthy relationships and achieve emotional and economic wellbeing

Only 24% primary pupils and 11% secondary pupils report eating recommended five portions of **fruit** and **vegetables**<sup>14</sup>



Young people identified their health – including **mental health**, as the most important thing they feel local leaders in Tower Hamlets should focus on

PSHE support and lessons should be given by specialists covering **cyber bullying, self-harm, eating disorders, self-esteem** and **managing stress**

Some parents and carers specifically cited support for **special educational need and disability** as the most important thing to focus on



Free, **unstructured play** has an **essential role to play** in healthy children and families'.

(11) 2018 Parent Carer Survey (12) Pupil Attitude Survey 2017 (13) 2018 Parent Carer Survey (14) Pupil Attitude Survey 2017

# WHAT DO LOCAL CHILDREN AND FAMILIES THINK?

## Ensuring children and young people are safe in their community

73% secondary pupils know how to report **online bullying**. But only **40% would report it**<sup>15</sup>



We need increased engagement around **violence** against **women and girls**



17% of parents do not feel confident monitoring social media/internet use<sup>16</sup>



Young people can find it hard to **trust adults** enough to confide in them



New technologies mean young people can no longer **'close the door'** to violence in their neighbourhoods



"Should focus on **ASB, drugs, knife sweeps**. People don't like being nervous when they are out"



6% of secondary school pupils have tried **drugs**, mostly solvents and cannabis<sup>17</sup>



57 young people responded to the question 'do knife arches in schools have a role to play in making young people feel safer?' **41** young people said it did not<sup>18</sup>



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## Provision and facilities

More provision is needed to support parents with **disabled children** and thresholds for access should be reviewed



More spaces and **affordable activities** are needed



50% say more **information** about where they can go with their family would improve family life<sup>19</sup>



Many young people identified **youth services, sports facilities** and a **diverse community** as the best things on offer in the borough



(15) Pupil Attitude Survey 2017 (16) 2018 Parent Carer Survey (17) Pupil Attitude Survey 2017 (18) Young People's Question Time, March 2019 (19) 2018 Parent Carer Survey

# OUR CHARTER

We want to ensure that there is every chance for every child to be happy, healthy, safe and successful.

In order to do that, we commit to a number of fundamental principles:

- **Working restoratively with children, young people and families** so that together we build relationships between professionals and families, prevent harm and resolve conflict where it arises.
- **Developing and championing engagement with children and young people** so we can empower children and young people in our borough to shape services and the future of our borough.
- **Committing to consistent and sustained focus on achieving better outcomes** for children, young people and families, which is respectful of and responsive to different needs.
- **Ensuring that all children, young people and families are supported to access the right help at the right time** so problems do not escalate.
- **Ensuring a strong offer of services for all families in the borough**, supplemented by access to an enhanced range of services, intervention and support for those that need it.
- **Sharing data in a safe but timely way** to enable better service planning and interventions to take place.
- **Sharing positive stories of children and young people in Tower Hamlets** and their achievements to challenge negative perceptions and so they feel they are a valued part of our community.

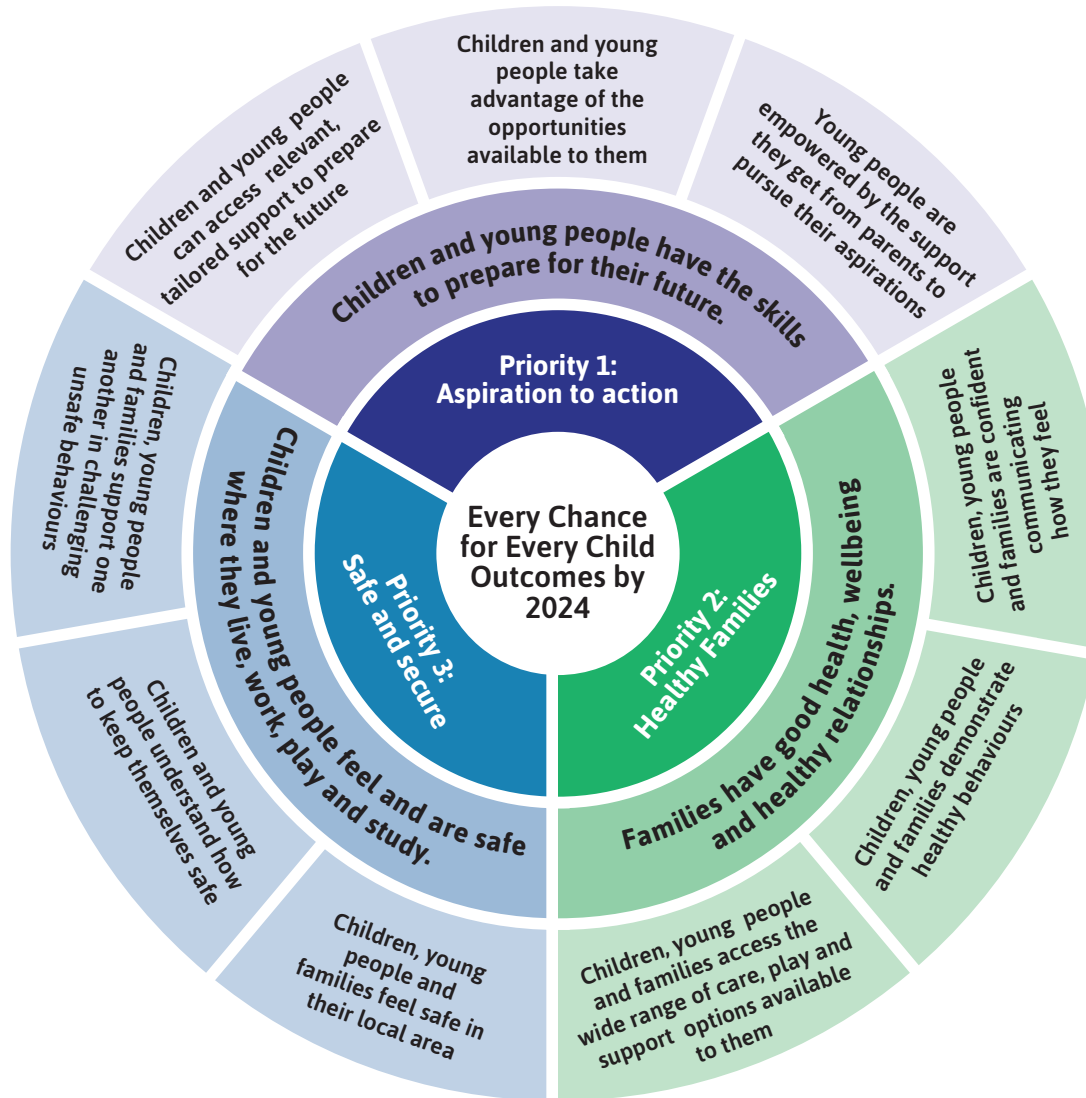


- **Ensuring every child and young person will have a trustworthy and trusted adult to confide in** – be it parent, teacher, teaching assistant, youth worker or social worker – who can support them with their needs, especially if they are concerned about their safety or wellbeing.
- **Ensuring every child should have access to a safe space** – either at home, in a school, youth hub, leisure centre or Idea Store.

Our principles and the actions related to our priorities will form the basis of a local multi-agency campaign over the life of the Strategy which will see us put children and young people at the heart of everything we do in Tower Hamlets.

# OUR PRIORITIES FOR CHILDREN AND FAMILIES

Our Strategy has developed its priorities in a way that local children, young people and families recognise so that there is every chance for every child in Tower Hamlets to thrive. The Strategy has three main priorities which will drive our work and focus for children, young people and families in Tower Hamlets:



# PRIORITY 1: ASPIRATION TO ACTION

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WHAT OUTCOME DO WE WANT TO ACHIEVE  
THROUGH THIS PRIORITY?

**Children and young people have the skills to  
prepare for their future.**



# PRIORITY 1: ASPIRATION TO ACTION

## WHY IS THIS PRIORITY IMPORTANT?

We are committed to ensuring that every child and young person has the chance to access information and develop the skills they will need to prepare for their future. It is essential that they have good quality education as a foundation with high quality guidance and support available when it is needed. They need opportunities to explore different options, expand horizons and learn new skills as they progress through their lives. This includes ensuring that children and young people have secure foundations to take advantage of these opportunities.

Despite Tower Hamlets historically exceeding the national average in terms of educational attainment at the secondary level, this is not translating into excellent progress or sustained employment outcomes for our young people.

In order for aspirations to be realised and translated into good employment outcomes the support that is offered needs to be tailored to the individual. By taking account of their interests and being informed by what we know about the future job market, we can help young people develop the skills and abilities that employers are looking for.

Children and young people have told us that they highly value all opportunities to plan for their future and find out more about the options open to them but quality and accessibility can be variable. The views and expectations of parents and carers are also important to young people and whilst this is usually a positive motivation it can sometimes create additional pressures.

**The average attainment 8 score at GCSE for all pupils in Tower Hamlets is 47 (compared to 45 nationally). However, this falls to just 36 for Black Caribbean boys and lower still to 28 for White British boys on Free School Meals.<sup>20</sup>**

## WHAT WILL OUR FOCUS BE?

Our focus will be on ensuring opportunities to enhance the employability of local children and young people are well known and shared across the borough, this includes looking at opportunities for soft skills and non-traditional pathways into the world of work.

The Children and Families Partnership will show leadership through its own organisations with commitments to take on apprentices and ensuring there are work experience opportunities available. We will also use our influence to encourage other organisations across the borough – and the city where possible – to do the same.

**“It’s hard to get public sector work experience, especially in the NHS.  
Young person”**

(20) Revised 2018 GCSE results – January 2019



## WHAT ACTIONS WILL WE TAKE?

- We will develop a cultural and enrichment offer which supports children and young people to experience diverse opportunities so that they feel less intimidated in unfamiliar spaces and therefore empowered to take up the career path which suit them best.
- We will deliver an education and awareness programme to promote science, technology, engineering, arts and mathematics (STEAM) through play and early education providers.
- We will work with partners to understand the main professional and vocational career progression routes which our GCSE offer supports, including information on the value and benefits of various options.
- We will offer work experience placements to local children and young people, including for care leavers and those with special educational needs and disabilities (SEND) from within our own organisations.
- We will develop ways to work with parents, carers and trusted adults (including for those who are less engaged) to encourage them to support children and young people to access opportunities.
- We will develop an agreed approach and set of messages for children, young people and families about preparing for the future informed by messages from local employers, including businesses, faith and community organisations.
- We will develop a web-based single point of access to inform young people and families about careers, skills and enrichment opportunities in the borough.
- We will empower parents, carers and trusted adults with information around a range of education and career pathways, engaging them positively on options for young people in open settings such as career fairs.

- We will ensure young people are supported to explore enterprise as a career option, alongside apprenticeships and traditional career routes.

**A pilot is being developed by the council with Swanlea School which aims to improve careers education for Years 7-9. It will ensure young people feel confident and motivated to try their best in school - in the knowledge that they have many career paths open to them. If successful the approach could be rolled out across the borough.**

## WHAT OTHER WORK IS CONTRIBUTING TO OUR PRIORITY?

The focus of the Partnership will need to compliment and align with the good work going on in individual schools and other agencies, but also ensure that it sensibly links in with the local strategic direction for economic development.

We will work closely with the Growth and Economic Development Partnership to help deliver employability opportunities for local young people, this is reflected in the Growth and Economic Development Plan 2018 – 2023, particularly within priority one ‘preparing our young people for success’. Our focus will also be reflected through the work of our 14-25 Partnership and the new Learning and Achievement Strategy for 14-25 year olds the specific employability needs of children looked-after and care leavers will remain a focus for the Corporate Parenting Board.

# PRIORITY 1: ASPIRATION TO ACTION

## WHAT OUTCOMES WILL BE ACHIEVED BY 2024?

- Children and young people can access relevant, tailored support to prepare for the future
- Children and young people take advantage of the opportunities available to them
- Young people are empowered by the support they get from parents to pursue their aspirations



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## HOW WILL WE KNOW IF THIS IS WORKING?

INCREASE THE PERCENTAGE OF SECONDARY PUPILS WHO HAVE ENOUGH INFORMATION AND SUPPORT TO HELP PLAN THEIR FUTURE



INCREASE THE PROPORTION OF YOUNG PEOPLE ENGAGED WITH YOUNG WORKPATH FROM GROUPS AT HIGH RISK OF NOT BEING IN EDUCATION, EMPLOYMENT OR TRAINING



INCREASE THE PROPORTION OF PARENTS WHO ARE OPEN TO NON-ACADEMIC CAREER ROUTES FOR THEIR CHILDREN



INCREASE IN THE PERCENTAGE OF 16/17 YEAR OLDS IN EDUCATION, EMPLOYMENT OR TRAINING



# PRIORITY 2: HEALTHY FAMILIES

WHAT OUTCOME DO WE WANT TO ACHIEVE  
THROUGH THIS PRIORITY?

Families have good health, wellbeing and  
healthy relationships.

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# PRIORITY 2: HEALTHY FAMILIES

## WHY IS THIS PRIORITY IMPORTANT?

We want to ensure our children have every chance to lead healthy lives, have a sense of wellbeing and form healthy, fulfilling relationships. With the 12th highest proportion of childhood obesity in London for Reception aged children (11%) and 4th highest proportion in Year 6 (27%), physical health must feature as a local priority for children, young people and families. Therefore an integral part of this priority has to be about looking at play, physical activity and sport for children and young people.

However, being healthy is not limited to physical health—mental health and resilience can influence our physical health, as well as our capability to lead a healthy lifestyle. Around 30% of people with any long-term physical health condition, including obesity and asthma, also have a mental health problem, which can exacerbate some long term conditions. Mental health is also closely associated with domestic abuse and substance misuse, with each one a risk factor for the other two.

Many children and young people are building resilience after experiencing loss, or dealing with poverty. Secondary school pupils report feeling stressed and pressured with exams and thinking about the future. What is clear is that having someone to talk to, and feeling heard is fundamental to young people in helping them cope with the demands of the modern world.

Healthy, strong relationships with family, friends and professionals can help our children and young people to feel happier and more secure, as well as build a sense of belonging and self-worth. We want to help our communities to encourage their children and young people to share their feelings and know they are understood.

(21) Public Health England (2019). (PHE Fingertips tool)

**11% of people aged 5-16 years old in Tower Hamlets were estimated to have mental health disorders in 2015. This is higher than in London as a whole.<sup>21</sup>**

Children who have been neglected or exposed to adverse childhood experiences are more likely to experience mental health problems including depression, post-traumatic stress, and attention deficit and hyperactivity disorder. These factors also increase the risk of poor overall health. Therefore, we are committed to ensuring that children, young people and families have access to high quality services and support during the 1,001 critical days between conception, a child's second birthday, and beyond.

**“ PSHE at school is patchy and drops off completely in 6th form. Young person ”**

# PRIORITY 2: HEALTHY FAMILIES

## WHAT WILL OUR FOCUS BE?

The first 1,001 days of a child's life are crucial for healthy mental and physical development, so we will support a system wide approach to improving outcomes for children in the early years with a focus on speech, language and communication skills. From the earliest years through to adolescence, children need access to safe spaces to play and engage in physical activity; we want to make that possible. We will support our children, young people and families to make informed choices about what good health entails early on, directing them towards the right support at the right time. We will work to remove the stigma around mental health, encouraging children, young people and their families to talk to each other and share their needs.

This priority sits within both the health and children's arenas. With the Partnership setting the strategic direction for children and families overall, we will work with the Health and Wellbeing Board and the Tower Hamlets Together sub-group, Born Well Growing Well to make this priority a success. Additionally, we will add value where a wider partnership response—which involves services like housing, schools or probation—is needed, reflecting the broader health and wellbeing concerns which children and families have told us are important to them. To effectively deliver on this, we will ensure that we make best use of our award winning parks, idea stores, and children's centres to promote and deliver health and wellbeing programmes and opportunities for families.

## WHAT ACTIONS WILL WE TAKE?

- We will engage with children, young people and partners about the local personal, social and health education curriculum to support schools to develop a rich co-produced offer.
- We will campaign with community leaders and schools to encourage parents and other trusted adults to discuss wellbeing, emotional health and resilience with children and young people.
- We will promote a Play Charter which encourages individuals and organisations to advocate for quality play space, physical activity and play in the borough.
- We will improve the accessibility and quality of information for children, young people and families, in particular those with SEND, to ensure it accurately reflects the services each member organisation of this partnership offers.
- We will provide basic training on the early help offer to all local authority officers, NHS staff and other partners who may not be the 'usual suspects', such as local shops and businesses so we can help families access the right support at the right time.
- We will ensure there are effective, integrated pathways between mental health, domestic abuse and substance misuse services, and ensure professionals receive training across all adverse childhood experiences.

## PRIORITY 2: HEALTHY FAMILIES

### WHAT OTHER WORK IS CONTRIBUTING TO OUR PRIORITY?

There is so much valuable and exciting work happening across the borough which supports the health and wellbeing of local families. Born Well Growing Well are working through programmes and improvements including:

- Increased mental health access and extending the offer for mild, moderate and severe needs.
- Improving levels of healthy weight and dental health in children and young people.
- A Child Obesity Plan is also in development

Air quality and its impact on children and families is of concern given the built up nature of the local environment. The local air quality action plan will be exploring the installation of Green Infrastructure, such as green walls or living roofs at schools and residential developments in polluted areas. Whilst the works within our local parks and open spaces, such as our new outdoor gyms, provide an environment which is supportive of healthier lifestyles.

**Tower Hamlets is a trailblazing site for a national project to improve the mental health of children and young people. The pilot will fund dedicated school Mental Health Support Teams (MHSTs), training to establish senior mental health leads and reduced waiting times for accessing Child and Adolescent Mental Health Service (CAMHS) treatment.**



# PRIORITY 2: HEALTHY FAMILIES

## WHAT OUTCOMES WILL BE ACHIEVED BY 2024?

- Children, young people and families are confident communicating how they feel
- Children, young people and families demonstrate healthy behaviours
- Children, young people and families access the wide range of care, play and support options available to them



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## HOW WILL WE KNOW IF THIS IS WORKING?

**INCREASE IN THE PERCENTAGE OF CHILDREN ACHIEVING AT LEAST THE EXPECTED LEVEL IN ALL EARLY LEARNING GOALS IN THE EARLY YEARS; AND THE COMMUNICATION AND LANGUAGE GOALS IN PARTICULAR**



**INCREASE IN THE PROPORTION OF SCHOOL PUPILS WHO HAVE SOMEONE TO TALK TO WHEN THEY ARE WORRIED**



**INCREASE IN THE PROPORTION OF CHILDREN AND YOUNG PEOPLE ACCESSING TIMELY CAMHS SUPPORT**



**DECREASE IN THE PROPORTION OF CHILDREN IN RECEPTION CLASS WHO ARE OBESE OR OVERWEIGHT**



**CHILDREN AND FAMILIES ARE CONTINUING TO ACCESS PLAY SESSIONS AT CHILDREN'S CENTRES AND STAY & PLAY SESSIONS IN PARKS AND OPEN SPACES**



# PRIORITY 3: SAFE AND SECURE

WHAT OUTCOME DO WE WANT TO ACHIEVE  
THROUGH THIS PRIORITY?

Children and young people feel and are safe  
where they live, work, play and study.





# PRIORITY 3: SAFE AND SECURE

## WHY IS THIS PRIORITY IMPORTANT?

All children and young people have a right to feel safe and secure. Through our focus groups, we learnt that younger children have concerns about fire and strangers. However, not one child mentioned online danger, which head teachers told us was of utmost concern to them and parents.

We know from the most recent Pupil Attitude Survey that 30% of primary school children and 25% of secondary school children had experienced bullying. Schools work hard to make a difference on this issue and have strategies to address bullying. But we must continue to be attentive because we know that children who are bullied will on average have poorer school attendance which in turn impacts on their attainment and wellbeing.

Although many local children and young people have reported that they do feel safe in the community, a significant number feel unsafe or uncomfortable walking to and from school. This perceived risk is supported by local statistics which indicate children and young people are more likely to be involved in violent incidents during this time. Secondary school pupils report feeling safe in the area where they live, however this drops significantly when asked about going outside of that area.

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**92% primary pupils felt safe in school and 84% of secondary pupils also felt safe.<sup>22</sup>**

For our most vulnerable children and young people, safety is not always a given and this Partnership will work together to safeguard those at risk of exploitation and harm. All children said they felt safest when with their parents or teachers, meaning we can support those who keep children safe by ensuring they are informed and equipped to deal with the most sensitive subjects, which include:

- Exploitation
- Serious youth violence
- Domestic abuse
- Substance misuse
- Neglect
- Violence against women and girls (VAWG)
- Missing from home and education

**“It is often boys, rather than girls who fear for their safety.”**  
**Teenage girl, CYP Summit**

(22) Pupil Attitude Survey 2017

## PRIORITY 3: SAFE AND SECURE



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### WHAT WILL OUR FOCUS BE?

As well as being safe, young people should feel safe in their community. We will ensure that there is a much stronger voice for young people in relation to making their environment feel safe, the development of youth services and in response to community safety issues.

Our focus going forward will be on building resilience within families and between different communities to ensure that children are safe and secure. As a Partnership we will focus on reducing the exposure to and perpetuation of violence by children and young people, very much in conjunction with the Community Safety Partnership.

### WHAT ACTIONS WILL WE TAKE?

- We will redesign our youth offer so there is more integration between the youth offer in hubs, detached and outreach youth work so services meet the needs of young people, including those needing targeted provision.
- We will ensure that families can get advice and support with safety concerns face-to-face across the borough, particularly where English is an additional language.
- We will improve opportunities for children, young people and families to participate in community initiatives so they can reclaim their local communities and feel invested in their neighbourhoods.
- We will develop, promote and deliver a comprehensive training offer for parents and professionals that includes priorities around stranger danger, fire and road safety, e-safety, safeguarding, adverse childhood experiences and a public health approach to violence.
- We will ensure personal, social health education is consistently good quality across the borough, including discussions around bullying, hate crimes, gangs and serious youth violence, VAWG, the impact of exploitation and the use of substances to facilitate it.
- We will work with the council and education providers to develop an approach to managing behaviour and the use of exclusions which takes into account the context and experiences of young people.
- We will work with the Community Safety Partnership to provide a platform for young people to share their views and question senior leaders on areas of concern.

## PRIORITY 3: SAFE AND SECURE

### WHAT OTHER WORK IS CONTRIBUTING TO OUR PRIORITY?

The safety and security of local children and young people is a priority for all of our partners. It can be seen in the work of the Metropolitan Police when responding to incidents of domestic abuse in the home and violence on our streets, in social care when responding to neglect and exploitation, for our local schools in tackling bullying and cyber-safety.

Many other areas of this work which require a strategic focus for the whole population will be led by the Community Safety Partnership, such as our overall approach to serious violence, substance misuse and domestic abuse. It would be wrong for this Strategy to undermine or disrupt such work; instead we will compliment good practice at a partnership level where there is a specific focus on children and young people. The Tower Hamlets Safeguarding Children Partnership is currently developing a strategy for tackling Violence, Vulnerability and Exploitation among young people which this Partnership will help to deliver.

**The Early Help Service was recently successful in applying for a grant Practitioner Training programme. The Practitioner Training programme aims to train 400 practitioners at varying levels. It will support Tower Hamlets to ensure practitioners across the partnership are aware of parental conflict and its impact on children; provide local training for frontline practitioners so they have the confidence and knowledge required to identify parental conflict, offer initial support and signpost to appropriate services where relevant; and build sustainability to deliver future training themselves via a 'train the trainer' approach.**

# PRIORITY 3: SAFE AND SECURE

## WHAT OUTCOMES WILL BE ACHIEVED BY 2024?

- Children, young people and families support one another in challenging unsafe behaviours
- Children and young people understand how to keep themselves safe
- Children, young people and families feel safe in their local area



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## HOW WILL WE KNOW IF THIS IS WORKING?

INCREASE  
IN THE  
PROPORTION  
OF SECONDARY SCHOOL  
PUPILS WHO WOULD  
FEEL COMFORTABLE  
REPORTING ONLINE  
BULLYING AND HATE  
CRIME



DECREASE IN  
THE RATE  
OF CHILDREN  
SUBJECT TO  
CHILD PROTECTION  
PLANS



DECREASE IN  
THE NUMBER OF  
SERIOUS YOUTH  
VIOLENCE  
OFFENCES



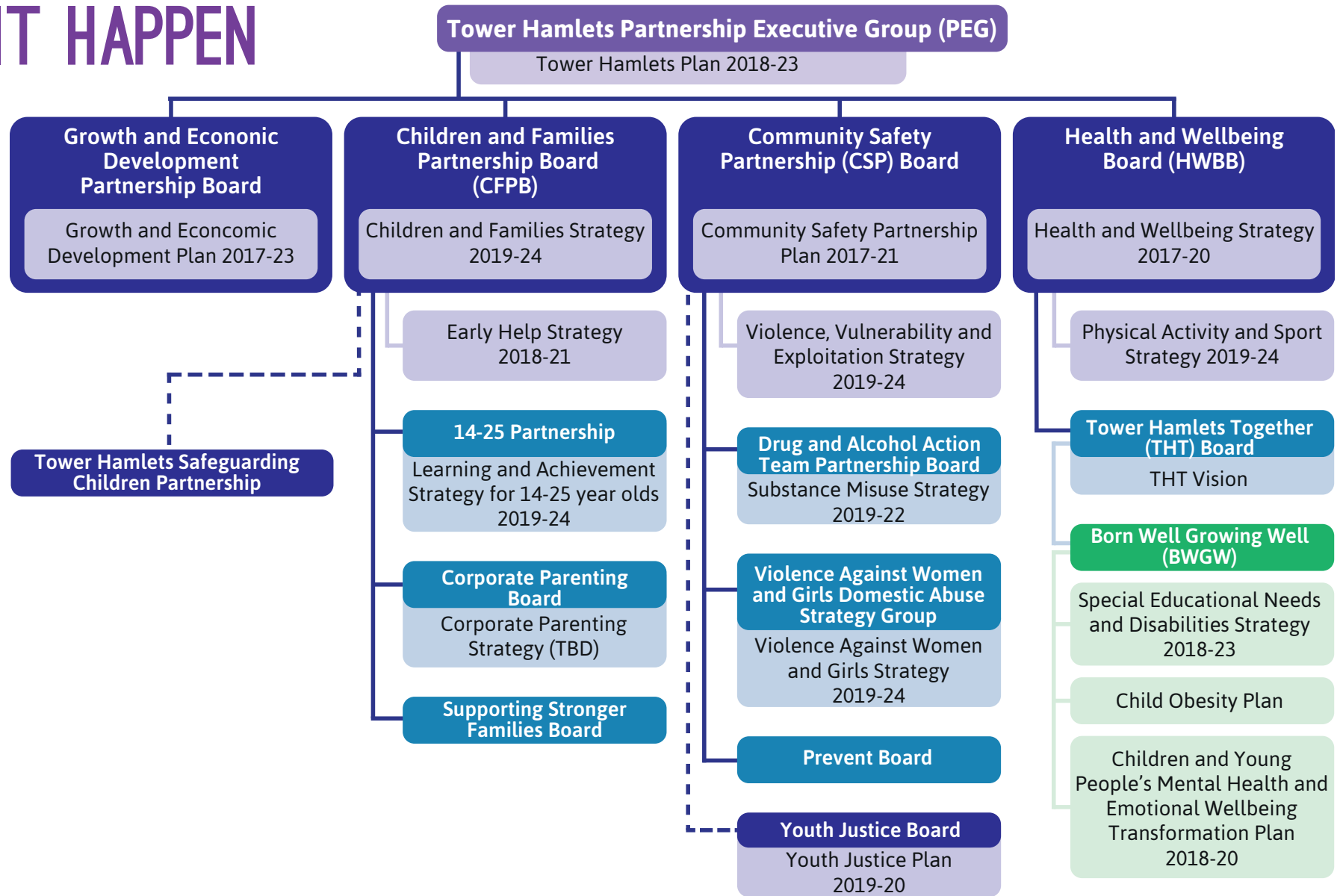
INCREASE  
IN THE  
PROPORTION OF  
PRIMARY AND  
SECONDARY PUPILS WHO  
FELT SAFE IN THE AREA  
WHERE THEY LIVE



INCREASE  
IN THE  
PROPORTION OF  
PARENTS AND  
CARERS WHO FEEL SAFE  
IN THEIR LOCAL AREA



# MAKING IT HAPPEN



In the same way that the Tower Hamlets’ Partnership priority on children is monitored by that group, but delivered by the Children and Families Partnership; only by linking in with strategic decision making across partnerships and agencies, we will be able to provide the added value needed to deliver on this ambitious strategy. Alongside recognising the links to the partnerships listed below, important links are maintained on the Children and Families Partnership through its membership, many of whom sit on other partnership groups. This is the strategic system that will deliver on our priority outcomes.

# OUR PARTNERS



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With special thanks to the following organisations for allowing us to hear directly from children and young people about what they wanted to see in this Strategy:  
Columbia Market Nursery School; Elizabeth Selby Infant School; Arnhem Wharf Primary School; Hermitage Primary School; George Green's School; Children's House Nursery School; Swanlea School; Our Time All Ability Group; Limehouse Youth Hub; Central Foundation Girls' School

**CONTACT:**

Children and Culture Strategy  
Policy and Performance team


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**EVERY  
CHANCE**  
for **EVERY  
CHILD**

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# Agenda Item 6.7

<b>Cabinet</b>  31 July 2019	 <b>TOWER HAMLETS</b>
<b>Report of:</b> Asmat Hussain, Corporate Director Governance	<b>Classification:</b> Unrestricted
Response to Overview and Scrutiny Committee's Challenge Session recommendations: Communications	

<b>Lead Member</b>	
<b>Originating Officer(s)</b>	Andreas Christophorou (Divisional Director Communications) <a href="mailto:Andreas.Christophorou@towerhamlets.gov.uk">Andreas.Christophorou@towerhamlets.gov.uk</a> Genevieve Duval (Strategy & Policy Officer) <a href="mailto:Genevieve.Duval@towerhamlets.gov.uk">Genevieve.Duval@towerhamlets.gov.uk</a>
<b>Wards affected</b>	All wards
<b>Key Decision?</b>	Yes
<b>Forward Plan Notice Published</b>	Yes
<b>Reason for Key Decision</b>	Impact on Wards
<b>Strategic Plan Priority / Outcome</b>	<b>Priority 3</b> A dynamic outcomes-based Council using digital innovation and partnership working to respond to the changing needs of our borough. <b>Outcome 9</b> - People say we are open and transparent putting residents at the heart of everything we do. <b>Outcome 10</b> - People say we work together across boundaries in a strong and effective partnership to achieve the best outcomes for our residents. <b>Outcome 11</b> - People say we continuously seek innovation and strive for excellence to embed a culture of sustainable improvement.

## Executive Summary

This report submits the response to the recommendations of the Overview and Scrutiny Committee's Challenge Session on the Council's Communications.

## Recommendations:

The Mayor in Cabinet is recommended to:

1. Agree to the responses to the Overview and Scrutiny Committee's (OSC) Challenge Session recommendations (at Appendix 1); and
2. Support officers' reporting of progress to OSC as required.

## **1 REASONS FOR THE DECISIONS**

- 1.1 The Council's constitution requires the Executive to respond to recommendations from the OSC.
- 1.2 The action plan within this report outlines the Executive response to the recommendations arising from the Challenge Session recommendations.

## **2 ALTERNATIVE OPTIONS**

- 2.1 To take no action, or not to agree the action plan is not recommended as the report outlines work undertaken by Councillors, officers and external partners to identify areas of improvement and the Council's response which identifies actions it will take to respond to these scrutiny recommendations.

## **3 DETAILS OF THE REPORT**

- 3.1 Since 2018 the council's Communications Service has been fully consolidated – moving away from a model where communications was carried out by individual service areas, and now follows a more coordinated and systematic approach. The Council has been able to coordinate its communications activity to be able to more accurately link to corporate priorities. Communications is now a key strategic function of the organisation, and while much improvement has been made over the last four years, there are still questions around its overall effectiveness.
- 3.2 The OSC identified the Council's communications with residents as the focus for this Scrutiny Challenge Session. Resident engagement is a key priority in the council.
- 3.3 There were a number of reasons for holding the scrutiny Challenge Session, including concerns from Members about the limited readership and reach of 'Our East End', a magazine published every three. Concerns were also raised about limited access for digitally excluded or disabled residents, and the potential adverse impact of the demise of the East End Life newspaper on digitally excluded residents and protected equality groups. Members have also raised concerns about the continuous negative image of the Council and lack of a clear and consistent engagement with mainstream and BAME media outlets. Members also wanted to ascertain whether our internal communications support the pace of organisational change given the Council's transformation agenda.
- 3.4 The Challenge Session aimed to ensure that communications promotes increased engagement with residents and stakeholders, and effectively tells the Tower Hamlets 'story' to strengthen the relationship. It also aimed to ensure the communication function supports corporate objectives and identify how Members can support the function. Members wanted to review the quality of communication with local residents in order to develop a clear

understanding of the communications issues facing the service. The Challenge Session was underpinned by key questions:

- What is the current readership and reach of Our East End and digital media?
- What are the different avenues to inform and engage stakeholders?
- What areas are we looking to develop in the future?
- How does TH compare with neighbouring boroughs?
- Who are we not fully reaching? What will we do differently to support residents who are digitally excluded or have language difficulties?
- How were the objectives in the new strategy developed? Who did we consult? How they are going to be monitored and evaluated in future?

3.5 The Challenge Session was chaired by Councillor Bex White, Scrutiny Lead for Governance on the Overview and Scrutiny Committee.

3.6 Andreas Christophorou, Divisional Director of Communications and Marketing at LBTH, provided an overview of communications in the Council and detailed further plans for improvement. Polly Cziok, Director of Communications, Culture and Engagement from Hackney Council, also attended as a guest speaker to provide an overview of how Hackney's communication campaigns strengthened their brand and engagement with residents.

3.7 The resulting Communications Challenge Session Report 2018- 2019 was tabled at the March 2019 meeting of the OSC. The Committee welcomed the recommendation's contained within the report and agreed that any specific comments should be referred to the Chair and Councillor Bex White the Scrutiny Lead for Governance for further consideration.

3.8 This report and the actions presented at Appendix 1 form the response to OSC Challenge Session recommendations.

#### **4 EQUALITIES IMPLICATIONS**

4.1 The session aimed to improve communications with residents. Through the developments of the recommendations a consideration was given to improving communications for all protected groups.

#### **5 OTHER STATUTORY IMPLICATIONS**

5.1 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:

- Best Value Implications,
- Consultations,
- Environmental (including air quality),
- Risk Management,

- Crime Reduction,
- Safeguarding.
- Data Protection / Privacy Impact Assessment.

5.2 No other statutory implications.

## **6 COMMENTS OF THE CHIEF FINANCE OFFICER**

6.1 There are no specific financial implications arising from the recommendations within this report. It should be possible to deliver the recommendations using existing Council budgets and resources.

6.2 However, should the need arise for any additional resources; officers will be obliged to seek appropriate financial approval before making a commitment.

## **7 COMMENTS OF LEGAL SERVICES**

7.1 The Council must comply with the Code Of Recommended Practice on Local Authority Publicity 2011 in respect of all its communication activity. The broad recommendations highlighted in the report comply with the code of practice.

7.2 However, the method of implementation will also need to be reviewed at the point of implementation in the light of the code. Also, the Code requires a increased level of care in times of heightened sensitivity, for example, during the time immediately prior to an election. The method of implementation will need to have regard to this.

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## **Linked Reports, Appendices and Background Documents**

### **Linked Report**

Communications Challenge Session Report 2018- 2019:

<https://democracy.towerhamlets.gov.uk/documents/s145639/OS%20Cover%20Sheet%20Communications%20with%20legal%20comments%20URGENCY.pdf>

### **Appendices**

1. Communications challenge session action plan

### **Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012**

None

### **Officer contact details for documents:**

## SCRUTINY CHALLENGE SESSION ACTION PLAN

Action	Responsibility	Date
<b>Recommendation 1:</b> That the council utilise its staff members to be bold and innovative and to be ambassadors, communicators, and thought leaders to tell the council and borough's story.		
<ul style="list-style-type: none"> <li>• More work needs to be done to ensure that the gap in knowledge and education about the borough is filled</li> <li>• Ensure the council is telling its own story rather than it being told by others</li> </ul>		
<p>The new Corporate Communications Strategy 2019/20 to 2021/22, due to be launched in June, will include both an enhanced corporate (council narrative) and an enhanced Tower Hamlets place narrative. Implementation</p> <p>It is clear that elements of these narratives should be built into the work of all officers and members including any strategies and plans. This has been agreed by CLT.</p> <p>There will be internal promotion to staff including TH now, posters and intranet. In addition, all DLTs will be visited with it and it will be presented to the Senior Managers Forum.</p> <p>The place narrative will be promoted to partners and stakeholders to endorse and advocate. This will be done by better stakeholder engagement through cultural programmes and our upcoming place campaign.</p>	Andreas Christophorou (Comms)	<p>Corporate Communications Strategy launched in June/July.</p> <p>Narratives to be used ongoing from then.</p>
Continuation of embedding our values enables staff to be confident at work and work to review our performance appraisal approach to include two way feedback and development can support us to create engaged and motivated employees. A range of development is available for our staff from having conversations to presenting with confidence and the corporate communications team publishes much more about what LBTH is undertaking, what it is achieving and all the things we do well as Council we celebrate this through staff awards and through achievement of IIP silver accreditation. All these activities continue on a regular basis.	Amanda Harcus (HR)	Ongoing
A clear vision and the move toward outcome based measures across the council mean that staff can have clarity on how the work they undertake supports and contributes to the overall outcomes for LBTH	Amanda Harcus (HR)	Ongoing
<b>Recommendation 2:</b> That the council explores how it could work better with partners to develop its brand and support its communications.		
<ul style="list-style-type: none"> <li>• Key partners include Canary Wharf Group, in order to better incorporate the financial hub into the overall brand of Tower Hamlets.</li> <li>• Engage with partners through the Partnership Executive Group (PEG) in order to get buy in from a broad range of stakeholders outside of the authority.</li> </ul>		
We will continue to build our relationship and shard communications with Canary Wharf Group. If	Andreas Christophorou	Ongoing this financial year and

<p>possible, it would also be good to build relations with individual businesses and stakeholders in Canary Wharf.</p> <p>The council will start to build a central stakeholder database in Communications and Strategy Policy and Performance so we have a corporate knowledge of different stakeholders that we can segment. This work will take time and will include the Partnership Executive Group/Tower Hamlets Partnership businesses and organisations in Canary Wharf. We will need to liaise with services in the council to work with their stakeholders to sign them up to the new centralised database.</p> <p>In June the Divisional Director of Communications is presenting the findings of our place campaign research and will outline the next steps in promoting the borough including signing up their stakeholders to our new stakeholder database.</p> <p>Canary Wharf Group represents a key part of our Tower Hamlets place narrative and will be a key player in promoting the borough both in our upcoming ace campaign and outside it. We will encourage Canary Wharf Group and organisations that are a part of it use the name Tower Hamlets in their narratives.</p>	(Comms)	remaining two years of Communications Strategy.
<p>The Partnership Board, comprising of the Tower Hamlets Partnership, the Cabinet and the Council's Corporate Leadership Team is meeting on 26 June. The Board meeting will focus on the positive place campaign and identify opportunities for partners to support this work. The campaign will include a proposed launch event, branding suggestions and underpinning activities.</p>	Afazul Hoque (SPP)	June 2019
<p><b>Recommendation 3:</b> That the council use best practise examples from other boroughs and organisations to improve how we can better hear the voice of seldom heard groups, and ensure we hear all voices rather than just speaking to the 'gatekeepers'.</p>		
<ul style="list-style-type: none"> <li>• The London Borough of Hackney is an important best practise example, having suffered similar reputational challenges to Tower Hamlets in the last decade, and is a useful reference for the council as it embarks on its own journey and shapes the strategic direction of the Council.</li> <li>• Work with Hackney Borough to continue strengthening the work the council is doing around resident engagement</li> <li>• Explore other organisations to use for best practise examples</li> </ul>		
<p>The Divisional Director for Communications has shared Hackney's approach to mass public engagement with the Chief Executive, the Mayor and the Divisional Director of Strategy, Policy and Performance.</p> <p>The need to expand from broadcast communication to conversations with and reconnecting with our residents is one of two central themes in the new Corporate Communications Strategy.</p> <p>Tower Hamlets Council is currently working with Hackney on some of the creation of new brand guidelines for the council.</p>	Andreas Christophorou (Comms)	<p>Corporate Communications Strategy to be launched in June/July.</p> <p>Ongoing after that for this financial year and remaining two years of the strategy.</p>


<p>The Divisional Director of Communications and the Communications team will attend conferences and training to pick up best practice including case studies of award winning work by other councils. This has already begun. A representative from the Communications Team attending a Comms 2.0 Masterclass for Award winning communications.</p> <p>In addition, Best practice communications tools such as Granicus (electronic communication) and Orlo (social media) have been brought in and we will continue to work with those companies and other councils that have used them successfully, to ensure we get the most of them.</p>		
<p><b>Recommendation 4:</b> That the council provide a weekly update on the Member Hub about upcoming events and issues, which Members can send out to local residents via social media.</p>		
<ul style="list-style-type: none"> <li>• Members value the support they are offered to help them better communicate locally but feel more could be done to help them stay informed and act as ambassadors of the brand.</li> <li>• There would be value in introducing a weekly ward-specific briefing for all Members on upcoming events and issue in their wards. This would be in conjunction to the existing briefing that Members receive.</li> </ul>		
<p>The team is going to be reviewing the existing bulletin as part of the Strengthening Local Democracy work, and will ensure the social media friendliness gets added to that.</p>	<p>Matthew Mannion (Democratic Services/ Member Support)</p>	<p>Ongoing</p>
<p>Communications will ensure the new Corporate Communications Strategy including the new council and place narratives are put on the members hub and promoted to members to use through the Members Bulletin.</p>	<p>Andreas Christophorou (Comms)</p>	<p>Summer 2019</p>
<p><b>Recommendation 5:</b> That elected Members act as ambassadors of the council's brand and assist the communications team with outreach and consultation.</p>		
<ul style="list-style-type: none"> <li>• Amid the restructuring and the centralisation of the council's communications service in recent years, the service lacks the resources to execute full scale community outreach in the borough.</li> <li>• There is room for elected Members to facilitate more outreach and consultation.</li> </ul>		
<p>The new Corporate Communications Strategy is clear that officers (non comms) need to get out in the borough more to talk to residents. Communications will support them with strategic advice and materials.</p> <p>The Communications Team will continue to look for opportunities for outreach during consultations and campaigns where appropriate and where budget allows.</p> <p>Members can help to make a big impact in terms of outreach by helping to deliver the new Corporate Communications Strategy and giving elements of the place and council narratives to the public and others at every opportunity.</p>	<p>Andreas Christophorou (Comms)</p>	<p>Ongoing and key part of new Corporate Communications Strategy.</p>
<p>Members would be happy to help where they are given information to do so (subject to the usual political environment caveats).</p>	<p>Matthew Mannion (Democratic Services/ Member Support)</p>	<p>Ongoing</p>

<p>People running consultations need to make sure to include them when circulating information about these activities. I've recently seen a Consultation guidance brochure that Oduwa was working on. I did comment that more needed to be made of involving members in that so I would suggest you talk to her about what could be included in that.</p>		
<p><b>Recommendation 6:</b> That the council better utilize the communication function to inform and enable residents to engage in the lifecycle of its strategic and operational decisions making</p>		
<ul style="list-style-type: none"> <li>The council's culture toward resident engagement has not traditionally emphasised the importance of resident voices in the earliest stages of its decision making cycle and often will involve residents at a point when they have to inform or validate existing council decisions as opposed to having input from the inception of a project.</li> </ul>		
<p>It will be raised at CLT and with the Divisional Director of Strategy Policy and Performance, and promoted by Communications, that consultation on issues should be done at an early stage to cocreate solutions rather than to just pick options.</p> <p>A Consultation Hub will be procured which, for the first time, will put all consultations through an online portal. This will include new standards for consultation encouraging officers to engage earlier, make it easier for the public to see consultations and receive notifications for them and also make it easier for all council staff to see the intelligence gained from all consultations and use it In other work.</p> <p>Promotion of how to use the Consultation Hub and the high standards we expect will need to be done through internal communications by Communications and SPP.</p>	<p>Andreas Christophorou (Comms)</p>	<p>Ongoing.</p> <p>Consultation Hub and new standards to be launched by Q3</p>
<p><b>Recommendation 7:</b> That the communication team develop a digital tool to allow residents to share views and concerns</p>		
<ul style="list-style-type: none"> <li>Suggested tools for development include Commonplace, which is already used in some council functions, but such tools could be more widely applied.</li> </ul>		
<p>A Consultation Hub will provide a greater degree of consistency, lead to better promotion of consultations and also make it easier for all council staff to see the intelligence gained from all consultations and use it for research in other work.</p> <p>It will be overseen by Communications but used by services, using the new standards developed by SPP.</p> <p>The new Consultation Hub will include elements such as interactive maps where residents can drop pins and make comments. It will also be promoted through our Love Your Neighbourhood app.</p>	<p>Andreas Christophorou (Comms)</p>	<p>Ongoing.</p> <p>Consultation Hub and new standards to be launched by Q3</p>
<p><b>Recommendation 8:</b> That the council appoint a named lead Member for resident engagement</p>		
<ul style="list-style-type: none"> <li>The role of the Member would be in support of the Mayor's role, given that the Mayor is the current lead for resident engagement,</li> <li>The Mayor's Office is to select a Member to lead on engagement with residents in the borough.</li> </ul>		
<p>In response to the O&amp;S recommendation the Mayor included specific reference in the Cabinet responsibilities following the Council AGM on 15<sup>th</sup> May 2019 that as Mayor he holds lead</p>	<p>David Courcoux (Mayors Office)</p>	<p>May 2019</p>



responsibility for 'communications and resident engagement'.		
<b>Recommendation 9:</b> That the council ensures that data and intelligence from communications is being used strategically to plan within the council		
<ul style="list-style-type: none"> <li>Develop a plan to ensure data and intelligence are captured and used accordingly</li> </ul>		
<p>Data from the new Consultation Hub will be available for all officer to see and also used by SPP for research into new strategies and trends.</p> <p>Data from research commissioned by communications will be shared with officers such as information from the place campaign research.</p> <p>Progress in building the stakeholder database will be shared as services can work with communications to use them (within GDPR rules) to target messages as campaigns about specific issues to an interested audience. Note: We can only do this once we have developed a good number of stakeholders (50,000 to 100,000 plus) and we start segmenting them based on the issues they are interested in.</p> <p>Communications will promote new research by services outside Communications such as SPP. An example of this is the Annual Residents Survey.</p>	Andreas Christophorou (Comms)	Ongoing

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<p><b>Cabinet</b></p> <p>Wednesday 31 July 2019</p>	
<p><b>Report of:</b> Ann Sutcliffe, Corporate Director of Place</p>	<p><b>Classification:</b> Unrestricted</p>
<p><b>Proposed additions to the local list</b></p>	

<b>Lead Member</b>	<b>Councillor Rachel Blake, Cabinet Member for Planning, Air Quality and Tackling Poverty</b>
<b>Originating Officer(s)</b>	Michael Ritchie – Place Shaping Team Leader
<b>Wards affected</b>	Bethnal Green, Blackwall and Cubitt Town, Bow East, Bow West, Bromley North, Bromley South, Island Gardens, Poplar, Shadwell, Spitalfields and Banglatown, St Dunstan’s, St Katharine’s and Wapping St Peter’s, Weavers and Whitechapel.
<b>Key Decision?</b>	Yes
<b>Forward Plan Notice Published</b>	N/A
<b>Reason for Key Decision</b>	Impact on Wards
<b>Strategic Plan Priority / Outcome</b>	A borough that our residents are proud of and love to live in

## Executive Summary

The Tower Hamlets local list identifies buildings and structures that are considered to be of local importance due to their architectural, historical and townscape significance. In September 2017, the council adopted selection criteria and a public nomination process to help determine the suitability for further buildings and structures to be added to the list.

Forty-one buildings have been identified as being suitable for inclusion on the local list. Four of these were nominated by members of the public and thirty-seven are historic public houses (and some associated buildings) that have been identified by officers. A public consultation was held to seek views on the proposed inclusion of

these buildings on the local list. Following careful consideration of the responses received, officers recommend that all of the forty-one buildings are added to the local list.

## **Recommendations:**

The Mayor in Cabinet is recommended to:

1. Approve the proposed additions to the local list.

### **1. REASONS FOR THE DECISIONS**

- 1.1 The council's Conservation Strategy (2017) recognises that the boroughs heritage is an irreplaceable legacy that is intrinsic to the character of Tower Hamlets, and makes it a unique and distinctive place. It also recognises that heritage makes a significant contribution to the borough as a welcoming place to live, work and visit, delivering long-term benefits for the social and economic well-being of Tower Hamlets. The proposed additions to the local list will give recognition to valued heritage assets and will help to ensure that they are protected and enhanced, so that they can be appreciated and enjoyed by future generations.

### **2. ALTERNATIVE OPTIONS**

- 2.1 It may be decided to not add all, or some of, the proposed buildings to the local list. If this were the case, the buildings would still be considered to be undesignated heritage assets, and their heritage value would still be taken into account in planning decisions. However, they would not have the formal recognition of being identified on the council's local list.

### **3. DETAILS OF THE REPORT**

#### **The local list**

- 3.1 The Tower Hamlets local list identifies buildings and structures that, whilst not statutorily listed for their national importance, are considered to be of local importance due to their architectural, historical and townscape significance. Inclusion on the local list does not result in additional consent requirements over and above those required for planning permission. However, local listing is a way of identifying a building or structure as a non-designated heritage

asset and, as such, its significance will be a material consideration in planning decisions. The NPPF requires local authorities to consider the impact of development on the significance of non-designated heritage assets when determining planning applications, balancing the scale of any harm or loss and the significance of the asset.

- 3.2 Tower Hamlets has had a local list in some form since the early 1980s. It initially included many of what were at one time referred to as Grade III Buildings, which were those that were considered for statutory listing but did not make the final selection. Other buildings have been added on a piecemeal basis. For example, a number of buildings were added to the list at the time that the Limehouse Cut Conservation Area was designated. More recently, forty-four war memorials were added as part of a thematic review marking the centenary of the start of World War I. There are currently 213 entries on the list in total.

#### **Justification for adding to the list**

- 3.3 The need to review and add to the local list was raised in a motion at the meeting of Council on 20 January 2016, where it was resolved (inter alia) that the council should establish a process to enable local residents to propose additions to the local list and also to revise the existing local list, with a particular focus on adding historic public houses. This is reflected in objective 2.7 of the council's Conservation Strategy, which states that we will aim to review the local list and consider the desirability of extending it.
- 3.4 In September 2017, the council adopted a local list nomination and selection process. This sets out the criteria for selecting buildings for inclusion on the list and how members of the public can propose additions. Nominations for the local list can be made throughout the year. Officers will review nominations on the first of October each year and will refer appropriate ones to the local list selection panel. A six week public consultation will be held before a final decision is made, by Cabinet, about which buildings will be added to the local list.

#### **Selection of proposed additions**

- 3.5 It is proposed to add forty-one buildings to the local list, details of which can be found in Appendix 1. Four of these were nominated by members of the public and thirty-seven are historic public houses (and some associated buildings) that have been identified by officers.
- 3.6 Twenty buildings were nominated by the public, including ones put forward during the public consultation on the nomination and selection process, which took place from 11 November 2016 to 31 January 2017, along with suggestions that had been made previously and held on file. Details of the

nominated buildings can be found in Appendix 2. Fifteen of the nominated buildings are located in conservation areas. Buildings in conservation areas already benefit from a good degree of protection in the planning system; they cannot be demolished without planning permission and certain permitted development rights have been removed. Furthermore, there is a danger that by locally listing buildings within conservation areas on an ad-hoc basis the significance of other equally valuable buildings within the area may appear to be downgraded. For these reasons, it has been decided that buildings within conservation areas should not be added to the local list.

- 3.7 One of the nominated buildings, the Poplar gasholder, was dismantled before the nomination shortlisting took place. Parts of the gasholder have been retained and will be re-used in the landscaping of the redeveloped site. The nomination of the gasholder will be carried forward and the retained parts of the structure will be recommended for inclusion on the local list once they have been reinstated on site.
- 3.8 The remaining four nominations were assessed against the selection criteria and were all considered to be worthy of inclusion on the local list. In accordance with the adopted nomination process, these proposed additions were reviewed by an independent local list selection panel, which includes members of the Conservation and Design Advisory Panel and a representative from Historic England. The panel endorsed the inclusion of these buildings on the local list.
- 3.9 Officers also carried out a review of public houses to identify those suitable for inclusion on the local list. For the reasons outlined in paragraph 3.6 above, officers limited the scope of the review to public houses located outside of conservation areas. The review identified thirty-four buildings that are considered to meet the local list selection criteria. Three of these public houses have buildings directly connected to them, which contain separate businesses and have separated addresses but are nonetheless integral to the significance of the adjacent public house. It is therefore proposed to add these ancillary buildings to the local list as well.

#### **Consultation on the proposed additions to the local list**

- 3.10 A public consultation on the proposed additions to the local list took place between Monday 11 February and Sunday 24 March 2019. The consultation was advertised on the council's website and two drop-in sessions were held where the consultation documents were displayed and officers were available to answer questions. Letters were sent to each of the buildings that are proposed to be added to the list; both to the address of the building itself and to the address of the registered owners (obtained from a land registry search).

Emails were sent to relevant amenity societies and Members were notified through the Members bulletin.

- 3.11 In response to the consultation, a letter was received from a member of the public (who had nominated two of the proposed additions) to state that they also supported the proposed addition of the other buildings.
- 3.12 Representations were also received from the owner of six of the public houses; supporting the inclusion of two of them on the local list but objecting to the inclusion of the other four as it was considered that they did not sufficiently meet the selection criteria. The Borough Conservation Officer has reviewed these representations and has concluded that, notwithstanding the comments, the buildings are considered to meet selection criteria and are good examples of the boroughs historic public houses and are worthy of inclusion on the local list. A summary of the consultation comments, and the council's response to these, can be found in Appendix 3.

#### **4. EQUALITIES IMPLICATIONS**

- 3.13 An equalities assessment was carried out at the time that the local list nomination and selection process was formerly adopted. Officers will continue to monitor the implementation of this process to ensure that actions are undertaken to mitigate the likely impacts on the equality profile of those affected.

#### **5. OTHER STATUTORY IMPLICATIONS**

- 5.1 There are no other statutory implications.

#### **6. COMMENTS OF THE CHIEF FINANCE OFFICER**

- 6.1 This report provides an update on the results of the public consultation into the proposed addition of various properties to the Local List and seeks the approval of the Mayor in Cabinet to the inclusion on the list of the properties detailed in Appendix 1.
- 6.2 There are no specific financial implications arising directly from this report. All officer time involved in reviewing and updating the Local List has been financed from within existing budgetary provision, as have been the costs of consultation.
- 6.3 Inclusion of a building on the Local List does not place any statutory responsibility on the property owner in terms of maintenance, repair or reinstatement of features. The listing does however ensure that the property's

significance will be a material consideration in determining future planning decisions. This will apply equally to Council owned sites and although none of the specific properties considered in this report are Council assets, other properties that are already included on the Local List are. The implications of this heritage status should therefore be considered as part of any future development proposals of affected Council sites.

## **7. COMMENTS OF LEGAL SERVICES**

- 7.1 The legal position is set out in paragraph 3.1 above. Under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects statutorily (by Secretary of state) listed buildings or their settings, the local planning authority must have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest it possesses. A Locally Listed Building is a building, structure or feature which, whilst not listed by the Secretary of State, has been designated an important part of the Council's heritage due to its architectural, historic or archaeological significance.
- 7.2 As with Statutory Listed Buildings, any works carried out should preserve or enhance the building and any features of architectural or historic interest retained and appropriate materials used. Inclusion in the local list does not give the building any statutory protection, but the fact that a building or site is on a local list means that its conservation as a heritage asset is an objective of the NPPF and a material consideration (not a statutory consideration) when determining the outcome of a planning application. MAB will need to consider what effect a local listing of each asset might have on discouraging or encouraging developments in the vicinity of the heritage asset.

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## **Linked Reports, Appendices and Background Documents**

### **Linked Report**

- NONE

### **Appendices**

- Appendix 1: Proposed additions to the local list
- Appendix 2: Local List Nominations
- Appendix 3: Summary of consultation comments with LBTH responses



**Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012**

- NONE.

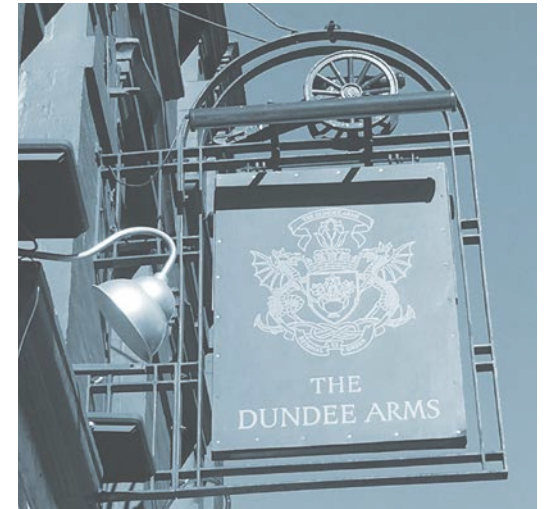
**Officer contact details for documents:**

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# TOWER HAMLETS LOCAL LIST new additions

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# INTRODUCTION

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## Background

The NPPF (2018) states that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance so they can be enjoyed for their contribution to quality of life for current and future generations. Plans should set out ‘a positive strategy for the conservation and enjoyment of the historic environment’.

Tower Hamlets has around 2,000 statutorily listed buildings and 58 conservation areas. There are also a large number of non-designated heritage assets, which include locally listed buildings.

The Council is consulting on additions to the Tower Hamlets Local List. The Local List document identifies buildings and structures that, whilst not statutorily listed for their national importance, are considered to be of local importance. Recognition in the Local List is a material consideration in the planning process when planning permission is required.

## Criteria for Listing

Historic England provides guidance on local heritage listing in accordance with relevant policy contained in the NPPF. The document ‘Listing: Historic England Advice Note’ sets out the proposed process for nominating and selecting additions to the Local List and the level of information required which includes location details, information relating to the buildings local significance and photographs.

The Heritage England Advice Note also sets out the criteria for local listing. It states that to be considered for inclusion on the Local List nominations should contribute to local character and distinctiveness and a minimum of two other criteria:

- Local Character and Distinctiveness
- Architectural significance.
- Historical significance.
- Artistic significance.
- Age, rarity and integrity.
- Social significance.

## New Additions

This document outlines proposed additions to the Local List. The first group of buildings are Public Houses located outside Conservation Areas. The second smaller group includes three buildings associated with a public house that forms part of a group listing. The third group are those selected through the Tower Hamlets Local List Nominations and Selection Process.

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## Public Houses in Tower Hamlets

Public Houses have been an important focus for community life within both the urban and rural communities of Britain for centuries. Though many pubs have closed over the last decade, Tower Hamlets is fortunate to retain a rich variety. Accordingly, this document outlines public houses of local importance across the Borough and the reasons for their inclusion in the Local List.

Public houses are often located on street corners, sometimes forming a local landmark which is important in terms of wayfinding.

Several smaller pubs are located within or at the end of terraces of commercial or residential properties. The upper floors of these pubs generally reflect the architecture of the terrace but the ground floors are distinctive. Unlike shopfronts which have usually been subject to much change, they tend to retain original or historically interesting features.

Victorian Gin Palaces with ornate, well lit, dazzling warm and welcoming interiors were a feature of the capital. Whilst the fabulous cut and bevelled glass windows and huge projecting gas lamps have gone, the exteriors of these pubs are notable for the wealth of architectural decoration, large windows and tall floor to ceiling heights of the ground floor.

Many pubs within the Borough were rebuilt in the years between the two world wars. Usually built of brick, the exteriors of these pubs reflected changing architectural tastes in a move away from the

more decorative styles which had been popular before World War I. Though more austere, the exterior of these pubs often feature high quality beige or cream tilework and metal framed windows.

The exteriors of urban pubs sometimes feature three or more separate entrance doors which were originally intended to serve different bars - separated from each other by decorated glazed screens. Very often some of the entrance doors are fixed shut, reflecting the fact that internal subdivisions have been removed as fashions have changed and also the fact that one large space was found easier to supervise.

The ground floor facades of many pubs are faced with glazed bricks, these were washable and durable but also made the frontage visually distinct from adjacent shops and houses. In some cases, the entire facade is covered with glazed bricks. In some cases the tiles were applied to an older building in an effort to update the exterior.

The name of pubs was sometimes incorporated into the exterior architectural treatment, perhaps within a blocking course above the cornice or within decorative tilework.

The public houses on the draft local list are all located outside conservation areas.

The Castle Public House was nominated both through both public nomination and the review of public houses in the borough. Accordingly, it is recorded in this document twice.

## ANGEL OF BOW (FORMER DEVON STORES/LIQOUR INN)

**Ward:** Bromley South

**Address:** 171 – 173 Devons Road, E3 3QX

The Pub was originally named the Devon Stores, then the Liquor Inn and now, after a period of closure, The Angel of Bow. It is a detached building dating from the interwar period which replaced an earlier public house.

This building is locally listed for its:

- Local Character and Distinctiveness

The building makes a positive contribution to the local character and distinctiveness, serving as a local landmark within the wider townscape.

- Architectural Significance

The architectural form of the building is quite complex being part two storey with a prominent pitched roof with a later single storey section with a flat roof. The odd side angle of the two storey section may well relate to former property boundaries. Much of the exterior is rendered and painted unlike many public houses of the period, which feature exposed brickwork.

The ground floor front of the older part incorporates areas of faience tiles now painted. Paint has been applied directly to the brickwork of the single storey element in recent years.

The roof is covered with distinctive clay pantiles, a roofing material popular in the interwar years. The tall stepped chimney stack, facing the entrance to a vehicular entrance to the Perring Estate, is a distinctive feature. The original, probably metal, window frames have been lost from the first floor but overall the building exterior retains much of its original character.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries





## BANCROFT ARMS

**Ward:** St Dunstan's  
**Address:** 410 Mile End Road, E1 4RQ

The Bancroft Arms dates from the interwar period and is one of the many Truman's public houses in the Borough.

This building is locally listed for its:

- Local Character and Distinctiveness

The building is a local landmark and a distinctive remnant of the historic character of Mile End, particularly due to the lettering incorporated into the facade along both Harford Street and Mile End Road.

- Architectural Significance

The exterior of the building, at the corner of Mile End Road and Harford Street, is well detailed and little changed. The building is of two floors with additional accommodation within the tile covered mansard roof. The upper floor box sash windows, prominent stone cornice and tall chimneys recall Queen Anne architecture.

The ground floor is typical of many Truman public houses with elegant lettering incorporated into the faience at fascia level advertising 'ALES STOUT AND WINES' along the Harford Street facade with 'BURTON BITTER' and 'LONDON ALES' along Mile End Road as well as the name of the brewery. A distinctive 'TRUMAN BEERS' illuminated sign is positioned at parapet level on the Harford Street facade.

Like most 1930's buildings the brickwork is of good quality; the large faience tiles, another typical interwar detail, on the exterior of the ground floor appear to have been painted over.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries



## THE BAR LOCKS (HORSE & GROOM)

**Ward:** Whitechapel

**Address:** 21 Whitechurch Lane, E1 7QR

There has been a public house on this site, at the corner of Whitechurch Lane and Manningtree Lane since the mid eighteenth century but the existing building appears to date from the late nineteenth century. The pub was previously named the Horse & Groom but was renamed the Bar Locks in 2006.

This building is locally listed for its:

- Local Character and Distinctiveness

The public house occupies an impressive corner building and serves as a local landmark in the townscape.

- Architectural Significance

Although the brickwork has been painted and the upper floor sashes and ground floor windows replaced, the Bar Locks remains an impressive nineteenth century corner building. Other changes include the painting over of the glazed bricks covering the stallriser and pilasters, the loss of the double corner doors and the simplification of the fascia arrangement over the ground floor windows.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries



## BAR VALIENTE/ COUPETTE

**Ward:** St Peter's  
**Address:** 423 Bethnal Green Road, E2 0AN

The public house at 423 Bethnal Green Road is a narrow three storey building with a mansard roof. The pub was opened prior to 1870 as the Albion, it was later called the Bohola, then Bar Valiente in 2014 before becoming Coupette in 2017.

This building is locally listed for its:

- Local Character and Distinctiveness

The public house is a significant feature in the wider townscape. The building rises above the terrace of shops within which it is located, the terrace including buildings of various dates.

- Architectural Significance

The name of the brewery CHARRINGTON'S with ALES and STOUT is displayed in well formed capitals on a white faience fascia; there are also white faience pilasters and corbels. The most distinctive remaining historic feature of the pub facade is the large horizontal plaque located between the first and second floor windows, it appears to relate to Charrington's brewery.

Whilst the overall historic form of the building remains, much of the historic detail of the exterior has been lost. The windows were originally timber sash with glazing bars dividing the windows into small panes, the dormer was divided into three equal sized sashes and the ground floor was simple and elegant with a central door and leaded lights.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries



## THE BEEHIVE

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**Ward:** Bromley South

**Address:** 104 – 106 Empson Street, E3 3LT

The Beehive, an interwar building located at the junction of Empson Street and Brickfield Road, replaced an older public house.

This building is locally listed for its:

- Local Character and Distinctiveness

The Beehive is a key building in the townscape, which is generally a mix of industrial warehouses and more contemporary housing.

- Architectural Significance

The building has a rather severe appearance with a flat roof which is entirely concealed behind a parapet. The ground floor facade to Empson Street is of stone incorporating a distinctive canted bay window; on the Brickfield Road elevation the stone is confined to below ground floor cill level. A brick soldier course runs along the building at ground floor cill level and is employed at first floor level over the windows. There is projecting band of brick at cornice level. The quality of the distinctive dark brickwork contrasting with the white mortar is an attractive feature.

The first floor window frames have been changed.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries



# BLACK HORSE

**Ward:** Whitechapel  
**Address:** 40 Leman Street, E1 8EU

The four storey public house with ground floor extension is located at the junction of Leman Street and Alie Street.

This building is locally listed for its:

- Local Character and Distinctiveness

The corner pub is a key local landmark in the townscape.

- Architectural Significance

The ground floor extension has been much altered. The upper floors have simple timber sliding sash windows. The only decoration on the upper floors is a simple string course between second and third floors and gauged red brick arches over the windows contrasting to the London stock brick of the building.

The public house was included by Pevsner in his volume on 'East London', describing it as 'low-key 1840's with extended ground floor'.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries



## THE BOW BELLS PUBLIC HOUSE

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**Ward:** Bromley North

**Address:** 116 Bow Road, E3 3AA

The Bow Bells is a fine three storey Victorian public house on Bow Road. The building dates from the 1860's and is designed in a Gothic Italianate style.

This building is locally listed for its:

- Local Character and Distinctiveness

The Bow Bells Public House features one of the most distinctive pub facades in the Borough and forms part of a fine Victorian group which includes Bromley Hall and the former Police Station at 116 Bow Road, both listed at Grade II. The building is in the location of the Fairfield Road Conservation Area.

- Architectural Significance

The ground floor facade includes massive pilasters with ornate capitals and corbels which feature bunches of grapes. The original window mullions survive on each floor although the engraved, cut glass windows which would have graced the ground floor bar windows have been lost. Coloured bricks are used above the first and second floor windows. Overall, the facade is remarkable for the wealth of detail that has survived.

The building is described in Pevsner's East London as a 'pub of 1860's: Gothic Italianate with triplets of pointed windows on the first floor'.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



## THE CASTLE

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**Ward:** Whitechapel  
**Address:** 44 Commercial Road, E1 1LN

The Castle is a three storey mid nineteenth century public house on a triangular site at the junction of Commercial Road with Goodman's Stile and Alie Street.

This building is locally listed for its:

- Local Character and Significance

The building is an important local landmark and a key feature in views towards the City.

- Architectural Significance

Original sash windows and decorative surrounds including distinctive curved prow marks survive on the upper floors. The ground retains many original features including fine pilasters with intricate capitals. The original cornice detail at the top of the building has been lost.

Pevsner mentions the building in his East London volume, describing it as 'a stuccoed mid-C19 pub with rounded end.'

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



## THE DEAN SWIFT

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**Ward:** Shadwell

**Address:** 2-6 Deancross Street, E1 2QA

The Dean Swift, off Commercial Road, bares all the hallmarks of a 1930's public house but was actually built in the later 1940's, replacing an earlier pub.

This building is locally listed for its:

- Local Character and Distinctiveness

The Public House makes a positive contribution to local character and distinctiveness. It is also within the setting of the Commercial Road Conservation Area.

- Architectural Significance

The central section of the facade projects and is symmetrical with two entrance doors; a third entrance is located to the right. It has a dominant, clay tiled, pitched roof with flat top with flat roofs to each side that are hidden by parapets. The central section of the ground floor is faced with ceramic tiles including green tiles which recall pubs of the Victorian period, the tiles have now been painted over. The upper floor metal windows have been replaced.

The building was originally connected to other buildings on either side.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.





## DOG & TRUCK

**Ward:** Whitechapel  
**Address:** 72 Back Church Lane, E1 1LX

The Dog and Truck is a 1930's brick pub, rebuilt in conjuncture with the adjoining Berner Estate. It is notable for its 'Arts and Crafts spirit'.

This building is locally listed for its:

- Local Character and Significance

The pub is an intrinsic component of the local area as it was rebuilt in 1935 by William Stewart to coincide with the start of the adjoining Berner Estate. The adjacent Everard House in Ellen Street, dates from 1934-6.

- Architectural Significance

The Dog and Truck's distinctive facade to Back Church Lane is symmetrical with the ground floor incorporating four original doors to the various bars within. The doors are located between three bay windows. The brickwork is of good quality and the various details including box sash windows and very pronounced overhanging eaves are well handled. The positioning of the upper floor windows is unusual.

Pevsner, in his volume on East London, notes that the tiled roof and big chimneys and says that the building has 'Arts and Crafts spirit'.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



## DUNDEE ARMS

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**Ward:** St Peter's

**Address:** 339 Cambridge Heath Road, E2 9LH

The Dundee Arms is a nineteenth century building originally part of a varied terrace that replaced an earlier public house.

This building is locally listed for its:

- Local Character and Distinctiveness

The Public House is a key feature in the street scene, rising above the adjoining properties. It is also located in the setting of the Bethnal Green Gardens Conservation Area

- Architectural Significance

The Dundee Arms was originally part of a terrace although now much of the southern flank is exposed to view.

The pub is of three tall storeys with three sash windows on the first and second floors. The upper floor facade incorporates various decorative architectural features. Elements of the original decoration survive around the ground floor entrance. A historic mosaic fascia sign bearing the name of the pub was recently uncovered.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



## ELEANOR ARMS

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**Ward:** Bow East

**Address:** 460 Old Ford Road, E3 5JP

The Eleanor Arms is a prominent interwar corner building along Old Ford Road with typical 1930's features that replaces an older public house. The overall block includes a separate newsagents shop and this is therefore locally listed (see new additions to local list).

This building is locally listed for its:

- Local Character and Distinctiveness

The pub occupies a prominent position in the townscape and the architectural style reflects that of the adjacent Ranwell House. The building is also located in the setting of the Victoria Park Conservation Area.

- Architectural Significance

This prominent interwar corner building replaces an older public house. The three storey front block has a steep pitched roof with a narrow side gable and lower two storey section facing Ranwell Street.

The exterior is of brick with faince tiles on the ground floor exterior. The upper floors of the front facade are symmetrical with a slightly raised central section. The building incorporates elements of the original metal windows with horizontal glazing bars, features typical of 1930's architecture.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.





## THE GEORGE

**Ward:** Blackwall and Cubitt Town  
**Address:** 114 – 114a Glengall Grove, E14 3ND

The George dates from 1932 and was built for the brewers Watney Coombe Reid by HC Horswil Ltd of Forest Gate.

This building is locally listed for its:

- Local Character and Distinctiveness

It is a key feature in the townscape and a distinctive remnant of the historic character .

- Architectural Significance

The building exterior is remarkably well preserved. It is a rather severe block with a narrow symmetrical south facade and a wider symmetrical west facade. The roof is entirely hidden behind a parapet. The lower part of the walls is of glazed brick. The original neo Georgian sash windows survive at first floor level; the ground floor retains the original window frames with leaded upper lights but the lower parts of the windows probably originally incorporated ground glass for privacy. The brickworks is of very good quality. Pevsner describes the style as ‘domestic neo-Georgian’. The present building replaced a large and imposing hotel built in 1865 which itself replaced an earlier building. The pub was rebuilt and re-named “The George” in the mid-nineteenth century, it is first mentioned in 1859. It was of considerable size and used by sea-captains in charge of ships docked nearby.

- Social Significance

The original Millwall Football Club played on waste ground close to the pub from 1885 to 1890, when they moved to East Ferry Road. A newspaper advertisement of 1899 shows that the pub was used as a meeting place by the Amalgamated Society of Engineers, and the Boilermaker’s Society, among other groups. In 1959 the film star Jayne Mansfield visited the pub. Of the dockers who were there in great numbers to see her she said, “They are so sweet”.

## THE HARE

**Ward:** St Peter's  
**Address:** 505 Cambridge Heath Road, E2 9BU

A pub has been present in this location since 1800 but this is partially obscured by an early twentieth century projecting ground floor.

This building is locally listed for its:

- Local Character and Distinctiveness

The corner building makes a positive contribution to local character and distinctiveness and is located in the setting of the Regent's Canal Conservation Area

- Architectural Significance

The ground floor incorporating classical inspired details is of faience (a type of glazed cladding material). The older upper facade is of brick with three large windows. The parapet partially conceals the lower slope of a mansard roof and three dormer windows.

The original brickwork is concealed by white paint and the historic brick lintels by black paint. The first floor sash windows and dormer window frames have been replaced to the detriment of the appearance of the building. The ground floor window and door frames appear to be original.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.





## HOPE & ANCHOR

**Ward:** Poplar

**Address:** Newby Place ,E14 0ES

The present public house dates from 1938 although the building replaced an earlier public house. As a result of bomb damage, the building and neighbouring properties vary in age.

This building is locally listed for its:

- Local Character and Distinctiveness

The building is a distinctive remnant of the historic character of the area. The buildings on both sides of the southern part of Newby Place were badly damaged by bombing in World War II and were demolished with the exception of the Hope & Anchor which itself was damaged

- Architectural Significance

The present building dates from 1938 and was designed by Stewart & Hendry of Fenchurch Street, replacing an earlier pub. As a result of bomb damage, parts of the building date from the 1950's or earlier 1960's.

Overall the pub retains a 1930's appearance with a simple red brick facade and metal window frames to the upper floors.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.

## HORN OF PLENTY

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**Ward:** Bethnal Green  
**Address:** 36 Globe Road, E1 4DU

The Horn of Plenty is a handsome late nineteenth corner public house that replaced an earlier establishment.

This building is locally listed for its:

- Local Character and Distinctiveness

The corner building makes a distinct contribution to the wider townscape and is located in the settings of the Carlton Square Conservation Area and the Stepney Green Conservation Area.

- Architectural Significance

The building is of two storeys with a well-proportioned mansard roof incorporating tall narrow dormer windows. The roof also features prominent chimney stacks. The building survived post-war redevelopment of the area and stands at back of pavement line, forward of the later building line. The ground floor originally had five doors leading to the various bars; three of the doors are now blocked. The original ground floor window frames survive with distinctive decorative panels beneath them. The windows would originally have incorporated highly decorated glass. A band of decoration including terracotta blocks runs around the building above the first floor windows.

The first floor and dormer window frames have been replaced.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



## HUNGERFORD ARMS

**Ward:** Shadwell  
**Address:** 240 Commercial Road, E1 2NB

The Hungerford Arms is a mid-nineteenth century corner public house at the junction of Commercial Road and Hungerford Street.

This building is locally listed for its:

- Local Character and Distinctiveness

The public house is a distinctive feature in the wider streetscape.

- Architectural Significance

The building is of three storeys with a projecting ground floor to Commercial Road and a lower section to the rear. This unassuming end of terrace pub represents a type which was once common but is now increasingly rare.

The first and second floor front facade facing Commercial Road was updated in the interwar period with the addition of faience tiles, now painted over, incorporating distinctive fluted details in vertical strips giving subtle vertical emphasis – a quiet subtle echo of the moderne style then popular, particularly on Cinema buildings.

One of the former entrance doors on the splayed corner is now blocked. The ground floor brick columns, probably originally of glazed bricks, have been painted over.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.





## INDO (FORMER BLUE ANCHOR)

**Ward:** Spitalfields and Banglatown

**Address:** 133 Whitechapel Road, E1 1DT

The former Blue Anchor, renamed Indo in 2000, is a distinct narrow building dating from 1860.

This building is locally listed for its:

- Local Character and Distinctiveness

The public house makes a significant positive contribution to character of the historic street, particularly through its decorative features and distinctive arched windows.

- Architectural Significance

The building dates from 1860, it is a tall narrow building fronting onto one of the Borough's most important historic streets. The upper floors each feature three arched sash windows with much decorative, classically inspired detail typical of mid Victorian architecture. The ground floor exterior, altered in the earlier 20th C, is attractive, incorporating leaded glass windows and a distinctive arched central window.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



## KINGS ARMS

**Ward:** Weavers

**Address:** 11a Buckfast Street, E2 6EY

The Kings Arms is an imposing Victorian corner public house at the junction of Buckfast Street and Derbyshire Street.

This building is locally listed for its:

- Local Character and Distinctiveness

The public house is a distinct building within the townscape and stands well forward of the post war rebuilding line on either side.

- Architectural Significance

The exterior walls of the late Victorian building are little changed apart from the large leaded ground floor windows which do not appear to be original. An additional floor has recently been added, set back from the original facade behind a decorative parapet. The ground floor has three separate public entrances including one on the angled corner. The first and second floors feature multiple sash windows in groups of two and three. The treatment of the first and second floor window surrounds differs, more decoration being included over the first floor windows with simpler details over the window heads of the upper floor.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



## LIGHTHOUSE (FORMER ICELAND) PUBLIC HOUSE

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**Ward:** Bow East  
**Address:** 421 Wick Lane, E3 2JG

The Lighthouse Public House, formally The Iceland, is located at the corner of Wick Lane and Iceland Road.

This building is locally listed for its:

- Local Character and Distinctiveness

The public house is a distinctive remnant of the historic character of the area, recalling the overall form and scale of lost domestic properties. However, all of the original windows and doors have been replaced and the original cornice which ran along part of the top of the building has been removed.

- Historic Significance

It is described in Pevsner's East London as 'a typical workers pub' but by 2005 when the book was published the area was changing rapidly and many of the former industrial jobs which once characterised this area had already disappeared.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



## LORD MORPETH

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**Ward:** Bow West

**Address:** 402 Old Ford Road, E3 5NR

This two storey brick public house at the corner of Old Ford Road and Ford Street survived post-war redevelopment of the area;

This building is locally listed for its:

- Local Character and Distinctiveness

The public house is a distinctive remnant of the historic character of the area surviving the post war redevelopment that replaced the surrounding buildings. It was previously connected to a terrace of buildings fronting Old Ford Road which originally concealed the now, highly visible, side gable from view. The building is located in the setting of the Victoria Park Conservation Area.

- Architectural Significance

The building is of London stock brick with red brick dressings to quoins and first floor window surrounds of the Old Ford Road facade. The ground floor exterior of the bar areas incorporates very attractive earlier twentieth century brown/gold glazed bricks with bands of very narrow black tiles. The front to Old Ford Road is symmetrical and incorporates three separate entrance doors.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



# MARQUIS OF CORNWALLIS

**Ward:** St Peter's  
**Address:** 304 Bethnal Green Road, E2 0AG

The Marquis of Cornwallis is located at the junction of Bethnal Green Road and Vallance Road.

This building is locally listed for its:

- Local Character and Distinctiveness

The public house is a significant feature in the wider streetscene.

- Architectural Significance

It is three storeys to Bethnal Green Road with a lower two storey element to Vallance Road. A projecting cornice survives at the top of the building.

The ground floor was updated in the earlier twentieth century by the addition of faience tiles – a black base with lighter coloured tiles above. The tilework includes classical elements including capitals to the columns and a cornice at fascia level. The name of the pub is incorporated in the tile work.

The building is included in Pevsner's East London where it is described as 'a large pub of c.1850, plain stucco with curved corner'.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



## MISTY MOON / THE BETHNAL GREEN TAVERN

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**Ward:** St Peter's

**Address:** 456 Bethnal Green Road, E2 0AG

Located at the corner of Bethnal Green Road and Ainsley Street, The Bethnal Green Tavern (formerly known as Misty Moon, the Camden's Head and before that the Lord Camden) was established c1766.

This building is locally listed for its:

- Local Significance

The corner public house is a key feature in the wider streetscene.

- Architectural Significance

A public house in this location was established in 1766 but was rebuilt, probably in 1864 by Edward Brown. The main facade is painted with decorative stucco window surrounds, quoins and cornice. The projecting ground floor with polished granite piers is a later addition.

The building is included in Pevsner's volume on East London

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



## OLD GEORGE

**Ward:** St Peter's  
**Address:** 379 Bethnal Green Road, E2 0AN

Located at the junction of Bethnal Green Road and Canrobert Street, the Old George has a long history.

This building is locally listed for its:

- Local Character and Significance

The public house is reminiscent of the historic character of Bethnal Green Road including a as the building was part of an imposing three storey block which also incorporated a shop, no. 381a Bethnal Green Road.

- Architectural Significance

An earlier public house in this location was rebuilt in 1880 by Edward Brown as part of a larger block.

The upper floor windows have fine architectural surrounds including gabled and curved pediments to the first floor windows. The corners of the block are emphasised by decorative quoins and the top is marked by a fine decorative balustrade. The side elevation is very plain and unusually for a corner pub there does not appear to have been an entrance on the corner.

The pub is mentioned in Pevsner's volume on East London where he contrasts it with the more elaborate Star of Bethnal Green, 'the simpler type of pub is found at the stucco trimmed and balustraded Old George.'

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



## PERSEVERANCE

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**Ward:** St Peter's  
**Address:** 110 – 112 Pritchards Road, E2 9AP

The Perseverance is an interwar two storey pub which replaced an earlier pub on Pritchard Road adjacent to the Cat and Mutton Bridge.

This building is locally listed for its:

- Local Character and Distinctiveness

The Perseverance is reminiscent of the historic character of the area and also a key feature in the wider townscape as it appears to date from the same time as the adjacent estate.

- Architectural Significance

The public house is a relatively simple domestic design without any grand external features.

The original ground floor doors and windows survive along with rich green and beige tiles to the exterior of the ground floor. The original Crittall type first floor windows also survive. A simple band of stone marks the cornice level. The original roofing material has been removed and replaced with concrete tiles. There are three ground floor doors.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.





## PIER TAVERN

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**Ward:** Island Gardens  
**Address:** 299 Manchester Road, E14 3HN

The Pier Tavern, located on the corner of Manchester Road and Pier Street was built by Charles Davis in 1863. In 2018, planning permission was granted for the remodelling of the public house and the construction of a four storey extension to provide nine self-contained dwellings.

This building is locally listed for its:

- Local Character and Distinctiveness

The public house is reminiscent of the historic character of the area and a key feature in the townscape. The building now stands well forward of the general post war building line and is surrounded by later redevelopment.

- Architectural Significance

The Pier Tavern was built by Charles Davis in 1863 alongside two other public houses in Cubbitt Town, the Manchester Arms and London Tavern, which have both been demolished.

This well proportioned building which appears to retain all of its original external details, except the ground floor windows, is an important reminder of the history of Cubbitt Town.

In his volume on East London, Pevsner states that the area has ‘all been rebuilt from Cubitt’s time apart from a couple of pubs’ one of which is The Pier Tavern. Social

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



## PRINCE REGENT

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**Ward:** St Dunstan's  
**Address:** 81 Salmon Lane, E14 7PR

The Prince Regent is an earlier twentieth century building replacing an earlier pub located on the corner of Salmon Lane with Brenton Street and Yorkshire Road.

This building is locally listed for its:

- Local Character and Distinctiveness

The public house is a distinctive remnant of the historic character of the area as the building once formed the end property of a terrace.

- Architectural Significance

The Prince Regent is a narrow three storey building with a projecting ground floor, formerly part of a terrace. The upper floor of stark red brick, possibly date from partial rebuilding, they are only relieved by large simple lintols over the four windows crowded onto the front elevation and two windows on the long bare side elevation to Brenton Street.

The ground floor projecting front is covered with decorative glazed tiles including the handsome lettered tiles at fascia level bearing the name of the pub and the street number. Below fascia level the tiles to the pilasters and stall riser have been painted over.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



## PRINCESS OF PRUSSIA

**Ward:** Whitechapel  
**Address:** 15 Prescot Street, E1 8AZ

The Princess of Prussia is a handsome public house, built around 1880 featuring particularly distinctive glazed tile decoration, much of it revealed recently following the removal of later signboards. It is one of the many Truman's public houses in the Borough.

This building is locally listed for its:

- Local Character and Distinctiveness

The Public House makes a positive contribution to the wider townscape and the setting of neighbouring heritage assets. The building forms an attractive contrast with the superb brick 1930's former Co-operative Wholesale Society office block and 16 Prescot Street, a grand mid-19th Century brick palazzo (both listed at Grade II).

- Architectural Significance

The whole frontage effectively acts as an advertisement for the products of Truman's Brewery. 'TRUMANS STOUT' 'MILD ALES' and 'PORTER' are advertised above the door and bay window with 'BURTON BREWED PALE & OLD ALES' above the first floor windows. The full name of the Brewery TRUMAN HANBURY & BUXTON is above the second floor windows with the name of the pub above the attic window.

The ground floor features a large canted bay with bright green tiles beneath the window. Green tiles are also used around all of the upper floor windows and to form the decorative details around the side and top of the dormer window.

The building is mentioned in Pevsner's East London - 'Squeezed in next to the Co-operative Bank, is the Princess of Prussia, a c.1880s public house. Neat and narrow with a projecting bay, coloured glazed dressings and tablet gable with broken scrolled pediment.'

- Social Significance

The pub is named after Victoria, the eldest child of Queen Victoria who married Prince Frederick of Prussia in 1858.



## THE SHAKESPEARE

**Ward:** St Peter's  
**Address:** 460 Bethnal Green Road, E2 0EA

The Shakespeare is a nineteenth century public house on Bethnal Green road featuring distinctive green glazed tiling and is one of the many Truman's public houses in the Borough.

The building is locally listed for its:

- Local Character and Distinctiveness

The distinct public house makes a significant contribution to the wider street scene.

- Architectural Significance

The building has a particularly distinctive facade. Decorative exterior tiles are a characteristic feature of many Victorian and earlier twentieth public houses but they are usually confined to the ground floor where they provided a durable, easy to clean surface. The green tiles, used here on the entire front facade, are laid like bricks, stretcher bond, on top of the earlier nineteenth century facade to give the building a more fashionable, more noticeable, appearance and help it compete with the many other public houses along Bethnal Green Road. The projecting single storey element includes finely detailed, fluted Ionic pilasters supporting decorative corbels and a well detailed cornice – all in green faience to match the tiles above. The tiles also cover the projecting west flank of the building. At fascia level, ceramic lettering advertises various alcoholic beverages – Stout, Mild Ale and Porter.

At the top of the building the name of the pub and the brewers 'Truman Hanbury Buxton & Co' are incorporated into the tile work.

The pub is mentioned in Pevsner's volume on East London.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



## THE SHIP

**Ward:** Island Gardens  
**Address:** 290 Westferry Road, E14 3AG

The Ship on Westferry Road is an interwar public house originally connected to buildings to the east.

The building is locally listed for its:

- Local Character and Distinctiveness

The Public House is a local landmark in the townscape and is reminiscent of the historic character of the surrounding area. The building is set forward of later development on the historic building line and was originally connected to other buildings on the left, hence the featureless rendered side elevation.

- Architectural Significance

The treatment of the exterior of this interwar public house looks back to earlier architectural styles. The building incorporates a mansard roof and tall chimney and rusticated pilasters to the upper floors. It is built of red brick.

The first floor and dormer window frames have all been changed. The ground floor facade has also been altered.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



## SIR SYDNEY SMITH

**Ward:** Whitechapel  
**Address:** 22 Dock Street, E1 8JP

The Sir Sydney Smith is a four storey 1930's public house, named after Sir Sydney Smith (1764 – 1840) who was an Admiral in the Royal Navy. The Public House was built for Truman's brewery.

The building is locally listed for its:

- Local Character and Distinctiveness

The Public House is a distinct feature in the townscape and a remnant of the historic character of the area. It is within the setting of the Wilton's Music Hall Conservation Area.

- Architectural Significance

The building is now located within a block of varying property types. There is an interesting, symmetrical arrangement of windows on the upper floors; the windows have Crittall type metal window frames typical of the interwar period. The first floor windows are taller than the second and third floors reflecting earlier domestic styles where the principal living room would be located at first floor level. The brick facade incorporates a parapet level faience Truman's tiled plaque and a second floor plaque inscribed 'Sir Sidney Smith' within which is incorporated the Truman's Eagle in gold.

The ground floor facade is largely unaltered but the distinctive green/blue and beige faience tiles have been painted. The fascia Level sign incorporates elegant lettering 'ALES TRUMAN'S STOUT'. The original ground floor windows and doors are remarkably unchanged including the leaded fanlights. The base includes small double doors for taking barrels down to the cellar.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



## SUN TAVERN

**Ward:** St Peter's  
**Address:** 441 Bethnal Green Road, E2 0AN

The Sun Tavern is a small public house located at the junction of Bethnal Green Road and Ellsworth Street.

The building is locally listed for its:

- Local Character and Distinctiveness

The corner public house makes a significant contribution to the wider streetscene.

- Architectural Significance

The scale of the building matches the c.1840's terrace to its left but the facade details of the pub appear to be from a slightly later period. The pub incorporates a cornice which visually sets it slightly apart from the terrace and the cill of the first floor windows are set at a slightly lower level. A roof extension has been added recently.

The ground floor of the public house projects as a single storey structure like those of the neighbouring shops, it incorporates a door on the curved corner. Interesting details survive on the ground floor facade including warm brown glazed brick tiles (incorporating narrow brick bands), fine timber window frames and decorative crobels at each end of the fascia band.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



## STAR OF BETHNAL GREEN (FORMER WHITE HART)

**Ward:** St Peter's  
**Address:** 359 Bethnal Green Road, E2 6LG

The Star of Bethnal Green is an imposing, three storey, corner public house, located at the junction of Bethnal Green Road and Rushmead and bares all the hallmarks of a classic Gin Palace.

The building is locally listed for its:

- Local Character and Distinctiveness

The Public House makes a positive contribution to local character and distinctiveness of the wider townscape and the building incorporates no. 357 and this is therefore included in the local listing.

- Architectural Significance

The building raises itself up above its surroundings. The floor to ceiling height of the ground floor is particularly generous. The exterior of the ground floor is divided by a series of decorative pilasters with elaborate capitals, the fascia is topped by a decorative cornice along which runs an intricate cast iron cresting, a rare survival. The large ground floor windows would originally have been filled by ground and bevelled glass and big gas lanterns would have hung out from the building over the pavement. The first and second floors are marked by rows of closely set sash windows with elaborate window head details, the details differing between the floors. Between the bold arches of the top floor windows are set a row decorative circular motifs.

Pevsner describes the Star of Bethnal Green as 'a typical C19th drinking palace with big arch windows to the top floor and panels of sunk rosettes.'

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.





## VICTORIA

**Ward:** Bow West

**Address:** 110 Grove Road, E3 5TH

The Victoria is a substantial corner building, dating from the interwar years but replaced an elaborate Victorian public house.

The building is locally listed for its:

- Local Character and Distinctiveness

The Victoria makes a positive contribution to the wider townscape and character.

- Architectural Significance

The building is mostly of three storeys with a small two storey element facing Arbery Road which incorporates a slender chimney stack which plays an important part in the overall composition of the facades. The building has an angled corner but unlike many Victorian corner pubs it did not have an entrance in this location, it made up for this with a remarkable six doors; four to Grove Road and two to Arbery Road.

The ground floor incorporates large areas of faience tiles now painted and a very large faience plaque is shown at high level on the angled corner in old photographs – this may well remain beneath the modern sign, the plaque incorporated the name of the pub with a decorative feature above.

Overall the facade had the a strong horizontal emphasis, fashionable in the 1930's, created by architectural details including the render/concrete bands running round the building above first and second floor level and the faience details at the base of the building; this was complimented by the horizontal glazing bars of the Crittal type windows at first and second floor level, the original windows have been replaced. At fascia level, tiles originally incorporated elegant lettering which read CHARRINGTONS over each pair of doors and ALE, WINES etc.

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



## WENTWORTH ARMS

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**Ward:** Mile End  
**Address:** 127 Eric Street, E3 4SR

The Wentworth Arms, on the corner of Eric Street and Wentworth Mews dates from the middle of the nineteenth century.

The building is locally listed for its:

- Local Character and Distinctiveness

The corner Public House is a distinctive remnant of the historic character of the surrounding area.

- Architectural Significance

The building has a two bay facade to Eric Street and a six bay facade to Wentworth Mews. It is of three storeys to the corner with a lower two storey section to Wentworth Mews and was once connected to a terrace of houses facing on to Wentworth Street. The curved corner above one of the four original entrances is used for signage – a traditional feature on many corner pubs. The building features decorative quoins, string courses and heavy decorative window surrounds. The upper floor features five 'blind windows' which are an original feature.

The exterior retains most of its original features with the exception of the projecting cornice which would have crowned the building. The bar windows would have originally contained cut and bevelled decorative glass but this has now gone as is the case in virtually all of the Borough's pubs.

Pevsner describes this pub as 'a decent Victorian stucco-trimmed corner pub'

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



# INTRODUCTION - OTHER BUILDINGS

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## Local List Nomination and Selection Process

The Council is consulting on additions to the Tower Hamlets Local List. The Local List document identifies buildings and structures that, whilst not statutorily listed for their national importance, are considered to be of local importance. Recognition in the Local List is a material consideration in the planning process when planning permission is required.

The following three buildings connected to a locally listed public house are also treated as new additions. These buildings form a single historic development with their adjacent public house, with both integral to the quality of the overall development.

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## 458 OLD FORD ROAD

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**Ward:** Bow East

**Address:** 458 Old Ford Road, E3 5JP

No. 458 was built along with the adjacent public house, the Eleanor Arms, and together they formed a single development.

The building is locally listed for its:

- Local Character and Distinctiveness
- Architectural Significance
- Social Significance

The upper floors of no.458 mirror the western bay of the interwar pub facade and the roof of the pub and no.458 are continuous.

The ground floor was originally faced with glazed tiles matching those of the pub and the windows of the upper floors also originally matched those of the pub. The current boarded shop fascia is a recent addition.

No. 458 was built as a shop with residential accommodation above, connected to the shop.



## 357 BETHNAL GREEN ROAD

---

**Ward:** St Peter's  
**Address:** 357 Bethnal Green Road, E2 6LG

No 357 Bethnal Green Road stands adjacent to the Star of Bethnal Green Public House (359 Bethnal Green Road) and forms part of the same historic development.

The building is locally listed for its:

- Local Character and Distinctiveness
- Architectural Significance
- Social Significance

The rich array of architectural features which are a key part of the character of the pub facade are continued across the facade of no. 357 including the ground floor pilasters, richly decorated ground floor shopfront cornice, string courses and window head treatments – very subtle differences are the omission of the decorative wreaths between the arched heads of the top floor and the omission of the incised decoration from the key stones of the top floor arches. The lovely ironwork cresting at shopfront fascia level is also omitted

The original timber sash windows of the upper floors of 357 have been replaced by uPVC. The shopfront and fascia sign are modern.



## 379 BETHNAL GREEN ROAD

---

**Ward:** St Peter's  
**Address:** 379 Bethnal Green Road, E2 0AN

No. 381 Bethnal Green Road forms part of the same historic development as the adjacent Old George Public House (No. 379 Bethnal Green Road).

The building is locally listed for its:

- Local Character and Distinctiveness
- Architectural Significance
- Social Significance

The brickwork of the facade of nos. 381 matches that of the pub. There are impressive tripartite windows on the first and second floor of the front facade, the details of which relate directly to the design of the narrower windows over the pub itself. The string course dividing the first and second floors and the prominent cornice and elegant roof top balustrade run across the pub and no. 381. The decorative quoins at the eastern end of the upper facade of no. 381 match those at the western end of the pub. The upper facade of no.381 is the grandest part of the overall combined facade.

The ground floor and fascia of the shop are recent.

Planning records (1959) indicate that no.381 granted permission for use as an office licence in connection with the pub. It is still an off licence.



## INTRODUCTION - OTHER BUILDINGS

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### Local List Nomination and Selection Process

Heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance so they can be enjoyed for their contribution to quality of life for current and future generations. The Local List document identifies buildings and structures that, whilst not statutorily listed, are considered to positively contribute to local character and distinctiveness. Recognition in the Local List is a material consideration in the planning process when planning permission is required.

Public nomination identified heritage assets across the borough to be considered for Locally Listing. In accordance with Historic England guidance, nominations are required to contribute to local character and distinctiveness in addition to two other selection criteria:

- Local Character and Distinctiveness
- Architectural significance.
- Historical significance.
- Artistic significance.
- Age, rarity and integrity.
- Social significance.

Local list nomination does not apply to historic assets that are statutorily listed or located within an existing conservation area. Conservation Areas afford a level of protection to unlisted buildings and, for this reason, priority will be given to nominated buildings that are not located within a conservation area.

The Castle Public House was nominated both through both public nomination and the review of public houses in the borough. Accordingly, it is recorded in this document twice.

## 66 ROYAL MINT STREET

---

**Ward:** St Katharine's and Wapping  
**Address:** 66 Royal Mint Street, E1 8LG

66 Royal Mint Street is an attractive warehouse building on the corner of Dock Street and Royal Mint Street.

The building is locally listed for its:

- Local Character and Distinctiveness

No. 66 Royal Mint Street makes a positive contribution to the local character and distinctiveness. It represents a fine example of a warehouse building, characteristic of the industry in the local area within close proximity of the docks.

The view south down Dock Street from under the railway bridge towards St Paul's Church, which includes no. 66 Royal Mint Street, is mentioned within the Conservation Area Character Appraisal and Management Guidelines for the Wiltons Music Hall Conservation Area (2009) as an important view. The appearance of no. 66 Royal Mint Street, therefore has an impact on the character and appearance of the neighbouring conservation area and on the wider local character. It is sited on a prominent corner location and represents a key stage in the historic development of this area.

- Architectural Significance

No. 66 Royal Mint Street is considered to be of architectural significance as a largely intact tobacco warehouse, dating from c.1891. The building retains many of its original features, including design, form and fenestration pattern, reinforcing its strong industrial warehouse character.

- Social Significance

No. 66 makes a positive contribution to the historical significance of the local area. Dock Street was laid out for access to the London Docks after 1806, but only became an important route after the opening of Commercial Road in 1843. No. 66 Royal Mint Street, built after this date, is an important historical remnant being a warehouse building, characteristic of the industry in the local area which was within close proximity of the docks.





## CHEVIOT HOUSE

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**Ward:** Whitechapel  
**Address:** Philpot Street, E1 2DS

Cheviot House is a rare survival of a 'rag-trade' modernist building.

The building is locally listed for its:

- Local Character and Distinctiveness

Cheviot House was designed by GG Winbourne and built in 1937 for woollen cloth merchants Kornberg and Seegal. The six upper floors were let as flatted factories (i.e separate factories within a multi-storey building), prior to the building being converted for local authority office use in 1951.

- Architectural Significance

The street facades create a roughly symmetrical Art Deco composition, bounded by stair towers at either side and a glazed corner tower. The ground and first floors are glazed curtain walls with tiling beneath cill level on the ground floor, and panels on the first floor. Above this, the elevations have strip metal framed windows and rendered bands which terminate in curved corners meeting the central glazed corner tower. The glazed corner tower has multiple lights with a flush transom between each storey. The stair and light towers each have a pair of full-height strips of glazing separated by a projecting fin with shallower projections on either side. The ground floor has been altered but retains a doorway with a faience architrave. Wave mouldings frame a window on the first floor, where the tiles and keystone have reeded mouldings. The Philpot Street entrance retains Cheviot House as faience signage.

An additional floor with outward sloping walls was added to the building in the 1990's. The building was recently converted to residential use with the additional storey re-faced in a more sympathetic manner.

- Social Significance

The East End was a notable centre of the rag-trade and Kronberg and Segal Ltd were the largest of the Commercial Road woollen merchants; and supplied woollen cloth from British mills to the men's and ladies' tailoring trades in the East End.



## EAST LONDON SYNAGOGUE

---

**Ward:** Whitechapel  
**Address:** 44 Nelson Street, E1 2DE

The East End Synagogue is the last remaining purpose built East End Synagogue which remains in use.

The building is locally listed for its:

- Local Character and Distinctiveness

The imposing red brick building is a significant feature in the wider street scene and an important reminder of the historic character of the area.

- Architectural Significance

The street facing elements of the building are of red brick except for a rendered projection at the east end. The facade to Nelson Street is composed of two tiers of arched windows located within arched recesses. The upper tier of windows, lighting the gallery, have semi-circular window heads with stone keystones and the lower tier have segmental window heads. There is a projecting bay at the west end of the facade in which is located the entrance. The slender cornice appears to be of concrete. The base of the building is of blue bricks.

The rather severe exterior contains a fine classical interior. Elegant Ionic columns support a gallery and rise up to a big cornice above which is a deep coved ceiling with semi-circular windows within it. The Ark is located within a recess reached by curved steps and framed by a Venetian arch on Doric columns. Above the Ark there is a scrolled pediment with tablets of the law and the Lions of Judah. The interiors also include a panelled Bimah and panelled pews.

- Social Significance

The foundation stone of the synagogue, designed by Lewis Solomon & Son was laid by B Bernstein (President) on 19th August, 1923. It is the last remaining purpose built, East End Synagogue which remains in use. Built as a Sephardic synagogue; many others Synagogues have merged with it over the years.



# THE CASTLE

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**Ward:** Whitechapel  
**Address:** 44 Commercial Road, E1 1LN

The Castle is a three storey mid nineteenth century public house on a triangular site at the junction of Commercial Road with Goodman’s Stile and Alie Street.

This building is locally listed for its:

- Local Character and Significance

The building is an important local landmark and a key feature in views towards the City.

- Architectural Significance

Original sash windows and decorative surrounds including distinctive curved prow marks survive on the upper floors. The ground retains many original features including fine pilasters with intricate capitals. The original cornice detail at the top of the building has been lost.

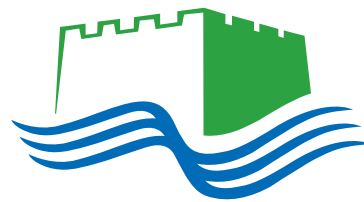
Pevsner mentions the building in his East London volume, describing it as ‘a stuccoed mid-C19 pub with rounded end.’

- Social Significance

Public Houses have been an important focus for community life and interaction for centuries.



**Tower Hamlets 2019**



**TOWER HAMLETS**

## APPENDIX TWO: LOCAL LIST NOMINATIONS

ADDRESS	COMMENTS	SHORTLIST?
16 Bacon Street	Located in the Brick Lane and Fournier Street Conservation Area	No.
Bethnal Green Gasholders No. 2 & No.5	Located in the Regents Canal Conservation Area	No.
113-115 Bethnal Green Road	Both are located in the Redchurch Street Conservation Area  113 is Grade II Listed	No.
130-134 Bethnal Green Road	Located within Redchurch Street Conservation Area	No.
125-127 Brick Lane	Located within Brick Lane and Fournier Street Conservation Area	No.
190-198 Brick Lane	Located within Brick Lane and Fournier Street Conservation Area	No.
46 Cheshire Street	Located within Brick Lane and Fournier Street Conservation Area	No.
Cheviot House, 227-233 Commercial Road	Not located within a Conservation Area	Yes.
3-5 Club Row	Located within Redchurch Street Conservation Area	No.
The Duke of Wellington Public House	Located within Wentworth Street Conservation Area	No.
East London Central Synagogue, 30-40 Nelson Street	Not located within a Conservation Area	Yes.
Lakeview Estate, Old Ford Road	Located within Victoria Park Conservation Area	No.
The Milestone located at The Castle Public House, 44 Commercial Road	Not located within a Conservation Area.	Yes.
4a & 6a Padbury Court	Located within Redchurch Street Conservation Area.	No.

Poplar Gasholder No.1, Leven Road	Building demolished.	No, but in due course, following re-erection of section of gasholder frame, it should be considered for local listing.
66 Royal Mint Street	Not located within a conservation area.	Yes.
70-74 Sclater Street	Located within Fournier and Brick Lane Conservation Area	No.
97-99 Sclater Street	Located within Fournier and Brick Lane Conservation Area	No.
Southern Grove Workhouse	Located within Tower Hamlets Cemetery Conservation Area	No.
St George's Swimming Pool	Located within St George in the East Conservation Area.	No.

### APPENDIX 3: SUMMARY OF CONSULTATION COMMENTS WITH LBTH RESPONSES

<b>GENERAL</b>			
<b>Representor</b>	<b>Summary of comments</b>	<b>LBTH response</b>	<b>Action</b>
Local resident	Support all proposed additions to the local list	Noted.	None.

<b>THE HUNGERFORD ARMS, 240 COMMERCIAL ROAD E1 2NB</b>			
<b>Representor</b>	<b>Summary of comments</b>	<b>LBTH response</b>	<b>Action</b>
Heritage Collective on behalf of the Wellington Pub Company	The building has undergone numerous alterations that have eroded its limited significance.	It is noted that the building has undergone some alteration. However, the changes that have been made are reversible and its essential character remains.	None.
	Whilst almost all public houses perform, to some extent, a social function and have the potential for past or present communal value, there is no particular social significance attached to this building.	Public houses provide a focus community and social interaction and they form part of the collective memory of the community. As such it is considered that this building does have social significance.	None.

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	Inclusion of this building would undermine and dilute the local list as a whole.	For the reasons above it is considered that the building would be a valuable addition to the local list.	None.
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<b>THE BANCROFT ARMS, 410 MILE END ROAD E1 4RQ</b>			
<b>Representor</b>	<b>Summary of comments</b>	<b>LBTH response</b>	<b>Action</b>
Heritage Collective on behalf of the Wellington Pub Company	The building is of a universal style that has no local historical reference. The lettering on the building does not present local interest in itself.	The building is locally distinctive and a local landmark as it stands out from the development around it being different in style and appearance. The lettering helps to give the building presence and identity.	None.
	The building has no particular architectural significance, and is of a type that is found across London. There is no evidence that the building is the work of an architect or craftsman of any notable ability or standing. Nor is there any aspect of the construction which is unusual.	It is recognised that this building is typical of many Truman public houses. However, it is still considered to be of architectural interest and retains many of its original features and hence its original character.	None.



	Whilst almost all public houses perform, to some extent, a social function and have the potential for past or present communal value, there is no particular social significance attached to this building.	Public houses provide a focus community and social interaction and they form part of the collective memory of the community. As such it is considered that this building does have social significance.	None.
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<b>THE CASTLE, COMMERCIAL ROAD E1 1NL</b>			
<b>Representor</b>	<b>Summary of comments</b>	<b>LBTH response</b>	<b>Action</b>
Heritage Collective on behalf of the Wellington Pub Company	The building contributes to the character and appearance of the local area, forming an important component in views west along Commercial Road.	Noted.	None.
	The external appearance of the public house forms the principal interest of the building and is relatively intact.	The external appearance is of interest, but the building also has social significance and the use contributes to its character.	None.
	While it meets the criteria for local character and distinctiveness it is not of particular age or rarity, nor does	Noted.	None.

	it have specific artistic interest.		
	The building has local architectural, historic and social interest. The assessment that the building 'is an important local landmark and a key feature in views towards the City' is supported.	Noted.	None.

<b>THE STAR OF BETHNAL GREEN, 359 BETHNAL GREEN ROAD E2 6LG</b>			
<b>Representor</b>	<b>Summary of comments</b>	<b>LBTH response</b>	<b>Action</b>
Heritage Collective on behalf of the Wellington Pub Company	The building contributes to the character and appearance of the local area, forming an important component in views along Bethnal Green Road.	Noted.	None.
	The external appearance of the public house forms the principal interest of the building and is relatively intact.	The external appearance is of interest, but the building also has social significance and the use contributes to its character.	None.
	The setting of the pub has changed dramatically over time.	Noted. The changed in setting increases the significance and	None.

		distinctiveness of the building.	
	The building is not of particular age or rarity, nor does it have any specific artistic interest.	Noted.	None.


<b>THE SIR SYDNEY SMITH, 22 DOCK STREET E1 8JP</b>			
<b>Representor</b>	<b>Summary of comments</b>	<b>LBTH response</b>	<b>Action</b>
Heritage Collective on behalf of the Wellington Pub Company	The building is of a universal style that has no local historical reference. The lettering on the building does not present local interest in itself.	The building is locally distinctive and a local landmark as it stands out from the development around it being different in style and appearance. The lettering helps to give the building presence and identity.	None.
	The building has no particular architectural significance, and is of a type that is found across London. There is no evidence that the building is the work of an architect or craftsman of any notable ability or standing. Nor is there any aspect of the construction which is unusual.	It is recognised that this building is typical of many Truman public houses. However, it is still considered to be of architectural interest and retains many of its original features and hence its original character.	None.

	Whilst almost all public houses perform, to some extent, a social function and have the potential for past or present communal value, there is no particular social significance attached to this building.	Public houses provide a focus community and social interaction and they form part of the collective memory of the community. As such it is considered that this building does have social significance.	None.
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<b>THE HOPE AND ANCHOR, 14 NEWBY PLACE E14 0ES</b>			
<b>Representor</b>	<b>Summary of comments</b>	<b>LBTH response</b>	<b>Action</b>
Heritage Collective on behalf of the Wellington Pub Company	The building does not form an attractive component of the townscape and is at best a neutral part of the character and appearance of the area.	Although the building has been altered, the fact that much of the development in the area from this time has been lost means that the building is local distinctive.	None.
	Whilst almost all public houses perform, to some extent, a social function and have the potential for past or present communal value, there is no particular social significance attached to this building.	Public houses provide a focus community and social interaction and they form part of the collective memory of the community. As such it is considered that this building does have social significance.	None.

	Inclusion of this building would undermine and dilute the local list as a whole.	For the reasons above it is considered that the building would be a valuable addition to the local list.	None.
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<p><b>Cabinet</b></p> <p>31<sup>st</sup> July 2019</p>	 <p><b>TOWER HAMLETS</b></p>
<p><b>Report of:</b> Ann Sutcliffe, Corporate Director, Place</p>	<p><b>Classification:</b> Unrestricted</p>
<p><b>Revised Property Lettings and Disposals Procedures</b></p>	

<b>Lead Member</b>	<b>The Mayor, John Biggs</b>
<b>Originating Officer(s)</b>	Alan McCarthy/David Beament
<b>Wards affected</b>	All Wards
<b>Key Decision?</b>	Yes
<b>Forward Plan Notice Published</b>	21 June 2019
<b>Reason for Key Decision</b>	Significant in terms of its effects on communities living or working in an area comprising two or more wards or electoral divisions in the area of the relevant local authority.
<b>Strategic Plan Priority / Outcome</b>	<ol style="list-style-type: none"> <li>1. People are aspirational, independent and have equal access to opportunities;</li> <li>2. A borough that our residents are proud of and love to live in;</li> <li>3. A dynamic outcomes-based Council using digital innovation and partnership working to respond to the changing needs of our borough.</li> </ol>

## Executive Summary

A revision has taken place to the abovementioned internal procedure which is used to provide additional guidance to the Council's Asset Management Team to reflect the greater use of digital communications, roles of agents in lettings and disposals, to maintain best practice and to take on board suggestions from the council's Audit team. This was deemed necessary following an earlier internal audit requirement.

The Mayor and Cabinet member are asked to approve the revised procedure.

## **Recommendations:**

The Mayor in Cabinet is recommended to:

1. Approve the attached revised procedure, and delegate to the Corporate Director of Place the authority to agree any subsequent amendments of a minor nature.

### **1. REASONS FOR THE DECISIONS**

- 1.1 The original 2015 procedure which has been used to provide guidance to relevant officers within the Council's Asset Management Team, needed updating to comply with current professional and commercial practice and the latest internal audit requirements to improve consistency and clarity, to ensure improved service delivery.

### **2. ALTERNATIVE OPTIONS**

- 2.1 To keep the existing procedures :-

These procedures were drafted some 4 years ago and do not include the improvements made in both new technology and professional practice in the interim. If they continue to be used, this could limit future improvements in performance and service delivery.

- 2.2 Not to have procedures at all

This may result in a lack of consistency in undertaking non-residential letting and disposals transactions and could result in deterioration of service delivery to the detriment of local businesses and residents.

### **3. DETAILS OF THE REPORT**

- 3.1 The lettings procedure relates to the Council's leased non-residential properties that are held mainly for investment purposes, plus community buildings that are also let or are to be leased. The disposals procedure applies to any council owned land and/or buildings that might be declared surplus to its requirements. These procedures were originally drafted in 2015 to provide guidance to officers within the Asset management Team to ensure that such transactions were carried out equitably, consistently and in accordance with good professional practice.
- 3.2 The 2015 procedure, has now been revised in order to maintain efficiency, to follow current good professional practice and improve service delivery. Consultation has taken place with the Council's Third Sector Team in connection with the letting of community buildings, and also . officers from the Council's Legal, Procurement and Audit teams have also been consulted.



- 3.3 The Letting procedure relates to properties within the Council's commercial investment portfolio when they become available for leasing on the open market.
- 3.4 The procedure also relates to community buildings owned by the Council should they also become available for leasing. This is generally carried out using private treaty methodology, employing external letting agents.
- 3.5 The Disposals procedure relates mainly to the various marketing processes available following decisions taken to declare Council owned property and/or land surplus to requirements, again using external agents.
- 3.6 It aims to maintain confidentiality and ensure that transactions are completed fairly in order to obtain best consideration.
- 3.7 The procedures have been drafted to ensure that each transaction is carried out professionally and that a clear process is followed by the Council's Asset management officers and appointed external agents in order to preserve confidentiality and improve service delivery so that best consideration can be achieved in every case.
- 3.8 Officers are now required to report to Cabinet on this as it is outside the scope of officer delegation and represents a significant Council policy,
- 3.9 It should be appreciated that the procedure is a working document, likely to be amended to keep in line with best practice, so delegated authority is sought for the Director of Place to approve any subsequent amendments required of a non-strategic nature..

#### **4. EQUALITIES IMPLICATIONS**

- 4.1 The revised procedure through increased efficiency and performance, should improve service delivery for all participating Borough businesses, and result in improved consistency and increased transparency by the Council in its property dealings. Through continued adherence to the statutory best consideration principles, officers will be able to ensure that Council commercial property and land portfolio is put to the best possible use for the benefit of all its residents.
- 4.2 It is considered that an equalities impact analysis is not required and the procedures will ensure equal access to Council real property opportunities for all sectors.

#### **5. OTHER STATUTORY IMPLICATIONS**

- 5.1 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are

required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:

- Best Value Implications,
- Consultations,
- Environmental (including air quality),
- Risk Management,
- Crime Reduction,
- Safeguarding.

5.2 The Council is required to obtain best consideration in all its property dealings under section 123 of the 1972 Local Government Act and the attached procedures emphasise the need for this statutory obligation to be met by all officers within the Asset Management Team through enhanced performance..

5.3 To comply with the statutory obligation to obtain best consideration, it does not necessarily mean acceptance of the highest offer received, but includes the ability by bidders to deliver, and also to comply with any non-monetary objectives specified in the marketing particulars.

5.4 In certain circumstances, the Council is able to enter into transactions below market value, and this is covered in more detail in paragraph 4.3 of the procedures.

## **6. COMMENTS OF THE CHIEF FINANCE OFFICER**

6.1 There are no financial implications emanating from this report that sets out the revised procedures for property lettings and disposals.

6.2 Any future activities and events resulting from the development of these procedures will need to be funded from within the existing resources of the service, or if required, through growth gained as part of the council's Medium Term Financial Strategy process.

## **7. COMMENTS OF LEGAL SERVICES**

7.1 The Council is obliged under section 3 of the Local Government Act 1999 to "make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness". This proposal has both financial and potential environmental benefits to the Council.

7.2 A revision has taken place to the internal procedure which is used to provide additional guidance to the Council's Asset Management Team to reflect the greater use of digital communications, roles of agents in lettings and disposals, to maintain best practice and to take on board suggestions from the council's audit team. This was deemed necessary following an earlier internal audit requirement.

- 7.3 The attached revised procedure fulfils the obligation referred to in paragraph 7.1 herein
- 7.4 When exercising its functions the Council has a duty under section 149 of the Equality Act 2010 to have due regard to the need to eliminate unlawful discrimination and advance equality of opportunity and foster good relations between those who share a protected characteristic and those who do not.
- 

### **Linked Reports, Appendices and Background Documents**

#### **Linked Report-NONE**

- None.

#### **Appendices**

Appendix 1-Revised Lettings and Disposals Procedure

#### **Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012**

- None

**Officer contact details for documents: N/A**

Or state N/A

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**Property Procedures  
for Disposals and Lettings  
2019**

## **Contents**

**1.0 Introduction**

**2.0 Workflow Diagrams**

**3.0 Procedures for Lettings**

**4.0 Procedure for Disposals**

**5.0 Authority**

**6.0 Definitions**

## **1.0 Introduction**

### **1.1 Purpose**

The purpose of these procedures is to ensure that a standard approach is understood and adopted by Asset Management officers to the disposal and letting of its property holdings.

The procedures apply to all Asset Management officers responsible for implementing the Council's disposals programme and for letting vacant properties. They describe the steps to be taken to declare a property surplus and, subsequently, for its disposal. They also outline the steps to be undertaken when marketing the Council's commercial and community properties using both internal marketing and external agents.

The key steps are described through workflow diagrams which identify milestones to support Asset Management officers in managing the processes.

### **1.2 Scope**

The Council and all employees and agents are to comply with the Council's Standing Orders, which comprise:

- a. These Property Procedures
- b. The Scheme of Delegations
- c. Financial Regulations
- d. Code of Practice on Local Authority Accounting.
- e. Formal guidance issued by Finance
- f. UK and EU law

In these procedures:

- "Property" shall mean any land or buildings owned by the Council or in which it has a legal interest.
- "Disposal" shall mean the sale of the freehold or the grant of a lease in excess of 25 years.
- "Letting" shall mean the grant of a lease for up to 25 years.
- These procedures will not describe the process for acquisitions.
- These procedures will not describe the process for instructing external agents.
- These procedures will not describe the process for granting way-leaves and easements.
- Land, buildings and property in the ownership of the Housing Revenue Account are included but Right to Buy sales are excluded.

All property is "owned" corporately by the Council in accordance with the "Corporate Landlord Model". Any Service occupying property does so in accordance with an Asset Plan prepared jointly by the occupying Service and Asset Management.

These procedures replace all previous procedures and policies.

### 1.3 Roles

The table below describes the roles and the functions of the officers involved in the letting and disposal process.

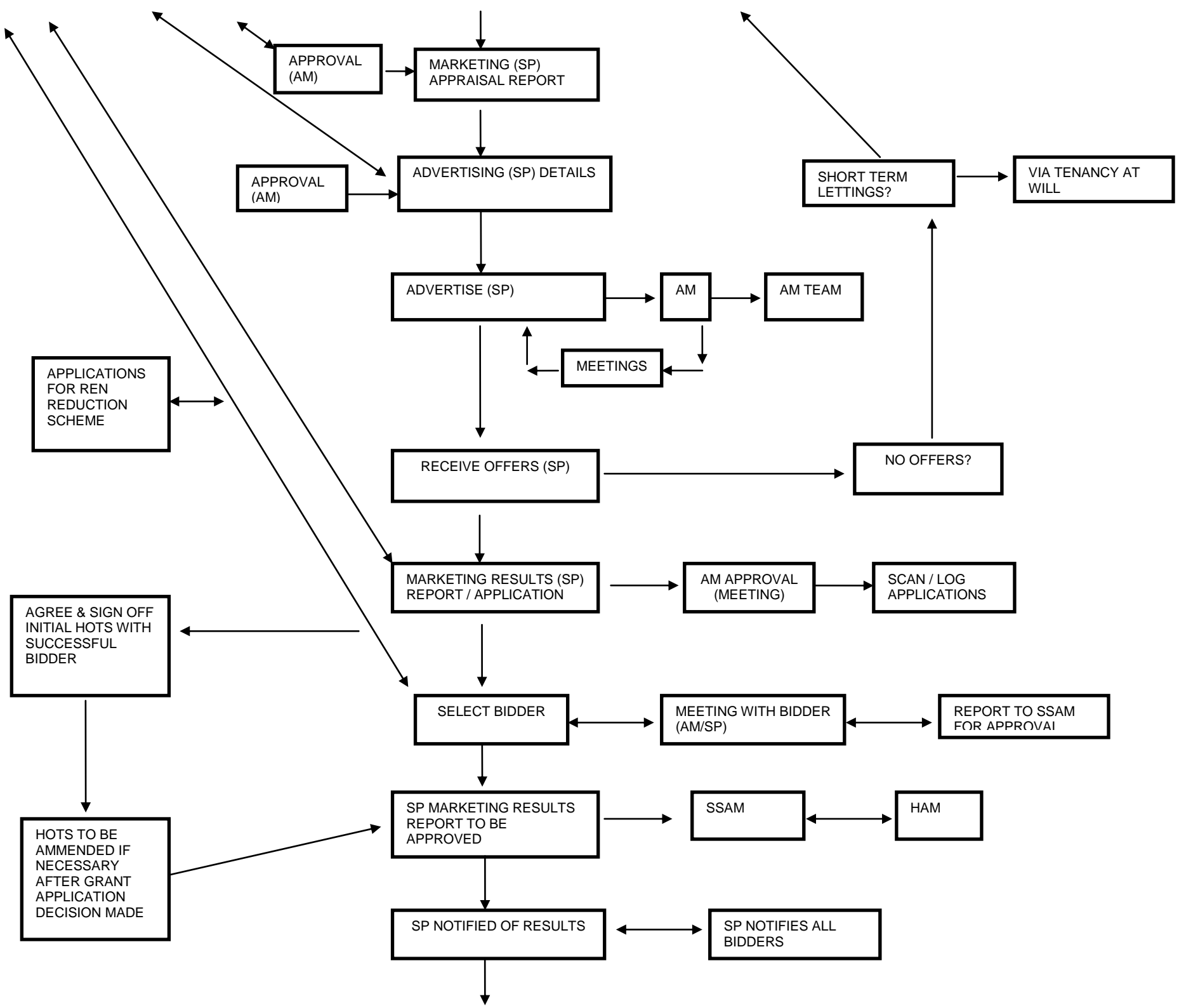
<b>Role</b>	<b>Function</b>
Head of Asset Management (HAM)	Responsible for providing overall direction, DD of Place and deciding on method of disposal and basis of tenure to be offered. The HAM has the ultimate responsibility and accountability to ensure that the Council's surplus commercial properties are let or disposed of in a timely manner.
Senior Strategic Asset Manager (SSAM) And Asset Manager (AM)	Responsible for declaring the property surplus and instructing external agents to market the property. The SSAM ensures that the marketing is completed in accordance with these procedures and has overall responsibility for the day to day management of the disposal.
Property Support Officer (PSO)	Responsible for certain tasks associated with marketing the council's commercial and community properties for letting. The PSO will act under the supervision of the SSAM or the AM.
Business Support (BS) Team	Responsible for administrative tasks as instructed by the SSAM or the AM, and updating the relevant Asset Management service's database.

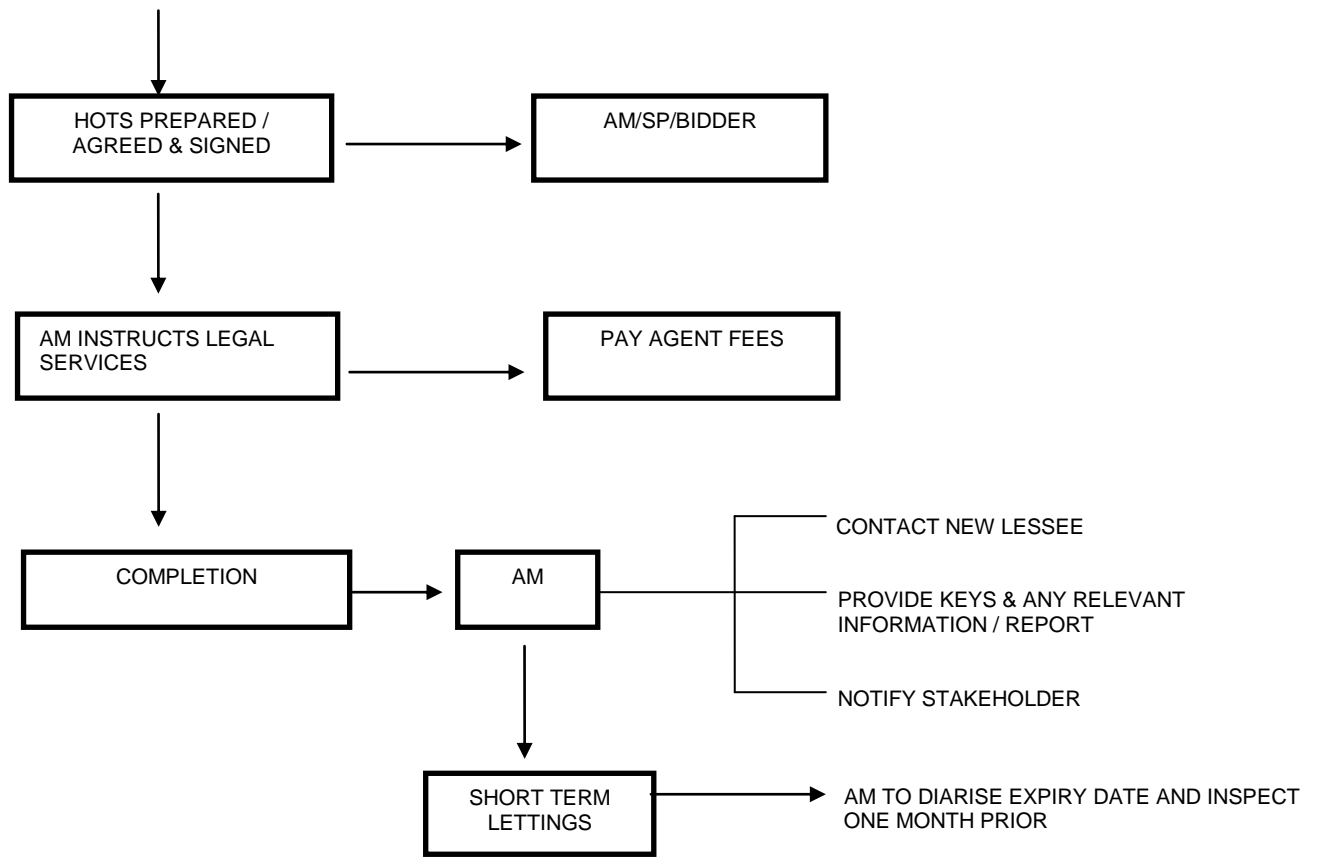


**2.0 Workflow Diagrams-**

**2.1 Lettings**







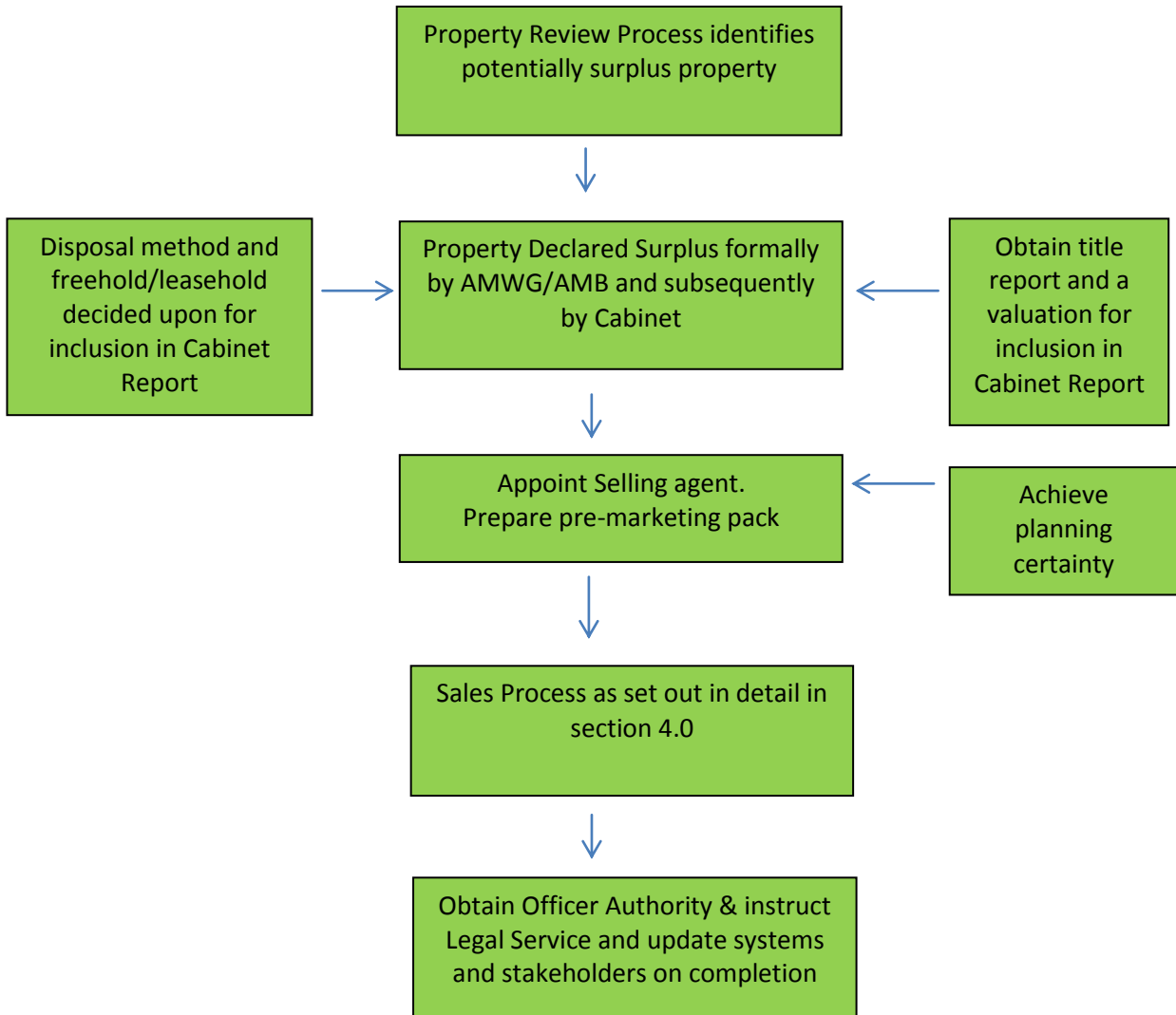
**KEYS:-**

- HAM – Head of Asset Management
- SSAM – Senior Strategic Asset Manager
- AM – Asset Manager
- PSO – Property service Officer
- AMDO – Asset Management Database Officer
- SP – Service Provider / Agent

**STAKEHOLDERS:-**

- Business Rate Section
- Property Insurance Section
- Facilities Management
- Empty Properties Officer
- Utilities –Gas, Electricity, Water
- Third Sector Team

## 2.2 Disposals



### **3.0 Procedures for Lettings**

#### **3.1 Introduction**

These procedures will apply to all commercial properties that are held by the Council. Properties will only be marketed when properties have been either considered as part of the asset review process and declared surplus to the Council's requirement, or already form part of the Council's commercial portfolio and continue to be retained for investment purposes.

It is mandatory that this letting procedure is followed on all commercial lettings except for the following exceptions:

- 1 Where it is necessary to obtain an Executive Decision in accordance with the policy and procedure where a letting may be recommended to a special party that can be defined as an organisation that is providing an essential service for residents that would otherwise need to be provided by the Council, but more cost effectively and efficiently.
- 2 On properties where leases are being granted to service providers to provide commissioned services and it is a condition of the awarded contract that a lease will be granted on the subject property to enable the service provider to provide the commissioned service.

#### **3.2 Identification of Surplus Property**

##### **Step 1**

A property will be identified as being surplus to the Council's requirements through the asset review process in which it has been identified by Asset Management and the occupying Service as being unused, under used or not offering value for money. For example, as a result of individual property review, the costs of maintenance may be prohibitive such that it is no longer cost effective to retain them. The property must also not be required for use by any alternative Council service area.

Any decision confirming a property as surplus to operational requirements will need to be cleared by the Asset Management and Capital Delivery Working Group (AMCDWG) and by the Asset Management Capital Delivery Board (AMCDB).

After clearance by AMCDB but prior to a decision by Cabinet, appropriate Cabinet members and Directors will be consulted on the proposal and their comments, if any, included in the Cabinet report.

##### **Step 2**

Once a Council-owned commercial investment or community property becomes available, the SSAM will create a marketing folder in the Asset Management electronic filing structure and notify the Business Support Team who will update the Technology Forge database.

### 3.3 Property Inspection

#### Step 1

The AM will arrange for a PSOI to inspect the property to ensure it is secure in order to prevent the risks of:

- Squatters and unauthorised entry (consider lock changes and installing security locks) If intruder alarm systems are in place, ensure proper operation.
- Fire hazards (remove any flammable material and close up any letter boxes )
- Flooding risks (by turning off the main water pipe and draining down the water systems)
- Gas explosions (turning off stopcock/isolating gas appliances)

The inspection should include:

- Completion of the empty property inspection sheet
- An Inventory if necessary
- Meter readings
- Photographs-internal and external

#### Step 2

The inspection findings will be discussed with the SSAM.

The following actions are required to be completed:

- Advise utility companies, to include meter readings taken and any forwarding address for previous occupiers.
- Decide whether electricity is still required to be left on e.g. electric shutters, access for viewing arrangements, contractors etc.
- Arrange any necessary clearance
- Consider any works required to secure a letting
- Advise the Insurance Section that the property is vacant
- Notify the Business Rates department that the property is vacant
- Notify the rental collection department that the property is vacant
- Consider whether a schedule of condition is required
- Obtain an Energy Performance Certificate (EPC).
- Consider presence of asbestos-is there any existing asbestos survey/management plan?
- Consider need for any property owners statutory compliance works/testing e.g. water purity, testing, electrical testing, boiler servicing.
- Ensure property is added to the Empty Property Inspection Schedule
- Consider need for lock changes if not already done.

NB: In deciding whether to discontinue a utility service it is relevant to consider the likely period before re-letting, the cost of re-connection and the amount of natural light available to undertake a viewing without electricity. Also any electrically powered security systems in place such as intruder alarms and shutters.

### 3.4 Property Marketed by External Agent

Before instructing an external agent, the AM should prepare a Marketing Strategy Report which should be submitted to the SSAM for approval. The AM should consult with the Council's Regeneration Team in the preparation of this report to take into account any redevelopment considerations pertinent to the case. The report should include such matters as type of use, (especially where a shopping parade is considered), suggested lease terms and any special considerations relating to individual properties, such as restrictions on type of retail use, intruder alarm codes etc. It should also cover details of any expenditure required prior to marketing to include essential repairs and maintenance. Once approved, a copy of this can be made available to the external agent prior to obtaining a market rental valuation.

#### Step 1

The council has made a decision to use external firms to market all vacant properties on their behalf rather than marketing properties internally.

The Council has entered into a contract with certain service providers to provide a range of estate management functions which includes the marketing of vacant properties. This activity is undertaken within a property consultancy framework with agreed fees.

It is the responsibility for the Asset Manager to select a service provider based on experience and specialist knowledge, prior performance and fee quote for undertaking a marketing appraisal and then for marketing the subject property.

#### Step 2

The service provider will first be instructed to provide a Rental Determination Report (market appraisal) within two weeks (10 working days) of instructions. The standard agreed template should be used for this purpose and should include the following:

- **Instruction summary and approved marketing strategy report**
- **Premises description**
- **Accommodation**
- **Market evidence (A minimum of three relevant comparables to be provided)**
- **Recommended quoting rental**
- **Recommended Market Rental (MV)**



**A standard report should be provided as part of the procedure.**

For all properties the following will be provided to the service provider:

- EPC certificate
- Planning use/planning consent plus required management use
- Floor plans
- Previous copy of the lease
- Approved marketing strategy report
- Keys for viewings
- Asbestos management plan, if appropriate

### Step 3

The service provider will be instructed to provide an end to end letting service on behalf of the Council. This will include the preparation of marketing documents, advertising (both through the Council website and other media outlets to be agreed) viewings, agreements of heads of terms and preparation of land registry compliant lease plans.

The service provider will also be required to test business viability and complete credit checks in line with the Council policy and procedure, and data protection laws.

In order that the process is fully transparent and that the Council maintains mixed parades that support communities, the service provider will carry out marketing and letting in line with the Council's shop policy, marketing strategy report and this procedure for Disposal and Letting.

For the avoidance of doubt, any advertising (other than through the Council's or the service providers website) requested by the Council will be charged to the Council at cost price e.g. advertising boards, advertisements in the press media.

The service provider will advise the Council of interest and bids of relevance for review as part of their recommendation to proceed with a new letting in accordance with Step 8 below.

#### Step 4

The service provider will prepare marketing details for approval by the Asset Manager. These should follow a standard format and include the following details (this is not an exhaustive list)

- **Photographs**
- **The address including the full postcode**
- **Location plan of the property**
- **A brief description of the property and the area**
- **A breakdown of the accommodation.**
- **Quoting rental**
- **Length of lease being offered including the standard form of lease, and particular specified use if appropriate e.g. butcher shop.**
- **A floor plan to scale**
- **Block viewing dates and contact details.**
- **Deadline for applications and name and address of contract at service provider to whom applications should be sent to.**
- **The Council's logo should also appear on the details.**
- **Permitted planning use/planning consent.**

**Standard letting details template should be attached to the procedures.**

#### Step 5

The Asset Manager will approve the letting details. The Service provider will arrange for their publication.

The minimum publicity should include the following:

- The service providers web page
- The Councils website
- The Docklands and East London Advertiser
- To place a "To Let" board on the property.
- Other websites or other media outlets to be agreed between the Asset Manager and the service provider on instructions.

The property will be marketed for no less than 4 weeks and for a maximum a period, to be agreed between the Asset Manager and the service provider. Over this period, the selected agency will be given sole letting rights

Interested parties are only to view the premises by prior arrangement with the service provider not the Council. The service provider will be required to keep a record of the parties who have viewed the property.

The service provider will be required to update the Asset Manager on the level of interest and progress on a regular basis, the frequency to be agreed at the time of instruction.

#### Step 6

The Asset Manager will notify the whole of the Asset Management Team of the publication details to ensure that they know to direct any interested parties to the service provider.

#### Step 7

All completed application forms (offers) and references will be received by the service provider and will only be provided to the Asset Management Team at the end of the process.

The scanned forms and references will be saved by the Asset Manager in the relevant property folder.

#### Step 8

The Service provider will be required to prepare a Marketing Results report summarising all offers received, bids of relevance for review and recommendations for acceptance or rejection of any offers.

The service provider will take the factors below into account when considering all the offers and making a recommendation to the Council.

- Rental value offered
- Suitability of use proposed
- Ability to pay
- Due diligence to include covenant strength, references and credit reports
- Lease term requested/offered
- Business experience
- Business plan
- Cash flow forecast
- Benefit to the parade (if a shop) and community generally

The service provider needs to confirm that the rental reflects best consideration reasonably obtainable and complies with the Local Government Act 1972 section 123. It should be noted that best consideration does not oblige the Council to accept the highest offer. The status of the prospective lessees must be considered in terms of their ability to service the rent and any other payments due and the suitability of their business to the location under consideration.

It is noted that there is a general presumption against A3 and A5 uses, however uses will be considered in the context of the viability of the parade and the existing level of provision locally.

### **Declaration of interest (conflicts of interest)**

The authority requires bidders to identify any actual, potential or perceived conflict of interest in relation to the authority and its organisation (limited to person dealing with the negotiation and/or acquisition of the site in question.) The concept of a conflict of interest includes any situation where relevant staff members and elected officials have directly or indirectly, a financial, economic or other personal interest which might be perceived to compromise their impartiality and independence in the context of the disposal process.

Where there is any indication that a conflict of interest exists, may arise or be perceived then it is the responsibility of the bidder to inform the authority detailing any conflict.

Included within the bid application form sent to all bidders will be the following question:

“Please confirm whether there are any actual, potential or perceived conflicts of interest in relation to the authority and your organisation (limited to persons dealing with the negotiations and/or acquisition of the site in question).

Yes/No

If yes please detail the conflict of interest below: “

The service provider will be required to submit their report within two working days of the expiry of the deadline for receipt of applications.

### **Step 9**

The Asset Manager will arrange a meeting with the service provider to discuss and review the service provider report and recommendations within a week of the closing date for offers, if necessary.

Prior to that meeting, the AM will check with officers within the Council’s Income Section to ascertain if any of the candidates are previously known to the Council and have a past poor payment history.

At this meeting, all applications received will be reviewed together with any business plans and cash flows.

Due to the relatively low rental income for the majority of Council owned shops, it is not practical to seek expert advice on the quality of a cash flow or business plan and it is accepted that the Asset Manager and service provider will take a common sense approach when assessing these criteria. Where expert advice is required, the Council’s Finance Business Partner should be consulted.

Following initial selection, the AM should then meet briefly with the selected candidate to further ensure suitability before proceeding to Step 10. AM should arrange for all meetings to be minuted and filed.

### **Step 10**

Following the preparation of a summary report (to include the offers that have been made together with the service provider's recommendations, with a requirement for the HAM to authorise the same), the Asset Manager will discuss the service provider's recommendations with the Head of Asset Management and obtain signed approval to proceed with the letting.

#### Step 11

The Asset Manager will obtain the appropriate necessary approval for the proposed letting via a Cabinet Report or by obtaining authorisation from the Director under delegated powers, using the Officer Authority (OA) /Directorate Decision form for the proposed letting.

Once this is obtained the Asset Manager will advise the service provider so that the successful bidder can be advised and also to inform those that were unsuccessful. The service provider/agent will then be instructed to prepare heads of terms to be agreed with the AM and then signed off by the successful bidder via the service provider/agent. The AM will then instruct Legal Services to prepare the draft lease and copy the Business Support Team who will populate the Legal Instruction schedule for monitoring purposes.

Completion should normally be within 28 days of confirming instructions, unless otherwise stated.

#### Step 12

It is usual for the Council to require a 6 month rent deposit from the lessee at the time of completion together with the first quarter's rent in advance, and it may also be necessary to obtain a guarantor in some circumstances. Rent deposits should be held in a separate interest bearing account and returned to the lessee with interest on final vacation of the property (unless otherwise agreed), on the proviso that there are no arrears or other breaches of covenant that will result in a financial loss to the Council.

AM should consult with the Chief Finance Officer and internal processes for rent deposit collection, recording, refund and reconciliation put in place.

Following agreement on the above with the lessee, the Council's solicitor should be then instructed by the AM to prepare the necessary legal documents.

Once the Lease and Deposit Deeds (and any guarantor agreements) are completed the Asset Manager will be responsible for ensuring that the following is handed over to the tenant:

- Compliance certificates
- Asbestos report
- EPC
- Keys
- Meter readings for utilities

In the event that the letting is aborted, consideration should be given to either selecting another suitable candidate from the initial marketing exercise or re-marketing the property.

## Step 13

The Asset Manager will notify all stakeholders of the completion of the new lease.

**Finance** – so it is known to charge rent, frequency and service charges.

### **Business Rates Section**

**Insurance Section** – So they know to charge the tenant to reimburse the Council for the building insurance.

**Empty Properties Inspection list**-delete relevant property address

**Asset Management Database Officer** – to update the details of the new letting on TF cloud. Also to upload the completed lease and Deposit Deed onto TF Cloud.

**Utility companies**-gas water and electricity

**Facilities Management** - if appropriate.

**Voluntary Sector Team** – if appropriate

### 3.5 Short term/Seasonal lettings

- (i) Following completion of steps 1-6 above, in the event that after a reasonable period of market exposure (say 2-3 months), there has been little or no positive interest or acceptable offers received, the AM should consider short term or seasonal lettings (the latter dependent on the time of year). E.g. around celebratory times or holidays e.g. Christmas, Easter or other suitable ethnic events likely to generate property demand for a limited period.
- (ii) The AM should liaise with the appointed agent to consider re-offering the property on a short term basis (up to 6 months is suggested). Fees may have to be renegotiated with the agent and possibly the market rent level (Consider using an all inclusive figure to cover business rates, utilities and buildings insurance), plus further approval to marketing details. Steps 3-6 above should be reviewed and followed as appropriate to the case under consideration.
- (iii) Following re-marketing and receipt of offers, steps 7-13 should also be reviewed and followed as appropriate to the case. It is unlikely that a full 6 month rent deposit or guarantor will be required, although consideration should be given to taking the total amount of rent due in advance for the limited period of occupation.
- (iv) Diarise the tenancy termination date and inspect 1 month prior to arrange a timely vacation.

- (v) It should be appreciated that these types of occupiers usually require occupation quickly due to the immediate and time limited nature of their business so time taken to give possession will usually be critical if a successful letting is to be achieved.
- (vi) Consideration should be given to using a standard short term form of agreement, such as a tenancy at will in order to expedite the legal process. Immediate and effective liaison with the Council's solicitor will usually be crucial and it would be beneficial to obtaining delegated authority for Asset Management Team to utilise a standard tenancy at will document, the content agreed with the Council's solicitor and HAM to sign off such a document without further recourse to Legal Services.

### **3.6 Selecting a Tenant for a Community Building**

#### **General Background**

The Council's letting policy for community buildings has been set as follows:

Lease term: 3 to 5 years on full repairing and insuring terms

Rent: A community rent level of £14 psf will be used for D1 uses for existing occupiers for new lease agreements in accordance with the Statement of Policy and Procedures agreed by Cabinet in March 2018 and recognised as representative of market rent at the time of the Cabinet decision. For future new lettings, Market Rental Value will be determined following a marketing exercise or obtaining a current valuation from a suitably qualified and experienced professional to ensure that the Council continues to receive best consideration in accordance with its statutory obligations.

All vacant community properties that have been declared surplus will be marketed by service providers on the same basis as the Council's commercial portfolio, i.e. market rental value, but the focus will be on community output rather than the rental achieved.

Eligible applicants will be able to apply for grants under the Council's Community Benefit Rent Reduction Scheme (CBRRS)

All offers received for such properties within the Council's portfolio will be referred to LBTH Voluntary Sector Team for consideration to maintain due-diligence in terms of ensuring that organisations meet acceptable standards of governance, management and financial controls which are consistent with those applied to funding and other support from the Council to the Voluntary and Community Sector.

#### **Step 1**

Follow the processes and steps set out in paragraphs 3.1-3.3 above as appropriate.

#### **Step 2**

The AM will prepare a Marketing Strategy Report as per paragraph 3.4 above. It should contain the usual property detail as outlined in the aforementioned paragraph, but should also include details relating to the Council's Rent Reduction

Scheme and suggestions relating to the appointment of a suitably experienced service provider/agent.

The draft report should be passed to the Voluntary Sector Team for input, likely to include advice/assistance in relation to the Council's policy when leasing community buildings, the CBRRS and service provider appointment, and may include a "lettings pack" for potential bidders which will help to ensure transparency and that any bids received are relevant and meaningful.

The report should then be submitted to the SSAM for review and approval.

### **Step 3**

Next follows the appointment of a suitably experienced service provider/agent.

The Voluntary Sector Team should be involved in advising the agent to ensure VCS organisations are made aware of the opportunity. The Voluntary Sector Team in turn will use its network of marketing channels, including the VCS Premises Forum to promote the opportunity.

### **Step 4**

After appointment of the service provider/agent, Steps 2-4 in para. 3.4 above should be followed where appropriate and if possible, a standard letting details template should be prepared by the AM in liaison with the Voluntary Sector Team and approved by the SSAM.

### **Step 5**

Letting details are to be prepared by the service provider/agent and approved by the AM and Voluntary Sector Team. Then proceed as per para. 3.4, Step 5 through to Step 9.

At the meeting with the service provider/agent to select the successful bidder, both AM and Voluntary Sector Team should participate in the selection process and notes of the meeting taken and filed to include selection criteria..

### **Step 6**

Proceed then to steps 10 and 11 (para .3.4 above) to include agreeing and obtaining a signed copy of the initial heads of terms via the service provider/agent. The successful bidder, where applicable, may wish to make an application to the CBRRS via the Third Sector Team before the Council's Legal Services Team can be instructed to prepare a draft lease. It should be noted that this process could take circa. 3 months to complete and the outcome is not certain. This will delay completion beyond the stated usual 28 day period for commercial property leases.

### **Step 7**

Following the outcome of the CBRRS application, the AM will review the initially agreed heads of terms together with the Voluntary Sector Team, and amend as necessary before submitting to the service provider for final agreement with the successful bidder.

### **Step 8**



Proceed then with steps 12 and 13 (para 3.4 above), notifying all relevant stakeholders, including the Voluntary Sector Team, following lease completion.

#### **4.0 Procedure for Disposals**

##### **4.1 Key Steps**

###### **Step 1**

A property will be identified as being surplus to the Council's requirements through a process of ongoing property review in which it has been identified by Asset Management and the occupying Service as being unused, under used or not offering value for money (because, for example, as a result of individual property review, the costs of maintenance may be prohibitive such that it is no longer cost effective to retain them).

Alternatively a service reconfiguration exercise led by a service department may identify that a property could be released for disposal subject to decisions about the future delivery of the service and potentially the investment of the proceeds of disposal in the service.

The HAM will then consult other Service departments and relevant partners to establish whether the property could meet their current or future service needs.

The officer decision confirming a property as surplus to operational requirements will be taken by the Asset Management Board on the recommendation of the Asset Management Working Group.

After clearance by AMB, but prior to any decision by the Mayor in Cabinet, appropriate Cabinet Members and Directors will be consulted on the proposal and their comments, if any, included in the Cabinet report.

The Cabinet report will seek approval to dispose delegation for the Director, Place, in consultation with the Director, Governance, to accept an offer and to negotiate further if necessary and to enter into the legal documentation necessary to complete the disposal.

The Cabinet report will recommend whether the sale should be leasehold or freehold and will include an assessment of the value and other implications of the alternative approaches It will also advise on the timing of the disposal and when the property should be brought forward.

The Cabinet report will include the comments of the Director, Resources, for example, capital, revenue or VAT implications and also of the Corporate Director, Governance, which may include the effect of any covenants, restrictions, ACV listing or other legal implications and the implications of any statutory consents.

The principle of property disposals will be reported in the open part of the agenda to ensure transparency and openness for the public, whilst valuation and other commercially sensitive information will be included in an exempt appendix

Following approval of Cabinet the SSAM will create a marketing folder and update

the Technology Forge database.

There is delegated authority for the Director, Place to agree to the disposal of property at market value where the estimated value is up to £250,000. In the case of disposals at an undervalue the delegation applies where the value of the consideration and the undervalue foregone do not together exceed £250,000.

There is a caveat to the delegated authority where the property consists in whole or part of open space to which the advertising requirements of the 1972 Act apply.

In cases of delegated authority the steps above will be followed except that a report to the Director for decision, rather than to Cabinet

## Step 2 Deciding on the Method of Disposal

The methods of disposal that may be used are:

- (a) Informal tender
- (b) Formal tender
- (c) Auction
- (d) Sale by Negotiation

The Divisional Director in consultation with HAM,, will determine the most appropriate method of sale. This will be a matter of professional judgement based on the type and location of the property and the prevailing property market and will always be subject to the Council meeting its legal requirements. Where a disposal requires outputs such as social housing or community benefit it may be governed by Public Procurement Regulations as well as s land sale legislation.

The general presumption is that the method of sale should require the open invitation of competitive bids unless the Divisional Director and HAM considers that an alternative method of disposal would be more appropriate.

Sales by **Formal Tender** and **Auction** (see definitions) are largely regulated by the process that needs to be followed to achieve a legally binding contract and are not described in these procedures.

Sales by **Negotiation** are likely to involve a “special purchaser” (see definitions) and examples are:

- (i) Sale to a party with an existing interest in the property, often a leaseholder.
- (ii) Sale of an access right which would enable a purchaser to release development value locked up in other property.
- (iii) Sale to an adjoining owner or sale of a part-interest in a property where amalgamation of interests could enable “marriage value” to be realised.
- (iv) Sale to a public body (e.g. an RP) at less than market value where other benefits are offered to the Council, provided that such sale is within the terms of disposal at undervalue consents, or receives Secretary of State Consent and subject to European legislative requirements, relating to State Aid for example.

These examples are given on the basis that the Divisional Director and HAM

consider that negotiations with one party would produce a higher figure or, alternatively that non-financial considerations that fall within the Council's discretion justify a sale (see definition). In all such cases a valuation must be provided by external consultants.

The SSAM will obtain a title report from Legal Services to ascertain any issues that may have an effect on value or the method of sale.

Where a property is on the list of Assets of Community Value there is a prescribed process to follow whereby the Council will give notice of its intention to dispose and, depending on the response, may need to allow a moratorium period during which it will not be able to conclude a transaction except to a community interest organisation.

Where Crichel Down rules apply the Council must follow a procedure to trace a former owner and offer an opportunity to purchase.

### **Step 3 Tenure – Deciding whether to sell the Freehold or Leasehold**

Whether to sell freehold or a long leasehold needs to be considered on a case by case basis. However, the Council has a general policy to dispose of property via long leaseholds.

As part of the report to Cabinet or the Director recommending a property being declared surplus, the Divisional Director/HAM will recommend if the sale should be leasehold or freehold. This will include an assessment of the value and the impact on value, if any, of the respective tenures.

Examples of where a freehold sale may be considered appropriate are:

- (a) Where the level of capital receipt, over and above a leasehold disposal, exceeds the perceived benefit of a leasehold disposal (i.e. so that a leasehold disposal could not be reasonably justified).
- (b) For commercial transactions, where a developer or funder's reasonable requirements require a freehold transfer to facilitate a sale or regeneration, often where land for redevelopment is being assembled from different owners.
- (c) Where it is necessary to sell a freehold to release additional value from a transaction (e.g. marriage value through bringing sites into single ownership).

This list is not exhaustive and other circumstances could apply. Because of the potential effect on value the Council needs to ensure that each case is considered on its merits.

### **Step 4 Obtaining Planning Certainty**

Prior to sale, the Divisional Director/HAM will consider what level of certainty of planning is required to maximise value. Greater planning certainty may crystallise value and increase the Council's chances of achieving a quicker, unconditional sale. Planning certainty can be achieved through obtaining planning permission (outline or full) or alternatively, and to a lesser degree, by preparing a planning advice note or a Planning Brief/SPD.

At a site specific level, a planning advice note provides a valuable mechanism to establish clear principles for the future development of a site, to shape both the form and nature of uses.

A Planning Brief/SPD is more appropriate for large sites which may have been the subject of public consultation and its adoption as Council policy by the Cabinet provides a guide to a potential developer, officers and the appropriate Planning Committee, of the Council's expectations for the future use of the site.

No property with development potential will be marketed without a planning advice note as a minimum.

All marketing information relating to disposals (except those under statutory powers) will include the relevant planning advice note or Planning Brief/SPD.

It is acknowledged however that such planning documents cannot fetter the discretion of the development control process in determining a subsequent planning application. Officers will ensure that clear boundaries will be maintained to ensure that the Council exercising its disposal powers as landowner does not fetter its duties as Local Planning Authority.

#### **Step 5 Preparation of Pre-marketing Pack**

The SSAM will collate an information pack which will vary according to the type of property being sold but generally will include the following:

- A brochure including photographs, location and site plans, address including postcode,
- sale process and contact details
- Energy Performance Certificate (EPC)
- Asbestos reports if available
- Any specialist surveys that the site specifics require
- Services and utilities plans if available
- Planning information
- Title issues
- Occupations
- Boundary issues
- Contamination
- Any consents that may be required
- Tax issues

Essentially the information supplied will need to include the brochure/advertising details, sale process, contact details, title details plus any planning information/consents available.

#### **Step 6 The Sales Process for Sale by Informal Tender**

When a property is to be sold by informal tender the Council will ensure that the appointed agent openly markets the property locally and nationally on websites and/or printed media. It will also ensure that the highest levels of probity and confidentiality are maintained during the sales process. The appointed agent will be expected to enter into the Council's standard agency contract prepared by the

Council's solicitor which will include confidentiality and declarations of interest clauses.

The following process will be followed by the SSAM and the appointed agent to ensure the Council's interests are protected:

#### Marketing

- The property must be advertised in a national and a local newspaper (or specialist property publication), on the marketing agents website and social media platforms and also on the Council's Webpage
- A board must be erected on site
- The agent will market the property for a six to eight week period, conduct all viewings and maintain a log of those viewing
- All offers are to be submitted in a pro-forma prescribed by the agent and the SSAM, to include declarations of interest.
- Offers must be submitted by a fixed time and date
- Declarations of interest and controls should be defined in the agency contract with the service provider.

#### Receipt of Bids

- Bids must be returned to the Council's Divisional Director, Property & Major Programmes in a plain sealed envelope marked 'OFFER' identifying the property but not the identity of the bidder or to an e-portal set up for the purpose and operated by the Council's procurement team.
- The bids must not be opened prior to the specially convened bid opening meeting and will include any electronic or late bids authorised by HAM.
- The SSAM must inform Facilities Management and Business Support before the tender deadline that hard copy bids are due and must not be opened
- Facilities Management will give advance notice to the post room/reception and will ensure that they notify the SSAM and/or Business Support of bid arrivals immediately that they arrive
- Business Support will initial, date and time stamp the bid envelopes on receipt and issue each with a sequential receipt number to indicate the order in which offers have arrived
- All bids must be held in the safe of the Divisional Director, Property & Major Programmes' until opening
- The agent/service provider will be responsible for ensuring the confidentiality of all bids, including any received electronically

#### Bid Opening

- Bids should be opened by the Divisional Director/HAM in a specially convened meeting attended by the SSAM, a representative from the external agent's firm and a legal officer
- At the meeting, the Divisional Director/HAM must initial and time each offer and record it in a formal schedule
- Officers will record the following information in the schedule at the bid opening meeting:
  - the name of the bidder

- the level of offer
  - any conditions attached to the offer such as planning consent
- The schedule must be signed and dated by all present at the end of the bid opening meeting
  - The schedule will be then retained within an overall register (in the form of a book) maintained and kept in the safe of the Divisional Director
  - Equivalent processes will be followed where e-bids have been submitted.

### Bid Evaluation

- Following the bid opening meeting the SSAM will scan or save the bids to the secure drive of the Divisional Director/HAM
- No other soft copies of the bids will be held
- The SSAM will ensure that the hard copy bids are held in the safe of the Divisional Director during the period until contracts are exchanged after which they may be archived
- The SSAM will send the bids to the agent for full analysis and subsequent detailed reporting
- The agents will consider and record the following key information (which is not exhaustive):
  - the level of offer
  - the bidders' track record (previous experience, to include details of any similar successfully completed projects.)
  - any conditions attached to the offer
  - details of funding and to the extent possible, proof of funding (e.g. bank statements, certified copy accounts, approved applications for loans and grants.
  - the proposed use
  - any other relevant information
  - Decisions will not be made just on the basis of highest offer.
  - All bids to be treated as confidential by the agent in accordance with the agency contract with the service provider.
- The agents report will include, amongst other things, a clear recommendation on which bids to progress, whether to enter into a further bid stage and whether to interview any bidders for clarification purposes. This report is to be reviewed and authorised by HAM.
- Failure to meet any of the pre-conditions or processes required by the Council may invalidate an offer
- The agents will keep a written record of every discussion held with a bidder
- All bids to be treated as confidential, including electronic bids as per the agent's contract with the Council.

### General Requirements Relating to Bids

- Any negotiation for a land transaction above £250,000 should be reported

to the Divisional Director as they take place and a file note or other record of each discussion should be placed on the relevant file

- Pre-contract enquiries and a standard form of lease/transfer may be made available to bidders as part of the marketing process in order to expedite a sale but this is not a requirement
- Bidders will be required to exchange contracts within a prescribed number of days from the date of being provided with a contract. If exchange does not occur within the prescribed timescale, the offer may be deemed to be withdrawn and the Council may accept an offer from the second ranked bidder to be selected by the Asset Manager after consultation with the agent.
- Bidders must be informed that bids can be subject to scrutiny by Overview & Scrutiny Committee and therefore, they will need to identify information that they believe is commercially sensitive and note that after a time period it will no longer be deemed to be commercially sensitive and will also be subject to FoI requests.
- All meetings to be minuted by AM and filed.

#### **Step 7 Instructing Legal Services or External Solicitors**

The marketing agents under the direction of the SSAM will produce Heads of Terms and obtain an Officer Authority to instruct Legal Services or the appointed external solicitors as appropriate.

Once the sale process has completed Legal Services will issue a completion statement which will be sent to all internal stakeholders including:

- Finance Section
- Insurance Section
- Rates Section
- The client department
- The database manager

Any other relevant departments or parties Payments on completion

The SSAM will liaise with Legal Services to agree sums to be paid on completion and the correct allocation of sums within the Council's accounts.

## **4.2 Other Bids**

Any bid which, on the evidence available, is considered to be incomplete, insubstantial or in any other way defective, mischievous or frivolous may be rejected by the Divisional Director/HAM after consultation with the Director of Governance.

The Council's obligation to obtain best consideration must be considered when dealing with all property transactions.

### Emailed Bids

Agents must inform interested parties that e-mailed bids should not be submitted and that the hard copy or e-bidding routes via the Council's electronic portal should be pursued.

However, recognising that in practice some bidders will fail to adhere to this stipulation and such emailed bids, if received, may be considered on a case by case basis and at the discretion of the Director in consultation with HAM and Director of Governance.

#### Late Bids

It is recognised that late bids will sometimes be received whether this is before the bid opening meeting or afterwards.

As a generality, late bids received before the bid opening meeting can be considered provided that the bids already received on time have been secured such that no officer or person could have had access to the detail of the bids before they are opened.

With regard to late bids received after bid opening, guidance from The Local Government Ombudsman recognises the difficulties facing Councils if a higher offer is received by the Council after another offer has been accepted subject to contract, particularly in view of the obligation for Councils to achieve best consideration. Such difficulties will be less likely to occur if Councils ensure that exchange of contracts takes place quickly after the decision has been made to whom to sell the property.

The decision to consider a late bid is at the discretion of the Divisional Director after consultation with HAM and the Head of Legal Services. Any SUCH DECISION SHOULD BE DOCUMENTED AND SIGNED BY BOTH PARTIES.

Where it is clear that a private "auction" is developing, potential purchasers must be given a specific date and time to reconsider and submit their highest and final bid. If the Council wishes to impose any conditions upon acceptance, i.e. specific completion date, this should be made clear. It is also recommended that potential purchasers are informed that the successful bidder would be given a specific period in which to exchange contracts. This process will be controlled in the same way as receipt of tender bids, incorporating deadline dates for the receipt of best offers and should have the same level of confidentiality.

### **4.3 Transactions at less than Market Value**

Except where the undervalue is less than £250,000, approval must be obtained from the Mayor to disposals or lettings of over seven years which are proposed to be at less than market value. And/or where State Aid issues may arise. The Divisional Director shall seek the agreement of the Mayor by submitting a report to accept a disposal at an under-value. The report shall make the level of under-value explicit and will need to set out the well-being benefits to be derived and whether they have a measurable financial value. If so this value is to be specified. .

The Council has powers derived from the Housing Act 1985 and Local Government Act 1988 [check] to dispose of HRA land to parties including Registered Providers at less than market value For GF land the powers are in the Local Government Act



1972: General Disposal Consent (England) 2003. Other than under these general consents, the Council has to seek the consent of the Secretary of State to dispose of its assets other than by the grant of short leases at less than best consideration.

Where land is held for planning purposes under s233 of the 1990 Act there is no discretion for the Council to dispose at less than market value.

The Council must be able to demonstrate that it has acted reasonably in agreeing a sale at less than market value; that there was an appropriate decision making process and that regard has been had to the Council's statutory and fiduciary duties (see definitions). Decisions must be robust and defensible and the monetary or intangible benefit assessment of impacts will require detailed individual assessment in every case.

The Divisional Director will establish and keep under review a timetable for each disposal and will advise the AMB and shall provide a detailed report on an agreed basis to the Corporate Director, Resources on the progress of disposals for financial planning purposes.

#### **4.4 Conflict of interest**

The authority requires agents and bidders to identify any actual, potential or perceived conflict of interest in relation to the authority and its organisation. The concept of a conflict of interest includes any situation where relevant staff members and elected officials have, directly or indirectly, a financial, economic or other personal interest which might be perceived to compromise their impartiality and independence in the context of the disposal process.

Where there is any indication that a conflict of interest exists, may arise or be perceived then it is the responsibility of the staff member, bidder or agent to inform the authority, detailing the conflict.

Included within the bid pro-forma sent to all bidders will be the following question:

*"Please confirm whether there are any actual, potential or perceived conflicts of interest in relation to the authority and your organisation (limited to persons dealing with the negotiation and/or acquisition of the site in question)? Yes/No. If yes, please detail the conflict of interest below."*

## 5.0 Authority

Disposal of surplus property will be dealt with through the Mayor, usually in Cabinet, except where the value is less than £250,000. Any report to the Mayor or Cabinet will provide a recommendation from the Divisional Director/HAM about the proposed method of sale and whether the sale should be freehold or long leasehold.

The Mayor or Cabinet will usually be asked to delegate all matters relating to the sale to officers without referring offers back to the Mayor or Cabinet for final approval.

In all dealings with property matters it is essential that the highest levels of probity and confidentiality are maintained to ensure that best consideration is achieved under the Council's statutory duty.

Members have a both a fiduciary duty and statutory duties to the residents of the Borough to obtain best consideration.

## 6.0 Definitions

### **"Auction"**

An auction quickly concludes completion and identifies the successful bidder who will sign a binding contract at the sale and exchange a 10% deposit. It is particularly suitable for properties for which there is likely to be keen competition from a wide market of potential cash purchasers, or for properties of an unusual nature but for which there is likely to be a ready market.

However, it is often inappropriate for properties where the majority of purchasers will prefer to submit offers subject to contract and to minimise the risk of abortive costs, such as development land, housing sites, etc.

### **"Fiduciary duty"**

Fiduciary duty has been described as a duty to act in "a fairly business-like manner with reasonable skill and caution". The relevant principles established from case law can be summarised as follows:

- (a) Local Authorities are under a special duty in the exercise of all their powers to consider the financial consequences for the Rates and Council Tax payers. This duty is proportionate and equivalent to the fiduciary duty owed by a person in the position of trustee.
- (b) In considering the financial consequences of a decision, an Authority is required to conduct a balancing exercise between the interests of those who will benefit from the proposed measure and the cost to Rates and Council Tax payers.
- (c) Failure to have proper regard to their fiduciary duty renders a Local Authority decision liable to challenge on the grounds of illegality.
- (d) The fact that an Authority may have an electoral mandate for their decision is irrelevant to the question of whether the act is ultra vires.

### **“Formal Tender”**

This method of disposal creates contractual certainty as, at the final stage, if an offer is accepted it constitutes a legally binding contract. As with an informal tender, the sale will be advertised with a deadline by which prospective purchasers must submit their bid. Each tender document from the bidders must include the full legal contract for sale and a bankers draft as a deposit on the contract. As soon as the “best bid” is selected, the bankers draft is accepted and contracts are automatically exchanged. The successful bidder is then committed to the contract and will have to complete the sale on the appointed date. This form of sale is generally rarely used due to its complexity.

### **“Informal tender”**

This is a flexible method of securing offers of interest in property since it does not bind either party until completion of negotiations. Property is openly marketed and all offers have to be submitted by a fixed closing date. It does not preclude the purchaser or vendor from seeking to renegotiate more advantageous terms even when the sale is at a fairly advanced stage to take account of any changes in circumstances.

Risks inherent in this can be partly overcome by stipulating time limits for exchanging contracts. This method allows the Council to view a number of competing proposals on a site where the Council has no fixed policy as to exactly what is required or wanted and where consideration can be given to a number of options without contractual obligations to the parties involved.

### **“Market Value”**

The estimated amount for which a property should exchange on the date of valuation between a willing buyer and a willing seller in an arm’s length transaction after proper marketing wherein the parties had each acted knowledgeably, prudently and without compulsion.

### **“Special purchaser”**

A purchaser to whom a particular asset has special value because of advantages arising from its ownership that would not be available to general purchasers in the market.

### **“The General Disposal Consent 2003**

For GF land, the Council will need to meet its obligations in relation to the disposal of assets under Local Government Act 1972 and the General Disposal Consent (England) 2003 disposal of land for less than the best consideration that can reasonably be obtained (“the Consent”).

Under the Consent a Local Authority has discretion to sell at an “undervalue” of up to £2,000,000. Undervalue is defined as “the difference between the unrestricted value of the interest to be disposed of and the consideration accepted”.

Where an under-value of less than £2,000,000 exists an Authority can dispose at less than market value provided that certain criteria are met. The full definition from the Consent is:

“(a) the Local Authority considers that the purpose for which the land is to be disposed is likely to contribute to the achievement of any one or more of the following objects in respect of the whole or any part of its area, or of all or any persons resident or present in its area;

- i) the promotion or improvement of economic well-being;
- ii) the promotion or improvement of social well-being;
- iii) the promotion or improvement of environmental well-being; and

(b) the difference between the unrestricted value of the land to be disposed of and the consideration for the disposal does not exceed £2,000,000 (two million pounds)”.

Where an Authority intends to dispose of land where the difference between the unrestricted value of the interest to be disposed of and the consideration accepted ("the undervalue") is more than £2,000,000 (two million pounds) the requirement is for Authorities to seek specific consent from the Secretary of State.

In determining whether or not to dispose of land for less than the best consideration reasonably obtainable, and whether or not any specific proposal to take such action falls within the terms of the Consent, the Council should ensure that it complies with normal and prudent commercial practices, including obtaining the view of a professionally qualified valuer as to the likely amount of the undervalue.

It will be for the Council to decide whether any proposed disposal requires specific consent under the 1972 Act, since the Secretary of State has no statutory powers to advise authorities that consent is needed in any particular case. Once an application for a specific consent is submitted, the Secretary of State is obliged to make a decision on the proposed disposal on its merits. However, if he/she is of the opinion that consent is not required (i.e. the sale is not at an undervalue), or if he/she believes that the case falls within the terms of the Consent, the statutory function to give specific consent will not arise. Where the Council is uncertain about the need to seek consent, it may seek legal advice on the matter. It is recommended that an authority may find it useful to keep its appointed auditor informed of any legal advice it receives and the proposed action it wishes to take. An auditor has a duty to consider whether the authority is acting lawfully.

The Secretary of State will require the following information:

- i. a written description of the site and buildings, its physical characteristics, location and surroundings together with a plan which should be accurate enough to allow it to be used to identify the land in the Secretary of State's decision in cases where consent is given;
- ii. a written description of the authority's tenure and a summary of the details of any leases, encumbrances, such as easements etc. to which it is subject. Details should be given of the purpose(s) for which the authority holds the land. Normally land is held for the purposes of the power under which it was

- acquired, or taken on lease, unless it has since been formally appropriated to another purpose;
- iii. a written description of the existing use(s), current planning consents and alternative planning uses(s) that are likely to be permitted;
  - iv. a summary of the proposed transaction, noting the reasons for disposing at an undervalue, the key terms and any restrictions to be imposed by the authority; and
  - v. a detailed Valuation Report covering the matters listed in the Technical Appendix, and signed by a qualified valuer (a member of the RICS). The Department would normally expect the valuation to have been undertaken no earlier than six months before the submission.

**Money Laundering, bribery and corruption**

The Council will minimise the risk of the above by employing reputable firms of chartered surveyors to act as its agents as such firms have their own systems in place to avoid such situations developing. However, the council's Head of Legal Services has been asked to advise on these matters and the AM should report to HAM if this is suspected and HAM will liaise with the Council's solicitor prior to taking any action in this regard.

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<p><b>Cabinet</b></p> <p>31 July 2019</p>	 <p><b>TOWER HAMLETS</b></p>
<p><b>Report of:</b> Ann Sutcliffe, Corporate Director of Place</p>	<p><b>Classification:</b> Unrestricted</p>
<p><b>Land to the West of Virginia Street - London Dock School</b></p>	

<b>Lead Member</b>	<b>Mayor John Biggs</b>
<b>Originating Officer(s)</b>	Alan McCarthy
<b>Wards affected</b>	St Kathrine's & Wapping
<b>Key Decision?</b>	Yes
<b>Forward Plan Notice Published</b>	11 June 2019
<b>Reason for Key Decision</b>	Financial Threshold
<b>Strategic Plan Priority / Outcome</b>	<ol style="list-style-type: none"> <li>1. People are aspirational, independent and have equal access to opportunities;</li> <li>2. A borough that our residents are proud of and love to live in;</li> <li>3. A dynamic outcomes-based Council using digital innovation and partnership working to respond to the changing needs of our borough.</li> </ol>

## Executive Summary

Land to the west of Virginia Street formed part of the former News International site. Planning permission was granted for this site several years ago for the delivery of a mixed development comprising residential, offices, leisure uses, shops and a new secondary school. Under the terms of the Section 106, the Council is to enter into a long lease for the secondary school.

This report seeks approval to enter into a lease and sub-lease to enable the school to be built and occupied, and to approve the delegation of authority to the Corporate Director of Place to commence the procurement process, accept the tender price and let the construction contract for delivering the new school building.

## **Recommendations:**

To enable a new school to be built and opened on the land to the west of Virginia Street, the Mayor in Cabinet is recommended to delegate authority to the Corporate Director of place:

1. the negotiation and completion of the lease between The Council and St George, the developer.
2. the negotiation and completion of the sublease between The Council and Mulberry Trust
3. to run an EU compliant procurement process and negotiate, agree and let the construction contract

## **1 REASONS FOR THE DECISIONS**

- 1.1 Without approval the Council cannot enter into a long lease for the site and a new secondary school will not be built.

## **2 ALTERNATIVE OPTIONS**

- 2.1 There are no other alternative options for entering into a lease. The requirement for the Council to enter into a lease was explicit in the Section 106 agreement and the appended documents.
- 2.2 The major projects team have looked at the various options for procuring construction services for delivering the school. The approach to this procurement is detailed further in this report.

## **3 DETAILS OF THE REPORT**

- 3.1 This report relates to part of the broader News International site in Wapping. Several years ago planning permission was secured across this site for a substantial mixed development. Planning permission was granted for the demolition of the print works and associated buildings and the creation of 8 towers which will create nearly 2,000 homes, 20,816 sq metres of retail, restaurants and other non-residential uses, a new secondary school for 1,200 pupils and 2.2 hectares of open space. The development will be delivered in several phases and over 15 years. Phase 1, consisting of Blocks A, B and C have been completed. Block D will be completed later this year with occupation by tenants in Feb 2020 as most of the flats are already sold.
- 3.2 The section 106 entered into as part of the planning permission required the developer to set aside land for a new secondary school. The Council was required to notify the developer of the intention to exercise the option to take up the site for a new school and complete a 125 year lease.
- 3.3 On 18 November 2018, Cabinet approved the development of a new secondary school at the land to the West of Virginia Street as part of the



report covering 'Planning for School Places'. The November Cabinet report also approved the budget for the new school project of £52m. This budget will cover the build contract, fitting out the space and professional fees.

3.4 The Children's Services department has confirmed that they are definitely taking this site up to create a new school. Children's services, in accordance with DfE guidelines have identified Mulberry Trust to run the school. Following the analysis of primary school pupils in the Borough, they anticipate this new secondary school will need to open in September 2022. The 2022 date has dictated the timescales for whole project.

3.5 The Children's Services department has worked closely with Mulberry Trust to design the new secondary school and submitted a planning application in April with the expectation of obtaining planning approval late summer. In the meanwhile, to comply with the terms of the Section 106 agreement, the Council will need to enter into a lease for the site. The main heads of terms for the lease are as follows:

Landlord:	St George
Head lessees:	LB Tower Hamlets
Subtenant:	Mulberry Trust
Period:	125 years
Rent:	Peppercorn
Alienation:	Draft silent as to subletting/assignment
Use:	For a secondary school only
Insurance:	The council to insure
Repair:	Tenants responsibility
Special conditions:	The landlord has the right to terminate in the event that the works to build the school not started within a year of the lease completion date, incomplete within 3 years of the lease completion and if the building is not occupied as a school for 3 years

3.6 Whilst a standard form of lease was appended to the Section 106, Asset Management and Legal Services will need to finalise the lease with St George and insure the documents reflect current standards, legislation and Tower Hamlets current needs.

3.7 The Council will also need to enter into a sub-lease with Mulberry Trust as the school provider. The sublease will mirror the Council's lease so there is a consistent approach and minimal liabilities for the Council.

3.8 In leading the project the Major Projects team have selected an architect who has designed the school to meet the Council's brief and the DfE BB103 guidance. Regular progress meetings were held with the Design Team to monitor progress of work.

3.9 The Major Projects team intend to use the LHC framework for procuring a contractor. The LHC framework was adopted after looking into various

options of procuring the work. The benefit of using an established Framework is that the all of the requirements of OJEU have already been complied with and shortlists of competent contractors already signed up. This eliminates the need for contractors to complete a first stage Pre-Qualification Questionnaire (PQQ) which would involve the client, consultants and constructors in a protracted and time consuming process. The stage 1 tender process will commence on 14<sup>th</sup> June with the contractors that have expressed interest.

3.10 The programme for the procurement is as follows:

Stage 1	Tender process starts	7 <sup>th</sup> June 2019
	Return date for stage 1	August 2019
	Tender evaluation and report to procurement board	16 <sup>th</sup> Aug to 20 <sup>th</sup> Sep 2019
	Enter in to PCSA with successful contractor	1 <sup>st</sup> November 2019
Stage 2	Final tender report to be taken through Tollgate 2 and presented to Procurement board.	25th April to 13th May 2020
	TH to enter into a fixed price contract with the contractor	14th May to 25th June 2020.
	Contractor to start on site	July 2020
	Targeted completion date	July 2022
	School open	September 2022

3.11 This report seeks approval of the Mayor to delegate authority to the Corporate Director to:

- Run an EU compliant procurement process
- Report to Procurement Board
- Agree and enter into construction contract and other associated agreements

#### **4 EQUALITIES IMPLICATIONS**

4.1 Access to good quality schooling is essential to meet the changing demands of the workplace and in the long term will have a main role to play in terms of lifting poverty and inequality.

#### **5 OTHER STATUTORY IMPLICATIONS**

5.1 **Consultations** – The Education department have undertaken consultation as part of taking this site forward for education purposes. There will be further work with stakeholders as the works are progressed and open date draws closer. There is also statutory consultation as part of the planning process.

5.2 **Best Value Implications** – As part of the tender process, the major projects team will need to satisfy the procurement board in terms of value for money etc. They intend to report to the procurement board twice before awarding the full contract.

5.3 **Risk Management Implication – Lease completion and Project delivery**

<b>Risk</b>	<b>Mitigation</b>
The developer reneging on delivering a school as lease not completed	For project team to formally engage with developer so there is no doubts as to TH's intentions.  For engagement with the developer on matters like the access plan and boundary arrangement.
Some of the terms of the lease no longer suit either party	AM with Legal services to make sure the lease meet current standards and is appropriate
Procurement timetable unrealistic meaning that the school will not be able to occupy the space in September.	The education department are looking at vacant buildings, and sites that may be able accommodate up to 150 pupils and staff for a few months. The project manager has also been asked to look if there could be a phased completion allowing some space to be ready and usable before the whole.
Contractor become financially unstable	The PM will need to carry out their due diligence on the contractors to sure there is financial capacity to deliver the works.

**6 COMMENTS OF THE CHIEF FINANCE OFFICER**

6.1 The development of land to the West of Virginia Street which formed part of the former News International site was granted planning permission several years ago. As part of the s106 planning consent land was set aside and earmarked for a school to be built.

6.2 Budget approval for this mixed development was approved on 18 November 2018 and included the provision of a new secondary school complex. Budget for this project totalled £52m and forms part of the current pipeline capital programme.

- 6.3 Funding for building the school has been identified within the capital programme from a variety of sources including existing uncommitted grant £0.345m, s106 income £2.8m, CIL £8m and the remaining £40.9m from borrowing. The revenue implications of this additional borrowing have been considered as part of the medium term financial planning process.
- 6.4 Both s106 and CIL monies that can be assigned to education build programmes is limited. There is £8.3m of s106 monies available for education facilities that have not been committed to date. However there are competing priorities for this money and utilising £2.8m for this scheme will leave a reduced balance of £5.5m for future projects.
- 6.5 The Education team are currently in negotiation with the Department for Education regarding any government funding that may be available for the project. A number of documents have been requested and provided in support of the application and a decision around grant funding is expected shortly.
- 6.6 As the funding has been built without significant assumptions around using Department for Education grant monies, any amounts received will reduce the Council's requirement for borrowing and ease future pressures on the General Fund revenue position.

## **7 COMMENTS OF LEGAL SERVICES**

- 7.1 This report seeks a delegation to the Corporate Director, Place, pursuant to s106 agreement as set out in 3.5 and 3.6 of this report to acquire and dispose of the property.
- 7.2 The Council, as a Local Education Authority, has a duty under Section 14(1) of the Education Act 1996 to secure that sufficient schools for providing primary education are available in its area. Section 14(2) clarifies that "sufficient" means that they must be sufficient in number, character and equipment to provide for all pupils the opportunity of appropriate education. The proposal to build additional primary school provision seems to be consistent with, and in pursuit of, that duty.
- 7.3 In deciding what provision to make in respect of primary and secondary schools, the Council is required to consider the need to secure diversity in the provision of schools and increasing opportunities for parental choice. This sits alongside the Council's general equality duty, which requires it to have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who don't. Equalities analysis will need to be carried out alongside the development of proposals.

- 7.4 The Localism Act 2011 gives Local authority's the general power of competence (Part 1, chapter 1) states "A local authority has power to do anything that individuals generally may do".
- 7.5 The Council's powers in relation to disposal of property (which includes the granting of leases) are set out in legislation. Having regard to the extended scope of the policy, section 123 of the Local Government Act 1972 (the "1972 Act"). .
- 7.6 The 1972 Act provides that the Council may dispose of land for a consideration not less than the best that can reasonably be obtained, failing which the consent of the Secretary of State is required. However, the requirement for best consideration does not apply in respect to buildings held in the General Fund and the Council can therefore lawfully grant the sublease on the terms set out in the report.
- 7.7 The Council is obliged as a best value authority under section 3 of the Local Government Act 1999 to "make arrangements to secure continuous improvement in the way in which its functions are exercised having regard to a combination of economy, efficiency and effectiveness'. The information within the report suggests that the proposed acquisition and disposal will secure the objectives set out in the 1999 Act.
- 7.8 The Council will complete a European Law compliant tendering exercise in order to determine the identity of the Construction contractor and other associated contractors / consultants for the completion of the project.
- 7.9 Not only is the Council required to follow the European law when tendering opportunities of the likely values stated in the report, such tendering will also demonstrate compliance with the Best Value duty as the tendering will be on a Most Economically Advantageous basis having been evaluated on a blend of quality and price.

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## **Linked Reports, Appendices and Background Documents**

### **Linked Report**

- **Cabinet Report - November 2018 School places report**

### **Appendices**

- None


### **Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012**

- None

### **Officer contact details for documents:**

Or state N/A

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<p><b>Cabinet</b></p> <p>31 July 2019</p>	 <p><b>TOWER HAMLETS</b></p>
<p><b>Report of:</b> Ann Sutcliffe, Corporate Director Place</p>	<p><b>Classification:</b> Partially exempt (appendix one)</p>
<p><b>Angela Court, 315 Burdett Road; Lease to Mulberry Housing Society</b></p>	

<b>Lead Member</b>	<b>Cllr Islam, Cabinet Member for Housing</b>
<b>Originating Officer(s)</b>	Ralph Million, Senior Strategic Asset Manager Paul Butler, Head of Strategic Finance, Place
<b>Wards affected</b>	Mile End
<b>Key Decision?</b>	Yes
<b>Forward Plan Notice Published</b>	TBA
<b>Reason for Key Decision</b>	Financial Threshold; “to result in the relevant local authority incurring expenditure which is, or the making of savings which are, significant having regard to the relevant local authority’s budget for the service or function to which the decision relates.”
<b>Strategic Plan Priority / Outcome</b>	<ol style="list-style-type: none"> <li>1. People are aspirational, independent and have equal access to opportunities;</li> <li>2. A borough that our residents are proud of and love to live in;</li> <li>3. A dynamic outcomes-based Council using digital innovation and partnership working to respond to the changing needs of our borough.</li> </ol>

**Executive Summary**

The report proposes that the Council grants a lease of Angela Court, Burdett Road to Mulberry Housing Society (MHS) on the terms set out, under which MHS will operate the building as affordable housing.

## **Recommendations:**

The Mayor in Cabinet is recommended to:

1. Agree to grant a lease of Angela Court, Burdett Road to Mulberry Housing Society on the main terms set out in paragraph 3.11 of the report.
2. Delegate to the Corporate Director of Place, in consultation with the Corporate Director of Resources, authority to negotiate a lease with Mulberry Housing Society that substantially reflects the main terms.
3. Note the specific equalities considerations as set out in paragraph 4.1.

## **1 REASONS FOR THE DECISIONS**

- 1.1 The grant of a lease to MHS is a necessary part of the overall arrangements between the Council and MHS, to allow it to take on and operate the property as affordable housing. The Council has secured these 42 social rented homes through a s106 agreement and the proposed arrangement will entrust MHS to provide this affordable housing for the next 40 years, with grant provided to compensate MHS for the reasonable costs of providing these homes.

## **2 ALTERNATIVE OPTIONS**

- 2.1 The Council has various options for the future use of the units in the building. The main options are;
  - Transfer the units to MHS at or soon after completion. The mechanism for such a transfer is proposed as on a leasehold basis. This is the preferred option.
  - Hold the units in the General Fund as temporary accommodation (TA). The Council is constrained by the s106 agreement provisions that the level of rent that it can charge to occupiers must be at social rent levels, and those are typically lower than that generally charged for TA.
  - Hold the units in the HRA as TA or general needs housing. In the TA option the same rent considerations apply as for the General Fund option. For general needs housing let under secure or flexible tenancies, the right to buy will arise in the future.
  - In any of the above scenarios the management of the units could be undertaken by THH or some other body, as the Council or MHS may choose.
  - The units will be freehold assets of the Council which could be sold or let in the future, subject to any restrictions imposed by the s106 agreement.



### **3 DETAILS OF THE REPORT**

3.1 On 10 November 2017, the Mayor agreed a budget of £60m to fund the purchase of new affordable housing in the borough, to be built by developers as part of planning obligations. On 19 June 2018, as part of the programme and in line with the delegated authority given by the Mayor, the Acting Corporate Director of Place agreed to acquire the freehold interest in Angela Court.

3.2 Angela Court is a development of 42 affordable housing units, constructed by Canary Wharf Group, in line with its obligations under a s106 agreement relating to a separate site. The property contains the following accommodation;

<b>Unit size</b>	<b>Number of Units</b>	<b>Tenure</b>
1 Bed	5	Social Rented Housing
2 bed	5	Social Rented Housing
3 Bed	30	Social Rented Housing
4 Bed	2	Social Rented Housing

3.3 On 22 March 2019, the Council exchanged contracts to purchase the property, with completion of the sale to take place following practical completion of the construction. This has now been achieved and the Council and MHS Board need to agree on arrangements for the future management and occupation of the building.

3.4 MHS is an independent charitable community benefit society that was established in 2017, as approved by the Mayor in Cabinet in February 2017. The organisation is established to provide affordable homes for the benefit of the residents of Tower Hamlets. The Mayor agreed to set up MHS as a Council-sponsored housing delivery vehicle that could receive grant in the form of Right To Buy receipts and draw on loan finance from the Council. The Society was envisaged to develop new homes on Council-owned land as well as to acquire homes for use as affordable housing, including through s106 Planning agreements. MHS is run by a Board comprising three independent members and two Council nominees.

3.5 The proposal in this case is for MHS to enter into a lease with the Council for Angela Court, whereby the Society will pay for the lease using Right To Buy receipts and loan funding and will cover its management and maintenance costs, as well as the cost of repaying the loan funding and interest, from the rent income from letting the 42 social rented flats to families rehoused via the Common Housing Register. .

3.6 The Board of MHS have been advised of the proposed terms of the lease and will be seeking independent legal advice before reaching a decision to acquire the leasehold interest. MHS will also need to approve formally to accept the terms of the grant agreement, the loan facility and finally to enter into a management agreement for the management and maintenance of the block.

- 3.7 MHS may decide to contract with Tower Hamlets Homes to carry out this managing agent role. This is a decision for the MHS Board and not a matter for approval as part of this report. The principle of lending funds to MHS was approved by the Mayor in February 2017 and the terms of the loan delegated to the Corporate Director of Resources. The granting of RTB receipts to MHS has already been approved by the Grants Determination Sub-Committee.
- 3.8 The Council will acquire the freehold of the 42 units using its own capital resources at a cost set out in the exempt appendix and lease the properties to MHS at market value (the same value as the acquisition cost). MHS will obtain a loan from the Council for 70% of this value, receiving a grant from the Council for the remaining 30%, using 1-4-1 right to buy receipts. The grant in effect compensates MHS for the costs of providing these affordable homes for the next 40 years. The valuation advice obtained by the Council demonstrates that this is reasonable compensation and does not amount to over-compensating MHS, which otherwise would fall foul of State Aid regulations.
- 3.9 The Council will recover its capital outlay through the lease charge levied to MHS.
- 3.10 The main terms of the proposed lease are set out below. A draft lease has been produced by the Council in line with these terms. The Board of MHS will need to review and approve the draft lease, which process may result in some revisions. Recommendation 2 of the report is intended to allow for any such future changes to be considered and agreed at officer level, provided that they are within the scope of delegation.
- Length; 40 years
  - Premium; The sum set out in the exempt appendix one, being the same amount as paid by the Council to acquire the freehold interest in the property.
  - Rent/rent cap; Social Target Rents
  - Use; Affordable housing. MHS to carry out housing management functions in accordance with a specification to be annexed to the lease.
  - Repairs/maintenance; MHS to be responsible for all repairs and maintenance.
  - Insurance; Council to insure, MHS to repay the premium.
  - Assignment/sub-letting; No assignment or sub-letting of the whole or part of the property, except for occupational tenancies of individual units in a form agreed with the Council.
  - Alterations; No new building or changes affecting the exterior without the Council's consent.
  - Landlord and Tenant Act 1954; the security of tenure provisions in ss24-28 will be excluded.

- 3.11 The proposal is that the property is acquired into the General Fund. As such the disposal, by way of the grant of the proposed lease, is covered by s123 of the Local Government Act 1972. This requires that, except with the consent of the Secretary of State, a disposal by the Council must be at not less than the best consideration reasonably obtainable. The proposed lease terms, which involve the payment of a premium equivalent to the freehold purchase price along with on-going rent payments by MHS, represent an arrangement above best consideration.

#### **4 EQUALITIES IMPLICATIONS**

- 4.1 The 42 units in the building are to be used as affordable housing, which will contribute to meeting the housing needs of people in the borough with identified priority.

#### **5 OTHER STATUTORY IMPLICATIONS**

- 5.1 The statutory implications arising from the grant of the lease are covered in paragraphs 3.7 and 3.8.

- 5.2 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:

- Best Value Implications,
- Consultations,
- Environmental (including air quality),
- Risk Management,
- Crime Reduction,
- Safeguarding.
- Data Protection / Privacy Impact Assessment.

- 5.3 [Report authors should identify any other specific issues relevant to consideration of this report. Including, but not limited to, the issues noted above. This section of the report can also be used to re-emphasise particular issues that Members must have considered before taking the decision (for example issues that may come up if an objection was taken to court). Note – Paragraph 5.1 MUST NOT be deleted.]

#### **6 COMMENTS OF THE CHIEF FINANCE OFFICER**

- 6.1 On 10<sup>th</sup> November 2017 the Mayor approved the adoption of a capital estimate of £60m to fund the purchase of new housing in the Borough, built by developers as part of their planning obligations.
- 6.2 The Mayor in Cabinet on 7<sup>th</sup> February 2017 approved the establishment of Mulberry Housing Society, a charitable Community Benefit Society (CBS), to provide homes for sub-market rent. It was agreed that £30 million of

resources would be made available to the CBS, including an allocation of retained Right to Buy receipts of up to £9 million, representing 30% of the total financing available. This funding has been incorporated within the Council's capital programme and as a grant is given to a third party any allocations are also approved by the Grants Determination Sub-Committee.

- 6.3 Burdett Road represents the first of these schemes where 42 units will be purchased from Canary Wharf Group and let at social rent levels. The Council will acquire the freehold to these properties which will be let through Mulberry Housing Society.
- 6.4 These acquisitions provide new properties at good value as they are purchased for less than the open market value of similar properties due to the restrictions on their use as affordable homes. Rental levels are set in accordance with the terms of the appropriate s106 agreement and usually include units to be let at social rents.
- 6.5 The freehold will be acquired using Council capital resources at a cost set out in the exempt appendix. To date a 10% deposit has been paid and the remaining amount will be paid on legal completion.
- 6.6 The Council will lease the properties to Mulberry Housing Society, who will obtain a loan from the Council for 70% of this value. The lease will be of the same value as the acquisition cost incurred by LBTH. Mulberry Housing Society will repay the loan plus an amount for interest over the life of the freehold, enabling LBTH to recover its costs plus a contribution towards the opportunity cost of investing in this scheme. The Council contribution is limited to the remaining 30% which will be met through a grant using 1-4-1 RTB receipts.

## **7 COMMENTS OF LEGAL SERVICES**

- 7.1 The Council's power to dispose of land is set out in s123 of the Local Government Act 1972. It is subject to the requirements set out in that Act, most notably the s123 requirement to obtain best consideration for any disposal.
- 7.2 The Council has the legal entitlement to use Right to Buy receipts for the purposes described in this report. This is because the Council entered into a Retention Agreement with the Secretary of State in November 2012
- 7.3 Under s.24 of the Local Government Act 1988, the council has power to provide a range financial assistance to any person in connection with the acquisition of property to that is intended to be privately let as housing accommodation' i.e. housing where the immediate landlord is not a local authority, Financial assistance includes loans, grants and guarantees. The council can rely on this power to advance loans/grants to MHS. The use of this power is subject to Secretary of state consent. The Secretary of state has

issued pre-approved consents in the “General Consents 2010” (updated 2011) This includes General Consent C upon which the council can rely.

7.4 The Council is lending to the CBS at a rate comparable with that available on the market generally. Therefore, the CBS does not gain a financial advantage over other providers in the same market place by borrowing the money from the Council. Also, the levy by the Council of a commercial rate of interest means that the Council has the legal power enter into the arrangement

7.5 Public bodies are allowed to provide grant support to private bodies where the purpose is to cause the provision of services which would not otherwise be available in the market place or available but not on favourable conditions, provided such services are in the General Economic Interest. Also, the level of support should be only that which it is reasonable to give in order to compensate the provider for the costs of providing the relevant service.

7.6 The making by the Council of the grant is designed to create the availability of accommodation at a social level of rent. This purpose is recognised under state aid law as being a service of general Economic Interest. Also, an assessment has been undertaken to demonstrate that the level of compensation provided is not greater than the costs that are reasonably likely to be incurred by the CBS and therefore the making of the grant does not constitute state aid.

The use of the funds will be subject to a grant agreement which details the level of compensation and that the compensation is only available on demonstration of the appropriate use of the funds. This also guards against over compensation as well as demonstrating that the Council is receiving Best Value as regards the use of the funds.

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## **Linked Reports, Appendices and Background Documents**

### **Linked Report**

- None.

### **Appendices**

- Exempt Appendix 1

### **Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012**

- None.

### **Officer contact details for documents:**

Ralph Million, 7364 4609

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

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<p><b>Cabinet</b></p> <p>31 July 2019</p>	
<p><b>Report of:</b> Neville Murton, Corporate Director Resources</p>	<p><b>Classification:</b> Unrestricted</p>
<p><b>Revenue and Capital Budget Monitoring Quarter 1 2019-20</b></p>	

<b>Lead Member</b>	<b>Councillor Ronald, Cabinet Member for Resources and the Voluntary Sector</b>
<b>Originating Officer(s)</b>	Allister Bannin, Head of Strategic and Corporate Finance
<b>Wards affected</b>	All wards
<b>Key Decision?</b>	No
<b>Forward Plan Notice Published</b>	04/07/19
<b>Reason for Key Decision</b>	N/A
<b>Strategic Plan Priority / Outcome</b>	<p><b>1. People are aspirational, independent and have equal access to opportunities.</b></p> <p><b>2. A borough that our residents are proud of and love to live in.</b></p> <p><b>3. A dynamic outcomes-based Council using digital innovation and partnership working to respond to the changing needs of our borough.</b></p>

### Executive Summary

This report introduces the budget monitoring report for Quarter 1. It includes details about General Fund revenue, Dedicated Schools Grant (DSG), Housing Revenue Account (HRA) and progress made against savings targets. It also includes capital approval requests to adopt new schemes into the Council's approved capital programme and to change existing capital schemes.

### Recommendations:

The Mayor in Cabinet is recommended to:

1. Note the Council's projected outturn position against General Fund, Dedicated Schools Budget and Housing Revenue Account budgets agreed for 2019-20, based on information as at the end of June as detailed in the Appendices.
2. Adopt listed pipeline schemes as set out in Appendix 6 into the Council's

approved capital programme.

3. Agree that approval to proceed to award contracts for works and services be delegated to the Corporate Director, Place in consultation with the Corporate Director, Governance, subject to tenders being within the capital estimate amount and scheme PIDs being approved at Capital Strategy Board.
4. Note and approve the capital exception and change note summary in Appendix 6.
5. Note that there are no equalities implications directly resulting from this report, as set out in Paragraph 4.

## **1 REASONS FOR THE DECISIONS**

- 1.1 The Council could choose to monitor its budgetary performance against an alternative timeframe but it is considered that the reporting schedule provides the appropriate balance to allow strategic oversight of the budget by members and to manage the Council's exposure to financial risk. More frequent monitoring is undertaken by officers and considered by individual service directors and the Council's Corporate Leadership Team (CLT) including approval of management action.
- 1.2 To the extent that there are options for managing the issues identified these are highlighted in the report in order to ensure that members have a full picture of the issues and proposed solutions as part of their decision making.

## **2 ALTERNATIVE OPTIONS**

- 2.1 The regular reporting of Revenue and Capital Budget Monitoring information through the year and the preparation of the provisional outturn position after the year end provides detailed financial information to members, senior officers and other interested parties on the financial performance of the Council. It sets out the key variances being reported by budget holders and the management action being implemented to address the identified issues.
- 2.2 Further information across the Council's key financial activities is also included to ensure that CLT and Members have a full picture to inform their consideration of any financial decisions set out in this report and also their broader understanding of the Council's financial context when considering reports at the various Council Committees.
- 2.3 Set alongside relevant performance information it also informs decision making to ensure that Members' priorities are delivered within the agreed budget provision.

- 2.4 It is important that issues are addressed to remain within the approved budget provision or where they cannot be contained by individual service management action, alternative proposals are developed and solutions proposed which address the financial impact; CLT and Members have a key role in approving such actions as they represent changes to the budget originally set and approved by them.

### **3 DETAILS OF THE REPORT**

- 3.1 On 20 February 2019 the Council considered and agreed the Revenue Budget and Council Tax for 2019-20; and a capital programme showing resources available for investment in assets and infrastructure for ten years until 2028-29. The Council also agreed the Housing Revenue Account (HRA) budget from 2019-20 which includes rent setting and other charges.
- 3.2 The net budget requirement for 2019-20 has been set at £342.5m. The MTFP indicates a balanced budget for 2019-20, which includes delivering savings of £25.1m (£14.8m for 2019-20, and £10.3m slippage from previous years) and anticipates the Council will still need to deliver further annual savings of £14.6m and £8.2m in 2020-21 and 2021-22 respectively.
- 3.3 The General Fund is projecting a forecast overspend of £8.2m after the application of reserves and corporate contingency. Directorates are developing recovery plans to reduce this overspend and therefore reduce the requirement on General Fund reserves funding.
- 3.4 The Dedicated Schools Grant (DSG) is projecting a forecast overspend of £7.4m.
- 3.5 The Housing Revenue Account (HRA) is projecting a forecast underspend of £2.2m.
- 3.6 There are a number of new capital approval requests and these are detailed in Appendix 6. The Mayor in Cabinet is recommended to approve 5 new capital projects totalling £20.6m for inclusion in the Council's capital programme and approve additional resources totalling £46.6m for 10 existing capital schemes.

### **4 EQUALITIES IMPLICATIONS**

- 4.1 There are no equality implications directly resulting from this report.

### **5 OTHER STATUTORY IMPLICATIONS**

- 5.1 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are

required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:

- Best Value Implications,
- Consultations,
- Environmental (including air quality),
- Risk Management,
- Crime Reduction,
- Safeguarding.
- Data Protection / Privacy Impact Assessment.

5.2 There are no other statutory implications contained in this report.

## **6 COMMENTS OF THE CHIEF FINANCE OFFICER**

6.1 The attached report is primarily financial in nature and the financial implications of the issues raised have been included in the main report.

## **7 COMMENTS OF LEGAL SERVICES**

7.1 The Council is required by section 151 of the Local Government Act 1972 to make arrangements for the proper administration of its financial affairs. The Council's chief finance officer has established financial procedures to ensure the Council's proper financial administration. These include procedures for budgetary control. It is consistent with these arrangements for Cabinet to receive information about the revenue and capital budgets as set out in this report.

7.2 The report also requests the allocation of various sources of funds and the delegation of the authority to spend those funds. The Council has the legal powers to carry out the various items of work.

7.3 The Council has the duty to achieve Best Value in terms of economy, efficiency and effectiveness in the delivery of its services and the expenditure of its resources. The report details that the expenditure of the money will be based upon competitive exercises performed either individually or through the use of pre-existing framework agreements. The methodology of the particular framework to be used will need to be checked by Legal Services in order to ensure that the use of the particular framework satisfies the Council's European Law obligations, but ostensibly the award of contracts under a competitive procedure will demonstrate Best Value.

7.4 It is anticipated that the contracts resulting from the competitive exercises will include appropriate clauses to allow the Council to monitor the delivery of the contracts. This will allow the Council to ensure the quality of the Works and Services meets the tendered level and also safeguard Best Value.

7.5 It is clear that some of the schemes are likely to have an impact on people who have a protected characteristic for the purposes of the Equality Act 2010. Therefore, the Council will have to perform equality assessments in respect of each scheme whilst the decision making process as regards the detail of each

scheme is still at a formative stage. It is likely in part at least, that it will be necessary for the Council to carry out consultation exercises in order to properly understand the impact of the schemes on persons with a protected characteristic and thereby to comply with the Council's Equality Act duties.

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## **Linked Reports, Appendices and Background Documents**

### **Linked Report**

- NONE.

### **Appendices**

- A1 Budget Monitoring Report 2019-20 Q1
- A2 Capital Control Budget 2019-20 Q1
- A3 Revenue Control Budget 2019-20 Q1
- A4 Current Savings Performance 2019-22 Q1
- A5 Mayoral Priority Growth 2019-22 Q1
- A6 Capital scheme requests for approval 2019-20 Q1

### **Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012**

- NONE.

**Officer contact details for documents:** N/A

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# Corporate Budget Monitoring Report

## Quarter 1 2019-20

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<b>Directorate positions</b>		
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Circulated to	Cabinet
Date	31 July 2019
Classification	Unrestricted
Report of	Corporate Director of Resources
Lead Member	CLr Ronald, Cabinet Member for Resources and the Voluntary Sector
Originating Officer(s)	Allister Bannin, Head of Strategic & Corporate Finance
Wards affected	All Wards
Key Decision?	No

General Fund forecast outturn variance £8.2m overspend

Dedicated Schools Grant (DSG) forecast outturn variance £7.4m overspend

Housing Revenue Account (HRA) forecast outturn variance £2.2m underspend

£m	2019-20 Forecast Outturn Variance			2019-20 Annual Figures		Figures to 30 June 2019	
	Estimated impact on General Fund GF/ DSG/ HRA	Variance before reserve adjustments	Contribution to /(from) Reserves	Current Budget <sup>(1)</sup>	Forecast Outturn Position	Budget to Date	Actual
Children & Culture (GF)	11.5	12.1	(0.6)	99.6	111.7	24.9	26.2
Resources	2.1	10.1	(8.0)	12.6	22.7	3.1	62.5
HA&C	5.2	5.2	-	139.9	145.1	35.0	26.1
Place	(0.1)	(0.1)	-	72.9	72.8	18.2	6.5
Governance	-	0.8	(0.8)	14.7	15.5	3.7	4.7
Corporate	(10.5)	(10.5)	-	2.8	(7.7)	0.7	2.9
<b>General Fund</b>	<b>8.2</b>	<b>17.6</b>	<b>(9.4)</b>	<b>342.5</b>	<b>360.1</b>	<b>85.6</b>	<b>128.9</b>
<b>Ringfenced Items</b>							
Children's (DSG)	-	7.4	(7.4)	-	7.4	-	41.5
Public Health	-	-	-	-	-	-	(0.7)
HRA	-	(2.2)	2.2	36.7	34.5	(19.8)	(32.3)
<b>Overall Position</b>	<b>8.2</b>	<b>22.8</b>	<b>(14.6)</b>	<b>379.2</b>	<b>402.0</b>	<b>65.8</b>	<b>137.4</b>

Conventions: The use of brackets denotes either an income budget or a positive variance (underspend).

Note 1: The current budget reflects the original budget approved by Members in February 2019 adjusted for any subsequent approved budget virements. The budget history is included as Appendix 3.

In February 2019 the Council approved a revenue budget of £342.5m which was to be financed by external funding sources such as council tax, business rates, grants and drawdown from the Council's Earmarked and General Fund reserves.

The current position is estimated to be a £8.2m overspend on the general fund after the application of £9.4m from reserves.

The HRA is currently projected to show additional income of £2.2m. This is demonstrated by the income from dwelling rents being forecast to be higher than budgeted due to lower levels of Right to Buy sales than was assumed when the budget was set, and void rates are also lower than anticipated.

The MTFP outlined for 2019-20 approved savings of £14.8m in order to deliver a balanced budget. An additional £10.3m relating to slippage from previous years must also be achieved. Therefore in total £25.1m of savings are to be delivered.



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## Quarter 1 2019-20

This report shows the quarter 1 position (as at the end of June) for the financial year. Forecasts at quarter 1 demonstrate an overspend on the general fund of £8.2m. Directorates are developing recovery plans to reduce these overspends and therefore reduce the requirement on general fund reserves funding.

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**£8.2m Overspend on General Fund:** after application of transformation reserves.

**£25.1m Savings:** our total savings requirement for the current year taking into account slippage from earlier years; we believe that £4.4m will slip into future years and that £3.4m is at risk.

**£301m Approved Capital budget:** original allocation of £261m, slippage from previous years of £17m and quarter 1 adjustments of £23m.

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Forecast outturn variance £12.1m General Fund overspend

Forecast outturn variance £7.4m DSG overspend

£m	Forecast Outturn Variance			Annual Figures		Figures to 30 June 2019	
	Estimated impact on General Fund (GF)	Variance before reserve adjustments	Contribution to/(from) Reserves	Current Budget <sup>(1)</sup>	Forecast Outturn Position	Budget to Date	Actual
Children's (GF)	11.5	12.1	(0.6)	99.6	111.7	24.9	26.2
Children's (DSG)	-	7.4	(7.4)	-	7.4	-	41.5

The general fund is projected to be overspent by £12.1m. The overspend is as follows: Children's Social Care £2.9m, Special Educational Needs £1.6m, Youth Services & Commissioning £1.1m, Children's Resources £1.7m and Sports, Leisure and Culture £0.5m.

Unachievable savings of £3.3m (Early Years £2.4m and SEND £0.9m) and slipped savings of £1.0m (Youth Services and Commissioning) are included in the £12.1m overspend.

C&C have a recovery action plan in place that currently suggests a reduction in the forecast overspend to £10.2m before drawdown from reserves of £0.6m (£0.5m for Ofsted and £0.1m to fund one term of EMA as Mayor 3 year funding ended at the end of 2018/19).

Children's Social Care has recently received their Ofsted inspection and is currently awaiting formal notification of the Ofsted rating. Early indications are favourable.

The local growth in SEND, which is not matched by growth in funding, is resulting in budget pressures that are reflected nationally. A range of measures have been put in place to reduce the spending against the general fund as well as the High Needs Funding Block element of the DSG which will show impact over time and actions are being scoped to reduce pressures in the short term during the current financial year.

Details of the significant variances on the General Fund are shown below.

(in numerical descending order)

£m

## Forecast variance commentary

### Children's Social Care

2.9 Much work has been undertaken over the past 12 months to put in place arrangements to reduce the numbers of agency Social Workers and to recruit and retain our own staff. The launch of the Social Work Academy and our continuing work with regard to the recruitment of experienced staff have had a positive impact on ensuring that staff turn-over is much reduced. However we are still require a number of Agency Social Workers to maintain a level of experience and knowledge so that our more complex work can be allocated to those staff with the appropriate level of experience. Therefore, although staff cost pressures are reduced, they will continue for the next 12 months. £0.5m of this overspend relates to extra staffing spend for Ofsted improvement work and will be requested to be funded from transformation reserves.

#### 1. CSC - Staffing £1.0m

Agency workers – pressure reducing as permanent staff are recruited.

#### 2. CSC - Looked After Children (LAC) Placements £1.8m

Work continues to reduce high cost placements

The forecast for the placement budget is based on LAC modelling and sufficiency strategy outcomes. There has been an increase of £0.6m in costs since 2018/19 outturn. Re-commissioning is expected to reduce costs. Reductions are being sought through the regular Panel that scrutinises receptions into care and prioritises placements within our own cohort of foster-care. LAC Placements have increased by 19 from 305 in May 2018 to

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324 in May 2019. The placements budget has 2019-20 savings of £0.3m allocated against Adoption & Fostering. This will be fully achieved.

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**3. CSC – Leaving Care  
£0.9m**

Additional demands

£1m one-off growth in 2018-19 has now ended. We will review the effectiveness of the "Through Care" team in September 2019. Cumulative funding pressure as a result of responsibilities for increase UASC and change in legislation for LA responsibilities for up to age 25. In addition responsibilities for providing accommodation for Dubbs Children.

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**4. CSC – Mental Health  
and Disability  
Services (£0.8m)**

Forecast underspend

Underspends within Mental Health and Disability Services will be held to offset other pressures within CSC.

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**Special Educational  
Needs**

Continued increase of transportation costs. Includes £0.9m unachievable savings.

2.6 This is an ongoing pressure that is likely to increase. Grant Thornton has been commissioned to undertake a deep dive in order to understand the reasons and to recommend actions to address. Their recent report highlights the service is underfunded as there is no annual review to take account of demand, but alongside this during 2018-19 a retendering process resulted in an additional circa £0.8 pressure rather than a saving. Initial recommendations from GT have been discussed with elected members prior to moving forward on the final action plan to reduce cost, which will involve possibly controversial policy changes. No cost reductions are expected this financial year.

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**Early Years**

Unachievable Savings

2.4 These savings are unachievable in 2019-20 due to pressures on Early Years budgets.

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**Contract Services**

Full review of service

1.9 Options for the future delivery of Contract Services were presented to Cabinet in February 2019. The options included recommendations intended to reduce pressures on the budget for this service, including withdrawal of Secondary school catering, withdrawal from schools contract cleaning, a review of adults' welfare meals, and a review of primary schools SLAs. All recommendations were accepted by Cabinet; and an action plan is now in place to reduce pressures. However, the action plan will have a phased impact during 2019/20 with fully delivery from 2020-21.

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**Free School Meals**

0.2 The Mayors Free School Meal Programme now has an agreed Memorandum of Understanding (MoU) between LBTH and Primary schools, which sets conditions for the programme. This is expected to reduce the £0.5m pressure in 2018/19 to £0.2m in 2019/20.

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**Sports Leisure & Culture**

0.5 Recovery action plan proposes reducing spend against AEG income by £0.5m to offset pressures within this service. The action plan provides full details.

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**Building and Technical  
services**

0.1 This overspend is the cost of providing security and NNDR charges for vacant buildings.

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**PFI**

A successful bid was made for a new senior level PFI post which would ensure full compliance and integration with the range of council services which have a bearing on PFI. This post is in the Procurement Service structure, in Resources directorate and will be recruited to in the near future. School leaders are reporting pressures to budgets as a result of the payments due for the PFI. Detailed work around the extent of the pressures across Grouped Schools is currently being undertaken. One of the key drivers for the pressures relates to pupil numbers coming in lower than had been originally forecast. This drove the design specification of the PFI sites, therefore resulting in a situation where a number of schools are receiving lower than forecast pupil funding, whilst having unoccupied PFI buildings/classrooms which need to be paid for.

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<b>The Dedicated Schools Grant (DSG)</b>	£m	The key impact on the DSG is the significant overspend in the High Needs Funding Block element. The actions being taken to address this are outlined below.
<b>High Needs Block (HNB)</b>	7.0	<p>The Council are required to provide to the DfE a recovery plan that articulates how the overspend on the High Needs Funding Block (HNFB) will be addressed over the period 2019 – 2022 through:</p> <ul style="list-style-type: none"> <li>- significantly reducing the funding retained by LBTH to deliver support services,</li> <li>- reducing the demand for centrally retained funding for Alternative Provision,</li> <li>- reducing the rate of increase in EHC plan numbers,</li> <li>- a reduction across all school top-up payments</li> </ul> <p>All of the above are also fully detailed in the C&amp;C Recovery Action Plan.</p>
<b>Local Authority Day Nurseries (LADN)</b>	0.4	A proposal to close the LADNs was agreed by Cabinet on 27/9/18. There is a £0.2m pressure in 2019-20 for residual staff costs to implement closure of the nurseries and £0.2m for building costs.

## Forecast outturn variance £2.1m overspend

£m	Forecast Outturn Variance			Annual Figures		Figures to 30 June 2019	
	Estimated impact on General Fund (GF)	Variance before reserve adjustments	Contribution to/(from) Reserves	Current Budget <sup>(1)</sup>	Forecast Outturn Position	Budget to Date	Actual
Resources	2.1	10.1	(8.0)	12.6	22.7	3.1	62.5

The Resources directorate has a net budget of £12.6m. It is currently forecasting an outturn of £22.7m of which £8.0m of funding has been previously approved from the ICT Transformation Reserve leaving a potential directorate overspend of £2.1m.

The Resources directorate leadership team is reviewing all savings delivery across the directorate to identify mitigating actions to fully eliminate the estimated overspend.

Actual spend to date includes costs relating to Housing Benefit which will be offset by income.

Details of the areas at risk of overspending are summarised below.

(in numerical descending order)	£m	Forecast variance commentary
<b>Customer Access</b> Savings slippage	1.0	Savings slippage due to delayed implementation of the Customer Access model.
<b>Human Resources</b> Phase 2 review slippage	0.7	Savings slippage on phase 2 of the HR review.
<b>Business Support</b> Phase 2 review slippage	0.4	Phase 2 of the business support review will take place one year after the full implementation of phase 1 which is in the recruitment and implementation stage.

## Other comments

<b>Use of Reserves</b>	Approximately £8.0m will be required from the ICT Transformation reserve to fund ICT Transformation projects which were agreed by Cabinet in 2017-18.
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## Forecast outturn variance £5.2m overspend on the General Fund

£m	Forecast Outturn Variance			Annual Figures		Figures to 30 June 2019	
	Estimated impact on General Fund (GF)	Variance before reserve adjustments	Contribution to / (from) Reserves	Current Budget <sup>(1)</sup>	Forecast Outturn Position	Budget to Date	Actual
HA&C	5.2	5.2	-	139.9	145.1	35.0	26.1
Public Health	-	-	-	-	-	-	(0.7)

The Health, Adults and Community directorate forecast outturn for 2019-20 is for a £5.2m overspend once the ring-fenced nature of the Public Health grant is taken in to account. This position is driven by pressures in adult social care. The main variances are summarised below.

The 2019-20 budgets include £3.4m of savings, including £0.7m of savings from prior years. The directorate is forecasting to achieve £2.9m (84%) of these savings in 2019-20.

A recovery plan is being developed to address the pressures being faced by the directorate, which will focus on opportunities to make sustainable changes that will lead to an ongoing reduction in expenditure, as well as one-off activities that can be undertaken.

(in numerical descending order) £m

### Forecast variance commentary

**Adult Social Care & Integrated Commissioning**

An over spend due to demand for residential and community-based care services for disabled, mental health and older people.

5.5 The forecast outturn variance is a £5.5m overspend against a net budget of £139.9m.

The forecast overspend is caused by pressures in demand led residential and community based services supporting service users. These overspends are a continuation of the pressures seen and reported in the 2018-19 Outturn report. Further growth of £1.5m for homecare and £1.1m for residential/nursing care has been forecast for 2019-20, in addition to the overspends reported in last year's outturn.

Following the issues around outstanding payments to providers in relation to homecare that were reported in the 2018-19 Outturn report, a time-limited "Unpaid Invoice Hub" has been created to quickly work through the outstanding issues, including brokerage, social work and payment staff to enable a joined-up approach. This is providing a much greater level of oversight of outstanding payments, and a more rigorous regime for accruals.

Work is being undertaken to review all income streams and recharging arrangements with partner organisations to ensure activity levels are in-line with budgeted expectations, and where not, mitigating actions put in place to resolve.

A recovery plan to reduce the forecast level of over spend is being developed. This will be investigating where levels of expenditure can be reduced across a wide range of areas including homecare, transport, time-limited projects and the potential to hold vacancies across the directorate.

**Community Safety**

An underspend due to delays in police deployment of officers

(0.3) The forecast outturn variance is a £0.3m under spend against a net budget of £3.5m. This is after the allocation of an expected £0.4m funding for the Partnership Task Force.

The majority of the under spend is in relation to the general fund element of the Partnership Task Force (PTF) (£0.2m), due to delays in police deployment

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of officers.

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**Public Health**

Breakeven position with the grant forecast

- It is currently forecast that the public health grant will be fully utilised in 2019-20. Consideration is being given to how the public health grant may be further utilised to support the directorate's recovery plan e.g. more targeted prevention to help better manage demand.
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## Forecast outturn variance £0.1m underspend

£m	Forecast Outturn Variance			Annual Figures		Figures to 30 June 2019	
	Estimated impact on General Fund (GF)	Variance before reserve adjustments	Contribution to /(from) Reserves	Current Budget <sup>(1)</sup>	Forecast Outturn Position	Budget to Date	Actual
Place	(0.1)	(0.1)	-	72.9	72.8	18.2	6.5

The overall forecast variance for the Place directorate is an underspend of £0.1m. There are a number of projected underspends and overspends within the directorate that make this up. The main variances and risks are detailed below:

(in numerical descending order)	Variance £m	Forecast variance commentary
<b>Corporate Property &amp; Capital Delivery</b> Reduction in income from occupation of Jack Dash House; costs of holding vacant premises awaiting disposal; Increased staffing costs in delivering the asset management programme; Delivery of saving proposals	1.1	<p>An income pressure of £0.8m resulting from lost rents following Tower Hamlets Homes move from Jack Dash House in July 2018. This budgetary pressure will continue until a new tenant is secured.</p> <p>Costs are being incurred in relation to ensuring the security of vacant buildings whilst decisions and processes are completed around their disposals resulting in a forecast overspend of £0.2m</p> <p>Accruals totalling £0.1m for agency staff within the Asset Management team were not completed at the end of 2018/19. Timesheets were submitted to the agent but not charged back to the Council until after the deadline for inclusion in the accounts. As a result these costs will have to be met in 2019/20.</p> <p>Staff costs for asset management are forecasting to overspend by £0.6m based on current expenditure levels. This is primarily the result of the high usage of agency staff within the service. At present this is being highlighted as a risk whilst agreements are reached regarding the recharging of these costs to the HRA and capital schemes.</p>
<b>Resources</b> Reduced income at Kemnal Park Cemetery	0.2	<p>Budget pressure of £0.2m in respect of Kemnal Park Multi-Faith Cemetery as a result of demand for burial plots not meeting originally estimated levels. Marketing continues to take place to highlight the availability of plots but is not effectively increasing uptake.</p>
<b>Planning &amp; Building Control</b> Fees in relation to Planning Appeals	0.5	<p>One off legal fees and costs currently estimated at £0.5m relating to an appeal following refusal of planning application for the Westferry Printworks site.</p> <p>Current income projections for planning and building control are forecast to be in line with budget. There is a background concern Brexit will impact on income but this is not showing in planning activity at present. This will continue to be monitored throughout the year.</p>
<b>Growth &amp; Economic Development</b> Breakeven position expected	-	<p>The Growth and Economic Development restructure is due for implementation on 1 July 2019. The budget is based on the new structure and as a result any delays in implementation will result in additional cost and overspend. This will be modelled and the impact reported in future months.</p>



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outcomes to be delivered                      Mayoral Priority Growth was incorporated within the budget in 2018-19. Due to the re-profiling of projects, the funding was not fully spent. It is assumed that this £1.2 million will be made available for use in the delivery of these mayoral outcomes in 2019-20, enabling the costs to be contained within available funding streams.

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**Public Realm**  
Over achievement of parking income from bay suspensions, pay & display charges and parking enforcement

(1.5)    Parking income is projected to over achieve budgeted levels by £1.5m which will be utilised through the corporate processes for the General Fund and Parking Reserve Account in line with Section 55 requirements. Corporate decisions will be taken at year end relating to any parking surpluses

The retendering of the waste disposal contract has resulted in a reduced budget provision of £1m. This saving has been delivered and based on current tonnages the waste service is forecasting to breakeven.

In 2020-21 Waste services will be brought in-house and the costs associated with the waste mobilisation process will be met from £2.5m of corporate reserves. Current forecasts indicate the project will be delivered in line with this funding.

Additional income from Landlord Licensing and HMO (House in Multiple Occupation) is being profiled to be allocated over the life of each licence issued. Income is received up front and drawn down over the five years it is valid to cover costs incurred. No variance is forecast.

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**Housing & Regeneration**  
Slippage of savings proposal through improved utilisation of I.T.  
Over recovery of income relating to T.A. acquisitions

(0.4)    A £0.3m savings target within the Housing options lettings service will not be delivered in 2019/20. This saving is predicated on the improved utilisation of I.C.T and will slip into 2020/21 creating a budget pressure. This pressure is forecast to be partially offset through £0.1m of additional income from registered providers using the Council maintained common housing register.

Based on current activity and unit cost data, the Homelessness and Temporary Accommodation services are forecasting to underspend by £0.6m. This is predominantly the result of additional income relating to acquisitions. This forecast includes drawing down rough sleepers grant monies as it has to be repaid if not used in year. No other grant income is included in this forecast.

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Forecast breakeven position after reserves drawdown

£m	Forecast Outturn Variance			Annual Figures		Figures to 30 June 2019	
	Estimated impact on General Fund (GF)	Variance before reserve adjustments	Contribution to /(from) Reserves	Current Budget <sup>(1)</sup>	Forecast Outturn Position	Budget to Date	Actual
Governance	-	0.8	(0.8)	14.7	15.5	3.7	4.7

The Governance directorate estimated impact on the general fund is nil, subject to the expected drawdown of £0.6m transformation reserve transitional funding for Strategy, Policy and Performance (SPP) and a further estimated £0.2m from the Children’s Services Ofsted Improvement budget for strategic improvement work carried out by SPP.

The 2019-20 budgets include £0.05m of savings which the directorate is forecasting to achieve in full.

Other comments

<b>Electoral Services</b>	The European elections in May 2019 were grant funded. The costs of any by-elections would require use of identified corporate contingency funds.
<b>Registrar Services</b>	The move to St George’s Town Hall in early 2020 will provide increased income earning opportunities.
<b>Legal Services</b>	The use of external legal services is being reviewed to reduce costs. The Council has joined a framework for barristers and is looking into joining a framework for solicitors.
<b>Communications</b>	The communications division is reviewing the potential for street advertising income.

## Forecast outturn variance of £10.5m underspend

£m	Forecast Outturn Variance			Annual Figures		Figures to 30 June 2019	
	Estimated impact on General Fund (GF)	Variance before reserve adjustments	Contribution to /(from) Reserves	Current Budget <sup>(1)</sup>	Forecast Outturn Position	Budget to Date	Actual
Corporate and financing costs	(10.5)	(10.5)	-	2.8	(7.7)	0.7	2.9

The corporate and financing costs area is forecasting an underspend of £10.5m. This is demonstrated by the centrally held non-recurrent social care support grant, non-pay inflation budget and corporate contingency.

Details of the variances are summarised below:

(in numerical descending order)	£m	Forecast variance commentary
<b>Social Care Support Grant</b> Grant to support adult and children's social care	(4.0)	The non-recurrent social care grant to support both adult and children's social care is held centrally, pending agreement of allocation to social care support areas.
<b>Non-pay inflation</b> Budget for contractual inflation in directorates	(3.4)	The budget for contractual (non-staffing) inflation is held centrally, pending the evidencing of pressures by directorates.
<b>Corporate contingency</b> Budget to cover unforeseen circumstances	(3.1)	The centrally held budget (£3.1m) is forecast to help offset current overspend pressures across the Council.

## Forecast outturn variance for HRA £2.2m underspend

£m	Forecast Outturn Variance			Annual Figures		Figures to 30 June 2019	
	Contribution to / (from) HRA	Contribution to / (from) Reserves	Outturn Variance before Adjustments	Revised Budget	Forecast Outturn Position	Budget to Date	Actual
HRA	2.2	-	(2.2)	36.7	34.5	(19.8)	(32.3)

The overall forecast for the Housing Revenue Account is a £2.2m underspend. The main component of this is from £1.6m additional dwelling rent income above budget.

(in numerical descending order)	Variance £m	Forecast variance commentary
<b>Dwelling rent income</b>	(1.6)	Rental income is currently forecast to be higher than budget due to lower void rates than assumed when this budget was set, along with a lower level of Right to Buy sales.
<b>Additional income recovered</b>		
<b>Other Issues</b>		
<b>Capital Financing charges</b>	(0.6)	The 2019/20 budget assumes that there will be a large Revenue Contribution to Capital Outlay (RCCO) made from HRA revenue resources to finance the 2019/20 HRA capital programme. If all this budget is not required to fund the HRA capital programme in 2019/20 then the resulting underspend will carry forward in HRA balances and be earmarked to fund capital in future years.
<b>Tower Hamlets Homes (THH) Delegated: Special Services, Rents, Rates &amp; Taxes/ Supervision &amp; Management/ Repairs &amp; Maintenance</b>		Although small net variances are currently being projected on the delegated budgets managed by Tower Hamlets Homes, some large demand led services are managed within this area, including the Repairs and Maintenance budget outlined above. These budgets are closely monitored in order that demand pressures are identified and financial implications addressed.

## Capital expenditure:

	Spent to date vs Budget		2019-20 (£m)	
	This year (Q1)	Last year (Q1)	Annual budget	Spent to date
	% B = F/E	% C	£m E	£m F
Housing Revenue Account	5%	2%	112.1	6.0
Corporate	0%	-1%	50.4	-
Children's Services	8%	24%	43.8	3.5
Place	37%	36%	78.6	29.4
Health, Adult, Communities	-3%	0%	13.5	(0.45)
Resources	2%	0%	2.3	0.1
<b>Total</b>	<b>13%</b>	<b>14%</b>	<b>300.6</b>	<b>38.5</b>

We have spent 13% of budget as at quarter 1, compared to 14% at quarter 1 last year.

## Capital receipts from sale of Housing and General Fund assets

## Capital receipts:

	This year
	£m
<b>Dwellings sold under Right to Buy (RTB)</b>	
Receipts from RTB sales	1.6
Less: poolable amount paid to DCLG	(0.4)
<b>Sale of other HRA assets</b>	
Preserved Right to Buy receipts	0.4
20 Alton Street	0.4
<b>Sale of General Fund assets</b>	
	-
	-
<b>Total</b>	<b>2.0</b>

Receipts shown gross before costs of sale are deducted

**Current projections will :**

This table shows the balance on the general fund, HRA and useable reserves held for the previous 2 years as well as showing the projected impact on reserves for 2019-20.

**Reduce our General Fund Reserve by £8.2m****Increase our HRA by £2.2m****Reduce our Earmarked Reserves by £9.4m**

	Balance at 31 March 2018	Balance at 31 March 2019	Contribution (to) / from Reserve	Projected Balance 31 March 2020
	£m	£m	£m	£m
General Fund Reserve	33.3	27.0	8.2	18.8
Housing Revenue Account (HRA)	47.6	54.6	(2.2)	56.8
Earmarked Reserves	141.9	140.3	9.4	130.9
<b>Total Usable Reserves</b>	<b>222.8</b>	<b>221.9</b>	<b>15.4</b>	<b>206.5</b>

	Balance at 31 March 2018	Balance at 31 March 2019	Contribution (to) / from Reserve	Projected Balance 31 March 2020
£m	£m	£m	£m	£m
<b>Earmarked reserves consist of</b>				
Transformation	15.0	8.4	1.4	7.0
ICT / Finance Systems	21.0	16.3	8.0	8.3
Other	0.9	0.9		0.9
Parking Control	3.3	3.3		3.3
Building Control	0.2	0.2		0.2
Land Charges	0.7	0.7		0.7
Insurance	21.2	21.2		21.2
Public Health Grant	1.3	1.7		1.7
Schools Balances	23.4	23.4		23.4
New Civic Centre	17.2	17.2		17.2
New Homes Bonus	12.1	28.9		28.9
Free School Meals	4.0	4.0		4.0
Mayor's Investment Priorities	7.0	4.6		4.6
Risk Reserve	8.8	4.4		4.4
Revenue Grants	1.7	1.7		1.7
Mayor's Tackling Poverty Reserve	4.1	3.4		3.4
<b>Totals</b>	<b>141.9</b>	<b>140.3</b>	<b>9.4</b>	<b>130.9</b>

Target for year £25.1m

£m	Saving Target	19-20 Target	Prior Year Slippage	Forecast Savings	Slippage	Under Recovery	Over recovery
	A = B + C	B	C	(D = E + F + G) = A	E	F	G
				✓	✗	✗	✓
Children and Culture	5.1	3.5	1.6	0.8	1.0	3.3	-
HA&C	3.4	2.7	0.7	2.9	0.5	-	-
Place	2.9	2.4	0.5	2.5	0.3	0.1	-
Governance	0.1	0.1	-	0.1	-	-	-
Resources	2.8	0.5	2.3	2.1	0.7	-	-
All	10.8	5.6	5.2	8.9	1.9	-	-
<b>Total</b>	<b>25.1</b>	<b>14.8</b>	<b>10.3</b>	<b>17.3</b>	<b>4.4</b>	<b>3.4</b>	<b>-</b>

tick: a higher level of confidence that savings are on track to be delivered.

cross: either timing issues, i.e. slippage into future years, or at risk of non-delivery.

Total savings target for 2019-20 is £25.1m (£14.8m relates to approved savings as part of the 2019-20 budget setting process, and £10.3m as a result of previous year savings not delivered)

- £17.3m is identified as being on track to deliver savings;
- A net position of £4.4m is forecast to slip into future years due to timing issues;
- £3.4m has been identified as unachievable; this is mainly in the Children and Culture areas of Early Years and Special Educational Needs & Disabilities (SEND).

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<b>Capital Control Budget 2019-20</b>	<b>Total</b>	<b>Health, Adults &amp; Community</b>	<b>Children &amp; Culture</b>	<b>Place</b>	<b>Resources</b>	<b>Corporate</b>	<b>Housing Revenue Account</b>
	£	£	£	£	£	£	£
<b>Original Budget (Council, February 2019)</b>	<b>261,057,283</b>	<b>11,997,589</b>	<b>35,444,430</b>	<b>63,463,309</b>	<b>1,888,000</b>	<b>63,324,000</b>	<b>84,939,955</b>
<b>Slippage from 2018-19</b>	<b>16,419,159</b>	<b>1,369,011</b>	<b>4,914,929</b>	<b>(15,488,617)</b>	<b>384,134</b>	<b>(2,007,270)</b>	<b>27,246,972</b>
<b>Cabinet Approvals</b>							
Condition & Improvement Works in Schools (June 2019)	3,000,000		3,000,000				
Gascoigne Greening Project - Culture (June 2019)	301,000		301,000				
Building Fabric Works for Various Sites - Investment works to LBTH Assets (June 2019)	931,000			931,000			
Mechanical and Electrical Works for Various Sites - Investment works to LBTH Assets (June 2019)	1,305,000			1,305,000			
Interim Depot Provision - Public Realm Improvements (June 2019)	615,000			615,000			
Waste and Cleansing IT Systems - Public Realm Improvements (June 2019)	750,000			750,000			
<b>Budgets Re-profiled</b>							
Underground Refuse Service Vehicles	25,086					25,086	
Purchase of properties for use as Temporary Accommodation and purchase of s106 properties	26,910,000			26,910,000			
<b>Other Adjustments</b>							
William Cotton Place - Fit Out - Public Health (adjustment to slippage from 2018-19)	104,633	104,633					
Arnhem Wharf - Expansion (adjustment to slippage from 2018-19)	13,700		13,700				
Bow School - Expansion (adjustment to slippage from 2018-19)	12,256		12,256				
George Green's - 6th form Expansion (adjustment to slippage from 2018-19)	20,830		20,830				
Woolmore Primary School Expansion (adjustment to slippage from 2018-19)	19,823		19,823				
Provision for 2 year olds	(500,000)		(500,000)				
- Children's House Nursery School - Additional Accommodation	500,000		500,000				
Schools Urgent Works - Conditions and Improvement	(485,235)		(485,235)				
- Beatrice Tate - Replace Default Pipework	23,128		23,128				
- Cyril Jackson (North) - Replace Boiler and Calorifier	39,033		39,033				
- George Green's - Hygiene Room	1,080		1,080				
- Halley - Intruder Alarm & Fire Alarm Upgrade	11,000		11,000				
- Halley - Toilet Refurbishment	2,427		2,427				
- Ian Mikardo High Special Needs School - Roofing	188		188				
- Seven Mills - Hygiene Room	15,000		15,000				
- Seven Mills - Roof Phase 1	(45,000)		(45,000)				
- Seven Mills - Roof Phase 2	300,000		300,000				
- Shapla - Replace H&C controls	116,480		116,480				
- Smithy Street- Fire Door Works	20,000		20,000				
- Smithy Street School - Lead Pipework Replacement	1,901		1,901				
Improve the look and feel of Tower Hill Terrace - Culture (adjustment to slippage from 2018-19)	9,732		9,732				
Langdon Park BMX - Culture (adjustment to slippage from 2018-19)	33,464		33,464				
Mile End Stadium Astro-turf Development - Culture (adjustment to slippage from 2018-19)	6,208		6,208				
Victoria Park - Pools Playground Improvement - Culture (adjustment to slippage from 2018-19)	9,348		9,348				
Christ Church Gardens - Parks (adjustment to slippage from 2018-19)	(1,125)		(1,125)				
King Edward Memorial Park - Parks (adjustment to slippage from 2018-19)	(1,665)		(1,665)				
Millwall Park & Langdon Park - Parks (adjustment to slippage from 2018-19)	2,400		2,400				
The Oval Space - Parks (adjustment to slippage from 2018-19)	3,933		3,933				
Victoria Park Sports Hub - Parks (adjustment to slippage from 2018-19)	2,482		2,482				
Asset Maximisation	194,586			194,586			
- Artichoke Pub Site	4,400			4,400			
- Harpley School - Additional Accommodation	6,014			6,014			
- Berner Centre Demolition	(217,000)			(217,000)			
- PDC Bethnal Green - Local presence	12,000			12,000			
Tree planting - Isle of Dogs - Public Realm Improvements (adjustment to slippage from 2018-19)	(12,342)			(12,342)			
TfL Schemes	(564,401)			(564,401)			
- Ben Johnson Neighbourhood	100,000			100,000			
- Bus Stop Accessibility Programme	6,920			6,920			
- Chrisp St Corridor	100,000			100,000			
- Cycle Strategy 2017	100,000			100,000			
- Housing Zone - Complementary Measures	503			503			
- Improving Air Quality	50,000			50,000			
- Legible London 2017	50,000			50,000			
- Local Accessibility	15,000			15,000			
- Motor Cycle Parking	10,000			10,000			
- Motor Cycles in Bus Lanes	10,990			10,990			
- Quietway 6: Bancroft Road / Warley Street	6,050			6,050			
- Quietway 6: Holton Street / Grantley Street	294			294			
- Quietway 6: Old Ford Road / Armagh Road	59,546			59,546			
- Quietway 6: Roman Road / Cardigan Road / Arbery Road	98			98			
- Sustainable Drainage Scheme	15,000			15,000			
- Tackling ASB Driving	40,000			40,000			
Bethnal Green Town Centre - TfL Schemes (adjustment to slippage from 2018-19)	(3,003)			(3,003)			
Boroughwide Road Safety - TfL Schemes (adjustment to slippage from 2018-19)	6,720			6,720			
Road Safety 2017 - TfL Schemes (adjustment to slippage from 2018-19)	107,298			107,298			
TfL Local Transport - Various - TfL Schemes (adjustment to slippage from 2018-19)	(11,990)			(11,990)			
Bus Improvement - 21 Wapping Lane - Transport S106 Funded Schemes (adjustment to slippage from 2018-19)	21,292			21,292			
Limehouse Cut / St Annes Row - Transport S106 Funded Schemes (adjustment to slippage from 2018-19)	(3,000)			(3,000)			
Provision for New Schemes	(10,986,000)					(10,986,000)	
1-4-1 Leaseholder Buybacks (adjustment to slippage from 2018-19)	(59,396)						(59,396)
Short Life Properties (adjustment to slippage from 2018-19)	15,792						15,792
<b>Quarter 1 Total Adjustments</b>	<b>23,148,476</b>	<b>104,633</b>	<b>3,432,385</b>	<b>30,615,976</b>	<b>-</b>	<b>(10,960,914)</b>	<b>(43,604)</b>
<b>Revised 2019-20 Budget</b>	<b>306,685,759</b>	<b>12,102,222</b>	<b>43,791,745</b>	<b>78,590,668</b>	<b>2,272,134</b>	<b>50,355,816</b>	<b>112,143,322</b>

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# CONTROL BUDGET 2019-20

	Total General Fund	Health, Adults & Community	Children's Services	Place	Governance	Resources	Corporate Costs and Central Financing
Gross Expenditure Budget	825,397,342	170,574,338	153,824,619	181,385,602	23,011,988	282,802,146	13,798,649
Gross Income Budget	(482,837,038)	(30,639,665)	(54,145,545)	(108,489,017)	(8,314,523)	(270,265,288)	(10,983,000)
<b>Nex Expenditure Budget</b>	<b>342,560,304</b>	<b>139,934,673</b>	<b>99,679,074</b>	<b>72,896,585</b>	<b>14,697,465</b>	<b>12,536,858</b>	<b>2,815,649</b>
Growth Reallocation - PFI Enforcement Officer	0		(85,000)			85,000	
<b>Total Adjustments</b>	<b>0</b>	<b>0</b>	<b>(85,000)</b>	<b>0</b>	<b>0</b>	<b>85,000</b>	<b>0</b>
<b>Revised Net Expenditure Budget</b>	<b>342,560,304</b>	<b>139,934,673</b>	<b>99,594,074</b>	<b>72,896,585</b>	<b>14,697,465</b>	<b>12,621,858</b>	<b>2,815,649</b>

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MTFS Savings Tracker 2019-22 as at 30 June 2019 - Summary

2019-20						
Savings target	Slippage from previous year	Revised Savings target	Delivered / cashed	Forecast savings	Variance - Slippage	Variance - Under / (over) delivery
£'000	£'000	£'000	£'000	£'000	£'000	£'000

2020-21					
Savings target	Slippage from previous year	Revised Savings target	Forecast savings	Variance - Slippage	Variance - Under / (over) delivery
£'000	£'000	£'000	£'000	£'000	£'000

2021-22					
Savings target	Slippage from previous year	Revised Savings target	Forecast savings	Variance - Slippage	Variance - Under / (over) delivery
£'000	£'000	£'000	£'000	£'000	£'000

Directorate

Health, Adults & Community	2,752	679	3,431	<b>703</b>	2,870	561	-
Children and Culture	3,483	1,590	5,073	<b>450</b>	725	1,000	3,348
Place	2,416	490	2,906	<b>1,351</b>	2,556	300	50
Governance	50	-	50	<b>50</b>	50	-	-
Resources	525	2,250	2,775	-	2,075	700	-
Cross-Directorate	5,619	5,248	10,867	<b>258</b>	8,917	1,950	-

	1,190	561	1,751	<b>1,751</b>	-	-	-
	1,500	1,000	2,500	<b>2,250</b>	250	-	-
	3,380	300	3,680	<b>3,680</b>	-	-	-
	-	-	-	-	-	-	-
	2,770	700	3,470	<b>3,470</b>	-	-	-
	5,750	1,950	7,700	<b>7,700</b>	-	-	-

	1,700	-	1,700	<b>1,700</b>	-	-	-
	300	250	550	<b>550</b>	-	-	-
	329	-	329	<b>329</b>	-	-	-
	-	-	-	-	-	-	-
	200	-	200	<b>200</b>	-	-	-
	5,630	-	5,630	<b>5,630</b>	-	-	-

<b>Total</b>	<b>14,845</b>	<b>10,257</b>	<b>25,102</b>	<b>2,812</b>	<b>17,193</b>	<b>4,511</b>	<b>3,398</b>
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<b>Total</b>	<b>14,590</b>	<b>4,511</b>	<b>19,101</b>	<b>18,851</b>	<b>250</b>	<b>-</b>	<b>-</b>
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<b>Total</b>	<b>8,159</b>	<b>250</b>	<b>8,409</b>	<b>8,409</b>	<b>-</b>	<b>-</b>	<b>-</b>
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Savings Achievement Status

Savings Delivered / On Target	6,067	319	6,386	<b>2,461</b>	6,386	-	-
Savings Slipping but Achievable	6,959	8,359	15,318	<b>351</b>	10,807	4,511	-
Not Deliverable / Not Achievable	1,819	1,579	3,398	-	-	-	3,398

	14,590	-	14,590	<b>14,590</b>	-	-	-
	-	4,511	4,511	<b>4,261</b>	250	-	-
	-	-	-	-	-	-	-

	8,159	-	8,159	<b>8,159</b>	-	-	-
	-	250	250	<b>250</b>	-	-	-
	-	-	-	-	-	-	-

<b>Total</b>	<b>14,845</b>	<b>10,257</b>	<b>25,102</b>	<b>2,812</b>	<b>17,193</b>	<b>4,511</b>	<b>3,398</b>
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<b>Total</b>	<b>14,590</b>	<b>4,511</b>	<b>19,101</b>	<b>18,851</b>	<b>250</b>	<b>-</b>	<b>-</b>
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<b>Total</b>	<b>8,159</b>	<b>250</b>	<b>8,409</b>	<b>8,409</b>	<b>-</b>	<b>-</b>	<b>-</b>
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Mayoral Priority Growth 2019-22 as at 30 June 2019

Reference	Directorate	Title	Strategic Priority Outcome	Revenue (One Off)				Revenue (Ongoing)				Capital				Housing Revenue Account				Status update	
				2019-20 £'000	2020-21 £'000	2021-22 £'000	Total £'000	2019-20 £'000	2020-21 £'000	2021-22 £'000	Total £'000	2019-20 £'000	2020-21 £'000	2021-22 £'000	Total £'000	2019-20 £'000	2020-21 £'000	2021-22 £'000	Total £'000		
MGRO CHI 2-17	Children's Services	Children's Centre commissioning of voluntary and community sector (VCS) organisations	2. Children and young people are protected so they can realise their potential	120			120														Outreach service provided by the Voluntary Sector for 'hard to reach' families, including the summer programme.
MPG / ALL 002 / 19-20 (b)	Children's Services	Community Safety, Violence, Exploitation and Serious Organised Crime	7. People live in safer neighbourhoods and anti-social behaviour is tackled					182	4	4	190										
MPG/ CHI 03 / 18-19	Children's Services	Continuing to provide universal free school meals	2. Children and young people are protected so they can realise their potential	2,000	2,000		4,000														£2m for free school meals for primary schools.
MPG/ CHI 001 / 19-20	Children's Services	Early Years - Conception to Age 13	4. Inequality is reduced and people feel that they fairly share the benefits from growth					1,000			1,000										
MPG/ CHI 02 / 18-19	Children's Services	Early Years Provision Victoria Park and St Hilda's Community Centre	2. Children and young people are protected so they can realise their potential	31	31		62														
MGRO CLC 5-17	Children's Services	Provision of four new outdoor gyms to improve health outcomes to all parts of the community	3. People access joined-up services when they need them and feel healthier and more independent									27									
<b>Children's Services Total</b>				<b>2,151</b>	<b>2,031</b>	<b>-</b>	<b>4,182</b>	<b>1,182</b>	<b>4</b>	<b>4</b>	<b>1,190</b>	<b>27</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>27</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	
MPG/ HAC 02 / 18-19	Health, Adults and Community	Additional Police officers for Neighbourhoods	7. People live in safer neighbourhoods and anti-social behaviour is tackled	800	800		1,600														The Metropolitan Police Service is recruiting extra police officers to work directly in response to residents' concerns around community safety. This is a partnership initiative between the Council and Tower Hamlets Police, and replaces the previous partnership taskforce (PTF) agreements.
MPG/ PLA 06 / 18-19	Health, Adults and Community	ASB & Crime Neighbourhood Management	7. People live in safer neighbourhoods and anti-social behaviour is tackled	200	200		400														
MPG / ALL 001 / 19-20	Health, Adults and Community	Community Safety - Enforcement Review	7. People live in safer neighbourhoods and anti-social behaviour is tackled					121			121										
MPG/ HAC 04 / 18-19	Health, Adults and Community	Community Safety, ASB & Crime	7. People live in safer neighbourhoods and anti-social behaviour is tackled	273	277		550														All the new posts are now employed against, and the cost of the new IT system was less than initially estimated.
MPG / ALL 003 / 19-20	Health, Adults and Community	Community Safety, Violence, Exploitation and Serious Organised Crime	7. People live in safer neighbourhoods and anti-social behaviour is tackled								113										
<b>Health, Adult &amp; Community Total</b>				<b>1,273</b>	<b>1,277</b>	<b>-</b>	<b>2,550</b>	<b>121</b>	<b>-</b>	<b>113</b>	<b>234</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	
MPG / PLA 04 / 18-19	Place	Air Quality Assistant	5. People live in a borough that is clean and green	50	50		100														
MPG/ PLA 05 / 18-19	Place	Bursary for Environmental Health Trainees	5. People live in a borough that is clean and green	30	30		60														
MPG / ALL 001 / 19-20	Place	Community Safety - Enforcement Review	7. People live in safer neighbourhoods and anti-social behaviour is tackled					451			451										
MGRO D&R 1-17	Place	Creating community hubs and regularising the usage of community buildings to provide high quality, low cost space for community groups	10. The Council works collaboratively across boundaries in strong and effective partnerships to achieve the best outcomes for residents									1,581			1,581						
MPG/ PLA 01 / 18-19	Place	Enabling Unemployed Parents to Move into Childcare Jobs	1. People access a range of education, training, and employment opportunities	451	451		902														
MGRO D&R 2-17	Place	Enhancing services to support people in overcoming the barriers to accessing skills and toward employment	1. People access a range of education, training, and employment opportunities	226			226														
MGRO D&R 6-17	Place	Helping women to progress from unemployment into health care careers.	1. People access a range of education, training, and employment opportunities	705			705														
HRA Budget report	Place	HRA funding set aside for ASB Initiatives	7. People live in safer neighbourhoods and anti-social behaviour is tackled													736				736	Police officers funded by the HRA, and match funding by MOPAC to provide additional police officers (free of charge).
MGRO CLC 3-17	Place	Improving Air quality in Tower Hamlets	5. People live in a borough that is clean and green									26			26						
MGRO CLC 4-17	Place	Incentivising better waste collection arrangements on housing estates	5. People live in a borough that is clean and green	250			250														Links to 2 year plan for the estates recycling, communications and interventions projects.
MGRO D&R 3-17	Place	Introducing new off-street parking arrangements in our housing estates due to changes in national legislation	5. People live in a borough that is clean and green	(80)			(80)					1,478	1,450	326	3,254	(250)				(250)	

Reference	Directorate	Title	Strategic Priority Outcome	Revenue (One Off)				Revenue (Ongoing)				Capital				Housing Revenue Account				Status update		
				2019-20 £'000	2020-21 £'000	2021-22 £'000	Total £'000	2019-20 £'000	2020-21 £'000	2021-22 £'000	Total £'000	2019-20 £'000	2020-21 £'000	2021-22 £'000	Total £'000	2019-20 £'000	2020-21 £'000	2021-22 £'000	Total £'000			
MPG / PLA 001 / 19-20	Place	Invest in Graffiti Removal	5. People live in a borough that is clean and green	450	450		900															
MGRO CLC 17	Place	Investing in public realm to improve the local environment for residents	5. People live in a borough that is clean and green				-						2,401	1,000	1,000	4,401						
MPG / PLA 002 / 19-20	Place	Regeneration Vision	6. People live in good quality and affordable homes and neighbourhoods	400	200		600															
MGRO D&R 5-17	Place	Supporting residents aged 50 and above through training and support to help them access employment opportunities	1. People access a range of education, training, and employment opportunities	101			101															
MGRO D&R 4-17	Place	Supporting young people realise their potential through the Mayor's Apprenticeship Fund	1. People access a range of education, training, and employment opportunities	199	104		303															Target delivery of creating 1000 apprenticeship opportunities by 2020 is on course.
MGRO RES 2-17	Place	Tackling Poverty Fund - Tackling poverty in Tower Hamlets by creating a Welfare Support Scheme to support residents	3. People access joined-up services when they need them and feel healthier and more independent	1,667	1,667		3,334															Ongoing tackling poverty initiatives.
MPG / PLA 003 / 19-20	Place	Tackling Poverty Programme	4. Inequality is reduced and people feel that they fairly share the benefits from growth				-			700	700											
MPG/ PLA 02 /18-19	Place	Watney Market Shop Front for 'Young WorkPath'	2. Children and young people are protected so they can realise their potential	60	60		120						16			16						
<b>Place Total</b>				<b>4,508</b>	<b>3,012</b>	<b>-</b>	<b>7,520</b>	<b>451</b>	<b>-</b>	<b>700</b>	<b>1,151</b>	<b>5,502</b>	<b>2,450</b>	<b>1,326</b>	<b>9,278</b>	<b>486</b>	<b>-</b>	<b>-</b>	<b>486</b>			
MGRO RES 1-17	Resources	Providing free Wi-Fi in Tower Hamlets for all	9. The Council is open and transparent putting residents at the heart of everything we do				-					500	500	500	1,500							
<b>Resources Total</b>				<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>500</b>	<b>500</b>	<b>500</b>	<b>1,500</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>			
<b>Total</b>				<b>7,932</b>	<b>6,320</b>	<b>-</b>	<b>14,252</b>	<b>1,754</b>	<b>4</b>	<b>817</b>	<b>2,575</b>	<b>6,029</b>	<b>2,950</b>	<b>1,826</b>	<b>10,805</b>	<b>486</b>	<b>-</b>	<b>-</b>	<b>486</b>			

20200682

**New Pipeline Schemes for Cabinet Approval - 31 July 2019**


Scheme	Summary	Strategic Priority Outcome	Directorate	2019-20 Budget £m	2020-21 Budget £m	2021-22 Budget £m	2022-23 Budget	Total Budget £m
<b>New Approvals:</b>								
Roman Road West Regeneration	<p>The purpose of this Project is to seek approval for capital funding to deliver the Roman Road West (RRW) Regeneration programme, which aims to address weaknesses and improve the competitiveness and performance of this key local town centre.</p> <p>The RRW Regeneration programme addresses weaknesses in this town centre, particularly very low footfall, by carrying out improvements to: the public realm and Market Square to relaunch the market, wayfinding &amp; signage, planters on the high street, shopfronts, equipment for commercial waste &amp; recycling, converting lock-ups into workspace and create a new walking route from Queen Mary University London (QMUL) campus in Mile End to RRW.</p>	6. People live in good quality and affordable homes and neighbourhoods	Place	0.705	0.830	0.141		1.676
Local Infrastructure Initiatives (LIF)	<p>This PID sets out the Local Infrastructure Interventions Programme approach for the management and expenditure of Local Infrastructure Fund</p> <p>The PID seeks approval for the allocation of LIF funds to the value of £10.2m to two sub – programmes that will deliver the outputs of the LIF programme:</p> <p>The PID seeks approval for the allocation of LIF funds to the value of £10.2m to two sub – programmes that will deliver the outputs of the LIF programme:</p> <ul style="list-style-type: none"> <li>• Delivery of Public Nominated Projects (£7.7m)</li> <li>• Enabling Delivery of Housing and Infrastructure (£2.4 m)</li> </ul>	9. The Council is open and transparent putting residents at the heart of everything we do	Place	1.900	4.500	3.700		10.100
Middlesex Street Regeneration Programme	<p>This scheme is to secure approval for capital funding to deliver the Middlesex Street High Street Regeneration programme, which aims to improve the competitiveness and performance of this key local high street.</p> <p>The Middlesex Street Regeneration programme will address weaknesses and complete improvements to: public realm, shopfronts, Petticoat Lane Street Markets, signage &amp; wayfinding, commercial waste management &amp; recycling facilities and equipment and bring Leyden Street toilet block back into use as a public convenience and workspace to generate income for the council.</p>	5. People live in a borough that is clean and green	Place	0.403	0.985	0.985	0.327	2.700
Early Learning for 2 Year Olds Capital Funding 2018-20	<p>The Early Learning for 2 Year Olds (EL2) Capital Funding 2018-20 programme is an allocation of £1.9 million of capital funding to create 600 new Early Learning for 2 Year Olds (EL2) early education places to benefit some of the most disadvantaged families with 2 year olds in the country.</p> <p>The programme also enables the London Borough of Tower Hamlets to fulfil a significant part of its statutory duty under the Childcare Act 2006 to ensure the sufficiency of early education and affordable childcare and to maximise the take-up of the Free Early Education Entitlements.</p>	1. People access a range of education, training, and employment opportunities	Children and Culture	1.000	0.900			1.900

Scheme	Summary	Strategic Priority Outcome	Directorate	2019-20 Budget £m	2020-21 Budget £m	2021-22 Budget £m	2022-23 Budget	Total Budget £m
<b>New Approvals:</b>								
ICT End User Computing (EUC) Transformation Project	<p>This project aims to facilitate improvements to efficiency, collaboration, engagement, user-experience and mobility by providing improved end-user computing platforms.</p> <p>The deliverables associated with this PID delivers the EUC Devices workstream. This workstream's objectives are to:</p> <ul style="list-style-type: none"> <li>• Evaluate and analyse requirements</li> <li>• Quantify the device requirement</li> <li>• Specify hardware devices</li> <li>• Procure the specified devices</li> <li>• Deliver the procured devices to the desktop</li> <li>• Test and set in motion the ongoing support of the devices</li> </ul>	11. The Council continuously seeks innovation and strives for excellence to embed a culture of sustainable improvement	Resources	4.200				4.200
<b>Total</b>				<b>8.208</b>	<b>7.215</b>	<b>4.826</b>	<b>0.327</b>	<b>20.576</b>

Existing Capital Schemes Additional Funding for Cabinet Approval - 31 July 2019

Scheme	Summary	Strategic Priority Outcome	Directorate	2019-20 Budget £m	2020-21 Budget £m	2021-22 Budget £m	2022-23 Budget £m	2023-24 Budget £m	Total Budget £m
<b>Additional funding:</b>									
Carbon Offsetting Programme	This Scheme delivers Carbon Offsetting via finances secured through S106 which include: • Affordable Warmth Programme • Schools Energy Retrofit Project • Community Tree Planting Project • Bio-Solar Installation Project • SME Carbon Reduction Project • Community Energy Efficiency projects • Residential Boiler Replacement Programme	2.1 People live in a borough that is clean and green	Place	0.740	0.700	0.300			1.740
Inclusive Play	This scheme provides for with inclusive play opportunities for children with disabilities. We propose to reanimate a number of run down playgrounds in key areas of the borough. The final identification of sites will be subject to analysis of the most recent play equipment inspection in the borough, and will present opportunities to create inclusive play in areas where the borough has little or no inclusive play equipment: Potential sites will be in heavily used areas and cater for children for disabilities as well as able bodied children.	2. Children and young people are protected so they can realise their potential	Children and Culture	0.538	0.300	0.250			1.088
Improvements to Sports Facilities in Parks	As part of the drive to enable affordable and accessible sport / leisure provision for local residents, this programme is to improve sports facilities in parks, such as tennis courts, and multi-use games areas (MUGA's). The programme will include establishing and enhancing some outdoor gyms building on the successful programme from 2017-18. Over the coming years, £1,000,000 will be spent, linking when possible to improvements to playgrounds and park infrastructure.	8. People feel they are part of a cohesive and vibrant community	Children and Culture	0.155	0.240	0.350	0.180		0.925
South Dock Bridge	This scheme sets out the delivery of South Dock Bridge a new footbridge between South Quay and Canary Wharf in the Isle of Dogs. Approval is sought for £15m to deliver the bridge and the associated landscaping works (part of this funding has already been sourced as set out in section 9).  The South Dock Bridge Project builds on the work undertaken by an earlier feasibility study into a new pedestrian and cycling link across South Dock (Isle of Dogs – South Dock Bridges Feasibility Study, May 2016).	6. People live in good quality and affordable homes and neighbourhoods	Place	0.110	6.760	6.760			13.630
Aberfeldy Health Centre (Exception/Change Report)	This change note has been developed to reflect the following changes to the programme of works: 1. Poplar Harca are in the process of taking over the freeholder arrangements and will take over the head lease arrangements, replacing NHS Property Services. 2. The East London Foundation Trust is taking over responsibility of fitting out the premises, replacing NHS Property Services. 3. Due to delays with the programme, the change note reflects more accurate timescales for delivery. 4. Revised project costs	3. People access joined-up services when they need them and feel healthier and more independent	Health, Adults & Community			0.749			0.749
Brick Lane Regeneration (Exception/Change Report)	On the 19th December 2017, Cabinet approved Phase 2 of the Brick Lane regeneration Scheme. Due to an oversight, this budget increase was not subsequently included in the overall Councils capital programme. We have been informed that in order to reflect this decision in the capital programme, a change control form must be submitted to the Asset Management and Capital Delivery Working Group.	6. People live in good quality and affordable homes and neighbourhoods	Place	0.157					0.157
Phoenix School Expansion - Using Bow Boys Site (Exception/Change Report)	The sum of £9.1 M included in the programme which was to use the ex Bow Boy's School Site to create a 3 forms entry primary school. Following review of the demand for primary school places, the need for primary school places in the Bow area meant that the 3fe school was no longer required. The new proposal to use the site to create an upper school for Phoenix special school will cost £16m.	2. Children and young people are protected so they can realise their potential	Children and Culture	10.700	3.900	1.600			16.200
Accelerated Street Lighting and LED Replacement Programme (Exception/Change Report)	The Mayor for Tower Hamlets in support of his 'Love your Neighbourhood' initiative and a number of manifesto commitments, has already made a commitment and invested £1m per annum over a period of 4 years. The aim of this project is to accelerate this programme from 2019/20 onwards to £5m per annum from 2019/22, totalling £21m over the programme period, and includes £1.5m in 2019/20 for the implementation of a full Central Management System (CMS) on the circa 10,600 lanterns in the borough.	5. People live in a borough that is clean and green	Place		2.059	5.000			7.059
Community Hubs/Buildings	The scheme costs have exceeded the budget allocation of £3,145,000. Cabinet Members originally provided the allocation in November 2016 and issued a revised Capital Programme Report Appendix 9 in January 2018. The allocation of £3,145,000 was to source the Community Hub Programme. The allocations would have been based on estimated figures as the full extent of the projects would have been unknown at that time.	3. People access joined-up services when they need them and feel healthier and more independent	Place	1.498	0.304				1.802
Disabled Facilities Grant	Tower Hamlets have been offered and accepted an additional amount of £297,848 from the Ministry of Housing, Communities and Local Government as an additional Disabled Facilities Grant. There are various constraints but generally the additional grant is more flexible than the regular grant.  The funds must be committed and work in completion by the end of March 2019.  Projects that can be delivered by 31st March are works at Bethnal Green Library and works to toilet blocks at Mile End Pavilion and Bromley by Bow Centre.  At the Budget 2018 the Chancellor announced an additional £55 million capital funding for the Disabled Facility Grant (DFG). The amount has been distributed to all Local Authorities, and each Authority must be able to spend all or most of their allocation by 31st March 2019.	6. People live in good quality and affordable homes and neighbourhoods	Place	0.298	-	-	1.500	1.500	3.298
<b>Total</b>				<b>14.196</b>	<b>14.264</b>	<b>15.009</b>	<b>1.680</b>	<b>1.500</b>	<b>46.649</b>

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<p><b>Cabinet</b></p> <p>31 July 2019</p>	
<p><b>Report of:</b> Neville Murton, Corporate Director of Resources</p>	<p><b>Classification:</b> Unrestricted</p>
<p><b>Medium Term Financial Strategy Refresh and 2020-21 Budget Planning</b></p>	

<b>Lead Member</b>	<b>Councillor Ronald, Cabinet Member for Resources and the Voluntary Sector</b>
<b>Originating Officer(s)</b>	Kevin Bartle (Divisional Director, Finance Procurement and Audit)
<b>Wards affected</b>	All wards
<b>Key Decision?</b>	No
<b>Forward Plan Notice Published</b>	20/06/2019
<b>Reason for Key Decision</b>	N/A
<b>Strategic Plan Priority / Outcome</b>	<p><b>1. People are aspirational, independent and have equal access to opportunities;</b></p> <p><b>2. A borough that our residents are proud of and love to live in;</b></p> <p><b>3. A dynamic outcomes-based Council using digital innovation and partnership working to respond to the changing needs of our borough.</b></p>

## **Executive Summary**

In February 2019 the Council agreed its budget for 2019-20 and set out a Medium Term Financial Strategy (MTFS) covering the period 2019-2022. This included additional savings of £15.390m to be delivered over the extended MTFS period thereby setting a balanced budget for 3 years with £1.026m being added into general fund reserves. The Council's Capital Programme was also reviewed and updated taking into account decisions made during the year; it identified a number of new schemes and began the process of delivering a 10 year capital programme by extending the programme to 2028-29.

The Council continues to implement an Outcomes Based approach to deliver its MTFS. At the heart of its financial planning and decision making process, the Council aims to link its financial resources to Member's Strategic Priority Outcomes.

This report aims to update Cabinet on the progress to date since the MTFS was agreed in February 2019, highlight any new developments and government announcements since then; and summarises the next steps to update the MTFS by extending it to 2022-23 and agree a final budget for 2020-21. A potential budget gap of £8m for 2022-23 is highlighted together with the approach and framework being adopted to close that gap and set a balanced budget over the whole of the MTFS period.

As in previous years this will also include proposals relating to the Council's Housing Revenue Account (HRA) and the Dedicated Schools Budget (DSB) strategy.

Formal budget consultation with residents, businesses and other key stakeholders will be required and the report sets out a timeframe for this consultation that will lead to the conclusion of the budget setting process and culminate in the setting of the Council Tax for 2020-21.



## **Recommendations:**

The Mayor in Cabinet is recommended to:

1. Note the updated draft budget position for 2020-21.
2. Note the need to set a balanced budget over the whole of the MTFS period.
3. Note the issues and actions set out in this report which are informing the development of the Council's MTFS for 2020-23.
4. Note the indicative timeline of formal budget consultation with residents, businesses and other key stakeholders and to receive feedback on the consultation at Cabinet in November.

In relation to the Housing Revenue Account, the Mayor in Cabinet is recommended to:-

5. Note the most recent HRA 30 year financial modelling assumes that from 2020-21 HRA rents will increase by CPI + 1% for five years, and then by CPI only.

In relation to the Local Council Tax Reduction Scheme (LCTRS), the Mayor in Cabinet is recommended to:-

6. Maintain the existing 100% Local Council Tax Reduction Scheme for 2020-21 protecting our residents on low incomes.

## **1 REASONS FOR THE DECISIONS**

- 1.1 The Council is under a duty to set a balanced and sustainable budget and maintain adequate reserves such that it can deliver its statutory responsibilities and priorities.
- 1.2 A Medium Term Financial Strategy (MTFS) covering the entirety of the resources available to the Council is considered to be the best way that resource prioritisation and allocation decisions can be considered and agreed in a way that provides a stable and considered approach to service delivery and takes into account relevant risks and uncertainty.
- 1.3 Statutory budget consultation is required with business ratepayers however, a broader consultation with all residents and other relevant stakeholders is considered to represent best practice

## **2 ALTERNATIVE OPTIONS**

- 2.1 Whilst the Council will adopt a number of approaches to the identification of measures aimed at delivering its MTFS there is no alternative other than to set a legal and balanced budget and agree its Council Tax before the statutory deadline.
- 2.2 In relation to the HRA, on 26th February 2019 the government confirmed that it is directing the Regulator of Social Housing to include local authority registered providers within the scope of the Regulator's Rent Standard from April 2020 and has issued a policy statement for social housing rents from 2020. This confirms that registered providers will be permitted to increase rents on social rent and affordable rent properties by up to CPI+1% each year from 2020. Therefore the Council can decrease HRA rents or increase HRA rents up to a maximum of CPI + 1%.
- 2.3 A number of decisions in relation to the use of the Dedicated Schools Grant are the responsibility of the Schools Forum and the Council therefore has no option to vary that decision; however in some cases, such as in respect to changes to the School's funding formula, the Council makes the final decision having received recommendations from the Schools Forum.

## **3 DETAILS OF THE REPORT**

### **3.1. Background**

3.1.1. The medium term financial planning process is an essential part of the Council's resource allocation and strategic service planning framework. The Medium Term Financial Strategy (MTFS) integrates strategic and financial planning over a three year period. It translates the Strategic Plan priorities into a financial framework that enables the Mayor and officers to ensure policy initiatives can be delivered within available resources, and can be aligned to priority outcomes.

3.1.2. The drivers for the Council's financial strategy are:

- To set a balanced budget over the life of the MTFS whilst protecting residents from excessive Council Tax increases, as defined by the government, through the legislative framework covering Council Tax referenda.
- To fund priorities agreed within the Strategic Plan, ensuring that service and financial planning delivers these priorities.
- To deliver a programme of planned reviews and savings initiatives designed to keep reductions to service outcomes for residents to a minimum.
- To maintain and strengthen the Council's financial position so that it has sufficient contingency sums, reserves and balances to address any

future risks and unforeseen events without jeopardising key services and delivery of service outcomes for residents.

- Ensuring the Council maximises the impact of its spend to deliver priority outcomes in the context or reducing resources.

3.1.3. Since 2011-12 in the face of unprecedented reductions in Government funding and increasing demand on services, the need to make savings has dominated the Council’s financial planning process.

3.1.4. In February 2019 the Council agreed a balanced budget for 2019-20 and a Medium Term Financial Strategy (MTFS) to 2021-22 identifying further savings of £15.390m to be delivered over that period and adding £1.026m into general fund reserves.

3.1.5. This report begins to explore the challenges facing the Council in the context of a number of forthcoming fundamental changes to the financial environment in which Local Authorities operate. In particular it outlines a process that will deliver a balanced budget position over the course of the MTFS period; taking into account the views of residents, business rate payers and other interested stakeholders.

### 3.2. Strategic Approach

3.2.1. The Council has a sound approach to strategic and resource planning. The 2019-20 Strategic Plan has been developed using the Outcome Based Accountability (OBA) Framework to enable us to understand the impact our services are having and link this to the resources used to deliver those activities

3.2.2. The Strategic Plan focuses on the three priority outcomes set out below; within each outcome a number of objectives describe how services will be delivered.

**Table 1 – Strategic Priority Outcomes**

<b>Priority 1: People are aspirational, independent and have equal access to opportunities</b>	
Outcomes we want to achieve	People access a range of education, training, and employment opportunities.
	Children and young people are protected so they get the best start in life and can realise their potential.
	People access joined-up services when they need them and feel healthier and more independent.
	Inequality is reduced and people feel that they fairly share the benefits from growth.

<b>Priority 2: A borough that our residents are proud of and love to live in</b>	
Outcomes we want to achieve	People live in a borough that is clean and green.
	People live in good quality affordable homes and well-designed neighbourhoods.
	People feel safer in their neighbourhoods and anti-social behaviour is tackled.
	People feel they are part of a cohesive and vibrant community.

<b>Priority 3: A dynamic, outcomes-based Council using digital innovation and partnership working to respond to the changing needs of our borough</b>	
Outcomes we want to achieve	People say we are open and transparent putting residents at the heart of everything we do.
	People say we work together across boundaries in a strong and effective partnership to achieve the best outcomes for our residents.
	People say we continuously seek innovation and strive for excellence to embed a culture of sustainable improvement.

### **3.3. Outcome Based Budgeting**

3.3.1. Outcome Based Budgeting (OBB) aims to directly link how resources are allocated against the strategic priorities of the Council as a means of informing decision making and outcome monitoring.

3.3.2. The Council's Medium Term Financial Strategy (MTFS) 2019-2022 was prepared using these principles and this will ensure that the Council is delivering the Council's priority outcomes, as set out in the Strategic Plan, while making savings through planned budget reductions rather than cutting costs on a service by service basis.

3.3.3. We intend to continue with this approach going forward with a series of budget meetings between officers, the Mayor and Cabinet which will take place over the summer and which will consider a number of key issues including:

- A review of savings and growth proposals including high level business cases.
- Extending the MTFS by a further year to cover the period 2020-2023; identifying the gap arising from recent funding announcements and the council's options for managing these strategic issues;
- A review of the current Capital Strategy; the governance arrangements for capital projects and programmes, resource prioritisation, funding sources and strategies and consideration of any new projects and programme.

- Consideration of the impact of the Fair Funding Review due to be implemented from April 2020;
- Consideration of the impact of any national Business Rates retention scheme in 2020-21 including any proposals for a continuation of pooling within London.

### **3.4. Future Outlook for the Council's Finances**

#### **Government Funding**

- 3.4.1. The council agreed to participate in the government's guaranteed funding settlement which, for the period to 2020, indicates that Government grant in the form of Revenue Support Grant (RSG) will continue to diminish, which has decreased from around £54m in 2017-18 to around £33m in 2019-20.
- 3.4.2. The 4 year settlement ends after 2019-20 after which there is significant uncertainty from the 2019 Spending Review, changes from the introduction of new formula for distributing resources following the Fair Funding review, and changes to the national business rate retention scheme.
- 3.4.3. The 2019 Spending Review (SR19) will confirm overall Local Government resourcing from 2020-21 and will provide the financial backdrop to significant reform in Local Government finance systems including what the government say will be an updated, robust and transparent distribution methodology to set the baseline funding levels, the resetting of business rates baselines and the proposed introduction of further reforms to the business rates retention scheme. It is considered highly likely that any resulting funding redistribution will impact negatively upon Tower Hamlets.
- 3.4.4. However, given current political uncertainty, the 2019 Comprehensive Spending Review (CSR) may be delayed. In the event, an additional one-year settlement for 2020-21 is likely to be announced. The MTFS would, in that case, be updated accordingly.

#### **Business Rates Retention Scheme**

- 3.4.5. An increasing proportion of the Council's services are funded through locally generated resources such as Business Rates and Council Tax.
- 3.4.6. In 2018-19, the Council participated in the 100% London-wide Business Rates Pilot and gained a one off sum of £10.4m reflecting its share of the growth in business rates income. For 2019-20, the Secretary of State confirmed a 75% Business Rates Pilot for London in the provisional settlement. The Council is estimated to receive a further one off sum of £4m in 2019-20 for its share of the growth. This is in addition to the sum of £139.555m built into the budget for the Council's share of core Business Rates income.

#### **Consultation paper**

- 3.4.7. The government has completed its consultation on "Sharing risk and reward, managing volatility and setting up the reformed system", a technical consultation which sought views on proposals for sharing risk

and reward, managing volatility in income and setting up the reformed business rates retention system. The outcome of the consultation is yet to be determined.

### **Strategic Improvement Pot (SIP)**

3.4.8. Under the agreed terms of the London 75% Business Rates Retention Pilot Pool, 15% of the net financial benefit of pooling – currently estimated at c.£25.7 million – is reserved for the Strategic Investment Pot. In addition, funds unallocated in 2018-19 estimated at £12.8m are also available for allocation, to be spent on projects that:

- contribute to the sustainable growth of London's economy and an increase in business rates income either directly or as a result of the wider economic benefits anticipated;
- leverage additional investment funding from other private or public sources;
- have broad support across London government in accordance with the agreed governance process. Generally, this will mean a preference for collaborative bids over broader areas than just a single borough.

3.4.9. In addition, the Mayor of London is committed to spend the GLA's share of any additional net financial benefit from the pilot on strategic investment projects. As previously agreed, decisions on the allocation of the GLA's share will be made by the Mayor of London. Overall, it is anticipated that approximately 50% of net additional benefits arising from the pilot pool will be spent on strategic investment projects.

3.4.10. The Government's evaluation of the London pilot pool will include assessment of the extent to which this expectation is met, and the effectiveness of the collective decision-making arrangements in agreeing suitable investment projects.

3.4.11. Decisions regarding the Strategic Investment Pot will be taken formally in November 2019 by the City of London Corporation – as the Lead Authority – in consultation with all member authorities.

### **Council Tax and Local Council Tax Reduction Scheme (LCTRS)**

3.4.12. Council Tax continues to be an important source of revenue for the Council with £106m estimated from that source in 2020-21. The government has not announced any indication of an Adult Social Care (ASC) precept for 2020-21.

3.4.13. The Council continues to face a number of financial challenges, including demographic growth and inflationary pressures, and the continuing effect of reductions in government support. Therefore there is a need to increase the income generated from local sources including Council Tax.

3.4.14. The revised assumption included in the MTFs is that Council Tax will be increased up to the government imposed referendum level (currently expected to be at 3%). As well as this 2.99% assumed increase in Council Tax, the MTFs also assumes an increase in the tax base of 3%.

No assumption has been made regarding any Adult Social Care precept for 2020-21.

- 3.4.15. For the 2019-20 year, the Council made minor changes to the operation of the Local Council Tax Reduction Scheme (LCTRS) whilst maintaining the 100% benefit of the scheme for those on low incomes. A period of stability to the scheme is desirable, however the level of support could be considered for review due to the significant additional resources that would result.
- 3.4.16. If the Council was to change the LCTRS, this would require full consultation on any proposed changes. To meet the necessary timeline for any changes to be effective from April 2020, consultation would need to begin immediately for Council decision by the end of January.

### Core Grants

- 3.4.17. In addition to Revenue Support Grant, the Council is in receipt of a number of other grants to support specific service priorities. Current assumptions for each of these are summarised in the table below:

**Table 2 - Summary of Core Grants 2019-23**

Core Grants	2019-20 £m	2020-21 £m	2021-22 £m	2022-23 £m
New Homes Bonus	19.202	16.521	16.521	13.339
Improved Better Care Fund	14.851	12.777	12.777	12.777
Public Health Grant	34.124	33.237	32.373	31.531
School Improvement Monitoring and Brokering Grant	0.200	0.350	0.350	0.350
Local Lead Flood Grant	0.036	0	0	0
Winter Pressures Grant	1.465	0	0	0
Social Care Support Grant	2.535	0	0	0
<b>Total Core Grants</b>	<b>72.413</b>	<b>62.885</b>	<b>62.021</b>	<b>57.997</b>
NHB allocated for Capital Investment	(16.020)	(13.339)	(13.339)	(13.339)
<b>Total Core Grants (Revenue)</b>	<b>56.393</b>	<b>49.546</b>	<b>48.682</b>	<b>44.658</b>

### **New Homes Bonus**

- 3.4.18. The New Homes Bonus (NHB) scheme was introduced in 2011-12 as a means to help tackle the national housing shortage. The scheme was designed to reward those authorities who increased their housing stock either through new build or by bringing empty properties back into use.
- 3.4.19. Tower Hamlets is a high growth area, and has attracted the highest level of NHB in the country. The technical consultation on the 2019-20 Local Government Finance Settlement published in September 2018, suggested there would be an increase to the deadweight for the 2019-20 “in-year” allocations. However, through an additional £18m added to the funding of the scheme, no increase to the deadweight has been necessary.
- 3.4.20. The Council had already started to reduce its reliance on NHB as a funding source in support of its revenue budget from 2016-17 instead choosing to provide for increasing capital investment on affordable housing and infrastructure in line with its strategic priority of better quality homes for all. Of the £16.5m NHB the Council expects to receive in 2020-21 only £3.2m will be used support the revenue budget and the balance will be used for capital investments in housing and infrastructure

### **Improved Better Care Fund**

- 3.4.21. As part of the government’s 2015 Spending review, an initial tranche of Improved Better Care Fund was allocated; with another tranche in the Chancellors 2017 Spring Budget. This funding has been utilised to support continued investment in adult social care.
- 3.4.22. The future of this fund and its treatment under the Fair Funding review is not known. The MTFS assumes funding up to 2022-23 at the level of the initial IBCF allocation in 2019-20 which assumes continuation in some form and is therefore a potential risk due to uncertainty.
- 3.4.23. Similarly, the MTFS assumes the level of Better Care Fund monies to remain at current levels up to 2022-23, supporting Adult Social Care in partnership with health services.

### **Public Health Grant**

- 3.4.24. The previous three year allocation of the Public Health grant was for the period 2017-18 to 2019-20. During that period, the Public Health grant reduced by 2.6% per year. There has been no confirmation of future allocations from the Department of Health.
- 3.4.25. The current estimate of the grant for 2020-21 is £33.2m, which assumes a further decrease of 2.6%.

### **School Improvement Monitoring and Brokering Grant**

- 3.4.26. The grant has been allocated to local authorities since September 2017 to allow them to continue to monitor performance of maintained schools, broker school improvement provision, and intervene as appropriate.



3.4.27. The grant has been confirmed to August 2019. The medium term financial strategy currently estimates the grant to be £0.350m from 2020-21.

### **Fair Funding Review**

3.4.28. The government has committed to reforming the way local authorities are funded through its fair funding review which is aiming to introduce a new funding formula from April 2020.

3.4.29. The government has said that its Fair Funding Review will:

- Set new baseline funding allocations for local authorities
- deliver an up-to-date assessment of the relative needs of local authorities
- examine the relative resources of local authorities
- focus initially on the services currently funded through the local government finance settlement; and
- be developed through close collaboration with local government to seek views on the right approach.

3.4.30. The initial consultation was published by the DCLG on the 19<sup>th</sup> December 2017. This was a technical consultation on relative need and focussed specifically on potential approaches that have been identified to measure the relative needs of local authorities.

3.4.31. The consultation closed on 12 March 2018 and feedback indicates;

- Broad support for a having a single foundation formula that determines the overall funding allocation and maintaining a smaller number of service specific formulas
- Mixed views regarding use of the key cost drivers; population, deprivation and rurality

3.4.32. Changes in population, levels of deprivation together with allowances for area cost adjustments are significant factors in Tower Hamlets and how they are used in the new formula could have a material impact on Council funding under the new arrangements.

3.4.33. Whilst the Council's Medium Term Financial Strategy (MTFS) has been produced on a best estimate basis it is clear that there is significant uncertainty relating to the 2020 financial year onwards. However, it is also probable that whatever changes are introduced there will be associated transitional mechanisms put in place to ensure that the financial impact on an individual authority is not unmanageable.

3.4.34. It is expected that the government will allocate a one year settlement for 2020-21 and then a multi-year settlement for future years would take account of the fair funding consultation and spending review.

### **3.5. Growth and Inflation**

3.5.1. Within the MTFS, officers have made a number of assumptions concerning the impact of demographic growth pressures and inflation for all of the years covered by the MTFS.

- 3.5.2. The MTFS for the period 2020-22 included Adult Social Care demographic growth of £7.5m. The MTFS currently assumes further demographic growth pressures in 2022-23 of £3.0m. Work is underway to review the assumptions for 2020-23.
- 3.5.3. Budget setting will need to consider funding requirements for Children and Culture directorate demography. The MTFS that was agreed for the period 2019-22 included £0.5m permanent growth for Leaving Care services, one-off funding of £1m for SEND transport in 2019-20 and an extension to funding for Free School Meals of £2m for 2021-22.
- 3.5.4. The MTFS assumes additional inflation requirement both in respect of pay and other non-pay costs which are estimated to amount to £6.5m in 2022-23.
- 3.5.5. Pay inflation will be reviewed in line with agreed terms and conditions following the TOWER Rewards consultation, including taking account of any pay increases and increment increases.

### **3.6. Savings Programme**

- 3.6.1. Full Council have previously approved savings of £14.6m (2020-21) and £8.2m (2021-22) as summarised in Appendix 2. Additional growth, including for any undeliverable savings, means that there is a need to identify further savings over the MTFS period to 2022-23.
- 3.6.2. A number of budget meetings will be held in August through to October, which will allow officers, in discussion with lead Cabinet members and the Mayor to consider the approach to the upcoming budget. As a result a thematic approach is being applied to continue to support the Council's transformation programme – Smarter Together.

#### **The Smarter Together Themes**

- Centralised enabling services - consolidation to reduce costs and adopt a more systematic and joined up approach.
  - Digital first – maximisation the use of digital solutions in the way we do business
  - Data analytics - developing and strengthening our analytical capability to ensure the better targeting of need.
  - Alternative Delivery Options – the development of alternative delivery models for council services based on the experience of others.
  - Asset management – making the best use of our assets
  - Contract management - Centralise, strengthen and streamline contract management.
  - Community assets and resources - Develop the utilisation of existing assets
  - Build independence and resilience - Intervening at the earliest opportunity to avoid costs later.
- 3.6.3. Additional savings proposals will need to be identified for 2020-23. Officers will need to develop detailed business cases which will be

available for consultation with all relevant stakeholders during November and December. This will not obviate the need for further specific consultation where there are service implications.

### **3.7. Income Strategy**

3.7.1. The Council has needed to deliver savings of approximately £15m per year for a number of years and current indications are that savings of this magnitude will continue to be required to ensure services can continue to be provided to the most vulnerable in our communities.

3.7.2. With greater powers to charge for services and the continued budget gap, the Council will need to continue to take a strategic approach to income generation. This work will be in addition to a continued focus on existing fees and charges levied by the Council for services where it is permissible to make charges; this will ensure that costs are fully recovered and remain competitive where markets exist.

### **3.8. The Housing Revenue Account (HRA) and Rent Setting**

3.8.1 The Housing Revenue Account (HRA) relates to the activities of the Council as landlord of its dwelling stock. Since April 1990 the HRA has been “ring-fenced”. This means that any surplus or deficit on the Housing Revenue Account cannot be transferred to the General Fund. The HRA must also remain in balance.

3.8.2 From April 2012, the HRA subsidy grant was abolished and replaced by self-financing, under which local authorities retain all rental income, but are responsible for meeting all costs relating to Council housing.

#### **Rent**

3.8.3 Under HRA self-financing, local authorities were able to decide on the level of rent increase implemented each year, and although they were expected to have regard to government guidance, this was not compulsory. Previously, government guidance had suggested increases of 1% above the Consumer Price Index measure of inflation. However, with the publication of the Welfare Reform and Work Act, the discretion was removed for four years as local authorities had to implement four years of 1% rent reductions, starting in 2016-17.

#### **Social Rent policy post 2019-20**

3.8.4 On 13<sup>th</sup> September 2018 the government published a consultation ‘Rents for social housing from 2020-21’ in which the government set out its proposals in relation to social rent policy from 2020-21.

3.8.5 On 26<sup>th</sup> February 2019 the government confirmed that it is directing the Regulator of Social Housing to include local authority registered providers within the scope of the Regulator’s Rent Standard from April 2020 and has issued a policy statement for social housing rents from 2020. This confirms that registered providers will be permitted to increase rents on social rent and affordable rent properties by up to CPI+1% each year from

2020. The direction and policy statement confirm the government's intention that this settlement should remain in place for at least five years.

- 3.8.6 The most recent HRA 30 year financial modelling assumes that from 2020-21 HRA rents will increase by CPI + 1% for five years, and then by CPI only.

### **Update on Government Policies Affecting the HRA**

- 3.8.7 There have been a number of recent government consultations and announcements and these are outlined below.

### **Right to Buy receipts consultation**

- 3.8.8 The government published a consultation 'Use of receipts from Right to Buy sales' on 14<sup>th</sup> August 2018. The government has not published anything further so it is presently unclear what the outcome of the consultation is or what the government's final proposals will be.

#### *Increased time limit for spending existing Right to Buy receipts*

- 3.8.9 Current rules set out that Right to Buy one for one receipts must be spent on replacement social housing within three years. The consultation asked for views on extending the time limit for using existing receipts from three to five years, but keeping the timescales for new receipts at three years.

- 3.8.10 It should be noted that in June 2018 the Authority signed an agreement with the GLA in order that any currently retained Right to Buy one for one receipts that are unspent by the Authority by the three year deadline and are returned to the government with interest will then be passed to the GLA and subsequently ear-marked to be returned to the Authority as grant money, with another three years to spend. The Authority must make a firm commitment to deliver a programme of projects on a three-year rolling delivery programme. It is unclear whether the government's final Right to Buy proposals will have any impact on the status of this agreement.

#### *Flexibility of the 30% cap on 1-4-1 receipts funding new housing*

- 3.8.11 Under current Right to Buy rules the retained Right to Buy one for one can finance 30% of the cost of the 'replacement social housing' with the local authority financing the remaining 70% from its own resources.

- 3.8.12 The consultation set out two possible areas of flexibility over the 30%:
- a) Increase the cap to 50% of build costs for homes for social rent where LAs meet the eligibility of the Affordable Homes Programme, and can demonstrate a clear need for social rent rather than affordable rent.

- b) Permit LAs to ‘top-up’ insufficient Right to Buy receipts with funding from the Affordable Homes Programme up to 30% of build cost for affordable rent, or up to 50% of build costs for social rent, where the LA can demonstrate a need for social rent (top up bids are to be submitted to the Affordable Homes Programme).

*Use of one for one receipts for property acquisition*

3.8.13 The government is looking to restrict property acquisitions and outlined two options, but stated that its preference is option a:

- a) Introducing a cap per dwelling based on average build costs; acquiring a property at above these (indicative) caps would not be allowed:
- £268,000 in Inner London
  - £265,000 in Outer London
  - £167,000 in the South-East), or
- b) allowing acquisitions in certain areas (e.g. where average build costs are more than acquisition costs).

3.8.14 If agreed, this may mean that the Authority may not be able to use Right to Buy one for one receipts to finance 30% of the costs of any acquisitions that are higher than the average build costs in the relevant area.

3.8.15 The Authority has adopted substantial capital estimates in order to undertake property acquisitions, but may need to revise this commitment when the government publishes its final proposals.

*Cost of transferring land between the General Fund (GF) and the HRA*

3.8.16 Under current rules, where LAs transfer land from their GF to their HRA the land must – in effect – be ‘bought’ by the HRA, with an adjustment made to the HRA Capital Financing Requirement and the GF compensated for the value of the land.

3.8.17 The government’s proposal was to relax the conditions so that LAs would be able to gift GF land to the HRA at zero cost, thereby making it easier for LAs to use GF land for housing.

*Suspension of interest payments for three months*

3.8.18 Under current rules if Right to Buy one for one receipts are not returned to the government immediately then interest is payable on the sum if the local authority subsequently decides to return the receipts. The government proposed that local authorities would have a short period of time (3 months) to return receipts without paying interest.

3.8.19 The table below outlines future spend deadlines showing the (current) three year deadlines.

<b>Deadline</b>	<b>Cumulative spend needed on replacement social housing £m</b>
30-Jun-19	188.257
30-Sep-19	223.213
31-Dec-19	255.142
31-Mar-20	273.600
30-Jun-20	289.067
30-Sep-20	310.919
31-Dec-20	328.585
31-Mar-21	344.640
30-Jun-21	359.281
30-Sep-21	370.962
31-Dec-21	391.579
31-Mar-22	404.731

- 3.8.20 As outlined earlier, the Authority has an agreement with the GLA so that any currently retained Right to Buy one for one receipts unspent by the Authority by the three year deadline can be returned to the government with interest, but then passed to the GLA and subsequently returned to the Authority as grant money, with another three years to spend. Therefore the Authority now has some added flexibility in relation to its deadlines to spend current Right to Buy receipts.

#### **Removal of HRA debt cap**

- 3.8.21 The government announced in October 2018 that the HRA debt cap would be scrapped and this took effect from 29<sup>th</sup> October 2018. Removing the HRA debt cap means that instead of having a limit to the amount of debt that the HRA can undertake, HRA borrowing will in future (along with General Fund borrowing) be subject to the Prudential Code meaning that borrowing must be affordable, prudent and sustainable.
- 3.8.22 The Chief Financial Officer considers that the charging of Minimum Revenue Provision (MRP) should be made to ensure the repayment of any borrowing is made over the usable lifespan of the assets, similar to the Minimum Revenue Provision (MRP) arrangements that operate for the Council's General Fund.

#### **Savings**

- 3.8.23 At its meeting on 26<sup>th</sup> July 2016, the Mayor in Cabinet agreed a HRA medium term savings target of £6m. There is a £1 million savings target in place for 2020-21, and detailed savings proposals will be brought forward by THH as part of the 2020-21 budget process.

#### **Risks – Welfare Reform**

- 3.8.24 The cumulative impact on the HRA will not be clear until the various reforms all take effect. Provision has been made within the HRA MTFP

for an increase in bad debts but as the introduction of Universal Credit has been delayed once again it is not yet clear precisely what the future level of bad debts will be.

### 3.9. School's Funding

3.9.1. The Dedicated Schools Grant (DSG) is a ring-fenced grant used to fund pupil-led education spending. The initial notification of the value of the grant is received in the December preceding the financial year in question and updated at various stages as new data becomes available. As a ring-fenced grant any under or overspends are carried forward into future years.

3.9.2. In September 2017, the Department for Education confirmed the introduction of the national funding formula for schools, high needs and central services for 2018-19 and 2019-20. The DFE has also confirmed in order to support a smooth transition, local authorities will continue to determine local formulae in 2020-21.

3.9.3. The Schools Forum which is a statutory consultative body in respect of some matters and the decision making body in respect of other matters relating to the DSG, will continue to receive reports relating to the 2019-20 DSG strategy.

**Table 3: Indicative DSG Allocation 2019-20.**

Block	2019-20	2018-19	Change
	£m	£m	£m
<b>Schools Block</b>	260.193	259.176	1.017
<b>CSSB</b>	4.798	4.851	(0.053)
<b>High Needs Block</b>	49.574	49.058	0.516
<b>Early Years Block</b>	29.528	29.528	0.0
<b>Total</b>	<b>344.093</b>	<b>342.613</b>	<b>1.480</b>

Note: The EYB will not be updated from 2018-19 until the January 2019 census is available.

3.9.4. In 2018-19, the DSG had an estimated gross overspend position of £7.9m (within the High Needs and Early Years blocks), partially mitigated by an underspend of £2.2m from the central schools services block allocation, leaving a net overspend position of £5.7m.

3.9.5. Ongoing pressures and growth in demand for Special Education Needs (SEN) provision, including high needs transport, will need to be considered as part of budget setting for 2020-23.

### 3.10. Pension Fund

3.10.1. The pension fund is currently undergoing a triennial valuation by the actuary for 2020-21 onwards. This will impact the MTFs through a potential increase in employer contributions to meet the forecast funding deficit.

### 3.11. Capital Programme

3.11.1. The MTFS currently allows for £6.8m of capital financing costs to meet requirements for debt repayment and interest payments. This will be next reviewed in line with the capital budget plan for 2020-30 after the Capital Strategy Board in September 2019.

**3.12. Next Steps**

3.12.1. A further report will be brought to the November Cabinet which will provide a detailed update of the financial planning assumptions underpinning the current MTFS. The outcome of this will be a confirmation of the estimated funding gap over the period to 2023.

3.12.2. In the January Cabinet report, Members will be presented with updated information relating to our assumptions for Council tax and Business Rates and any impact those changes have on the MTFS.

3.12.3. The report will also bring forward the response to the Council’s budget consultation processes and seek to finalise draft savings and investment proposals, covering in full the medium term planning period to 2023 alongside a strategy that fully meets the identified funding gap.

3.12.4. The draft timetable for the budget setting process is as follows:

Activity	Date
Capital Strategy and long term Capital Programme	September – December 2019
Budget Gap and proposals to close	
Income generation strategies	
Fair Funding review update post consultation	
Future of Business rates pool and Impact on the MTFS	
Comprehensive Spending Review outcome	
Budget consultation	8 <sup>th</sup> and 29 <sup>th</sup> January Cabinet
Review of the Existing MTFS in light of the settlement.	
Capital Strategy & programme.	
Identification of potential gap and options to close the gap	By 1 <sup>st</sup> March 2020 Full Council
Agree final budget and setting of the Council Tax	

**3.13. Budget Consultation and Scrutiny Process 2020-23**

3.13.1. The council must undertake statutory budget consultation with Business Rate payers in the borough and it is also good practice to consult with Council Tax payers and a broad range of other stakeholders. In addition, meaningful consultation must take place with service users before any



changes to service provision are implemented. Furthermore, the Council's budget framework sets out the need for the Overview and Scrutiny committee to be fully involved in the setting of the council's budget.

- 3.13.2. The Cabinet are asked to note that the Council's budget consultation will be carried out in November.
- 3.13.3. The scrutiny and consultation processes will recognise that developing proposals over a three year period means that business cases will be more fully developed for proposals in the early years but that others will continue to be developed later on. The on-going role of the Overview and Scrutiny Committee in scrutinising developed business cases and undertaking targeted reviews in a number of key areas identified by them is key to maintaining the rigour of budget scrutiny of the Medium Term Financial Strategy (MTFS).
- 3.13.4. In addition to the scrutiny of relevant revenue savings and investment proposals the O&S Committee will undertake similar scrutiny of capital programme proposals. They will also have an overview of the medium term financial proposals being considered for approval by the board of Tower Hamlets Homes (THH), including proposals for rent setting and medium term savings. Similarly, the budget strategy for the Dedicated Schools Budget (DSB) which will be proposed for approval by the Cabinet, from the Schools Forum.

<b>Activity</b>	<b>Date</b>	<b>Outcome</b>
<b>Budget Consultation</b>	November 2019	Outcome reported to OSC, Cabinet and reflected in detailed budget proposals.
<b>Budget and Policy Framework – Budget Scrutiny meeting</b>	13 <sup>th</sup> January 2020 3 <sup>rd</sup> February 2020 (if there are any changes to budget following Cabinet on 29 <sup>th</sup> January)	Review final Cabinet budget proposals and provide comments for consideration by Cabinet and Full Council.

#### **4 EQUALITIES IMPLICATIONS**

- 4.1 Strategic budget implications in respect of the Council's available funding and budget risks will tend to apply equally across all groups with protected characteristics or otherwise.
- 4.2 The HRA and DSG are ring-fenced funding allocations with prescriptions governing their use. In addition a number of grants received by the Council can only be used in accordance with specified conditions.
- 4.3 The Council must maintain a Local Council Tax Reduction Scheme which will prescribe those individuals that can gain relief from the full cost of their Council tax bill. Government legislation also preserves some historic protections for other groups such as those not of working age.

- 4.4 Individual budget proposals will also be subject to consultation which will consider specifically the impact on groups with protected characteristics and where appropriate put in place mitigation measures.

## **5 OTHER STATUTORY IMPLICATIONS**

- 5.1 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:
- Best Value Implications,
  - Consultations,
  - Environmental (including air quality),
  - Risk Management,
  - Crime Reduction,
  - Safeguarding.
  - Data Protection / Privacy Impact Assessment.
- 5.2 The Council is required to consider the value for money implications of its decisions and to secure best value in the provision of all its services. It is important that, in considering the budget, Members satisfy themselves that resources are allocated in accordance with priorities and that best value is achieved.
- 5.3 Managing financial risk is of critical importance to the Council and maintaining financial health is essential for sustaining and improving service performance. Setting a balanced and realistic budget is a key element in this process. Specific budget risks will be reported to Cabinet as the budget process develops.
- 5.4 In addition the Council will maintain a range of budget provision (contingency) earmarked reserves for specific risks and general reserves for unforeseen events and risks.

## **6 COMMENTS OF THE CHIEF FINANCE OFFICER**

- 6.1 This report is primarily financial in nature and reflects the advice of the Council's Chief Financial Officer. No additional comments are required.

## **7 COMMENTS OF LEGAL SERVICES**

- 7.1 The report updates the revised medium term financial plan. This is a matter that informs the budget process and may be viewed as a related function. It is, in any event, consistent with sound financial management and the

Council's obligation under section 151 of the Local Government Act 1972 for the Council to adopt and monitor a medium term financial plan.

- 7.2 The report provides information about risks associated with the medium term financial plan and the budget. This is, again, consistent with the Council's obligation under section 151 of the Local Government Act 1972 to make proper arrangements for the management of its financial affairs. It is also consistent with the Council's obligation under the Accounts and Audit Regulations 2015 to have a sound system of internal control which facilitates the effective exercise of the Council's functions and which includes arrangements for the management of risk. The maintenance and consideration of information about risk, such as is provided in the report, is part of the way in which the Council fulfils this duty.
- 7.3 The Council is a best value authority within the meaning of section 1 of the Local Government Act 1999. As such the Council is required under section 3 of the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness (the best value duty). Having a medium term financial plan therefore contributes to achieving this legal duty.

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## **Linked Reports, Appendices and Background Documents**

### **Linked Report**

- None.

### **Appendices**

- Appendix 1 - Budget Setting Timetable
- Appendix 2 - Summary MTFs Position 2019-23
- Appendix 3 - Existing Savings Summary 2019-22

### **Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012**

- None,

### **Officer contact details for documents:**

Allister Bannin x3930

Shakil Rahman x1658

## BUDGET SETTING TIMETABLE 2020-21

Date of Meeting	Paper Submission Deadline	Meeting and Agenda
Wed 08 May 2019		<b>MAB</b> Budget briefing for Members on key issues such as Business Rates Retention and Fair Funding Review
Tue 02 July 2019	Wed 26 June 2019	<b>CLT</b> MTFS Refresh & 2020-21 Budget Planning Report Budget Setting Timetable Existing Savings Summary 2019-22 MTFS Funding Gap
Wed 10 July 2019	Thu 04 July 2019	<b>MAB</b> MTFS Refresh & 2020-21 Budget Planning Report
Wed 31 July 2019	Fri 19 July 2019	<b>CABINET</b> MTFS Refresh & 2020-21 Budget Planning Report
Tue 13 August 2019	Wed 07 August 2019	<b>CLT</b> Identify New Growth Proposals and Pressures Consider Areas for New Savings
Tue 20 August 2019	Wed 14 August 2019	<b>CLT</b> Fees & Charges 2020-21 Review of Council Tax Reduction Scheme Develop New Savings & Business Cases Develop New Growth Proposals
<b>DATE TBC</b>		<b>Labour Group Meeting</b>
Tue 03 September 2019	Wed 28 August 2019	<b>CLT</b> Develop New Savings & Business Cases Develop New Growth Proposals
Wed 11 September 2019	Thu 05 September 2019	<b>MAB</b> Growth Proposals / Manifesto Commitments / Inflation New Savings Proposals 2020-21 onwards Fees & Charges 2020-21
Tue 17 September 2019	Wed 11 September 2019	<b>CLT</b> Agree New Savings & Business Cases Agree New Growth/ Manifesto Commitments / Inflation Capital Programme 2020-21 onwards Fees & Charges 2020-21 HRA Budget/ MTFP & Rent Setting 2020-21
<b>DATE TBC</b>		<b>Labour Group Meeting</b>
Wed 25 September 2019	Thu 19 September 2019	<b>MAB</b> Agree New Savings & Business Cases Agree New Growth/ Manifesto commitment/ Inflation Capital Programme 2020-21 onwards Fees & Charges 2020-21 HRA Budget/ MTFP & Rent Setting 2020-21
Tue 01 October 2019	Wed 25 September 2019	<b>CLT</b> Agree final proposals in advance of Budget Consultation - Report to Cabinet Capital Programme 2020-21 onwards Review MTFP position
Wed 09 October 2019	Thu 03 October 2019	<b>MAB</b> Agree Final Proposals in advance of Budget Consultation - Report to Cabinet Capital Programme 2020-21 onwards Review MTFP position
<b>DATE TBC</b>		<b>Labour Group Meeting</b>
Tue 15 October 2019	Wed 09 October 2019	<b>CLT</b> MTFS Budget Update Report 2020-23 Fees & Charges Report 2020-21 Council Tax Base Report 2020-21
<b>DATE TBC</b>		<b>Labour Group Meeting</b>
Tue 22 October 2019	Wed 16 October 2019	<b>CLT</b> MTFS Budget Update Report 2020-23 Fees & Charges Report 2020-21 Council Tax Base Report 2020-21
Tue 05 November 2019	Wed 30 October 2019	<b>CLT</b> HRA Rent Setting Report 2020-21 Fees & Charges Report 2020-21

## BUDGET SETTING TIMETABLE 2020-21

Date of Meeting	Paper Submission Deadline	Meeting and Agenda
Wed 06 November 2019	Thu 31 October 2019	<b>MAB</b> MTFS Budget Update Report 2020-23 2020-21 Budget Consultation process begins
<b>DATE TBC</b>		<b>Autumn Statement / Chancellors Budget</b>
<b>DATE TBC</b>		<b>Labour Group Meeting</b>
Wed 27 November 2019	Fri 15 November 2019	<b>CABINET</b> MTFS Budget Update Report 2020-23
Tue 03 December 2019	Wed 27 November 2019	<b>CLT</b> Budget Report 2020-21 and MTFS 2020-23 Fees & Charges Report 2020-21 Council Tax Base Report 2020-21 Local Council Tax Reduction Scheme 2020-21 School's Budget (School's Forum)
<b>DATE TBC</b>		<b>Government Funding Settlement – specific details received</b>
Wed 11 December 2019	Thu 05 December 2019	<b>MAB</b> Budget Report 2020-21 and MTFS 2020-23 Fees & Charges Report 2020-21 Council Tax Base Report 2020-21 Local Council Tax Reduction Scheme 2020-21 School's Budget (School's Forum)
Mon 16 December 2019	DATE TBC	<b>O&amp;S</b> Feedback - Post budget consultation
<b>DATE TBC</b>		<b>Labour Group Meeting</b>
Wed 08 January 2020	Tue 17 December 2019	<b>CABINET</b> Budget Report 2020-21 and MTFS 2020-23 Fees & Charges Report 2020-21 Council Tax Base Report 2020-21 Local Council Tax Reduction Scheme 2020-21
Mon 13 January 2020	DATE TBC	<b>O&amp;S- Budget Scrutiny</b> Budget Report 2020-21 and MTFS 2020-23
Tue 14 January 2020	Wed 08 January 2020	<b>CLT</b> Budget Report 2020-21 and MTFS 2020-23 Treasury Management Strategy Statement 2020-21
Wed 15 January 2020	Thu 09 January 2020	<b>MAB</b> Budget Report 2020-21 and MTFS 2020-23
Wed 15 January 2020		<b>FULL COUNCIL</b> Local Council Tax Reduction Scheme 2020-21
<b>DATE TBC</b>		<b>Labour Group Meeting</b>
Wed 29 January 2020	Fri 17 January 2020	<b>CABINET</b> Budget Report 2020-21 and MTFS 2020-23
Mon 03 February 2020	DATE TBC	<b>O&amp;S- Budget Scrutiny</b> Budget Report 2020-21 and MTFS 2020-23
<b>DATE TBC</b>		<b>Audit Committee (Preferred Route for Approval)</b> Treasury Management Strategy Statement 2020-21
Wed 19 February 2020	DATE TBC	<b>FULL COUNCIL- First Budget Meeting</b> Budget Report 2020-21 and MTFS 2020-23 Treasury Management Strategy Statement 2020-21
Thu 27 February 2020	DATE TBC	<b>FULL COUNCIL- Second Budget Meeting</b> Budget Report 2020-21 and MTFS 2020-23 Treasury Management Strategy Statement 2020-21

## Appendix 2 - Summary MTFS Position 2019-23

	2019-20	2020-21	2021-22	2022-23
	£'000	£'000	£'000	£'000
<b>Net Service Costs</b>	343,730	342,560	331,154	330,403
<b>Growth</b>				
Previously Approved by Full Council	(5,358)	38	(5,445)	(3,550)
New	11,533	(4,354)	6,353	3,000
<b>Savings</b>				
Previously Approved by Full Council	(13,174)	(9,030)	-	-
Written off- Previously Approved by Full Council	-	-	-	-
New	(1,671)	(5,560)	(8,159)	-
<b>Inflation</b>	7,500	7,500	6,500	6,500
<b>Total Funding Requirement</b>	<b>342,560</b>	<b>331,154</b>	<b>330,403</b>	<b>336,353</b>
<b>Revenue Support Grant / Business Rates</b>	(176,836)	(170,053)	(167,508)	(167,508)
<b>Council Tax</b>	(100,331)	(106,431)	(112,902)	(116,289)
<b>Core Grants</b>	(56,393)	(49,546)	(48,682)	(44,658)
<b>Earmarked Reserves</b>	(8,576)	(6,445)	(1,000)	(0)
<b>Total Funding</b>	<b>(342,137)</b>	<b>(332,477)</b>	<b>(330,092)</b>	<b>(328,456)</b>
<b>Budget Gap (excluding use of Reserves)</b>	423	(1,323)	311	7,897
<b>Budgeted GF Reserve Contribution/ Drawdown (+/-)</b>	(423)	1,323	(311)	-
<b>UNFUNDED GAP</b>	-	-	-	7,897
	<b>31/03/2020</b>	<b>31/03/2021</b>	<b>31/03/2022</b>	<b>31/03/2023</b>
<b>Balance on General Fund Reserves (£000s)</b>	26,577	27,900	27,589	19,692

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## Existing Savings 2019-22 Summary

## Appendix 3

2019-20			2020-21	2021-22
Savings target	Slippage from previous year	Revised Savings target	Savings target	Savings target
£'000	£'000	£'000	£'000	£'000

Directorate	2019-20 Savings target (£'000)	2019-20 Slippage (£'000)	2019-20 Revised Savings target (£'000)	2020-21 Savings target (£'000)	2021-22 Savings target (£'000)
Health, Adults & Community	2,752	679	3,431	1,190	1,700
Children & Culture	3,483	1,590	5,073	1,500	300
Place	2,416	490	2,906	3,380	329
Governance	50	-	50	-	-
Resources	525	2,250	2,775	2,770	200
Cross-Directorate	5,619	5,248	10,867	5,750	5,630

<b>Total</b>	<b>14,845</b>	<b>10,257</b>	<b>25,102</b>	<b>14,590</b>	<b>8,159</b>
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Savings Achievement Status	2019-20 Savings target (£'000)	2019-20 Slippage (£'000)	2019-20 Revised Savings target (£'000)	2020-21 Savings target (£'000)	2021-22 Savings target (£'000)
Savings Delivered / On Target	6,067	61	6,128	14,590	8,159
Savings Slipping but Achievable	6,959	8,359	15,318	-	-
Not Deliverable / Not Achievable	1,819	1,837	3,656	-	-

<b>Total</b>	<b>14,845</b>	<b>10,257</b>	<b>25,102</b>	<b>14,590</b>	<b>8,159</b>
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Reference	Directorate	Title	Savings Achievement Status	Year Approved	2019-20			2020-21	2021-22
					Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Savings target £'000	Savings target £'000
<b>Savings Delivered / On Target</b>									
SAV/ HAC 01 / 18-19	Health, Adults & Community	Adult Social Care Transformation	Savings Delivered / On Target	2018-19	-	-	-	1,000	-
ADU002/17-18	Health, Adults & Community	Community Equipment Service	Savings Delivered / On Target	2017-18	308	-	<b>308</b>	-	-
SAV / HAC 003 / 19-20	Health, Adults & Community	Promoting Independence and in Borough Care for Adults with Disabilities	Savings Delivered / On Target	2019-20	-	-	-	-	700
ADU004/17-18	Health, Adults & Community	Reshaping Reablement Services	Savings Delivered / On Target	2017-18	319	-	<b>319</b>	-	-
ADU001/17-18	Health, Adults & Community	Social Care Services for Older People	Savings Delivered / On Target	2017-18	500	-	<b>500</b>	-	-
CLC003a/17-18	Health, Adults & Community	Service Redesign - Safer Communities	Savings Delivered / On Target	2017-18	255	-	<b>255</b>	-	-
SAV / HAC 001 / 19-20	Health, Adults & Community	Efficiencies in Commissioned Services for Adult Social Care	Savings Delivered / On Target	2019-20	-	-	-	-	1,000
SAV / HAC 002 / 19-20	Health, Adults & Community	Integrated Commissioning Efficiencies	Savings Delivered / On Target	2019-20	100	-	<b>100</b>	190	-
ADU009/17-18	Health, Adults & Community	Public Health – 0-19 Public Health Programme Savings	Savings Delivered / On Target	2017-18	311	-	<b>311</b>	-	-
ADU013/17-18	Health, Adults & Community	Public Health - Sexual Health Services	Savings Delivered / On Target	2017-18	100	-	<b>100</b>	-	-
SAV / CHI 002/ 19-20	Children & Culture	Adoption Allowances	Savings Delivered / On Target	2019-20	150	-	<b>150</b>	50	50
SAV / CHI 003 / 19-20	Children & Culture	Fostering Grants Underspend	Savings Delivered / On Target	2019-20	150	-	<b>150</b>	-	-
SAV / CHI 004 / 19-20	Children & Culture	Sharing Costs with CCG for Children With Disabilities	Savings Delivered / On Target	2019-20	-	-	-	600	-
CHI004/17-18	Children & Culture	Integrating Employment Services for Young People	Savings Delivered / On Target	2017-18	143	-	<b>143</b>	-	-
SAV / CHI 005 / 19-20	Children & Culture	Parent and Family Support Services (Traded Model)	Savings Delivered / On Target	2019-20	-	-	-	150	-
SAV / CHI 001 / 19-20	Children & Culture	Governor Services - Service Redesign	Savings Delivered / On Target	2019-20	150	-	<b>150</b>	-	-
CLC005/17-18	Children & Culture	Culture, Learning & Leisure Service Efficiencies	Savings Delivered / On Target	2017-18	-	21	<b>21</b>	-	-
SAV/ CHI 01 / 18-19	Children & Culture	Events In Parks - Income Generation	Savings Delivered / On Target	2018-19	-	-	-	350	-
CLC002/17-18	Children & Culture	Income Optimisation Opportunities	Savings Delivered / On Target	2017-18	40	40	<b>80</b>	-	-
SAV / CHI 006 / 19-20	Children & Culture	Community Language Service	Savings Delivered / On Target	2019-20	31	-	<b>31</b>	350	250

Reference	Directorate	Title	Savings Achievement Status	Year Approved	2019-20			2020-21	2021-22
					Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Savings target £'000	Savings target £'000
SAV / PLA 002 / 19-20	Place	Appropriation of Housing Revenue Account (HRA) Shops to General Fund (GF)	Savings Delivered / On Target	2019-20	800	-	<b>800</b>	-	-
SAV/ PLA 03 / 18-19	Place	Reduction in Running costs/ Liability of Council Assets	Savings Delivered / On Target	2018-19	-	-	-	100	-
SAV / PLA 004 / 19-20	Place	Economic Development Service Efficiencies	Savings Delivered / On Target	2019-20	40	-	<b>40</b>	-	-
SAV/ PLA 02 / 18-19	Place	Review of Housing Delivery (THH/TH)	Savings Delivered / On Target	2018-19	-	-	-	100	-
SAV / PLA 003 / 19-20	Place	Pan-London Homelessness Prevention Procurement Hub ("Capital Letters")	Savings Delivered / On Target	2019-20	100	-	<b>100</b>	200	-
SAV / PLA 005 / 19-20	Place	Parking – Operational Changes and Policy Review	Savings Delivered / On Target	2019-20	-	-	-	500	329
D&R001/17-18	Place	Responding to Competition in Planning	Savings Delivered / On Target	2017-18	76	-	<b>76</b>	-	-
SAV / PLA 001 / 19-20	Place	Street Naming & Numbering Fee Restructure	Savings Delivered / On Target	2019-20	100	-	<b>100</b>	-	-
SAV/ PLA 04 / 18-19	Place	Street Lighting Efficiencies	Savings Delivered / On Target	2018-19	-	-	-	180	-
SAV/ C001/17-18	Place	Waste Management Contract Efficiencies	Savings Delivered / On Target	2017-18	1,000	-	<b>1,000</b>	-	-
SAV/ PLA 01 / 18-19	Place	Waste, Recycling & Street Cleansing Contract	Savings Delivered / On Target	2018-19	-	-	-	200	-
SAV/ PLA 05 / 18-19	Place	Review of Parks	Savings Delivered / On Target	2018-19	-	-	-	300	-
SAV / PLA 006 / 19-20	Place	Waste Fleet Alternative Funding	Savings Delivered / On Target	2019-20	-	-	-	1,800	-
SAV / ALL 004 / 19-20	Governance	Reduction in Enabling and Support Services Costs	Savings Delivered / On Target	2019-20	50	-	<b>50</b>	-	-
RES002/17-18	Resources	Benefits Service Admin Savings	Savings Delivered / On Target	2017-18	525	-	<b>525</b>	-	-
SAV/ RES 01 / 18-19	Resources	Improved Recovery of Housing Benefits Overpayments	Savings Delivered / On Target	2018-19	-	-	-	500	-
SAV/ RES 06 / 18-19	Resources	Finance Services – Process improvements and new Finance System Implementation	Savings Delivered / On Target	2018-19	-	-	-	100	-
SAV/ RES 10 / 18-19	Resources	Additional Local Presence Efficiencies	Savings Delivered / On Target	2018-19	-	-	-	300	-
SAV/ RES 08 / 18-19	Resources	Income Through Housing Companies	Savings Delivered / On Target	2018-19	-	-	-	250	-
SAV/ RES 09 / 18-19	Resources	THH - Potential support service Savings	Savings Delivered / On Target	2018-19	-	-	-	100	-
SAV/ RES 02 / 18-19	Resources	HR Services - Additional Staffing Efficiencies	Savings Delivered / On Target	2018-19	-	-	-	100	-

Reference	Directorate	Title	Savings Achievement Status	Year Approved	2019-20			2020-21	2021-22
					Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Savings target £'000	Savings target £'000
SAV/ RES 05 / 18-19	Resources	ICT Savings	Savings Delivered / On Target	2018-19	-	-	-	750	-
SAV / RES 001 / 19-20	Resources	Improvements in Self Service and Digital uptake for Council Tax and Business Rates	Savings Delivered / On Target	2019-20	-	-	-	-	200
SAV / RES 002 / 19-20	Resources	Reduction in Funding for Discretionary Rates Relief	Savings Delivered / On Target	2019-20	-	-	-	220	-
SAV/ RES 04 / 18-19	Resources	Revenue Services – Workforce efficiencies through greater self-service and automation	Savings Delivered / On Target	2018-19	-	-	-	100	-
SAV/ RES 03 / 18-19	Resources	Internal Audit – Streamline Management and Explore Shared Service Options	Savings Delivered / On Target	2018-19	-	-	-	50	-
SAV/ RES 07 / 18-19	Resources	Income Through Wi-Fi Concession Contract	Savings Delivered / On Target	2018-19	-	-	-	300	-
SAV/ CORP 02 / 18-19	Cross-Directorate	Contract Management Efficiencies	Savings Delivered / On Target	2018-19	-	-	-	4,250	-
Page 716 L002/17-18	Cross-Directorate	Fees & Charges	Savings Delivered / On Target	2017-18	419	-	<b>419</b>	-	-
L010/17-18	Cross-Directorate	ICT Centralisation	Savings Delivered / On Target	2017-18	400	-	<b>400</b>	-	-
SAV / ALL 006 / 19-20	Cross-Directorate	Mainstream Grants (MSG) Alternative Delivery Model	Savings Delivered / On Target	2019-20	-	-	-	-	330
SAV / ALL 005 / 19-20	Cross-Directorate	Asset Management Service	Savings Delivered / On Target	2019-20	-	-	-	-	500
SAV / ALL 007 / 19-20	Cross-Directorate	Greater Commercialisation	Savings Delivered / On Target	2019-20	-	-	-	1,000	1,500
SAV / ALL 002 / 19-20	Cross-Directorate	Counter Fraud Initiatives	Savings Delivered / On Target	2019-20	-	-	-	-	100
SAV / ALL 003 / 19-20	Cross-Directorate	Contract Management	Savings Delivered / On Target	2019-20	-	-	-	500	1,000
SAV / ALL 001 / 19-20	Cross-Directorate	Phase 2 Local Presence - putting Digital First	Savings Delivered / On Target	2019-20	-	-	-	-	700
SAV / ALL 004 / 19-20	Cross-Directorate	Reduction in Enabling and Support Services Costs	Savings Delivered / On Target	2019-20	-	-	-	-	1,500
<b>Savings Delivered / On Target</b>					<b>6,067</b>	<b>61</b>	<b>6,128</b>	<b>14,590</b>	<b>8,159</b>
<b>Savings Slipping but Achievable</b>									
ADU008/17-18	Health, Adults & Community	Day Opportunities Provision	Savings Slipping but Achievable	2017-18	140	100	<b>240</b>	-	-
ADU003/17-18	Health, Adults & Community	Helping People with Learning Disability live Independently	Savings Slipping but Achievable	2017-18	619	550	<b>1,169</b>	-	-
ADU007/17-18	Health, Adults & Community	Improving Employment Support for Adults with Disabilities	Savings Slipping but Achievable	2017-18	100	29	<b>129</b>	-	-

Reference	Directorate	Title	Savings Achievement Status	Year Approved	2019-20			2020-21	2021-22
					Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Savings target £'000	Savings target £'000
CHI002/17-18	Children & Culture	Better support for families through early help, and reduction in social care demand	Savings Slipping but Achievable	2017-18	1,000	-	1,000	-	-
D&R002/17-18	Place	Maximising use of technology in Housing Options Service	Savings Slipping but Achievable	2017-18	300	-	300	-	-
CLC007/16-17	Place	Review of Enforcement Function- More Generic Working	Savings Slipping but Achievable	2016-17	-	351	351	-	-
CLC008/16-17	Place	School Crossing Patrols to be delivered by Schools	Savings Slipping but Achievable	2016-17	-	89	89	-	-
ALL004/17-18	Resources	Centralisation of Finance	Savings Slipping but Achievable	2017-18	-	1,000	1,000	-	-
RES001a/17-18	Resources	Human Resources	Savings Slipping but Achievable	2017-18	-	1,250	1,250	-	-
ALL009/17-18	Cross-Directorate	Consolidation of Business Support and Administration Functions	Savings Slipping but Achievable	2017-18	-	1,000	1,000	-	-
ALL003/17-18	Cross-Directorate	Debt Management & Income Optimisation	Savings Slipping but Achievable	2017-18	1,500	1,500	3,000	-	-
RES006/17-18	Cross-Directorate	Functional Consolidation of Procurement	Savings Slipping but Achievable	2017-18	-	250	250	-	-
RES001b/17-18	Cross-Directorate	Human Resources	Savings Slipping but Achievable	2017-18	2,000	-	2,000	-	-
ALL006/17-18	Cross-Directorate	Local Presence / Contact Centre Review	Savings Slipping but Achievable	2017-18	800	1,250	2,050	-	-
ALL001/17-18	Cross-Directorate	Review of Printing/ Scanning/ Use of Multi-Functional Devices (MFD's)	Savings Slipping but Achievable	2017-18	500	990	1,490	-	-
<b>Savings Slipping but Achievable</b>					<b>6,959</b>	<b>8,359</b>	<b>15,318</b>	-	-
<b>Not Deliverable / Not Achievable</b>									
D&R008/16-17	Place	Generating more income from council assets	Not Deliverable / Not Achievable	2016-17	-	50	50		
CHI005/17-18	Children & Culture	Better targeting of services for children with special educational need and disabilities (SEND)	Not Deliverable / Not Achievable	2017-18	740	200	940		
CHI003/17-18	Children & Culture	Increasing the involvement of partners in Early Years services	Not Deliverable / Not Achievable	2017-18	1,079	1,329	2,408		
SAV/ CORP 01 / 18-19	Cross-Directorate	Treasury Management Investment Opportunities	Not Deliverable / Not Achievable	2018-19	-	258	258		
<b>Not Deliverable / Not Achievable</b>					<b>1,819</b>	<b>1,837</b>	<b>3,656</b>	-	-
<b>Total</b>					<b>14,845</b>	<b>10,257</b>	<b>25,102</b>	<b>14,590</b>	<b>8,159</b>

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<p><b>Cabinet</b></p> <p>31 July 2019</p>	 <p><b>TOWER HAMLETS</b></p>
<p><b>Report of:</b> David Courcoux, Head of the Mayor’s Office</p>	<p><b>Classification:</b> Unrestricted</p>
<p><b>Nominations to Outside Bodies 2019-20</b></p>	

<b>Lead Member</b>	<b>Mayor John Biggs</b>
<b>Originating Officer(s)</b>	Joel West, Senior Committee Services Officer
<b>Wards affected</b>	All Wards
<b>Key Decision?</b>	No
<b>Forward Plan Notice Published</b>	N/A
<b>Reason for Key Decision</b>	N/A
<b>Strategic Plan Priority / Outcome</b>	<b>A dynamic outcomes-based Council using digital innovation and partnership working to respond to the changing needs of our borough.</b>

**Executive Summary**

It is the responsibility of the Mayor to nominate representatives to certain Outside Bodies on behalf of Tower Hamlets Council.

Paragraphs 3.5 of the report list proposed appointments to Outside Bodies for the Mayor to consider. Although all appointments are reviewed regularly, they are, unless stated elsewhere in this report, valid until such time as they are amended or renewed by a Mayoral decision.

**Recommendations:**

The Mayor in Cabinet is recommended to:

1. Agree the nominations to Outside Bodies as shown in Paragraph 3.5.

**1 REASONS FOR THE DECISIONS**

- 1.1 Having representatives on outside bodies increases the Council’s engagement with the local community and improves its potential to offer leadership and guidance in relation to activities taking place in the borough.

## **2 ALTERNATIVE OPTIONS**

- 2.1 The Mayor could decide not to make appointments to outside bodies at all. However, this is not recommended as it would reduce the Council's opportunity to be involved in and to support good work within the community and it would also reduce the Council's leadership opportunities. There are also a number of bodies where the Council is required or expected to provide a representative.

## **3 DETAILS OF THE REPORT**

- 3.1 Participating in the work of outside bodies is an important part of the role of elected Members but is different in nature from other aspects such as being a member of a local authority executive or sitting on regulatory committees. In some cases it will involve actively representing and defending the authority's interests on local authority associations. In others it will involve becoming a trustee of a charity or a director of a company limited by guarantee. In this case Members have a duty to act in the best interests of the organisation to which they have been appointed rather than exclusively pursue the authority's interests. There are potential tensions in carrying out this role effectively. To this end guidance will be sent to all those nominated to outside bodies.
- 3.2 A key part of this role is ensuring that information about the activities of outside bodies is communicated to the Council. Much of this may take place through day to day contact with colleagues or with officers responsible for that area of work.

### **Billingsgate Market Consultative Advisory Committee**

- 3.3 The Billingsgate Market Advisory Committee makes representations to the City of London Corporation on any matter it thinks fit concerning the management or operation of the market. There is provision for up to two representatives from the London Borough of Tower Hamlets on the outside body. The Council's current nominees are Councillors Peter Golds and Kyrsten Perry, agreed by the Mayor in November 2018.

### **Ocean Regeneration Trust Board**

- 3.4 The Ocean Regeneration Trust aims to develop the capacity and skills of the members of socially and disadvantaged communities in such a way that they are better able to identify and help meet their needs and to participate more fully in society, in particular (but not limited to) in the area of the Ocean Estate in the London Borough of Tower Hamlets. The Council's current nominees are Councillors Dipa Das and Asma Islam, agreed by the Mayor in September and November 2018 respectively.



3.5 The nominations to be made to the Outside Body are:

<b>Outside Body</b>	<b>Mayor or Council Nomination</b>	<b>Nominees permitted</b>	<b>2019/20 nominee(s)*</b>
Billingsgate Market Consultative Advisory Committee	Mayor	Two	Cllr Peter Golds; Cllr Candida Ronald
Ocean Regeneration Trust Board	Mayor	Two	Cllr Dipa Das; Cllr James King**

\*Cllr Kyrsten Perry's nomination to the Advisory Committee, agreed November 2018, is to be rescinded.

\*\* Cllr Asma Islam's nomination to the Board, agreed November 2018, is to be rescinded.

#### **4 EQUALITIES IMPLICATIONS**

4.1 Nominating representatives to outside bodies increases the Council's engagement with the local community and improves its potential to offer leadership and guidance in relation to activities taking place in the Borough

#### **5 OTHER STATUTORY IMPLICATIONS**

5.1 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:

- Best Value Implications,
- Consultations,
- Environmental (including air quality),
- Risk Management,
- Crime Reduction,
- Safeguarding.
- Data Protection / Privacy Impact Assessment.

#### **Risk Management Implications**

5.2 Where appropriate it is important that any training/support needs of new appointees are identified by the bodies concerned and that appropriate training and support is delivered.

5.3 The nomination of representatives to outside bodies enables the Council to strengthen links with the community. The nomination of representatives also contributes to the Council's leadership role in the community.

## **6 COMMENTS OF THE CHIEF FINANCE OFFICER**

- 6.1 This report requests the Mayor in Cabinet to agree the nominations to outside bodies as outlined in the table at section 3.5, and as such there are no direct financial implications arising from this report.

## **7 COMMENTS OF LEGAL SERVICES**

- 7.1 The appointments in paragraph 3.5 are the responsibility of the executive. The Mayor therefore has responsibility for this appointment under the Constitution and is therefore legally entitled to make these appointments.
- 7.2 When considering appointments or the approach to be taken to appointments, the Council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who don't (the public sector equality duty). It is important to be satisfied that any process followed is supportive of equal opportunity.
- 

### **Linked Reports, Appendices and Background Documents**

#### **Linked Report**

- None.

#### **Appendices**

- None.

#### **Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012**

- None.

#### **Officer contact details for documents:**

Joel West, Senior Committee Officer 020 7364 4207

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