

Cabinet



Wednesday, 3 March 2021 at 5.30 p.m.

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

Agenda

Mayor John Biggs

Cabinet Members

Councillor Sirajul Islam	(Statutory Deputy Mayor for Community Safety, Faith and Equalities)
Councillor Rachel Blake	(Deputy Mayor and Cabinet Member for Adults, Health and Wellbeing)
Councillor Asma Begum	(Deputy Mayor and Cabinet Member for Children, Youth Services and Education)
Councillor Sabina Akhtar	(Cabinet Member for Culture, Arts and Brexit)
Councillor Danny Hassell	(Cabinet Member for Housing)
Councillor Candida Ronald	(Cabinet Member for Resources and the Voluntary Sector)
Councillor Motin Uz-Zaman	(Cabinet Member for Work and Economic Growth)
Councillor Mufeedah Bustin	Cabinet Member for Planning and Social Inclusion (Job Share) - Lead on Social Inclusion*
Councillor Asma Islam	Cabinet Member for Environment and Public Realm (Job Share) - Lead on Environment
Councillor Eve McQuillan	Cabinet Member for Planning and Social Inclusion (Job Share) - Lead on Planning
Councillor Dan Tomlinson	Cabinet Member for Environment and Public Realm (Job Share) - Lead on Public Realm*

[The quorum for Cabinet is 3 Members]

* Indicated Members are not formal Cabinet Members at this time.

Further Information

Reports for consideration, meeting contact details, public participation and more information on Cabinet decision-making is available on the following pages.



Public Information

Viewing or Participating in Cabinet Meetings

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. Except where any exempt/restricted documents are being discussed, the public are welcome to view this meeting through the Council's webcast system.

Physical Attendance at the Town Hall is not possible at this time.

Meeting Webcast

The meeting is being webcast for viewing through the Council's webcast system.

<http://towerhamlets.public-i.tv/core/portal/home>

Contact for further enquiries:

Matthew Mannion, Democratic Services,
1st Floor, Town Hall, Mulberry Place, 5 Clove Crescent, London, E14 2BG
Tel: 020 7364 4651
E-mail: matthew.mannion@towerhamlets.gov.uk
Web:<http://www.towerhamlets.gov.uk>

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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. 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 Cabinet or by the Mayor 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, above £1million; 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

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, 5 March 2021**
- The deadline for call-ins is: **Friday, 12 March 2021**

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 previous page) by 5 pm the day before the meeting.

Cabinet

Wednesday, 3 March 2021

5.30 p.m.

- | | Pages |
|--|----------------|
| 1. APOLOGIES FOR ABSENCE | |
| To receive any apologies for absence. | |
| 2. DECLARATIONS OF DISCLOSABLE PECUNIARY INTERESTS AND OTHER INTERESTS | 13 - 14 |
| Members are reminded to consider the categories of interest, identified in the Code of Conduct for Members to determine; whether they have an interest in any agenda item and any action they should take. For further details, see the attached note from the Monitoring Officer. | |
| Members are also reminded to declare the nature of the interest at the earliest opportunity and the agenda item it relates to. Please note that ultimately it is the Members' responsibility to identify any interests and also update their register of interests form as required by the Code. | |
| If in doubt as to the nature of an interest, you are advised to seek advice prior to the meeting by contacting the Monitoring Officer or Democratic Services. | |
| 3. UNRESTRICTED MINUTES | 15 - 26 |
| The unrestricted minutes of the Cabinet meeting held on Wednesday 27 January 2021 are presented for approval. | |
| 4. ANNOUNCEMENTS (IF ANY) FROM THE MAYOR | |
| 5. OVERVIEW & SCRUTINY COMMITTEE | |
| 5.1 Chair's Advice of Key Issues or Questions | |
| Chair of Overview and Scrutiny Committee (OSC) to report on any issues raised by the OSC in relation to unrestricted business to be considered. | |
| 5.2 Any Unrestricted Decisions "Called in" by the Overview & Scrutiny Committee | |
| (Under provisions of Section 30, Rule 59 of the Constitution). | |



6. UNRESTRICTED REPORTS FOR CONSIDERATION

6.1	Idea Stores Post Consultation Report	27 - 94
	<p>Report Summary: This report gives information and results from the public consultation on Idea Stores and asks for a decision to be made on the possible changes to this service discussed in the public consultation.</p> <p>Wards: All Wards Lead Member: Cabinet Member for Culture, Arts and Brexit Corporate Priority: A borough that our residents are proud of and love to live in</p>	
6.2	Outcome of consultation on revised approach to day support in adult social care	95 - 168
	<p>Report Summary: This report will set out the outcome of a consultation on a new model of day support for adult social care and will seek approval on the final model. The report is a follow-up to the 28th October 2020 Cabinet report on day support. The October report described a new model with the following changes:</p> <ol style="list-style-type: none">1. To have fewer day centre service buildings overall2. To use day service buildings as community support hubs3. To help people who need adult social care to use a bigger range of daytime activities4. To support people to organise their own support through direct payments <p>These proposals include previously agreed savings of £317,000 per year from 2021-22 and proposes additional savings of £252,000 as part of the 2021-24 Medium-Term Financial Strategy.</p> <p>Public consultation on these proposals ran from 9 November 2020 to 4 January 2021. This item will describe the outcome of the consultation and will present final proposals for the future of day support in adult social care for agreement.</p> <p>As in the October report, there is a direct impact of these changes on the Council's in-house day centres for older and disabled people (Riverside and Physical Disability Day Opportunities) and for people who need mental health support (Pritchards Road).</p> <p>Wards: All Wards Lead Member: Deputy Mayor and Cabinet Member for Adults, Health and Wellbeing Corporate Priority: A borough that our residents are proud of and love to live in</p>	

6 .3 Bow bus gateway and timed closures exemptions considerations	To Follow
<p>Report Summary: The proposals for the Bow Liveable Streets project were presented to Cabinet on 25 November 2020, the following notes the decisions made and the purpose of this report. This item presents the considerations and recommendations for an exemption scheme in respect of vehicles belonging to blue badge holders and sets out the options for the operation of the Roman Road bus gateway and Coborn Road timed closure. This includes hours of operation and potential exemptions for local blue badge holders, carers and potentially other local groups</p>	
Wards:	Bow East; Bow West
Lead Member:	Cabinet Member for Environment and Public Realm (Job Share) - Lead on Environment, Cabinet Member for Environment and Public Realm (Job Share) - Lead on Public Realm
Corporate Priority:	A borough that our residents are proud of and love to live in

6 .4 Determination of Limehouse Neighbourhood Forum Application	169 - 258
<p>Report Summary: Neighbourhood forum designations expire five years after they are initially granted. The designation of the Limehouse Community Forum as the neighbourhood forum for the Limehouse Neighbourhood Planning Area therefore expired on 1 December 2020. The Forum has submitted an application to be re-designated. This report assesses the application against the relevant legislation and guidance.</p>	
Wards:	Spitalfields & Banglatown; Weavers
Lead Member:	Cabinet Member for Planning and Social Inclusion (Job Share) - Lead on Planning, Cabinet Member for Planning and Social Inclusion (Job Share) - Lead on Social Inclusion
Corporate Priority:	A borough that our residents are proud of and love to live in

6 .5 Determination of Spitalfields Neighbourhood Forum Application	259 - 306
<p>Report Summary: Neighbourhood forum designations expire five years after they are initially granted. The Spitalfields Neighbourhood Forum designation is therefore due to expire on 5 April 2021. The Forum has submitted an application for the designation to be renewed. This report assesses the application against the relevant legislation and guidance.</p>	
Wards:	Spitalfields & Banglatown; Weavers
Lead Member:	Cabinet Member for Planning and Social Inclusion (Job Share) - Lead on Planning, Cabinet Member for Planning and Social Inclusion (Job Share) - Lead on Social Inclusion
Corporate Priority:	A borough that our residents are proud of and love to live in

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6 .6 Report on the outcome of public representations received in response to the statutory Notice on the proposal to amalgamate Cubitt Town Infants and Junior Schools: Decision on Amalgamation of Cubitt Town Infants and Junior Schools • Decision on Clo **307 - 344**

Report Summary:

This report informs the council of the outcome of the four week period of public representation in response to the statutory notice on the proposal for the amalgamation (merger) of Cubitt Town Infants' and Cubitt Town Junior Schools from April 2022.

This would require the closure of Cubitt Town Infants School and extending the age range of Cubitt Town Junior School, to establish a 3FE entry, all-through 3-11 Primary School.

It recommends for the Mayor in cabinet to consider a decision on whether or not to formally proceed with plans for the schools' merger that would take effect from the 1st April 2022. Cubitt Town Infants School would therefore officially close on 31st March 2022

The report includes a summary of representations received and any responses made; risk and opportunities; officer's recommendations; decisions available to the Mayor in Cabinet.

Wards: All Wards
Lead Member: Cabinet Member for Housing
Corporate Priority: TH Plan 1: A better deal for children and young people: aspiration, education and skills

6 .7 Report on the outcome of public representations received in response to the statutory proposal to close Cherry Trees Special School: Decision on Closure of Cherry Trees Special School. **345 - 390**

Report Summary:

This report presents the outcome of the four week period of public representation in response to the statutory notice on the proposal to close Cherry Trees Special School.

It recommends for the Mayor in cabinet to consider a decision on whether or not to formally proceed with plans for Cherry Trees Special School to officially close on 31st August 2021

The report includes a summary of representations received and any responses made; risk and opportunities; officer's recommendations; decisions available to the Mayor in Cabinet.

Wards: All Wards
Lead Member: Cabinet Member for Housing
Corporate Priority: TH Plan 1: A better deal for children and young people: aspiration, education and skills



6 .8 Report on the outcome of public representations received in response to the statutory proposal to close Shapla Primary School: Decision on Closure of Shapla Primary School. 391 - 458

Report Summary:

This report informs the council of the outcome of the four week period of public representation in response to the statutory notice on the proposal to close Shapla Primary School.

It recommends for the Mayor in cabinet to consider a decision on whether or not to formally proceed with plans for Shapla Primary School to officially close on 31st August 2021

The report includes a summary of representations received and any responses made; risk and opportunities; officer's recommendations; decisions available to the Mayor in Cabinet.

Wards: All Wards
Lead Member: Cabinet Member for Housing
Corporate Priority: TH Plan 1: A better deal for children and young people: aspiration, education and skills

6 .9 Report on the outcome of public representations received in response to the statutory proposal to close St Matthias Primary School: Decision on Closure of St Matthias Primary School. 459 - 522

Report Summary:

This report informs the council of the outcome of the four week period of public representation in response to the statutory notice on the proposal to close St Matthias Primary School.

It recommends for the Mayor in cabinet to consider a decision on whether or not to formally proceed with plans for St Matthias Primary School to officially close on 31st August 2021

The report includes a summary of representations received and any responses made; risk and opportunities; officer's recommendations; decisions available to the Mayor in Cabinet.

Wards: All Wards
Lead Member: Cabinet Member for Housing
Corporate Priority: TH Plan 1: A better deal for children and young people: aspiration, education and skills



Report Summary:

As part of the Borough SEN Strategy and Implementation Plan for Social, Emotional and Mental Health Primary provision, Bowden House Special School and Ben Jonson Primary Schools have formed a partnership to jointly run a Social Emotional Mental Health provision, on the Ben Jonson site. This partnership would enhance the educational offer for both schools and benefit all Tower Hamlets children with SEMH needs.

This report presents the outcome of the stage one consultation, and the public representations received in response to the statutory Notice on the proposal to establish a 12 place Social, Emotional and Mental Health (SEMH) provision at Ben Jonson School from September 2021
It also presents the outcome of the public representation received in response to the statutory notice on the proposal for a prescribed alteration to Bowden House School and Ben Jonson School, to establish a 12 place Special Educational Needs provision from September 2021.

The report explains the background and reasons for the proposals; the links with the possible closure of Cherry Trees School. It details the consultations undertaken; the responses received with the views of parents, pupils, staff and the general public. It recommends for the Mayor in Cabinet to consider the decision on whether or not the council should agree the proposal and formally proceed with plans to establish a 12 place Social, Emotional and Mental Health (SEMH) provision at Ben Jonson School from 1st September 2021, and the prescribed alteration to Bowden House School, to establish a 12 place co-educational, primary, non-residential, Special Educational Needs provision from September 2021 on the Ben Jonson site. The two provisions will be integrated.

The report will include equalities impact assessment; risk and opportunities; officer's recommendations; decisions available to the Mayor in Cabinet.

Wards: All Wards
Lead Member: Cabinet Member for Housing
Corporate Priority: TH Plan 1: A better deal for children and young people: aspiration, education and skills



Report Summary:

This item provides an overview of Tower Hamlets Community Safety Partnership (CSP) Plan 2021-2024. The CSP Plan presents the Community Safety Partnership's approach and priorities to achieving a reduction in crime and anti-social behaviour in Tower Hamlets up to 2023.

The new CSP plan is supported by a comprehensive strategic assessment that draws on data from across the partnership to identify trends, patterns, and drivers relating to crime and anti-social behaviour. It has also been informed by extensive consultation and engagement with partners across the system, with community groups, and with Tower Hamlets residents.

Wards: All Wards
Lead Member: Deputy Mayor for Children, Youth Services and Education
Corporate Priority: A borough that our residents are proud of and love to live in

6 .12 Budget monitoring report 2020-21 as at 31st December 2020 (period 9)

Report Summary:

Budget monitoring report 2020-21 as at 31st December 2020 (period 9)

Wards: All Wards
Lead Member: Cabinet Member for Resources and the Voluntary Sector
Corporate Priority: A borough that our residents are proud of and love to live in

6 .13 Strategic performance and delivery reporting – Q3 2020/21

Report Summary:

This report provides the Mayor in Cabinet with an update on the delivery and implementation of the council's Strategic Plan.

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

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 Section 30, Rule 59 of the Constitution).

11. EXEMPT / CONFIDENTIAL REPORTS FOR CONSIDERATION

Nil items.

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

Next Meeting of the Committee:

Wednesday, 24 March 2021 at 5.30 p.m. in C1, 1st Floor, Town Hall, Mulberry Place, 5 Clove Crescent, London, E14 2BG

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Town Hall
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Agenda Item 2

DECLARATIONS OF INTERESTS AT MEETINGS– NOTE FROM THE MONITORING OFFICER

This note is for guidance only. For further details please consult the Code of Conduct for Members at Part C, Section 31 of the Council's Constitution

(i) Disclosable Pecuniary Interests (DPI)

You have a DPI in any item of business on the agenda where it relates to the categories listed in **Appendix A** to this guidance. Please note that a DPI includes: (i) Your own relevant interests; (ii) Those of your spouse or civil partner; (iii) A person with whom the Member is living as husband/wife/civil partners. Other individuals, e.g. Children, siblings and flatmates do not need to be considered. Failure to disclose or register a DPI (within 28 days) is a criminal offence.

Members with a DPI, (unless granted a dispensation) must not seek to improperly influence the decision, must declare the nature of the interest and leave the meeting room (including the public gallery) during the consideration and decision on the item – unless exercising their right to address the Committee.

DPI Dispensations and Sensitive Interests. In certain circumstances, Members may make a request to the Monitoring Officer for a dispensation or for an interest to be treated as sensitive.

(ii) Non - DPI Interests that the Council has decided should be registered – (Non - DPIs)

You will have 'Non DPI Interest' in any item on the agenda, where it relates to (i) the offer of gifts or hospitality, (with an estimated value of at least £25) (ii) Council Appointments or nominations to bodies (iii) Membership of any body exercising a function of a public nature, a charitable purpose or aimed at influencing public opinion.

Members must declare the nature of the interest, but may stay in the meeting room and participate in the consideration of the matter and vote on it **unless:**

- A reasonable person would think that your interest is so significant that it would be likely to impair your judgement of the public interest. **If so, you must withdraw and take no part in the consideration or discussion of the matter.**

(iii) Declarations of Interests not included in the Register of Members' Interest.

Occasions may arise where a matter under consideration would, or would be likely to, **affect the wellbeing of you, your family, or close associate(s) more than it would anyone else living in the local area** but which is not required to be included in the Register of Members' Interests. In such matters, Members must consider the information set out in paragraph (ii) above regarding Non DPI - interests and apply the test, set out in this paragraph.

Guidance on Predetermination and Bias

Member's attention is drawn to the guidance on predetermination and bias, particularly the need to consider the merits of the case with an open mind, as set out in the Planning and Licensing Codes of Conduct, (Part C, Section 34 and 35 of the Constitution). For further advice on the possibility of bias or predetermination, you are advised to seek advice prior to the meeting.

Section 106 of the Local Government Finance Act, 1992 - Declarations which restrict Members in Council Tax arrears, for at least a two months from voting

In such circumstances the member may not vote on any reports and motions with respect to the matter.

Further Advice contact: Janet Fasan, Director of Legal and Interim 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	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. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
Contracts	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— (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged.
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	Any tenancy where (to the Member's knowledge)— (a) the landlord is the relevant authority; and (b) the tenant is a body in which the relevant person has a beneficial interest.
Securities	Any beneficial interest in securities of a body where— (a) that body (to the Member's knowledge) has a place of business or land in the area of the relevant authority; and (b) either— (i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or (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.

LONDON BOROUGH OF TOWER HAMLETS

MINUTES OF THE CABINET

HELD AT 5.33 P.M. ON WEDNESDAY, 27 JANUARY 2021

ONLINE 'VIRTUAL' MEETING - [HTTPS://TOWERHAMLETS.PUBLIC-I.TV/CORE/PORTAL/HOME](https://towerhamlets.public-i.tv/core/portal/home)

Members Present:

Mayor John Biggs	
Councillor Rachel Blake	(Deputy Mayor and Cabinet Member for Adults, Health and Wellbeing)
Councillor Asma Begum	(Deputy Mayor and Cabinet Member for Children, Youth Services and Education)
Councillor Sabina Akhtar	(Cabinet Member for Culture, Arts and Brexit)
Councillor Danny Hassell	(Cabinet Member for Housing)
Councillor Candida Ronald	(Cabinet Member for Resources and the Voluntary Sector)
Councillor Motin Uz-Zaman	(Cabinet Member for Work and Economic Growth)
Councillor Mufeedah Bustin	Cabinet Member for Planning and Social Inclusion (Job Share) - Lead on Social Inclusion
Councillor Asma Islam	Cabinet Member for Environment and Public Realm (Job Share) - Lead on Environment
Councillor Eve McQuillan	Cabinet Member for Planning and Social Inclusion (Job Share) - Lead on Planning

Other Councillors Present:

Councillor Peter Golds	(Leader of the Conservative Group)
Councillor James King	

Apologies:

Councillor Sirajul Islam	(Statutory Deputy Mayor for Community Safety, Faith and Equalities)
Councillor Dan Tomlinson	Cabinet Member for Environment and Public Realm (Job Share) - Lead on Public Realm

Officers Present:

Jane Abraham	(Housing Project Manager)
Zamil Ahmed	(Head of Procurement)
Allister Bannin	(Head of Strategic and Corporate Finance)
Kevin Bartle	(Interim Corporate Director, Resources)
Adam Boey	(Senior Strategy & Policy Manager - Corporate)
Stephen Bramah	(Deputy Head of the Mayor's office)
David Courcoux	(Head of the Mayor's Office)
Janet Fasan	(Divisional Director, Legal, Governance)
Sharon Godman	(Divisional Director, Strategy, Policy and

Tracey St Hill	Performance)
Marion Kelly	(Principal RSL Partnerships Officer)
Denise Radley	(Finance Improvement Team - Programme Director)
Melanie Rose	(Corporate Director, Health, Adults & Community)
Judith St John	(Head of IT Office)
Ann Sutcliffe	(Divisional Director, Sports, Leisure and Culture)
James Thomas	(Corporate Director, Place)
Will Tuckley	(Corporate Director, Children and Culture)
Matthew Mannion	(Chief Executive)
Patricia Attawia	(Head of Democratic Services, Governance)
	(Democratic Services Team Leader, Civic & Members, Governance)

1. APOLOGIES FOR ABSENCE

Apologies for absence were received on behalf of:

- Councillor Sirajul Islam (Statutory Deputy Mayor and Cabinet Member for Housing)
- Councillor Dan Tomlinson (Cabinet Member for Environment and Public Realm (Job Share) - Lead on Public Realm)

2. DECLARATIONS OF DISCLOSABLE PECUNIARY INTERESTS AND OTHER INTERESTS

There were no Declarations of Disclosable Pecuniary Interests.

3. UNRESTRICTED MINUTES

RESOLVED

1. That the unrestricted minutes of the Cabinet meeting held on Wednesday 6 January 2021 be approved and signed by the Chair as a correct record of proceedings.

4. ANNOUNCEMENTS (IF ANY) FROM THE MAYOR

The **Mayor** made three announcements.

- Today was Holocaust Memorial Day. As the Council was unable to undertake the usual ceremonies, video messages had been circulated and publicised. The theme this year is 'be the light in the darkness'. The Council was also working with partners to deliver activities and events. He noted how the borough has been a place of refuge for many peoples over the years and so it was important that these events were remembered and commemorated here.
- He provided an updated on the Covid-19 pandemic and in particular the impact on the borough. He thanked everyone who is following the rules and those who were supporting residents during these challenging times. As a community we need to work together.

- He noted that a reshuffle of Cabinet Members would be coming into effect from tomorrow, Thursday 28 January 2021. The details would be circulated to Members and posted on the website.

5. OVERVIEW & SCRUTINY COMMITTEE

5.1 Chair's Advice of Key Issues or Questions

Pre-Decision Scrutiny Questions and officer responses were tabled in relation to Agenda Items:

- 6.1 The Council's 2021-22 Budget Report and Medium Term Financial Strategy 2021-24
- 6.3 Procurement of the Leisure Management Contract

These were considered during discussion of the relevant agenda items.

In addition, Councillor James King, Chair of the Overview and Scrutiny Committee, also provided an update on their meeting the previous Monday. He reported that they had discussed a number of issues including:

- They had a Covid-19 update from the Director of Public Health which was really helpful. They noted the challenge in vaccine take-up within some BAME communities.
- The Borough Commander came along for a spotlight session and there was a discussion about problems with Anti-Social Behaviour, drugs and similar issues within the borough. They also looked at the numbers of local police officers and how they were being deployed.
- He also took Cabinet through the draft recommendations the Committee had prepared in relation to their review of the Administrations budget proposals.

The **Mayor** thanked Councillor King for his update.

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

Nil items.

6. UNRESTRICTED REPORTS FOR CONSIDERATION

6.1 The Council's 2021-22 Budget Report and Medium Term Financial Strategy 2021-24

The **Mayor** introduced the Administrations budget proposals and medium-term financial strategy. He noted the comments received to date in response to the draft budget proposals. In particular he highlighted how important it was to use reserves prudently as they could only be spent once. The Council was in a very challenging financial situation and the Council also had to deal with increasing demands on services especially around adult and children's social care and related support. The Covid-19 pandemic had also impacted

significantly and had to be factored into the calculations. These were problems that other Councils were also having to deal with.

However, he highlighted that the administration were committed to doing everything they could to support the vulnerable within the community and the budget set out the best way forward for the Council and its services in the circumstances.

Finally, the Mayor noted updates to the draft budget presented at an earlier meeting which were around greater detail added to the Schools and Education budget, more information around the Housing Revenue Account and also the new details on the Capital Programme.

Councillor Candida Ronald, Cabinet Member for Resources and the Voluntary Sector, took Cabinet through the report in more detail including looking at both revenue and capital budgets and individual proposals. She spoke about the uncertainty caused by the Covid-19 pandemic and that there had already been a negative impact on the Council's income and expenditure. She welcomed the funding the government had provided but noted that it was still uncertain in a number of areas the exact funding available. She also highlighted a number of other issues such as slippage in achieving agreed savings, use of resources and the need to tackle new challenges as they appeared.

The report was then opened up to discussion and the meeting heard from a number of participants raising a number of issues and points including:

- Details of new proposes Capital Spending including on bridges over the River Lea.
- The significant reduction in the Council's revenue reserves and risks around business rate collection and office accommodation.
- Hearing from local petitioners who were concerned about changes to specialist day centre services.
- The issues that the Overview and Scrutiny Committee were considering including the pre-decision scrutiny questions and officer responses.
- The Council's capital plans including around securing social housing units.
- Challenges around anti-social behaviour especially around Shoreditch.

It was noted that the final Overview and Scrutiny Committee (OSC) response to the draft budget would be submitted after the final OSC meeting next week and that the Executive would consider those recommendations before submitting the final budget proposals to Council for consideration. It was also noted that some housekeeping changes may be required which were delegated to the Interim Corporate Director, Resources.

The **Mayor** proposed that the budget proposals should be forwarded to Council without amendment at this stage. This was **agreed** without dissent and so it was:

RESOLVED

1. To agree to propose a General Fund Revenue Requirement of £386.141m subject to any remaining changes arising from the final Local Government Finance Settlement.
2. To agree to propose a Band D Council Tax of £113.26 (Council Share) 2021-22 to full Council for approval.
3. To agree that the Interim Corporate Director, Resources, after consultation with the Mayor and Lead Member for Resources, may make any changes required to the budget following the final settlement announcement.
4. To agree to propose the 2021-22 transfers to and from reserves as set out in paragraph 3.9.12 of the report.
5. To agree to proposal to continue the £1 million funding from the Public Health grant to the Key Stage Two extension of Free School Meals.
6. To approve the proposed £2.974m one-off increase in the Social Care Support Grant for 2021-22 is allocated in full directly as budget to the services (75% to adult social care, £2.230m, and 25% to children's social care £0.744m).
7. To approve the proposed £0.746m increase in the Homelessness Prevention Grant is allocated in full to the Place directorate to support homelessness in the borough.
8. To agree to propose the three-year General Fund Capital Programme 2021-24 as set out in Appendix 8 to the report, totalling £395.471m.
9. To approve the budget allocation for the newly listed schemes in the programme, subject to sign off through the capital governance process and agreement to proceed given by the Corporate Director of Place in consultation with the Corporate Director of Resources and that schemes funded by future capital receipts, s106 and/or CIL will not go ahead until such funds have been securely received.
10. To approve delegated authority to the Corporate Director of Place in consultation with the Corporate Director of Resources for all activities required to deliver the capital programme e.g. go out to tender, appoint consultants and contractors in accordance with the Procurement Procedures, acquire land interests, appropriate land from the General Fund to the Housing Revenue Account (HRA) for the delivery of new council homes, subject to approved budget.
11. To approve the following specific recommendations subject to the agreement of the budget Council meeting if/where required:

- i. Approve the 2020-21 spend on IT projects, of which £7.020m to be funded from revenue reserve; and
 - ii. Approve the disposal of assets, as set out in Appendix 8F to the report, subject to sign off through the capital governance process and agreement to proceed given by the Corporate Director of Place and Corporate Director of Resources.
12. To approve the principle that when capital receipts are achieved in year that they replace borrowing in future years.
 13. To approve the inclusion of the George Green School within the General Fund Capital Programme 2021-24 totalling £51.400m.
 14. To note the development of the medium term and long-term Prioritisation and Financing Delivery Plan for Infrastructure (PFDP) identifying priorities for 2023 to 2030.
 15. To agree to propose the 3-year Housing Revenue Account Capital Programme 2021-24 as set out in Appendix 8E totalling £231.095m.
 16. To agree to propose the 2021-22 Housing Revenue Account budget as set out in Appendix 7 to the report.
 17. To approve the 2021-22 Management Fee payable to Tower Hamlets Homes (THH) of £32.615m as set out in paragraph 3.11.11 of the report.
 18. To note that under the Management Agreement between the Council and THH, THH manages delegated HRA income and expenditure budgets on behalf of the Council. In 2021-22, THH will manage delegated income budgets totalling £93.942m and delegated expenditure budgets totalling £61.311m.
 19. To agree to propose the 2021-22 Dedicated Schools Budget.
 20. To agree that the National Schools Funding Formula (NSFF) adopted by Tower Hamlets originally in 2019-20 continues for 2021-22. The only changes included are increases to the factor values in line with the NSFF, the inclusion of pay and pension grant allocations and a minor change to the funding allocated to schools with split sites.
 21. To agree that the Minimum Funding Guarantee (the mechanism that guarantees schools a minimum uplift in per-pupil funding) is set at 2.0%, the maximum allowed.
 22. To agree that the structure of the Early Years Funding Formula remains unchanged except that the two-year-old hourly rates will increase in line with the Early Years National Funding Formula.

23. To note that the Local Council Tax Reduction Scheme will remain unchanged for 2021-22.

24. To note the Equalities Impact Assessment and specific equalities considerations as set out in Section 4 of the report.

6.2 Fees and Charges 2021-22

The **Mayor** introduced the report proposing the Council's set of fees and charges for 2021-22. He highlighted that the report was the same as the one presented earlier in the month except a freeze on lettings charges at community hubs. The **Mayor** then moved the recommendations as set out and these were **agreed** without dissent. It was:

RESOLVED

1. To approve the proposed changes to discretionary fees and charges as detailed in the appendices, with effect from 1st April 2021, subject to the conditions set out in Recommendation 4.
2. To approve new discretionary fees and charges as detailed in the appendices, with effect from 1st April 2021, subject to the conditions set out in Recommendation 4.
3. To note the revised statutory fees and charges as detailed in Appendix 6 to the report.
4. To note the Equalities Implications as set out in Section 4 of the report and that, where it is highlighted in section 4.5 of the report that a proposed fee or charge requires a full Equality Impact Analysis (EIA), this EIA will be undertaken prior to the introduction of the change to the respective fee or charge.
5. To approve delegation for amendments to fees and charges, including those to take account of the result of EIAs, to the relevant Corporate Director in liaison with the Lead Member and the Mayor.

6.3 Procurement of the Leisure Management Contract

Councillor Sabina Akhtar, Cabinet Member for Culture, Arts and Brexit, introduced the report on procurement of the Council's Leisure Management Contract. She explained that the contract was due to expire in April 2020. However, leisure centres have been severely impacted by the Covid-19 pandemic. It is therefore appropriate to extend the existing contract to give time to deal with the issues created by the pandemic and to allow a proper re-tendering process to take place. There will be opportunities for Members to shape the new contract as that is prepared.

The Pre-Decision Scrutiny Questions and officer responses and the exempt appendices (Exempted due to Paragraph 3 – the financial affairs of the authority) were noted.

During discussion it was noted that the way the contract was being extended it meant that GLL would be required to pay back the management fee by the end of the contract period.

The **Mayor** welcomed the report and noted the detailed work that had been undertaken to work out the best solution given the pandemic related closure of leisure centres and the implications of that. He proposed the recommendations as set out and these were **agreed** without dissent. It was:

RESOLVED

1. To authorise the Corporate Director Children and Culture to Extend the existing leisure management contract (LMC) and the Poplar Baths leisure services contract by two years each to 2024. This extension will allow the leisure market to stabilise and give GLL additional time to repay the management fee to the Council
2. To authorise the Corporate Director Children and Culture in consultation with the Corporate Director Place to extend the leisure centre leases.
3. To note the financial information regarding the leisure portfolio in Appendix 1 to the report.
4. To authorise the Corporate Director Children and Culture to begin preparatory work for the re-procurement of the leisure management contract, including the Poplar Baths Leisure Services and that a further report be brought to Cabinet setting out the options for the procurement in due course.
5. To note that an Equalities Impact Assessment has not been completed as yet because the procurement planning has not begun at this stage.
6. To authorise the execution of any agreements necessary to give effect to the recommendations.

6.4 George Green's Almshouses - Transfer of RTB grant to new Charitable Incorporated Organisation

The **Mayor** introduced the report on George Green's Almshouses. He highlighted that this was a technical report to adjust previous agreements following the reconstitution of the George Green Almshouses organisation.

He moved the recommendations as set out and they were **agreed** without dissent. It was:

RESOLVED

1. To authorise the Corporate Director Place to approve the transfer of the original grant payments to the reconstituted organisation.
2. To authorise the Corporate Director Place to instruct Legal Services to execute any legal documentation required to give effect to the purpose of this report
3. To note the specific equalities considerations as set out in Paragraph 4.1 of the report.

6.5 Approval of extension to existing Servelec contract and SaaS hosting arrangement

Councillor Candida Ronald, Cabinet Member for Resources and the Voluntary Sector introduced the report. She explained that it related to the Mosaic software used in social care services. The proposal was to extend two contracts relating to this for a two-year period.

The **Mayor** welcomed the report and noted the intention to continue to use digital tools to improve the efficiency and effectiveness of council services. He moved the recommendations as set out and they were **agreed** without dissent. It was:

RESOLVED

1. To agree to waive the constitutional requirement to go out to market and utilise the extension to the existing contract with Servelec.
2. To authorise the Corporate Director, Resources to approve the execution of all necessary agreements to give effect to recommendation 1.

6.6 Contracts Forward Plan 2020/21 – Quarter Three

Councillor Candida Ronald, Cabinet Member for Resources and the Voluntary Sector introduced the report. She highlighted the wide variety of issues that the Council got involved in such as broadband, anti-social behaviour and use of barristers.

The **Mayor** welcomed the report and thanked officers for their work. He confirmed that all projects listed could proceed to contract award after tender. He also noted the procurement forward plan as set out. These proposals were **agreed** without dissent and it was:

RESOLVED

1. To note the contracts set out in Appendix 1 to the report.
2. Confirm that all listed contracts 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 2020-22 detailed in Appendix 2 to the report.

6.7 Nominations to outside bodies

The **Mayor** introduced the report proposing that Councillor Motin Uz-Zaman be nominated to the board of the Bethnal Green Business Development Centre. He put that proposal to the meeting and it was **agreed** without dissent that:

RESOLVED

1. To agree the nomination of Councillor Motin Uz-Zaman to the Bethnal Green Business Centre.

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. EXEMPT / CONFIDENTIAL REPORTS FOR CONSIDERATION

Nil items.

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

Nil items.

The meeting ended at 7.04 p.m.

MAYOR JOHN BIGGS

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<p>Cabinet</p> <p>3 March 2021</p>	
<p>Report of: Ann Sutcliffe, Corporate Director Place Directorate, Corporate Property and Capital</p>	<p>Classification: Unrestricted</p>
<p>Revised approach to Idea Stores & Library Service</p>	

Lead Member	Councillor Sabina Akhtar, Cabinet Member for Culture, Arts and Brexit
Originating Officer(s)	Teresa Heaney, Interim Divisional Director Customer Programme
Wards affected	All wards
Key Decision?	Yes
Forward Plan Notice Published	
Reason for Key Decision	Impact on Wards
Strategic Plan Priority / Outcome	<p>Priority Three: Outcome 9 – People say we are open and transparent putting residents at the heart of everything we do Outcome 11 – People say we continuously seek innovation and strive for excellence to embed a culture of sustainable improvement</p>

Executive Summary

Following the proposal presented at the Cabinet Meeting on 28th October 2020 we have undertaken a consultation with the public on the future of our Idea Store and Library Service. Nationally since 2010 hundreds of libraries have closed nationally and despite budget pressures Tower Hamlets has retained and invested in the service.

The original proposals contained within the October 2020 report were developed out of our continuing commitment to deliver a rich and robust service offer across the borough whilst also achieving a saving. Our approach was to ensure that longer opening hours and a broad service offer continued at our four main sites (which offer a good geographical spread across the borough) and that any service reductions should be made at our least visited sites and/or where there was another site within a relatively short distance.

Whilst this principle is still sound and based on providing a balanced service (i.e. that we should focus on our four main sites), we have listened to what residents and stakeholders said and propose to adjust our proposals so that:

- some opening hours are maintained at Cubitt Town Library until such time as both sites on the Isle of Dogs (IS Canary Wharf is currently the main site) can be replaced by a new, more centrally located Idea Store
- The reduction in hours at Bethnal Green Library (and to a lesser extent at IS Watney Market) is smaller, and that hours are concentrated into 'whole days' so that we can meet the needs of those who use the venues at different times of the day (particularly that they would be open for study in the after school period).

The process of public consultation and engagement gave us valuable additional insight into how much residents value Idea Stores and the way they bring together library and adult learning services alongside digital hubs and a 'third space' that allows residents to meet in informal ways. It also showed that for a minority, the quieter spaces in our two libraries offer a valued environment. The strength of these views are particularly notable given the limited access (likely to continue for some time) engendered by the Pandemic.

There was real concern about the impact of the proposals on children and young people in particular, and a definite concern that the impact of Covid on the economy, jobs, young people, and the community as a whole will mean that Idea Stores will be more necessary than ever going forward.

Residents expressed strong views that we should avoid closing Cubitt Town Library completely even if we could only continue to provide very limited hours or had to provide this by reducing some hours at IS Canary Wharf. There was also a lot of feedback about opening hours at the other two sites not being suitable for all, especially if they were only to open for mornings or afternoon sessions.

However, the changes to the way residents use our services and the financial imperative that led to the proposal in the original cabinet paper remain. The revised proposal we have developed can still deliver the £1M existing savings and the £600K new proposed saving associated with the original proposal.

Recommendations:

The Cabinet is recommended to:

1. Consider the results of the public consultation and other feedback received.
2. Approve the revised proposal as set out in the report below.

1 REASONS FOR THE DECISIONS

- 1.1 The shift in resident behaviour (pre-Covid) towards using self-service machines and other digital options mean our overall staffing requirement has reduced.
- 1.2 Furthermore, the pandemic has changed the Idea Stores service and the way it is delivered; accelerating the change in the way that residents choose to interact with us.
- 1.3 We are facing significant financial pressures, which have only worsened due to Covid.
- 1.4 We need not only to deliver savings that are already planned, but to offer options that would support the council to meet the additional financial challenge.
- 1.5 We have been able to develop the revised proposal mainly through careful use of timetables. We are therefore asking that the revised proposal be approved as set out below as there is very little flexibility about the times and days of sessions at Cubitt Town Library, Bethnal Green Library or IS Watney Market. Any additional changes are likely to reduce the saving we can deliver.

2 ALTERNATIVE OPTIONS

- 2.1 Keep services unchanged. This would result in a smaller staff restructure that would deliver approx. £600K and result in an additional budget pressure of £1M for the organisation (Not Recommended)
- 2.2 Deliver a total of £1.6M by proceeding with the proposal that came to Cabinet in October 2020 and which was set out as Option 1 in the public consultation
- 2.3 Based on feedback from residents develop a new option based on the above, but which allows us to keep some hours at Cubitt Town Library (CTL) and improve the opening times and hours at Bethnal Green Library (BGL) and Idea Store Watney Market (ISWM) but still delivers the saving.
- 2.4 A number of consultation responses highlighted the lack of any proposed weekend opening at BGL and CTL. Expanding the revised proposal to also include opening BGL and CTL for 8 hours a day on Saturdays would require a reduction of the savings target of £100k

3 DETAILS OF THE REPORT

Existing Service

- 3.1 Idea Store (IS) is Tower Hamlets Council's unique offer of integrated library, adult learning and information services. Created in 2002 in response to the lowest participation and satisfaction levels in libraries in London, Idea Store quickly became an icon for innovative services that are loved by the Tower Hamlet's community and admired nationally and internationally. There are five Idea Stores, strategically located in the highest footfall areas in the borough, and two Libraries. As well as a very strong, modern library offer, customers can also enjoy 800+ courses for adults and families, book groups, art exhibitions, cultural celebrations, under 5s and 50+ sessions, access to the Council's online services and much more. The Idea Store concept is now widely recognised as best practice in social cohesion in a diverse community
- 3.2 Idea Stores have gone against the national trend of chronic decline, and library visits in Tower Hamlets have quadrupled. Last year we saw nearly 2,000,000 visits, the fourth highest in London. Participation in adult learning has doubled (8,000 yearly enrolments) and access to online services has also seen a substantial increase. Satisfaction levels are now on a par with the best library services in the UK, and the Idea Store innovation ethos is being maintained during the pandemic, with a number of activities and initiatives that ensure local residents continue to receive excellent library, learning and information services
- 3.3 We continue to innovate and significant change has been delivered over the last two years; adoption of the self-service machines and the implementation of online course registration have, in particular, reduced the number of full time equivalent posts needed to run the service safely
- 3.4 Given the size of Tower Hamlets, our service compares relatively well to other boroughs across the board and particularly in terms of the number of public access PCs available and residents' uptake of downloadable e-resources such as e-Books and magazines and audio books
- 3.5 During the unavoidable closure of sites due to Covid-19, the IS Service successfully shifted some of its delivery. The service has seen over 6,000 new members join since the end of March 2020 and a significant increase in online activity (see table below). Whilst many groups are still unable to meet physically, we have been delivering Storytime, conversation groups and book clubs via other means since early summer.

Digital Service	January 2019 - December 2019	January 2020 - December 2020	Percentage change
eAudio books	22,711 downloads	32,430 downloads	42%
eBooks	42,837 downloads	55,821 downloads	30%
Ancestry	28,870 searches	51,119 searches	77%

Britannica Encyclopaedia	378 sessions, 36,182 hits	449 sessions, 55,798 hits	18%
Go Citizen	68 sign ups	64 sign ups	-5%
Oxford Art Encyclopaedia	6 sessions	19 sessions	200%
Oxford Music Encyclopaedia	40 sessions	64 sessions	60%
Oxford English Dictionary	1724 sessions	2596 sessions	50%
Oxford Dictionaries	153 sessions	440 sessions	187%
Oxford Dictionary National Biography	125 sessions	131 sessions	4%
Oxford Reference Encyclopaedia	203 sessions	270 sessions	33%
Rbdigital Magazines	98,064 check outs	113,846 check outs	16%
PressReader newspapers	187,784 articles read	1,688,476 articles read	799%
Freegal music	13,628 downloads	12,940 downloads	-5%
RBdigital Comics	510 check outs	693 check outs	35%
Great Courses	1042 views	3023 views	190%
Stingrey Qello Live music & documentaries	452 views	535 views	18%

- 3.6 Four IS sites (Whitechapel, Crisp Street Bow & Canary Wharf) are currently open, but services are limited ordering books for collection at the door, and access to a limited number of bookable PCs. Adult Learning is currently limited to online classes only.
- 3.7 Two of our sites ISWM and BGL are currently deployed to support the NHS in its efforts to combat the pandemic and this is likely to continue for some months.

Public Consultation

- 3.8 Our period of consultation ran from 30th November 2020 to 29th January 2021. During this period, we heard from residents, interest groups, young people, members, unions, and others. It is clear that people feel passionately about the Idea Store Service and that whilst many understood the need to make a saving, a significant number felt the local proposals, particularly those that affected Cubit Town Library and Bethnal Green Library, went too far. We have listened to this feedback and made some significant amendments to our original proposal.
- 3.9 It should be noted however that in finding a way to respond feedback but still deliver savings, we have used up the flexibility in the rotas. It is very unlikely that we will be able to accommodate any changes in days or opening hours at the various sites without reducing the level of saving we can make.
- 3.10 Consultation Process - We consulted and engaged in the following ways:

- We published papers & a questionnaire on the council's Consultation Hub. This was primarily available online, but hard copies could be accessed via the idea stores and those without connectivity were able to choose to complete it over the phone
- We led 3 focus groups (2 general and 1 with ESOL Learners) in order to get more insight into the impact of the potential options
- We engaged with adult learners from our classes
- We received some direct communications including a video from one of the borough's scout groups
- We attended a Challenge session with scrutiny members, members of the youth council and a representative of a VCS
- There was also a public meeting led by unions and a petition is currently circulating.

3.11 Survey Responses

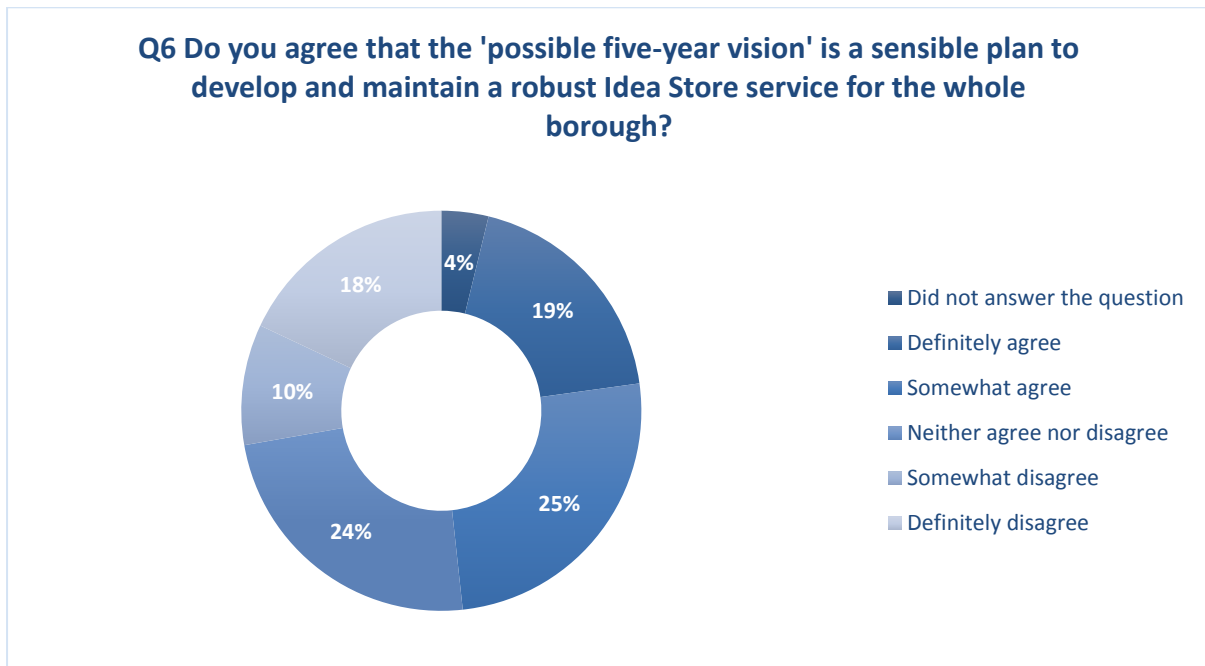
- We received 799 responses to the survey (789 after duplicates removed)
- 95% of responses came from individuals and again 95% of responders said they were IS members
- 84% identified as using the service regularly (once a month or more frequently)
- Most people who responded to the survey use more than one Idea Store or library. However, the proportion who use CTL BGL & ISWM was disproportionately high (e.g. 32% of responders identified CTL as one of the sites they visit but in 2019/20 only 2% of visits were actually at CTL).

A full report on the responses to the survey can be provided on request, however a high-level overview is given below.

3.12 Did People Agree or Disagree with the proposals?

- The highest-level question we asked was whether people agreed with the five-year vision that we set out (see 3.24 for details of what this

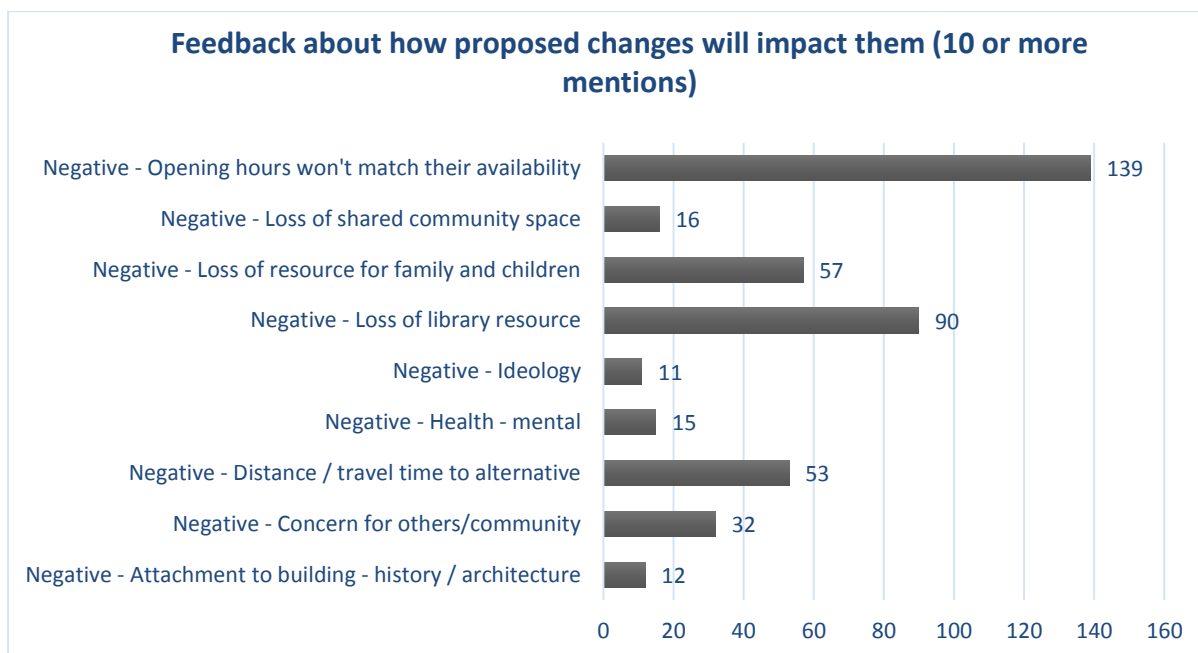
was). Most people either agreed with or were ambivalent towards this as you can see in the chart below:



3.13 Responses to the proposed options

- 303 responders agreed with Option 1 and 126 responders agreed with Option 2. Of the 429 total agrees, 80 responders agreed with both Option 1 and Option 2. Leaving 349 responders who agreed to one or more of the options (44.2 per cent)
- Taking into account responders who were ambivalent (they answered nether agree nor disagree). 585 responders agreed with or were ambivalent to Option 1 or Option 2. There were 160 responders who responded the same to both questions leaving 425 responders who agreed / were indifferent to one or more of the options (53.8%)
- The above strongly suggests that most people preferred option 1 to option 2. However, it also indicates that a significant proportion of people (46.2%) disagreed with both options.

3.14 514 (65.1%) responders said that if we were to implement Option 1, it would impact them. We asked them to describe how it would impact them if it did and the responses we received loosely break down as follows



3.15 In respect of the proposal to close Cubitt Town Library

- 62 per cent of responders said no, they did not agree with the proposal
- 38 per cent said yes
- (of the 187 responders who said they used CTL regularly 93% said no, they did not agree with the proposal. 7% said yes).

3.16 In respect of the proposals to reduce hours at (or close) Bethnal Green Library

- 47.7 per cent of responders said 'I think there is a better alternative'
- 44.5 per cent opted for reduced hours as described in option 1
- 7.9 per cent said it should close
- (of the 158 responders who said they use BGL regularly, 81% said 'I think there is a better alternative'; 2.5% said the library should close; and 16.5% said the library should reduce its hours from 50 to 15 hours per week.

3.17 In respect of the proposals to reduce hours at (or close) Idea Store Watney Market

- 50.1 per cent of responders said we should reduce floorspace and opening times as described in option 1
- 42.7 per cent said I think there's a better alternative, and
- 7.2 per cent said I think Watney Market should close
- (of the 155 responders who said they use ISWM regularly 72.3% said I think there is a better alternative, 25.8% said it should reduce floorspace and opening times, and 1.9% said it should close.

3.18 In respect of the proposal for shorter opening hours on Sundays at Idea Stores

- 67.7% of responders said yes
- 32.3% of responders said No

Impact

- 3.19 We gathered information on how the proposal might impact people not only through the consultation survey but also through our focus groups, the challenge session and via direct communication. We heard how valuable the service is not only in terms of the services it provides but as an informal space to meet, study or relax. Whilst there were views expressed at either end of the possible spectrum, there were a number of common themes that emerged from what people said:
- Our young people need local spaces to study outside of their homes
 - Not everyone can comfortably travel the extra distance to another site
 - There was significant concern that the hours at BGL and to a lesser extent at ISWM might not be sufficient. Feedback suggested that having part day sessions was the wrong approach. People would rather have fewer days but longer hours on those days
 - Not everyone enjoys the bustling atmosphere in the Idea Stores and that the quieter environment in the two Libraries is more suitable for some
 - Provision on the Isle of Dogs was a particular concern to many who responded. Whilst visitor numbers, including locals, are relatively high IS Canary Wharf is not seen as the best location for an Idea Store by some local residents. There was strong feeling that some hours should be maintained at CTL at least until there is a more centrally located Idea Store on the Island that can replace both ISCW and CTL. There was some suggestion that if the only way of achieving this was to reduce hours at ISCW this should be considered
 - The focus groups gave us access to some very personal stories
 - The challenge session built on this and provided us with insight into both local and borough-wide concerns and, in particular, enabled us to hear from young people
- 3.20 As well as asking people how the proposals might impact them, we also asked their opinion on how we might change our proposals or what else we could do to achieve the saving instead.
- 3.21 A number of people suggested income generation, use of grants or fundraising as ways we might mitigate against the need to save money. Most of these would not be suitable sources for our largest budget item (staffing) and income from room hire is integral to our current budget. However, we will consider some of these approaches going into the future potentially for innovation costs or smaller local projects
- 3.22 Other mitigations that were suggested included asking the Youth Hubs to offer study space, reducing hours at other sites, the use of volunteers, and further publicising our Friends & Family book delivery service.

Proposal

3.23 Our original proposal was developed considering how people used our sites, their geographical spread and the services each was able to offer.

Idea Store / Library factsheet



1.95m
Total visits*



Idea Store Whitechapel
Most visited



2m
Virtual visits



Cubitt Town
Least visited



£1.6m



spent on service and buildings improvements

31k
Members



819k
Loans



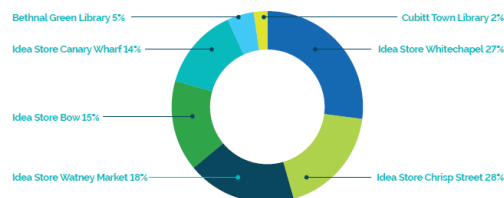
67k
Digital loans



There were roughly 2 million virtual visits to the website. People used the website to order and renew items, download eBooks and audiobooks, find out information about Idea Store Learning and Idea Store Local History Library and Archives and use many other virtual services. All data April 2019-March 2020.

Local presence spend included refurbishment work at five Idea Store sites, including the creation of new Digital Hubs.

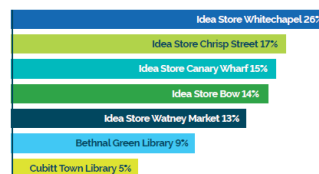
Percentage share of visits by Idea Stores and Libraries



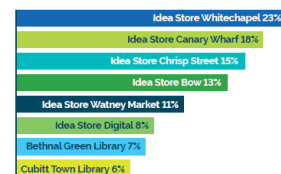
The site with the fewest members is Cubitt Town Library. Most people living in Isle of Dogs are registered at Idea Store Canary Wharf.

Digital loans of eBooks / audiobooks from Idea Stores are amongst the highest in the country and the highest in The Libraries Consortium in London. Loans of eBooks and audiobooks have grown significantly from April making 'Idea Store Digital' one of Tower Hamlets busier sites.

Members by Idea Store / Library









Loans by Idea Store / Library









3.24 We are committed to finding ways of continuing to deliver a great service to our residents and adapting how we do that the changes we have seen in how people access our services over the last few years, the impact of covid and the current budget pressures. With this in mind we developed the following potential five-year vision:

- **Four well placed Idea Stores** situated at Crisp Street, Bow, a new site on the Isle of Dogs (the plan is that this site will be more centrally located on the island and replace Idea Store Canary Wharf). The Whitechapel store will be split across the current Idea Store Whitechapel and New Town Hall, acting as a cultural hub for the borough
- **All four sites will have some redesign** which will support people to stay socially distant if required
- **Bethnal Green Library and Idea Store Watney Market will be run as satellite sites for Idea Store Bow and Idea Store Whitechapel** respectively with a reduced service on offer
- **Our digital offer will continue to develop**

3.25 We then developed our original proposal along with another option and proceeded to public consultation. Having listened to what residents said the following table sets out how we have adapted the proposal to mitigate the issues they told us about

Site(s)	Original Proposal	Revised Proposal	Change
IS Whitechapel IS Bow IS Canary Wharf IS Chrisp St	Keep these sites open 7 days a week but <ul style="list-style-type: none"> Reduce the level of staffing in the evening Reduce Sunday opening from 6 hours to 4 	Keep these sites open 7 days a week but <ul style="list-style-type: none"> Reduce the level of staffing in the evening Reduce Sunday opening from 6 hours to 4	
Cubitt Town Library (CTL)	Close the library service at Cubitt Town Library	Reduce opening hours at CTL so that it is open 10:00am till 6:00pm on Mondays and Wednesdays (16 hours)	
Bethnal Green Library (BGL)	Reduce opening hours at BGL from 50 to 15. Suggestion was that this might be for morning or afternoon sessions 5 days a week	Reduce opening hours at BGL so that it is open 10:00am till 6:00pm on Mondays, Wednesdays and Thursdays (24 Hours)	
IS Watney Market (ISWM)	Reducing the size of ISWM from 3 floors to 1 and its opening hours from 65 to 30. Suggestion was for morning and some afternoon sessions and some hours on Saturday.	Reduce the size of ISWM from three floors to one and open it for 8 hours a day on Mondays, Wednesdays, Thursdays (10:00am till 6:00pm) and Saturdays 9:00am till 5:00pm (32 hours)	
NB. the revised proposal cannot accommodate further changes to hours or days of opening without impacting the saving			
Staff Impact	Reduction of Circa 35 FTE	Reduction of Circa 33 FTE (30 if vacancies removed)	
Saving	Deliver a total of £1.6m by <ul style="list-style-type: none"> making the changes above reshaping the service to take advantage of the uptake of self-service by residents 	Deliver a total of £1.6m by <ul style="list-style-type: none"> making the changes above reshaping the service to take advantage of the uptake of self-service by residents 	

As stated above, there is an alternative option that further reduces the impact of the change by continuing to provide weekend opening at the two Libraries. However, this option cannot deliver the full saving and will create a £100k pressure on the budget.

Site(s)	Alternative proposal	Change
IS Whitechapel IS Bow IS Canary Wharf IS Chrisp St	Keep these sites open 7 days a week but <ul style="list-style-type: none"> Reduce the level of staffing in the evening Reduce Sunday opening from 6 hours to 4	
Cubitt Town Library (CTL)	Reduce opening hours at CTL so that it is open 10:00am till 6:00pm on Mondays and Wednesdays and 9:00am till 5:00pm on Saturdays (24 Hours)	
Bethnal Green Library (BGL)	Reduce opening hours at BGL so that it is open 10:00am till 6:00pm on Mondays, Wednesdays and Thursdays and 9:00am till 5:00pm on Saturdays (36 Hours)	
IS Watney Market (ISWM)	Reduce the size of ISWM from three floors to one and open it for 8 hours a day on Mondays, Wednesdays, Thursdays (10:00am till 6:00pm) and Saturdays 9:00am till 5:00pm (32 hours)	
Staff Impact	Reduction of Circa 31 FTE (28 if vacancies removed)	
Saving	Deliver a total of £1.5m by <ul style="list-style-type: none"> making the changes above reshaping the service to take advantage of the uptake of self-service by residents	

Background & proposed changes

3.26 Cubitt Town Library - Footfall at Cubitt Town Library is significantly lower than any of our other sites; just 44,651 visits last year, which is less than half of those at BGL, and about 2% of visits to the service as a whole. Usage of the public PCs is also lower than any other site. However, local residents told us how valuable this resource is particularly to the elderly, those with young children and the disabled, who may find it difficult to travel the distance to IS Canary Wharf regularly. For example:

“I’m registered Visually Impaired. Cubitt Town is easily accessible for me and the staff are very aware of my needs. Having to travel further is difficult for me”.

“This is the library I have used since childhood. I am now 81 years old. To get to another library I would have to travel far and this is difficult for me at this age”.

3.27 In response to the public consultation we now propose that instead of closing CTL we keep it open two days a week (10:00am till 6:00pm Mondays and Wednesdays). In addition, we will publicise our Friends and Family service which supports those who find it difficult to access services themselves. IS Canary Wharf, whilst not popular with all local residents, is close by. Longer term, we hope to replace both ISCW and CTL with a new, more centrally located, Idea Store as part of the planned Crossharbour development. We will also explore ways that we can maximise the use of the building, which could include co-location of another community focused service over time.

3.28 **Bethnal Green Library** - This site is currently dedicated to supporting the national Covid response (6 to 12 Months). A library service will resume at this site when it is handed back. Whilst visitor numbers are relatively low at this site (about 6% of all annual visits), it is a much-loved presence in the community and attendance at certain times of the day and for activities is clearly valued. Feedback from residents strongly suggested that opening in the mornings or afternoons only would not meet their needs and that longer ‘sessions’ were required. There was a lot of feeling that 15 hours was just too few:

“Me and my children regularly use Bethnal Green library after school I do not understand how reducing the hours to just 15 a week would work.”

“I would like more extended hours for Bethnal Green an important venue for the elderly and those who cannot access libraries further afield.”

3.29 In response to the public consultation we now propose that post-Covid, we re-open the service in this building three days a week 10:00am till 6:00pm on Monday, Wednesday and Thursday. This is an increase of 9 hours a week on our original proposal. In addition, we will publicise our Friends and Family service which supports those who find it difficult to access services themselves. The Library service will continue to be part of the offer from this historic building (approx 30% of space). Our asset strategy includes the release of the rest of the building to generate income (eg through letting and bookable space), but this would not affect the library space.

3.30 **IS Watney Market** - This site is currently being used as a Covid testing Centre (6 to 12 months). IS Watney Market does not deliver adult learning, but the percentage of its members who are children is higher than any other site. Post Covid, we had proposed to re-open this site but with a reduced footprint (one floor) and fewer hours spread in a pattern of mornings and/or afternoons throughout the week. Feedback from residents suggested that having morning or afternoon sessions spread across the week wouldn’t meet their needs and longer sessions were needed. For example people who use this site told us:

“Idea Store Watney Market reducing from 65 to 30 hours a week means that probably will be open during office hours when the children or people at work will not be able to use it. Having a library with limited opening hours will be detrimental.”

“I’m a normal bloke. I work Monday to Friday 9 to 5. What I love about idea stores is...that I can pop over after work, whether that be 6pm or 8pm. Weekends are when I have time to go and really visit the library.”

- 3.31 In response to the public consultation we propose to change how and when we open the building and open it for 8 hours a day 4 days a week (Monday, Wednesday, Thursday & Saturday) this is 32 hours a week; a small increase on our previous proposal of 30. We will develop the site as a satellite to IS Whitechapel with a strong focus on the children’s offer (which is very popular). Our Asset Strategy team will seek to identify a compatible shared user/activity to generate income and to mitigate costs of holding a building with a reduced IS use.
- 3.32 **Evening Staffing Levels.** After 7:00pm the atmosphere of the Idea Stores changes and the hustle and bustle of the day gives way to a quieter period. Few visitors need support from staff. As tutors and security staff are also on site at this time, we believe it is safe to reduce dedicated IS staff in the evenings.
- 3.33 **Sunday Opening.** Currently the four main sites are open 6 hours on Sundays although their opening and closing times differ so that they complement the typical opening times of the shopping areas in which they are situated. The stores are quieter on Sundays, and although we recognise that they offer a valued space to a significant number of residents there was broad agreement to reduce opening to 4 hours on Sundays from those who responded to the consultation.

4 EQUALITIES IMPLICATIONS

- 4.1 We have undertaken an EqIA screening and have concluded that, whilst the amended proposal mitigates the impact, the following protected groups are still potentially disproportionately affected by the proposal:
- Age
 - older people and children as they may have to travel further to their nearest Idea Store to access services on some days
 - Children would be less likely to travel further unsupervised. In some areas 20-39 age group may also be disproportionately affected
 - Young children/babies and their parents who access our parent and toddler groups may have to travel further on some days to access their nearest provision
 - Disability – people with disabilities may need to travel further on some days to access an Idea Store and may not have the support needed to do so.

- 4.2 We believe the revised proposal goes a long way to mitigating any negative impacts of the original proposal. However, it is worth noting that the alternative option would further reduce the impact by enabling us to provide a very local service to those who can only access our services at weekends.
- 4.3 The EqlA has been developed using existing data on our service users and population profiles alongside the results of the public consultation.
- 4.4 As part of the reorganisation, change process will also assess the equalities impact on our staff affected by the final service provision.

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 Under Section 7 of the Public Libraries and Museums Act 1964, 'it shall be the duty of every library authority to provide a comprehensive and efficient library service for all persons desiring to make use thereof' and that the authority 'shall in particular have regard to the desirability -
- a) of securing, by the keeping of adequate stocks, by arrangements with other library authorities, and by any other appropriate means, that facilities are available for the borrowing of, or reference to, books and other printed matter, and pictures, gramophone records, films and other materials, sufficient in number, range and quality to meet the general requirements and any special requirements both of adults and children; and
 - b) of encouraging both adults and children to make full use of the library service, and of providing advice as to its use and of making available such bibliographical and other information as may be required by persons using it; and
 - c) of securing, in relation to any matter concerning the functions both of the library authority as such and any other authority whose functions are exercisable within the library area, that there is full co-operation between the persons engaged in carrying out those functions.

6 COMMENTS OF THE CHIEF FINANCE OFFICER

- 6.1 This report recommends changes that would achieve existing savings targets totalling £1m agreed in the medium-term financial strategy (please refer to the table below) and a further £0.6m Local Presence and Idea Store Asset Strategy saving proposed for 2021-22.

MTFS Savings Tracker 2020-23				20/21	21/22
Reference	Approved	Title	Original Scope of previous savings pro-formas	Savings target £'000	Savings target £'000
SAV/ RES 10 / 18-19	2018-19	Additional Local Presence Efficiencies	Further local presence and customer access improvements - (1) continue to develop/drive/encourage take up of digital services to further reduce demand for phone and face-to-face contact, thus enabling further staffing reductions (2) investigate options for including Clean & Green call handling within new refuse & recycling contract (3) consider moving to digital-only access for appropriate service areas	300	-
SAV / ALL 001 / 19-20	2019-20	Phase 2 Local Presence - putting Digital First	<p>The increased use of digital services will be targeted to reduce staffing and transaction costs further whilst making services easier to access for residents. Digital services across the council will be designed to achieve specific cost reductions and these will be allocated on a service by service basis as the baseline costs are confirmed.</p> <p>This second phase of the Local Presence Review will ensure we don't duplicate services, we make the most efficient use of resources and that the way we deliver services keeps pace with what our residents want. This Review will consider options to rationalise staff, buildings and services in each of the localities.</p>	-	700

7 COMMENTS OF LEGAL SERVICES

- 7.1 The provision of library services is a legal function of the Council. When making a decision relating to changing the way the Council's legal functions are carried out the Council has a legal duty to act fairly. Consultation with affected parties is part of this duty and therefore the report demonstrates compliance with this duty.
- 7.2 Consultation will only be legally valid where sufficient time has been given to affected parties to make representation about potential changes and the

representation has been considered by the Council whilst the decision is still at a formative stage. Compliance in this regard is also demonstrated by this report in particular the change in the proposal in paragraph 3.25.

- 7.3 In taking any decision on the future of the public library service, the local authority will need to have due regard to the public sector equalities duty set out at Section 149 of the Equality Act 2010. This duty requires the local authority to eliminate discrimination, harassment, victimisation and any other conduct prohibited under the Equality Act 2010, and to advance equality of opportunity between individuals who share a relevant protected characteristic and those who do not. The proposals set out in this report comply with the above legislation and case law. Also as required by the Equality Act the Council has undertaken a detailed level of analysis regarding persons with a protected characteristic and the way in which they may be impacted upon by the proposals and built relevant mitigating factors into the proposals..
- 7.4 There may be an impact on staffing levels if sites are closed or overall hours are reduced. The Council will consult individual employees, unions and employee representatives. The Council will ensure that it follows a fair procedure as set out in the Council's Handling Organisational Change procedure and in line with prescribed time frames to inform and consult set out in the Trade Union and Labour Relations (Consolidation) Act 1992.
- 7.5 The impact on staffing is not detailed in the report as currently no decision has been taken as to which option will be pursued.

Linked Reports, Appendices and Background Documents

Linked Report

- None

Appendices

- Service Information & Data
- Equalities Impact Assessment

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

- None

Officer contact details for documents:

Or state

Teresa.Heaney@towerhamlets.gov.uk

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Idea Store / Library factsheet

1.95m
Total visits*



Idea Store Whitechapel
Most visited



2m
Virtual visits



Cubitt Town
Least visited



£1.6m
spent on service and buildings improvements



31k
Members



819k
Loans



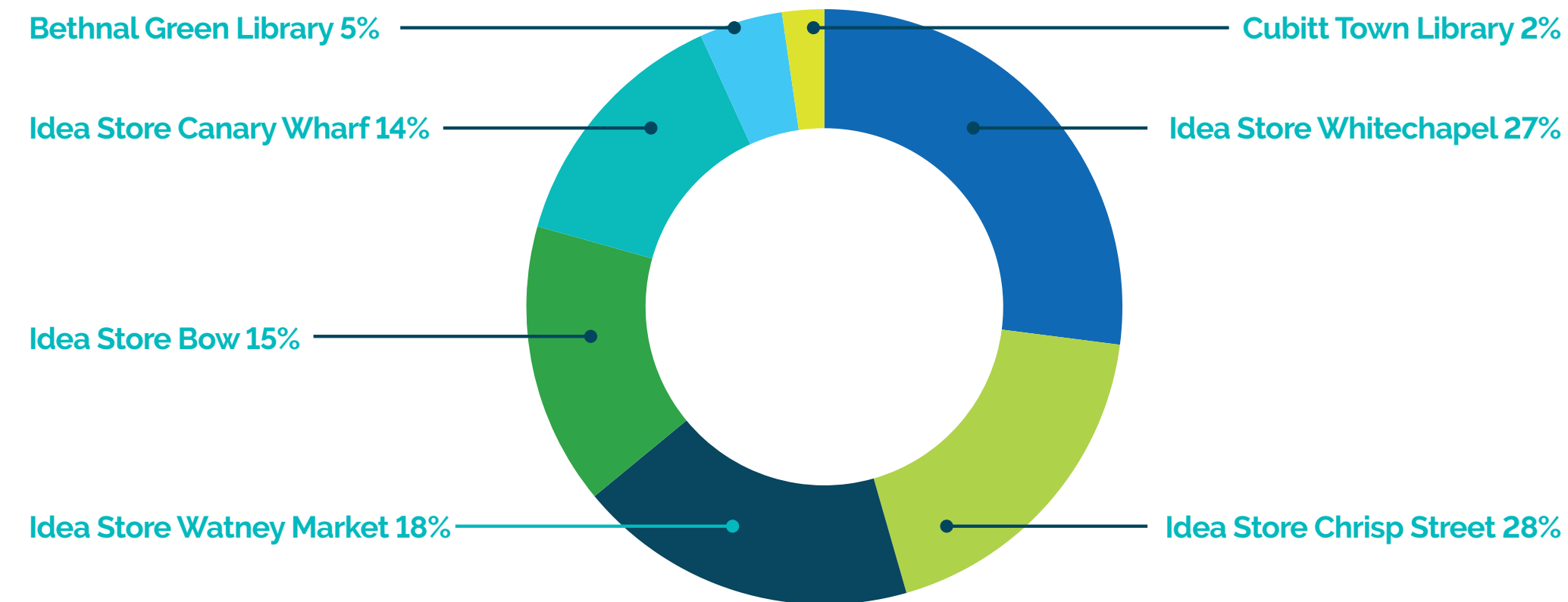
67k
Digital loans



There were roughly **2 million virtual visits** to the website. People used the website to order and renew items, download eBooks and audiobooks, find out information about Idea Store Learning and Idea Store Local History Library and Archives and use many other virtual services. All data April 2019-March 2020.

Local presence spend included refurbishment work at five Idea Store sites, including the creation of new Digital Hubs.

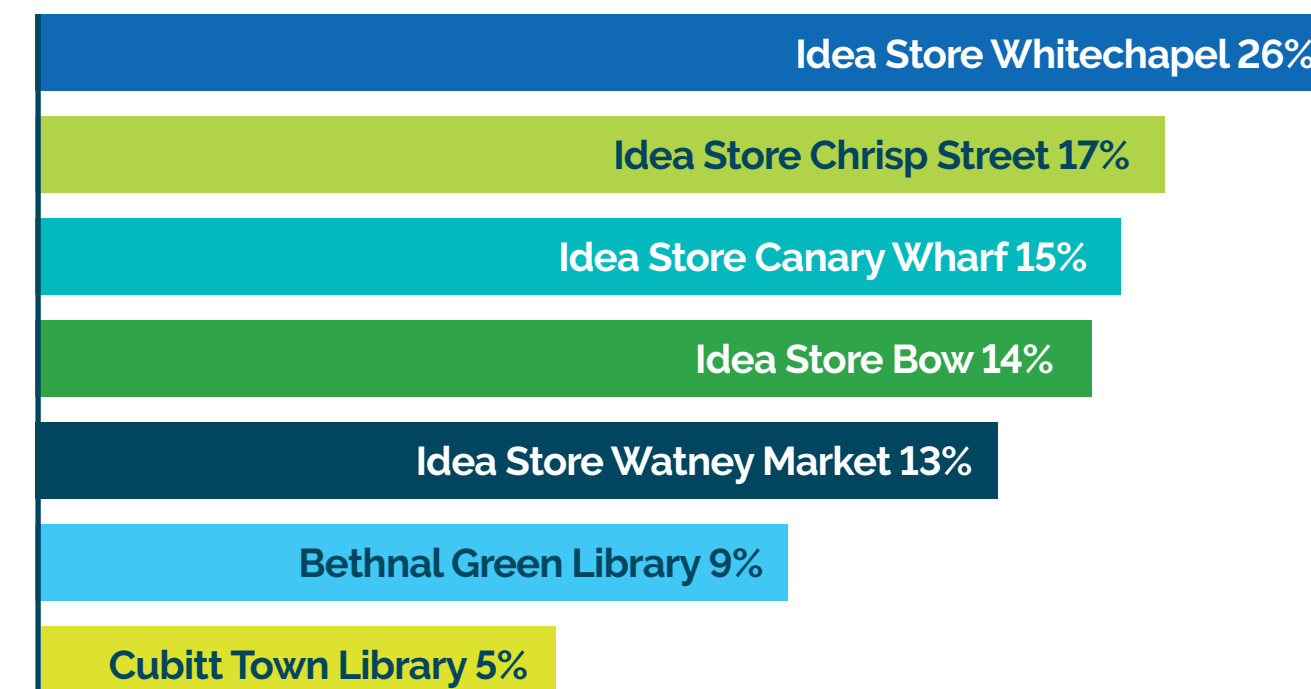
Percentage share of visits by Idea Stores and Libraries



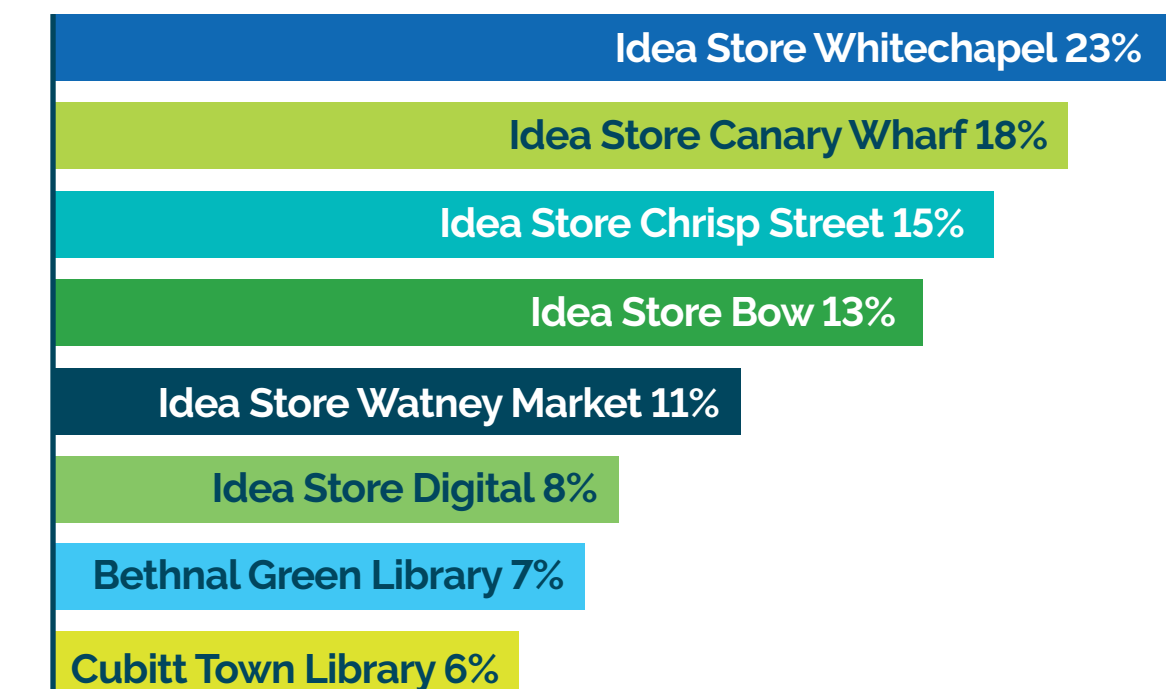
The site with the fewest members is Cubitt Town Library. Most people living in Isle of Dogs are registered at Idea Store Canary Wharf.

Digital loans of eBooks / audiobooks from Idea Stores are amongst the highest in the country and the highest in The Libraries Consortium in London. Loans of eBooks and audiobooks have grown significantly from April making 'Idea Store Digital' one of Tower Hamlets busier sites.

Members by Idea Store / Library



Loans by Idea Store / Library



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Idea Stores

The development of Idea Stores was based on one of the most comprehensive library consultation exercises undertaken in this country. Local people said they wanted longer opening hours, including Sunday opening, and to be able to combine a visit to the library with other activities, particularly shopping. Responding to this, each of the five new Idea Stores that opened between 2002 and 2013 was located in the middle of a busy shopping centre. The four main stores have seven day a week opening, and all stores are open until 9pm on weekdays.

From the start Idea Stores have been an integrated Library and Learning and Information service. The borough's adult and community education programmes are delivered from the stores in dedicated 'learning labs'. The Idea Store information offer includes provision of digital hubs where people can access council digital services, with extra support from staff if they need it. This is the 'full service' on offer in Idea Stores and distinguishes them from the two stand-alone libraries.

Idea Stores provide a focal point for the communities in which they are based. They are vibrant places where people can learn, study, find out information, browse from a well curated collection of books, join in activities or events, meet friends – or just relax.



Bethnal Green Library

Bethnal Green Library is one of the borough's two stand-alone libraries. It does not have any learning classes but has a programme of activities of which storytime is the most popular, and there are PCs for public use. It opened in 1922 - in the old Bethnal House asylum. The library now occupies just one ground floor room in the building. It is some distance away from the main shopping centre in Bethnal Green Road which reduces the number of visitors, and its location in Bethnal Green Gardens, although attractive in many ways is also a deterrent to visitors, especially in winter.

4500
Total members



109.7k
Annual visits



55.9k
Annual loans



Opening hours by day

Day	09:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00	19:00	20:00	21:00	Total
Monday														9
Tuesday														9
Wednesday														9
Thursday														11
Friday														9
Saturday														9
Sunday														0
Total	1	6	6	6	6	6	6	6	6	5	1	1	0	56

Page 48
4.60
Staff
(full time equivalent)



50
PC hours/wk



23%
Avg. PC usage



35%
Peak PC usage



Learning provision?
No



0
Hours spent on courses



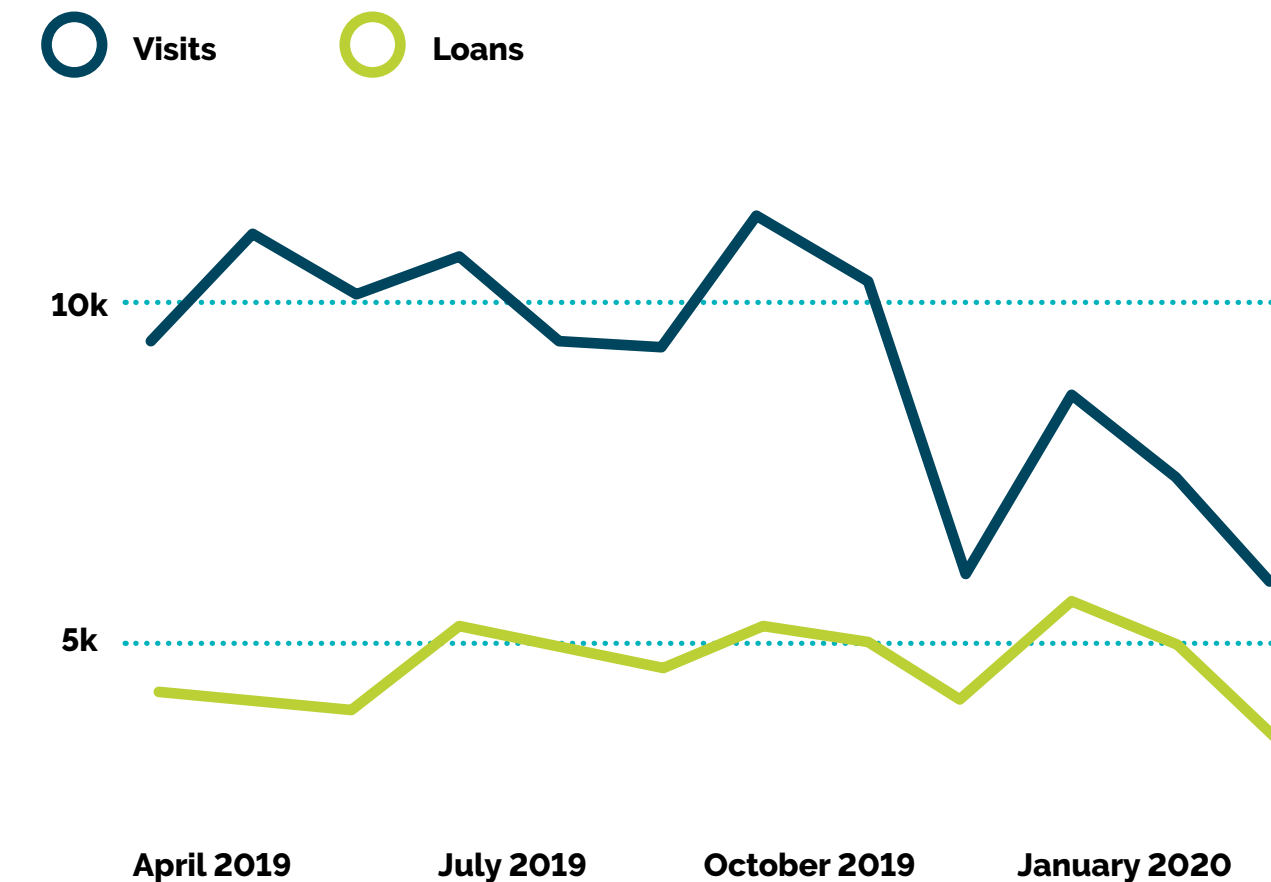
93%
Visitor satisfaction



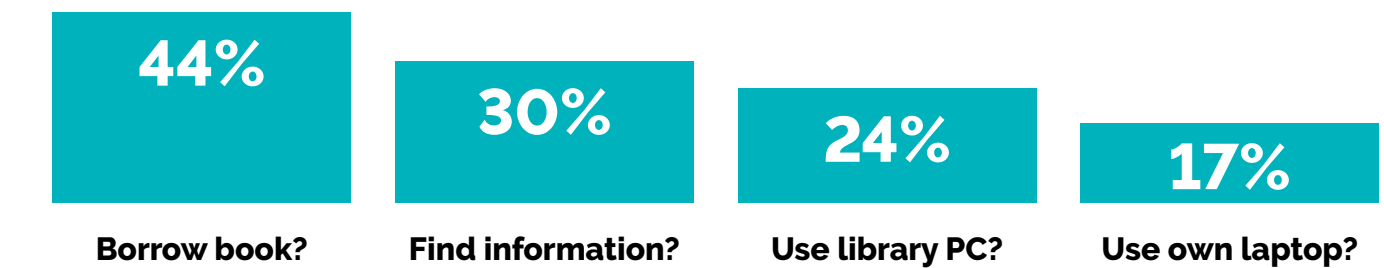
400
Square metres



Visits and loans over time



Survey questions: reason for visit (proxy)



Active members by type and age category

Active users	16 and under	Over 16	Total
Active borrowers	22.5%	36.5%	59%
Active but not borrowing	3.1%	37.9%	41%
Total	25.6%	74.4%	100%

Cubitt Town Library

Cubitt Town Library is housed in an Edwardian building in a residential street on the Isle of Dogs. It does not have any learning classes but has a programme of activities including a well-attended Prime Time for older people, and there are PCs for public use. Although the interior and book stock have been improved in recent years, its location and near invisibility means that it struggles to attract visitors.

2684
Total members



44.7k
Annual visits



45.1k
Annual loans



4.20
Staff
(full time equivalent)



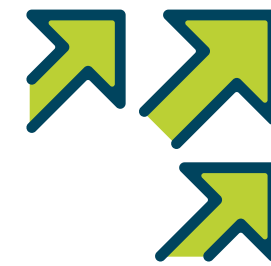
50
PC hours/wk



17%
Avg. PC usage



26%
Peak PC usage



Learning provision?
No



0
Hours spent on courses



91%
Visitor satisfaction



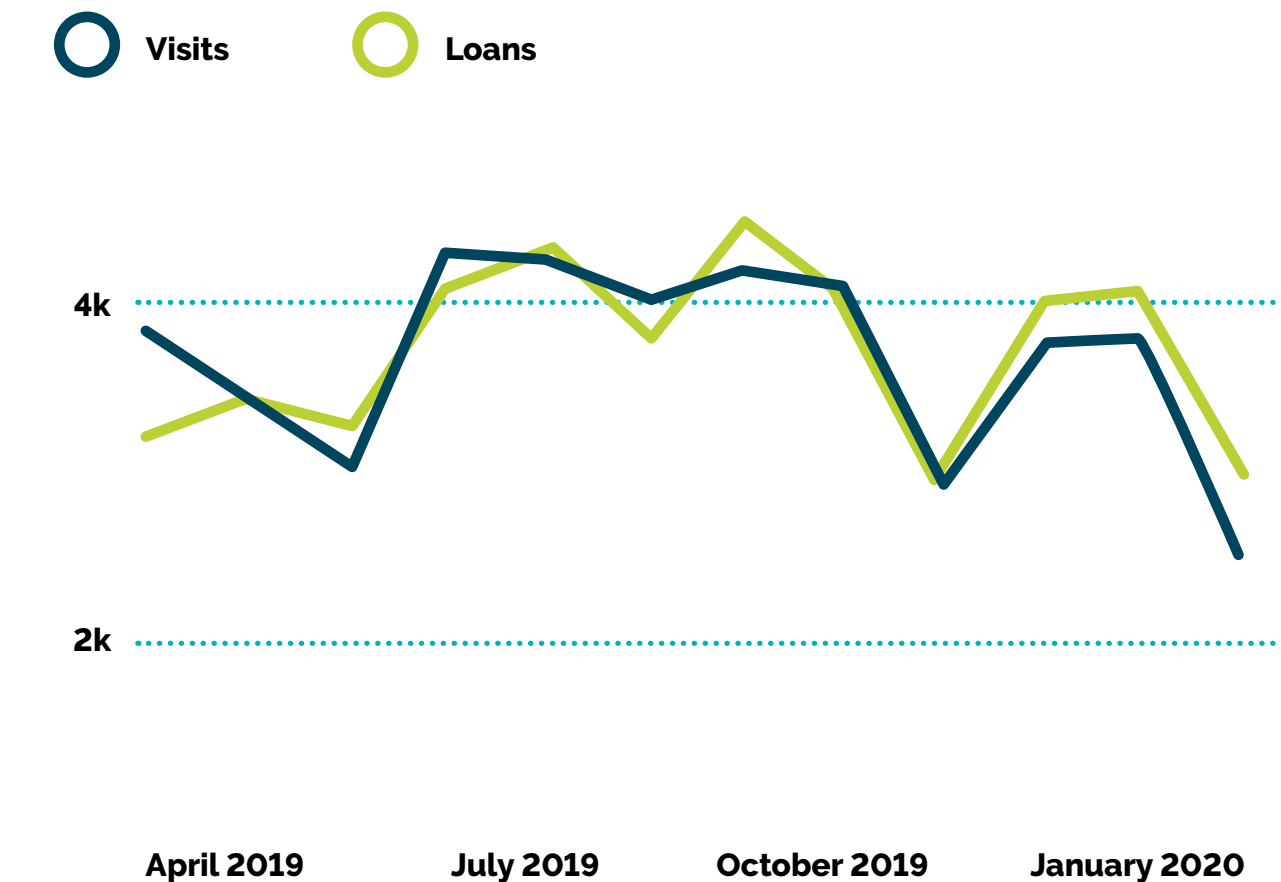
300
Square metres



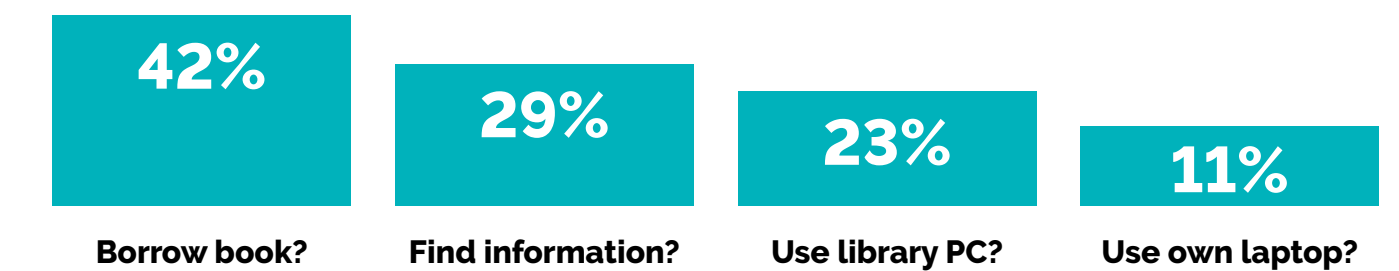
Opening hours by day

Day	09:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00	19:00	20:00	21:00	Total
Monday														9
Tuesday														9
Wednesday														9
Thursday														11
Friday														9
Saturday														9
Sunday														0
Total	1	6	6	6	6	6	6	6	6	5	1	1	0	56

Visits and loans over time



Survey questions: reason for visit (proxy)



Active members by type and age category

Active users	16 and under	Over 16	Total
Active borrowers	30.1%	28.4%	58.5%
Active but not borrowing	3.6%	38%	41.5%
Total	33.7%	66.3%	100%

Idea Store Bow

Idea Store Bow was the first Idea Store to open in 2002. It is set just back from Roman Road, next to Tesco. It is particularly busy on Tuesday, Thursday and Saturday when the street market is open and the cafe inside the store is especially popular. Idea Store Bow offers a full range of services including adult learning classes as well as separate adults' and children's libraries and public access computers. It has a programme of activities for adults and children and health advice sessions from NHS partners. A digital hub to access council services was fitted out in 2019 and further refurbishment is planned

7511
Total members



287k
Annual visits



105.7k
Annual loans



Page 50
11.76
Staff
(full time equivalent)



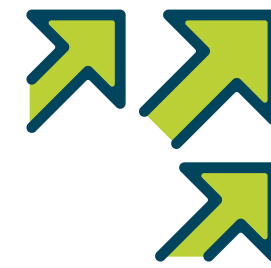
71
PC hours/wk



35%
Avg. PC usage



53%
Peak PC usage



Learning provision?
Yes



1.07K
Hours spent on courses



87%
Visitor satisfaction



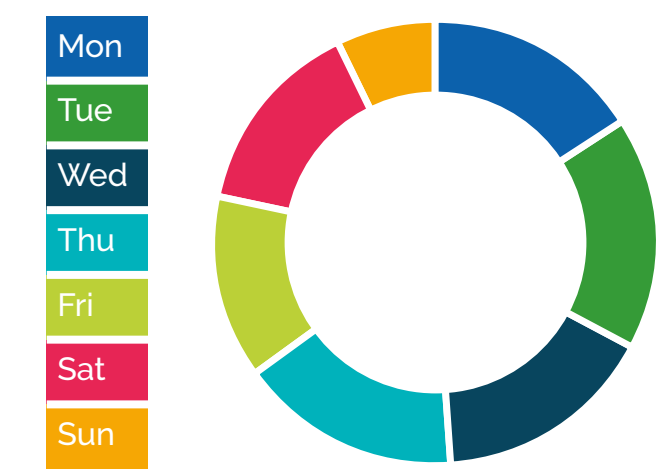
1100
Square metres



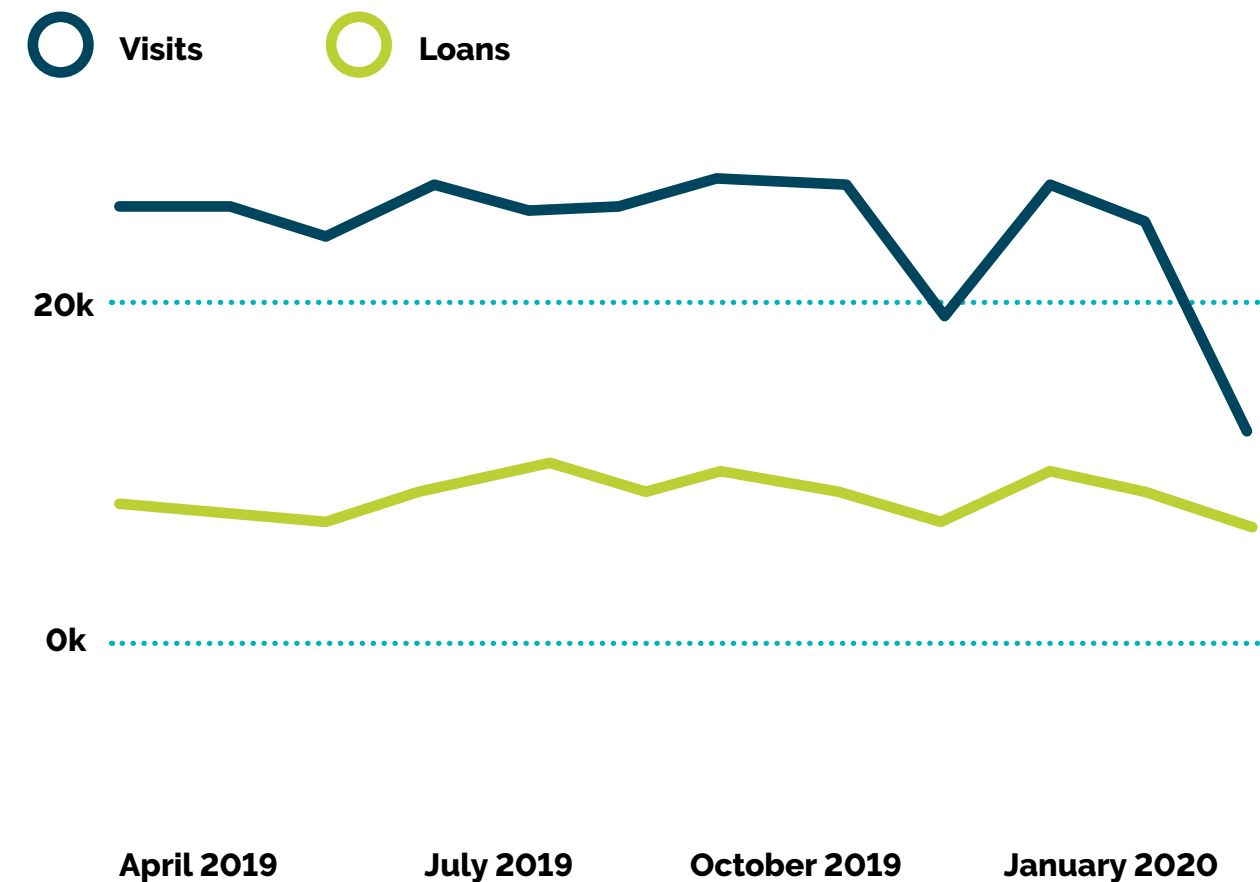
Opening hours by day

Day	09:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00	19:00	20:00	21:00	Total
Monday														9
Tuesday														9
Wednesday														9
Thursday														11
Friday														9
Saturday														9
Sunday														0
Total	6	7	7	7	7	7	7	7	6	5	4	4	4	56

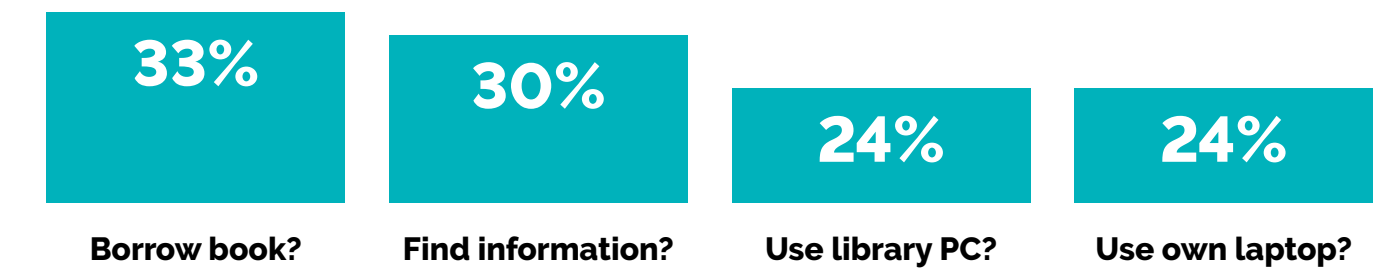
Av. daily visits (Jan-Mar)



Visits and loans over time



Survey questions: reason for visit (proxy)



Active members by type and age category

Active users	16 and under	Over 16	Total
Active borrowers	23.8%	32.5%	56.3%
Active but not borrowing	5%	38.7%	43.7%
Total	28.8%	71.2%	100%

Idea Store Canary Wharf

Idea Store Canary Wharf is in Churchill Place, at the foot of the Barclays Tower. It's set apart from main shopping areas although is near Waitrose. It offers a full range of services including adult learning classes as well as a separate adults' and children's libraries and public access computers. It has a programme of activities for adults and children. Storytime is particularly popular with some sessions attracting 50 participants. Idea Store Canary Wharf is especially busy at lunchtimes with Canary Wharf employees choosing to go there to relax. A digital hub to access council services was fitted out in 2019 and further refurbishment, including a move into the now vacant post office site next door is planned. The store is well used but our aim is to relocate to the Crossharbour area which is more centrally located.

8169
Total members



250.1k
Annual visits



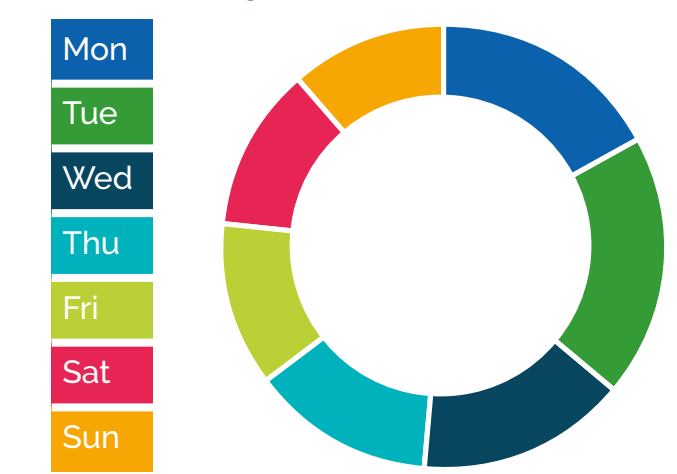
145k
Annual loans



Opening hours by day

Day	09:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00	19:00	20:00	21:00	Total
Monday														9
Tuesday														9
Wednesday														9
Thursday														11
Friday														9
Saturday														9
Sunday														0
Total	6	6	6	7	7	7	7	7	7	6	4	4	4	56

Av. daily visits (Jan-Mar)



10.66
Staff



71
PC hours/wk



Page 51
(full time equivalent)

33%
Avg. PC usage



50%
Peak PC usage



Learning provision?
Yes



11.33K
Hours spent on courses



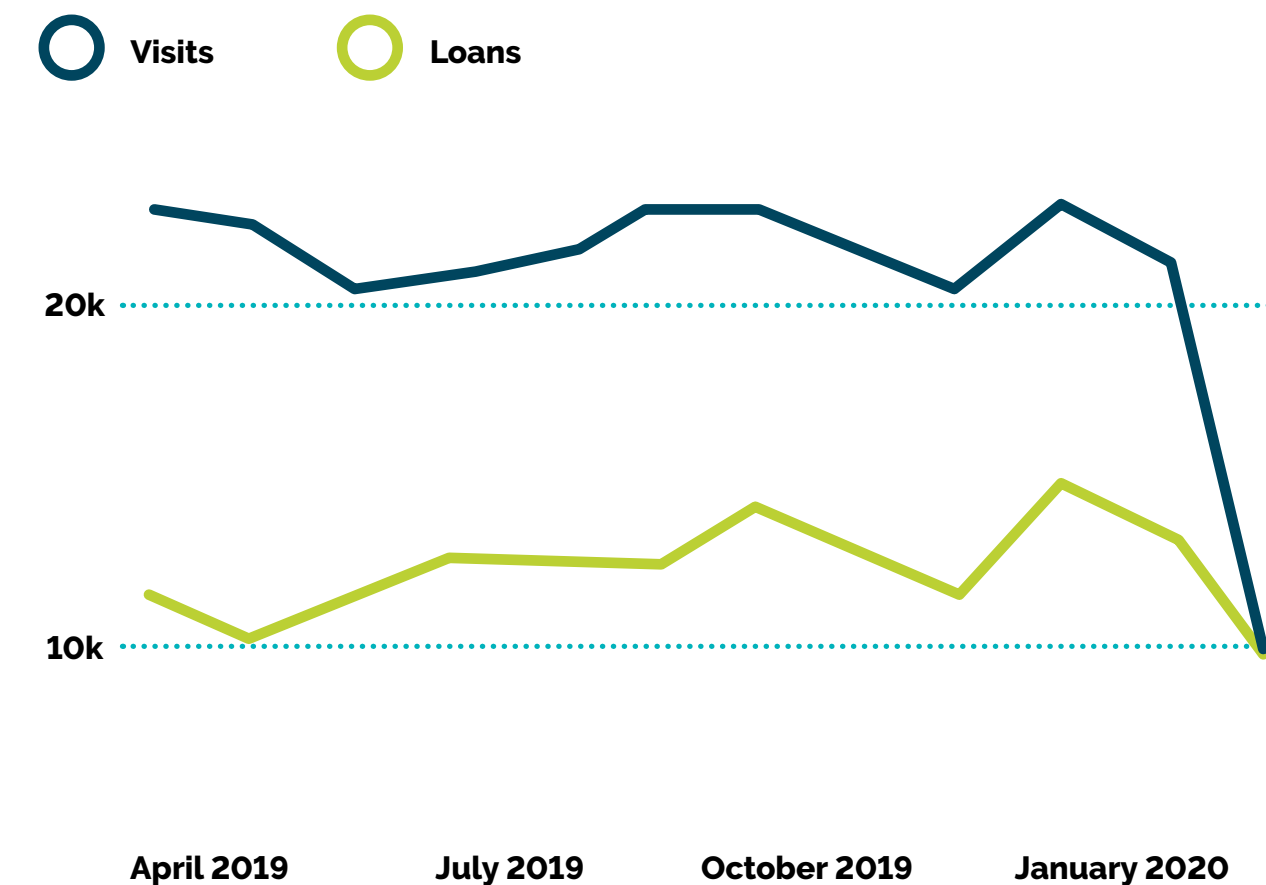
94%
Visitor satisfaction



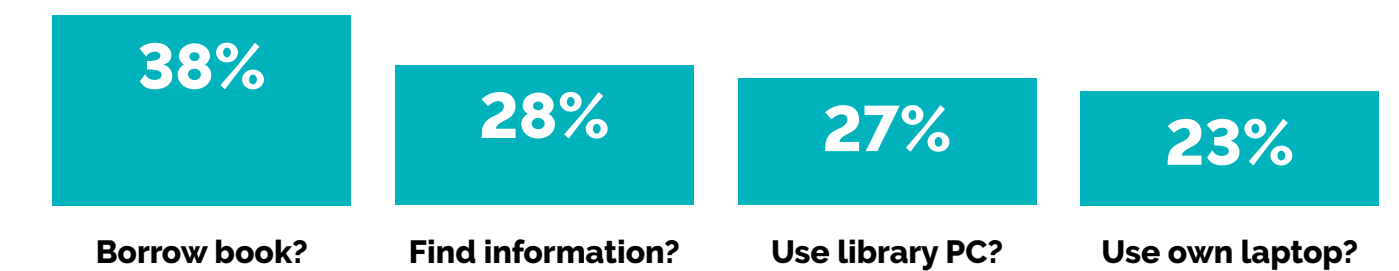
940
Square metres



Visits and loans over time



Survey questions: reason for visit (proxy)



Active members by type and age category

Active users	16 and under	Over 16	Total
Active borrowers	16.2%	41%	57.2%
Active but not borrowing	2.2%	40.6%	42.8%
Total	18.4%	81.6%	100%

Idea Store Crisp Street

Idea Store Crisp Street, opened in July 2004, is the second busiest site after Idea Store Whitechapel. It is situated in the east of the borough, just set back from East India Dock Road and at the southern end of Crisp Street Market. Idea Store Crisp Street is a two-storey building with a full range of services including adult learning classes as well as a separate adults' and children's libraries and public access computers. It has a programme of activities for adults and children. Partners offering regular advice sessions include Public Health, Poplaw legal services and Citizen's Advice. Major refurbishment took place in 2019 including the installation of a digital hub to access council services and there are plans to increase the size of the building in the future.

8930
Total members



349.6k
Annual visits



122.4k
Annual loans



Page 52
13.76
Staff
(full time equivalent)



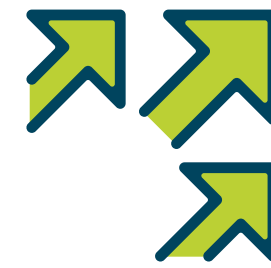
71
PC hours/wk



33%
Avg. PC usage



50%
Peak PC usage



Learning provision?
Yes



10.95K
Hours spent on courses



91%
Visitor satisfaction



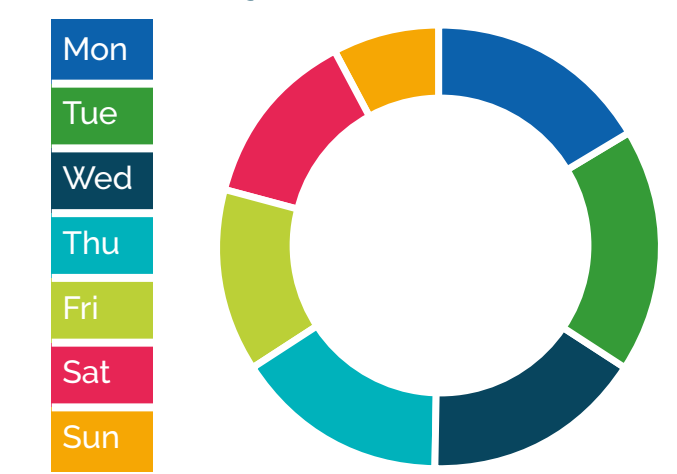
1100
Square metres



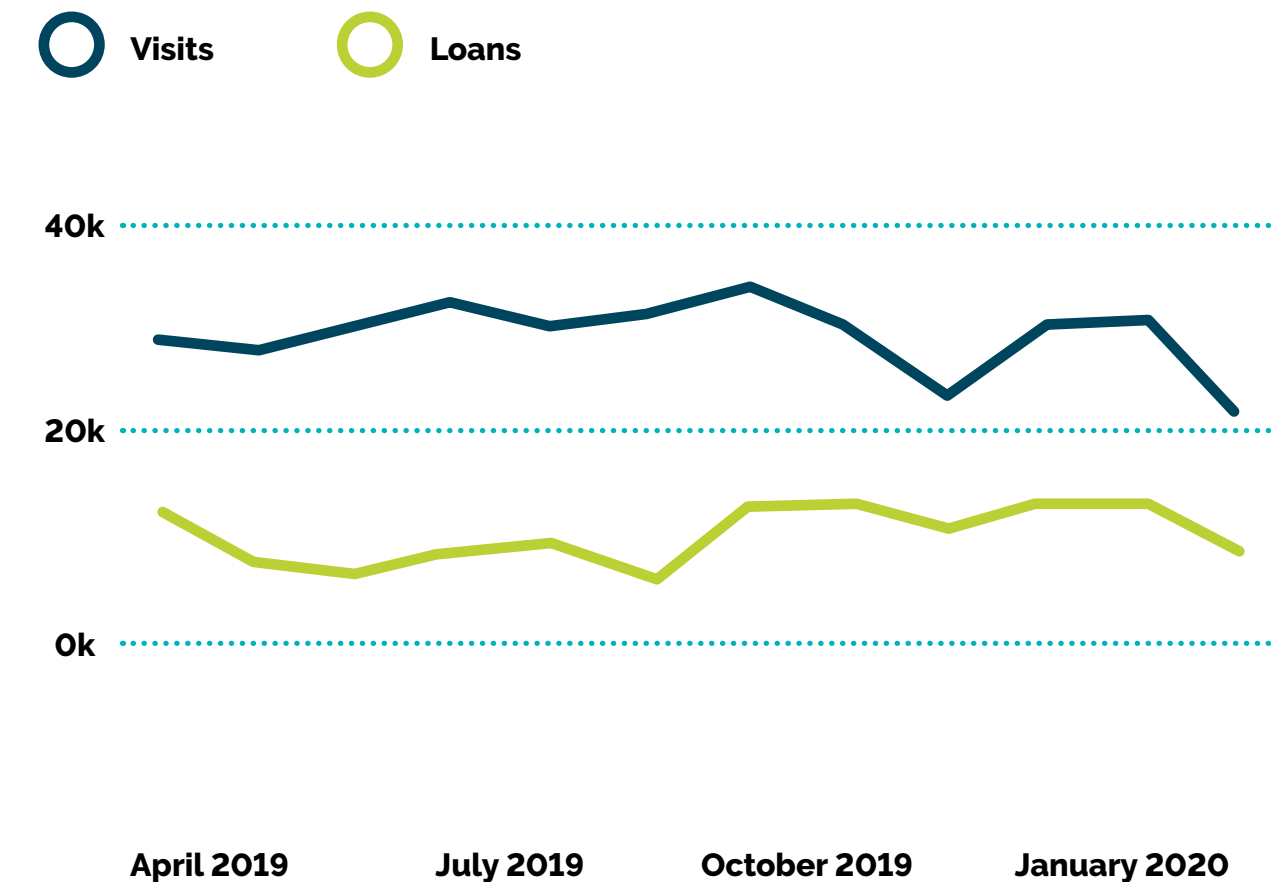
Opening hours by day

Day	09:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00	19:00	20:00	21:00	Total
Monday														9
Tuesday														9
Wednesday														9
Thursday														11
Friday														9
Saturday														9
Sunday														0
Total	6	7	7	7	7	7	7	7	6	5	4	4	4	56

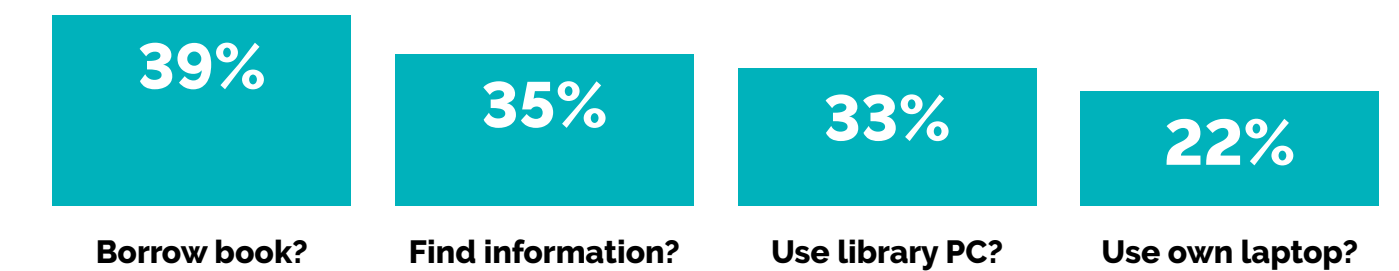
Av. daily visits (Jan-Mar)



Visits and loans over time



Survey questions: reason for visit (proxy)



Active members by type and age category

Active users	16 and under	Over 16	Total
Active borrowers	33.4%	25.2%	58.5%
Active but not borrowing	6.7%	34.8%	41.5%
Total	40%	60%	100%

Idea Store Watney Market

Idea Store Watney Market, which opened in 2013, is based on three floors. It originally included the council One Stop Shop but this was replaced last year with a digital hub as part of the Local Presence programme. Idea Store Watney Market is situated in the south west of the borough on the Commerical Road and just around the corner from Watney Market, a thriving street market. Unlike the other stores there is no learning offer and, like the two stand-alone libraries, it does not open on a Sunday. Many local residents travel to use the more extensive services at Idea Store Whitechapel, however Idea Store Watney Market is particularly popular with children and there are strong links with local schools and very well attended holiday programmes.

7040
Total members



290.2k
Annual visits



93.7k
Annual loans



11.91
Staff



65
PC hours/wk



Page 53
(full time equivalent)

29%
Avg. PC usage



44%
Peak PC usage



Learning provision?
No



340
Hours spent on courses



95%
Visitor satisfaction



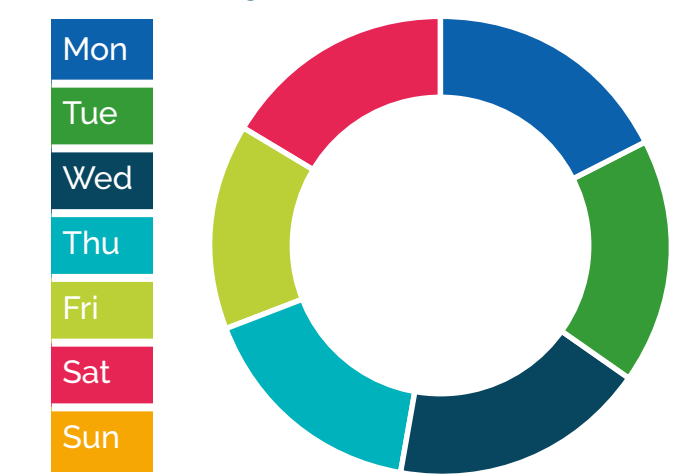
1200
Square metres



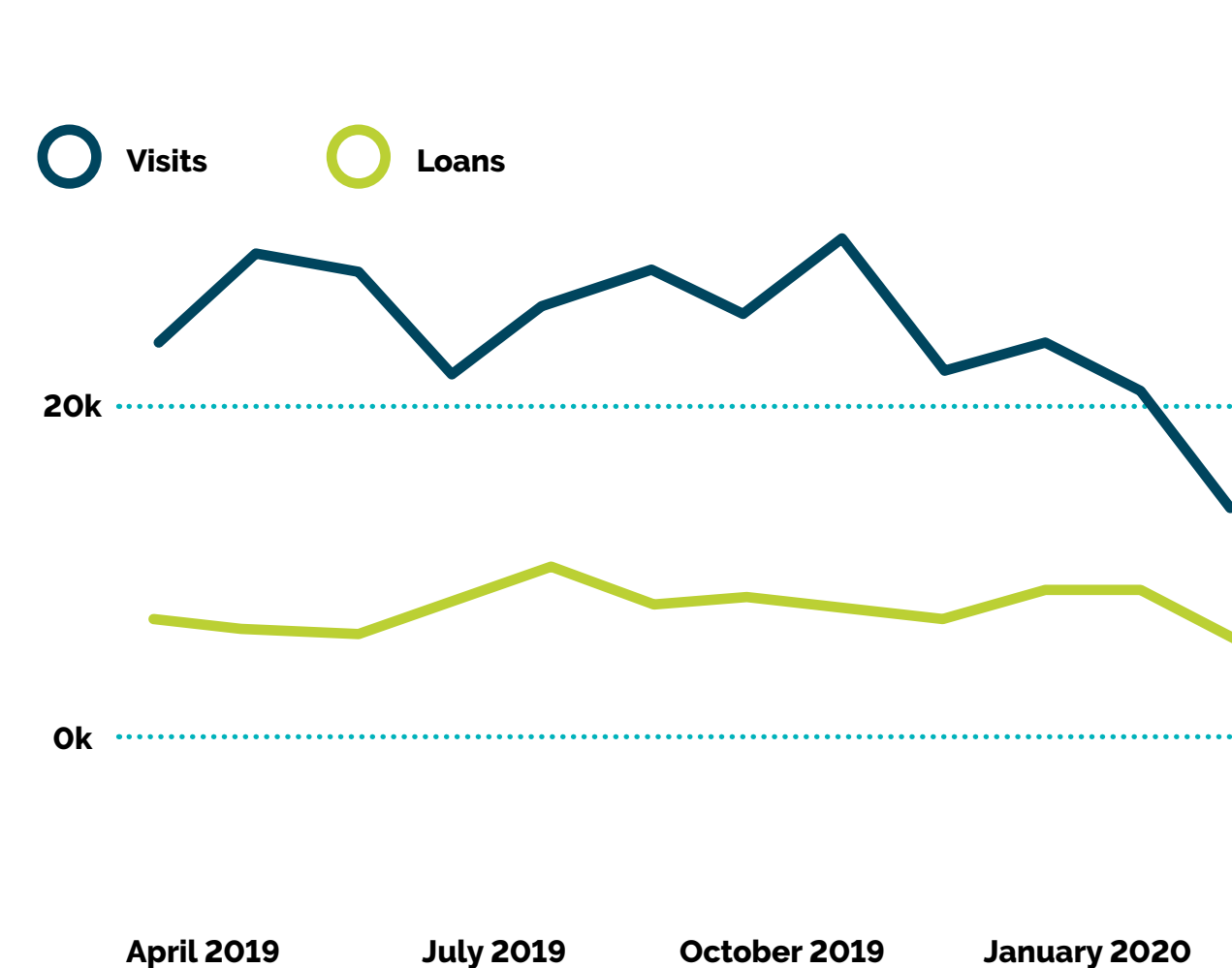
Opening hours by day

Day	09:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00	19:00	20:00	21:00	Total
Monday														9
Tuesday														9
Wednesday														9
Thursday														11
Friday														9
Saturday														9
Sunday														0
Total	6	6	6	6	6	6	6	6	6	5	4	4	4	56

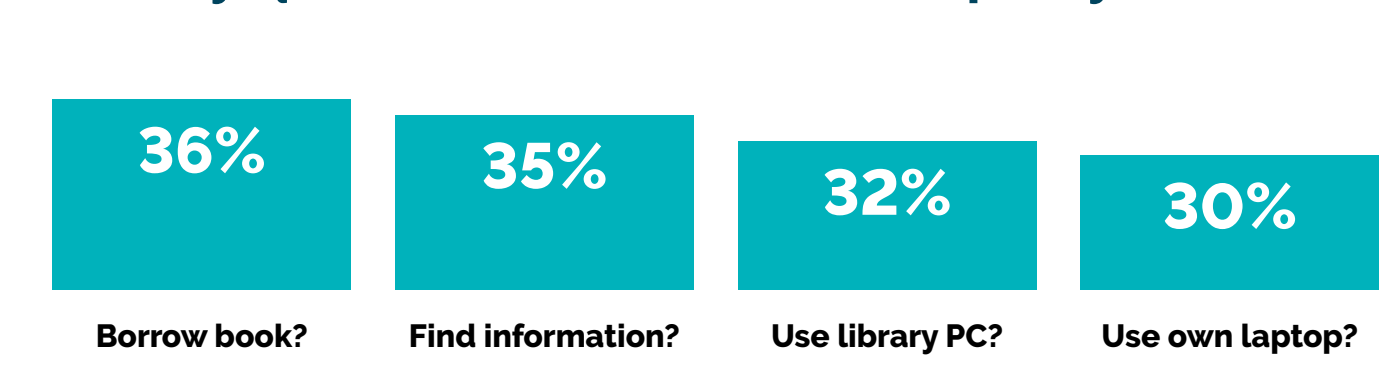
Av. daily visits (Jan-Mar)



Visits and loans over time



Survey questions: reason for visit (proxy)



Active members by type and age category

Active users	16 and under	Over 16	Total
Active borrowers	36.6%	21.3%	57.9%
Active but not borrowing	7.7%	34.4%	42.1%
Total	44.3%	55.7%	100%

Idea Store Whitechapel

Idea Store Whitechapel opened in September 2005 and is situated between Whitechapel market and Sainsbury's. It outperforms all other sites in Tower Hamlets, and it is the 4th most visited library in London. The flagship store has five storeys with a cafe and a gallery on the top floor and there are dedicated health and business and art libraries. The learning spaces include a conference room and specialist space for teaching dance. There is a full programme of activities for adults and children and regular exhibitions and events including the services' annual Writeidea reading festival. Because of its footfall Idea Store Whitechapel is very much in demand by partner organisations wanting to reach a wider audience. Partners, including Public Health regularly do outreach work at the store.

15,000
Total members



472.2k
Annual visits



184.7k
Annual loans



Page 54
26.15
Staff
(full time equivalent)



71
PC hours/wk



54%
Avg. PC usage



80%
Peak PC usage



Learning provision?
Yes



54.36
Hours spent on courses



92%
Visitor satisfaction



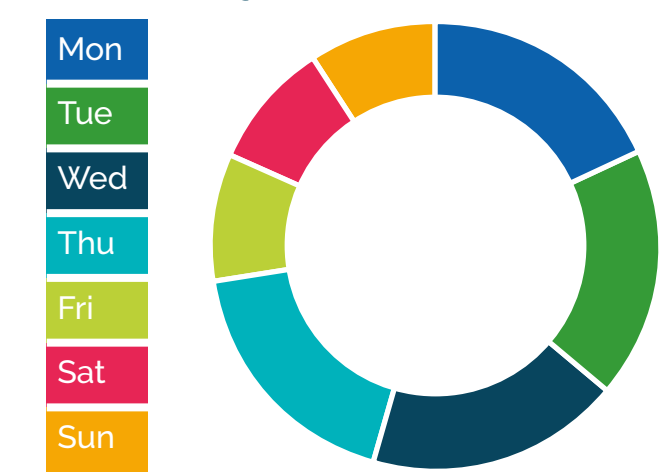
3500
Square metres



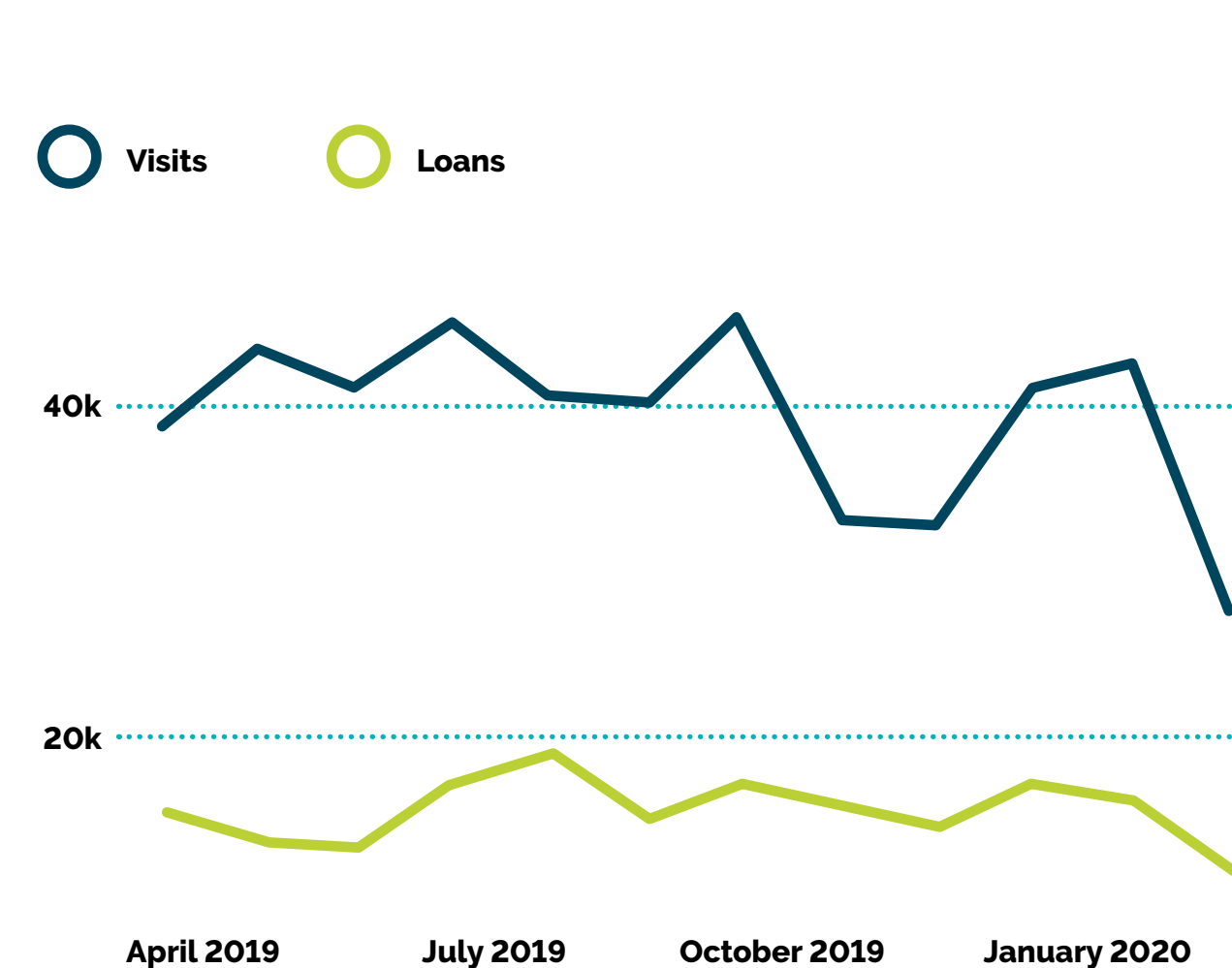
Opening hours by day

Day	09:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00	19:00	20:00	21:00	Total
Monday														9
Tuesday														9
Wednesday														9
Thursday														11
Friday														9
Saturday														9
Sunday														0
Total	6	6	7	7	7	7	7	7	7	5	4	4	4	56

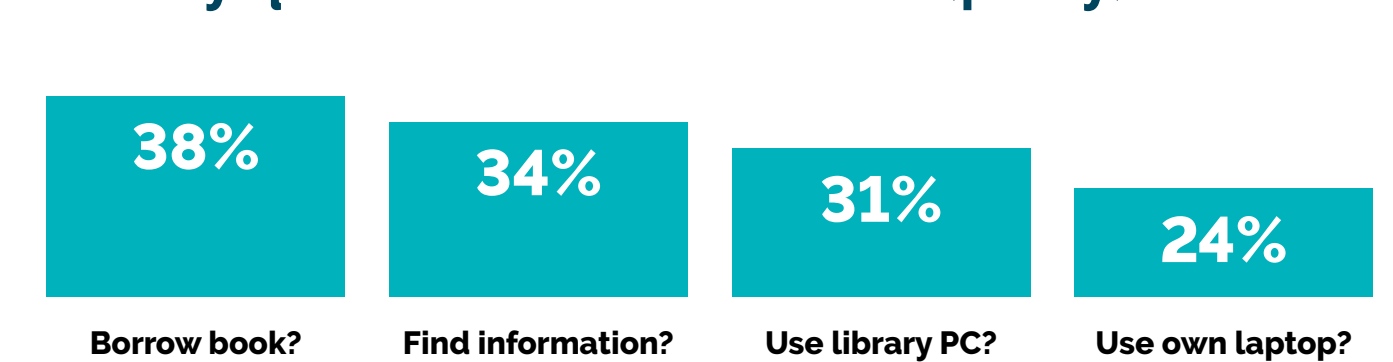
Av. daily visits (Jan-Mar)



Visits and loans over time



Survey questions: reason for visit (proxy)



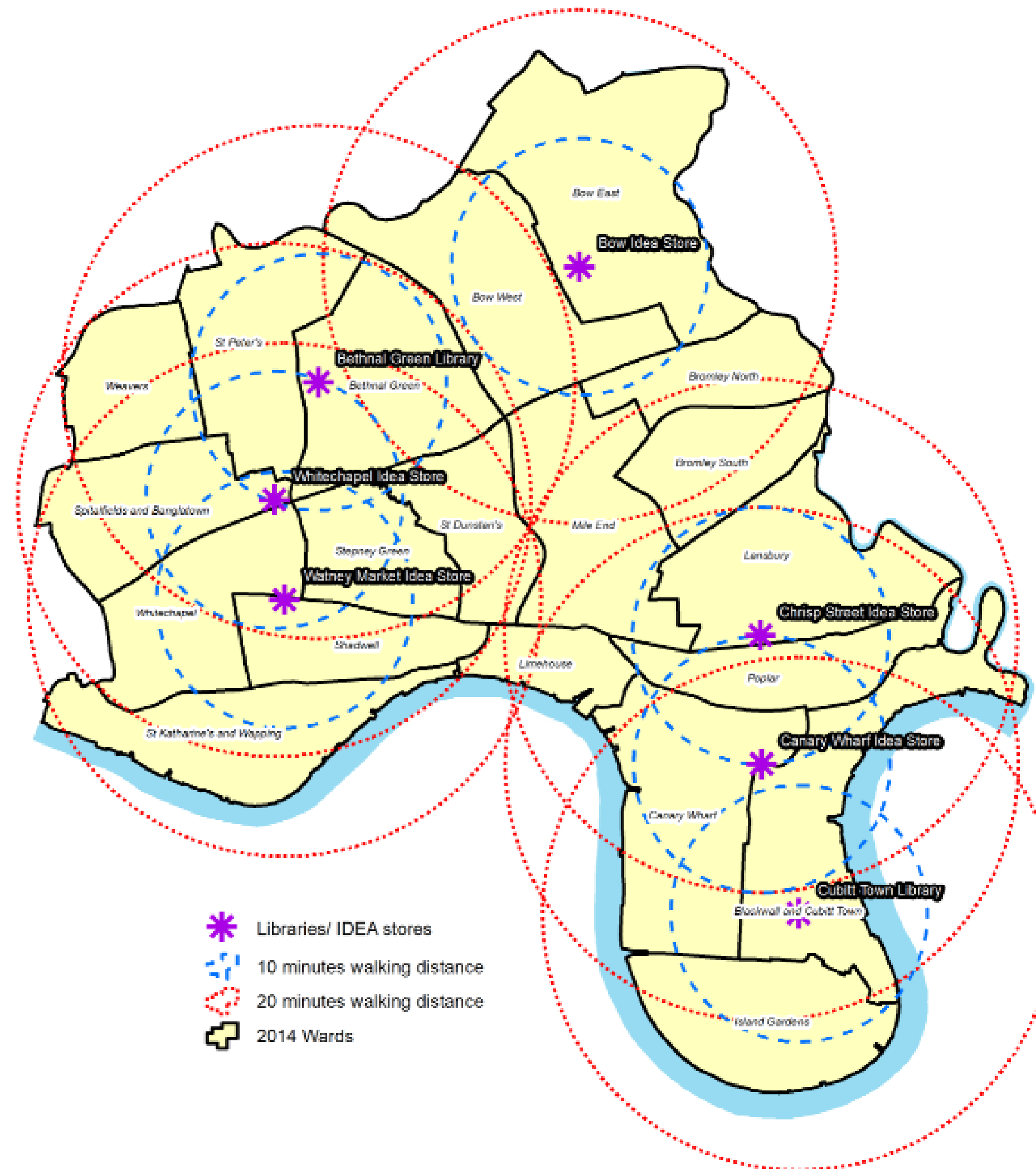
Active members by type and age category

Active users	16 and under	Over 16	Total
Active borrowers	25.3%	28.9%	54.2%
Active but not borrowing	5.8%	40.1%	45.8%
Total	31.1%	68.9%	100%

Current Idea Store and Library sites

About this map

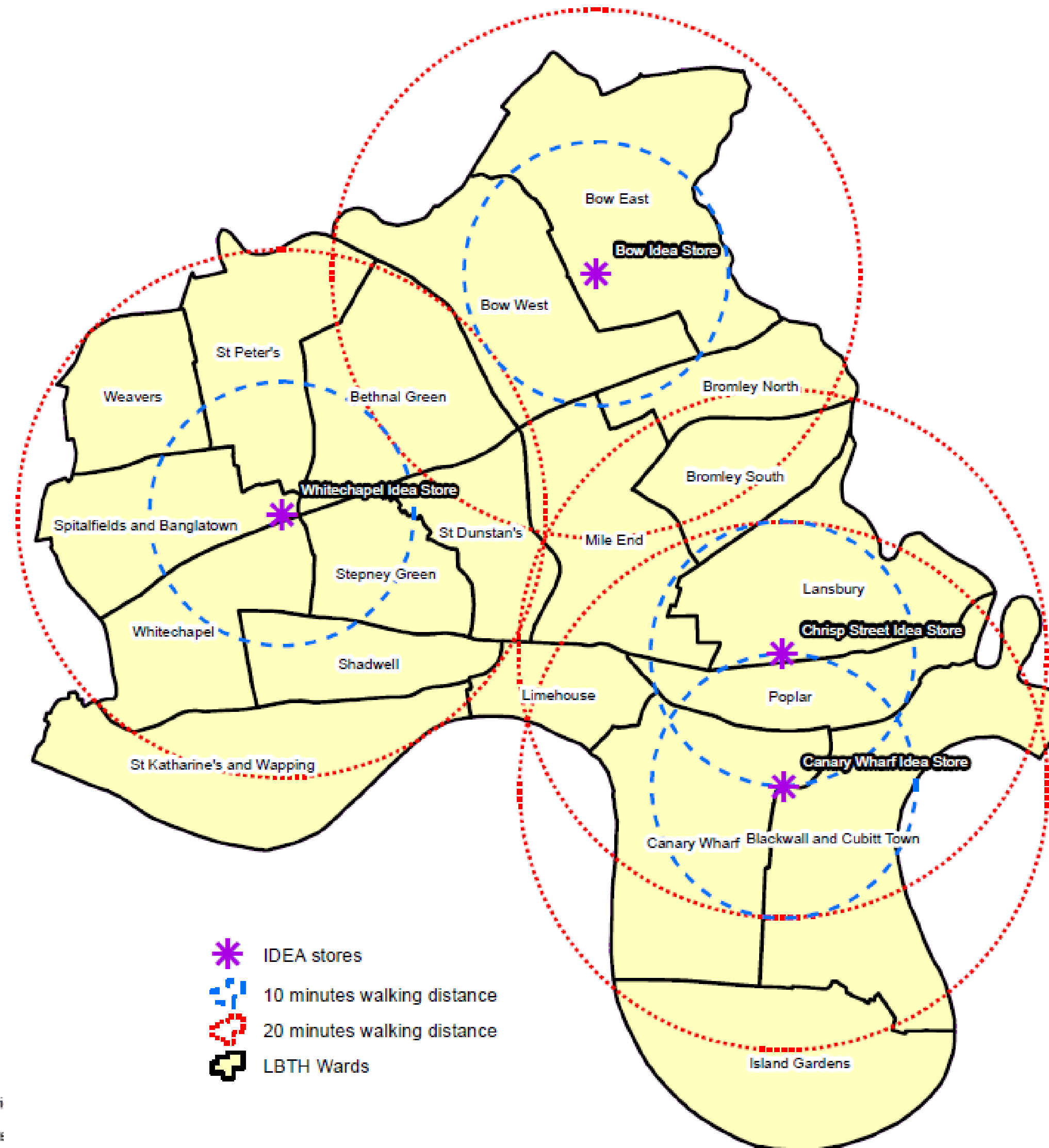
This map shows 10 and 20 minute walking buffer zones around each site in Tower Hamlets. It is designed to give a rough indication of site coverage across the borough. It is calculated based on an average walking pace and as the crow flies rather than by road / footpath network



Situation if library sites and Watney Market close

About this map

This map shows 20 minute walking buffer zones around each site in Tower Hamlets. It is designed to give a rough indication of site coverage across the borough. It is calculated based on an average walking pace and as the crow flies. In this version, Watney Market Idea Store and Bethnal Green and Cubitt Town libraries have been removed.



Equality Impact Analysis (EIA) – impact on residents, service users and other groups in the community affected by a proposal




Section 1: Introduction

Name of proposal	
For the purpose of this document, 'proposal' refers to a policy, function, strategy or project	
Revised approach to Idea Stores Service	
Service area and Directorate responsible	
Customer Services, Resources	
Name of completing officer	
Iqbal Raakin supporting Sergio Dogliani and Teresa Heaney	
Approved by (Director / Head of Service)	Date of approval
	Click or tap to enter a date.

Where a proposal is being taken to a committee, please append the completed EIA(s) to the cover report.

Conclusion – To be completed at the end of the Equality Impact Analysis process



Conclusion	Current decision rating (see Appendix A)
<p>An EIA has been undertaken and some people in the following protected groups may be disproportionately affected by the proposal:</p> <ul style="list-style-type: none"> • Age – older people and children as they may have to travel further to their nearest Idea Store to access services on some days. Children would be less likely to travel further unsupervised. In some areas 20-39 age group may also be disproportionately affected. Young children/babies and their parents who access our parent and toddler groups may have to travel further on some days to access their nearest provision. • Disability – people with disabilities may need to travel further on some days and may not have the support needed to do so • Race – majority of the population and service users in the different areas/libraries affected are from one or two ethnic backgrounds • Religion - majority of the population and service users in the different areas/libraries affected are from one or two faith/non-faith backgrounds <p>The following groups are also likely to be affected:</p>	<p>Amber</p> 

- Socio-economic – students and long-term unemployed residents may be affected as their access to library and IT services may be limited on certain days if they are unable to get to another site.



The Equality Act 2010 places a ‘General Duty’ on all public bodies to have ‘due regard’ to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity between those with ‘protected characteristics’ and those without them
- Fostering good relations between those with ‘protected characteristics’ and those without them

This Equality Impact Analysis provides evidence for meeting the Council’s commitment to equality and the responsibilities outlined above. For more information about the Council’s commitment to equality, please visit the Council’s [website](#).

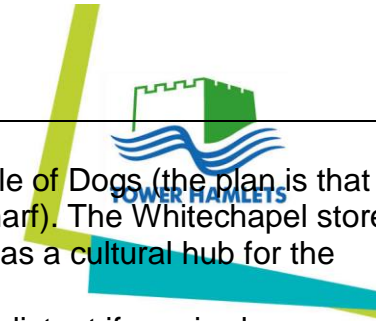
Section 2: General information about the proposal

Describe the proposal including the relevance of proposal to the general equality duties and protected characteristics under the Equality Act 2010

This proposal follows a period of public consultation on possible changes to the Idea Store and Library service. The original proposal was developed in order to help deliver £400K of an existing £1M saving (already included in the council’s Medium Term Financial Strategy) and also to deliver an additional saving of £600K to help the council develop a balanced budget in future years.

Failure to deliver this saving would put increased financial pressure on other parts of the council. Our original proposal was developed considering how people used our sites, their geographical spread, and the services each was able to offer.

We developed the following potential 5-year vision:



- **Four well placed Idea Stores** situated at Chrisp Street, Bow, a new site on the Isle of Dogs (the plan is that this site will be more centrally located on the island and replace Idea Store Canary Wharf). The Whitechapel store will be split across the current Idea Store Whitechapel and New Town Hall, acting as a cultural hub for the borough
- **All four sites will have some redesign** which will support people to stay socially distant if required
- **Bethnal Green Library and Idea Store Watney Market to be run as satellite sites for Idea Store Bow and Idea Store Whitechapel** respectively with a reduced service on offer
- **Our digital offer will continue to develop**

1.1 Our original proposal was to deliver a total of £1.6M by reshaping the service to take advantage of the uptake of self-service options in the past few years and by

- Keeping the four main sites (IS Whitechapel, Chrisp St, Bow and Canary Wharf) open 7 days a week and in the evenings. But:
 - Reducing the levels of staffing in the evenings
 - Reducing Sunday opening from 6 hours to 4
- Closing the Library service at the Cubitt Town Library
- Reducing opening hours at Bethnal Green Library from 50 to 15
- Reducing the size of IS Watney Market from 3 floors to 1 and its opening hours from 65 to 30
- We calculated that this would lead to a staffing reduction of circa 35 FTE

At its highest level the results of the public consultation show that:

1. Most people who completed the survey broadly agree with the overall 5 year vision but:
 - i. Most of them would rather we didn't make changes that impact the opening hours of the sites they use
2. Just over half of respondents either agree with one or other of the options in the public consultation or were ambivalent to them. However,
 - i. More people agreed with option 1 than agreed with option 2
3. The number of responses we received from people who use Cubitt Town Library (CTL) Bethnal Green Library (BGL) & IS Watney Market were disproportionately high when compared to Idea Store Members as a whole.



- i. We consider this a positive as it means we know that we have heard from those most likely to be impacted by the proposals, but it should be borne in mind.

1.2 Whilst arguably the consultation results could give us a mandate for this change, having listened to what people have told us we recommend that this proposal be adapted as follows:

1.3 **Deliver £1.6M by reshaping the service, including its management and back office, to take advantage of the uptake of self-service options and by:**

- **Keeping the four main sites (IS Whitechapel, Crisp St, Bow and Canary Wharf) open 7 days a week and in the evenings. But:**
 - Reducing the levels of staffing in the evenings
 - Reducing Sunday opening from 6 hours to 4
- Reducing opening hours at Cubitt Town Library so that it is open 10:00am till 6:00pm on Mondays and Wednesdays (16 hours)
- Reducing opening hours at Bethnal Green Library so that it is open 10:00am till 6:00pm on Mondays, Wednesdays and Thursdays (24 Hours)
- Reducing the size of IS Watney Market from 3 floors to 1 and opening it for 8 hours a day on Mondays, Wednesdays, Thursdays 10:00am till 6:00pm and Saturdays 9:00am-5:00pm (32 hours a week)

We calculate that this will lead to a reduction of circa 33 FTE (30 if you remove vacancies).

Section 3: Evidence (consideration of data and information)

What evidence do we have which may help us think about the impacts or likely impacts on residents, service users and other groups in the community who are likely to be affected by the proposal?

- Area profiles (mainly drawing on data from Census 2011)
- Idea Store service user data rolling year to October 2020Public consultation 'Help shape the future of Tower Hamlets' library service' (30 November 2020-29 January 2021)

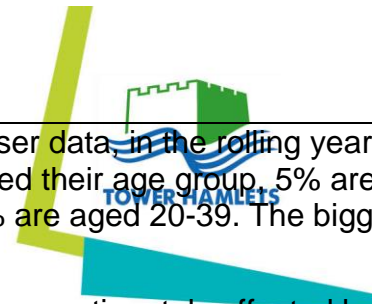


TOWER HAMLETS

Section 4: Assessing the impacts on different groups and service delivery

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?																
Protected																				
Age (All age groups)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Respondent comment:</p> <p><i>“My children are home-schooled so we rely on libraries for study space, to borrow books”.</i></p> <p>Respondent comment:</p> <p><i>“Children need a safe space outside the family home indoors that is free and it helps safeguard children who cannot think or behave freely in the home environment”.</i></p> <p><u>Idea Store Watney Market</u></p> <table border="1"> <thead> <tr> <th>Residents by age</th> <th>0-15</th> <th>16-64</th> <th>65+</th> </tr> </thead> <tbody> <tr> <td>Number</td> <td>3,181</td> <td>8,584</td> <td>889</td> </tr> <tr> <td>Percentage</td> <td>25.1%</td> <td>67.8%</td> <td>7%</td> </tr> <tr> <td>Tower Hamlets %</td> <td>19.7%</td> <td>74.1%</td> <td>6.1%</td> </tr> </tbody> </table> <p>There is a higher than average proportion of residents in the Shadwell ward who are aged 0-15 years old, and a higher than average proportion of those aged 65+. The proportion of residents of working age (16-64) was the 4th lowest in the borough.</p>	Residents by age	0-15	16-64	65+	Number	3,181	8,584	889	Percentage	25.1%	67.8%	7%	Tower Hamlets %	19.7%	74.1%	6.1%
Residents by age	0-15	16-64	65+																	
Number	3,181	8,584	889																	
Percentage	25.1%	67.8%	7%																	
Tower Hamlets %	19.7%	74.1%	6.1%																	

				<p>According to Idea Stores service user data, in the rolling year to October 2020, of those who declared their age group, 5% are aged 60+, 16% are aged 40-59 and 30% are aged 20-39. The biggest cohort are those aged 0-19 (49%)</p> <p>Younger people are likely to be disproportionately affected by the proposal as a change to the access to service and may have an impact on their educational attainment and access to IT. Also, they are the largest service user group when categorised by age.</p> <p>The proposal is also likely to have an impact on some older people on some days in some areas, as they would have to travel further to another site, and this may be difficult.</p> <p>However, as a result of the initial Equality Impact Assessment and the consultation, we are recommending to keep the library open for 32 hours in the week, 8 hours a day on Mondays, Wednesdays, Thursdays and Saturdays so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of the original proposal.</p> <p>The nearest Idea Store to Idea Store Watney Market that will remain open 7 days a week is Idea Store Whitechapel which is approximately 0.5 miles away and there are public transport links between the two Idea Stores and those service users that are aged under 18, 60+ and/or eligible for a Freedom pass should be able to travel at no cost.</p> <p>Resident Comment:</p> <p><i>“Many children live in overcrowded conditions in Tower Hamlets and Sundays are when they work on their homework and revision for their GCSEs and A levels”.</i></p>
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				<p><u>Idea Store Bow</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings, but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on people of different ages if the service is changed in this way.</p> <p><u>Idea Store Whitechapel</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on people of different ages if the service is changed in this way.</p> <p><u>Idea Store Canary Wharf</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on people of different ages if the service is changed in this way.</p> <p><u>Idea Store Chrisp Street</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on people of different ages if the service is changed in this way.</p>
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<u>Bethnal Green Library</u>			
Residents by age	0-15	16-64	65+
Number	3,728	14,351	1,229
Percentage	19.3	74.3	6.4
Tower Hamlets %	19.7	74.1	6.1

The ward has the highest proportion of 18-21-year olds in the borough. This is due to the location of the Queen Mary University. 11.7per cent of residents (2,267) are this age range, compared to the borough average of 6.7per cent.

According to Idea Stores service user data, in the rolling year to October 2020, of those who declared their age group, 19% are aged 60+, 19% are aged 40-59 and 26% are aged 0-19. The biggest cohort are those aged 20-39 (46%)

Due to difference in data categorisation a direct comparison of data sets is not possible. However, the data suggests that younger people (under 19s) may be disproportionately affected by the proposal as the proportion of younger service users is larger than the proportion of young people living in the ward and a change to the access to service is may have an impact on their educational attainment and access to IT.


The other group the service change may have an impact on is 20-39 age group as they are the largest service user group when categorised by age.

The proposal is likely to have an impact on older people as a reduction in service may affect access to library services and IT and can increase social isolation. Also, the proportion of older (60+) service users is larger than the proportion of older people living in the



				<p>ward.</p> <p>However, as a result of the initial Equality Impact Assessment and the consultation, we are recommending to keep the library open for 24 hours in the week, 8 hours on Monday, Wednesday and Thursday so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of the proposal.</p> <p>The nearest Idea Store to Bethnal Green Library that will remain open 7 days a week is Idea Store Whitechapel, which is approximately 0.5 miles away and there are public transport links between the two Idea Stores and those service users that are aged under 18, 60+ and/or eligible for a Freedom pass should be able to travel at no cost.</p> <p><u>Cubitt Town Library</u></p> <table border="1"> <thead> <tr> <th>Residents by age</th> <th>0-15</th> <th>16-64</th> <th>65+</th> </tr> </thead> <tbody> <tr> <td>Number</td> <td>2,256</td> <td>10,790</td> <td>485</td> </tr> <tr> <td>Percentage</td> <td>16.7%</td> <td>79.7%</td> <td>3.6%</td> </tr> <tr> <td>Tower Hamlets %</td> <td>19.7%</td> <td>74.1%</td> <td>6.1%</td> </tr> </tbody> </table> <p>The ward had the second lowest proportion of residents in the 65+ age range and the fifth highest proportion of residents aged between 16-64 years old.</p> <p>According to Idea Stores service user data, in the rolling year to October 2020, of those who declared their age group, 10% are aged 60+, 21% are aged 40-59 and 34% are aged 20-39. The biggest cohort are those aged 0-19 (35%).</p> <p>Due to difference in data categorisation a direct comparison of data sets is not possible. However, the data suggests that younger people</p>	Residents by age	0-15	16-64	65+	Number	2,256	10,790	485	Percentage	16.7%	79.7%	3.6%	Tower Hamlets %	19.7%	74.1%	6.1%
Residents by age	0-15	16-64	65+																	
Number	2,256	10,790	485																	
Percentage	16.7%	79.7%	3.6%																	
Tower Hamlets %	19.7%	74.1%	6.1%																	

				<p>(under 19s) are likely to be disproportionately affected by the proposal as the proportion of younger service users is larger than the proportion of young people living in the ward (they are the largest age group to be affected) and a change to the access to service is likely to have an impact on their educational attainment and access to IT.</p> <p>The proposal is likely to have an impact on older people as a reduction in service is likely to affect their access to library services, IT and can increase social isolation. Also, the proportion of older (60+) service users is larger than the proportion of older people living in the ward.</p> <p>Respondent comment:</p> <p><i>"This is the library I have used since childhood. I am now 81 years old. To get to another library I would have to travel far, and this is difficult for me at this age".</i></p> <p>However, as a result of the initial Equality Impact Assessment and the consultation, we are recommending to keep the library open for 16 hours in the week, 8 hours on Monday, Wednesday so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of the proposal,</p> <p>The nearest Idea Store to Cubitt Town Library that will remain open 7 days a week is Idea Store Canary Wharf which is approximately 1.2 miles away and there are public transport links between the two libraries and those service users that are aged under 18, 60+ and/or eligible for a Freedom pass should be able to travel with no cost.</p>
<p>Disability (Physical, learning difficulties,</p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><u>Respondent comment:</u></p> <p><i><u>"I come to the library to take out books which helps me with my anxiety and mental health. The groups over the years has been a</u></i></p>

<p>mental health, and medical conditions)</p>				<p><u>saving grace</u>".</p> <p><u>Respondent comment:</u></p> <p><u>"The libraries saved me when I was lonely and depressed"</u>.</p>  <p><u>Idea Store Watney Market</u></p> <p>On Census day, around 1,021 residents (8.1 per cent) in Shadwell had a long term health problem or disability '<i>limiting the persons day to day activities a lot</i>', while 7.9 per cent (1001 residents) had a long term health problem or disability '<i>limiting the persons day to day activities a little</i>'.</p> <p>In Shadwell, the rate of people with a long-term health problem or disability <i>limiting day to day activities a lot</i> was above the Tower Hamlets (6.8 per cent) and London rate (6.7 per cent) but below the England rate.</p> <p>In comparison, the rate of people with a long-term health problem or disability '<i>limiting day to day activities a little</i>' of 7.9 per cent was also above the Tower Hamlets (6.7 per cent) and London rates but again below the England average.</p> <p>According to Idea Stores service user data, in the rolling year to October 2020, of those who declared their status, 9% of service users considered themselves to have a disability. This is slightly more than the number of people in Shadwell who declared that they have a long term health problem or disability '<i>limiting the persons day to day activities a lot</i>', therefore disabled people are more likely to be affected by the service change.</p> <p>As there are a large proportion of disabled residents living in the ward compared to the average for Tower Hamlets it is highly likely to be disproportionally affected by the service change. We know from other areas that service change in libraries affects disabled people more</p>
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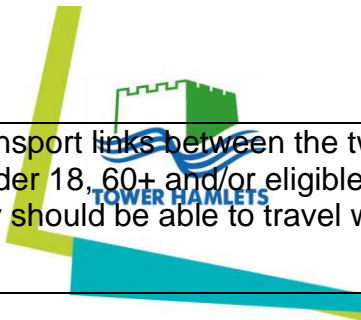
				<p>than people without disabilities as travelling further to access their nearest provisions is more difficult for this group.</p> <p>However, as a result of the initial Equality Impact Assessment and consultation, we are recommending to keep the library open for 32 hours in the week; 8 hours a day on Mondays, Wednesdays, Thursdays and Saturdays so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of the proposal. The nearest Idea Store to Idea Store Watney Market that will remain open 7 days a week is Idea Store Whitechapel which is approximately 0.5 miles away and there are bus links (with transfers) between the two Idea Stores and service users aged under 18, 60+ and/or eligible for a Freedom pass due to their disability should be able to travel with no additional cost.</p> <p><u>Idea Store Bow</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on disabled people if the service is changed in this way.</p> <p><u>Idea Store Whitechapel</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on disabled people if the service is changed in this way.</p> <p><u>Idea Store Canary Wharf</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in</p>
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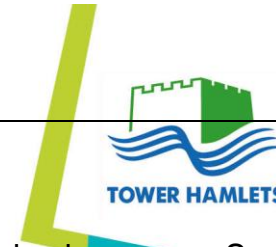
				<p>the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on disabled people if the service is changed in this way.</p> <p><u>Idea Store Chrisp Street</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on disabled people if the service is changed in this way.</p> <p><u>Bethnal Green Library</u></p> <p>On Census day, around 1,336 residents (6.9 per cent) in Bethnal Green had a long term health problem or disability '<i>limiting the persons day to day activities a lot</i>', while around 7.1 per cent (1,362 residents) had a long term health problem or disability '<i>limiting the persons day to day activities a little</i>'.</p> <p>In Bethnal Green, the rate of people with a long-term health problem or disability '<i>limiting day to day activities a lot</i>' was close to the Tower Hamlets (6.8 per cent) and London rate (6.7 per cent).</p> <p>In Bethnal Green, the rate of people with a long-term health problem or disability '<i>limiting day to day activities a little</i>' was slightly above the Tower Hamlets rate (6.7 per cent) but below the London rate (7.4 per cent).</p> <p>According to Idea Stores service user data, in the rolling year to October 2020, of those who declared their status, 8% of service users considered themselves to have a disability. This slightly more than the number of people in Bethnal Green and Tower Hamlets as a whole who declared that they have a long-term health problem or</p>
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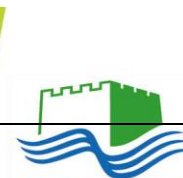
				<p>disability 'limiting day to day activities a lot'</p> <p>We know that service change in libraries affects disabled people more than people without disabilities as travelling further to access their nearest provisions is more difficult for this group.</p> <p>However, as a result of the initial Equality Impact Assessment and the consultation, we are recommending to keep the library open for 24 hours in the week, 8 hours on Monday, Wednesday and Thursday so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of the proposal.</p> <p>The nearest Idea Store to Bethnal Green Library that will remain open 7 days a week is Idea Store Whitechapel which is approximately 0.5 miles away and there are bus links between the libraries and between the two Idea Stores and service users aged under 18, 60+ and/or eligible for a Freedom pass due to their disability should be able to travel with no additional cost.</p> <p><u>Cubitt Town Library</u></p> <p><u>Respondent comment:</u></p> <p><i>"I'm registered Visually Impaired. Cubitt Town is easily accessible for me and the staff are very aware of my needs. Having to travel further is difficult for me".</i></p> <p>On Census day, around 583 residents (4.3 per cent) in Blackwall & Cubitt Town had a long term health problem or disability limiting the persons day to day activities a lot, while around 4.4 per cent (602 residents) had a long term health problem or disability limiting the persons day to day activities a little.</p>
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			 <p>In Blackwall and Cubitt Town, the rate of people with a long-term health problem or disability limiting day to day activities a lot was significantly below the Tower Hamlets (6.8 per cent) and London rate (6.7 per cent).</p> <p>In a similar way, the rate of people with a long-term health problem or disability limiting day to day activities a little was also below the Tower Hamlets rate (6.7 per cent) but below the London rate (7.4 per cent).</p> <p>According to Idea Stores service user data, in the rolling year to October 2020, of those who declared their status, 10% of service users considered themselves to have a disability. This is more than the number of people in Blackwall and Cubitt Town who declared that they have a long-term health problem or disability '<i>limiting the person's day to day activities a lot</i>'.</p> <p>As there are more disabled people living in the ward compared to the average for Tower Hamlets and the percentage of services users who consider themselves disabled is more than the average for the ward it is highly likely that disabled people will be disproportionately affected by the service change. Furthermore, we know that service change in libraries affects disabled people more than people without disabilities as travelling further to access their nearest provisions is more difficult for this group.</p> <p>However, as a result of the initial Equality Impact Assessment and the consultation, we are recommending to keep the library open for 16 hours in the week, 8 hours on Monday, Wednesday so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of the proposal,</p> <p>The nearest Idea Store to Cubitt Town Library that will remain open 7 days a week is Idea Store Canary Wharf, which is approximately 1.2</p>
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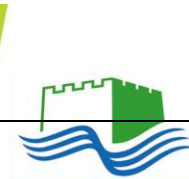
				 <p>miles away and there are public transport links between the two libraries and service users aged under 18, 60+ and/or eligible for a Freedom pass due to their disability should be able to travel with no additional cost.</p>
Sex	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p><u>Idea Store Watney Market</u></p> <p>The ward had 6,462 males and 6,192 females providing a gender split in the ward of 51.1 per cent male and 48.9 per cent female. According to Idea Stores service user data, in the rolling year to October 2020, of those who declared their sex, 55% were female (higher than the male-female split in the ward).</p> <p>Also, we know anecdotally that women more often access our services designed for parents and children such as ‘story time’. Therefore, it is highly likely that they will be disproportionately affected by the service change than other groups.</p> <p>If this option is taken forward the new opening hours will need to be designed based on feedback from residents and service users.</p> <p>However, as a result of the initial Equality Impact Assessment and consultation, we are recommending to keep the library open for 32 hours in the week; 8 hours a day on Mondays, Wednesdays, Thursdays and Saturdays so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of the proposal.</p> <p>The nearest Idea Store to Idea Store Watney Market that will remain open 7 days a week is Idea Store Whitechapel which is approximately 0.5 miles away and there are public transport links between the two Idea Stores and those service users aged under 18, 60+ and/or eligible for a Freedom pass due to their disability should be able to</p>




				<p>travel with no additional cost.</p> <p><u>Idea Store Bow</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on different sexes if the service is changed in this way.</p> <p><u>Idea Store Whitechapel</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on different sexes if the service is changed in this way.</p> <p><u>Idea Store Canary Wharf</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on different sexes if the service is changed in this way.</p> <p><u>Idea Store Chrisp Street</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on different sexes if the service is changed in this way.</p>
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				<p><u>Bethnal Green Library</u></p> <p>The Bethnal Green ward had 9,616 males and 9,692 females providing a gender split in the ward of 49.8 per cent male and 50.2 per cent female. The proportion of females in this ward was slightly higher than the average for the borough.</p> <p>However, according to Idea Stores service user data, in the rolling year to October 2020, of those who declared their sex, 59% were female (higher than the male-female split in the ward).</p> <p>Also, we know anecdotally that women more often access our services designed for parents and children such as ‘story time’. Therefore, it is highly likely that they will be disproportionately affected by the service change than other groups</p> <p>However, as a result of the initial Equality Impact Assessment and the consultation, we are recommending to keep the library open for 24 hours in the week, 8 hours on Monday, Wednesday and Thursday so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of the proposal.</p> <p>The nearest Idea Store to Bethnal Green Library that will remain open 7 days a week is Idea Store Whitechapel which is approximately 0.5 miles away and there are public transport links between the two Idea Stores and service users aged under 18, 60+ and/or eligible for a Freedom pass due to their disability should be able to travel with no additional cost.</p> <p><u>Cubitt Town Library</u></p> <p>The ward had 7,121 males and 6,410 females providing a gender split in the ward of 52.6 per cent male and 47.4 per cent female. There were just over 700 more males than females resident in the</p>
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				<p>ward.</p> <p>However, according to Idea Stores service user data, in the rolling year to October 2020, of those who declared their sex, 59% were female (higher than the male-female split in the ward).</p> <p>Also, we know anecdotally that women more often access our services designed for parents and children such as 'story time'. Therefore, it is highly likely that they will be disproportionately affected by the service change than other groups.</p> <p>However, as a result of the initial Equality Impact Assessment and the consultation, we are recommending to keep the library open for 16 hours in the week, 8 hours on Monday, Wednesday so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of the proposal.</p> <p>The nearest Idea Store to Cubitt Town Library that will remain open 7 days a week is Idea Store Canary Wharf which is approximately 1.2 miles away and there are public transport links between the two libraries and service users aged under 18, 60+ and/or eligible for a Freedom pass due to their disability should be able to travel with no additional cost.</p>
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>We do not have local data or collect service user data for this characteristic. During consultation, there was not any particular negative impact highlighted by respondents. We do not anticipate any disproportionate negative impact on this group.</p>
Marriage and civil	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>We do not have local data or collect service user data for this characteristic. During consultation, there was not any particular negative impact highlighted by respondents. We do not anticipate any</p>

<p>partnership</p>				<p>disproportionate negative impact on this group</p> 
<p>Religion or philosophical belief</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>	<p><u>Idea Store Watney Market</u></p> <p>At 54.8 per cent of the population, the proportion of Muslim residents was the highest of all 20 wards in the borough. During consultation, there was not any particular negative impact highlighted by respondents. We do not anticipate any disproportionate negative impact on this group.</p> <p>As a result of the initial Equality Impact Assessment and consultation, we are recommending to keep the library open for 32 hours in the week; 8 hours a day on Mondays, Wednesdays, Thursdays and Saturdays so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of the proposal.</p> <p>The nearest Idea Store to Idea Store Watney Market that will remain open 7 days a week is Idea Store Whitechapel which is approximately 0.5 miles away and there are public transport links between the two Idea Stores and service users aged under 18, 60+ and/or eligible for a Freedom pass due to their disability should be able to travel with no additional cost.</p> <p><u>Idea Store Bow</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on people from different religion and beliefs if the service is changed in this way.</p>



				<p><u>Idea Store Whitechapel</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on people from different religion and beliefs if the service is changed in this way.</p> <p><u>Idea Store Canary Wharf</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings, but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on people from different religions and beliefs if the service is changed in this way.</p> <p><u>Idea Store Chrisp Street</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on people from different religions and beliefs if the service is changed in this way.</p> <p><u>Bethnal Green Library</u></p> <p>The proportion of residents who identified themselves as either Christian (25.8 per cent) or Muslim (34 per cent) was slightly lower than the borough average for those groups.</p> <p>4,255 of the ward's population explicitly stated that they had no religion, accounting for 21.9 per cent of the ward population</p>
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			<p>During consultation, there was not any particular negative impact highlighted by respondents. We do not anticipate any disproportionate negative impact on this group.</p> <p>As a result of the initial Equality Impact Assessment and the consultation, we are recommending to keep the library open for 24 hours in the week, 8 hours on Monday, Wednesday and Thursday so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of the proposal.</p> <p>The nearest Idea Store to Bethnal Green Library that will remain open 7 days a week is Idea Store Whitechapel which is approximately 0.5 miles away and there are public transport links between the two Idea Stores and service users aged under 18, 60+ and/or eligible for a Freedom pass due to their disability should be able to travel with no additional cost.</p> <p><u>Cubitt Town Library</u></p> <p>The proportion of residents who identified themselves as Christian (32.8 per cent) was higher than the borough average.</p> <p>2,988 residents in the Blackwall and Cubitt Town ward explicitly stated that they had no religion.</p> <p>During consultation, there was not any particular negative impact highlighted by respondents. We do not anticipate any disproportionate negative impact on this group.</p> <p>As a result of the initial Equality Impact Assessment and the consultation, we are recommending to keep the library open for 16 hours in the week, 8 hours on Monday, Wednesday so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of</p>
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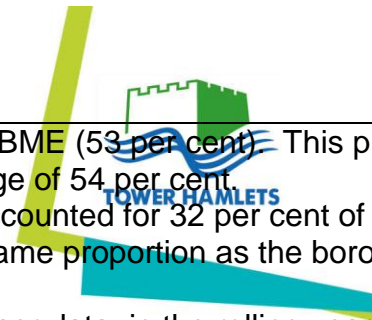




				<p>the proposal.</p> <p>The nearest Idea Store to Cubitt Town Library that will remain open 7 days a week is Idea Store Canary Wharf which is approximately 1.2 miles away and there are public transport links between the two libraries and service users aged under 18, 60+ and/or eligible for a Freedom pass due to their disability should be able to travel with no additional cost.</p>
Race	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p><u>Idea Store Watney Market</u></p> <p>At the time of the 2011 Census, 9,007 residents in the ward were BME (71 per cent). This proportion was significantly higher than the borough average of 54 per cent.</p> <p>Residents of Bangladeshi origin accounted for 52 per cent of the population (6,585 residents). This was higher than the borough average (32 per cent).</p> <p>According to Idea Stores service user data, in the rolling year to October 2020, of those who declared their ethnicity, 49% were of Bangladeshi origin (the largest by far) while only 14% were from White British background.</p> <p>As a result of the initial Equality Impact Assessment and consultation, we are recommending to keep the library open for 32 hours in the week; 8 hours a day on Mondays, Wednesdays, Thursdays and Saturdays so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of the proposal.</p> <p>The nearest Idea Store to Idea Store Watney Market that will remain open 7 days a week is Idea Store Whitechapel which is approximately 0.5 miles away and there are public transport links between the two Idea Stores and service users aged under 18, 60+ and/or eligible for a Freedom pass due to their disability should be able to travel with no</p>



				<p>additional cost.</p> <p><u>Idea Store Bow.</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on people from different ethnic backgrounds if the service is changed in this way.</p> <p><u>Idea Store Whitechapel</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on people from different ethnic backgrounds if the service is changed in this way.</p> <p><u>Idea Store Canary Wharf</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on people from different ethnic backgrounds if the service is changed in this way.</p> <p><u>Idea Store Chrisp Street</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on people from different ethnic backgrounds if the service is changed in this way.</p> <p><u>Bethnal Green Library</u></p>
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			<p>10,143 residents in the ward were BME (53 per cent). This proportion was lower than the borough average of 54 per cent. Residents of Bangladeshi origin accounted for 32 per cent of the population (6,130 residents), the same proportion as the borough average.</p> <p>According to Idea Stores service user data, in the rolling year to October 2020, of those who declared their ethnicity, 34% were of White British, 24% were of White Other and 20% were of Bangladeshi origin.</p> <p>As a result of the initial Equality Impact Assessment and the consultation, we are recommending to keep the library open for 24 hours in the week, 8 hours on Monday, Wednesday and Thursday so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of the proposal.</p> <p>The nearest Idea Store to Bethnal Green Library that will remain open 7 days a week is Idea Store Whitechapel which is approximately 0.5 miles away and there are public transport links between the two Idea Stores and service users aged under 18, 60+ and/or eligible for a Freedom pass due to their disability should be able to travel with no additional cost.</p> <p><u>Cubitt Town Library</u></p> <p>At the time of the 2011 Census, 6,788 residents in the ward were BME (50 per cent). This proportion was lower than the borough average of 54 per cent.</p> <p>Residents of Bangladeshi origin accounted for 15 per cent of the population (1,965 residents), a lower proportion than the borough average of 32 per cent.</p> <p>According to Idea Stores service user data, in the rolling year to</p>
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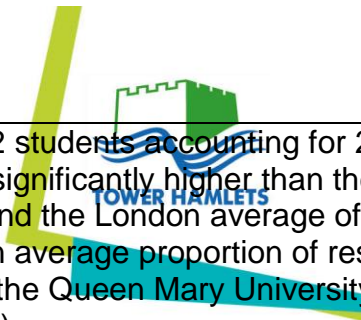
				<p>October 2020, of those who declared their ethnicity, 24% were of White British, 20% were of White Other and 19% were of Bangladeshi origin.</p> <p>As a result of the initial Equality Impact Assessment and the consultation, we are recommending to keep the library open for 16 hours in the week, 8 hours on Monday, Wednesday so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of the proposal,</p> <p>The nearest Idea Store to Cubitt Town Library that will remain open 7 days a week is Idea Store Canary Wharf which is approximately 1.2 miles away and there are public transport links between the two libraries and service users aged under 18, 60+ and/or eligible for a Freedom pass due to their disability should be able to travel with no additional cost.</p>
Sexual orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>One person expressed a concern that loss of access to materials could disadvantage this group, but we believe the amended proposal will mitigate this. We do not anticipate any disproportionate negative impact on this group</p> <p>Respondent comment:</p> <p><i>“We are concerned that the loss of local library will prevent some LGBT+ people accessing information that they don't have access to via schools and cant access safely from their own homes, especially for those who are not able to travel to far from home”.</i></p>
Pregnancy and				During consultation, there was not any particular negative impact

maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	highlighted by respondents. We do not anticipate any disproportionate negative impact on this group.
Other				
Socio-economic	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p><u>Respondent comment:</u></p> <p><i><u>“People use it (library) as a safe place to get away from their four walls and save on heating bills. I hope to use it in retirement. Not everyone can buy books”.</u></i></p> <p><u>Idea Store Watney Market</u></p> <p>19.2 per cent of residents were classified as long term unemployed / never employed (1,743 residents), a higher than the borough average of 13.5 per cent.</p> <p>Lack of access to IT provisions may particularly impact on those unemployed and studying.</p> <p>However, as a result of the initial Equality Impact Assessment and consultation, we are recommending to keep the library open for 32 hours in the week; 8 hours a day on Mondays, Wednesdays, Thursdays and Saturdays so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of the proposal.</p> <p>The nearest Idea Store to Idea Store Watney Market that will remain open 7 days a week is Idea Store Whitechapel which is approximately 0.5 miles away and there are public transport links between the two Idea Stores and service users aged under 18, 60+ and/or eligible for a Freedom pass due to their disability should be able to travel with no additional cost.</p>




			<p><u>Idea Store Bow</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on people from different socio-economic groups if the service is changed in this way.</p> <p><u>Idea Store Whitechapel</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on people from different socio-economic groups if the service is changed in this way.</p> <p><u>Idea Store Canary Wharf</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on people from different socio-economic groups if the service is changed in this way.</p> <p><u>Idea Store Chrisp Street</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on people from different socio-economic groups if the service is changed in this way.</p> <p><u>Bethnal Green Library</u></p> <p>At the time of the Census, Bethnal Green ward had the highest proportion of residents in the borough who identified themselves as</p>
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				<p>full time students. There were 3,582 students accounting for 24 per cent of the ward population, this is significantly higher than the borough average of 14.9 per cent and the London average of 11 per cent. The reason for the higher than average proportion of residents aged 18-21 in the ward is because the Queen Mary University is located within the ward (see page 3).</p> <p>There are slightly fewer residents who were classified as long term unemployed / never worked in this ward (12.5 per cent compared to the borough average of 13.5 per cent).</p> <p>The higher managerial & administrative and lower managerial & administrative professional classifications are broken down as 9.2 per cent and 19.3 per cent respectively. There is a significantly lower proportion of this group in the ward than both the borough and London average.</p> <p>As a result of the initial Equality Impact Assessment and the consultation, we are recommending to keep the library open for 24 hours in the week, 8 hours on Monday, Wednesday and Thursday so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of the proposal.</p> <p>The nearest Idea Store to Bethnal Green Library that will remain open 7 days a week is Idea Store Whitechapel which is approximately 0.5 miles away and there are public transport links between the two Idea Stores and service users aged under 18, 60+ and/or eligible for a Freedom pass due to their disability should be able to travel with no additional cost.</p> <p>As there are slightly less residents who were classified as long term unemployed / never worked in this ward most of the residents should be able to meet the cost of travel.</p> <p><u>Cubitt Town Library</u></p>
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				<p>At the time of the Census, the majority of working aged residents in the Blackwall and Cubitt Town ward worked in higher & lower managerial, administration & professional occupations, compared to the borough average of 36.1 per cent.</p> <p>There were fewer residents who were classified as long term unemployed / never worked in this ward (8.5 per cent compared to the borough average of 13.5 per cent).</p> <p>However, as a result of the initial Equality Impact Assessment and the consultation, we are recommending to keep the library open for 16 hours in the week, 8 hours on Monday, Wednesday so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of the proposal.</p> <p>The nearest Idea Store to Cubitt Town Library that will remain open 7 days a week is Idea Store Canary Wharf which is approximately 1.2 miles away and there are public transport links between the two libraries and service users aged under 18, 60+ and/or eligible for a Freedom pass due to their disability should be able to travel with no additional cost.</p> <p>As according to the latest Census the majority of working aged residents in the Blackwall and Cubitt Town ward worked in higher & lower managerial, administration & professional occupations, compared to the borough average of 36.1 per cent most of the residents should be able to meet the cost of travel.</p>
<p>Parents/Carers</p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><u>Idea Store Watney Market</u></p> <p>At the time of the Census, 27.2 per cent of all residents in the ward lived in family households with dependent children; this proportion was higher than the borough average of 46.2 per cent. However, families with dependent children occupied 35.1 percent of</p>

				 <p>the households in the ward, higher than the borough average of 26.6 per cent.</p> <p>Around 8.8 per cent of residents in Shadwell provided unpaid care. The Shadwell rate was above the Tower Hamlets (7.6 per cent), London (8.4 per cent) and England (10.2 per cent) rates.</p> <p>From 1,111 residents in Shadwell who provided unpaid care, around 198 residents provided care for 20 to 49 hours a week, while 304 residents provided care for 50 or more hours a week.</p> <p>The proportion of those providing unpaid care for 50 hours or more of 2.4 per cent in Shadwell was above Tower Hamlets (1.9 per cent) and London (1.8 per cent) averages.</p> <p>Parents and carers are more likely to be impacted by a lack of access to library services and IT.</p> <p>However, as a result of the initial Equality Impact Assessment and consultation, we are recommending to keep the library open for 32 hours in the week; 8 hours a day on Mondays, Wednesdays, Thursdays and Saturdays so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of the proposal.</p> <p>The nearest Idea Store to Idea Store Watney Market that will remain open 7 days a week is Idea Store Whitechapel which is approximately 0.5 miles away and there are public transport links between the two Idea Stores and service users aged under 18, 60+ and/or eligible for a Freedom pass due to their disability should be able to travel with no additional cost.</p> <p><u>Idea Store Bow</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating</p>
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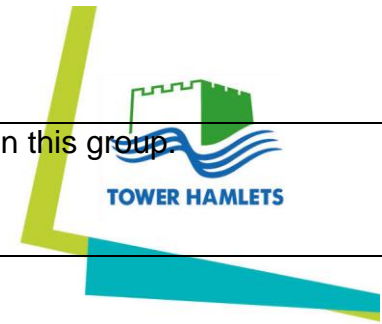
				<p>the same number of hours for most of the week therefore there will only be a minimal impact on parents/carers if the service is changed in this way.</p> <p><u>Idea Store Whitechapel</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on parents/carers if the service is changed in this way.</p> <p><u>Idea Store Canary Wharf</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on parents/carers if the service is changed in this way.</p> <p><u>Idea Store Chrisp Street</u></p> <p>This option proposes reduced opening hours on a Sunday and staff in the evenings but the library will remain open 7 days a week operating the same number of hours for most of the week therefore there will only be a minimal impact on parents/carers if the service is changed in this way.</p> <p><u>Bethnal Green Library</u></p> <p>47.4 per cent of all residents in the Bethnal Green ward lived in family households with dependent children. However, family households with dependent children occupied 28.3 per cent of the households in the ward. This proportion was higher than the borough average of 19.3 per cent and the London average of</p>
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				 <p>22.4 per cent.</p> <p>Around 7.6 per cent of residents in Bethnal Green provided unpaid care. The Bethnal Green rate was the same as the Tower Hamlets average but below London (8.4 per cent) and England (10.2 per cent) averages.</p> <p>From 1,472 residents in Bethnal Green who provided unpaid care, around 247 residents provided care for 20 to 49 hours a week, while 394 residents provided care for 50 or more hours a week.</p> <p>The proportion of those providing unpaid care for 50 hours or more of 2 per cent in Bethnal Green was slightly above the Tower Hamlets (1.9 per cent) and London (1.8 per cent) averages.</p> <p>Parents and carers may be impacted by a lack of access to library services and IT.</p> <p>However, as a result of the initial Equality Impact Assessment and the consultation, we are recommending to keep the library open for 24 hours in the week, 8 hours on Monday, Wednesday and Thursday so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of the proposal.</p> <p>The nearest Idea Store to Bethnal Green Library that will remain open 7 days a week is Idea Store Whitechapel which is approximately 0.5 miles away and there are public transport links between the two Idea Stores and service users aged under 18, 60+ and/or eligible for a Freedom pass due to their disability should be able to travel with no additional cost.</p> <p><u>Cubitt Town Library</u></p> <p>At the time of the Census, 37.9 per cent of all residents in the ward lived in family households with dependent children; this proportion was lower than the borough average of 46.2 per cent.</p> <p>However, families with dependent children occupied 21.9 percent of</p>
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				<p>the households in the ward, lower than the borough average of 26.6 per cent.</p> <p>Around 5.8 per cent of residents in Blackwall and Cubitt Town provided unpaid care. The Blackwall and Cubitt Town rate was below the Tower Hamlets (7.6 per cent), London (8.4 per cent) and England (10.2 per cent) averages.</p> <p>From 784 residents in Blackwall and Cubitt Green who provided unpaid care, around 127 residents provided care for 20 to 49 hours a week, while 162 residents provided care for 50 or more hours a week.</p> <p>The proportion of those providing unpaid care for 50 hours or more of 1.2 per cent in Blackwall and Cubitt Town was slightly below the Tower Hamlets (1.9 per cent) and London (1.8 per cent) averages.</p> <p>Parents and carers may be impacted by a lack of access to library services and IT.</p> <p>However, as a result of the initial Equality Impact Assessment and the consultation, we are recommending to keep the library open for 16 hours in the week, 8 hours on Monday, Wednesday so that most service users including the above groups can still access the service. This is being recommended to mitigate against some of the impact of the proposal</p> <p>The nearest Idea Store to Cubitt Town Library that will remain open 7 days a week is Idea Store Canary Wharf which is approximately 1.2 miles away and there are public transport links between the two libraries and service users aged under 18, 60+ and/or eligible for a Freedom pass due to their disability should be able to travel with no additional cost.</p>
<p>People with different Gender</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>	<p>During consultation there was not any particular negative impact highlighted by respondents. We do not anticipate any</p>



Identities e.g. Gender fluid, Non-Binary etc				disproportionate negative impact on this group
Any other groups	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A



Section 5: Impact analysis and action plan

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Update on progress
<ul style="list-style-type: none"> Implement the amended proposal which keeps 2 days at Cubitt Town Library, No index entries found. 	Keep Idea Store Watney Market open on Mondays, Wednesdays, Thursdays and Saturdays for 8 hours a day (32 hours a week)	[Cabinet date, date of implementation]	Teresa Heaney	This has been embedded within the recommended proposal




Section 6: Monitoring


What monitoring processes have been put in place to check the delivery of the above action plan and impact on equality groups?

We will continue to monitor processes and gather feedback through formal channels (CIPFA Public Library User Survey), adult learning evaluation, residents satisfaction surveys, as well as informally.

Appendix A

EIA decision rating

Decision	Action	Risk
<p>As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act and appropriate mitigations cannot be put in place to mitigate against negative impact. It is recommended that this proposal be suspended until further work is undertaken.</p>	<p>Suspend – Further Work Required</p>	<p>Red</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.</p>	<p>Further (specialist) advice should be taken</p>	<p>Red Amber</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Impact analysis and action plan</i> section of this document.</p>	<p>Proceed pending agreement of mitigating action</p>	<p>Amber</p> 

<p>Cabinet</p> <p>3 March 2021</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Denise Radley, Corporate Director – Health, Adults and Community</p>	<p>Classification: Unrestricted</p>
<p>Revised approach to day support in adult social care</p>	

Lead Member	Councillor Rachel Blake, Cabinet Member for Adults Health and Wellbeing
Originating Officer(s)	<ul style="list-style-type: none"> - Claudia Brown (Divisional Director, Adult Social Care) - Warwick Tomsett (Joint Director, Integrated Commissioning) - Joanne Starkie (Head of Strategy and Policy – Health, Adults and Community)
Wards affected	All wards
Key Decision?	Yes
Reason for Key Decision	Significant impact on wards
Forward Plan Notice Published	3 December 2020
Strategic Plan Priority / Outcome	Priority 1, Outcome 3 from the Strategic Plan 2020-23

Executive Summary

This report recommends changes to day support in adult social care, in line with the proposals set out in the 28 October 2020 Cabinet report. Day support can be broadly defined as support and activities outside the home and during the daytime for adults who need care and support under the 2014 Care Act. Day centres are one aspect of day support: The Council runs five day centres and also commissions from the voluntary, community and independent sector. We currently invest £7.1m in day services provision, with £1.9m in in-house provision and the remainder in commissioned services.

In October 2020, a report to the Mayor and Cabinet described a proposal for the future of day support. The main four proposals were:

1. To have fewer day centre service buildings overall, including a proposal for Physical Disability Day Opportunities, Riverside day centre and Pritchard’s Road day centre to not reopen and formally close on 31 March 2021.
2. To use day service buildings as community support hubs.
3. To help people who need adult social care to use a bigger range of daytime activities.
4. To support people to organise their own support through direct payments.

The October report described the reasons behind these proposals and asked Cabinet to note the intention to start public consultation on them.

This report presents the outcome of that consultation, which ran from 9 November 2020 to 4 January 2021. 191 responses to the public consultation were received through a variety of mediums that included a postal survey sent to all day support service users, an online survey and a series of virtual and face-to-face meetings. Of the 95 respondents who provided information on themselves, 40 were day service users, 39 were unpaid carers of day service users and three were advisors helping service users to complete the consultation.

The key messages from the consultation were as follows:

- Overall, the vast majority of respondents did not support the proposal to formally close Physical Disability (PD) Day Opportunities, Riverside and Pritchard's Road day centres. What came out strongly in the consultation is the range of things that service users and carers value about existing day centres and services. We believe these can be carried into the new proposed model. These were: The ability for people to come together and socialise, the ability to go to a safe and inclusive space with access to support staff when needed, the ability to form a structure or routine if preferred and access to activities that build skills, confidence and improve mental and physical health.
- A number of respondents raised concerns about change happening. There were very mixed levels of interest from Pritchard's Road, Riverside and PD Day Opportunities respondents in alternative provision, with direct payments and attending a day service over the weekend the most preferred.
- The main barriers people say make it harder to get out and about in their communities are transport and the need for support, encouragement and clear information.

This report makes final recommendations in relation to day support in light of:

- Our strategic aims
- The findings of the Toynbee Hall coproduction exercise carried out in summer 2020
- The consultation results
- The results of the Equality Analysis
- An evaluation of the options available (including value for money)

As a result, the recommendations for the future model of day support for older people, adults with a physical disability and adults with a mental health issue for both current and future service users can be summarised as follows:

1. To close Physical Disability Day Opportunities, Riverside day centre and Pritchard's Road day centre with effect from 4 May 2021. Whilst it is clear that these services are valued, there is a strong rationale for change described in the report and we believe that excellent alternative provision is available and/or is being developed, including suitable alternative provision for people with the highest level of need. Service users from the three services can transition to new forms of support earlier than May 2021 depending on their needs and wishes.
2. To develop Russia Lane as a 'dementia hub' day service, providing specialist support to those with dementia and respite to unpaid carers. As a hub, the service will continue to support service users to access a range of tailored events in the community and will 'bring the community in' for service users whose needs are such that their ability to go out and about in the community will be limited. We will work to extend the opening of Russia Lane to weekends to have a more flexible service that meets the needs and interests of service users and carers.
3. To launch a community support hub from May 2021 onwards. The vision is for this to be a flexible 'base' for people to access the huge and vibrant range of activities that are available to people living in Tower Hamlets, dropping in and out of the building itself as needed; whilst providing a safe and inclusive space and incorporating the

things that service users have told us are important to them. In addition, there will be strong links with reablement, a network of volunteers, a coalition of community partners, digital inclusion and supporting people to be as independent as possible. Sonali Gardens will extend its current provision to provide the community support hub¹.

4. To initiate the development of Sonali Gardens as a community hub, three projects will start in May 2021: A community access project, a peer-led groups project and a digital inclusion project. These projects will be adapted as they develop, and learning will be used to inform the ongoing future approach. The community support hub will have strong links to activities and support available in Linkage Plus centres. Activities will be run from the community support hubs but also a wide range of venues and 'spokes'. We envisage these including the Pritchard's Road building, Linkage Plus centres, Idea Stores and an accessible site on the Isle of Dogs. The community support hub will have strong links to activities and support available in Linkage Plus centres, as well as providing space for peer support groups and activities supported by Personal Assistants.
5. To encourage more people to organise their own day support through a direct payment. In the context of day support, this could mean the cost of daytime activities (e.g. a yoga class) or the cost of a Personal Assistant to enable someone to get out and about – potentially using the community support hub as a base. The option also exists for a group of service users to pool their direct payments together to fund services as a group and we will support service users to consider this option as part of our emerging Personalisation Plan work.
6. To make Tower Hamlets a more inclusive place for people with care and support needs. The consultation results identify inaccessible transport is a key barrier to people getting out and about easily, and the report recommends an approach to this in line with our Travel Assistance policy. The report goes on to recommend that capital development funds be sought to develop at least two more fully accessible toilet and changing sites in the borough.
7. The report also proposes further investment in and awareness raising of the Shared Lives service so that this model can be expanded as an option for new and existing service users.
8. Finally, the report recommends action to ensure service users from PD Day Opportunities, Riverside and Pritchard's Road day centres receive support through this period of change. A Community Support Worker for Pritchard's Road service users will be recruited to fulfil this purpose. Part of the role of practitioners, staff in the community support hubs and other day service provision will also be to support and encourage people in this way.

These recommendations will have a direct impact on the 24 full-time equivalent (FTE) staff posts – of which six are currently vacant - who work in the three in-house day centres we are proposing to close and the 86 service users who are currently receiving support from them. The proposal will also have an impact on the staff, service users and carers who use other provision such as Sonali Gardens.

These recommendations include previously agreed savings of £316,000 per year from 2021-22 and additional savings of £253,000 as part of the 2021-24 Medium-Term Financial Strategy. £0.452 is to be reinvested on an annual basis and is anticipated to be used to fund:

- A fixed-term Community Support Worker post between May 2021 and March 2022.

¹ A procurement exercise that will impact day services provided at Sonali Gardens and Sundial Centre will start in 2021 with a new contract start date of April 2022. We will look at options for sites, delivery and procurement as part of this. The procurement exercise will run alongside the procurement for Linkage Plus, enabling us to design and commission these services as a cohesive picture of day support.

- Direct payments for a proportion of service users, noting that 22% of all adult social care users currently organise their support in this way.
- Alternative external placements for those who need them (e.g. at Russia Lane or Headway day service in Hackney) for approximately 14 service users, depending on their needs and wishes.
- A Shared Lives Coordinator and shared lives programme costs.
- The extension of opening Russia Lane day service to weekends.
- Additional training for day support staff.
- Additional staff, activities and materials for the community support hub and spokes²

We will also seek to access funding to:

- Provide more accessible toilet and changing facilities in the borough
- Provide more IT and assistive technology infrastructure in day services and the community support hubs.

Recommendations:

The Cabinet is recommended to:

1. Agree the closure of Physical Disability Day Opportunities, Riverside day centre and Pritchard's Road day centre with effect from 4 May 2021
2. Agree to develop Russia Lane as a 'dementia hub' day service
3. Agree to open a community support hub from May 2021 onwards (if it is safe to do so in light of the Covid-19 pandemic)
4. Endorse the proposal to encourage more people to organise their own day support through a direct payment
5. Agree the commitment to make Tower Hamlets a more inclusive place for people with care and support needs.

1. REASONS FOR THE DECISIONS

- 1.1 The rationale for changing day support can be summarised as follows:
 - Our current approach is not fully in line with our strategic aims – by this we mean, a focus on promoting independence, inclusion, working with people in a strengths-based way and ensuring services are personalised.
 - We are facing significant financial pressures that have been worsened as a result of the pandemic and therefore need to make savings – we are focusing on the cost of services and opportunities to continue to provide good quality support at less cost.
 - We need to consider what day support should look like in a 'post-Covid' world.
 - Some in-house day centres were underutilised prior to the pandemic.
- 1.2 The recommendations on how to change day support have been made as a result of:
 - Our strategic aims
 - The findings of the Toynbee Hall coproduction exercise

² In addition to the existing commissioning funding envelope.

- The consultation results described in this report
- The results of the Equality Analysis
- An evaluation of the options available (including value for money)

2. **ALTERNATIVE OPTIONS**

- 2.1 Do not agree with the recommendations. This is not recommended due to the reasons given above and would require an alternative savings proposal to be developed.
- 2.2 Suggest an alternative proposal. The report includes a rationale for the detail of the proposal. The consultation results include respondent suggestions on alternatives that would generate savings. A summary and an evaluation of these suggestions is provided in the report: Overall, these suggestions are either already in place or have been discounted as unviable.

3. **DETAILS OF THE REPORT**

3.1 **Background**

What is day support?

- 3.1.1 Day support in adult social care can be broadly defined as support and activities outside the home and during the daytime. It is for adult who have care and support needs, as defined in the 2014 Care Act. Traditionally, day support has been synonymous with day centres: buildings that are typically open Monday to Friday, with support and activities provided by social care staff. In recent years, day support has expanded to encompass a broader range of activities, such as support staff helping people to get out and about in their local communities. The October 2020 and this report looks at the future of day support in its broadest sense.

Existing day support provision

- 3.1.2 Tower Hamlets has five 'in-house' day support services that operate as day centres. We commission two daytime support services for older people that operate as day centres.

Name	Location	In-house / external	Aimed at
Russia Lane	Bethnal Green	In-house	Adults with dementia
Riverside day centre	Isle of Dogs	In-house	Older people
Sonali Gardens	Shadwell	External	Older people
Sundial Centre	Bethnal Green	External	Older people
Pritchard's Road day centre	Bethnal Green	In-house	Adults with mental health needs
Physical Disability Day Opportunities	Stepney	In-house	Adults with a physical disability
Create	Near Whitechapel	In-house	Adults with a learning disability

There are currently nine day service provisions used by adults with a learning disability in Tower Hamlets. There are a range of other commissioned day support options for adults with mental health issues and for older people. There are also targeted day support options for adults with a physical disability available in the area, including Ability Bow in Tower Hamlets and Headway in Hackney.

- 3.1.3 In addition, we commission a range of broader, holistic day support for adults with support needs. This support is not only available for adults with care and support needs with needs eligible under the 2014 Care Act. Finally, activities and facilities (e.g. run from leisure centres, parks, Idea Stores) available for residents in the borough are equally available for people who need care and support. Adult social care users are able to access direct payments to organise their own care and support³, which can include – for example – employing a Personal Assistant to support people to access these facilities and activities.
- 3.1.4 A full range of day support provision is described in Appendix II.
- 3.1.5 The Covid-19 pandemic means day support is being provided in a different way. All day centres closed in March 2020 with the onset of the pandemic and all centres for older people, people with mental health issues and older people remain closed. Since this time, support has been provided to people in a very different way: ‘Safe and well checks’ are routinely carried out (typically over the phone), home visits are taking place where needed, and services are increasingly using digital technology to provide support and activities to people. In addition, in recognition of the potential increased strain being felt by carers as a result of their family members being home more often, accommodation-based respite is now being offered where possible and where needed, subject to the availability of Covid-19 testing. We are continuing to offer ‘carer relief’ home-based respite, and the Carers Emergency Service to provide urgent support to carers; and since December 2020 we have started providing respite and carer relief free of charge. Overall, the responsiveness, flexibility and commitment of day services through the unprecedented challenges of the pandemic continues to be an amazing achievement. Later in this report, the impact of the pandemic and day centre closure on service users and carers (as described by service users and carers) is set out.
- 3.1.6 It should be noted that changes to day support for adults with a learning disability is not considered in this report. This is because separate work is being carried out in relation to this. The focus of this report is therefore on older people, adults with a physical disability and adults with a mental health issue.

3.2 Rationale for change

- 3.2.1 The rationale for change described in the October 2020 report can be summarised as follows:
- 3.2.2 Firstly, our current approach to day support is not fully in line with our agreed strategic aims, summarised as follows:
- The role of adult social care is to empower people who need support to be as independent as possible (promoting independence)
 - We should be as concerned with people’s strengths and the things they can contribute to society as we are with the things they need support with (strengths-based practice).
 - Our society should be inclusive of people with support needs - social barriers can disable people (social model of disability)
 - When it comes to support, one size does not fit all (personalisation)

³ As of August 2020, 607 adult social care users were receiving a direct payment to organise their own care and support

This is not to say that current day services go against or contradicts these aims, but rather that more work and change is needed in order to fully achieve them.

- 3.2.3 Secondly, we are facing significant financial pressures that have been worsened as a result of the pandemic. We have had to save £200m since 2010 due to government austerity and increasing demand, with a further estimated £44m savings required to be delivered over the next three financial years. In addition, there are significant distinct pressures faced by adult social care, from demographic trends where the older population are living longer with multiple health conditions and an increasing number of younger adults with complex conditions requiring support as they enter adulthood, added to the unknown implications of 'Long Covid' and additional support needs that may arise as a result of the pandemic. Whilst new funding has been made available to councils (including through the Improved Better Care Fund, Social Care Grant, Council Tax Precept and short-term Covid grants), the council still needs to deliver savings and monitor closely the spend on demand-led services to remain within a balanced budget.
- 3.2.4 Thirdly, the Covid-19 pandemic has changed day support – and how we use buildings and public spaces overall – since the pandemic began in March 2020. There is a sense that the pandemic is accelerating changes that were already in train, such as the shift to online purchasing away from high-streets, and the shift towards increasingly flexible working arrangements. Building-based day centres must also be seen in this context of change. Overall, we want day support to reflect what is important to current service users and carers, whilst reflecting the needs and interests of future service users and carers in a 'post-Covid world': This includes having a flexible, inclusive 'base' - equipped with digital and assistive technology - for people to access the range of activities available in Tower Hamlets, whilst providing the ability for people to come together and socialise, the ability to go to a safe and inclusive space with access to support staff when needed, the ability to form a structure or routine if preferred and access to activities that build skills, confidence and improve mental and physical health.
- 3.2.5 Finally, whilst it is clear that services are incredibly valued by the people who attend them, some in-house day centres were underutilised prior to the Covid-19 pandemic⁴ (please see Appendix II). Overall, we think this underutilisation is at least partly due to more traditional day centre models being an increasingly less attractive option for people coming into adult social care for the first time and in particular, those of working age.
- 3.2.6 It is important to note that this rationale for change does not negate the excellent support that has been provided to date by existing day services before and throughout the pandemic, and it is clear in feedback that these services are much valued by service users and carers.
- 3.2.7 It should also be highlighted that some degree of change to day support has already been agreed: In early 2020 and prior to the pandemic, Cabinet agreed to a proposal to merge the Physical Disability (PD) Day Opportunities with Riverside day centre. The PD Day Opportunities building is due to be demolished and the site redeveloped as part of a Housing Regeneration programme on the Clichy Estate.

3.3 The views of day support service users prior to the consultation

- 3.3.1 Prior to the consultation between July and September 2020, we commissioned Toynbee Hall to carry out a coproduction exercise on day services for older people (Riverside, Sonali Gardens, Russia Lane, Sundial Centre) and adults with a physical disability (PD Day Opportunities). Overall, Toynbee Hall heard from 12 day centre staff, 115 service users, 26

⁴ The attendance figures in Appendix I were calculated by taking the actual attendance in relation to the respective capacity of a day centre. Those that were absent at any time due to illness, holidays or other reasons were not included. The data used in relation to Pritchard's Road was provided by the service.

carers and 18 stakeholders, and the exercise provided valuable insight into people's views on day support and what they might want to see in future.

- 3.3.2 A summary of the findings and recommendations for a future model of support are attached to this report as Appendix III. They are also included throughout the section of this report that describes the consultation results. Overall, the findings and recommendations informed the October 2020 Cabinet report as well as informing the final proposals in this report.
- 3.3.3 Prior to the consultation, engagement with Pritchard's Road on mental health service change was last carried out in 2019. This engagement underlined users positive experience of the staff and support at the service and highlighted that some service users have been attending Pritchard's Road for many years. Concerns were raised about charging for adult social care, with perceptions that it is unfair for some service users to be exempt from charging (if they fall under Section 117 of the Mental Health Act, for example) while others are not, and queries about why some day support is not subject to charging (e.g. if it is 'universal') whereas Pritchard's Road is.

3.4 The proposed changes to day support outlined in October 2020

- 3.4.1 In October 2020, we proposed a new model of day support informed by previous coproduction and feedback and aligned to our strategic aims. We proposed the following main changes, which were subsequently consulted on between 9 November 2020 and 4 January 2021:
- To have fewer day centre service buildings overall, including a proposal for Physical Disability Day Opportunities, Riverside day centre and Pritchard's Road day centre to not reopen and formally close on 31 March 2021.
 - To use day service buildings as community support hubs.
 - To help people who need adult social care to use a bigger range of daytime activities.
 - To support people to organise their own support through direct payments.
- 3.4.2 The table on the next page summarises the consultation activity and response rate.

3.5 Consultation on the proposed changes day support

3.5.1 The consultation ran from 9 November 2020 to 4 January 2021. Recognising that some day service users would find it difficult to respond to an online consultation, we carried out a wide range of activity targeted at the people most impacted by the proposals. A summary of the activity and the consultation response rate is described in the table below

	Number of SU impacted as of November 2020	Toynbee Hall Coproduction (prior to consultation)	Online consultation responses*	Number of postal questionnaires completed**	Virtual focus group***	Face-to-face focus group****	Carer Forum meeting, Carer Centre	Local Voices, Real	Feedback via phone, email, letter or video*****
Total number of participants, exc. staff	-	133	26	106	20	17	3	6	13
Participants from Pritchard's Road	50	-	3	22	3	17	-	-	5
Participants from Riverside	19	19	-	5	5	-	-	-	1
Participants from PD Day Opps	17	19	-	6	9	-	-	-	3
Participants from Russia Lane	23	20	1	4	1	-	-	-	-
Participants from Sonali Gardens	82	61	-	24	-	-	-	-	1
Participants from Sundial Centre	34	22	-	30	-	-	-	-	-

*The online consultation was promoted throughout the consultation period. Targeted communication was carried out with adult social care users and providers (for example, targeted at service users who use a direct payment).

**Postal consultation: Printed consultations were posted to service users registered to attend all the day centres listed in this table, 86 of which were from Pritchard's Road, PD Day Opportunities and Riverside day centre. Of those 86, 39 discussed the consultation with a member of staff during a face-to face visit. All remaining service users or carers discussed the consultation with a member of staff during a phone call.

***Virtual focus groups: Two public virtual focus groups were held on 2 December during the day, and 10 December at 5pm. These were promoted to residents via Council communication channels. Two virtual focus groups were held specifically for Riverside and PD Day Opportunities service users and carers on 16 and 17 December. MS Teams was used in line with Council policy.

****Face-to-face focus group: Four socially distanced face-to-face focus groups were held with Pritchard's Road service users and carers on 15 and 16 December.

*****Feedback via phone, email, letter or video: A dedicated phone number was set up for people to call with feedback. Six calls were received. People could also email feedback, and four emails were received. Two letters and one video was received.

The profile of respondents

- 3.5.2 Of the 95 consultation respondents who provided information on themselves, 40 were people using day services. 39 were unpaid carers responding on behalf of a person using day services. Three were advisors helping a person using day services to respond, and 18 respondents who were not directly impacted by these changes.
- 3.5.3 The table below⁵ sets out the demographics of consultation respondents. It should be noted that this information is not comprehensive, as not every respondent opted to provide this information. It would not be meaningful to directly compare this information with the demographics of day service users as the respondents included carers and other stakeholders, however it can be seen that a broad range of views has been collated through this exercise.

Age		Disability		Gender		Gender reassignment		Sex		Caring responsibilities	
Under 65	Over 65	Yes	No	Male	Female	Same as birth	Different to birth	Man	Woman	Yes	No
53	51	82	28	45	70	112	1	44	66	17	85

Sexual orientation			Married or civil partnership		Marital status					Pregnant or given birth in last 12 months	
Straight	Gay/lesbian	Bi / other	Yes	No	Married	Single	Divorced	Widowed	Other	Yes	No
97	1	2	44	44	37	25	9	12	2	2	98

Ethnic group								Religion or belief			
White British	White Other	Asian Bangladeshi	Asian Other	Black Somali	Black Other	Mixed White / Black	Other	Christian	Muslim	No religion	Other
37	13	38	2	0	14	2	0	55	40	7	2

⁵ Some optional answers that received zero response (e.g. Buddhist) have been excluded from the table above but were included in the equalities monitoring form.

3.6 Consultation results

Consultation results on proposal to have fewer day centres

- 3.6.1 Overall, the vast majority of respondents did not support the proposal to formally close Physical Disability Day Opportunities, Riverside and Pritchard's Road day centres.
- 3.6.2 What came out strongly in the consultation is the range of things that service users and carers value about existing day centres and services. Day services enable people to come together, socialise and make friends. This was the most common theme in feedback throughout the consultation.
- "I enjoy going to the day centre as it has helped me socially, emotionally as I live on my own. Going there seeing familiar faces and carrying out activities has lightened up my lifestyle"*
- "This [day service] is my only outlet and change to socialise with people"*
- "Meeting up with friends and talking helps to get over some of the doubts that I get"*
- "I love meeting people [at the centre] and talking otherwise I would not leave the house at all"*
- 3.6.3 People value the staff who work in day services. In meetings, some service users spoke about valuing staff that they trust.
- "Staff at centre are fantastic and very caring"*
- "The staff can cope with my illness"*
- "If I have a problem I can go to them [staff] and they will listen to me and they will give advice".*
- "The staff are supportive and challenge us to help ourselves and meet our goals. The staff give us motivation".*
- 3.6.4 A number of Pritchard's Road service users described the service as a 'family' and a 'community'.
- "One of the unique things about services such as PRDC is the genuine feeling of community where service users can fully express themselves as an individual and not just as a statistic"*
- "We are a family. We get on well together"*
- 3.6.5 People value day centres as a 'safe space'.
- "I feel safe and secure when I go"*
- "It is a place where the service users can feel safe and secure amongst other vulnerable people"*
- 3.6.6 A number of respondents mentioned the benefits of day services providing respite for carers and families:
- "[Day services] provides support for the families as it gives them a chance to do other things such as household chores etc without worrying about their family members"*
- "Whilst he is at the centre I know he is safe. It means I have a few hours where I can put myself first or just sort out things at home"*
- "At the moment it works really well with myself being at work during the day and my mother is at the day service at the same time"*
- 3.6.7 Other responses described the positive impact of current day services on people's confidence, their skills and their mental health and their physical health and wellbeing. A number of people described how their lives had changed for the better as a result of attending day centres.

“Going to my day centre has improved my health and wellbeing e.g. my confidence and social skills”

“Service users need those centres to kept open because it help them in managing mentally, physically”

- 3.6.8 Some respondents highlighted the benefits of day services bringing structure and routine to people’s lives.

“Without this [day] service my husband struggles to keep his daily routine, which gives him stress”

“They see us go to work and schools. They too need a routine and something to keep them busy”.

- 3.6.9 PD Day Opportunities was highlighted as being valued as only service in the borough dedicated to supporting adults with a physical disability.

“...the Day Opps service is the only service that caters for people with physical disabilities. There is no other service of its kind”

- 3.6.10 The location of Pritchard’s Road was also valued by some respondents:

“It is in a good location as it is close to where I live”

- 3.6.11 Concerns, anger and anxiety about changes to existing services came through in some of the consultation responses. For PD Day Opportunities, Riverside and Pritchard’s Road, many service users and carers raised concerns about the proposals and future change:

“I feel that things should remain the same and that the council must have other ways in which it can save money”

“I am worried about it I like going to PRDC”

“It will be sad for me if PRDC closes. This is because it is the only place I know”.

“It is ridiculous, I come to a centre and have built up trust and makes me feel it is a good centre”.

“I find it hard to be with people I don’t know...and get very anxious to go to places I don’t know”.

- 3.6.12 A number of responses expressed concerns about the potential impact of closing day centres on people’s mental and physical health, and some felt that this would ultimately negate the saving being proposed.

“It is also arguable that any suggested savings are short-sighted as if the current users of Day Opps are deprived of their much needed service, this may cost the council as well as the NHS much more money as these users could develop other issues which then require support and medical intervention”

- 3.6.13 In surveys and in meetings, a number of Pritchard’s Road respondents described how they had been going to the service for a very long time, with very strong ties to the building, to the staff and each other that would make change extremely difficult.

“Pritchard’s Road is a beautiful space. Many people have been here over the years, we have our core members.”

“I need the security of knowing that the network of friends I’ve made and the dedicated staff are there for me”

- 3.6.14 Responses from other day centres and services were similar, with a particular concern from a number of Sonali Gardens service users and carers that the centre there might close, reduce or change in a way that would be detrimental to service users:

“We want no changes we think the centre should remain the same as it is before”

“New changes can mean reduced and change of the service she receives which is extremely worrying”

“I dislike the idea of a hub as this will attract strangers and will raise my anxiety level”

“It would be very disheartening if services are closed or limited because that is neglecting the older generation. Don't be surprised if depression, mental health, dementia, people's anxieties, wellbeing, suicide rate will increase and be in the rise. That would be inevitable if services are limited”.

3.6.15 Some of the responses from day service users, carers and other respondents thought the change could be positive or were in favour of change happening:

“It could be a positive thing depending on how it affects each individual needs”

“I understand that the council has to make savings to their budget and if day centres are under-utilised so it makes sense to amalgamate the centre. As long as it doesn't affect the care for the service user”

“Community hubs that offer a wide range of activities could be a good stepping-stone for service users with early signs of adult care needs”

“I have felt for a while that PRDC does not really provide value for money and that it is outdated and - despite the hard work and best efforts of the staff - is not really going to be able to adapt to the future. Day centres are a thing of the past - certainly for mental health - yes important to have somewhere to go and mix but not there”

3.6.16 Feedback suggests that service users and carers are likely to continue to need significant support to go through the changes proposed in this report.

3.6.17 The consultation asked respondents from Pritchard’s Road, Riverside and PD Day Opportunities to indicate if they would be interested in alternative provision by answering yes, no or don’t know. The table below sets out the results of this:

Would you be interested in...	Yes	No	Don't know
...attending another local day service during the week, such as Sonali Gardens or Sundial Centre?	12	23	17
..one of these – Sonali Gardens – being a community support hub?	11	23	15
...attending another day service over the weekend if one was open?	19	23	10
...attending another day support service, such as the recovery college or Linkage Plus Centre?	12	23	15
...receiving a direct payment to pay for your support and care and help you to get out and about?	19	19	11
...organising day support activities with other people who need social care? (e.g. an activity in an Idea Store)	10	31	9
...day support from an approved carer in the community, in their home?	12	26	12
..using another drop-in service if you use one at Pritchard’s Road currently? These are Mind Community Connecting Service, Recovery College and Working Well Trust	13	21	11

Consultation responses on having community support hubs

3.6.18 The consultation asked people what they wanted to see from a hub day support service, and the above is echoed in further feedback that also describes access to information, advice and a care.

“Easily accessible, safe environment”

“I would like to feel safe there. I would like it to be near to where I live. I would like activities such as cooking, computing”.

“I really need somewhere like PRDC where I can sit down, have a cup of tea and staff can support me with benefits, letters and filling out forms”

“All the services that they already have but include coffee shops, restaurants, shops. One stop shop on site to provide advisory service. Also internet access”

“A drop-in. If people aren't feeling well - as safe space to sit, be quiet, be supported in. That is just as vital to activities”.

“Community hubs that offer a wide range of activities could be a good stepping stone for a SU with early signs of adult care needs”.

3.6.19 In the postal consultation, most people answered the question on what to see in a hub day support service by describing the activities they wanted to take part in. The table below sets out the activities' respondents listed:

Activity	Number of respondents
Physical exercise	17
Socialising	11
Arts and crafts	10
Games	6
Trips	4
Advice and education on being healthy	4
Reading / Book Club	4
IT / tablet to contact family / internet access	4
Activities to develop practical skills (e.g. metalwork)	3
Media consumption	3
Cooking	3
Talks from external speakers / visits	3
Gardening	3
Religious activities	2
Live bands / singers / music	2
Sewing and knitting	1
Relaxation	1
Maths	1
Parties	1
Activities that embrace different cultures	1

3.6.20 In meetings, a number of Pritchard's Road service users also mentioned gardening, cooking and pottery as the activities they enjoyed. In a meeting with Local Voices, it was mentioned that some people may need support to start using more virtual and digital activities and opportunities.

3.6.21 The consultation asked people at what times and on what days they wanted day support to be available. A number of respondents specified particular days of the week, sometimes confirming that these were the days they would normally go to a day centre. Overall, feedback can be summarised as follows:

Time	Number of respondents
Weekdays	87
Weekends	30
Evenings	6

3.6.22 In addition and as noted previously, 19 respondents from Riverside, PD Day Opportunities and Pritchard's Road said they would be interested in attending another day service at the weekend if one was open.

“Weekdays at least but there should be something to help everyday. People like me that have mental health problems can have problems 24-7 and could need help.”

- 3.6.23 This echoes the Toynbee Hall coproduction report where the options for weekend opening and afternoon or evening sessions were raised as something for which there might be interest in.
- 3.6.24 The consultation included the following question: ‘At the moment, there are day services in buildings for older people, for people with dementia, for people with a physical disability, for people with a learning disability and people with mental health issues. Do you think day support should continue to be based on these categories?’. The majority of respondents replied ‘yes’ to this question without providing further comment. A few respondents raised concerns at the idea of having a hub that was open to multiple service user groups, whilst a few others were positive about the idea.
- “[If there was a service covering more than one client group] that would be too much, the staff will not be able to work with all these different people and the people need staff who can support their condition”*
- “These categories allow people to meet others with the same issues and feel like they are not alone. Merging the categories will create tensions within day care centres amongst service users”*
- “Day Opps has mixed age people, all backgrounds and that is why I like it”*
- “Mix some categories together and have more professional support”*
- 3.6.25 At a meeting, one service user from Pritchard’s Road suggested that the building become the community support hub, and this is echoed in a few of the postal consultation responses. The Toynbee Hall Coproduction report found the following:
- An overall perception was that people over 60 are happy to mix with each other, and younger users may choose to withdraw from building-based services if the majority of users are over 60.
 - There was a strong interest from all users to mix with people from different ethnicities.

Consultation responses on helping people to use a bigger range of daytime activities

- 3.6.26 One question in the consultation was: “how can we address the barriers that make it harder for people to get out and about in their communities?”. In the responses, transport was identified most often as a barrier that makes it harder for people to get out and about in their communities, with 43 respondents mentioning this.
- “Transport door to door...I get some fear when travelling on my own”*
- “Provide support to people who have problems using public transport”*
- 3.6.27 The need for support and encouragement to get out and about was mentioned by a number of respondents (16 postal responses), as was the need for community. Previous feedback also indicates that some people may have concerns about going to new places or meeting people they do not know for the first time, which may be linked to this.
- “Phoning people to encourage people to go out”*
- “There is no meeting point. Nothing happens locally. People are just stuck at home lonely. Neighbours do not even talk or care about each other. We need services to bring community together”*
- “Help and advice and confidence, meeting with people to explain options, e.g. what support is available”*
- “Some people cannot travel outside their comfort zone”*
- “Pritchard’s Road is not just comfortable, it is familiar. You see people in Bethnal Green regularly, but you don’t know them. Making friends is so hard.”*
- “Sometimes it takes a lot of pushing to go outside when I am not well. I don’t want to go. It takes a lot of getting to know people”.*
- “I need encouragement to get out and do activities”*

“Like many disabled people [the person I care for] is wary of new environments and strangers”

3.6.28 In meetings, some people raised fears around mental health stigma and community venues not always being ‘safe spaces’:

“Coming to the centre gives me the chance to express myself in all my multiple personalities...It is really difficult going to the supermarket sometimes, with my dissociative personality disorder”

“You can address these barriers by educating the wider community they live in... make being out there safer”

3.6.29 Barriers as a result of physical accessibility issues was also explained by a number of respondents:

“I am interested in finding out about other services but they would have to be near to where I am living due to finding it difficult to go out walking”

“Provide more dipped kerbs...very restrictive accessibility for wheelchair users”

“Ensure all public buildings are accessible by disabled people”

3.6.30 Not having enough information on the activities available was also raised as a barrier by a number of respondents:

“Promote Council Services through GP's, social workers and healthcare workers. At present, information is haphazard”

3.6.31 A few respondents also described language and/or cultural barriers (see below). This echoes the Toynbee Hall Coproduction report whereby a number of participants expressed concerns about language barriers.

“[Need] more advertisement of services in different languages. Promote these services”

“[My mother] cannot attend multiple venues nor can she deal with language or cultural barriers”

3.6.32 In group meetings, day service users also raised concerns about differing levels of support being available at community venues – e.g. one person commenting that Idea Store staff do not provide the same level of help as day service staff, another person commenting that they need to trust support staff and would not trust staff in community venues.

Consultation response on supporting more people via direct payments

3.6.33 In the postal consultation, direct payments was the alternative option chosen most frequently by Riverside, PD Day Opportunities and Pritchard’s Road service users (along with a day service being open over a weekend) although no additional comments were left in relation to this. One theme in some of the consultation meetings was that adult social care users and carers were not always aware of direct payments and did not know how they ‘work’. However, carers attending the Carer Forum raised concerns that direct payments may add an additional burden on carers to manage. It should be noted that the consultation was promoted to direct payments via People Plus in order to gather their views, but a limited response was received: We think this is mainly because a high number of people who receive direct payments employ Personal Assistants and/or access alternative day support or activities and therefore may not see the proposals as having a significant impact on them.

The impact of the Covid-19 pandemic

3.6.34 At the time of writing (January 2021) both in-house and commissioned day centres in Tower Hamlets for older people, people with physical disabilities and people with mental

health issues have been closed since March 2020. The consultation gives an indication of the impact of this on day support service users and carers.

- 3.6.35 Some responses were in agreement with the centres being closed and one response indicated an intention not to return.
- “I think it will be a risk due to Covid if a lot of people were using the centre at the same time. It could help with the spread of the infection, help to stop people catching the virus”*
- “Mum won’t be returning”*
- 3.6.36 A number of consultation responses were that people really appreciated the support provided by day service staff whilst the centres were closed
- “[The day centre] team are doing a good of managing the difficulties while supporting my mother and staying in line with government guidelines”*
- “I am not happy that the centre is temporarily closed but I am very happy with the carers that come to visit”*
- 3.6.37 However, feedback from staff is that some families and carers are struggling with the reduction in respite, and some of the consultation responses described the negative impact of centres being closed (see below). This echoes the findings in the Toynbee Hall Coproduction report.
- “Not being able to attend [the day centre] during Covid has been very hard. I miss being around people and of my age. I feel demotivated and my health has deteriorated”*
- “It’s affecting my health not going to the centre I’m so depressed I hate it I’m bored. I need to go back to the centre. I’m fed up, it’s playing up on my nerves.”*
- 3.6.38 Some service users at Pritchard’s Road described how they have kept in regular contact with one another since the centre closed in March, which had helped to ease the situation.
- “We ring each other and that helps us cope. I have known some people since they started, and we support each other”*

3.6.39 Alternative ways to make the saving

One of the questions in the consultation was as follows: “The council must make financial savings to continue to provide a sustainable social care offer. Do you have any suggested improvements to these options or any proposed alternatives?”. The responses to this question can be summarised and quantified as follows:

Area of saving	Number of respondents
Stop spending money elsewhere. Topics mentioned were on leaflets, Liveable Streets, road resurfacing, parks, interpreters and fireworks.	11
Fundraise to gather income to pay for existing day centres to stay open	8
Recruit volunteers to help run day services	5
Reduce Mayor and Councillor salaries / allowances / costs	5
Increase Council Tax	4
Reduce the size of Council management teams	3
Reduce ‘red tape’	3
Charge people more for day care	3
Income from corporate sponsorship / investment / charities	3
Income from selling council buildings / land / use PRDC annexe	3
Reduce council staff salaries	2
Tackle theft and fraud	2
More automation / digitisation	1
Get better value for money in contracts	1
Reduce the level of commissioning / ‘outsourcing’	1
Reduce existing day centre opening times so costs reduced	1
Integrate older people’s and early years settings	1
Share back office functions with other local authorities	1
Stop council staff attending conferences	1

- 3.6.40 These cannot be considered as full alternatives to the proposal because they are either:
- Already in progress. This includes plans for more digitisation, plans to reduce the size of senior management teams and plans to get better value for money in contracts.
 - Unviable or highly unlikely to achieve the same level of saving. For example, whilst we have and will support fundraising and use volunteer support in relation to day support, this is highly unlikely to cover the full annual costs. That being said, we will put a bigger emphasis on fundraising as we agree that there is scope to improve our work in this area.

3.7 **Proposals to change day support in adult social care**

- 3.7.1 The following set of proposals are based on:
- The rationale for change described in section 3.2.
 - The findings of the Toynbee Hall coproduction exercise described in the report and in appendix III.
 - The consultation results described in section 3.6.
 - The results of the Equality Analysis attached as Appendix IV.
 - An evaluation of the options available, described as part of this section of the report.

Recommendation 1: To close Physical Disability Day Opportunities, Riverside day centre and Pritchard’s Road day centre with effect from 4 May 2021

- 3.7.2 In line with the original proposal, it is recommended that PD Day Opportunities, Riverside and Pritchard’s Road day centres remain closed after lockdown restrictions end, formally

closing on 4 May 2021. This is in place of the already-agreed proposal to merge PD Day Opportunities with Riverside. Whilst it is clear that these services are valued, there is a strong rationale for change described in section 3.2 and we believe that excellent alternative provision is available and/or is being developed.

- 3.7.3 The alternative day support for service users and carers who attend these centres – and for new service users going forward - are:
- Using the new community support hub. Please see section Recommendation 3 for more detail on this.
 - Using a direct payment to access facilities and activities in the community. Please see Recommendation 4 for more detail on this.
 - Attending alternative mental health community provision for Pritchard's Road service users. A list of this provision is included in Appendix II⁶. As previously noted, seven consultation respondents said they used Pritchard's Road as a drop-in service and would be interested in using another one such as Mind Community Connecting Service, Working Well Trust or Recovery College and 11 said they did not know.
 - Attending an alternative day service. It has been provisionally identified that 10 service users from Riverside day centre and PD Day Opportunities have needs that will likely limit their ability to go out and about in the community that may best be met by an alternative day centre service which - depending on each individual's needs and wishes - could include Sonali Gardens or Headway⁷. Four service users have a dementia diagnosis and could start to attend Russia Lane. As previously noted, 12 consultation respondents said they would be interested in attending another local day service such as Sonali Gardens, and 17 said they did not know.
 - Service users from PD Day Opportunities, Riverside and Pritchard's Road can transition from existing to new support options earlier than May 2021 depending on their needs and wishes.

Transitional support

- 3.7.4 The consultation responses highlight that a number of service users will likely need support through this change, to agree on an alternative that is right for them and to access or design this. This may be particularly true for service users who have attended Pritchard's Road, Riverside and PD Day Opportunities for a number of years and who have strong ties to the staff and centres. Furthermore, some of the feedback is that some people will likely find it hard to go somewhere new or start using a new model of support and will likely need encouragement and support to do this.
- For Riverside and PD Day Opportunities service users, we think that support through this transitional period can be provided by existing staff: Firstly, through practitioners carrying out social care reviews and support planning with service users, and secondly through staff at the places service users transition to: The staff at community support hubs proposed under Recommendation 3 targeted at older people and adults with a physical disability, or staff at Russia Lane or Headway. There are also options for

⁶ Information indicates that there are vacancies for Pritchard's Road service users to attend.

⁷ At the time of writing (February 2021) Sonali Gardens currently has vacancies for 16 service users and has fully accessible facilities. Sonali Gardens is currently targeted at the Bangladeshi community. The service is happy to consider any changes needed to make the service inclusive for service users of other ethnic backgrounds. Headway is a day service in Hackney for adults with brain injury. Places are allocated according to level of need. If there is a waiting list for Headway, alternative support will be provided in the interim. Costings for 3 places at Headway have been calculated as a provisional figure. There are currently 4 service users with a dementia diagnosis and there are currently vacancies at Russia Lane.

service users to get support with the transition from Reablement staff or staff from the 'Taking Control of Your Life'⁸ service offered by Real⁹.

- For Pritchard's Road, we are proposing to recruit a fixed-term Support Worker to work with service users until March 2022 to support them through the change and to access or design alternatives. For example, a Support Worker could support a group of friends from Pritchard's Road to start meeting up at a local venue once a week, facilitating these meetings at first until people have the confidence to continue this themselves; and/or to set up and pool direct payments to organise shared activities. We estimate that this would cost £33,333 per year (10-month fixed term) and expect this post to be based in a commissioned mental health provider organisation.

Recommendation 2: To maintain Russia Lane as a 'dementia hub' day service

- 3.7.5 We propose that Russia Lane Day Service develop as a 'dementia hub', providing specialist support to those with dementia and providing considerable respite for carers who wish to continue to support the service user to remain at home and reduce admissions to long term care.
- 3.7.6 As a hub, the service will continue to support service users to access a range of tailored events in the community. We recognise that the needs of some service users are such that their ability to go out and about in the community will be limited. For that reason, we will continue to 'bring the community in' to specialist day services where needed. For example, prior to the pandemic, nursery and primary school aged children regularly visited some older people's day services to read together.
- 3.7.7 We will work to extend the opening of Russia Lane to weekends to have a more flexible service that meets the needs and interests of service users and carers: An interest in day support providing weekend opening came out in consultation feedback.

Recommendation 3: Open community a support hub from May 2021 onwards

The model

- 3.7.8 In line with the original proposal, it is recommended that we open a community support hub, utilising day service buildings to do this and designing a service model for both current and future service users. Appendix I sets out a description of the model in more detail, building on the Toynbee Hall coproduction work and the feedback provided in consultation responses.
- 3.7.9 It is recommended that the community support hub be based at Sonali Gardens from May 2021 onwards. This is because:
- It is over 500m² in size
 - It has fully accessible facilities, with hoist, changing table and bathing facilities
 - It has a garden and kitchen.
 - It is close to public transport links (located close to Shadwell DLR and bus routes) and centrally located in the borough.
 - Sonali Gardens has its own transport for service users who cannot travel independently

⁸ This project delivers creative support planning support alongside a user-led co-production group harnessing the views of people with lived experience of disability.

⁹ Real DPO Ltd are funded through the Local Community Fund until March 2023 to provide the "Taking control of your life" project, delivering 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'.

- Sonali Gardens already offers weekend opening times and we want the hub to be open at weekends in line with feedback that this might be of interest to people.
- The cost of the lease at Sonali Gardens is competitive in comparison to other Council owned buildings.
- The site of the community support hub will be on the same site as the service aimed at service users with higher needs who may be less able to get out and about.
- Linkage Plus already operates from this site.

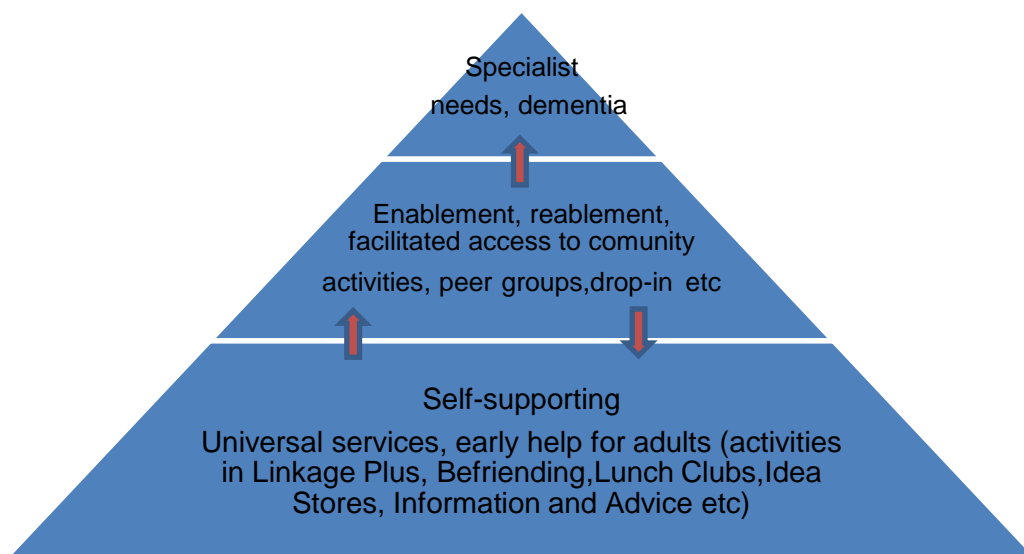
3.7.10 We are proposing that a range of activities over a range of ‘spoke’ sites are provided for hub service users. These are described in more detail in Appendix I. In addition, the community support hub will complement and have links to the other forms of day support that exist – including Linkage Plus Centres for older people and the Recovery College in mental health services – and we anticipate that some service users will want to access these other forms of day support where it meets their needs and interests. Please see Appendix II for more detail on these and Appendix I for more detail on how the hub will connect with other activities and support services.

3.7.11 There will be a staff presence in the hub, and the role of staff in the hub is described in Appendix I. In addition, advocacy support will be available to service users to resolve issues (e.g. difficulties in resolving a housing issue). Depending on needs and preferences, this advocacy can be offered directly by hub staff to through our commissioned advocacy services.

3.7.12 A proportion of the £0.452m reinvestment figure will be used to transform Sonali Gardens into a community support hub and run the spoke activities, as detailed in section 3.11.3.

3.7.13 We propose that the community support hub be targeted at older people and adults with a physical disability, but also open to adults with mental health issues and those with a learning disability. It will be available for service users who currently attend Riverside and PD Day Opportunities, pending a review meeting to discuss individual needs and wishes. Some of the activities organised through the hub may also suit the needs and wishes of current Pritchard’s Road service users and these will be available to them. It will be available for new people who are eligible for social care following a Care Act social care assessment, using our existing referral routes into social care (e.g. via GPs, self-referrals).

3.7.14 The diagram below summarises where the community support hub ‘fits’ with the overall picture of day support in Tower Hamlets



- 3.7.18 The above diagram can be explained as follows:
- The top of the triangle refers to those with high and complex needs and who may need a building-based service for dementia or other high / complex care need.
 - The medium part of the triangle refers to the new community support hub model offering access to a building based community hub and activities to those with higher eligible support needs but also accommodating those with eligible support needs who are able to access a range of activities - self-organised or supported/facilitated - in the community. Activities at the hub will also allow for drop in.
 - The bottom part of the triangle refers to the larger part of (mainly but not exclusively older) residents that can access universal provision and early help in the community where they will receive that extra bit of support they need to live independently.
 - Should service users in the bottom or middle section of the triangle develop higher needs including dementia they would be assessed for eligible needs to access either the dementia specialist services or the day opportunities community hub(s) for the additional support they need.
 - At the same time, those from the middle section of the triangle are also supported and encouraged to access the range of universal and community services
- 3.7.19 Please see Appendix VI for a Think Local, Act Personal model of community-centred support, describing how this vision for day support fits into the wider context of community-based adult social care.

Timescales

- 3.7.15 To start to transform services into community support hubs, we will initially run three projects from the community support hub starting from May 2021 at the latest¹⁰. These are based on the consultation results and Toynbee Hall coproduction work. These projects will be:
1. Community access: Facilitating visits to local Idea Stores, leisure centres and Linkage Plus centres to take part in activities. In addition, information will be provided on a broader range of local activities via a weekly calendar for people to access in line with their needs and interests.
 2. Peer-led groups: Facilitating peer-led service user groups, based on the topics identified by service users. For example, this could involve people sharing their own skills with one another. The aim would be for the groups to become more self-sufficient over time.
 3. Digital inclusion: Supporting service users to use the internet in order to access information, build and/or maintain social networks and access services (e.g. online shopping). We will seek to meet the cost of tablets and/or touch screens through capital funding and/or the Disabled Facilities Grant and we will also look at corporate donations in relation to this.

The findings of these projects will be reviewed and go on to inform the running of the hubs on a longer-term basis as the development will need to be iterative, flexible and co-produced with service users and carers. The aim is for the hubs to run or facilitate a broader range of activities at a broader range of locations and will continue to 'bring the community in' for those who cannot access this. Finally, we would like to see a social enterprise on-site (e.g. a café) that can be accessed by the local community.

- 3.7.20 It should be noted that a procurement exercise that will impact day services provided at Sonali Gardens and Sundial Centre will start in 2021 with a new contract start date of April 2022. We will look at options for sites, delivery and procurement as part of this. The procurement exercise will run alongside the procurement for Linkage Plus, enabling us to design and commission these services as a cohesive picture of day support.

¹⁰ This date is based on the assumption that it will be safe by May 2021 to open building-based services in light of the Covid-19 pandemic. If this is not the case, timescales may need to be revised.

Recommendation 5: To encourage more people to organise their own support through a direct payment

- 3.7.21 In line with the original proposal, we want to promote direct payments as an option that gives people more choice and control over their care and support. In the context of day support, this could mean a number of things depending on the needs of the individual but could include the cost of daytime activities (e.g. an exercise class) or the cost of a Personal Assistant to enable someone to get out and about – potentially using the community support hub as a base.
- 3.7.22 The consultation suggests some people might be interested in direct payments: Along with a day service being open over a weekend, direct payments was the alternative option chosen most frequently by Riverside, PD Day Opportunities and Pritchard’s Road service users in the consultation. The focus groups in particular suggest that a number of service users do not know enough about them to make a choice. As of November 2020, 22% of all adult social care users received support via a direct payment (605 people) so we think there is scope for more day support service users to take this option also. Feedback is that direct payments are being seen as a preferred option for a growing number of new adult social care users with mental health issues or physical disabilities.
- 3.7.23 The option also exists for a group of service users to pool their direct payments together to fund services as a group. This option has always existed and would provide the social contact and continuity of friendship groups that came out as an important theme in the consultation. The option has historically had low take-up but had some interest in the consultation results and there are innovative examples where it has worked well in the borough¹¹ and elsewhere. Work is underway to develop a Tower Hamlets Together Personalisation Plan with health partners, including a more robust framework to support people to pool their direct payments. Pooled direct payments could give the option, for example, for a group of Pritchard’s Road service users to employ a support worker and meet on a regular basis, potentially using space at the Pritchard’s Road building on a weekday, weekend or evening if available. It is something that could be discussed further with Pritchard’s Road, Riverside and PD Day Opportunities service users and carers.
- 3.7.24 Service users can receive support with direct payments through [People Plus](#). This includes information, advice and support with setting up a direct payment, recruiting employees and managing a direct payment once in place.

Recommendation 4: To make Tower Hamlets a more inclusive place for people with care and support needs

- 3.7.25 In line with the original proposal and with the results of the Toynbee Hall coproduction work, we want to support people who need adult social care to use a bigger range of daytime activities that exist across the borough and beyond. To do this and to make the community support hub work as a base for people to get out and about, it is clear from the consultation that we need to do more to make Tower Hamlets a more inclusive place for people with care and support needs. We want a bigger focus on tackling and reducing the barriers in society that can exclude people with a disability, such as doing more to ensure the physical accessibility of the borough.
- 3.7.26 It is clear from the consultation results that inaccessible transport is a key barrier to people getting out and about easily. We propose the following in order to address this, which reflects the Tower Hamlets Travel Assistance policy:

¹¹ Please see [this webpage](#) for pooled Personal Health Budget arrangement examples in Tower Hamlets.

- As per policy, 'wherever it is possible and safe to do so, adult social care users will travel independently. Independent Travel Training is a core part of support provision and will be routinely offered to support adult social care users to develop their skills and confidence in this area¹². We will form stronger links between day services and the Independent Travel Training scheme. Freedom Passes and ongoing support from staff can also help people continue to use public transport.
- We will look at developing a walking scheme whereby staff/volunteers accompany service users who live in the vicinity of a day opportunities location and are able to walk from their home to the respective premise and back again at the end of the day.
- However, it is recognised that walking or public transport will not be options for all. Other options for service users with higher needs therefore include the following:
 - Service users using the Taxi Card scheme for some trips
 - Service users organising taxi transport via a direct payment (also sometimes called 'Personal Travel Budgets') and/or have a taxi organised by the council's Transport Services Unit (TSU) if required. In line with Recommendation 3, we will do more to promote direct payments.
- Sonali Gardens can continue to provide their own transport (minibus) for service users who cannot use any alternative.

3.7.27 The proposed closure of the three day centres will impact on the council's Transport Services Unit. We intend to carry out modelling work to look at the potential scenarios and impacts resulting from the changes proposed in this report.

3.7.28 A lack of accessible toilets and changing facilities has been identified as a barrier to people accessing activities outside day centres. Based on initial (but not exhaustive) analysis, fully accessible toilets, hoist and changing facilities have been identified in the borough at Sonali Gardens, Mile End Leisure Centre, Poplar Leisure Centre, Royal London Hospital and Jack Dash House. We propose to use apply for an estimated £25,000-£75,000 of capital funding to convert toilet facilities in the Sundial Centre and/or Pritchard's Road so that they are fully accessible with ceiling hoists and changing tables (if possible) if these sites become spokes for activities. In addition, it should be noted that the new Town Hall due to open in Whitechapel in 2022 will have this facility. These improvements will ensure these facilities fulfil the recommendation to make Tower Hamlets a more inclusive place for people with care and support needs, as neither the Sundial Centre or Pritchard's Road currently offers the infrastructure needed if these spokes become sites for activities. The final funding requirement will be confirmed after further investigation of the spaces available at each site, and confirmation of the extent of any structural alterations required to accommodate a fully accessible toilet and changing facility. The estimated funding range covers the most extensive scope that may be required to deliver full accessibility. Should these proposals be approved by Cabinet, a Project Initiation Document for Small Works will be completed, and approval sought via the existing capital governance structure. Works would then be procured and executed within the financial year 2021-22 for the first project. A timescale would be confirmed for the second site subject to when identified, and the scale of adaptations required.

3.7.29 The consultation responses indicated some interest in the Shared Lives service, whereby service users are support from an approved carer in the community in their home. The model includes facilitating community access, in-keeping with what service users and carers have said is important to them. This model is currently being progressed for adults with a learning disability. We propose that this be expanded further and to other service user groups, starting with adults with mental health issues.

¹² Section 5.5, Tower Hamlets Travel Assistance policy

3.7.30 The need for encouragement and support to access new things also came out in the consultation results. It is for this reason that we are proposing to have a Community Support Worker for Pritchard's Road service users to fulfil this purpose. Part of the role of staff in the community support hubs will also be to support and encourage people in this way. In parallel with this, we recognise that whilst progress has been made in relation to mental health stigma and disability discrimination, there is still much more to do: We will seek to strengthen the work we already do to tackle this, for example through awareness-raising campaigns.

3.8 Discounted options

3.8.1 We are not proposing to use the day support reinvestment amount to expand Russia Lane opening times to the weekend. This is because feedback via staff and via the consultation does not indicate a significant demand for this. However, we will keep this under review as we recognise that this demand may change in future.

3.8.2 We are not proposing to reduce Russia Lane opening times from Monday to Thursday and to offer Friday to Sunday as alternative day support for Riverside, PD Day Opportunities and Pritchard's Road service users. Feedback is that this is not a preferred option as the service environment is very much aimed at supporting users with dementia in terms of layout, colour scheme, decoration and service design; and reducing the dementia service to four days would have a negative impact on those who currently use it for five days.

3.8.3 We are not proposing that Jack Dash House, Pritchard's Road, an Idea Store or a community hub (e.g. Tramshed) become the community support hub. This is because:

- The above venues do not provide the same value for money as Sonali Gardens in terms of the cost for voluntary sector providers to use the space.
- With the exception of Jack Dash House, the venues do not have fully accessible toilet facilities including hoist and changing table and some do not have kitchens that could be used and would therefore require investment to resolve this.
- However, potentially these venues or other local, accessible venues could all be used as sites for activities as part of our broader day support offer. This will be looked at as part of the development of the community support hubs and is described more in Appendix I.

3.8.4 We are not proposing full integration of mental health day services and day service for older people and those with a physical disability, in line with some of the consultation responses. However, neither are we proposing total segregation, as people with mental health issues can still access information, advice and information on activities from the community support hubs (and can still use the building itself as a base and take part in 'spoke' activities in line with needs and preferences).

3.8.5 As previously noted, consultation respondents made a number of suggested alternatives to make the required saving. A number of these suggestions already form part of the Council's Medium-Term Financial Plan and are already in progress. Others have been considered but are unviable or highly unlikely to achieve the same level of saving.

3.9 Future timescales

Action	Date
Social care reviews of service users and carers from Pritchard's Road, PD Day Opportunities and Riverside day centres	4 March – 16 April
Corporate Trade Union Forum to discuss staff proposal	1 April 2021
30-day staff consultation starts	2 April – 3 May 2021
Staff consultation ends	3 May 2021
Staff 12-week redeployment period starts	4 May 2021
Closure of Physical Disability Day Opportunities, Riverside day centre and Pritchard's Road day centre	4 May 2021
Community Support Hub opens	4 May 2021
Staff 12-week redeployment period ends	27 July 2021

3.10 Impact of the changes

Staff

- 3.10.1 As described in the October 2020 report, 24 FTE staff work in the three in-house day centres we are proposing to close. Six posts are currently vacant. Staff and the trade unions have been informally briefed about the scope of these proposals. They have been advised that the detailed proposals setting out the rationale and impact on staff will be subject to formal staff consultation in line with the council's Organisational Change Policy. The council will take all reasonable measures to avoid compulsory redundancies wherever possible. We will look at all funded vacancies across Adult Social Care and the wider directorate generally as potential options for redeployment for staff impacted by these proposals and ensure these are ringfenced to those identified as being at risk of compulsory redundancy
- 3.10.2 We are proposing to commission or employ:
- A Community Support Worker on a fixed-term contract between May 2021 and March 2022 (10 months).
 - A Shared Lives Coordinator
 - Additional staff to run the community support hubs (number and roles to be confirmed).
- 3.10.3 We will look at the content of existing job descriptions and the proposed new roles to determine job matching and TUPE rights.

Service users and carers

- 3.10.4 We recognise that the pandemic has brought significant change already to day service users, carers and staff; and that this proposal will continue this. Service users may need intensive support to go through this change. As previously noted, for Riverside and PD Day Opportunities, we think that this support can be provided by staff at the community support hubs proposed under Recommendation 3. For Pritchard's Road, we are proposing to recruit

a Support Worker to work with service users until March 2022 to work with service users to support them through the change and to access or design alternatives.

3.10.5 The consultation flagged concerns that closing PD Day Opportunities, Riverside and Pritchard's Road day centres might result in a deterioration in people's physical health, mental health and/or social isolation. The proposals outlined in this report are designed to mitigate against this, and indeed are designed to promote the things that people said is important to them: social contact, providing safe spaces, information and advice and activities that promote physical and mental health. The consultation has also flagged concerns that closing day centres might result in an increased burden being placed on carers. In addition to the proposals in this report that mitigate against this, we will continue to put a focus on offering Carer Needs Assessments to ensure that the needs and wishes of carers are at the heart of support planning.

3.11 Financial implications of the proposal

3.11.1 We currently invest £7.1m in day services provision, broken down as follows:

	Budget 2020-21 (£)	Current forecast outturn @ P5 2020-21 (£)
Commissioned day services	5,190,542	5,371,606
In-house day services	1,906,874	1,680,905
Total	7,097,416	7,052,511

3.11.2 As previously noted, this proposal builds on a previously agreed saving of £316,000 per year from 2021-22 in relation to day support (see next section). The proposal equates to an additional saving of £252,000 per year from 2021-22.

3.11.3 The closure of the three in-house services would generate gross savings of £1.017m. We are proposing that an initial amount of £450k from the gross saving be reinvested in reconfigured day support services. The amount reinvested may be reduced as alternative community provision is developed and service user needs are better understood through social care reviews. The estimates are broken down in the table on the next page:

Item	Estimated cost 2021-22	Estimated costs 2022-23 onwards
A fixed-term Community Support Worker post May 2021 to March 2022 for Pritchard's Road service users	£26,666 ¹³	-
Direct payments for a proportion of service users	£123,500 ¹⁴	£148,200
Alternative external placements who need them (e.g. Headway)	£30,000 ¹⁵	£36,000
Extension of Russia Lane day service to weekend opening	£60,500	£66,000
Additional training for day support staff	£5,500 ¹⁶	-
Shared Lives Coordinator and programme costs	£54,000	£65,000
Investment to transform day support to community support hub: Staff, activities and materials, rental costs for spoke site activities, transport	£123,750	£135,000 ¹⁷
Total	£424,000	£450,200

3.11.4 The creation of a community support hub and/or the cost of accessible adaptations and/or enhanced IT and digital technology in the service is likely to result in a requirement for additional capital spend to meet the specification. We will apply for capital funding as part of the Invest to Save programme, of which part is expected to be Community Infrastructure (CIL) funded. Where there is a prospect to use a building in the medium to long term and where necessary, fully accessible toilets could be installed including hoist, changing table and bathing facilities (retrofitted about £50,000 per toilet). Depending on the building(s) used, additional investment could be made in a professional kitchen that could also be adapted to be used by service users (estimate awaited). An initial investment in 10 i-pads and 10 laptops estimated to cost £13,000¹⁸ could foster digital inclusion between staff and services users and between service users themselves. It also would support service users who lack mobility with practical tasks e.g. access to online services, connecting with family who live far away and also support staff to be mobile and keep records up to date while out and about.

¹³ Based on £40,000 per year / £33,333 May 2021 to March 2022.

¹⁴ Based on 22% of 86 service users = 19 service users. Average cost of in-house day service placement including transport: £60 per day. 19 service users attending 2.5 days per week = £2,850 per week / £148,200 per year / £123,500 from May 2020 – March 2022.

¹⁵ Based on 3 service users attending alternative provision costing £100 per day, 2.5 days per week = £750 x 48 weeks = £36,000 per year / £24,000 May 2020 – March 2022

¹⁶ Based on costings submitted by Sonali Gardens in January 2021, based on assumption that training can be shared across both hubs

¹⁷ Provisionally calculated as follows: £100,000 pa additional staffing, £10,000 activities and materials, £10,000 rental costs for spoke site activities, £15,000 additional transport costs

¹⁸ Approximately £500 per i-pad, £800 per laptop. We will seek to meet the cost of tablets, laptops and/or touch screens through capital funding and/or the Disabled Facilities Grant and we will also look at corporate donations in relation to this.

3.11.5 As previously noted, the proposed closure of the three day centres will impact on the council's Transport Services Unit. We intend to carry out modelling work to look at the potential scenarios and impacts resulting from the changes proposed in this report.

4. EQUALITIES IMPLICATIONS

4.1 Age

4.1.1 A significant proportion of adult social care users are aged 60 or over¹⁹, as are a significant proportion of day care users. The proposal will have an impact on older people and older people with dementia. More information is included in the attached Equality Analysis (to follow).

4.1.2 An analysis of the protected characteristics of impacted staff is in the attached Equality Analysis.

4.2 Disability

4.2.1 The nature of adult social care is such that a high number of social care users are likely to have a disability²⁰. The proposal will have an impact on adults with a physical disability, learning disability or mental health issue. More information is included in the attached Equality Analysis.

4.2.2 An analysis of the protected characteristics of impacted staff is in the attached Equality Analysis.

4.3 Ethnicity

4.3.1 The ethnicity of staff, service users and carers in adult social care is diverse²¹. The proposal may have an impact on adults of different ethnicities and the current model. More information is included in the attached Equality Analysis.

4.4 Other protected characteristics

4.4.1 Please see the attached Equality Analysis for more details.

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.

¹⁹ As of June 2018, 61% of adult social care community-based service users were aged 60 or over.

²⁰ 64% of service users primarily need physical support. 21% primarily need support related to a learning disability. 11% primarily need support related to a mental health issue

²¹ As of June 2018, 38% of adult social care community-based service users were of a White ethnic background. 38% were of an Asian ethnic background and 14% were of a Black ethnic background. In the 2011 Census, 33% of carers in Tower Hamlets are a White British ethnic background and 43% were of a Bangladeshi ethnic background.

- Data Protection / Privacy Impact Assessment.

5.2 The key statutory implications relate to the 2014 Care Act, as outlined in section (7). Equality Analyses are appended to this report in accordance with the 2010 Equality Act.

6. COMMENTS OF THE CHIEF FINANCE OFFICER

6.1 The total annual revenue budget 2020/21 for the three in-house day centres Pritchard's Road, Riverside and PD Day Opportunities is £1.032m. Projected forecast revenue expenditure at period 8 was reported at £0.723m, representing an underspend of £0.309m. However, the current financial year underspend is due to day service closures during the Covid-19 pandemic.

6.2 Associated MTFs savings targets for the Day Services Redesign Project of £569k for 2021/22 will need to be delivered from this budget, net of recommissioned services for existing clients. This saving has been derived from the projected saving from closures of the three in-house day centres of £1.017m less planned re-investment of £450k into the day centre reconfigurations. Any delays or slippage in delivering the saving in-year will be absorbed within the overall Adult Social Care budgets and built in as part of the Adult Social Care recovery plan. Delivery of this saving will be monitored as part of the MTFs savings tracker.

6.3 The investment required for the reconfiguration of day support services at Russia Lane and community support hubs, estimated at £450k, will be funded via the budget released from the three day centre closures. Any slippages on closure dates from May 2021, or any increases in reconfiguration costs, currently anticipated at approximately £35k per month (for 21/22) and £38k per month (from 22/23 onwards), will need to be met from the saving that is released.

6.4 The net saving that will be delivered will also be dependent upon the reviews on service users that currently use the day centres planned for closure and the resulting support packages required. Any increase in package costs that result will need to be met from the saving that is released.

6.5 The impact of the closures of the three day centres on the recharges from the Council's Transport Services Unit is still to be evaluated, and the financial implications arising from a reduced recharge figure for a reduction on transport usage is being finalised.

6.6 The PD Day Opportunities site currently has a lease arrangement for a 15 year from November 2018, and any delay in the transfer of this lease for a new provision, would incur additional costs of £2,250 per week for 24-hour security, that will need to be met from any savings that are delivered. To mitigate this risk, the transfer of the lease arrangements of these sites must be planned, and delivered, in a timely manner.

6.7 No savings associated with these proposals are attributable to the Corporate Landlord model.

7. COMMENTS OF LEGAL SERVICES

7.1 Part 1 of the Care Act 2014 requires local authorities to provide services for adults with care needs and to prevent or reduce the need for future care and support. In addition, Section 3 of the Local Government Act 1999 requires local authorities to achieve best value for the way in which their functions are exercised, and Section 149 of the Equality Act 2010 imposes the public sector equality duty, requiring a local authority in the exercise of its functions to have due regard to the need to eliminate discrimination and

advance equality of opportunity and foster good relations between people sharing a protected characteristic and those who do not.

7.2 The proposals set out in this report comply with the above legislation.

Appendices

Appendix I: Description of the community support hub

Appendix II: Overview of existing day support provision in Tower Hamlets

Appendix III: Summary of Toynbee Hall coproduction exercise

Appendix IV: Equality Analysis for service users

Appendix V: Equality Analysis for staff

Appendix VI: Think Local, Act Personal model of community-centred support

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

- NONE

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Appendix I: Description of community support hub

Overall, the vision is to have a community support hub that acts as a flexible 'base' for people to access the huge and vibrant range of activities that are available to people living in Tower Hamlets, dropping into the building itself as needed; whilst providing a safe space and incorporating the things that service users have told us are important to them. This document describes what this could look like in more detail.

Example case studies

Mr A normally goes to the hub on a Tuesday lunchtime, using a direct payment to get a taxi to travel there and back. He goes to check his email, have lunch at the café and to see what the activities programme is for the week. Based on this, Mr A attends a book club group that afternoon at the hub. He signs up for a gardening session at a 'spoke' site the following day, and for an exercise class targeted at older people run out of a leisure centre on Saturday.

Mrs B goes to the hub three days per week, preferring to have a structured routine that works for her and her family. Mrs B talks to hub staff about what she wants to do, discussing her interests and needs. Hub staff plan out activities with Mrs B, noting that she needs support with transport and access to toilets that are fully accessible. As a result, on a Monday, Mrs B attends a gardening session and arts class at the hub. On a Tuesday, Mrs B meets friends at a Linkage Plus centre for a coffee morning. On a Wednesday, Mrs B helps run a cooking class at the hub which is open to visitors.

1. What is the community support hub?

Building and staff

- The hub will be based in one building, although activities will be planned across a range of sites ('spokes'). Support staff will be based in the hub and work primarily from that site.
- The hub will provide a safe space and there will be staff presence on-site to provide support when needed.
- The role of hub staff will include information and advice provision as and when needed – e.g. a service user needing support with benefits could get advice or be signposted to specialist advice provision.
- Staff will work with service users to identify their interests and support them to access tailored activities designed around their likes and dislikes. Each service user will be supported to decide how they would like to spend their day. Staff will then support service users build connections with the things and people that are important to them and will work through considerations such as transport with service users.
- Staff will facilitate some of the activities in the hub – e.g. facilitating peer support groups.
- Staff will organise other activities in both hubs and spokes – e.g. organising a yoga class in another location.
- Staff will have strong links with the reablement service, taking a 'reablement approach' in supporting people to be as independent as possible. Reablement staff can also work on-site and from the hub as needed.
- Staff will have expert and up-to-date knowledge of the needs of older people and adults with a physical disability and the activities and facilities available in the local area. Community languages will be spoken.
- A network of volunteers will supplement the work of staff.
- In addition, advocacy support will be available to service users to resolve issues (e.g. difficulties in resolving a housing issue). Depending on needs and preferences, this advocacy can be offered directly by hub staff to through our commissioned advocacy services.

Activities

- Activities organised through the hub will enable people to come together and socialise: People will be able to spend time with others with whom they have a shared understanding based on their age or disability. Some facilitation may be needed to support people to do this.
- Activities will reflect user needs and wishes. Based on the consultation results, this includes activities that build skills, confidence and improve mental and physical health.
- Taking a reablement and strengths-based approach, activities will support people to be as independent as possible. Service users can share skills and contribute to their communities.
- Some activities will take place in the hub building, such as gardening or cooking classes.
- Some activities will take place in other sites ('spokes'), such as coffee mornings or book clubs. Some of these activities will need to be organised by hub staff, some will be pre-existing activities that the hub can promote
- The hub will hold a schedule of weekly activities available in the hub, in spokes and in other services or facilities (e.g. Idea Stores). The hub will have strong links with Linkage Plus centres and the activities run from these.
- Some activities will be digital and service users will be supported to access these

Facilities

- The hub will provide a welcoming, safe and inclusive environment for visitors.
- It will have a range of rooms and flexible spaces for different activities, including a kitchen area and garden.
- It will include meeting rooms to enable private meetings between service users and staff.
- The hub or spoke sites will include a social enterprise café, run by service users, open to all, providing a place to meet and use or develop skills.
- There will be internet access and a focus on digital inclusion.
- Assistive technology will be on-site.
- The hub will have fully accessible toilets and changing facilities.
- The spoke sites will give service users access to a wider range of facilities – e.g. sports facilities or pottery rooms.
- Transport facilities will be thought through: For those who need support, options include hub-owned transport and direct payments for people to travel by taxi.

Where is it?

- We recommend that the hub be based at Sonali Gardens.
- Spoke activities – arranged by the hub - could be at a range of locations including Idea Stores, Pritchard's Road and/or an accessible site on the Isle of Dogs. For example, weekly pottery classes or IT classes could be held at Pritchard Road. A calendar of activities in spoke will be held by the hub.
- As previously noted, the hub will link in with a range of other activities taking place around the borough. This includes activities in Linkage Plus centres, leisure centres and Idea Stores around the borough.

When will it open?

- The hub will be open seven days a week.
- The hub will be a flexible service that enables people to come and go in line with their needs and interests.
- However, there will be the ability for people to agree a structure or routine in when and where they get support if they want to.

Who is it for?

- The hub will be targeted at older people and adults with a physical disability, but also open to adults with mental health issues and those with a learning disability.
- It will be available for service users who currently attend Riverside and PD Day Opportunities, pending a review meeting to discuss individual needs and wishes.
- Although it is not targeted at adults with a mental health issue, the hub will be available to current Pritchard's Road day service users, pending a review meeting to discuss individual

needs and wishes. This includes service users being able to take part in activities that take place in the hub and/or spoke sites.

- It will be available for new people who are eligible for social care following a Care Act social care assessment, using our existing referral routes into social care (e.g. via GPs, self-referrals, referrals following a period of reablement).

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Appendix II: Overview of existing day support provision in Tower Hamlets

Day service	Target user group	Capacity per day	Average daily attendance 2019-20	% of capacity	Active registered users Pre-COVID	Building owner	In-house or commissioned	Contract end date (if commissioned)
Russia Lane	Dementia	25	13.6	54.8%	25	Council owns freehold	In-house	n/a
Pritchard's Road day centre	Mental health	62	8	13%	52	Council owns freehold	In-house	n/a
Riverside day centre	Older people	30	11	37%	19	Council holds long lease	In-house	n/a
PD Day Opportunities	Physical disability	15	6.5	41%	17	Council owns freehold	In-house	n/a
Create	Learning disability	25	22	87%	49	Council owns freehold	In-house	n/a
Sundial Centre	Older people	30	12.8	42.8%	34	Not Council	Commissioned	Dec 2021
Sonali Gardens weekend	Older people (Bangladeshi community)	12	8.5	70.5%	99	Not Council	Commissioned	Dec 2021
Sonali Gardens weekday		40	31.9	79.8%				

Targeted day support with wider, 'universal' access include the following (please note this is not an exhaustive list):

Day support	Target user group	In-house or commissioned	Description
5 x LinkAge Plus Centres	Older people	Commissioned	Five centres at Age UK East London (Appian Court), Neighbours in Poplar (St. Matthias Community Centre), Sundial Centre, Sonali Gardens, Toynbee Hall. Aimed at residents aimed 50 years or older. Includes information, advice, social activities and fitness sessions.
Working Well Trust	Mental health	Commissioned	Supported employment opportunities to those most distant from the work market. Social enterprise approach which empowers people to 'help themselves and the community'.
Mind Community Connecting Service	Mental health	Commissioned	Specialist sessional workers/social enterprises to deliver activities which deliver against the 5 ways of wellbeing such as physical health, yoga, arts or cooking. Strengths-based model of coproduction which recognises service users as equal partners in the delivery of activities giving priority to activities and groups led by service users.
Recovery	Mental health	Commissioned	Covering three academic terms a year, the

College			contract delivers an educational model of courses which cover the areas relevant to mental wellbeing and recovery such as 'discover yourself', 'understanding health', 'life skills' and 'getting involved'.
Hestia 1:1 support	Mental health	Commissioned	1:1 and peer support service to enable those most severely disabled by their mental health conditions to access the community and other services which will improve their mental health.
Alzheimer's Society	Mental health	Commissioned	Support services and 'Dementia Cafes'.
Look Ahead and Outward Outreach	Mental health	Commissioned	Outreach 1:1 support for people with enduring mental health needs.
Tower Project Jobs, Enterprise and Training service	Learning disability and autism	Commissioned	Information, advice and support into employment. Includes a number of social enterprises that provide supported work placement and paid employment opportunities for local disabled people and a stepping-stone to mainstream employment.
Caxton Hall	Older people	Commissioned (LCF)	A dynamic activity centre led by older people.
Friends at Home	Older people	Commissioned (LCF)	Matching housebound older people with volunteer befrienders.
Older Peoples Befriending Project	Older people	Commissioned (LCF)	Befriending and advocacy, one-to-one support at home, organising small group outings locally.
Vietnamese and Chinese Lunch and Social Club	Older people	Commissioned (LCF)	Healthy lunches and social and health promotion activities for people aged 50 or over from the Vietnamese and Chinese community in Tower Hamlets.
'Feeling Good!' Wellbeing Project	Older people	Commissioned (LCF)	Nutritious lunches and opportunities for indoor sport, IT learning, singing, art, intergenerational activities.
Tower Hamlets LGBT Support	Older people	Commissioned (LCF)	Support to enhance peer networks, lessen isolation and provide mental health crisis prevention support. Two facilitated support groups.
Wellbeing Centre Toynbee Hall	Older people	Commissioned (LCF)	Holistic relational support to older people aged 50 or over. Build stronger networks of information sharing and peer support between users and those not accessing services.
Stifford Centre Limited	All	Commissioned (LCF)	Free membership health club with over 20 difference classes and groups.
ICM Foundation CIC	Learning disability	Commissioned (LCF)	20 people with learning disabilities work with ICM Foundation to design and deliver 5000 accessible newspapers on the theme of health and wellbeing, 3 times each year.
Limehouse Project	Older people	Commissioned (LCF)	DigitIES workshops to prevent digital exclusion in older adults
Newham New Deal Partnership	Older people	Commissioned (LCF)	Learning in groups to build the confidence of people aged 50 or over to go online using tablet devices.
Wapping Bangladeshi Association	Older people	Commissioned (LCF)	ICT and internet training for socially isolated BME older adults aged 55 and over who are not computer literate and are digitally excluded.

Bromley-by-Bow Centre Creative Communities	All	Commissioned (LCF)	Community-based programme to increase the participation and readiness for employment in the creative sector of at least 180 people from under-represented communities.
8 x services for older people	Older people	Small grants programme	8 services – including Lunch Clubs, coffee mornings, information and advice – for older people funded through the small grants programme.
Bow Haven	Mental health	n/a	Mental health charity with a range of co-produced and peer led mental health support groups.
Carer Centre Tower Hamlets	Carers	Commissioned	Carer needs assessments, information, advice, activities, peer support, retreats, mindfulness.
Respite and carer relief	Carers	Commissioned	Range of respite provision outside the home and carer relief (e.g. homecare) in the home
Ability Bow	PD		Supporting people with disabilities or long-term health conditions to do exercise

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Appendix III: Summary of Toynbee Hall coproduction report.

Please note that this summary has been produced by the local authority, based on the text provided by Toynbee Hall (the text has not been changed).



Independency or learned helplessness:

A co-designed day centre service model
in Tower Hamlets

Oct 2020

1. Introduction

Toynbee Hall Research and Policy Team were commissioned by the London Borough of Tower Hamlets to:

1. Engage with a wide range of stakeholders, from service users and carers to providers and their staff, the voluntary and statutory sector;
2. Co-design a new service operating model for day opportunities services for older people which will operate for 3-5 years.

This co-design work explored the following questions:

1. Current service model:
what works well, what is missing and what can be stopped? How services can be integrated and what could be the flexibility of services?
2. Individual needs and experiences:
why individuals use the services and why they stop, what impact services have on an individual's independence, what users and carers want from future services, what is the impact of Covid-19 and what are the ways to mitigate it?
3. Eligibility check and direct payments:
Where are individuals referred/signposted to when they do not meet eligibility requirement, what barriers are there for users taking a direct payment?

The focus of these discussions was on people's aspiration and desire for the future service model, and the service model demonstrated in this report has been identified and shaped directly by the participants. This process included the following three aspects:

1. Co-design with day centres
 - 5 meetings and 1 workshop with 5 day centres
2. Co-design with service users and carers
 - 9 workshops and 1 interview in English
 - 2 workshops and 8 interviews in Bengali and Urdu
 - 98 surveys
3. Co-design with stakeholder organisations
 - Workshops with organisations
 - Interviews with key stakeholders

Using this approach, we have involved:

- 12 day centre staff members
- 115 users and 26 family members (we call them carers in this report). See details in the chart about numbers of users and carers from each day centre.
- 18 stakeholders

Finding	Future model
<p>Impact of Covid-19: The “shielding” and isolation has demonstrable impacts on users’ mental and physical health. Users and carers noted that, while staying at home is a safety measure, they see “no quality of life” and users’ conditions have deteriorated.</p>	<p>Users and day centres want the centres to re-open as soon as it is safe and possible to do so. If centres have to remain closed however, then support can be delivered as a tiered model.</p>
<p>Diversifying support channels: Day centres have applied different methods in supporting users during centre closures.</p>	<p>A tier-based approach could be useful in delivering outreach, telephone and online services. Users who are more comfortable with group phone calls or digital activities can make use of these centre-provisions, while other higher-needs users could benefit more from outreach visits and walks.</p>
<p>Independency vs. learned helplessness: A key learning was the need for services to “<i>change the mindset</i>” (<i>stakeholder</i>) of service providers. As stakeholders reflected here, are we supporting people to live in a “<i>normal</i>” and independent life, or are we creating a structure for “<i>learned helplessness</i>”?</p>	<p>We want a service that supports people to feel able and “normal” within wider society, not one that makes them feel different from the rest of the society or reliant on others. This means that (to name a few):</p> <ul style="list-style-type: none"> - Users can attend day centre for a few hours, rather than a full day or a half day. - There could be a transport allowance in personal budgets - Support in managing finance can be included in personal budgets, - More support is provided for connecting users with other services and support. - People can attend activities altogether, regardless of which day centres they are from, - Users can have natural friendships outside the centre.
<p>Reablement: Reablement should be at the core of service delivery.</p>	<p>People should be referred to universal services rather than day centres if they only need some support in socialising. For each day centre user, a set of meaningful goals needs to be identified and staff should support users to achieve these goals. Day centres should link up with occupational therapists.</p>

Finding	Future model
Contributing to society: Service users enjoy supporting each other in the centre and contributing to society through ways that they are able to.	Staff should encourage peer support in all centre activities. We recommend making it easier for users to contribute, be it to the centre or society in general.
Having ownership of the services: This refers to users and carers having a choice of activities and support, co-creating services, and playing an active role in evaluating service delivery.	A change of mind set is required so users and carers are not considered as receivers of the services, but the owners of it. They should be encouraged to steer their own paths, create ideas and play an active role in the delivery and evaluation of services.
Personalisation: Every user is different, and we can see that there is space to develop personalisation in the services.	Users and carers suggested that a wider variety of activities and support can be available for users so users can make a choice based on their interests and circumstances. These activities and support can be universal services, outside the day centres
Flexibility: Users and carers felt that they have good flexibility when rearranging dates in advance. However, they would like more flexibility attending the day centre, particularly if an emergency arises.	A future model could allow for emergency appointments, perhaps a set number of additional places at the centre each day for this. Having the centre operate on weekends could suit some users and carers better.
Who is providing care: Not only staff members and carers are providing care; users, volunteers, mutual aid groups and other community members can all be involved in supporting each other and providing care.	Partnership working needs to be promoted involving centre staff, users, carers, other community members, and in fact a variety of stakeholder organisations.
Staff members: There were numerous descriptions of the centre staff as “skilled”, “thoughtful” and “absolutely brilliant” (users and carers). However, the professionalism and support provided by staff at specific centres remains a concern for a small number of carers.	Staff members should continue to maintain a high level of professionalism and skills. Even though day centres and the local authority have a comprehensive system in dealing with complaints, the system does not seem to work well for a small number of users and carers.
The need for building-based services: Currently there are five day centres across Tower Hamlets, and it has become a routine for current users to attend day centres. It is important to maintain a level of continuity so users feel safe and secure. In addition, we need to address the need to maintain a building-	In light of the Council’s plan to reduce building-based services, we propose to maintain three buildings: <ul style="list-style-type: none"> - One building will provide specialist service for people with dementia; - Two buildings will serve as both generalist static centres

Finding	Future model
<p>based service for those with severe mental illnesses. This was reiterated by many users and carers, especially those with dementia.</p>	<p>and “activity hubs” which could be the meeting points for community-based services</p> <ul style="list-style-type: none"> - The priority for building spaces could be reserved for users with a higher level of needs, but with the choice available for these users to attend community-based spaces, supported by a carer - Have staff who speak local languages including Bengali - Able to provide culturally appropriate food - A range of different activities should be provided to users in order to suit different needs. - Located in different parts of the borough - Fully accessible disabled toilets with changing places and hoists etc
<p>The need for community-based services: Many users cited how the opportunity to go outside of the centre, whether for fresh air during walks or visiting new spaces like museums, was an enjoyable aspect of using the day centre. We have also noted weak integration between day centres and universal services, such as Linkage Plus and community spaces, even though some universal services in fact provide better holistic, specialist and community support.</p>	<p>A dedicated group of staff and volunteers can coordinate and support a number of interests groups outside the centre buildings. These activities will be identified by users’ interest. All building-based and community-based activities can be organised in a set schedule (e.g. unchanged for 2 months) so users can follow a routine that they choose.</p>
<p>Integration of services: There is a need to improve integration between day centres and other services. For example, home care services, occupational therapists and physiotherapists were often talked about in our discussions with users and day centre staff. Better collaboration will ensure all services better support the users.</p>	<p>It was suggested that key stakeholders can establish a working group and meet in monthly meetings.</p>
<p>Accessible toilet facilities: The lack of free access public toilets has been an issue for Tower Hamlets and many other boroughs. There are only a small number of places where fully accessible disabled toilets are available. This prevents users from accessing community spaces for long periods of time and</p>	<p>Community activities and interest groups can be organised for a few hours a day so toileting will be less problematic. We can stratify the model into tiers, where lower-needs users could make use of public, disabled access toilets or ordinary public bathrooms, and higher-needs users could make good use of the static centres</p>

Finding	Future model
is an obstacle to a community-based services model.	which would need to have fully accessible facilities. More importantly, local authority should work with idea stores, leisure centres, community organisations and businesses to increase fully accessible disabled toilets
Transport: A common issue for many users is the time it takes to travel to day centres	A combination of council/centre-dedicated buses and self-arranged transport should be available for users. We recommend that for the day centre users, council or centre buses should be maintained to support some users especially those with wheelchairs and a higher level of dementia. In addition, self-arranged transport should be encouraged and supported by personal budgets.
Inclusive services: There was a strong interest from all users to mix with people from different ethnicities, although language barriers remains a concern. There is a divide among the Bengali community about whether segregating men and women is essential. An overall perception was that people over 60 are happy to mix with each other, and younger users may choose to withdraw from building-based services if the majority of users are over 60. A general perception was that people would welcome mixing people with early stage dementia with other users, and would prefer users with advanced dementia to have their own day centre	Users will welcome culturally appropriate day centres. Centres can provide culturally appropriate food and encourage users to share food from their own culture. This would help users feel at home and allow people from different ethnicities to learn about each other's culture. Barriers in terms of communication could be addressed by having staff and volunteers who can speak local languages to help facilitate conversations. Users should also have the option to choose how they arrange themselves at the centre in terms of segregating or not. Diversity should be maintained and encouraged.
Information about day centre service: Knowledge of day centre service for both prospective users and other health and social care teams is limited, and more could be done to raise awareness of the availability of services, especially as many are undersubscribed.	Promotion and awareness of centres is vital for potential users to receive the assistance available to them. Leaflets, for example, can be distributed through carers centres, GPs and local newspapers.
Information and support on direct payment: There is an absence of information, or substantial misinformation, surrounding direct payment and how it works. All users and carers we spoke to either did not know about direct payment, have been told there is a long waiting list for direct payment, or	We welcome the council's current initiative to promote direct payment and provide support on direct payment. Stakeholders noted that it is key to involve carers centres in the promotion, and they recommended that allowance can be allocated in personal budgets to enable users to receive ongoing support in managing

Finding	Future model
did not know support is available to apply for it.	direct payment.
Referral: Referral seemed to be one of the most difficult parts of the user journey.	When people are not eligible for the day centre services, they should be referred, not signposted, to universal services. Users should be encouraged and supported to take up direct payment so they can access universal services with support.
Trust in services: There was a discrepancy between how service users viewed the day centres and how they viewed the council, even though day centres are fully funded and managed by the council. Service users and carers were largely praiseworthy of the help and services that day centres offer but were depreciative and dismissive of the works of the council.	The perceptual distance between the actual services and the local authority only reinforces the negative images of the council and social care; as such, more should be done to promote the branding of these centres, as funded effectively by the local council. Better communication and true co-production can also strongly develop trust between communities and local councils.

In order to develop a future service that supports independent living, we have identified some key actions which can be implemented short term – to be considered under current service model - and long term for the new service provision.

Short term:

- Local authority to provide information and support on direct payment, and include allowance in personal budgets to support people managing direct payment.
- Local authority to form a monthly working group involving day centres, brokerage team, social work team, hospital discharge team, occupational therapists and physiotherapists.
- Day centres to develop a tiered-based approach to deliver outreach, telephone and online support during lockdown.
- Day centres to improve branding and distribute information on service provision.

Long term:

- Local authority to develop the hybrid model of building-based and community-based services.
- Local authority and day centres to include users and families in service creation and evaluation.
- Local authority to include transport allowance in personal budgets to encourage the use of self-arranged transport options, and continue providing council or centred-owned buses.
- Local authority (Locality Teams) and day centres to identify any gaps in the complaints system and work with users and families to improve it.
- Local authority to increase fully accessible disabled toilet facilities.
- Local authority to reduce paper-work and deliver people-centred support.

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Equality Impact Analysis: (EqIA)

Section 1: Introduction

Name of Proposal: Revised approach to day support in adult social care
For the purpose of this document, 'proposal' refers to a policy, function, strategy or project)

Service area & Directorate responsible: Health, Adult and Community Services Directorate. Jointly held across adult social care and integrated commissioning.

Name of completing officer: Joanne Starkie, Head of Strategy and Policy for Health, Adults and Community services.

Approved by Director/Head of Service Claudia Brown and Warwick Tomsett

Date of approval 18th January 2021

Conclusion - To be completed at the end of the Equality Impact Assessment process

This summary will provide an update on the findings of the EIA and what the outcome is. *For example, based on the findings of the EIA, the proposal was rejected as the impact on a particular group was disproportionate and the appropriate mitigations in place. Or, based on the EIA, the proposal was amended and alternative steps taken)*

The Equality Analysis has identified risks associated with one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the *Action Planning* section of this document.

See
Appendix A

Current
decision rating



The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity between those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them

Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

This Equality Impact Assessment provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above, for more information about the Council's commitment to equality; please visit the Council's website.

Section 2 – General information about the proposal

Provide a description of the proposal including the relevance of proposal to the general equality duties and protected characteristic pursuant to Equality Act 2010.

This Equality Analysis relates to an October 2020 report on a 'Revised Approach to Day Support in Adult Social Care'. Please see the report for more details on the proposal, aims and objectives of the report.

This Equality Analysis focuses on the impact of the proposed revised approach to day support on service users and carers.

Section 3 – Evidence (Consideration of Data and Information)

What evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

The impact of the proposed options is on adult social care users and carers, and is described in the table in Section 6. The evidence is taken from two main sources:

- Framework-I (the predecessor to Mosaic), which holds information on the protected characteristics of adult social users and carers in community-based services. This includes service users attending day support as well as service users who receive homecare and other forms of community-based support.
- Information directly from day services on the protected characteristics of service users registered to attend Pritchard's Road day centre, Physical Disability (PD) Day Opportunities and Riverside day centre.

The impact of the proposed options is described on the table below.

Overall, the equality profile of adult social care users in community-based services is different to the profile of Tower Hamlets residents, as is the equality profile of carers in the borough. Tower Hamlets resident and carer information¹ is taken from the 2011 Census. Adult social care user information is taken from Framework-I as of June 2018.

Age

Adult social care users are – on average – older than the general population.

- 6.1% of the Tower Hamlets population are aged 65 or over. 74.1% are aged 16 to 64 years old.
- 61% of adult social care community-based service users are aged 60 or over.
- 8.6% of carers in Tower Hamlets are aged 65 or over.

Gender

Women are overrepresented in both the profile of adult social care users and carers compared to the general population.

- 48.5% of the Tower Hamlets population are women.
- 58% of adult social care community-based service users are women.
- 55% of carers in Tower Hamlets are women.

Ethnic background

The ethnic background of adult social care users and carers compared to the general population is different:

- 45% of the Tower Hamlets population are of a White ethnic background, the majority of which are White British (31% overall). 41% are of an Asian ethnic background, the majority of which are Bangladeshi (32% overall). 7% are of a Black ethnic background.
- 38% of adult social care community-based service users are of a White ethnic background. 38% are of an Asian ethnic background and 14% were of a Black ethnic background.

¹ It should be noted that the number of carers known to adult social care is much smaller than the number of carers overall.

- 33% of carers in Tower Hamlets are a White British ethnic background and 43% were of a Bangladeshi ethnic background.

Religion or belief

- 35% of the Tower Hamlets population are of a Muslim faith. 27% were of a Christian faith, and 19% reported no religion.
- 35% of all adult social care users are Christian, 31% are Muslim and 34% have another or no religious belief (please note that unlike the rest of the evidence, this evidence is based on Framework-I data as of January 2016).
- Information on the religion or belief of carers was not available to inform this analysis.

Disability

Disability is likely to be more prevalent for both adult social care users and carers compared to the general population.

- 6.8% of the Tower Hamlets population report a health problem or disability lasting for at least 12 months and limiting day to day activity.
- The nature of adult social care is such that a significant proportion of people are likely to consider themselves to have a disability. 64% of service users primarily need physical support. 21% primarily need support related to a learning disability. 11% primarily need support related to a mental health issue.
- Carers report worse health than the general population: 9% reported bad health compared to 6% overall.

Socio-economic status

There is no like-for-like information to provide a meaningful comparison between the socio-economic status of adult social care users and the Tower Hamlets population as a whole. However, there are some indications:

- 69.8% of Tower Hamlets residents are economically active.
- 57.6% of carers are economically active.

Sexual orientation

Information on sexual orientation is not available in sufficient detail to be able to draw any meaningful comparisons. Office of National Statistics (ONS) information from 2018 indicates that 94.6% of those aged 16 or over identify as heterosexual or straight whilst 2.2% identify as lesbian, gay or bisexual (LGB). The report notes that younger people, men and people in London were most likely to identify as LGB.

Gender reassignment, marriage and civil partnership and pregnancy and maternity

Information on gender reassignment, marriage and civil partnership and on pregnancy and maternity in relation to adult social care users and carers is not available in sufficient detail to be able to draw any meaningful comparisons. Given the age profile of adult social care users, it can be assumed that the proportion who are pregnant or those who fall under the 'maternity' characteristic is lower than the borough average.

Interdependencies

It is worth noting here that age, ethnic background and disability are linked for adult social care users in Tower Hamlets. Proportionately more older people are of a White ethnic background², and proportionately more younger people are of an Asian ethnic background. Proportionately more younger people have a learning disability or mental health issue, whereas there is a higher prevalence of physical disability in the older population.

Consultation

Details of previous engagement and the results of the consultation (including the protected characteristics of respondents) is included in the main report.

² 55% of 60-74 year olds were of a White British ethnic background in the 2011 Census, rising to 63% for those aged 75 or over. The figures for residents of a Bangladeshi ethnic background are 21% and 17% respectively.





Section 4 – Assessing the impacts on residents and service delivery

	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Age (All age groups)	<p>Opportunity to shape personalised support for older people in a way that promotes independence.</p> <p>Opportunity for more intergenerational contact.</p>	<p>Some older service users who have attended for a number of years will likely not want change.</p> <p>Risk of less opportunity for people of the same age to come together and share experiences.</p>	<p>Proportionately more older people are impacted by the proposal.</p>	<p>Overall, people aged 55 to 64 years make up the biggest single age group attending Pritchard’s Road (23 members were this age as of September 2020) and PD Day Opportunities (7 members were this age). Everyone attending Riverside day centre is over the age of 65. This is broken down further below:</p> <ul style="list-style-type: none"> - Pritchard’s Road: Of the 52 current members, 3 are under the age of 34. 41 are aged 45 or over. 23 are aged 55-64 years. - PD Day Opportunities: Based on the data of 17 attendees, 2 are under the age of 34. 14 are aged 45 or over. 7 are aged 55-64 years. - Riverside: Based on the data of 19 attendees, all are aged 65 or over. Ages range from 68 to 96 years. <p>Furthermore, the proposal has implications for commissioned day support and the future redesign of older people’s day support services. These are currently Sonali Gardens and the Sundial Centre.</p> <p>Overall, the proposal will have an impact on age in the ways listed below. In all cases, the biggest impact will be felt by users of Riverside, Pritchard’s Road and PD Day Opportunities:</p> <ol style="list-style-type: none"> i. Proportionately more older people will be impacted by the change, given the profile described above. Changing the model will mean change to how services are arranged for older people. ii. The current model enables people of a similar age to spend time together. Moving to more of a community hub model may shift this to an extent, as the idea of a hub is for people – where possible – to get out and about in their communities more. iii. Provisional feedback from staff is that a traditional day centre model is an increasingly less attractive option for adults of working age coming into adult social care for the first time. iv. Conversely, a number of Pritchard’s Road service users have been attending services for a high number of years (i.e. more than 10) and have strong ties to the service and staff. It’s likely and suggested in consultation responses that the older members will have a preference for traditional building-based day centres and could find service closure difficult to accept. v. Coproduction was carried out with older people who use older people’s day services (Riverside day centre, Sundial Centre, Sonali Gardens, Russia Lane) over summer 2020 and with adults with a physical disability (PD Day Opportunities). The initial findings from this are included in the report. The proposal to revise day support is largely aligned to these findings, providing an opportunity to shape support around what older people with social care needs want.
Disability	Opportunity	Risk of less	The proposed	All those who attend Pritchard’s Road have mental health problems. All those who attend PD Day Opportunities have a disability as do a high proportion of Riverside day centre service users. The



<p>(Physical, learning difficulties, mental health and medical conditions)</p>	<p>to shape personalised support for people with a disability in a way that promotes independence.</p> <p>Opportunity to reduce disability discrimination and increase accessibility.</p>	<p>opportunity for people with disabilities to come together and share experiences.</p> <p>Risk that a lack of accessible community facilities, disability discrimination and stigma will prevent people with disabilities making full use of a community hub.</p>	<p>changes will have a disproportionate impact on people with a disability.</p>	<p>nature of the service is such that it is highly likely that most or all service users in other in-house and commissioned day services consider themselves to have a disability, and this is reflected in consultation responses.</p> <p>Overall, the proposal could have an impact on people with a disability in the following ways:</p> <ol style="list-style-type: none"> i. Changing the model will mean change to how services are arranged for people with a disability. ii. The current model enables people with similar experiences based on disability or mental health issue to spend time together. Moving to more of a community hub model may shift this to an extent, as the idea of a hub is for people – where possible – to get out and about in their communities more. iii. There is a risk that people with a disability will not be able to benefit from the proposal to have a community hub as a base for accessing other activities and services in the community as a result of a lack of accessible facilities and transport. This includes a lack of accessible toilets and accessibility issues on public transport. The proposal includes a commitment to do more to promote accessible facilities. iv. There is a risk that people with a disability or mental health issue will not be able to fully benefit from the proposal to have a community hub as a base for accessing other activities and services in the community as a result of disability discrimination and mental health stigma. The proposal includes a commitment to tackle this. v. The new model of day support proposed in the report has been informed engagement and consultation with people with disabilities, providing an opportunity to shape support around what people with a disability who have social care needs say is important to them.
<p>Sex</p>		<p>Risk of an increased burden being placed on unpaid carers – a group where women are overrepresented.</p>		<p>In broad terms, the majority of service users who attend Pritchard’s Road and PD Day Opportunities are male and the majority of service users who attend Riverside day centre are female. The picture for all in-house and commissioned services is likely to be variable. There are no sex-specific services.</p> <p>Carers are more likely to women. Day support often fulfils a dual function of both meeting the needs of a service user and providing carers with a break. There is a risk that the new model might result in changes to care packages that put an increased burden on unpaid carers. This can be mitigated against by offering carer needs assessment at the same time as planned reviews, so that both carer and service users needs can be looked at holistically; by keeping the ability for service users to form a routine or structure (to help carers who work, for example) and by the consideration of weekend opening.</p>
<p>Gender reassignment</p>	<p>Opportunity to access a wider range of support</p>	<p>Risk that transphobia and stigma will prevent people</p>		<p>One person identifies as transgendered in Pritchard’s Road, PD Day Opportunity and Riverside day centres. The remainder have the same gender identity that was assigned to them at birth.</p> <p>Overall, the proposal could have an impact on people who are a different gender to the gender</p>



	that needs individual needs.	of different genders making full use of a community hub.		<p>assigned to them at birth in the following ways:</p> <ul style="list-style-type: none"> i. There is a risk that transgendered people will not be able to fully benefit from the proposal to have community hub as a base for accessing other activities and services in the community as a result of transphobia and stigma. ii. The proposal is intended to provide people with more choice and ability to access community facilities.
Marriage and civil partnership				<p>Information on this is collected at PD Day Opportunities, where 8 service users are married and 9 are single.</p> <p>It is not anticipated that the proposal will have a disproportionately negative or positive impact as it relates to this characteristic.</p>
Religion or philosophical belief	Increased opportunity for people of different faiths to come together.	Risk that community hub / alternative provision is not inclusive for people of different faiths.		<p>Information on this is collected at PD Day Opportunities, where 7 service users are of a Muslim faith and 4 are of a Christian faith, and at Riverside day centre where all service users are of a Christian faith.</p> <p>Overall, the proposal could have an impact on people of different religions or beliefs in the following ways:</p> <ul style="list-style-type: none"> i. There is a risk that people with dietary requirements arising from their faith or belief (e.g. Halal) will not be able to fully benefit from the proposal to have a community hub, if the hub does not provide appropriate food choices. This will be addressed in the design of the hub. ii. The proposal should provide people of different faiths and beliefs with more opportunity to come together.
Race	Increased opportunity for people of different ethnicities to come together.	Risk of language barriers being an issue in community hub.		<p>In broad terms, the majority of service users who attend Pritchard's Road and PD Day Opportunities are from BAME communities and the majority of service users who attend Riverside day centre are of a White ethnic background. This is broken down further below:</p> <ul style="list-style-type: none"> - Pritchard's Road: Of the 52 current members, 56% are from BAME communities. 12 are of an Asian Bangladeshi ethnic background. 44% are of a White ethnic background. - PD Day Opportunities: Based on the information of 17 service users, 7 are of a Black ethnic background and 5 are of an Asian ethnic background. 3 are of a White ethnic background and 2 are of a Turkish ethnic background. - Riverside: Based on the information of 19 service users, 16 are of a White ethnic background <p>The ethnic background of people who use commissioned day support services is likely to be similarly diverse. There is currently one commissioned day support service – Sonali Gardens – that is targeted at people of an Asian Bangladeshi ethnic background.</p> <p>Overall, the proposal could have an impact on people of different religions or beliefs in the following ways:</p> <ul style="list-style-type: none"> i. The proposal may result in changes to Sonali Gardens (the report notes recommissioning of older people's day services will start next year, with a new contract start date of 2022) which



				<p>will impact on service users of an Asian Bangladeshi ethnic background.</p> <p>ii. Initial findings from the coproduction exercise carried out with older people and people with physical disabilities who need day support is that there is a strong interest from all users to mix with people from different ethnicities, although language barriers remains a concern. The risk presented by language barriers could be addressed by ensuring that there are staff who speak community languages who can help facilitate communication.</p>
Sexual orientation	Opportunity to access a wider range of support that needs individual needs.	Risk that homophobia will prevent people of different sexual orientations making full use of a community hub.		<p>Information on this is collected at PD Day Opportunities, where all service users identify as heterosexual, and at Riverside where one service user has not disclosed this information and the remainder identify as heterosexual.</p> <p>Overall, the proposal could have an impact on people who are gay, lesbian or bisexual in the following ways:</p> <p>i. There is a risk that gay, lesbian or bisexual people will not be able to fully benefit from the proposal to have a community hub as a base for accessing other activities and services in the community as a result of homophobia.</p> <p>ii. The proposal is intended to provide people with more choice and ability to access community facilities. For example, no specific LGBT+ groups are run at day support services at present, and the new proposal may support people who want to, to access this elsewhere.</p>
Pregnancy and maternity				<p>No service users at Pritchard's Road, PD Day Opportunities or Riverside are pregnant or on maternity leave. Given the age profile described earlier, this is unlikely to change for the majority of service users attending these or other service aimed at older people.</p> <p>It is not anticipated that the proposal will have a disproportionately negative or positive impact as it relates to this characteristic.</p>

Other				
Socio-economic				<p>It is not anticipated that the proposal will have a disproportionately negative or positive impact on this. All community provision for adults with support needs under the 2014 Care Act is subject to financial assessment, in line with the Charging Policy in adult social care.</p>



Parents/ Carers				Please see previous section on sex / impact on women carers.
People with different Gender Identities e.g. Gender fluid, Non-Binary etc				It is not anticipated that the proposal will have a disproportionately negative or positive impact as it relates to gender identities.
AOB				

Section 5 – Impact Analysis and Action Plan

Recommendation	Key activity	Progress milestones including target dates	Officer responsible	Progress
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		for either completion or progress		
1. Address the risk that some older service users who have attended services for a number of years may not want change / may find change difficult	<ul style="list-style-type: none"> - Staff in the proposed community support hub will support PD Day Opportunities and Riverside SU through the change. The proposed Community Support Worker will support Pritchard's Road SU through the change. 	<ul style="list-style-type: none"> - Community support hub opens May 2021 - Community Support Worker in post May – December 2020 	Christine Oates Shaun Last Maria Kaustrater	To be completed following 3 March 2021 Cabinet
2. Address the risk that the model will result in fewer opportunities for older people and people with disabilities or mental health issues to come together and share experiences	<ul style="list-style-type: none"> - The new model will maintain opportunities for people to come together and share experiences - We will promote the option of pooling together direct payments to organise activities collectively - We will support service users to maintain relationships with one another independently of the service 	<ul style="list-style-type: none"> - Community support hub opens May 2021 - Promote direct payments 	As above	As above
3. Address the risk that a lack of accessible community facilities, disability discrimination and stigma will prevent people with disabilities making full use of a community hub.	<ul style="list-style-type: none"> - We will seek funding to ensure there are more fully accessible toilets includes hoists and changing facilities in the borough - We will agree and carry out further actions to tackle stigma and discrimination - Part of the role of staff (via direct payment or services) is to encourage and support service users to access community provision. 	<ul style="list-style-type: none"> - As above - Agree locations and funding for 1-2 fully accessible toilets / hoist / changing table - Agree a communications plan on tackling stigma for May 2021 onwards 	As above	As above
4. Address the risk of an increased burden being placed on unpaid carers – a group where women are overrepresented.	<ul style="list-style-type: none"> - Carer needs assessments will be offered during service user reviews - Community support hub will enable SU to form a routine / structure if preferred or needed - Community support hub weekend opening is available at Sonali 	<ul style="list-style-type: none"> - Carer assessments / reviews offered March – April 2021 - Community support hub opens May 2021 	As above	As above



	<p>Gardens and will be considered in community support hub</p> <ul style="list-style-type: none"> - Continue engagement with Carer Centre on this topic 			
<p>5. Address the risk that transphobia or homophobia might prevent people of different genders making full use of a community hub.</p>	<ul style="list-style-type: none"> - Community support hub development work & SU reviews will identify any targeted support people may want to access & agree action to ensure service is inclusive - We will link in with Council-wide actions to tackle homophobia & transphobia (e.g. 'No Place for Hate') 	<ul style="list-style-type: none"> - Service user reviews carried out March – April 2021 - Community support hub opens May 2021 	As above	As above
<p>6. Address the risk of the new day support model not being inclusive for people of different faiths.</p>	<ul style="list-style-type: none"> - Community support hub will be designed to meet dietary requirement & prayer facilities of people of different faiths - SU reviews will identify faith-based community activity (e.g. PA to enable visit to Mosque) - We will further work with service users of different faiths to ensure new model is inclusive. 	As above	As above	As above
<p>7. Address the risk of language barriers being an issue in the revised day support model.</p>	<ul style="list-style-type: none"> - Community support hub includes staff who speak key community languages - SU reviews will identify any community language-based activity - We will work further with service users of different ethnicities to ensure new model is inclusive – e.g activities that embrace diversity. 	As above	As above	As above



Section 6 – Monitoring

Have monitoring processes been put in place to check the delivery of the above action plan and impact on equality groups?

Yes?





No?

Describe how this will be undertaken:

This will be put in place following 3 March 2021 Cabinet decision.

Appendix A

Equality Impact Assessment Decision Rating Guide
PLEASE SEE PAGE 1 FOR THE RATING OF THIS PROPOSAL

Decision	Action	Risk
<p>As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act. It is recommended that this proposal be suspended until further work is undertaken.</p>	<p>Suspend – Further Work Required</p>	<p>Red</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.</p>	<p>Further (specialist) advice should be taken</p>	<p>Red Amber</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p>	<p>Proceed pending agreement of mitigating action</p>	<p>Amber</p> 
<p>As a result of performing the EIA, the proposal does not appear to have any disproportionate impact on people who share a protected characteristic and no further actions are recommended at this stage.</p>	<p>Proceed with implementation</p>	<p>Green:</p> 

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Equality Impact Analysis: (EqIA)

Section 1: Introduction

Name of Proposal: Revised approach to day support in adult social care

For the purpose of this document, 'proposal' refers to a policy, function, strategy or project)

Service area & Directorate responsible: Health, Adult and Community Services Directorate, Adult Social Care

Name of completing officer: Christine Oates, Service Manager Localities West and Resources and Shaun Last, Service Manager Adult and Older Peoples Mental Health.

Approved by Director/Head of Service Claudia Brown

Date of approval 18th January 2021

Conclusion - To be completed at the end of the Equality Impact Assessment process

This summary will provide an update on the findings of the EIA and what the outcome is. *For example, based on the findings of the EIA, the proposal was rejected as the impact on a particular group was disproportionate and the appropriate mitigations in place. Or, based on the EIA, the proposal was amended and alternative steps taken)*

The Equality Analysis has identified risks associated with one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the *Action Planning* section of this document.

See
Appendix A

Current
decision rating





The Equality Act 2010 places a ‘General Duty’ on all public bodies to have ‘due regard’ to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity between those with ‘protected characteristics’ and those without them
- Fostering good relations between those with ‘protected characteristics’ and those without them

Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

This Equality Impact Assessment provides evidence for meeting the Council’s commitment to equality and the responsibilities outlined above, for more information about the Council’s commitment to equality; please visit the Council’s website.

Section 2 – General information about the proposal

Page 158
Provide a description of the proposal including the relevance of proposal to the general equality duties and protected characteristic pursuant to Equality Act 2010.

This Equality Analysis relates to an October 2020 report on a ‘Revised Approach to Day Support in Adult Social Care’. Please see the report for more details on the proposal, aims and objectives of the report.

This Equality Analysis focuses on the impact of the proposed revised approach to day support on staff employed in three in house day services.

Section 3 – Evidence (Consideration of Data and Information)

What evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

The impact of the proposed options is on 19 adult social care staff and is described in the table in Section 5. The evidence is taken from one main source:

- Information directly from the HR system on the protected characteristics of staff employed by the Council at Pritchard’s Road Day Service, Physical Disability (PD) Day Opportunities and Riverside Day Service.

The impact of the proposed options is described below.

Age



Of the 19 staff potentially impacted by the proposal to close three in house day services, 7 are in the 55-64 age bracket. Some of these staff may wish to consider ER/VR. For those not wishing to pursue this option, alongside others, the Council will seek to find alternative employment opportunities through the redeployment process.

Gender

Men and women are equally represented in the workforce and therefore, all genders are potentially adversely impacted by the proposal. However, the data does not suggest that any gender group is significantly at risk of greater adversity than any other.

Ethnic background

There is a potential for at least 3 ethnic groups to be adversely impacted by the proposal but the data does not indicate that a single group has a greater adverse impact as 24% have not declared their ethnicity, 25% are Bangladeshi, 25% identify as White and a further 26% as Black.

Religion or belief

Information on the religion or belief of staff was limited and therefore not able to inform this analysis.

Disability

Disability is likely to be less prevalent in the staff group and the available data confirms that 15 staff have declared that they do not have a disability, 4 have not made a declaration.

Socio-economic status

There is a potential for all staff in scope of this proposal to experience an adverse impact through a potential job loss. However, in line with the Council's approach to managing organisational change, support will be made available to identify individual transferrable skills in order that staff can be matched against vacancies in the Council.

Sexual orientation

Information on sexual orientation is not available in sufficient detail to be able to draw any meaningful comparisons. There are however, 12 staff who have identified as heterosexual.

Gender reassignment, marriage and civil partnership and pregnancy and maternity

Information on gender reassignment, marriage and civil partnership is not available in sufficient detail to be able to draw any meaningful comparisons. Any staff who are on long term absence for any reason, including maternity, will be fully consulted on the proposals and kept up to date.

Interdependencies

NA

Consultation

Details of planned future consultation is described in the report.

Section 4 – Assessing the impacts on staff

	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Age (All age groups)		<p>Of the 19 staff potentially impacted by the proposal to close the three in house day services, 7 are in the 55-64 age bracket.</p> <p>There is a risk that staff may not find suitable alternative employment.</p>		<p>From the available HR data, the age breakdown of the staff employed across the three in house day centres is as follows:</p> <p>55-64 = 7 45-54 = 5 35-44 = 6</p> <p>Consequently, the proposals to close the three in house days services could adversely impact on older staff. Many of these older staff have worked for the Council for most of their working life. Some of these staff may wish to consider ER/VR. For those not wishing to pursue this option, alongside others, the Council will seek to find alternative employment opportunities through the redeployment process.</p>
Disability (Physical, learning difficulties, mental health and medical conditions)		<p>There is a risk that staff may not find suitable alternative employment.</p>		<p>Information on this characteristic is incomplete but overall, the proposal could have an impact on staff with disabilities given that alternative employment may not be found. Even though the information on this characteristic is incomplete it is worth noting that out of the 19 staff affected by these proposals, 15 of them report that they have no disabilities.</p>
Sex		<p>There is a risk that staff may not find suitable alternative employment.</p>		<p>Given that there is roughly an even split of female and male staff employed to work across the three in house day centres (female 9, male 10), neither sex is disproportional affected by the proposals to close the day centres.</p>
Gender reassignm		<p>There is a risk that staff may not find</p>		<p>Information on this characteristic is incomplete but overall, the proposal could have an impact on staff how have undergone gender reassignment given that alternative employment may not be found.</p>



ent		suitable alternative employment.		
Marriage and civil partnership		There is a risk that staff may not find suitable alternative employment.		Information on this characteristic is incomplete but overall, the proposal could have an impact on staff who are married or in civil partnership given that alternative employment may not be found.
Religion or philosophical belief		There is a risk that staff may not find suitable alternative employment.		Information on this characteristic is incomplete but overall, the proposal could have an impact on staff with different religions / beliefs given that alternative employment may not be found.
Race		There is a potential for at least 3 ethnic groups to be adversely impacted by the proposals. There is a risk that staff may not find suitable alternative employment.		There is a potential for at least 3 ethnic groups to be adversely impacted by the proposal, but the data does not indicate that a single group has a greater adverse impact. HR information confirms that staff have identified as belonging to the following groups: Bangladeshi – 5 Black – 6 White – 5 Information was not disclosed by the remaining 3 staff in scope.
Sexual orientation		There is a risk that staff may not find suitable alternative employment.		Information on sexual orientation is not available in enough detail to be able to draw any meaningful comparisons although 12 staff have identified as heterosexual.
Pregnancy and maternity		There is a risk that staff may not find suitable alternative		Any staff on long term absence including maternity will be fully consulted on the proposals.



		employment.		
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Other				
Socio-economic		There is potential for all staff to experience an adverse impact through a potential job loss.		The proposal will have a potential negative impact on 19 employees should alternative redeployment opportunities not be found.



Section 5 – Impact Analysis and Action Plan

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
1. To address the risk of staff with protected characteristics being adversely affected by the closure of the three in house day centres that could result in them losing their jobs.	If the proposals to close the three in house days centres are agreed all the staff affected will be involved in a comprehensive consultation that will be undertake under the Handling Organisational Change policy. All the staff will have a review of their skills completed and will be given the opportunity to apply for any suitable vacancies within the Council under the Transfer Policy to minimise the number of staff made redundant. Staff will also be offered the opportunity to apply for ER/VR.	To be completed following 28 th October 2020 Cabinet	To be completed following 28 th October 2020 Cabinet	To be completed following 28 th October 2020 Cabinet
2. Out of the protected characterises there is a potential for the proposal to adversely affect older staff.	If the proposals to close the three in house days centres are agreed all the staff affected will be involved in a comprehensive consultation that will be undertake under the Handling Organisational Change policy. All the staff will have a review of their skills completed and will be given the opportunity to apply for any suitable vacancies within the Council under the Transfer Policy to minimise the number of staff made redundant. Staff will also be offered the opportunity to apply for ER/VR.	To be completed following 28 th October 2020 Cabinet	To be completed following 28 th October 2020 Cabinet	To be completed following 28 th October 2020 Cabinet
3. There is a potential for at least 3 ethnic groups to be adversely impacted by the proposals.	If the proposals to close the three in house days centres are agreed all the staff affected will be involved in a comprehensive consultation that will be undertake under the Handling Organisational Change policy. All the staff will have a review of their skills completed	To be completed following 28 th October 2020 Cabinet	To be completed following 28 th October 2020 Cabinet	To be completed following 28 th October 2020 Cabinet



	and will be given the opportunity to apply for any suitable vacancies within the Council under the Transfer Policy to minimise the number of staff made redundant. Staff will also be offered the opportunity to apply for ER/VR.			
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Section 6 – Monitoring

Have monitoring processes been put in place to check the delivery of the above action plan and impact on equality groups?

Yes?





No?

Describe how this will be undertaken:

This will be put in place following 28th October 2020 Cabinet decision.

Appendix A

Equality Impact Assessment Decision Rating

Decision	Action	Risk
<p>As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act. It is recommended that this proposal be suspended until further work is undertaken.</p>	<p>Suspend – Further Work Required</p>	<p>Red</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.</p>	<p>Further (specialist) advice should be taken</p>	<p>Red Amber</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p>	<p>Proceed pending agreement of mitigating action</p>	<p>Amber</p> 
<p>As a result of performing the EIA, the proposal does not appear to have any disproportionate impact on people who share a protected characteristic and no further actions are recommended at this stage.</p>	<p>Proceed with implementation</p>	<p>Green:</p> 

Appendix VI: Think Local, Act Personal model of community-centred support

Think Local, Act Personal model of community-centred support describes how our vision for day support fits into the wider context of community-based adult social care.



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<p>Cabinet</p> <p>3 March 2021</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Ann Sutcliffe, Corporate Director, Place</p>	<p>Classification: Unrestricted</p>
<p>Neighbourhood Planning: Determination of Limehouse Community Forum Application</p>	

Lead Member	Councillor Eve McQuillan, Cabinet Member for Planning and Social Inclusion
Originating Officer(s)	Steven Heywood, Planning Officer
Wards affected	Limehouse; Shadwell
Key Decision?	Yes
Forward Plan Notice Published	2 February 2021
Reason for Key Decision	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
Strategic Plan Priority / Outcome	<p>1. People are aspirational, independent and have equal access to opportunities;</p> <p>2. A borough that our residents are proud of and love to live in</p>

Executive Summary

Neighbourhood forum designations expire five years after they are initially granted. The designation of the Limehouse Community Forum as the neighbourhood forum for the Limehouse Neighbourhood Planning Area therefore expired on 1 December 2020. The Forum has submitted an application to be re-designated. This report assesses the application against the relevant legislation and guidance.

Recommendations:

Cabinet is recommended to:

1. Refuse the application for redesignation of the Limehouse Community Forum as the designated neighbourhood forum for the Limehouse Neighbourhood Planning Area.
2. Note the specific equalities considerations as set out in Paragraph 7.1.

1. REASONS FOR THE DECISIONS

- 1.1 Tower Hamlets Council has received an application to renew the designation of the Neighbourhood Forum for the Limehouse Neighbourhood Area.
- 1.2 The Council is required to determine applications for the designation of Neighbourhood Forums in accordance with the Town and County Planning Act 1990 (as amended) ('TCPA 1990') and the Neighbourhood Planning (General) Regulations 2012 ('the 2012 Regulations'). The Government's Planning Practice Guidance ("PPG") on Neighbourhood Planning (Ref ID: 41-021-20140306) also provides guidance on the determination of such applications, which states that the role of the Local Planning Authority (LPA) is to take decisions at key stages in the neighbourhood planning process.
- 1.3 Under the modifications to the 2012 Regulations made by the Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2016, the Council must make a decision on applications for neighbourhood forum designations within 13 weeks of starting a consultation on the application.
- 1.4 The officer has assessed the application against the relevant legislation and guidance and has serious concerns about whether it meets the requirements for approval, in particular relating to TCPA 1990 Section 61F(7). A clear majority of the consultation responses received explicitly objected or raised significant concerns about the application. A consultation statement is included as Appendix 5. Having assessed these responses, the officer notes that there is clearly concern within the community over the representativeness of the Forum and over the process of developing the Forum's constitution. While it is not possible from the consultation exercise to determine which side has a majority of the local community in their support, and while the officer cannot take a position on the contentious issues raised without further evidence, it is clear that there is a lack of consensus on whether the proposed forum is eligible and able to represent different sections of the community. In these circumstances, it is unlikely that the proposed forum will satisfy the required condition of promoting or improving the social, economic and environmental wellbeing of the area concerned. Officers are also of the view that the proposed forum's purpose does not reflect the character of the area. A consultation statement is provided as appendix 5.

2. ALTERNATIVE OPTIONS

- 2.1 An LPA may designate or refuse a Neighbourhood Forum application. Where the LPA is satisfied that a prospective Forum meets the requirements of section 61F of the TCPA 1990, the Forum may be approved. Where the LPA is not satisfied that a prospective Forum meets the said requirements, the LPA may refuse the application and must publicise its reasons for the refusal to the prospective Neighbourhood Forum and to the attention of people who live work and carry on business in the proposed neighbourhood area.

- 2.2 In the case of this report, the alternative would be to approve the application. This would be an acceptable alternative, if upon considering this report and the appended consultation statement, Cabinet members reached a different opinion from that of the officer.

3. DETAILS OF THE REPORT

- 3.1 This report provides an overview of the assessment of the Limehouse Community Forum application.

- 3.2 The content of the report is as follows:

- Section 4 provides an introduction to neighbourhood planning
- Section 5 outlines the relevant legislative framework and guidance
- Section 6 provides an assessment of the Limehouse Community Forum application

4. INTRODUCTION TO NEIGHBOURHOOD PLANNING: A COMMUNITY-LED PROCESS

- 4.1. The Localism Act 2011 amended the Town and Country Planning Act (TCPA) 1990 to make provision for neighbourhood planning, which gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.
- 4.2. The legislative provisions concerning neighbourhood planning within the TCPA 1990 are supplemented by the Neighbourhood Planning (General) Regulations 2012 (as amended) and the Neighbourhood Planning (Referendum) Regulations 2012. Planning Practice Guidance issued by the Secretary of State for Communities and Local Government provides detailed advice relating to the neighbourhood planning system, addressing the key stages of decision-making including the designation of Neighbourhood Areas.
- 4.3. Neighbourhood planning provides communities with the ability to prepare a Neighbourhood Development Plan (NDP) and/or Neighbourhood Development Orders (NDO), in Neighbourhood Areas designated by the LPA on application. Neighbourhood planning powers may only be exercised by bodies authorised by the legislation. In a Neighbourhood Area where there is a parish council, only a parish council may make proposals for a NDP or NDO. In Neighbourhood Areas without a parish council, only a body designated by the LPA as a Neighbourhood Forum may bring forward proposals. A Neighbourhood Forum designation expires 5 years after it is made. A Forum can apply for redesignation. If the LPA considers the Forum to no longer meet the required criteria, the LPA can withdraw designation.

- 4.4. NDPs set out policies in relation to the development and use of land in all or part of a defined Neighbourhood Area and may include site allocations, or development principles for allocated sites. They may also include character appraisals and seek to establish community facilities and/or identify areas for public realm improvements. NDOs allow for planning permission to be granted in the circumstances specified and exempt certain types of development, or development in certain areas, or on particular sites, from the usual requirement to apply to the LPA for a grant of planning permission.
- 4.5. Both NDPs and NDOs need to be in general conformity with the strategic policies of the Council's Development Plan: the Tower Hamlets Local Plan (2020) and the London Plan (2016).
- 4.6. An NDP that has been 'made' in accordance with the relevant legislative provisions forms part of the Council's statutory Development Plan and, as such, will be accorded full weight when determining planning applications. NDPs will form a new spatial layer to the Council's planning policy and guidance.
- 4.7. NDP policies will be developed by a Neighbourhood Forum through consultation with stakeholders in their relevant Neighbourhood Area and through engagement with Council Officers. Proposed NDP policies must be supported by an up-to-date evidence base to ensure that they are reasonable, sound and justified. Before the NDP is 'made' it must be subject to pre-submission publicity and consultation, submitted to the LPA for a legal compliance check, publicised for consultation, submitted for independent examination, found by the independent examiner to meet the basic conditions specified in the legislation, and passed at a referendum. Following the Neighbourhood Planning Act 2016, an NDP must be given some weight in determining planning applications once it has passed examination – even before it has passed at a referendum.

Community Infrastructure Levy

- 4.8. The Community Infrastructure Levy Regulations 2010, as amended by the Community Infrastructure Levy (Amendment) Regulations 2013 ('the CIL Regulations') were supplemented by the Government's online PPG on 6 March 2014.
- 4.9. The CIL Regulations, as explained by the PPG, make provision for how CIL receipts may be used in relation to neighbourhood planning in those areas which have Parish Councils and those which do not. Tower Hamlets currently does not have any Parish Councils and, as such, the Council retains the revenue generated by CIL.
- 4.10. The Community Infrastructure Levy PPG states (at paragraph 145) that in areas where there is a 'made' NDP or NDO in place, 25% of CIL collected in the neighbourhood area should be spent in that area. Where there is a parish council in place, the money should be passed to the parish council for them to spend directly. Paragraph 146 states that "if there is no parish or town council,

the charging authority will retain the levy receipts but should engage with the communities where development has taken place and agree with them how best to spend the neighbourhood funding”.

- 4.11. Therefore, where an NDP or NDO has been adopted, the Council is required to consult with the local community as to how this 25% proportion of CIL receipts will be spent. Irrespective of this regulation, the Cabinet in December 2016, agreed to undertake this for all areas of the borough whether or not an NDP or NDO has been adopted.

Overview of Neighbourhood Planning at LBTH

- 4.12. The determination of applications to designate Neighbourhood Areas and Neighbourhood Forums are decisions exercised by the Mayor of Tower Hamlets. Such applications are required by the Council to be submitted using the Council’s neighbourhood planning application forms.
- 4.13. The Council has published guidance to assist prospective Neighbourhood Forums to understand what is involved in becoming a Forum and designating an area and the criteria the Council use to make decisions. This guidance advises prospective Forums to liaise with officers prior to applications being submitted. This allows those proposing to make neighbourhood planning obligations to meet relevant legislative requirements.

5. NEIGHBOURHOOD DEVELOPMENT PLANS: RELEVANT LEGISLATION AND GUIDANCE

- 5.1. This section outlines the relevant legislative framework and guidance as they relate to the submission and consideration of applications for neighbourhood planning forums.
- 5.2. The Council has a statutory duty to determine applications to designate Neighbourhood Forums in accordance with the relevant legislation: TCPA 1990 Section 61F and the Neighbourhood Planning (General) Regulations 2012.
- 5.3. Regulation 8 of the 2012 Regulations specifies the criteria that:

Where an organisation or body submits a neighbourhood forum application to the local planning authority it must include—

- (a) the name of the proposed neighbourhood forum;*
- (b) a copy of the written constitution of the proposed neighbourhood forum;*
- (c) the name of the neighbourhood area to which the application relates and a map which identifies the area;*
- (d) the contact details of at least one member of the proposed neighbourhood forum to be made public under regulations 9 and 10; and*

- (e) *a statement which explains how the proposed neighbourhood forum meets the conditions contained in section 61F(5) of the 1990 Act.*
- 5.4. Upon receipt of an application, it is validated in accordance with the above.
- 5.5. In accordance with Regulation 9 of the Neighbourhood Planning (General) Regulations 2012, the authority must publish the following on their website and in such a manner as to bring the application to the attention of people who live, work or carry on business in the area to which the application relates:
 - (a) *a copy of the application;*
 - (b) *a statement that if a designation is made no other organisation or body may be designated for that neighbourhood area until that designation expires or is withdrawn;*
 - (c) *details of how to make representations; and*
 - (d) *the date by which those representations must be received, being not less than 6 weeks from the date on which the application is first publicised.*
- 5.6. Section 61F of the TCPA (1990) specifies that an LPA may designate a relevant body as a Neighbourhood Forum if the authority is satisfied that it meets conditions identified in 61F(5) relating to purpose, membership and a constitution. The conditions are as follows:
 - a) *It [the Forum] is established for the express purpose of promoting or improving the social, economic and environmental wellbeing of an area that consists of or includes the neighbourhood area concerned (whether or not it is also established for the express purposes of promoting the carrying on of trades, professions or other businesses in such an area).*
 - b) *It [the Forum] has a membership is open to:*
 - (i) *Individuals who work in the neighbourhood area concerned*
 - (ii) *Individuals who work there (whether for business carried out there or otherwise)*
 - (iii) *Individuals who are elected members of a county council, district council or London borough council any of whose area falls within the neighbourhood area concerned.*
 - c) *It [the Forum] membership includes a minimum of 21 individuals each of whom –*
 - (i) *Lives in the neighbourhood area concerned*
 - (ii) *Works there (whether for business carried on there or otherwise), or*
 - (iii) *Is an elected member of a county council, district council or London Borough Council any of whose area falls within the neighbourhood area concerned.*
 - d) *It [the Forum] has a written constitution*

e) *Such other conditions as may be prescribed.*

5.7. Section 61F(6) states a local planning authority may also designate an organisation or body as a Neighbourhood Forum if they are satisfied that the organisation or body meets prescribed conditions. The Secretary of State has not prescribed any conditions in the 2012 Regulations.

5.8. Section 61F(7) of the Act also requires that a LPA

- (a) *must in determining under subsection (5) whether to designate an organisation or body as a neighbourhood forum for a neighbourhood area, having regard to the desirability of designating an organisation or body –*
 - (i) *which has secured (or taken reasonable steps to attempt to secure) that its membership includes at least one individual falling within each of the sub-paragraphs (i) to (iii) of subsection (5)(b).*
 - (ii) *whose membership is drawn from different places in the neighbourhood area concerned and from different sections of the community in that area*
 - (iii) *whose purpose reflects (in general terms) the character of that area*
- (b) *may designate only one organisation or body as neighbourhood forum for each neighbourhood area*
- (c) *may designate an organisation or body as a neighbourhood forum only if the organisation or body has made an application to be designated, and*
- (d) *must give reasons to an organisation or body applying to be designated as a neighbourhood forum where the authority refuse the applications.*

5.9. The Forum application is assessed against the above legislative criteria and public consultation responses. The following section assesses the application against the above criteria.

5.10. Once designated, section 61F(8) states that the Forum designation expires after 5 years to the day of designation. In addition, section 61F(9) states that:

A local planning authority may withdraw an organisation or body's designation as a neighbourhood forum if they consider that the organisation or body is no longer meeting—

- (a) *the conditions by reference to which it was designated, or*
- (b) *any other criteria to which the authority were required to have regard in making the designation;*

and, where an organisation or body's designation is withdrawn, the authority must give reasons to the organisation or body.

6. LIMEHOUSE COMMUNITY FORUM APPLICATION

6.1. This section provides detailed assessment of the Limehouse Community Forum application, in relation to the criteria outlined above.

Making the Application

6.2. An application was received from the Limehouse Community Forum to renew their designation as a neighbourhood forum on 24 November 2020. The application contained:

- The name of the Neighbourhood Forum
- A copy of the written constitution of the Neighbourhood Forum
- The name of the Neighbourhood Area to which the application relates and a map which identifies the area
- The contact details of at least one member of the Neighbourhood Forum which could be made public
- A statement which explains how the Neighbourhood Forum meets the conditions contained in 61F(5) of the 1990 Act (provided through responses to the questions on the application form)

6.3. On 25 November 2020, it was confirmed that the submission had been received and that the required details were included.

6.4. Under Regulation 11 of the 2012 Regulations, the Council may decline to consider an application for an area where there is an existing neighbourhood forum designation. At the time the application was submitted, the forum designation in the Limehouse area was still in place; however, on 1 December 2020, that designation expired, and there is now no designated neighbourhood planning forum for this area. It is therefore considered acceptable for the Council to consider the application.

Consulting on the Application

6.5. In accordance with regulation 9 of 2012 Regulations, public consultation on the Limehouse Community Forum application needed to be carried out for at least six weeks. The consultation began on 3 December 2020 and ended on 27 January 2021. This was more than the required 6 weeks, in order to account for the holiday period which fell in the middle of the consultation, and to ensure that all interested parties had suitable opportunity to submit responses.

6.6. The consultation had been due to finish on 22 January 2021. However, after the consultation had begun, it emerged that there was a mistake on the application form. The form stated that the forum's application to be re-designated had the full support of Limehouse councillor James King. This was not accurate, and the Forum stated this text had been mistakenly copied over from an earlier draft. After discussion between officers, the councillor, and members of the neighbourhood forum, it was agreed that the sentence would

be removed from the application form and the consultation would be extended by five days (the amount of time the erroneous form had been available).

- 6.7. The Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2016 insert regulation 9A into the 2012 Regulations. This states that:
- (1) *Where a local planning authority receive a neighbourhood forum application which they do not decline to consider under regulation 11, the authority must determine the application by the date prescribed in paragraph (2)*
 - (2) *The date prescribed in this paragraph is:*
 - (a) *In a case where the neighbourhood area to which the application relates falls within the areas of two or more local planning authorities, the date which is the last day of the period of 20 weeks beginning with the day immediately following that on which the application is first publicised in accordance with regulation 9;*
 - (b) *In all other cases, the date which is the last day of the period of 13 weeks beginning with the day immediately following that on which the application is first publicised in accordance with regulation 9.*
- 6.8. Due to this requirement that the application be determined within 13 weeks of the consultation process beginning, and given the timescales of the Cabinet reporting process, it was necessary to begin the reporting cycle before the consultation process was completed. The DLT and CLT reports on this topic therefore provided a snapshot of consultation responses at the time of preparation of those reports. The MAB and CAB reports are accompanied by a consultation statement (appendix 5) setting out the methods used to publicise the consultation and the responses to the consultation.
- 6.9. To summarise, 38 responses were received to the consultation. Of these, seven were neutral responses from organisations stating 'no comment' or 'no objection'. Six were positive responses from individuals. Two responses, one from an individual and one from the SPLASH organisation that is the designated neighbourhood forum for the adjacent Poplar Neighbourhood Planning Area, raised concerns but did not explicitly object to the application. Twenty-three responses from individuals objected to the application. Two more responses from individuals – one objecting, and one concerned – were received on the same day that the consultation closed but after the given closing time of 5pm. These have been included in Annex 3 of the consultation statement.
- 6.10. The complaints raised by the negative and concerned responses are summarised in the appended consultation statement. The consultation statement also contains two annexes setting out the main text of all the representations. The officer was contacted by Cllr James King, who noted that some respondents had expressed concerns about their names being made public, and that some of the responses contained allegations of bullying. Due

to this, representations from individuals (whether positive or negative) have been presented anonymously.

- 6.11. Some consultation responses raised the issue of whether the neighbourhood forum had been funded by grants from the Council. The Council would like to make it clear that neighbourhood forums and neighbourhood planning activities are not funded by the Council. Grant funding is available to neighbourhood forums from the Ministry for Housing, Communities, and Local Government.

Determining the Application: Section 61F(5) considerations

- 6.12. *In accordance with section 61F(5)(a), is the Forum established for the express purpose of promoting or improving the social, economic and environmental wellbeing of the area?*
- 6.13. The Forum was initially established as a community safety organisation, but the current iteration of the forum is expressly concerned with social, economic and environmental wellbeing in the Limehouse area, as described in the application form. The forum is concerned with community safety, sustainable living, community cohesion, wellbeing, inclusivity, and access to open space. The Forum's constitution does not contain any clauses that explicitly set out that the Forum is established for these purposes, although this could potentially be inferred from clauses 2(a) and (b).
- 6.14. Responses to the consultation have questioned how committed the Forum is improving environmental wellbeing. One response stated "they are hugely overstating their environmental credentials", and this response and another claimed that the Forum's only environmental activity during their original designation has been to set up a gardening club (known as LIMEgreen). The Forum claims that LIMEgreen aims to "address the growing issues of climate change, street use, recycling, air quality and greening".
- 6.15. Another consultation response claimed that the Forum's primary activities are social events, and that while these events "are popular and serve a valuable function for a section of the Limehouse community", the Forum otherwise does not promote the economic and environmental wellbeing of the area.
- 6.16. *In accordance with section 61F(5)(b), is Forum membership open to everyone who lives, works (for business carried out there or otherwise) or represents the Area as an elected member?*
- 6.17. The current version of the Limehouse Community Forum Constitution states in clause 1 that membership is open to those who live, work, carry out business, or are an elected representative of the area, as well as voluntary and community groups from the area.
- 6.18. Consultation responses have raised the issue that residents of Limehouse are not automatically made members of the Forum, have to apply for

membership, and have to have their membership accepted by the executive of the Forum. Some of this is not necessarily unusual for a neighbourhood forum – potential forums need to show that they have at least 21 members, so there has to be some process of actively ‘opting-in’ to being a member to demonstrate that this requirement has been met. It is also not unusual to have some mechanism for formally removing or suspending members that behave in a way that is contrary to a forum’s stated objectives or would otherwise cast a poor light on a forum (for example, members acting illegally).

- 6.19. However, given the content of a number of the consultation responses, it is clear that there is concern among the community that this power to accept or reject membership may be abused, which would lead to the Forum essentially not being open to all potential members. One response notes that “the Chair is entitled to appoint as many Vice-chairs as he wishes, enabling him to secure a majority of the Executives votes, allowing him to refuse membership to those whose opinions he does not approve”.
- 6.20. *In accordance with 61F(5)(c), does the Forum have a membership which includes a minimum of 21 people, each of whom lives, works or represents the Area as an elected member?*
- 6.21. The application form contains details of 21 members who live or work in the area, including local residents, business operators, and representatives from community organisations.
- 6.22. However, see paragraph 6.40 below for concerns that Limehouse Community Forum members may not actually be the same as Limehouse Neighbourhood Forum members, and that the application may be demonstrating enthusiasm for a wider community organisation rather than a specific commitment towards forming a neighbourhood planning forum.
- 6.23. *In accordance with 61F(5)(d), does the Forum have a written constitution?*
- 6.24. The Forum has a written constitution. There are no requirements in the legislation for the constitution to contain particular items, other than for membership to be open to those who live, work, carry out business, or are elected representatives of the area, and concerns around this requirement are discussed in paragraphs 6.16-6.18 above.
- 6.25. Responses to the consultation have raised significant concerns that the rewrite of the constitution undertaken in 2019 was not handled well and has led to significant resentment among now former members of the Forum. It has been noted that during this process the forum incorrectly claimed that the Council had decreed their existing constitution ‘unlawful’ to justify the need to develop a new one – the Forum was contacted over this issue at the time and was asked to remove that claim from their website.
- 6.26. While these representations are concerning, the legislation at section 61F(5)(d) only provides for a consideration of whether the forum has a written constitution, not the process by which it was written or its contents (beyond

membership being open to all the relevant categories of people). However, concerns relating to this process will be discussed below in the paragraphs relating to section 61F(7).

- 6.27. *In accordance with 61F(5)(e), does the Forum meet other conditions as may be prescribed?*
- 6.28. No other legislative or regulatory conditions have been prescribed and as such there are no matters for consideration as part of this application.
- 6.29. *In accordance with 61F(6) does the Forum meet other prescribed conditions?*
- 6.30. The Secretary of State has not prescribed any conditions in the 2012 Regulations.

Determining the Application: Section 61F(7) considerations

- 6.31. *In accordance with 61F(7)(a)(i) does the Forum secure or take reasonable attempts to secure at least one individual who lives in the area, works in the area or is an elected member of the representing the area?*
- 6.32. The Forum has secured membership of at least one individual who lives in the area or works in the area. The forum has not secured the membership of any elected representatives of the area, but the application form notes that the forum does keep up regular communication with the one elected Tower Hamlets councillor for the Limehouse ward, Councillor James King. As noted in paragraph 6.6, the application form for redesignation initially stated that the forum had the full support of Councillor King, but this was found to be inaccurate, and was corrected on an updated version of the application form.
- 6.33. *In accordance with 61F(7)(a)(ii), does the Forum's membership draw from different places in the area and different sections of the community?*
- 6.34. The application form claims that the Forum's membership includes representatives from across the geographical area, and consists of residents, local businesses, and other organisations including the Royal Foundation of St Katherine's, the Canal and River trust, the local primary school, and the Limehouse Basin Berth Holders Association.
- 6.35. Consultation responses have raised a number of concerns in relation to this element. A number of respondents believe that the Forum is not representative of the area, and responses have included claims that the Forum primarily represents white British people in an area which has diverse demographics, and that the local Bangladeshi community is under-represented. This is difficult to quantify, and no demographic data has been provided by the Forum. The representation from SPLASH expressed concern at a lack of members from the estates at the east of the neighbourhood planning area, close to the boundary with the Poplar neighbourhood planning area. Another response claimed the Forum "has failed to recognise the concerns of east Limehouse residents in particular, where recent planning

applications have impacted their lives”. Another said that it is “disappointing that the only faith group to be represented is the C of E when we are a very diverse community”.

- 6.36. Some responses stated that the Forum is only concerned with the area south of Commercial Road, and has ignored communities north of Commercial Road. However, it should be noted that the neighbourhood planning area as designated stops at Commercial Road – the communities to the north are not part of the Limehouse neighbourhood planning area. While wider community engagement is always welcome, there is no requirement for the Forum to engage with communities outside of its designated area on neighbourhood planning issues.
- 6.37. *In accordance with 61F(7)(a)(iii), does the Forum’s purpose reflect the character of the Area?*
- 6.38. The objectives of the Forum are stated in clause 2 of the constitution, and include furthering the interests of its members and of Limehouse; maintaining and improving Limehouse as a place in which to live, work or visit; to represent the views of the Forum to statutory bodies and others; to hold regular meetings to discuss matters of interest to members; and to host events to promote community cohesion. These objectives are not very detailed, but the application form adds that the forum is concerned with community safety, sustainable living, community cohesion, wellbeing, inclusivity, and access to open space, and this could be considered to reflect the character of this densely populated local area.
- 6.39. On the other hand, some consultation responses have noted that residents in the east of Limehouse were disappointed that the Forum did not oppose particular planning applications in that area. While it is not necessary for a neighbourhood forum to respond to planning applications in the area, these consultation responses suggest that there are people in particular parts of the neighbourhood planning area who do not believe the Forum is helping to maintain the character of the area.
- 6.40. Similarly, many consultation responses referred to the fact that a neighbourhood plan for Limehouse has not yet been developed – after five years of the previous designation, a plan had not reached even the first stage of formal consultation. Other responses provide some comments on why this may have been the case. One response states that the Chair of the Limehouse Community Forum has only ever attended one meeting of the neighbourhood planning sub-committee. Another states that the neighbourhood planning sub-committee has received no support from the Limehouse Community Forum, only has six regular members at meetings, and that none of the 21 members listed in the application form apart from the Chair have attended meetings of this sub-committee.
- 6.41. Another representation provided the text of an email from the Chair of the Limehouse Community Forum stating “The LCF should separate any and all planning responsibilities it has as the NPF, and function independently from

the Forum". It was the Limehouse Community Forum that applied to be designated as a neighbourhood forum in 2015, and it is this organisation that is applying to be designated again now. It is very concerning if the neighbourhood planning responsibilities of the designated forum have then been 'sub-contracted' to another quasi-independent group that has not been through the assessment process and retains an uncertain relationship with the 'main' forum organisation who have been officially designated.

- 6.42. One of the primary purposes of a neighbourhood forum is to develop a neighbourhood plan that reflects the character of the area and the desires of its community. The legislation is clearly aimed primarily at situations where a forum is being designated for the first time, and therefore does not address the question of how a lack of progress on the development of a neighbourhood plan should be assessed. However, it could be argued that a failure to progress a neighbourhood plan represents a failure on the part of the Forum to successfully reflect the character of the area.
- 6.43. *In accordance with 61F(7)(b) will designation result in only one organisation or body as Neighbourhood Forum for each Neighbourhood Area?*
- 6.44. Yes – since the Forum's previous designation expired on 1 December 2020, there is currently no designated neighbourhood forum for the Limehouse Neighbourhood Planning Area. This proposal will therefore result in only one neighbourhood forum being designated for the area.
- 6.45. *In accordance with 61F(7)(c) will designation of an organisation or body as a Neighbourhood Forum only occur where an organisation or body has made an application to be designated?*
- 6.46. The Forum made an application for designation on 24 November 2020.
- 6.47. *In accordance with 61F(7)(d) will reasons be given to an organisation or body applying to be designated as a Neighbourhood Forum where the authority refuse the applications?*
- 6.48. If Cabinet agrees with the recommendation of this report to refuse the neighbourhood forum application, a statement of reasons will be sent to the applicant and posted on the Council's website. A draft statement of refusal is attached to this report as Appendix 6.

Conclusions

- 6.49. There are significant concerns about whether this application meets the requirements of the TCPA 1990 relating to the designation of neighbourhood planning forums. These concerns relate to the following sections of the legislation:
- Section 61F(5)

- (a) Concern that the forum is committed to improving the social wellbeing of the neighbourhood planning area, but has shown less commitment to economic and environmental wellbeing
- (b) Concern that the forum is not fully open to all eligible members and that procedures for accepting new members are opaque
- (c) Some concern as to whether the neighbourhood planning function of the Forum has 21 members, if it held at arm's length from the main application body
- Section 61F(7)
 - (a)(ii) Concern over whether the Forum membership is suitably drawn from different places in the area and different sections of the community
 - (a)(iii) Concern over whether the Forum suitably reflects the character of the area as a neighbourhood forum, given the failure to develop a neighbourhood plan over the previous five year designation, and the numerous concerns raised by consultation responses as to the process of developing the neighbourhood plan

6.50. These concerns have been raised in the negative responses to the consultation. A clear majority of the consultation responses received explicitly objected or raised significant concerns about the application, and the number of objectors would be enough to form their own potential neighbourhood forum for the area if so desired. Many of these negative responses make very concerning claims about the governance of the forum, how well it represents different areas of the community, and how the neighbourhood planning element of the organisation is held at arm's length and given limited support by the parent body.

6.51. It is not the purpose of the consultation to act as a plebiscite on a particular organisation, and given that only a small amount of the overall population of Limehouse is engaged in this issue on either side, it is impossible to say whether one side or another has 'majority support'. It is also not the role of the planning officer to investigate every claim made on both sides about the past actions of the forum, in order to discern 'the truth'. But what is clear is that there appears to be a lack of broad community consensus on the representativeness and effectiveness of the Limehouse Community Forum as a neighbourhood forum. In these circumstances, designating the proposed forum may have a negative impact on community cohesion in the area.

6.52. It is also clear that the Limehouse Community Forum has not developed a neighbourhood plan during its previous five year designation, even as far as the first formal stage of consultation. Given this, and the concerns raised about the governance of the neighbourhood planning arm of the forum, it would also be undesirable to redesignate the neighbourhood planning forum when there are no clear signs that any further progress on a neighbourhood plan is likely to be made.

- 6.53. On this basis, the recommendation is that the application to designate the Limehouse Community Forum as the neighbourhood planning forum for the Limehouse Neighbourhood Planning Area should be refused.

7. EQUALITIES IMPLICATIONS

- 7.1. Officers have used the Council's Equality Impact Assessment Screening tool to consider impacts on people with the protected characteristics outlined in the Equalities Act 2010 (Appendix 4). It is considered that the proposals in this report do not have any adverse effects on people who share the protected characteristics and no further action is required at this stage.

8. OTHER STATUTORY IMPLICATIONS

- 8.1. 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.
- 8.2. Best Value Implications: During the determination of the submission the Council has worked with the Spitalfields Neighbourhood Forum where appropriate, and in line with our neighbourhood planning guidance, having regard to economy, efficiency, and effectiveness, and in conformity with the statutory requirements as detailed in the relevant legislation.
- 8.3. Consultations: See paragraphs 6.5-6.10 above.
- 8.4. Other implications: determining neighbourhood forum applications does not have any discernible implications on environmental issues, risk management, crime reduction, or safeguarding.

9. COMMENTS OF THE CHIEF FINANCE OFFICER

- 9.1 There are no material financial implications emanating from this report which seeks support for the re-designation of the Limehouse Community Forum as the designated neighbourhood forum for the Limehouse Neighbourhood Planning Area as it meets the conditions and provisions within section 61F of the TCPA 1990 and the 2012 Regulations
- 9.2 Costs associated with the consultation process and assessment of the application amount to £221 for a public notice and staff time. These funds will be taken from the Plan Making team budget.
- 9.3 There is no Parish Council in place for the Limehouse area. As a result, the CIL regulations 2010 allow the Council to retain any CIL income collected from this area but it must reinvest 25% of this income back into the local community. Should the application be accepted then this will need to be considered when using this CIL funding.

10. COMMENTS OF LEGAL SERVICES

10.1. This report requests Cabinet to:

1. Refuse the application for redesignation of the Limehouse Community Forum as the designated neighbourhood forum for the Limehouse Neighbourhood Planning Area and
2. Note the specific equalities considerations as set out in Paragraph 7.1 and Appendix 4 of this report as it applies to the proposed measures.

10.2. Pursuant to section 9D of the Local Government Act 2000 all functions of an authority are executive functions unless they are specified as not in either the 2000 Act or the Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (as amended). The decision on designating a Neighbourhood Forum is not a specified function and is therefore a decision for the Executive. The Executive is also authorised to consider the proposed recommendations in this report as they comprise a 'Key Decision' as defined in Section 3 of the Council's Constitution. Paragraph 6 of Section 3 of the Constitution defines 'Key Decision' as an executive decision which is likely to be significant in terms of its effects on communities living or working in an area comprising two or more wards or electoral divisions. As stated above in this report, if adopted the Limehouse Community Forum is likely to have a significant effect on communities living or working within the Limehouse Neighbourhood Planning Area given that the proposed Neighbourhood Forum was established for the express purpose of and include furthering the interests of its members and of Limehouse; maintaining and improving Limehouse as a place in which to live, work or visit; to represent the views of the Forum to statutory bodies and others; to hold regular meetings to discuss matters of interest to members; and to host events to promote community cohesion. The application form adds that the forum is concerned with

community safety, sustainable living, community cohesion, wellbeing, inclusivity, and access to open space.

- 10.3. The legislative framework for the designation of neighbourhood forums by the Council and their operative measures are set out in detail in this report and are contained in the Town and County Planning Act 1990 (as amended) ('TCPA 1990') and the Neighbourhood Planning (General) Regulations 2012(as amended) ('the 2012 Regulations'). The Government's Planning Practice Guidance ("PPG") on Neighbourhood Planning (Ref ID: 41-021-20140306) also provides guidance on the determination of such applications, which states that the role of the Local Planning Authority (LPA) is to take decisions at key stages in the neighbourhood planning process.
- 10.4. Section 61(F)(5) to (7) of the TCPA 1990 sets out the conditions that must be satisfied before a local authority may designate an organisation or body as a neighbourhood forum. This report provides a comprehensive assessment of the Limehouse Community Forum's application for re-designation as a neighbourhood forum..
- 10.5. Regulation 9 of the 2012 Regulations requires the Council to publicise valid neighbourhood forum applications in the areas where they are proposed to operate and invite public representations for a minimum 6 week period.
- 10.6. The 2012 Regulations were amended by the Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2016. Under regulation 9A(2)(b) of the amended 2012 Regulations, the Council must make a decision on applications for neighbourhood forum designations within 13 weeks of starting a consultation on the application.
- 10.7. The Equality impacts of the proposed measure to redesignate the Limehouse Community Forum is set out in paragraph 7.1 and Appendix 4 of this report. It is considered that the proposed recommendations do not have any adverse effects on people with protected characteristics and no further action is required at this stage. Members must have regard to these equality impacts when reaching a decision.
- 10.8. The report notes that twenty-three negative public responses have been received as part of the ongoing public consultation on the re-designation of the Limehouse Community Forum. These include:
- the effectiveness of the forum over the past five years in progressing a neighbourhood plan;
 - the process of developing the forum's constitution; and
 - the forum has not been a welcoming and inclusive organisation

Under regulation 8 of the 2012 Regulations, representations can be made(among other limited matters) on the proposed constitution and on the statement explaining how the proposed neighbourhood forum meets the conditions in section 61(F)(5) of the TCPA 1990.

The representations that have been received have led officers to conclude that the conditions in s61(F)(5), particularly s61(F)(5)(a) have not been satisfied. Officers have further concluded that s61(F)(7)(a)(iii), namely that the organisation's purpose reflects the character of the area has also not been adequately satisfied. The failure of these statutory requirements has therefore led officers to recommend that the CAB refuses the application for the re-designation of the Limehouse Community Forum as a neighbourhood forum. The Statement of Refusal at Appendix 6 of this report sets out the Council's reasons for recommending refusal of this proposed re-designation.

Linked Reports, Appendices and Background Documents

Linked Report

- None

Appendices

- Appendix 1: Limehouse Community Forum Application Form
- Appendix 2: Limehouse Neighbourhood Area Map
- Appendix 3: Limehouse Community Forum Constitution
- Appendix 4: Equalities Impact Assessment Screening
- Appendix 5: Consultation Statement
- Appendix 6: Draft Statement of Refusal

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

- NONE

Officer contact details for documents:

Steven Heywood

steven.heywood@towerhamlets.gov.uk

020 7364 4474

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Neighbourhood Planning Forum Application Form



This form should be completed electronically.

Important Information:

This application form should be completed using the information provided in the Tower Hamlets [Neighbourhood Planning Guidance Note Stage 1](#).

In order to increase the speed and ease of decision making, and to make the process more manageable for prospective Forums, the Council strongly suggests that this application should be completed and submitted after a Neighbourhood Area application. Once the Neighbourhood Area has been formally designated, a Neighbourhood Forum application can be submitted.

The Council wants to ensure that your applications are approved in a smooth and timely manner. In order to support this process, we encourage interested groups to meet and begin discussions with the Plan Making Team, well in advance of submitting an application.

This meeting will provide advice and guidance on key considerations, which will help to ensure that the Area and Forum, as applied for can be designated without delays.

Email neighbourhoodplanning@towerhamlets.gov.uk or call 020 7364 5009 to set up the meeting.

Contact information

Forum name

LIMEHOUSE COMMUNITY FORUM – (LCF)

Contact details of the Forum (complete as relevant)

Email address	mark.slankard@limehouse.info
Website address	https://www.limehouse.info
Facebook page	https://www.facebook.com/groups/limehousematters
Twitter account	@LimehouseMatter
Other	Click here to enter text.

Neighbourhood Planning Forum application information

Public information

This section needs to be completed to ensure the Council has the information needed to determine whether the Forum meets the **four conditions** stated in the Localism Act. The four conditions are numbered below.

1	The Forum is established to promote or improve the social, economic and environmental well-being of its neighbourhood.
1a. How will the Forum seek to promote or improve the Neighbourhood Planning Area in terms of its social, economic and environmental well-being?	
Social well-being	<p>The LCF was established in 2006, initially concerned with community safety. Since then its primary purpose has evolved to meet the objectives of this Condition. Membership is open to all residents, people who work in Limehouse, business representatives and elected Officials. We will continue to focus our attention on matters concerning community safety, sustainable living, community cohesion, wellbeing and inclusivity. Even before the Localism Act, a track record had been established in organising the annual Limehouse Festival ('LIMEfest'), re-opening the Limehouse Youth Centre and liaising with other groups, such as LBTH, Metropolitan Police, GLA, the GP Limehouse Practice and the Canal and River Trust. At the start of the Covid19 pandemic in 2020, we partnered with and supported a local entrepreneur to manufacture and distribute protective faceshields for the benefit of our community. This exercise ('LIMEshield') provided over 2000 faceshields to residents, carehomes, social landlords, volunteers and NHS workers, as well as the ICU at the Royal London Hospital. The exercise provided an opportunity for residents to engage in positive volunteer activity during the lockdown period, supporting frontline workers and the vulnerable in Limehouse and nearby wards. We also supported and mentored a new local volunteer group ('Limehouse Aid'), which was formed by young people looking to do positive good in Limehouse and Shadwell wards during the lockdown and beyond, such as a helpline, food and medicine deliveries for the vulnerable and assisting with the establishment of a foodbank.</p>
Economic well-being	<p>Limehouse is primarily a residential area. Notwithstanding this, 82% of residents are of working age (2nd in LBTH) and 73% (1st in LBTH) are in employment. Accordingly most economic activity occurs outside the ward. Reflecting this, LCF will support and promote local business / employment which reflects these characteristics, meets the needs of residents and is beneficial to the community. To this end LCF will ensure that planning, sustainable design, functionality and maintenance of public</p>
Environmental well-being	<p>LCF will continue to seek to identify new opportunities for environmental improvement and will establish policies and standards which will improve the sustainability and environmental quality of public spaces, open access to private land and streetscapes. We intend to nurture the open access enjoyed by residents by building upon our existing relationships with Canal and River</p>

	Trust (Limehouse Basin), Friends of Ropemakers Fields, GLA., as well as LBTH. Work is soon to commence on clearing and replanting parts of our park,(Ropemakers Field) working alongside children from the local primary school. LIMEgreen has been established not only for gardening projects but to address the growing issues of climate change, street use, recycling, air quality and greening.
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1b. How will the Forum embed the Council’s guidance and aspirations within the Community Plan, Single Equality Framework, Core Strategy, and Managing Development Document into their activities?

Community Plan and Single Equality Framework	<p>LCF has reviewed the policy objectives encompassed in the Community Plan. We see no inconsistency between these and LCF objectives.</p> <p>The LCF constitution is that our Forum membership is inclusive and open to all people, groups and organisations participating in the life of the neighbourhood. The decision-making processes set out in our constitution ensure that the Forum is accountable to its members, which includes all potential stakeholders in the neighbourhood area.</p> <p>We accept that an integrated approach across many service providers are needed (e.g. Youth Centre, Medical Centre, Met Police) although it should be acknowledged that LCF will have limited opportunity to have a major impact on housing, education, jobs or elderly care (n.b. only 4% of residents are 65+). Insofar as our Neighbourhood Plan can support the Plan, we are developing relevant proposals and policies for the Limehouse Ward.</p>
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Core Strategy & Managing Development Document	<p>We accept that the Neighbourhood Plan which LCF is developing should be complementary to this document. Accordingly we have developed policies relating to the design, sustainability, location and environmental impact of any development planned for the ward. The membership of LCF considers that there is limited scope for large scale development and this is reflected in the plan as local adoption of the core policy document occurs. We note that population density in Limehouse ward exceeds the LBTH average by 15.4% already.</p>
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1c. How will the Forum envisage engaging with other local forums and groups? (for example, has a Memorandum of Understanding, which could provide the basis for joint working agreements with other local forums/groups been explored?)

The LCF frequently connects with other local groups, forming dynamic collaborative relationships to share views and resources as needed. Such collaborations promote community unity and enhance diversity of opinion and ethos. LCF offers such groups / organisations associate membership, giving leadership teams the opportunity to hear and better understand wider neighbouring needs and objectives. Examples of our relationships include Mile End Residents Association (MERA) and Burton’s Wharf Residents Association to the north of Limehouse, Royal Foundation of St Katherine (RFSK) to the west of Limehouse, Isle of Dogs NPF and Neighbours in Poplar (NIP) to the east of Limehouse and the Bertholders Association (Limehouse Basin) at the centre of the ward. Such relationships have come to the fore during the 2020 pandemic: LCF engaged with the residents of Limehouse to donate crockery to support food deliveries to the elderly being carried out by NIP; worked with RFSK, Limehouse Aid and Bikeworks to establish a food bank and distribution network for the ward’s vulnerable and needy families and helped promote local sewing charity Stitches In Time’s production of facemasks. In the past year we have also been pleased to share information and resources with

Poplar NPF as it prepared to start work on its own neighbourhood plan.

2

The Forum's membership is open to everyone who lives in, works in or represents the area as an elected member.

2a. How have the Forum taken steps to promote the opportunity to be involved in the Forum and engage with local people prior to submitting this application? This may include evidence of discussions, meetings and consultations.

The LCF has met at least tri-monthly for the past thirteen years and has interacted with local people in many diverse ways; the meetings have been minuted /recorded, and minutes are available to the public via a dedicated website page. The LCF hosts and sponsors hustings for local and General Elections with attendances in excess of 250 people. The LCF advertised, hosted and held an engagement event for the green space at Branch Road, soliciting opinion as to the future of the site. The annual LIMEFest summer festival is well publicised/attended; the most recent, in 2019, saw over 3000 people during the course of the day. LCF's stands at these events give us the opportunity to engage with local people, make them aware of our activities, discuss and get feedback about the production of our Neighbourhood Plan and offer them involvement / membership. Following residents' concerns around safety, the LCF organised a safety meeting, attended by the local borough Police Commander, local MP and the Mayor of LBTH, along with over 400 residents. Our constitution commits us to consultation and discussion with people and organisations within the neighbourhood area whether they are members of the LCF or not. Such consultations have included LBTH working alongside the pupils at Cyril Jackson School to design the refit of the childrens' play area at our park, Ropemakers Field. We also have an excellent working relationship with our elected Councillor with whom we have regular communications about a variety of local topics.

2020 has obviously been more challenging; we replaced LIMEFest with a childrens' art competition and a Blooming Limehouse photography challenge, posters /banners/ social media announcements for which provided details of our website, from which we could offer further engagement. We have also been producing a newsletter in lieu of meetings, which is emailed to members but also freely available via our website. Lastly we have social media presence where people discuss local concerns / interests / events. These groups do not require LCF membership but do allow us another platform through which we can engage with local people and keep them informed.

Our membership is drawn from residents (both social and privately-owned housing), local businesses and other associated bodies as diverse as Royal Foundation of St Katherine's, Canal and River Trust, the local primary school, and Limehouse Basin Berth Holders Association. The LCF intends to strengthen these bonds and forge new ones with other groups as they develop. Many in the groups, as well as individuals have been involved in the development of our community plan.

3

The Forum's membership includes a minimum of 21 people, each of whom lives in, works in or represents the area as an elected member.

3b. Does it have a membership of at least 21 people?

Yes No

3b. How have the Forum secured (or taken reasonable steps to attempt to secure) at least one person from those who live in, work in or represent the area as an elected member in its membership? This may include evidence of discussions, meetings and consultations.

As outlined above we continue to be diligent in our attempts to include everyone as members and to keep them informed about plans for the Neighbourhood Area and the creation of a Neighbourhood Plan. With due governance we use data tools to ensure we can monitor our inclusivity going forward.

Since inception in 2006 LCF has met regularly. Our focus during that time has not been exclusively Planning related, and so we have extended an 'open door' policy of allowing local groups and elected representatives to address the LCF on a wide range of issues and opportunities affecting the neighbourhood. For example, the introduction of the Youth Ward Panel, to promote inclusive youth activity within the ward and the Police Ward Panel, to raise and promote residents' safety and concerns and to monitor ASB within the ward.

A regular newsletter, LIIMELight has been established for 2020, to inform members and residents about LCF activities and other local engagements.

Do members come from different places within the neighbourhood and do they reflect the diversity of the people within the neighbourhood? Please provide the name, postcode and interests & relevant background of each member.

#	Name	Postcode	Interests & relevant background
1	Mark Slankard	E14 8HH	Chair of LCF and owner of Urban Bars
2	Sue Stollery	E14 7HR	Resident and Chair of Governors, Cyril Jackson Primary School
3	David Garside	E14 8DP	Chair of Police Ward Panel and local resident
4	Helen Kenney	E14 8AA	Barley Mow estate
5	Richard Bray	E14 7HR	Rector St Anne's Church; Rep from Newell Street
6	Tof Ali	E14 8BS	Limehouse Community Initiative
7	Mark Kennedy	E14 7JG	Owner Bronze Age, Limehouse gallery
8	Eric Sorensen	E14 8AU	Property Owner Milligan Street
9	Richard Roberts	E14 8AA	Liaison Friends of Ropemakers
10	Gary Holden	E14 8BZ	Founder LCF; Rep for Papermill Wharf
11	Hodo Dirir	E14 8BN	Headteacher Cyril Jackson School
12	Jud Hoff	E14 8DB	Rep for Ropemakers Fields
13	Dorinda Osterman	E14 8EG	LimeGreen and Limehouse Marina berth holder
14	Lesley Balding	E14 8AP	Resident rep Basin Approach
15	Roger Preece	E14 8DS	Master St Katherines Foundation
16	Michael Dormer	E14 8DP	Resident
17	Lady Deborah Owen	E14 8HP	Rep for Narrow Street
18	Simon Rouse	E14 7HP	Community Transport Operator

19	Philip Saunders	E14 7JX	Rep for Berglen Court / Medland House
20	Akash Gharu	E14 8EA	Resident rep for Goodhart Place
21	Thea Reynolds	E14 8BB	Resident rep for Dunbar Wharf

4 The Forum has a written constitution.

4a. Has the Forum completed and attached a written constitution?

Yes No

4b. Has the written constitution been developed in a correct and proper manner? (in accordance with Locality Guidance)

We believe the constitution has been developed in the correct fashion, not only incorporating the requirements for a Neighbourhood Planning Forum but also (because LCF existed prior to becoming an NP, and would hope to continue after completion of the NP) supporting the additional activities we carry out for/with our community and our neighbours. In particular the constitution emphasises that membership is open to all who live, work, or have a business in the NP area, as well as to elected local officials. It also sets out the basis for associate membership, without voting rights, for those who do not meet the membership criteria but with whom a relationship is mutually helpful. We also lay out a transparent structure which is designed to facilitate the work of the Forum and ensure good governance. Along with the constitution, we have developed a website and social media presence which gives us greater opportunity for engagement, and we use software which enables us to maintain our membership database in accordance with GDPR rules and to verify the validity of membership and voting processes.



Meeting Log: Please provide dates of your meetings with the Plan Making Team	Email correspondence to discuss submission process, July 2020 (various dates) Remote meeting to further discuss application, 22 nd July 2020 Email correspondence to finalise submission, November 2020 (various dates)
Applicant name	Mark Slankard – Chair – Limehouse Community Forum
Date	24 th November 2020

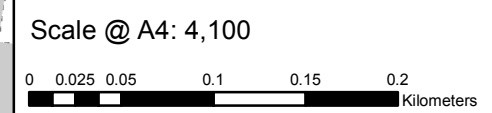
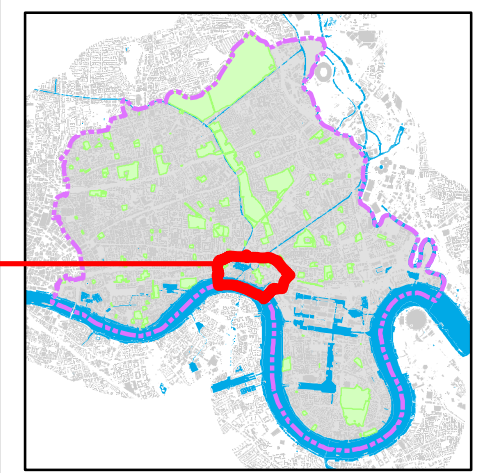
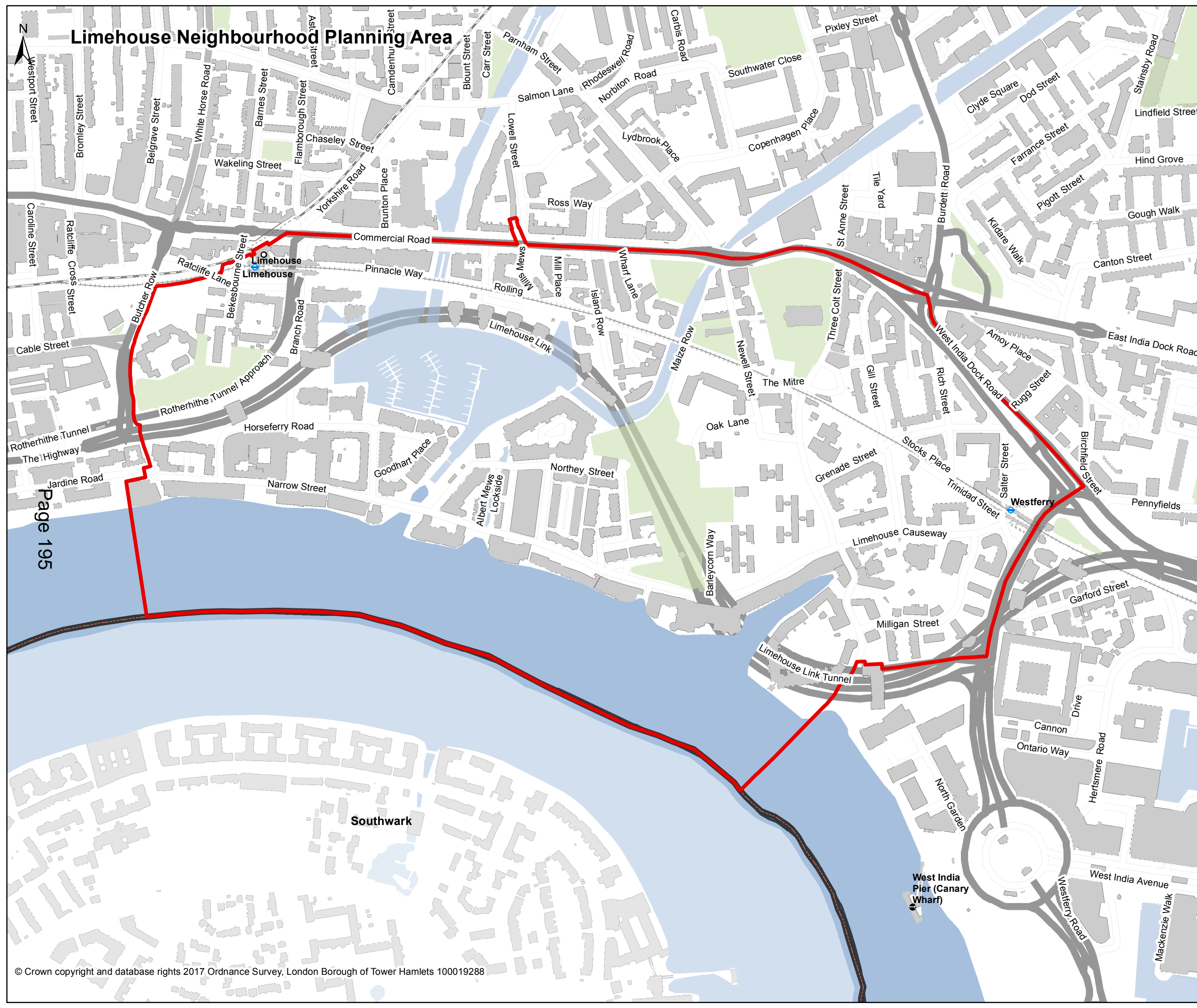
Please note: Forums will be required to inform the Council of any change to the original content and intentions detailed in its application form. Specifically, any change to the membership of the Forum and written constitution will require the Forum to immediately notify the Council of these changes, in writing to the neighbourhood planning email address.

Limehouse Neighbourhood Planning Area

Limehouse Neighbourhood Planning Area London Borough of Tower Hamlets

LEGEND

-  Neighbourhood Planning Area
-  Borough Boundary



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Limehouse Community Forum Constitution

1. Name, Coverage and Meanings

The name of the association shall be the "Limehouse Community Forum" (described below as the Forum or LCF). The LCF is composed of Associate Members, Members and Executive Members.

"Limehouse": means the Ward of Limehouse as of January 1st 2019, within the London Borough of Tower Hamlets, plus such additional area(s) as may be agreed by the members of the Executive from time to time.

"Constitution": means the rules of the Forum as set out herein and as amended from time to time in accordance with paragraph 10 below.

"Membership": means anyone who (a.) lives, (b.) works or (c.) carries out a business in, or is (d.) an elected London Borough Council member within the neighbourhood area and over the age of 18 years old. Membership is open to (e.) constituted voluntary and community groups which operate in the neighbourhood area. Voluntary and community groups may nominate up to two people in their membership registration but they may only exercise one voting right at meetings. Membership shall be drawn from different places in the neighbourhood area and different sections of the community.

a) Membership is open to the above and the Executive shall have the power to accept members.

b) The Executive may refuse membership or may terminate or suspend the membership of any member by resolution at an Executive meeting where it is considered membership would be detrimental to the objectives and activities of the LCF.

c) The LCF shall have a minimum of 21 (twenty-one) members. The Secretary shall maintain a register of members at all times and abide by all General Data Protection Regulations.

"Member": means a person who has applied for and is on the register of members. Members are voting members and additionally are able to comment on matters of principle to the LCF as deemed as such by the Chair or as otherwise stated in this constitution. Three Members acting together may petition to discuss matters at General Meetings. Members may take part in discussions.

"Associate Member": means any (a.) individual person, (b.) business or on occasion a (c.) group, connected to or carrying on activities in Limehouse who have registered with the LCF, and have not met the criteria of Membership. Associate Members will receive communications from the LCF and be invited to General Meetings and take part in discussions. Associate Members are not able to vote on matters of principle to the LCF, unless deemed as such by the Chair in consultation with the Executive, or as otherwise stated in the Constitution. The register of Associate Members shall be reviewed from time to time and dormant names shall be removed from the list.

"Executive Member": means a member who has been elected or appointed to act as an Officer, or a Leader of an authorised or adopted Working Party, or both.

“Executive”: means the collective of Executive Members.

“Working Party”: A (a.) group, (b.) panel or (c.) organisation which has been authorised, formed or adopted formally by the Executive to carry out functions as set down in specific Terms of Reference. Each Working Party shall have a Leader who shall report the activities of the Working Party to the Executive, as required by the Chair, and in due course to the Forum. Matters of organisation, funding, press releases and other concerns will be decided by agreement between the Working Party Leader and the Executive. Working Parties may be formed, enhanced and disbanded at the discretion of the Executive.

2. Objectives

The objectives of the Forum are:

- (a) To further the interests of its members collectively; those of Limehouse as a whole; protecting and promoting Limehouse and to use all reasonable and necessary actions to achieve this purpose.
- (b) To endeavour to maintain and improve Limehouse as a place in which to live, work or visit and to enjoy.
- (c) To represent the views of the Forum to Statutory bodies and others as needed or required.
- (d) To hold regular meetings for members of the Forum at which matters of interest to members and to Limehouse shall be discussed.
- (e) To host events within the Ward to promote community cohesion.

3. Constitution

3.1 The Forum is unincorporated, but may at the unanimous decision of the Executive form or take on another identity.

4. Officers

4.1 The Forum shall have the following Officers:

Chair
Vice-Chair(s)
Treasurer
Secretary
Digital Secretary

4.2 The position of Chair shall be decided by the Members annually, and shall be decided at the Annual General Meeting (AGM). Nominations for Chair and self nominations for Chair shall be submitted in writing to the Secretary 21 days prior to the AGM. The nominee must have served as a member of the Executive for at least one year prior to a nomination. At the election for Chair, the Executive shall determine the election procedure.

4.3 The position(s) of the Vice-Chair(s) shall be by nomination of the Chair. The number of Vice Chairs shall be decided by need, ability and the requirements of the Chair.

4.4 Appointment to the positions of Treasurer and Secretary, Digital Secretary and any other Officers deemed necessary by the Executive shall be agreed by a simple majority vote of Members at the AGM following the election or appointment of the Chair. Appointees are required to have specific skill sets which are role appropriate.

4.5 Officers shall normally hold their positions until the next AGM, unless they resign, are removed or are replaced by the decision of a 2/3rd majority of the Executive. No person may hold more than one LCF office at any time, without the expressed permission of the Chair.

4.6 In the event that an elected or appointed Officer raises a written motion of "No Confidence" in another Officer, and that motion is seconded by another elected or appointed Officer, the Chair will be required to poll the Executive on the matter of the removal of the nominated Officer. If a qualified majority of 2/3rd of the Executive returns a vote of "No Confidence" the nominated Officer shall be removed from Office immediately. The Chair in partnership with the Executive shall make an appointment to complete the term of Office as soon as is practicable. In the event the Chair is nominated for removal the process shall be administered by a Vice Chair Office holder.

4.7 The Chair may only nominate or appoint a person to an Office if they have been a Member or Associate Member for at least six months. If the appointee or nominee has not been a Member for more than six months the Chair must seek the expressed approval of the Executive. Mid-term vacancy of any office will be filled by appointment from the Executive.

4.8 The arrangements in paragraphs 4.2 to 4.7 (inclusive) shall be modified as deemed necessary in practice and as agreed from time to time by a majority vote of the Executive. The Executive shall be free to determine a democratic and transparent procedure for any election.

4.9 The role of the Chair shall be to call and set the agenda for meetings, in consultation with the Executive and Members; to help facilitate discussion amongst the group and where possible reach decisions by consensus, or otherwise requesting a show of hands or written vote; where appropriate and agreed, to represent the views of members publicly in the press and with the public or other bodies etc; to act in the best interests of the LCF, its members and Limehouse as a whole.

4.10 The role of Vice-Chair(s) shall be to support the Chair in the performance of the above and to act as Chair in the absence of the official incumbent.

4.11 The role of Treasurer shall be to keep safe and record all expenditures and incomes of the Forum and any active Working Parties, and to report to the Forum any deviations to standard accounting practices.

4.12 The role of the Secretary is to distribute the meeting agenda, take minutes and notes when necessary and inform the Executive of correspondence and messages received.

4.13 The role of the Digital Secretary is to maintain the website and database or records of

Members, Associate Members, and Statutory Bodies; monitor any social media and publish notices, notifications and announcements, which would be of relevance as directed by the Executive; at all times complying with the General Data Protections Regulations,

4.14 The role of all Members, the Chair, and the Executive shall be to identify the issues for discussion and bring them to the attention of the Forum.

4.15 The Officers working together shall be entitled to appoint, form and/or adopt Working Parties, setting out Terms of Reference, regulating and leadership. Leaders of Working Parties and the Working Parties themselves shall serve the Forum at the discretion of the Executive.

4.16 The address for the Forum shall be the address of the Secretary from time to time or as so decided by the majority of the Executive.

5. Fees

The Forum reserves the right to charge, or not charge, an annual fee to Associate Members and/or Members, to cover the costs of running the Forum and/or to provide funding for local initiatives. This topic, and the amount of any such fee, shall be considered year on year at the AGM. The Executive may, at its discretion, waive any individual fee if circumstances dictate; under no circumstances shall any fee be set at a level which restricts membership.

6. Annual General Meeting

6.1 An Annual General Meeting (AMG), normally to be held in January, shall be held at least once every year or as directed by the Officers, on such a day as the Officers may appoint. The business to be conducted at the AMG shall be as directed by the Officers, together with any resolution of which notice in writing to the Secretary has been given not less than 7 days before the meeting. Any other matters may, at the discretion of the Chair, be raised without notice, for the purposes of discussion only.

6.2 The Secretary shall give not less than 21 days written notice including by email, where possible, of the date, time and place of the Annual General Meeting.

7 Meetings

7.1 Meetings will be held at such intervals as the Officers decide and at such locations and times as the Officers decide. At least a week's prior notice of a meeting will normally be given to Members and Associate Members by email, unless pressing circumstances require a shorter period of notice. Where possible members will aim to take decisions on matters relating to the Forum by consensus but where this is not possible, decisions will be passed by a simple majority on a show of hands of Members who are entitled and authorised to vote in accordance with the constitution as their member status allows and who are present at the relevant meeting. Each such authorised Member will have one vote each. The Chair (or in their absence, the Vice-Chair or otherwise acting Chair as agreed by the Chair) may cast a vote in the event of a deadlock. However the Chair may choose not to vote and the matter can be left unresolved. Decisions may, at the discretion of the Chair and in accordance with direction, alternatively be taken by email or post by a simple majority of Members polled. In the event of a matter deemed of "great importance" to the community, at the

discretion of the Chair, upon consultation with the Executive, the Chair may choose to allow a poll of Associate Members, residents of Limehouse, or such grouping as is deemed necessary.

7.2 Where a decision has been passed under paragraph 7.1 the Chair will take advice and proceed on the matter as directed by the Executive. This action may be the drafting of a resolution, the drafting of a formal letter, the formation of a Working Party, further investigation, delegation or any other action. Once a decision is made under Paragraph 7.1 no Member may dissent publicly from the decision taken. This in no way prohibits a Member from requesting the reconsideration of the matter at a subsequent meeting or resigning from the Forum.

7.3 The business to be conducted at any meeting shall be such as shall be directed by the Chair. Additional items may be added to the agenda upon request by any member, supported by two other members provided prior notice of the item is provided to the Secretary not less than 10 days before the meeting, unless otherwise agreed by the Chair.

7.4 If a Member cannot attend a meeting at which a matter is to be considered, the Chair, at their discretion may authorise a replacement to attend and vote on the Members behalf, provided written authorisation is received and accepted by the Secretary 48 hours prior to the meeting. Proxy voting on any matter, including for an election, is at the discretion of the Executive, who will determine the procedure, if any.

7.5 The Secretary shall give to each Member not less than 10 (ten) days written notice, where possible, of any General Meeting, specifying the date, time and place of the meeting, and the business to be transacted.

7.6 An Extraordinary General Meeting (EGM) shall be held if convened by the Executive, or if requisitioned to the Secretary by 10 (ten) voting members of the Forum.

7.7 Minutes shall be kept by the Secretary or in their absence by someone deputised to take a note of the proceedings of all meetings.

8. Finance

8.1 The Forum shall have the power to raise money for the purposes of the Forum. The Executive shall maintain an account at a bank and/or a building society to be selected from time to time by the Executive, into which all receipts of the Forum shall be paid with a mandate for withdrawal, including not less than 2 signatories. Money for the time being not required for the purposes of the Forum, may be placed on deposit account, or invested in any other manner approved by the Executive. The Treasurer shall be responsible (under the supervision of the Executive) for the management of the finances of the Forum, although other Officers may also be signatories of such bank accounts as agreed by the Executive from time to time. The Treasurer shall cause accounts to be prepared in respect of each year, and laid before the Annual General Meeting..

8.2 The Executive shall have the sole management of the incomes, funds and property of the Forum. It shall be entitled to apply for such funding and receive donations and sponsorship of any nature from third parties as it considers appropriate or may delegate this authority. It will be entitled to provide such funding to initiatives benefiting all or some of the Limehouse residents.

8.3 No contracts or other financial liabilities may be entered into / incurred on behalf of the Forum unless authorised by the Executive.

8.4 The financial year for the Forum shall be 1st January to 31st December.

9. Amendments

This Constitution may be altered by a resolution passed at a General Meeting supported on a show of hands by at least 2/3rd of Members who as their status allows and who are present and voting at the relevant meeting. Notice of such a resolution shall be given to the Secretary not less than 21 (twenty-one) days before the Meeting, and the Secretary shall give to each member of the Forum, not less than 21 days written notice of such a resolution.

10. Media Relations

No Member or Associate Member shall make any statement on behalf of the Forum and/or its Working Parties and its members, whether publicly or privately, without prior agreement of the Chair or the Executive as appropriate. Representations on behalf of the Forum or its Working Parties must be authorised and or signed (as appropriate) by a member of the Executive. Failing to sanction comments or corresponding illegitimately under the name of the Forum or its Working Parties may result in loss of Membership.

11. Working Parties

11.1 Members may from time to time suggest Working Parties to be formed by the Chair with the permission of the Executive to investigate and/or report on matters of interest to the Forum. These Working Parties may vary in size, duration and make-up as needs and resources dictate.

11.2 Leadership of all Working Parties will be by agreement and consent from the Chair in partnership with the Executive. Working Parties shall have a degree of autonomy, while still abiding by this Constitution and Terms of Reference and should normally meet outside of any General Meetings in a less formal setting to conduct their business, but are at all times remain answerable to the Executive.

11.3 Working Parties will be required to report at all General Meetings.



Equality Impact Analysis Initial Screening Tool

Section 1.0: Background Information

Name of Completing Officer:	Steven Heywood
Date of Initial Screening:	10/12/2020
Service Area & Directorate:	Strategic Planning, Place
Head of Service:	Ann Sutcliffe

Section 2.0: Summary of policy, proposal or activity being screened

Name of policy, proposal or activity:
Neighbourhood Planning: Determination of Limehouse Community Forum Application
What are the aims / objectives of the policy, proposal or activity?
To assess an application for a neighbourhood forum designation in the Limehouse Neighbourhood Planning Area.



Section 3.0: Equality Impact Analysis Test:

Is there a risk that the policy, proposal or activity being screened disproportionately adversely impacts (directly or indirectly) on any of the groups of people listed below ? Please consider the impact on overall communities, residents and Council employees. This should include people of different:	Yes	No	Comments :
<ul style="list-style-type: none"> ▪ Sex 		X	
<ul style="list-style-type: none"> ▪ Age 		X	
<ul style="list-style-type: none"> ▪ Race 		X	
<ul style="list-style-type: none"> ▪ Religion or Philosophical belief 		X	
<ul style="list-style-type: none"> ▪ Sexual Orientation 		X	
<ul style="list-style-type: none"> ▪ Gender re-assignment status 		X	
<ul style="list-style-type: none"> ▪ People who have a Disability (Physical, learning difficulties, mental health and medical conditions) 		X	
<ul style="list-style-type: none"> ▪ Marriage and Civil Partnerships status 		X	
<ul style="list-style-type: none"> ▪ People who are Pregnant and Maternity 		X	
<p>You should also consider:</p> <ul style="list-style-type: none"> ▪ Parents and Carers ▪ Socio and Economic status ▪ People with different Gender Identities e.g. Gender fluid, Non Binary etc. 		X	<p>For all characteristics: the Forum has adopted a written constitution that allows membership for all people who live, work, carry out business, or are elected representatives of the neighbourhood planning area, without discriminating against any of the protected characteristics or the additional characteristics considered through this tool.</p>

If you have answered **Yes** to one or more of the groups of people listed above, **a full Equality Impact Assessment is required.**

The only exceptions to this are listed in sections 5.1 and 5.2 of this document.



Section 4.0: Justifying Discrimination:

Are all risks of inequalities identified capable of being justified because there is a:

- (i) *Genuine Reason* for implementation
- (ii) The activity represents a *Proportionate Means* of achieving a *Legitimate Council Aim*
- (iii) There is a *Genuine Occupational Requirement* for the council to implement this activity

Section 5.0: Conclusion

Before answering the next question, please note that there are generally only two reasons a full Equality Impact Analysis is not required. These are:

- 5.1 The policy, activity or proposal is likely to have **no or minimal impact** on the groups listed in section three of this document.
- 5.2 Any discrimination or disadvantage identified is **capable of being justified** for one or more of the reasons detailed in the previous section of this document.

5.3 Conclusion Details:

5.4 Do you recommend a fully Equality Impact Analysis is performed ?

Yes

No

5.5 Reasons a full Equality Impact Analysis is not required:

The proposal related to the designation of a neighbourhood forum. The proposed forum has a written constitution that allows membership to all people with a geographical link to the relevant area, without discriminating against any of the protected characteristics. It is therefore expected that there will be no impact on any groups with protected characteristics as a result of this proposal.

If you have answered **YES** to this question, please proceed to section 6.0 Sign Off.

If you have answered **NO** to this question, please detail your reasons in section 5.5 (across) before proceeding to section 6.0 Sign Off.

Section 6.0: Sign Off:

Signed Date:

Name: Position:

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**Designation of Limehouse Neighbourhood Planning Forum
Consultation Statement
January 2021**

Introduction

1. On 24 November 2020, the Limehouse Community Forum applied to the Council to be designated as the Neighbourhood Planning Forum for the Limehouse Neighbourhood Planning Area. The application was assessed to be in keeping with the relevant regulations, and in accordance with Regulation 9 of the Neighbourhood Planning (General) Regulations 2012 a public consultation period was held between 3 December 2020 and 27 January 2021. This was more than the required 6 weeks, in order to account for the holiday period which fell in the middle of the consultation, and to ensure that all interested parties had suitable opportunity to submit responses.
2. The consultation had originally been planned to end on 22 January 2021. However, after the consultation had begun, it emerged that there was a mistake on the application form. The form stated that the forum's application to be re-designated had the full support of Limehouse councillor James King. This was not accurate, and the forum stated it had been mistakenly copied over from an earlier draft. After discussion between officers, the councillor, and members of the neighbourhood forum, it was agreed that the sentence would be removed from the application form and the consultation would be extended by five days (the amount of time the erroneous form had been available).
3. This document provides an overview of matters raised during the consultation period. This paper has been prepared for public information and to inform the Council's decision making process – it is not intended to address any of the issues raised during the consultation period.

Consultation activities undertaken by the Council

4. Consultation activities undertaken by the Council were carried out in accordance with the Neighbourhood Planning Regulations and the principles expressed in the Council's Statement of Community Involvement. The activities undertaken were as follows:
 - The application form, supporting materials, and consultation information were placed on the Council's website
 - The same information was sent directly to the elected councillors for the Limehouse and Shadwell wards
 - An email announcing the consultation and explaining where the relevant information could be found was sent to everyone on the Plan Making Team's consultation database
 - A public notice was published in the Docklands & East London Advertiser

- Due to government guidance around the coronavirus pandemic, hard copies of the consultation material were not made available at the Town Hall or in Idea Stores close to the neighbourhood planning area on this occasion – respondents were encouraged to contact the Plan Making team if this caused any difficulties

Approach to categorising representations made

5. During the public consultation period, the public are able to make representations on the contents of forum application submitted to the Council. Typically, representations are made by local residents, local Councillors, landowners, businesses, interests groups, statutory consultees and neighbouring Local Authorities. Representations were not made by all parties directly consulted.
6. Annex 1 presents representations in date order. Where an individual has submitted more than one response, these have been grouped together and counted as one representation. The following categories have been used to categorise representations:

Support	Have stated explicit support, or support has been inferred from the contents of the representation
Object	Have stated explicit objection, or objection has been inferred from the contents of the representation
Neutral	Have offered comments but not determined if they object or support the application, or have stated 'no objection' to the application without explicitly supporting it
Petition	A written objection signed by multiple signatories
No comment	Where no comment has been made and no position on the matter can be inferred
Concerned	Do not state they object but highlight areas of concern

Summary of representations

Number of representations received

Support	Objection	Neutral	No comment	Petition	Concerned	Total
6	23	2	5	0	2	38

7. A total of 38 responses were received to the consultation.
8. No comment: One of the responses, from Sport England, provided generic comments on the role of sports in neighbourhood planning, but did not address any of the specifics of this particular neighbourhood forum application, and has therefore been treated as a 'no comment'. Transport for London, Natural

England, the Canal and River Trust and the Environment Agency stated they have no comments to make on the application.

9. Neutral: Historic England stated they have no objection to the application, and did not wish to provide detailed comments. The Port of London Authority also stated they have no objection.
10. Positive: Six positive responses were received from individuals. These responses were generally short and provided no additional detail as to why the Forum is supported (although it is not unusual for supporting emails to be written in this way).
11. Negative: 23 negative responses were received from individuals. The text of these objections (and all other representations) can be read in Annex 1. The objections covered a wide range of topics, including:
 - Lack of neighbourhood planning activity by the Forum, lack of interest in neighbourhood planning, and the Limehouse Community Forum holding its neighbourhood planning sub-committee at arm's length rather than neighbourhood planning being an integral part of the Forum's function.
 - Lack of concern with the environmental wellbeing of the area, with respondents claiming that the Forum's environmental activities extended only to a gardening club, with no concern for other environmental issues.
 - Significant disagreement over the creation of a new constitution for the Forum, including accusations that due process was not followed in the development and approval of the constitution.
 - The Forum's demographic make-up not being representative of the wider Limehouse area.
 - Respondents feeling that they had felt excluded from the Forum.
 - Suggestions that an alternative group had formed that would like to apply to be the neighbourhood forum.
 - Concern over the actions of some of the Forum's members, with two responses making accusations of 'bullying'.
12. The above is not intended to be an exhaustive analysis of the negative responses, but to provide an overview of some of the major causes for concern that were raised. The text of all responses can be read in Annex 1 below, and the Cabinet report for this matter will discuss the impact of these responses and the final officer recommendation.
13. Concerned: Two responses were categorised as raising concerns without being explicitly against the designation of the forum. One of these, from an individual, raised similar issues to the negative responses. The other, from the SPLASH community group (which is also the neighbourhood forum for the adjacent Poplar area), raised concern that there was a lack of representation from some of the estates that work with SPLASH but are within the Limehouse neighbourhood planning area.

14. Below are two annexes, the first presenting the main text of all the responses received during the consultation period; the second reproducing the text of a longer document from May 2020 that was submitted with one of the representations, and raises concerns about the process of creating the forum's new constitution.

Annex 1: Consultation Responses

[The consultation responses have been ordered by date and colour-coded as negative, concerned, neutral, positive, or no comment. At the request of Cllr James King, and due to concerns that some representations make accusations of bullying, representations from residents have been presented anonymously, and identifying information has been removed as far as is reasonably possible – the main exception being where respondents have referred to their own roles or previous roles in the Forum. The response from Reverend Richard Bray has not been anonymised, as the issue of the Reverend’s membership of the Forum is directly related to claims made in another response. The entire main body of each response from residents has been included, leaving out openings and closings. Some text has been removed from some of the organisational responses where this related more broadly to neighbourhood planning and did not directly address the issue of the neighbourhood forum designation.]

Reference	Respondent	Status	Comments
1	Sport England (04/12/20)	No Comment	<p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Playing Fields Policy and Guidance document.</p>
2	Port of London Authority (09/12/20)	Neutral	<p>Thank you for consulting the Port of London Authority (PLA) on the two Neighbourhood Planning consultations being undertaken within the London Borough of Tower Hamlets for the re-designation of the Spitalfields Neighbourhood Forum and the Limehouse Neighbourhood Forum.</p> <p>To confirm the PLA has no objection to the re-designation of the two Neighbourhood Forums.</p>

3	Transport for London (11/12/20)	No Comment	Thank you for consulting Transport for London (TfL). I can confirm that we have no comments to make on the application to re-designate Limehouse Neighbourhood Forum. We have a number of interests and assets in the designated area including the DLR and the A13 and so we look forward to liaising with the Forum as they begin work on a draft Neighbourhood Plan.
4	Historic England (11/12/20)	Neutral	We have no objections to the renewal of the Neighbourhood Forum as submitted, and do not wish to comment in detail.
5	Individual Response (14/12/20 and 18/12/20)	Negative	<p>I wish to lodge my objection to the LCF's application for re-designation.</p> <p>The group has had five years or more to deliver a plan and it has not done so. I believe that its motivation for renewing its designation is self serving, rather than in the best interests of the Limehouse environment.</p> <p>The LCF is neither an open nor transparent group and, in my view, has used questionable practices in the past year in order to change its constitution and re-elect its Chair. (14/12/20)</p> <p>Approximately 1 year ago the LCF publicly claimed that the Tower Hamlets Planning Department had ruled its 5 year old constitution to be unlawful. Several LCF Members, including myself and Cllr James King requested that this claim either be substantiated or withdrawn. It was neither substantiated nor withdrawn.</p> <p>Secondly, the LCF constitution made no provision for electronic voting, only by a show of hands at a properly constituted EGM. The LCF duly scheduled an EGM, before the first lockdown, but permitted no discussion of their proposed constitution, despite the fact that around 30 LCF Members showed up for the meeting at the designated time and place.</p> <p>In fact this EGM was not a meeting at all and only one LCF officer was in attendance to take votes. Whilst, Covid 19 has changed the way in which Groups meet and vote, this was not the main driver for the electronic vote in this case. I know of at least 30 Limehouse residents who would strongly contend that the LCF does not have a legitimate constitution.</p>

			<p>Turning to the LCF application. I believe that they are hugely overstating their environmental credentials and achievements. For example, LIMEgreen was consistently described as a gardening club during my tenure as an LCF officer during 2019, and you might conclude that the motivation for LCF is purely to find favour in the eyes of The Council. No LCF member meetings have been held to debate or understand any broadening scope of a green platform. In fact, the LCF has not held a single Members meeting during the whole of 2020. (18/12/20)</p>
6	<p>Individual Response (14/12/20 and 20/01/21)</p>	Negative	<p>I wish to lodge my objection to the LCF's application for re-designation.</p> <p>The group has had five years or more to deliver a plan and it has not done so. I believe that its motivation for renewing its designation is self serving, rather than in the best interests of the Limehouse environment.</p> <p>The LCF is neither an open nor transparent group and, in my view, has used questionable practices in the past year in order to change its constitution and re-elect its Chair. (14/12/20)</p> <p>Regarding the Limehouse Community Forum (lcf) asking for redesignation as Neighbourhood Planning Forum. They have had Five years and failed to create a Neighbourhood Plan. Giving them another five will just delay and lose more opportunities for in particular Green Space Designation. We have already lost areas and will lose more due to there inabilities or other commitments LimeFest for one which there do very well. I think they should let others who have more time/less commitments to get this in place very much fast and high spec in less than five years.</p> <p>There idea of the Enviroment is to plant a few flowers here and there to make the place look nicer. Which does little to nothing to improve the Air Quality.</p> <p>Also there constitution is undemocratic</p> <p>There is at least one other group in the area who really are trying to impove the enviroment including greening(green walls/roofs) reducing CO2 ommisions and other noxious gassess from car emissions. And</p>

			would like to be the designated Neighbourhood Planning Forum. But as there can only be one then they cannot even apply until there is a vacancy which can only happen if (lcf) are no longer designated. (20/01/21)
7	Individual Response (16/12/20)	Positive	I would like to formally support the changes proposed.
8	Individual Response (29/12/20 and 25/01/21)	Negative	<p>I OBJECT to the re appointment of the Limehouse Community Forum as a authorised Neighbourhood Planning Forum, I base my objections on the below:</p> <ul style="list-style-type: none"> - lack of any planning actually being made despite them already being a designated Planning Forum for the past 5 years - no official responses to the over development in Limehouse despite the opportunity to present a plan for Limehouse to make it a lovely place to live and work (which the council says is its goal) - no plans for the area being proposed at all - Total lack of engagement in the community - this has been especially evident over this pandemic - The LCF is run like a mini mafia- its either agree with the Chair (who I'm not even sure is in this country at the moment, but suspect he is in Florida) and Co chair or you are pushed out. It is due to their nasty bullying tactics that there has been no progress in Limehouse despite other more team and community orientated residents wanted to be involved (myself included by I couldn't cope with their 'approach'). <p>I would propose this is re put out to tender and propose the Friends of Limehouse group that is a community minded group of individuals that are focussed on all elements of the community. (29/12/20)</p> <p>I am writing in objection to the Limehouse Community Forum's application for re-designation as a Neighbourhood Planning Forum.</p> <p>I am a long term Limehouse resident, and have attended LCF meetings when possible. I was also involved in the LCF as a more active member until the toxic nature of the running of the LCF (by the Chairman and select long term members) forced me to leave active participation as it was not a cohesive, team and community orientated environment.</p>

			<p>During the time the LCF has been active it has been successful in creating and building Limefest, the History nights but it has done nothing towards building or running a Neighbourhood Planning Forum. It has failed to produce a neighbourhood plan in the five years since its designation, it has failed in its view into the continued (and unsuitable_ planning in and around Limehouse- an example being the overall tall tower block by Westferry DLR that will create light pollution, toxic fumes pollution, will add too many people/ cars/ taxis and is unsuitable to the area, damaging this already very crowded part of the Borough.</p> <p>Some of the reasons the LCF is not equipped to produce a neighbourhood plan:</p> <ol style="list-style-type: none"> 1) The Limehouse Community Forum membership is not representative of the people who live in Limehouse. It remains an exclusive group of people that is not welcoming to other joining. 2) It does not encourage diversity of people or thought- in fact it positively discourages anyone questioning the Chair and close team who run the LCF. 3) Membership to the LCF is restricted under the current constitution. Under section 4B of the application form, in reference to the current constitution, it is stated that 'membership is open to all who live, work, or have a business in the NP area'. However, it fails to point out that Limehouse residents are no longer automatically LCF members. They must first apply and then be approved by the Chair and his Executives. The Chair is entitled to appoint as many Vice-chairs as he wishes, enabling him to secure a majority of the Executives votes, allowing him to refuse membership to those whose opinions he does not approve. 4) The LCF has failed to support the NPF and only actually attended one meeting to discuss the Neighbour Planning Forum. There is no focus on the Planning Forum, BUT the Chair wants to be able to veto anything the NPF proposed. In reality the NPF has achieved NOTHING under the LCF. 5) I am not aware of any efforts by the NPF under the LCF to reach out to community members to solicit their views on what the Neighbourhood should look like- and how to make it a great place to live and work for all. In fact, over this last year I have heard NOTHING from the LCF or the NPF at all- and am not even sure if the present Chair is even in this country- let alone Limehouse. 6) the NPF has no projects in flight or working or any projects and has completed no projects. <p>The LCF is not the forum to run a NPF. Limehouse needs a NPF urgently- but one that is well managed, open, inclusive, and will make this area a better place to live and work. (25/01/21)</p>
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9	Individual Response (07/01/21)	Positive	I am writing in support of the current Limehouse Neighbourhood Forum being renewed.
10	Natural England (15/01/21)	No Comment	Natural England does not wish to make comment on the suitability of the proposed plan area or the proposed neighbourhood planning body.
11	Individual Response (18/01/21)	Negative	<p>I am writing to object to the application for resedignation of the Limehouse Community Forum as a Neighbourhood Planning Forum.</p> <p>The Limehouse Community Forum has never tried to do any outreach work. It has never tried to engage the whole of the local community, in particular the BAME community, so how is it suited to represent me?</p> <p>In fact, the Limehouse Community Forum serves as a gatekeeper, keeping resources and knowledge out of reach of the residents it supposedly serves.</p> <p>I read with interest the application and all the claims the forum made of the things it accomplished. I find it interesting that neither I nor my neighbours knew anything about it. Can it be because the only interests it serves are of those represented in the board? If no one that looks like me is there how can it claim to represent me? In fact, I would urge an investigation into whether there is an equal opportunities policy in place and if this is being actively upheld or if, as I suspect, discrimination and gatekeeping is rife. I truly believe that the board is keeping BAME communities from having their voices heard or accessing its resources.</p> <p>Moreover, the Limehouse Community Forum is best known for its annual fete in Ropemakers field and little else of any real value to the community. I must say, however that posters for this fete, never reach past Cyril Jackson Primary school. It is as if anything past Gill Street didn't exist. And let's, face it a fete is without a doubt the most inconsequential thing a Community forum can do.</p> <p>Limehouse ward encompasses more than just the Limehouse marina, it encompasses a rich and diverse community with complex issues. If, however, you attended any of the Limehouse Community Forum meetings,</p>

			<p>you would be forgiven if you thought that the meetings were about anything other than the Limehouse neighbourhood.</p> <p>I strongly urge you to not approve the Limehouse redesignation application as I fear it will serve as both a deterrent and as gatekeeper for BAME communities to both access resources and having their concerns taken into consideration when completing neighbourhood plans, thus exacerbating the many social – economic issues already faced by this community.</p>
12	Individual Response (18/01/21 and 26/01/21)	Negative	<p>I would not support renewal of the existing group.</p> <p>As a statutory body in my judgement, the LCF has not been managed appropriately. May I ask if you have understood the representations from other Limehouse resident as to providing evidence please.</p> <p>Apologies this is coming late and close to end of consultation period.</p> <p>Also the community has been unrepresented by LCF.</p> <p>Neighbours have regularly asked for accounts over the years and to my knowledge these have not been made available (if you have these it would be good to see them).</p> <p>After five years there has not been a Neighbourhood Plan as required.</p> <p>Due to current circumstances communications between Limehouse residents has been very difficult. Normally we would have met and written to you formally.</p> <p>I hope others with more knowledge than I have been in touch.</p> <p>There have been meetings last year that were chaotically run by LCF, embarrassing to those who attended.</p> <p>Sorry - this is the best I can provide this evening - I feel it could be “the tip of the iceberg”. (18/01/21)</p>

			<p>[In response to the second paragraph of the above email, the Plan Making team replied to explain the neighbourhood planning regulations and what could be taken into account in making the designation. The email below was received in response to this]</p> <p>The judgement by many in Limehouse on the fifth point [relating to the considerations in the Town and Country Planning Act 1990, Section 61F(7), on the 'desirability' of designating a forum which is drawn from different areas and sections of the community] is a definite no. There are people who have felt excluded and decision making had been not transparent over the years.</p> <p>I have not seen any neighbourhood plan and have not been able to track down the results of reports that "consultants" paid to advise on it.</p> <p>This has caused a most unhelpful divide in our little community, my judgement also comes from observing whilst attending meetings, talking to individuals and attempting to extract information on proceedings plans etc.</p> <p>So - to conclude this - I would not support the redesignation. I would look to helping a new group form and apply for designation if you decide to turn down this application, which in my opinion would be what is best for Limehouse. (26/01/21)</p>
13	Environment Agency (20/01/21)	No Comment	<p>We have no comments to make at this stage, however, depending on the environmental risks or opportunities within these areas, we may comment at the later stages of these neighbourhood plan. We will focus our detailed engagement on those areas where the environmental risks are greatest.</p> <p>We encourage the Neighbourhood Forum to seek ways in which their neighbourhood plan can improve the local environment. For your information, together with Natural England, English Heritage and Forestry Commission we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: https://neighbourhoodplanning.org/toolkits-and-guidance/consider-environment-neighbourhood-plans/</p>

14	Canal and River Trust (21/02/21)	No Comment	Based on the information available our substantive response (as required by the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended)) is that the trust has no comment to make on the proposal.
15	Individual Response (21/01/21)	Negative	<p><u>Introduction</u></p> <p>Until April last year I was the longest serving active member of LCF, joining in January 2007 a few months after it was established. I am a passionate supporter of the LCF concept, have been involved in all its activities and was the first member, after the chair, on the application form for LCF to be designated the neighbourhood forum for Limehouse, as approved by LBTH in December 2015.</p> <p>However, I am opposed to the re-designation of the LCF as the neighbourhood forum for Limehouse now as I believe it is unqualified to hold that title and incapable of producing the required neighbourhood plan. In addition, for the LCF to hold the designation for a further 5 years would prevent others from doing so and achieving this important task.</p> <p>In explaining my view, I will refer to Governance, Community Representation, and Effectiveness. Where relevant, I will also refer to the clause numbers within section 61F of the amended Town and Country Planning Act 1990, as required to meet the conditions of the Localism Act 2011 for the designation of a neighbourhood forum.</p> <p>To support my position I attach the following documents:</p> <ol style="list-style-type: none"> 1. A Statement of Evidence on the management of LCF produced by former officers and/or long-standing LCF members. 2. An email regarding 2016 LIMEfest and Ramadan. 3. Limehouse Youth Support Group meeting minutes. <p><u>Governance</u></p> <p>Whilst there are many admirable activities which residents associated with LCF undertake, for some time now the chair and some supporting officers have been acting unconstitutionally, without transparency and in a</p>

			<p>generally improper manner. The attached Statement of Evidence with Appendices provides a sample of these actions between January 2019 and April 2020.</p> <p>These included but are not limited to a series of events covered in the Statement where, in order to dictate how LCF should continue to operate, the incumbent chair and vice chairs unconstitutionally and undemocratically contrived the voting for a new constitution and to retain the incumbent chair. As a neighbourhood forum these actions contravened clause (5)(d) section 61F of the Act, referring to a required constitution which, to be of any purpose, must be followed.</p> <p>The minutes of the 10th April 2019 LCF meeting (Statement Appendix A) describes how the LCF chair read out a previously unseen resolution to remove an officer. Following opposition to this undebated resolution, the minutes said of the chair “He stated that if it were not passed this evening, it is within his power to suspend the LCF and cancel the upcoming planned events”, for which he had no authority. The resolution was carried on the night. It seems clear the main purpose of the resolution was to dismiss, or have resign, the LCF secretary who had led a team in preparing a new constitution worded contrary to the chair’s personal views. This improper action followed many others by the chair and close officers which sufficiently aggrieved the LCF secretary to cause him to resign on 9th May 2019 (Appendix B)</p> <p>This type of behaviour continued when in January 2020 a long serving LCF member applied to stand for election as chair, under the conditions of the existing constitution of 2015, at an AGM scheduled for 29th January 2020. The incumbent chair initially attempted to thwart the application by falsely claiming it inconsistent with the constitution (Appendix E). When this failed, he then claimed the existing constitution was “unlawful” and alleged there was need for a new constitution in order for a chair election to take place (Appendix H). This again was untrue. Whilst the existing constitution needed amendment to clarify the difference between representative and private members, it had been approved by LBTH for LCF’s designation as a neighbourhood forum in 2015, and used for the re-election of the incumbent chair each year since that date. In correspondence to members, the LCF chair stated that the LBTH had agreed the 2015 constitution was unlawful, which was untrue as they had not agreed. LBTH were aware of the chair’s false statement but issued no denial, thereby allowing LCF members to believe LBTH agreed with the chair.</p>
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			<p>events, it is clear that LCF is run by and for a single socio-economic and ethnic (white British) section of the Limehouse community. This ethnic section represents around 40% of the Limehouse population. Any involvement of the other diverse sections of the Limehouse community is sporadic. As a neighbourhood forum, this contravenes clause (7)(a) section 61F of the Act, referring to the requirement that membership is drawn from different places in the neighbourhood area, from different sections of the community, and reflects the character of the area.</p> <p>Whilst other sections of the community are not prevented from being involved with the LCF, they are not encouraged, and sometimes are resisted by those who predominantly run the organisation. In January 2016, after LCF had been designated as a neighbourhood forum, members anxious to reach out to other sections of the community requested that the date of the LCF annual summer festival, LIMEfest, was moved forward by one week to avoid Ramadan. It would have been simple to change the date of the event 6 months ahead of time, and would then not have discouraged the Muslim community from engaging with the LCF. Following an exchange of emails with those running LIMEfest, the proposed revision was rejected by the LCF chair, and his email is attached. In that decision, beyond a disregard for a significant section of the Limehouse community, it is revealing to hear the chair raise the possibility that “parents are imposing a particular dogma” with their religious beliefs.</p> <p>In 2016, concerned about the long-standing problem of ASB across Limehouse, a group of LCF members took advice from senior police officers and youth specialists to pursue a comprehensive approach to solve the problem through youth engagement instead of concentrating only on enforcement. This was taken up with the Borough Mayor who authorised a standing meeting under a Deputy Mayor to help develop a partnership of authorities, providers of funding, facilities, youth expert and the community, to address the problem through engagement. This formula has proved successful both locally and across the UK where large reductions in crime and ASB have been achieved. As part of the community involvement, in 2017 a Limehouse Youth Support Group (LYSG) was established in the eastern part of Limehouse where most of the young people live. LYSG meeting minutes are attached. This was an important part of establishing engagement with young people and their diverse community. In March 2018, whilst the partnership and youth support was being progressed and without the knowledge of the LCF members involved, the LCF chair suddenly advised the Mayor that the LCF wished instead to establish a so called Youth Ward Panel, which would meet every 3</p>
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			<p>months at the Limehouse Youth Centre to assist with Centre activities. The Partnership and LYSG initiative was therefore discontinued. This was another lost opportunity to involve the wider community as required of a neighbourhood forum.</p> <p><u>Effectiveness</u></p> <p>The LCF was established for wider community benefit from a resident group initially formed to undertake a summer's fete in 2006. Social events have always featured prominently and are well produced and attended. Other activities, such as responding to crime, ASB and planning applications, are largely reactive, subsidiary and undertaken in separate groups. These groups come together for large events, such as the summer LIMEfest, but otherwise are responsible for their own development, marketing and membership. This applies to the group trying to produce the neighbourhood plan. The LCF chair and close officers present the public face of LCF but are only involved with the groups in which they are interested, and take no part in coordination between the groups. Whilst registered members number around 600 in LCF, rarely are there more than about 12 active members in total at any one time.</p> <p>When LCF was designated as a neighbourhood forum in 2015, of the 21 residents on the application form only 3 subsequently attended any neighbourhood forum meetings. This includes the LCF chair who has attended just one meeting in 5 years. The group has had to develop without organised support from LCF as a whole and generally has around 6 members for meetings, well short of the number needed to produce a neighbourhood plan. It is understandable that this has not been achieved in 5 years. None of these 6 are included in the 2020 re-designation application and, to my knowledge, none of the 21 members in that application have ever attended a neighbourhood forum meeting in the current 5 year period, except for the LCF chair's attendance on one occasion.</p> <p>Whilst its social events and meetings are popular and serve a valuable function for a section of the Limehouse community, with its current structure and method of operating the LCF fails on the delivery of one of its core objectives which is to protect and improve Limehouse. Similarly as a neighbourhood forum, other than social activities for a section of the community, it does not meet the requirements of clause (5)(a) section 61F of the Act, to promote the social, economic and environmental well-being of the area.</p>
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			<p><u>Conclusions</u></p> <p>As a long-standing member of LCF, I'm a passionate supporter of its concept and believe there are many admirable activities which residents associated with LCF undertake which serve a valuable function for a section of the Limehouse community. However, I am opposed to the re-designation of the LCF as the neighbourhood forum for Limehouse as I now believe it is unqualified to hold that title.</p> <p>Under the headings of Governance, Community Representation, and Effectiveness, I have demonstrated that the LCF does not meet the statutory requirements to be re-designated as a neighbourhood forum. This assertion is based on, amongst other things:</p> <ol style="list-style-type: none"> 1. not adhering to a constitution; 2. not having members from different places of the neighbourhood, from different sections of the community, and reflecting the character of the area; 3. not able to promote the social, economic and environmental well-being of the whole area. <p>Beyond not having the qualifications, I believe that due to its structure and method of operating it is incapable of producing the required neighbourhood plan which it has failed to do as a designated neighbourhood forum over the past 5 years. In addition, if LCF were to hold the designation for a further 5 years it would prevent others from doing so and achieving this important task. If LBTH approves the re-designation of LCF as the neighbourhood forum for Limehouse, the evidence I've presented suggests LBTH should be held accountable for that decision.</p> <p>[A pdf was attached entitled 'Statement of Evidence – Management of the Limehouse Community Forum – May 2020', signed by five people who call themselves 'concerned LCF members'. Four of these five members have also submitted representations to this consultation. The content of this pdf is reproduced in Annex 2 below]</p>
16	Individual Response (22/01/21)	Positive	This email is to register my support for the Limehouse NPF.

17	Individual Response (22/01/21)	Negative	<p>I am writing in objection to the Limehouse Community Forum's application for re-designation as a Neighbourhood Planning Forum.</p> <p>As a Limehouse resident, I was involved with the Limehouse Community Forum from 2011 until 2019 and served as secretary for 3 of those years, in addition to running various programs and helping out with others, writing grant applications for funding, and attending numerous meetings, both formal and off-the-record, with the Chair and his Vice-chairs.</p> <p>Based on that experience, I feel that the LCF is very adept at running entertaining and informative social events and projects - it's LIMEfest summer festival and History Night proved very popular. However, it is seriously lacking in the basic requirements for running a successful Neighbourhood Planning Forum, as evidenced by its inability to have produced a neighbourhood plan in the five years since its designation.</p> <p>The LCF sent an email to all its members last night (attached), urging them to write to you in support of its application for redesignation as an NPF, and listing all its achievements of 2020. While many of these are admirable, please note that none of them have any relationship at all to LCF's remit as a planning forum.</p> <p>Some of the reasons the LCF is not equipped to produce a neighbourhood plan, and the inconsistencies in its application form which relate to these, are as follows:</p> <p>1) The Limehouse Community Forum membership is not representative of the people who live in Limehouse. 41% of Limehouse residents are 'white British' according to our last census, and it's the 'white British' who the LCF represents. Of the 21 members listed under Section 3B of the application form, not one represents our large Bangladeshi community living in the east of Limehouse. There have been few attempts by the Chair to reach out to this neighbourhood. His attitude has always been that 'they know where we are should they care to join us.'</p> <p>2) Membership to the LCF is restricted under the current constitution. Under section 4B of the application form, in reference to the current constitution, it is stated that 'membership is open to all who live, work, or have a business in the NP area'. However, it fails to point out that Limehouse residents are no longer</p>
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			<p>automatically LCF members. They must first apply and then be approved by the Chair and his Executives. Those unable to apply but still wishing to participate must register. This has obviously proved daunting for many of our Bangladeshi residents and others. It should also be noted that according to the current constitution, the Chair is entitled to appoint as many Vice-chairs as he wishes, enabling him to secure a majority of the Executives votes, and thus allowing him to refuse membership to those whose opinions he does not approve. (See Sect 1a and 4.3 of LCF Constitution attached).</p> <p>3) The Chair of the LCF has always held the Neighbourhood Planning Forum at arms-length, referring to it as 'an offshoot' and insisting 'it should be able to stand independently, or else we all get painted with the same brush'.</p> <p>In an email to me on 4th Jan 2016 (attached) he stated 'The LCF should separate any and all planning responsibilities it has as the NPF, and function independently from the Forum.' He goes on to say 'The group would open itself up to new members who are only concerned with a local plan for our ward, an independent Chair and Officers would function separately, but report to the LCF, who would have the final say to approve any referendum suggested by the NPF.' Please note that throughout the application form, each and every reference made to the Forum applies to the Limehouse Community Forum, not the Neighbourhood Planning Forum. In addition, there is no indication of what the planning forum has achieved to date, instead there is a running dialogue of what the LCF is doing, none of which is relevant to a neighbourhood plan. In his desire to keep the planning forum separate, the LCF Chair has done nothing to support or promote it, and has attended only one meeting, on 14th March 2018, during its five years of existence.</p> <p>4) In reference to the other 20 members listed under Section 3B of the application form, while all are LCF members, as far as I am aware none have had anything to do with the planning forum or attended any of its meetings. Because of the lack of support from the LCF, the planning forum has had great difficulty in attracting and keeping members, and it seems likely that this lack of support will continue.</p> <p>5) Under Section 1 of the application form, relating to how the Forum will seek to promote or improve environmental well-being, it has been stated that 'LIMEgreen has been established not only for gardening projects but to address the growing issues of climate change, street use, recycling, air quality and greening.' This is simply not true. I worked with two other LCF members to set up LIMEgreen, planning and organising its</p>
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			<p>monthly planting projects. It was established as a neighbourhood gardening club, nothing more, a monthly activity to draw in people and teach them how to get their hands dirty, attracting as much publicity for the LCF as possible in the process. The LCF Chair was totally unfamiliar with the concept of climate change or air quality. At the only Neighbourhood Planning Forum meeting he did attend, when the subject of green infrastructure came up he was heard to say 'Why are we putting in green infrastructure , why don't we just have window replacements.' He was serious about this...Since my departure from LIMEgreen in 2018, up until 2020 and lockdown, the only LIMEgreen project undertaken and completed involved the construction and planting up of three wooden planters which have been placed in front of the Limehouse Youth Hub.(Photo attached). Thus the 'growing issues of climate change, street use, recycling, air quality' have yet to be addressed by the LCF.</p> <p>As previously stated, I believe the LCF is seriously lacking in the basic requirements for running a successful Neighbourhood Planning Forum and, in view of the observations and evidence above, feel it would be very inappropriate for the LCF to be redesignated.</p>
18	Individual Response (22/01/21)	Negative	<p>Please find below my objections to the redesignation of Limehouse Community Forum as the neighbourhood planning forum for Limehouse.</p> <p>I have attempted to be part of the forum previously but had to stop trying because I found out that it was run by a few friends who excluded everyone else who didn't share their desires and interests.</p> <p>The forum does not proactively advertise for attendance or views from the community. The chair does not live in the area and appears to use the forum as a way to pursue his own business interests in the area.</p> <p>I have seen the exclusion at a meeting. It was an election meeting where someone stood for Secretary of forum. The Chair and his friends were not happy with the person who stood unopposed so halted the meeting to force someone who didn't live in the area and who didn't want the position to put themselves forward to prevent him taking up the post. It transpired that the person they didn't want as part of the forum narrowly won the vote, to which it was clear the chair was very unhappy.</p>

			<p>I don't know why they are such a closed group and do not invite or welcome all views from the community in which I live but that is why I no longer participate in the forum.</p> <p>The make up of the forum is clearly not made up with a cross section of the community and I'm not sure they would welcome opposing views to their own. I certainly wouldn't feel comfortable as a gay man trying to get them to tackle those issue.</p> <p>I have no faith that if I had comments, observations or objections to any planning application that they would be given any consideration at all. The same goes for a large section of the community in Limehouse.</p>
19	Individual Response (22/01/21)	Negative	<p>I am writing to object to the application by Limehouse Community Forum (LCF) for redesignation as the neighbourhood planning body for Limehouse. I object to this application on three grounds:</p> <ol style="list-style-type: none"> 1. Factual inaccuracies in the application; 2. Failure to comply with statutory requirements for designation; 3. Failure to have a membership that represents different areas and sections of the community; and 4. Governance failings. <p>Background</p> <p>My objections are based on experience of the LCF, having been a resident of Limehouse since autumn 2017, a member of the LCF from 2018 to 2019 and Secretary of the LCF for the first five months of 2019. In these roles, I attended meetings of the LCF, interacted with members and held regular discussions with the executive officers (at the time and current). I resigned as a member and Secretary of LCF due to persistent concerns about the governance, accountability and transparency of the LCF. I also reached the conclusion that the LCF did not represent the local community and that those running the LCF had no interest in changing this. Finally, I resigned due to an ongoing campaign of bullying by LCF officers.</p> <p>Factual Inaccuracies</p> <p>The following sections of LCF's application are incorrect:</p>

			<p>a. “Re-designation” of the LCF/LCF structure. At a meeting on 8 April 2019 with the Chair of LCF, Mark Slankard, and the Vice Chair, Helen Kenney, Mr Slankard and Ms Kenney informed me repeatedly that LCF was not the designated Neighbourhood Planning body for Limehouse. Instead, they informed that the Limehouse NPF – and LIMEgreen (the urban gardening operation) – were wholly independent of the LCF, with LCF providing only informal support to these organisations. The link between the LCF, LIMEgreen and the neighbourhood planning body in this application is therefore false; alternatively, if it is accurate, Mr Slankard’s and Ms Kenney’s statements indicate a concerning lack of understanding of the structure of the organisation they run. (See note of this meeting attached.)</p> <p>b. Section 1c: the Royal Foundation of St Katherine is within the current designated neighbourhood area for Limehouse and not, as stated in the application, to “the west of Limehouse”. This indicates a lack of knowledge of the neighbourhood by the LCF.</p> <p>c. Section 2a/Consultation: contrary to the statement in the application, the LCF constitution does not “commit” the LCF to consultation with any other body in Limehouse (or the wider area). There is no obligation on the LCF to do so;</p> <p>d. Section 2a/Contact Details: the LCF does not have a social media presence. The Chair of LCF, Mark Slankard, confirmed to me when I was elected Secretary that the LCF does not hold a Facebook account in its own name; I was told that the account cited in the application (Facebook-LimehouseMatters) is held by the former Vice Chair, Lesley Balding. Mr Slankard confirmed to me that the LCF does not have authority to use it for LCF business. When Secretary I was not informed that LCF had a Twitter account. The account I question appears to be operated by an individual, rather than a community organisation. Posts on the account also include party political content that would not be appropriate for an independent community organisation to post (for example, the frequent retweeting of Conservative Party campaign material in the run-up to the 2018 local elections). (See screenshots.) Neither account has been publicised in any LCF communication and they do not appear on the LCF website.</p>
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			<p>Statutory Requirements LCF does not meet the following statutory requirements for designation:</p> <p>a. Per its constitution, the LCF is not established for the express purpose of “promoting or improving the social, economic and environmental well-being” of the Limehouse neighbourhood, as required in section 61F(5)(a) of the Town and Country Planning Act 1990 (the 1990 Act);</p> <p>b. Per its constitution, the membership is open to nominated representatives of voluntary and community groups and such members count towards the minimum membership of 21. Therefore, the constitution does not guarantee that there will be at all times a minimum of 21 members who live, work or are an elected member in the Limehouse area, as required by section 61F(5)(c) of the 1990 Act;</p> <p>Membership The LCF has not, during its current period as designated neighbourhood planning forum, ensured that its membership represents different areas and sections of the community:</p> <p>a. Failure to publicise the existence and activities of the LCF: in over three years of living in Limehouse, the LCF has not once publicised (e.g. in canvassing, block leafletting, social media or noticeboards in local parks or shops) its activities. In particular, it has not publicised the dates of, or agendas for, its regular meetings. (For example, I only discovered the existence of the LCF via our local council candidate.)</p> <p>b. Contrary to the statement in its application that it operates an “open door” policy (see section 3(b)), the Chair of LCF, Mark Slankard, made clear to me when I was Secretary that open discussion during LCF meetings was not welcome. Specifically, when I added a 15 minute “Q&A” session to the beginning of the first meeting at which I was acting as Secretary, Mr Slankard told me in writing that the LCF does not allow neighbours to address LCF meetings without prior authorisation. Mr Slankard said that “[W]e do not solicit resolutions, we do not allow resolutions to be put forward at meetings without prior scrutiny. You must be aware of the dangerous situation this would put the Forum in, if someone with dubious or questionable intentions were to show up and force an issue - this could hijack a meeting and jeopardise the work that the Forum does. I cannot</p>
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			<p>and will not allow this.” This is clearly contrary to the role of a neighbourhood planning forum to encourage a diversity of views from across the neighbourhood. (See email from Mr Slankard of 9 May 2019.)</p> <p>c. As Secretary, I was informed that the LCF expects its Executive Officers to spend their own money on LCF activities. Specifically, Mr Slankard wrote to me that: “Neither I nor any other Officer has ever charged the Forum for printing 25 copies of the agenda, 25 copies of the minutes and a sign-in-sheet at any meetings. Nor would I expect an Officer to do so. Our service to the Limehouse community comes at a cost... we even donate small amounts of money. If someone doesn't have the time, energy or spare money to help out our community then what's the point?” Such an approach excludes those with no or little disposable income – including a significant section of the Limehouse population - from engaging in LCF activities. This means that a large part of the Limehouse neighbourhood is prevented by LCF policies from playing a full role in the neighbourhood planning process. (See email from Mr Slankard of 9 May 2019.)</p> <p>I also note the following issues with respect to membership:</p> <p>a. Until at least 2019, the LCF had no process to ensure that those joining the LCF were eligible to stand as members (there was no verification of members);</p> <p>b. Per its current constitution, the Chair may decide that Associate Members, who are not residents, workers of elected members in the Limehouse area, may vote on LCF matters, including neighbourhood planning matters. This is inconsistent with the principle of local decision-making for neighbourhood planning;</p> <p>c. Per its constitution, the Executive consists of Executive Members, with Executive Members comprising, <i>inter alia</i>, a potentially unlimited number of Working Party leaders, each of whom is appointed by the Chair. The Executive has the power, in its This provision therefore provides for the Chair to decide the membership of the LCF.</p> <p>Governance</p>
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			<p>There are significant concerns with respect to the governance of the LCF, which undermine confidence that it could act as an effective neighbourhood planning forum:</p> <p>a. Although designated as the relevant neighbourhood planning body for Limehouse since 2016, the current application makes no reference to any material development of the neighbourhood plan during the last five years and provides no evidence to conclude that any such development will be made if the LCF is re-designated;</p> <p>b. In my five months as Secretary no Executive Committee meetings took place (in person or virtually), despite my urging the Chair to hold a meeting; there is no provision in the constitution for Executive meetings to be held regularly;</p> <p>c. There is no collective governance amongst the Executive Committee; for example, at a general meeting in April 2019 the Chair proposed a resolution to amend the constitution, without notice to the Secretary;</p> <p>d. The LCF did not comply with the membership requirements of the constitution in force between its designation in 2016 and 2020 (e.g. it had no process to distinguish between “Representative Members” and “Private Members”);</p> <p>e. The LCF does not have a fundholder who can act as Accountable Body for the LCF (which is an unincorporated association).</p> <p>f. The constitution makes no provision for addressing conflicts of interest. (This is troubling given, by way of example, that the Chair of the LCF is an owner of an asset of community value that has previously been the subject of an application for conversion to residential premises.)</p>
20	Individual Response (23/01/21)	Positive	I am a resident of Limehouse and am writing to register my support for the renewal of Neighbourhood Planning Forum designation for the Limehouse Community Forum.

21	Individual Response (24/01/21)	Negative	<p>I am writing to object to the proposal regarding the Limehouse Neighbourhood forum.</p> <p>The Forum purports to cover the Limehouse area, it does not. The Forum concentrates on the area around Narrow Street and totally ignores Limehouse North of Commercial Road. The applications states that it welcomes all Limehouse residents, how can it do so, when all the area of Commercial Road is ignored; whilst it includes part of Ratcliff on the western side of the Basin.</p> <p>The Commercial Road boundary is so artificial. Commercial Road is the main high road through Limehouse and it does not divide the community, as historically the area has built up either side of the road. For example whilst the GP provision is on the South side of Commercial Road, the pharmacy is on the North side. Similarly the Church is on the South side of Commercial Road and the associated school is on the North side.</p> <p>My family have lived in this area for at least 225 years when my 5 x Gt Grandfather James Dunmore took his first born to be baptised at St Anne’s Church on Christmas Day 1794. To be told I do not live in Limehouse by the Limehouse Community Forum is an insult and if the Council supports this proposal that excludes many Limehouse residents, is not the way forward.</p>
22	Individual Response (24/01/21)	Negative	<p>I am writing to outline my objection to the re-designation of the Neighbourhood Planning Forum (“NPF”) for Limehouse to the Limehouse Community Forum (“LCF”).</p> <p>Having moved to Limehouse in 2017 as a young professional, I joined the LCF and then the NPF subgroup within LCF in 2018 as I thought of it as a crucial part of understanding and having input into our community for the future. The small group of members who were part of the NPF were highly dedicated and thoughtful to achieving the best for Limehouse and in a balanced way considering the need for additional housing in the area.</p> <p>What became clear to me very quickly was that the group was very isolated by the LCF, it’s parent. There was no support to either grow with new members or to publicise the work that was ongoing, which at the time was critical with the development of the Neighbourhood plan. This is surprising when LCF is so successful at promoting the events it runs such as Limefest and LimeGreen (which are genuinely successful).</p>

			<p>Being a part of the LCF and LCF's disregard of the work undertaken, there was no way that the NPF subgroup could be effective. I left being part of the NPF subgroup later that year as it was clear to me that there was very little ability to make traction in the community.</p> <p>I think the above is highlighted by LCF themselves when they list their achievements for 2020 in the email requesting that people vote for LCF to be re-designated and not one is related to neighbourhood planning (see attached)!</p> <p>As the designated entity, LCF should take responsibility for the lack of progress over the past 5 years with the NCF. <u>The isolated nature with which the NCF subgroup was treated begs the question of why LCF is trying to be re-designated at all.</u></p> <p>It would be more effective if a separate NCF is established which can integrate across the community (LCF is not representative of Limehouse borough as it has very little representation from our Bangladeshi community) and attract members who care about our borough's future.</p>
23	SPLASH (25/01/21)	Concerned	<p>I am concerned about the above Application Form from the Limehouse Forum as I do not see any representation from Grenada, Trinidad, Joseph Irwin, Providence, Bethlehem and Roche Houses or Saunders Close.</p> <p>These are some of the original blocks in the Limehouse area and seem not to be included in the proposals. Their needs are quite different from many of the more affluent Estates surrounding the Limehouse Basin. Unfortunately due to Ward configurations and Planning Forum Geographical limitations, the above blocks (several of which have been members of the SPLASH Organisation) are cut off from the Poplar Planning Forum which covers the other SPLASH Estates. Therefore all the greater urgency about ensuring their inclusion in the Limehouse Planning Forum area.</p> <p>Currently, the application to build a block of flats along side Trinidad House would mean that the Estate would lose it's one green patch and I know from experience how important Green spaces and the Environmental Impact of increased buildings is to Limehouse Forum members.</p>

			I do not think it would require a huge amount of time and energy to ensure membership and involvement of the above Blocks of flats in the Plan. Essentially , however, this needs to be a genuine involvement that represents the diverse community living in that area, not a token exercise!
24	Individual Response (25/01/21)	Negative	<p>I am writing to express my concerns at the renewal application of the Limehouse Community Forum to be the designated planning forum for Limehouse.</p> <p>The LCF does many good things as a community group, but it has not produced a neighbourhood plan in five years of office.</p> <p>The LCF also appears unrepresentative of the whole population of Limehouse. It has failed to recognise the concerns of east Limehouse residents in particular, where recent planning applications have impacted their lives.</p> <p>Accordingly, I do not support the LCF's application for redesignation.</p>
25	Individual Response (25/01/21)	Concerned	<p>As a resident of Limehouse, my observations and comments about continuing this local forum are as follows:</p> <ul style="list-style-type: none"> • if Limehouse Neighbourhood Planning Forum, as a sub-committee of Limehouse Community Forum, were an active or effective group, I'm pretty sure that as a local resident I would be well aware of it and its remit. That I'm not, suggests that the planning forum is not effective. With this group having been designated for the past five years, I've neither seen nor heard about anything valuably active within their remit. • I fail to understand the need for this group when there is a formal planning consultation process through Tower Hamlets Council, with public notifications and accompanying process for an interested resident's response. So if this group was designed to have a strategic planning influence, I feel it has been passive and has nothing to show for it.

			<ul style="list-style-type: none"> • while it may be a very poor way to assess a group from a written list, my first impression from the names of the people on the forum is that the group doesn't appear to reflect the diversity or inclusivity of the Limehouse population which, for me as a Trustee for a London-based organisation operating by Charity Commission guidelines, raises the question about how democratically-formed or representative this group is. • if Limehouse Neighbourhood Planning Forum is a subcommittee of Limehouse Community Forum, I question whether it is best practice for the Chair of both to be the same person. So while this raises the question of perceived vested or compromised interest in local affairs, a main concern is still that the Forum has been ineffective. • again, and entirely from slight observation, one of the higher profile officers of the Limehouse Neighbourhood Planning Forum once stood on a Conservative Party ticket; but while all colours are valid, democratically - we all have our different values - it raises a question about whether Limehouse Neighbourhood Planning Forum, as a sub-committee of Limehouse Community Forum colours an unstated political agenda with an angle on business across this grouping. • that there has been some criticism from a Limehouse Community Forum representative of the perceived effects around anti-social behaviour of vulnerable residents living in protected housing in Three Colt Street, the fact that the Urban Bar in the same street has attracted Licence Reviews and official records of infractions of its Licence and its Conditions, and created anti-social behaviour in the immediate area, may give pause for thought about how appropriate it is for this sub-committee of Limehouse Community Forum to be awarded continuing, extended powers.
26	Individual Response (25/01/21)	Negative	<p>I have recently become aware of the above neighbourhood planning forum and Limehouse community forum. I initially thought they were an official body within Tower Hamlets Council.</p> <p>It wasn't until I was looking through their aims and plans that I realised they were a small independent committee, supposing to represent local views. I don't feel they represent my feelings and opinions of how</p>

			<p>Limehouse should be managed. I was particularly surprised when I was looking at the names of the people on the committee to find it being chaired by the owner of the Urban Bar that I live near.</p> <p>Having lived in the area for a number of years now, I have had many sleepless nights caused by the noise and other late night activities of this premises over the years.</p> <p>There were 2 license reviews and countless complaints about noise and other ASB breaches. That plus the other points I've mentioned wouldn't give me the confidence to support or endorse this particular group.</p>
27	Individual Response (25/01/21)	Negative	<p>I understand the LCF is applying to be re-designated the Neighbourhood Planning Forum for Limehouse and want to make clear my strong objections to this for the following reasons:</p> <ul style="list-style-type: none"> - LCF is not interested in being organised to promote or partake in neighbourhood planning matters. I have been part of LCF since 2018 and have not received any communication regarding this, yet receive multiple emails on their other events such as LIMEFest. There is a material amount of development going on in Limehouse and for this to be the case is unacceptable. - LCF does not have a diverse membership. The organisation is focussed around the marina area and Narrow St area as demonstrated by the list of members in the application form. It is not inclusive to north and central Limehouse and the Bangladeshi communities. - If the NPF is part of LCF, you therefore you need to become a member of LCF to be involved with the NPF. NPF should be separate to allow people who are interested in the NPF to take part without needing to commit to or be accountable to LCF which, when considering the point above, is not representative of the area. - In the application for re-designation, LCF <ul style="list-style-type: none"> o In 1a does not provide any plans but repeats events that have been run that are completely unrelated to the NPF

			<p>o In 1b does not provide any specific Neighbourhood Plan commentary, despite that this is something that should have been developed over the past 5 years</p> <p>o In 2 refers to events that are unrelated to the NPF and as per my points above highlights the LCF's lack of interest in promoting the NPF</p> <p>I joined the NPF through the LCF in 2018 with my husband and was extremely disappointed by the minimal focus designated by LCF on this. LCF does clearly bring a number of benefits to the community through the successful events they run however the lack inclusion of the whole Limehouse community and poor execution of an effective NPF stands out.</p> <p>Other local groups should have the opportunity to apply for recognition as the designated forum on this basis.</p>
28	Individual Response (25/01/21)	Negative	<p>I'm writing to express my grave concern regarding the executive of the Lighthouse Community Forum. I do not believe that this group as currently constituted, represents me or the people of Limehouse.</p> <p>I am a regular member of LCF for many years but have not been consulted at all since at least 2019 on contributing to the non existent neighbourhood plan. We have had no meetings of any sort for over a year. No one has even seen this Plan in either draft or final form. I have requested that meetings be held on zoom but none have happened. The last meeting of LCF was 4/12/19. No meetings, consultations, drafts of the neighbourhood plan or opportunities to participate in creating or developing the plan have been forthcoming since that time.</p> <p>However in the meeting of 4/12/19 it was minuted:</p> <p>"LC explained that consultants, funded by a Locality grant, had been appointed to assist LCF to prepare the Neighbourhood Plan. Workshops had taken place and a draft Plan would be prepared for consultation with the Limehouse community."</p> <p>But local members and residents have heard nothing since that time (or before - no Plan has ever been presented) and have been given no voice in the Plan whatsoever. We have no knowledge of the work done by</p>

			<p>the consultants. So a grant - from the Council? - has been used but nothing has been produced as a result? Is that correct?</p> <p>The people named on the document for redesignation submitted to you have no knowledge that their names are being included. For example, rector Richard Bray was unaware of this action by the executive and had not even been asked for permission to include his name.</p> <p>There was to be an emergency general meeting in December 2019 to determine the nature of the Constitution – this was cancelled at no notice and with no grounds for cancellation by the executive. The new constitution gave much wider and longer lasting powers to the executive and in particular the Chair. A large number of LCF members including myself were greatly concerned by this and contacted our local Councillor.</p> <p>There are local groups that would be very interested in contributing to a Neighbourhood Plan- who have not been invited to do so. Better St for Tower Hamlets, Tower Hamlets Wheelers, living streets, friends of the Earth, to name a few- all with members who live and work in Limehouse. All of these groups have continued to meet through the pandemic - why not LCF? We have local LCF members with a huge knowledge of civil engineering who have not been included in the redesignation document or invited to take part. It's also disappointing that the only faith group to be represented is the C of E when we are a very diverse community. I have put in several written requests to see the accounts of Limehouse Community Forum – and not been answered. I have concerns regarding conflict of interest with members of the executive, but I've not been able to investigate as information is being withheld. Accounts have not been available for years.</p> <p>LCF wants to give the impression members come to tri monthly meetings and met 3 times last year to look at the neighbourhood plan. This is a complete fiction as their own website shows- there are no minutes after 2019.</p> <p>There is no "Plan Making Team". There has been no opportunity for ordinary members of LCF - let alone the wider community- to join this team - to look at drafts, discuss, amend or contribute in any way. My understanding from the application document is a very small group- possibly just the executive of LCF - is the "Plan Making Team". No other member has been given a democratic opportunity to join or contribute at all on</p>
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			<p>the Neighbourhood Plan since before December 2019.</p> <p>As a resident, a sustainable travel activist and chair of a London charity I would be very interested in contributing to the neighbourhood plan but my participation - and that of all Limehouse- has been blocked by the executive of the LCF. They do not represent me, ordinary LCF members or the wider community.</p> <p>For further consideration:</p> <p><i>1b "We accept that the Neighbourhood Plan which LCF is developing should be complementary to this document. Accordingly we have developed policies relating to the design, sustainability, location and environmental impact of any development planned for the ward. The membership of LCF considers that there is limited scope for large scale development and this is reflected in the plan as local adoption of the core policy document occurs".</i></p> <p>Reads as if there is already a plan and members have been consulted. There isn't a plan and they haven't been consulted.</p> <p><i>2a " The LCF has met at least tri-monthly for the past thirteen years" -</i></p> <p>False. LCF has not met at all since the meeting of December 2019.</p> <p><i>3b " As outlined above we continue to be diligent in our attempts to include everyone as members and to keep them informed about plans for the Neighbourhood Area and the creation of a Neighbourhood Plan. ."</i></p> <p>False. no-one has been involved, kept informed from December 2019 onwards, and no Plan has been created or shared with the membership over many years.</p> <p><i>4b." We believe the constitution has been developed in the correct fashion, "</i></p> <p>False. The new constitution was pushed through and the normal processes going back many years whereby issues are debated face- to face at meetings (or later by Zoom) were bypassed. An emergency General Meeting to discuss concerns with the new constitution was cancelled with zero notice and no grounds for cancellation. Instead the chair set up an online vote without allowing opponents to explain their concerns. Many residents voiced their concerns about this process with Cllr James King.</p>
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29	Individual Response (26/01/21)	Negative	<p>Three reasons for my objection to Limehouse Community Planning Forum re-application</p> <ul style="list-style-type: none"> · The forum's approach to what constitutes, and who constitutes, Limehouse focuses exclusively on the area south of commercial road. The wider limehouse community needs a more representative group and designation area to support equitable change in the neighbourhood. · The forum has made no meaningful attempt to engage the wider limehouse community and have not built any meaningful relationships with the communities north of commercial road since being designated in 2016. · The forum's emphasis on 'community safety' focused on policing and surveillance and its lack of concern for housing is worrying. When policing is held up as the primary solution to creating safety in a neighbourhood it closes off discussion as to what other things create a liveable neighbourhood.
30	Individual Response (26/01/21)	Negative	<p>I am writing to express my concerns at the renewal application of the Limehouse Community Forum to be the designated planning forum for Limehouse.</p> <p>The LCF does many good things as a community group, but it has not produced a neighbourhood plan in five years of office.</p> <p>The LCF also appears unrepresentative of the whole population of Limehouse. It has failed to recognise the concerns of east Limehouse residents in particular, where recent planning applications have impacted their lives.</p> <p>Accordingly, I do not support the LCF's application for redesignation.</p>
31	Reverend Richard Bray (26/01/21)	Positive	<p>Thanks for getting in touch with me. I am indeed a member of Limehouse Community Forum (and have been for a number of years).</p>

			<p>I realise that some people are unhappy about the direction of LCF, but when I was canvassed on the subject yesterday I pointed out that there was a free and fair election last year, overseen by Rev Roger Preece, which was won by the longstanding chair. I did say I didn't recall being informed that my name would be on the application for re-accreditation for the neighbourhood planning forum, but also that I had no objection to my name being included and that I would not be asking for my name to be withdrawn. I support the re-accreditation of LCF.</p>
32	Individual Response (26/01/21)	Negative	<p>I work in Limehouse and have been informed that Limehouse Community Forum are applying to become a Neighbourhood Forum.</p> <p>Whilst I appreciate that this mechanism could be extremely useful in Limehouse, it absolutely must be inclusive and encompass the true nature of the area. The proposal covers a small area and excludes vast, less affluent, parts of the community in Limehouse.</p> <p>The proposed area does include the Roche Estate, but no residents from the estate appear to be members. Barriers to participate clearly need to be addressed even within the boundaries of a smaller, more affluent section of Limehouse.</p> <p>I feel that any Neighbourhood Forum should have both of these considerations revised to ensure even and good growth in Tower Hamlets.</p>
33	Individual Response (26/01/21)	Negative	<p>I write in objection to the Limehouse Community Forum's application for re-designation as a Neighbourhood Planning Forum.</p> <p>At a time of enormous change to our cities and communities wracked by the carnage of COVID and its long term consequences, never has it been more vital to plan the future with a determination to improve the lives of all our residents.</p> <p>LCF have shown little interest in these matters during the past few years and the prospect of them rising to meet the fresh challenges with the enthusiasm or vigour needed fills me with dread.</p>

			<p>It is a time of change for all, more focussed thinking, clarity of thought and a team with a vision to pressure and help plan a way forward for Limehouse and our neighbours.</p> <p>Importantly it is also a time of opportunity, the chance to pick up the pieces, look forwards and enhance the needs and aspirations of all.</p>
34	Individual Response (26/01/21)	Negative	<p>I am writing to Object to the application for re-designation of the (LCF) Limehouse Community Forum as a Neighbourhood Planning Forum</p> <p>I was raised within the Borough of Tower Hamlets and come from an BAME background, have been living within Limehouse for the past 28 Years,</p> <p>Have had experience as a member, as well as working within the “LCF” Limehouse Community Forum. All members get regular email from the forum, the most recent email sent to all members urging them to write to you in support of its application. “which this is not”</p> <p>The Limehouse Community Forum “LCF” membership is not representative of the people who live in Limehouse. The forum only represents people at the top end of Narrow Street, there is NO local representation.</p> <p>Membership to the LCF is restricted, Limehouse residents are not automatically “LCF” members <u>and they must first apply and then be approved by the Chair and his Executives.</u></p> <p>The Chair of “LCF” The Limehouse Community Forum is not and has never been part of this great community of Tower Hamlets or Limehouse, he and his wife are registered in Orpington and have been registered there ever since the day I meet them, which is now more than 30 years ago.</p>

			The Only thing the “LCF” Limehouse Community Forum can do with lots of financial mishaps, is open and close the Lime Fest, which in turn doesn’t even represent the community, it's an event for the Chair and his Executives.
35	Individual Response (26/01/21)	Negative	<p>I have no doubt that you will have already received objections far more detailed than this one, but I want to raise a concern about the amount of time that LCF Chair Mr Mark Slankard spends in Limehouse.</p> <p>He is an American, who spends the winter months in Florida. His main Uk residence is not in Limehouse, and his pub business on 27 Three Colt Street, Limehouse is closed. I hear for good, although I admit that may be hearsay. His links to Limehouse therefore seem somewhat tenuous to me and I think that we need someone leading the planning forum for Limehouse who has more of a stake in the ward than that.</p> <p>I know that there has been no delivery of a neighbourhood plan and I have seen no evidence of any work on this throughout the whole of 2020. I would not accept that the Covid crisis prevented progress on this plan either, it is mainly desk based work and they have had five years to do it.</p> <p>Therefore, I do not think the LCF is a suitable group to be the designated planning forum for Limehouse. My impression is that Mr Slankard is only interested in the badge of recognition by the local authority to serve his other interests.</p>
36	Individual Response (26/01/21)	Positive	Please may I register my support for the proposed Limehouse Neighbourhood Plan for 2021.
37	Individual Response (27/01/21)	Negative	<p>I wish to highlight my reservations regarding the application by the Limehouse Community Forum to be renewed as the designated planning forum for the Limehouse area.</p> <p>The LCF operates as a community group, but to my knowledge it has not produced a broader plan for the neighbourhood, certainly not within recent years. Despite offering value in some specific areas, I'm not confident the group would be capable of successfully implementing a properly balanced and holistic approach to the environmental, social, housing, retail and other needs of the area.</p>

			<p>All key decisions, such as planning applications, should be viewed through such a lens, but for example the recent planning applications to the east of Limehouse were not objected to by the LCF, despite strong feelings against from many of the residents in the area. This also indicates the LCF is not being fully representative of the whole ward.</p> <p>With these concerns I do not believe the LCF is well placed to operate as the forum for neighbourhood planning and accordingly object to their application for redesignation.</p>
38	Individual Response (27/01/21)	Negative	<p>As someone who as lived and worked in the area for over 15 years I admire someone trying to improve the local area however I have objections to the above application.</p> <p>I feel that the LCP's designation area is largely exclusionary of the Limehouse area and it's community as a whole. Their boundaries seem to concentrate purely on the more affluent areas based around the Marina and Newell St and completely exclude surrounding communities.</p> <p>In my many years in the local community I have seen no meaningful attempt to engage local communities or residents. Infact, very few of those I interact with, have very little to no knowledge of the organisation.</p> <p>I also find their view that increased policing and surveillance is the solution to crime, problematic. Research has shown that these methods are unfairly biased against those from black and ethnic minorities and can lead to even more divisive areas.</p> <p>I also find their membership is lacking representation in terms of race and class. We cannot start to build a better, safer Limehouse, until we are willing to fairly listen and build relationships to those living and working in the area with an equal voice for all.</p>

Annex 2: Content of 'Statement of Evidence – Management of the Limehouse Community Forum – May 2020'

[This document was submitted to the Council on 21 January 2021, as part of a representation included in the table above. The document was signed by five 'concerned LCF members'. Referenced appendices have been provided to the Council, but are not reproduced here for reasons of space.]

EXECUTIVE SUMMARY

This Statement provides evidence that the current Limehouse Community Forum (LCF) Chair Mark Slankard and other Officers of the LCF have behaved unconstitutionally, without transparency and in a generally improper manner. Their actions are not only unreasonable and often dubious, but they impact on those prepared to give their time to the LCF. The members who have produced this Statement have served either as LCF Officers or for some time as active members. Whilst the problems are long-standing, for brevity the Statement only covers the year prior to an Annual General Meeting postponed in January 2020 and an online election in April 2020.

One of many issues of concern stemmed from the decision in January 2019 to update the LCF 2015 Constitution. A working group, including a recently elected Officer as LCF Secretary, produced a draft revision. The draft was unilaterally dismissed by Mark Slankard and the group disbanded. Mark Slankard announced he would be producing a new Constitution himself. This caused discord between the Chair and the members of the working group. In response, Mark Slankard, in a later meeting, forced through a change to the existing Constitution to make it easier for an Officer, such as the Secretary, to be removed. He forced through this amendment with a threat of closing down the LCF if it were not adopted. The effect of this action was to force the Secretary to resign.

In January 2020, a long-standing and active member of LCF – Geoff Sumnall, applied to run for election as LCF Chair. Mark Slankard initially tried to prevent this application quoting false conditions of the LCF 2015 Constitution. When this failed, Mark Slankard then had his Officers and those he termed the "Executive", agree to postpone the AGM and Chair election until a new Constitution had been ratified. The reason given was that the existing 2015 Constitution was not "lawful". This was untrue as the Constitution was ratified by members in 2015 and subsequently approved by LBTH for LCF to become a designated Neighbourhood Planning Forum.

After a two month delay, to impose an unnecessary and dubious Constitution with unconstitutional voting processes, an online election for Chair was finally held on April 1st. No online voting process had been approved by members prior to these events. Some eligible members did not have access to online voting and were prevented from casting their vote. There was no independent Returning Officer appointed and the process of validating the eligibility of votes cast fell to the two LCF Vice Chairs.

Not only did the Vice Chairs support Mark Slankard but there was no access to the same information, for Geoff Sumnall's team. An independent Adjudicator was appointed to oversee and verify the results of the votes. However, during the voting process the Vice Chairs had the ability to witness and control the voting, outside adjudication. This puts the election result in serious doubt. Not only must the actions of the LCF, a group who have received financial support from LBTH and others, be reputable but they must be seen to be

reputable. When these actions are unreasonable, dubious and sometimes dishonest, those who support the LCF should be made aware of these issues.

The concerned members have produced this Statement as they feel the actions described should be brought to the attention of those who support the LCF, and those whom the LCF claims to represent.

1 . INTRODUCTION

1.01 The purpose of this Statement is to describe the actions of the Chair and Officers of the LCF since January 2019, leading to Mark Slankard's disputed re- election which was announced on 15th April 2020. Evidence will be presented which will show **Mark Slankard, with Officer support, at times acted unreasonably, without transparency, contrary to the LCF Constitution and dishonestly. The Statement will show in bold where and why each of these actions is believed to have occurred.**

1.02 The Statement has been produced by five concerned members of the LCF who have detailed knowledge of events and documentation surrounding the actions in question. Three have served as Officers, and a fourth has been an active LCF member since shortly after its inception. Views have been taken of many other members, past and present, many of whom are dissatisfied with how the LCF is run. This greatly inhibits the issues the LCF is able to address and could explain why generally there are approximately 12 active members from about 700 registered members. This Statement, however, will only cover the aspects mentioned above in paragraph 1.01.

1.03 Whilst problems have existed for some considerable time, for brevity the Statement will deal only with:

- the year preceding a postponed AGM in January 2020 when the Officer elections would have been held,
- the events surrounding that postponed AGM,
- a cancelled EGM in March 2020 when an election could have been held,
- an online vote for a new Constitution; and,
- an online election in April 2020.

1.04 Where particularly relevant, LCF notices, meeting minutes and member letters are included as appendices, and the Statement is summarised in Section 7 Conclusions below.

2 . EVENTS PRIOR TO AGM JANUARY 2020

2.01. The LCF was established in 2006 and Mark Slankard was elected Chair in the following year, where he has since remained. The other Officers have changed from time to time in accordance with the LCF Constitution in force. The Constitution current in January 2020 was adopted by Members in 2015 and approved by LBTH that same year, when the LCF was designated as a Neighbourhood Planning Forum.

2.02 At the 29th January 2019 AGM it was agreed that the 2015 Constitution was in need of updating. The main concerns were to better define those who could vote on matters of principle, to update the names of the sub-committees and to agree a process for removing members if necessary. An official Working Group was set up to revise the 2015 Constitution.

James Mack, who had just been elected as an Officer and LCF Secretary, was included in this working group of five, chaired by Mark Slankard.

2.03 The Constitution Working Group met on several occasions but, as Mark Slankard spent most of that time abroad, the group was effectively chaired by James Mack. The draft for members approval was completed and forwarded to the LCF Officers for review on 30th April 2019. It was rejected by Mark Slankard, stating that it was 'inappropriate for a Neighbourhood Planning group'. Under protest from James Mack, **the Working Group was disbanded by Mark Slankard who advised he would produce an alternative Constitution. This action was considered unreasonable given the time spent by the Working Group and disregard for the considerable involvement of James Mack.**

2.04 At the end of the General Meeting on 10th April 2019, under Any Other Business, an **unannounced amendment** to the Constitution was read out by Mark Slankard which would give power to the LCF Officers to remove a fellow Officer by majority agreement of members. This appeared to apply directly to James Mack following his objections to the disbanding of the Constitution Working Group. Members had not received any prior notice of this amendment and were not allowed to read the motion before being asked to vote on it. **Mark Slankard informed the meeting that he would 'shut down the LCF, cancel History Night and cancel LIMFest, unless this amendment is passed now'. The manner in which the motion was raised and carried was both unreasonable and unconstitutional.** The motion was carried (Appendix A).

2.05 James Mack resigned from the LCF on 9th May 2019 (Appendix B).

2.06 At the 4 th December 2019 LCF General Meeting , **Mark Slankard proposed a motion that a new Constitution be adopted on the night, despite the fact that it had only been posted on the LCF web site 2 days earlier (Appendix C).** Members did not accept this motion as there was no time for consultation and approval as required by the existing 2015 Constitution. Some of those who had read the new draft thought it too restrictive for potential LCF members and no longer showed the LCF as member-led. When pressed, Mark Slankard agreed to a period of consultation and said he would respond in due course to comments arising. **This motion to ratify a new Constitution was unreasonable and an attempted breach of the existing 2015 Constitution.**

3. POSTPONED AGM JANUARY 2020

3.01 A LCF notice was sent to all members on 8th January 2020 (Appendix D) indicating that those wishing to stand for Office at the election scheduled for 29th January should apply before 22nd January. Geoff Sumnall duly responded on 15th January to stand for Chair. Geoff Sumnall had lived in Limehouse for 20 years and been a member of LCF since its early days, being closely involved in all its activities. His election manifesto pledged to make the LCF more representative of the Limehouse population and to make it more effective in addressing the many issues it faced.

3.02 On 15 th January 2020 Chair Mark Slankard acknowledged Geoff Sumnall's application but stated that, amongst other objections, self nomination was not allowed and that 28 days notice was required. (Appendix E). A very strange response considering that Mark Slankard did not issue his call for candidates until 21 days before the election. **These statements are also untrue. There was no reference to self nomination or 28 days notice in the 2015**

Constitution which was in force at the time. (Appendix F). Geoff Sumnall replied on 15 th January that he believed his application to be valid and wished it to stand.

3.03 On 17 th January, Mark Slankard called a meeting of Officers and 4 other “Executives” to discuss the validity of Geoff Sumnall’s application. There were no minutes taken at this meeting but from witness accounts a decision could not be reached and the Digital Team Officer, Charlie Hughes, was asked to enquire of Geoff Sumnall if he could “find a way to avoid a divisive and potentially acrimonious election”. On questioning, Geoff Sumnall advised that for some time he had been unable to reach agreement with Mark Slankard on how the LCF should be run and wished his application as Chair to stand based on his manifesto. On reporting this, Charlie Hughes was requested, by Vice Chair Helen Kenny, to prepare an election process.

3.04 On 27 th January a further meeting, chaired by Mark Slankard, took place between the Officers and “Executives” to discuss the election process. From the witness account of Charlie Hughes, Mark Slankard stated he “would not be subjected to a debate with Geoff Sumnall and a contested vote at the imminent AGM”. **Mark Slankard further stated, “The 2015 Constitution would not allow a lawful election”. This statement is untrue, as the LCF had been using the same 2015 Constitution for Officer elections since 2015 (Appendix F).** To compound the deception, the use of the word “lawful” instead of “not consistent with the Constitution” suggested the election would not be legal. This is not true, LCF is unincorporated and therefore not subject to company law. However, on this basis a notice was given to LCF members on 28th January that the AGM and election scheduled for 29th January was cancelled.

3.05 Charlie Hughes, Digital Team Officer, was given the task of communicating to LCF members the decision to cancel the AGM and election. He resigned immediately afterwards in protest to the manner in which that decision came about. (Appendix G)

3.06 On 28 th January, a notice from “LCF Executive” was issued stating the AGM scheduled for the 29 th January was cancelled. (Appendix H) **The reason given was that the LCF “does not have a current ratified Constitution.” This statement is untrue, as this was the then current Constitution, approved by LBTH, as part of its designation of the LCF as a Neighbourhood Planning Forum.** The LCF notice also stated that an EGM was to be held 4 th March primarily to ratify a new Constitution, with the cancelled AGM to now be held to 8 th April.

3.07 With regard to the above notice on 28 th January, there is no reference to the term “LCF Executive” in the existing 2015 Constitution nor has there ever been any approval from LCF members as to who are, or what status is held by, members of the “LCF Executive”. It is of concern that Mark Slankard uses “Executives” to give support to decisions, as in the AGM cancellation above, and false credence to outgoing notices. **The use of the term “LCF Executive”, and to those given that status, is contrary to the 2015 Constitution.**

3.08 A meeting was still held by members on 29 th January at which a decision was voted on to write to the LCF Officers objecting to the AGM postponement and requesting the Officer elections take place at the scheduled EGM on 4 th March. An email stating this request was duly sent to LCF Officers on 9 th February on which 32 members agreed to have their names included in support. No response from the LCF Officers was received. **Not to respond to a letter of objection from so many concerned members is unreasonable behavior by the Chair and Officers and a dereliction of duties.**

4. EGM 4th MARCH 2020

4.01 On 13th February Mark Slankard sent an email to LCF members advising that an EGM was to be held on 4th March 2020 to ratify his proposed Constitution (Appendix I). His email referred to the postponed AGM and elections as being provisionally set for April once a “lawful Constitution” was ratified. **This statement therefore repeats the false claim that the existing 2015 Constitution was unlawful and advises that unless the new Constitution is ratified, members will be denied the choice of new Officers. Such a proposition is unreasonable, contrary to the 2015 Constitution, and dishonest.**

4.02 Further to the email sent to LCF Officers on 9th January on behalf of 32 named members, requesting Officer elections take place at the scheduled EGM on 4th March, a formal notice was sent to LCF Officers on 25th February in accordance with the 2015 Constitution, as follows:

George Korchinsky wrote:

Pursuant to Section 7.6 of the LCF Constitution, we provide notice that the following resolution is to be added to the agenda, to be voted on at the EGM:

“In accordance with Section 4.9 of the LCF Constitution, the following elections are to take place at this EGM:

- Chair
- Vice Chair
- Treasurer
- Secretary”

4.03 On 4th March, the day of the scheduled EGM, members arriving at the notified venue, The Barley Mow Veterans Club, were met by Vice Chair Helen Kenny. She informed members she was not aware of any meeting taking place and that she was only there to take votes on the proposed Constitution. Having experienced the abrupt cancellation of January’s scheduled AGM, the precaution had been taken by Catherine Gilson of booking the nearby Barley Mow Residents Room to enable the scheduled EGM to take place. Helen Kenny was invited to attend but she declined.

4.04 The 4th March EGM was then held with 32 members in attendance (Appendix J). Since there were no Officers present, a motion was put forward and seconded for George Korchinsky to be appointed as Chair for this meeting. It was agreed that there were 2 main items to be covered: the election of Chair and the acceptance of the proposed Constitution. **The first motion of the night was to declare the meeting as a bone fide LCF member meeting and it was passed unanimously.**

i) Chair Election: As Mark Slankard was the only candidate not present, the involvement of Geoff Sumnall was restricted. There was an open and lively debate and support for both candidates. Many members contributed with differing views, all covered in some detail in the minutes. (See Appendix J). When voting took place, the results were:

Geoff Sumnall – 29
Mark Slankard – 0
Abstentions – 1

ii) Proposed Constitution: There were concerns over how the Constitution issue was being covered and the delays it was causing. Since there were differing views on the proposed Constitution, the general feeling was that any vote on modifying and/or ratifying the proposed Constitution should be taken once the election of the new Chair was ratified. A motion was presented for a deferment and the results were:

In favour – 19

Against – 1

Abstentions – 12

5. NEW CONSTITUTION MARCH 2020

5.01 Paragraph 4.01 above deals with the notice sent out on 13th February for an EGM to be held on 4th March. Chapter 4 then deals with the meeting on 4th March which took place when the EGM was ignored on the day. Chapter 5 deals with the proposed Constitution which the scheduled EGM was meant to cover.

5.02 On 24th February a further notice of the 4th March EGM was sent from the LCF Officers to members to ratify the constitution. It also invited them to vote online for the proposed Constitution. **The notice to vote online was in contradiction to the existing 2015 Constitution which states, (Appendix F), that constitutional amendments could only be voted on by a show of hands.** No arrangements had been proposed and approved by members on how an online vote should take place and be scrutinised. In addition some LCF members do not have access to online voting. N.B. The restrictions on public meetings due to the Coronavirus pandemic did not come into force until 23rd March.

5.03 On the 12th March 2020 a notice from the “LCF Executive” was sent out with the Constitution voting results (Appendix K). **It states that ratification was held on 4th March** and an independent Adjudicator had verified the results and process. **This is a false statement as the EGM advertised for that purpose did not take place at all.** The 32 members, who attended the alternative meeting which was arranged on the night, voted for a deferment of the Constitution change until after the Chair election had been ratified. (see paragraph 4.04 ii).

5.04 The Adjudicator’s statement of 18th March 2020 provided no clarity on the key questions of:

- who was invited to vote,
- their eligibility to vote and
- what the process was for verifying that votes counted were from eligible members.

Therefore the outcome could not be relied upon. The Adjudicator’s report contained a statement that LCF Members had voted in December 2019 to hold an online vote on the new Constitution. This statement, which can only have originated from an LCF Officer , was untrue. (Appendix C)

6. AGM APRIL 2020

6.01 On 22nd March Mark Slankard sent members a 4-page email covering various notices from other organisations on the coronavirus pandemic. (Appendix L). At the end of the email was a notice entitled AMENDED SCHEDULE OF LCF EVENTS stating that due to the pandemic,

the election for Chair would now be entirely online. Registered eligible members would receive ballots before 1 April 2020. Candidates were to submit written statements by 31st March. No ballots were subsequently sent, and no online voting arrangements had been proposed and approved by members, prior to this notice. There was also no description of how the online vote would take place and be scrutinised. Some people, eligible to be members, do not have access to online voting. **This election process was unreasonable, poorly executed and produced many errors that call the result into question.**

6.02 On the 27th March the prospective Chair, Geoff Sumnall, commenced an exchange of emails with LCF Officers aimed at agreeing a fair and democratic election process (Appendix M). This may be summarised in one of his letters as, "I would wish this process to be on the basis of two requirements. That the details of those who are asked to vote are made known to us and verified beforehand; and that those who do vote, and for whom, are certified by an independent person."

6.03 During this exchange of emails concerns were raised by Geoff Sumnall's team to LCF Officers and the Adjudicator on:

- which members were contacted and validated prior to adjudication,
- why no independent Returning Officer was appointed,
- why LCF registration is a precondition of voting since this provision excluded some eligible voters unable to register for technical reasons,
- the serious design weaknesses in the voting mechanism and,
- the inadequate period given for voters to absorb candidates details, raise questions, understand the voting procedure and cast their vote.

CONCLUSION: The Chair election process was unfair, unsound and undemocratic. (Appendix N)

6.04 Geoff Sumnall and his support team requested access to the voting process, as the Adjudicator had suggested. This request was denied. **It is unreasonable for the incumbent's team to have the ability to witness and control the voting, outside adjudication, as this puts the election result in doubt. Not only must the process be fair, it must be seen to be fair.** Geoff Sumnall closed his emails, to LCF Officers on 7th April, requesting a fair election process with "Should you still feel unable to comply with this reasonable request, then my position is that I will continue not to accept this election process and I will raise the issue with LBTH".

7. CONCLUSION

The conclusion of this Statement is that the LCF Officers, and its Chair Mark Slankard in particular, do not consistently act in the best interests of Limehouse. The specific evidence shows that during the periods considered, Mark Slankard, with Officer support, has acted unreasonably, without transparency, contrary to the LCF Constitution and dishonestly. We believe that this was done in order to secure his reelection and to maintain the status quo of his Officer Team.

Annex 3: Responses Received After Close of Consultation (5pm 27/01/21)

Reference	Respondent	Status	Comments
39	Individual Response (27/01/21)	Concerned	<p>Thank you for the opportunity to respond to this application. I appreciate the work that's gone into this application; however I am writing as an individual with some concerns.</p> <p>The neighbourhood designation area which form's the basis of the application does not reflect the wider Limehouse community. It focuses exclusively on the area south of commercial road, hence the application's claim that 73% of the neighbourhood is employed (1st in Tower Hamlets). North of Commercial Road there is a higher than average proportion of residents in Limehouse who are long term unemployed in a borough with the highest unemployment and poverty rates in London. In the context of the pandemic and the economic impact it brings the wider Limehouse area would benefit from a more representative designation area and subsequently a more representative group. It would be beneficial for the future of Limehouse to see meaningful relationships built across both sides of Commercial Road to pursue equitable and sustainable changes.</p>
40	Individual Response (27/01/21)	Negative	<p>I am writing to object to Limehouse Community Forum's proposed re-designation as a neighbourhood forum. I would like to raise with you my very grave concerns of un-democratic behaviour, lack of accountability, bad governance, and a closed, exclusive cabal of individuals led by Mark Slankard that actively discourages community cohesion, and has racist views.</p> <p>I am concerned by the complete lack of democratic process taking place in the LCF and complete lack of accountability. There may be collusion, conflict of interest and misappropriation of public funds.</p> <p>I was concerned when the 2019 AGM was cancelled with less than 24 hours notice with a spurious reason of the current constitution being deemed unlawful by Tower Hamlets Council. A misleading untruth as the current Constitution stands. An EGM was then planned by the committee, publicised on the LCF website and residents notified by email. Over 30 residents turned up for the meeting with many there to object to a draft constitution only to discover there To be no meeting and the Vice Chair denying all knowledge of a meeting. Without it there was no discussion, no accountability, no objections could be raised or discussed in a</p>

			<p>democratic manner. All democratic processes were removed. LCF gave the option of an online yes/no vote to pass a flawed constitution that handed complete power and control to the Chair - Mark Slankard. There was no forum for any amendment to be tabled. I would have put forward an amendment to limit the term of any one chair in power. The President of the United States has more checks and a limit on his term than the chair of LCF. This is un-democratic.</p> <p>I am gravely concerned that these meetings being cancelled meant there was no democratic process and no accountability of LCF in 2019. And absolutely none during 2020. All governance disappeared in 2020. I feel residents have been stonewalled and all democratic processes abandoned. There is no transparency in the way LCF is run and anyone with a voice who raises concerns is silenced, ridiculed, side lined or removed from communication.</p> <p>As a long standing and concerned resident, I have noticed a change in normal governance and operating procedures which are unexplained and nefarious. I want to bring this to your attention as the relevant local authority to either:</p> <ul style="list-style-type: none">A) investigate your own legal position as to your responsibilities regarding potential misappropriation of public funds within your jurisdiction orB) nominate a point of contact with whom the metropolitan police can liaise when and if an allegation of suspected Misuse of public funds is made in due course. <p>In my view, any democratic institution that permits autocracy is complicit.</p> <p>Despite repeated requests for financial documents to show the governance of LCF, none have been shared in at least 5 years. Finances are not presented at AGMs nor are they published on the LCF website.</p> <p>In addition to no finance records being shared we have a Chair who is constantly absent and spends more time in America than he does in Limehouse. His repeated absence brings into doubt his ability to be able to represent local residents with any knowledge or care, and I feel there is a complete conflict of interest with his local business. He represents local business not residents.</p>
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			<p>I object to their proposal saying the governance is correct and transparent. It is the opposite.</p> <p>I object to their proposal saying they promote community cohesion and inclusivity. The opposite is true. In planning Limefest one year I raised the issue that their proposed date fell during Ramadan and as we had not gone public with the date then we should change it. Mark Slankard ridiculed my suggestion saying 'if they had organised something on Christmas Day, they wouldn't change the date.' This blatant racism left me stunned and I withdrew from being involved. Someone with these views should not be given any power in Tower Hamlets. Tower Hamlets Council should not allow these racist views to continue. LCF has done nothing to address diversity in the ward. I live in a council block which is a richly diverse and friendly place. This diversity is not reflected in LCF. I was not made to feel welcome at all by the chair of LCF and was belittled if I raised any issue at meetings. Decision making is bullied and forced through and conducted out of meetings. It is outrageous the power the chair and committee has and their conduct is completely at odds with the friendly and inclusive nature of the community. For Tower Hamlets to support their proposal would be a damning vote of confidence to abuse of power, racism, community division and illegality.</p> <p>I hope you consider these points carefully and should you want me to elucidate any of them in more detail, I am happy to be contacted. I love Limehouse, I'm proud to live here and I feel part of a diverse and friendly community. It is sad that LCF is rotten to the core as it does not reflect us at all. I hope you will investigate it fully and hold its governing body to account. It should be disbanded not rewarded with a re-designation as a neighbourhood forum.</p>
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Neighbourhood Planning Forum Refusal Statement

Name of designated neighbourhood planning area: Limehouse Neighbourhood Planning Area

Name of applicant: Limehouse Community Forum

Consultation period: 3 December 2020 to 27 January 2021

Decision

Notice is hereby given that Tower Hamlets Council, pursuant to a decision made on 3 March 2021 by the Mayor in Cabinet, has refused the application to designate the Limehouse Community Forum as the neighbourhood forum for the Limehouse Neighbourhood Planning Area.

In accordance with Section 61F(7)(d) of the Town and Country Planning Act 1990 and the Neighbourhood Planning (General) Regulations 2012, a local authority must give reasons for refusing an application to be designated as a neighbourhood planning forum. These reasons are stated below.

Reasons

A clear majority of the consultation responses received on the proposed forum designation objected or raised concerns about the application – these included concerns about the conduct of members of the forum, about a lack of neighbourhood planning activity from the forum during their previous five-year designation, and about how well the forum represented the wider community of Limehouse.

Given the clear lack of consensus within the community on the designation of the proposed forum, the Council has concluded that:

- Designating the proposed forum would not promote or improve the social, economic, and environmental wellbeing of the neighbourhood planning area (under section 61F(5)(a) of the TCPA 1990); and
- The proposed forum's purpose does not reflect in general terms the character of the neighbourhood planning area (under section 61F(7)(a)(iii) of the TCPA 1990).

Inspection

This refusal statement can be inspected on the Council's neighbourhood planning webpages at https://www.towerhamlets.gov.uk/lgn/planning_and_building_control/planning_policy_guidance/neighbourhood_planning/neighbourhood_planning.aspx. Due to restrictions related to the coronavirus pandemic, a hard copy will not be made available at the Town Hall or in any Idea Stores or libraries in the borough.

For further information, please contact the Strategic Planning team at neighbourhoodplanning@towerhamlets.gov.uk or 020 7364 5009.

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<p>Cabinet</p> <p>3 March 2021</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Ann Sutcliffe, Corporate Director, Place</p>	<p>Classification: Unrestricted</p>
<p>Neighbourhood Planning: Determination of Spitalfields Neighbourhood Forum Application</p>	

Lead Member	Councillor Eve McQuillan, Cabinet Member for Planning and Social Inclusion
Originating Officer(s)	Steven Heywood, Planning Officer
Wards affected	Spitalfields and Banglatown; Weavers
Key Decision?	Yes
Forward Plan Notice Published	2 February 2021
Reason for Key Decision	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
Strategic Plan Priority / Outcome	<p>1. People are aspirational, independent and have equal access to opportunities;</p> <p>2. A borough that our residents are proud of and love to live in</p>

Executive Summary

Neighbourhood forum designations expire five years after they are initially granted. The Spitalfields Neighbourhood Forum designation is therefore due to expire on 5 April 2021. The Forum has submitted an application for the designation to be renewed. This report assesses the application against the relevant legislation and guidance.

Recommendations:

Cabinet is recommended to:

1. Approve the redesignation of the Spitalfields Neighbourhood Forum as the designated neighbourhood forum for the Spitalfields Neighbourhood Planning Area, to come into force on 5 April 2021.
2. Note the specific equalities considerations as set out in Paragraph 7.1.

1. REASONS FOR THE DECISIONS

- 1.1 Tower Hamlets Council has received an application to renew the designation of the Neighbourhood Forum for the Spitalfields Neighbourhood Area.
- 1.2 The Council is required to determine applications for the designation of Neighbourhood Forums in accordance with the Town and County Planning Act 1990 (as amended) ('TCPA 1990') and the Neighbourhood Planning (General) Regulations 2012 ('the 2012 Regulations'). The Government's Planning Practice Guidance ("PPG") on Neighbourhood Planning (Ref ID: 41-021-20140306) also provides guidance on the determination of such applications, which states that the role of the Local Planning Authority (LPA) is to take decisions at key stages in the neighbourhood planning process.
- 1.3 Under the modifications to the 2012 Regulations made by the Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2016, the Council must make a decision on applications for neighbourhood forum designations within 13 weeks of starting a consultation on the application.
- 1.4 Officers have assessed the application against the relevant legislation and guidance and believe that it meets with the requirements for approval. Only a small number of consultation responses were received, and these were all either positive, expressing no objection, or providing no comment. No reasons have been provided in any of the consultation responses to suggest that the application should not be approved. A consultation statement is provided as appendix 5.

2. ALTERNATIVE OPTIONS

- 2.1 An LPA may designate or refuse a Neighbourhood Forum application. Where the LPA is satisfied that a prospective Forum meets the requirements of section 61F of the TCPA 1990, the Forum must be approved. Where the LPA is not satisfied that a prospective Forum meets the said requirements, the LPA may refuse the application and give reasons for the refusal to the prospective Neighbourhood Forum.
- 2.2 An LP may refuse to consider an application for a neighbourhood forum in areas where a neighbourhood forum is already designated. The current neighbourhood forum designation in the Spitalfields neighbourhood Planning Area will expire on 5 April 2020. The Council could therefore refuse to consider this application until such a time as the original designation has expired. However, the neighbourhood forum has submitted their application for re-designation at this time in order to avoid a period where the area has no designated forum. If the application were not considered until the current designation expires, there would be at least a 13 week period with no forum designation, and this would likely coincide with the examination process for the recently submitted Spitalfields Neighbourhood Plan.

3. DETAILS OF THE REPORT

- 3.1 This report provides an overview of the assessment of the Spitalfields Neighbourhood Forum application.
- 3.2 The content of the report is as follows:
- Section 4 provides an introduction to neighbourhood planning
 - Section 5 outlines the relevant legislative framework and guidance
 - Section 6 provides an assessment of the Spitalfields Neighbourhood Forum application

4. INTRODUCTION TO NEIGHBOURHOOD PLANNING: A COMMUNITY-LED PROCESS

- 4.1. The Localism Act 2011 amended the Town and Country Planning Act (TCPA) 1990 to make provision for neighbourhood planning, which gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.
- 4.2. The legislative provisions concerning neighbourhood planning within the TCPA 1990 are supplemented by the Neighbourhood Planning (General) Regulations 2012 (as amended) and the Neighbourhood Planning (Referendum) Regulations 2012. Planning Practice Guidance issued by the Secretary of State for Communities and Local Government provides detailed advice relating to the neighbourhood planning system, addressing the key stages of decision-making including the designation of Neighbourhood Areas.
- 4.3. Neighbourhood planning provides communities with the ability to prepare a Neighbourhood Development Plan (NDP) and/or Neighbourhood Development Orders (NDO), in Neighbourhood Areas designated by the LPA on application. Neighbourhood planning powers may only be exercised by bodies authorised by the legislation. In a Neighbourhood Area where there is a parish council, only a parish council may make proposals for a NDP or NDO. In Neighbourhood Areas without a parish council, only a body designated by the LPA as a Neighbourhood Forum may bring forward proposals. A Neighbourhood Forum designation expires 5 years after it is made. A Forum can apply for redesignation. If the LPA considers the Forum to no longer meet the required criteria, the LPA can withdraw designation.
- 4.4. NDPs set out policies in relation to the development and use of land in all or part of a defined Neighbourhood Area and may include site allocations, or development principles for allocated sites. They may also include character appraisals and seek to establish community facilities and/or identify areas for public realm improvements. NDOs allow for planning permission to be granted

in the circumstances specified and exempt certain types of development, or development in certain areas, or on particular sites, from the usual requirement to apply to the LPA for a grant of planning permission.

- 4.5. Both NDPs and NDOs need to be in general conformity with the strategic policies of the Council's Development Plan: the Tower Hamlets Local Plan (2020) and the London Plan (2016).
- 4.6. An NDP that has been 'made' in accordance with the relevant legislative provisions forms part of the Council's statutory Development Plan and, as such, will be accorded full weight when determining planning applications. NDPs will form a new spatial layer to the Council's planning policy and guidance.
- 4.7. NDP policies will be developed by a Neighbourhood Forum through consultation with stakeholders in their relevant Neighbourhood Area and through engagement with Council Officers. Proposed NDP policies must be supported by an up-to-date evidence base to ensure that they are reasonable, sound and justified. Before the NDP is 'made' it must be subject to pre-submission publicity and consultation, submitted to the LPA for a legal compliance check, publicised for consultation, submitted for independent examination, found by the independent examiner to meet the basic conditions specified in the legislation, and passed at a referendum. Following the Neighbourhood Planning Act 2016, an NDP must be given some weight in determining planning applications once it has passed examination – even before it has passed at a referendum.

Community Infrastructure Levy

- 4.8. The Community Infrastructure Levy Regulations 2010, as amended by the Community Infrastructure Levy (Amendment) Regulations 2013 ('the CIL Regulations') were supplemented by the Government's online PPG on 6 March 2014.
- 4.9. The CIL Regulations, as explained by the PPG, make provision for how CIL receipts may be used in relation to neighbourhood planning in those areas which have Parish Councils and those which do not. Tower Hamlets currently does not have any Parish Councils and, as such, the Council retains the revenue generated by CIL. A community governance review was held in 2019 to determine whether a parish council should be established for the Spitalfields area. On 17 July 2019, the Council agreed that there should be no change to existing community governance arrangements.
- 4.10. The Community Infrastructure Levy PPG states (at paragraph 145) that in areas where there is a 'made' NDP or NDO in place, 25% of CIL collected in the neighbourhood area should be spent in that area. Where there is a parish council in place, the money should be passed to the parish council for them to spend directly. Paragraph 146 states that "if there is no parish or town council, the charging authority will retain the levy receipts but should engage with the

communities where development has taken place and agree with them how best to spend the neighbourhood funding”.

- 4.11. Therefore, where an NDP or NDO has been adopted, the Council is required to consult with the local community as to how this 25% proportion of CIL receipts will be spent. Irrespective of this regulation, the Cabinet in December 2016, agreed to undertake this for all areas of the borough whether or not an NDP or NDO has been adopted.

Overview of Neighbourhood Planning at LBTH

- 4.12. The determination of applications to designate Neighbourhood Areas and Neighbourhood Forums are decisions exercised by the Mayor of Tower Hamlets. Such applications are required by the Council to be submitted using the Council’s neighbourhood planning application forms.
- 4.13. The Council has published guidance to assist prospective Neighbourhood Forums to understand what is involved in becoming a Forum and designating an area and the criteria the Council use to make decisions. This guidance advises prospective Forums to liaise with officers prior to applications being submitted. This allows those proposing to make neighbourhood planning obligations to meet relevant legislative requirements.

5. NEIGHBOURHOOD DEVELOPMENT PLANS: RELEVANT LEGISLATION AND GUIDANCE

- 5.1. This section outlines the relevant legislative framework and guidance as they relate to the submission and consideration of applications for neighbourhood planning forums.
- 5.2. The Council has a statutory duty to determine applications to designate Neighbourhood Forums in accordance with the relevant legislation: TCPA 1990 Section 61F and the Neighbourhood Planning (General) Regulations 2012.
- 5.3. Regulation 8 of the 2012 Regulations specifies the criteria that:

Where an organisation or body submits a neighbourhood forum application to the local planning authority it must include—

- (a) the name of the proposed neighbourhood forum;*
- (b) a copy of the written constitution of the proposed neighbourhood forum;*
- (c) the name of the neighbourhood area to which the application relates and a map which identifies the area;*
- (d) the contact details of at least one member of the proposed neighbourhood forum to be made public under regulations 9 and 10; and*

- (e) *a statement which explains how the proposed neighbourhood forum meets the conditions contained in section 61F(5) of the 1990 Act.*
- 5.4. Upon receipt of an application, it is validated in accordance with the above.
- 5.5. In accordance with Regulation 9 of the Neighbourhood Planning (General) Regulations 2012, the authority must publish the following on their website and in such a manner as to bring the application to the attention of people who live, work or carry on business in the area to which the application relates:
- (a) *a copy of the application;*
 - (b) *a statement that if a designation is made no other organisation or body may be designated for that neighbourhood area until that designation expires or is withdrawn;*
 - (c) *details of how to make representations; and*
 - (d) *the date by which those representations must be received, being not less than 6 weeks from the date on which the application is first publicised.*
- 5.6. Regulation 11 of the 2012 Regulations allows that “*Where a neighbourhood forum has been designated in relation to a neighbourhood area under section 61F of the 1990 Act, and that designation has not expired or been withdrawn, a local planning authority may decline to consider any neighbourhood forum application made in relation to that neighbourhood area*”.
- 5.7. Section 61F of the TCPA (1990) specifies that an LPA may designate a relevant body as a Neighbourhood Forum if the authority is satisfied that it meets conditions identified in 61F(5) relating to purpose, membership and a constitution. The conditions are as follows:
- a) *It [the Forum] is established for the express purpose of promoting or improving the social, economic and environmental wellbeing of an area that consists of or includes the neighbourhood area concerned (whether or not it is also established for the express purposes of promoting the carrying on of trades, professions or other businesses in such an area).*
 - b) *It [the Forum] has a membership is open to:*
 - (i) *Individuals who work in the neighbourhood area concerned*
 - (ii) *Individuals who work there (whether for business carried out there or otherwise)*
 - (iii) *Individuals who are elected members of a county council, district council or London borough council any of whose area falls within the neighbourhood area concerned.*
 - c) *It [the Forum] membership includes a minimum of 21 individuals each of whom –*
 - (i) *Lives in the neighbourhood area concerned*
 - (ii) *Works there (whether for business carried on there or otherwise), or*

(iii) *Is an elected member of a county council, district council or London Borough Council any of whose area falls within the neighbourhood area concerned.*

d) *It [the Forum] has a written constitution*

e) *Such other conditions as may be prescribed.*

5.8. Section 61F(6) states a local planning authority may also designate an organisation or body as a Neighbourhood Forum if they are satisfied that the organisation or body meets prescribed conditions. The Secretary of State has not prescribed any conditions in the 2012 Regulations.

5.9. Section 61F(7) of the Act also requires that a LPA

- (a) *must in determining under subsection (5) whether to designate an organisation or body as a neighbourhood forum for a neighbourhood area, having regard to the desirability of designating an organisation or body –*
- (i) *which has secured (or taken reasonable steps to attempt to secure) that its membership includes at least one individual falling within each of the sub-paragraphs (i) to (iii) of subsection (5)(b).*
 - (ii) *whose membership is drawn from different places in the neighbourhood area concerned and from different sections of the community in that area*
 - (iii) *whose purpose reflects (in general terms) the character of that area*
- (b) *may designate only one organisation or body as neighbourhood forum for each neighbourhood area*
- (c) *may designate an organisation or body as a neighbourhood forum only if the organisation or body has made an application to be designated, and*
- (d) *must give reasons to an organisation or body applying to be designated as a neighbourhood forum where the authority refuse the applications.*

5.10. The Forum application is assessed against the above legislative criteria and public consultation responses. The following section assesses the application against the above criteria.

5.11. Once designated, section 61F(8) states that the Forum designation expires after 5 years to the day of designation. In addition, section 61F(9) states that:

A local planning authority may withdraw an organisation or body's designation as a neighbourhood forum if they consider that the organisation or body is no longer meeting—

- (a) *the conditions by reference to which it was designated, or*
- (b) *any other criteria to which the authority were required to have regard in making the designation;*

and, where an organisation or body's designation is withdrawn, the authority must give reasons to the organisation or body.

6. SPITALFIELDS NEIGHBOURHOOD FORUM APPLICATION

- 6.1. This section provides detailed assessment of the Spitalfields Neighbourhood Forum application, in relation to the criteria outlined above.

Making the Application

- 6.2. An application was received from the Spitalfields Neighbourhood Forum to renew their designation as a neighbourhood forum on 25 November 2020. The application contained:
- The name of the Neighbourhood Forum
 - A copy of the written constitution of the Neighbourhood Forum
 - The name of the Neighbourhood Area to which the application relates and a map which identifies the area
 - The contact details of at least one member of the Neighbourhood Forum which could be made public
 - A statement which explains how the Neighbourhood Forum meets the conditions contained in 61F(5) of the 1990 Act (provided through responses to the questions on the application form)
 - An appendix containing a number of documents demonstrating engagement that has been undertaken within the local community during the neighbourhood forum's current five year designation
- 6.3. On the same day, officers confirmed that the submission had been received and that the required details were included.
- 6.4. Under Regulation 11 of the 2012 Regulations, the Council may decline to consider an application for an area where there is an existing neighbourhood forum designation. The current forum designation in the Spitalfields neighbourhood planning area is in place until 5 April 2021. However, this application is being made by the currently designated forum to renew their designation, with the aim of ensuring a continuation of that designation, and not leaving the area with a period where no forum is designated. Under these circumstances, officers believe it is appropriate to consider the application.

Consulting on the Application

- 6.5. In accordance with regulation 9 of 2012 Regulations, public consultation on the Spitalfields Neighbourhood Forum application needed to be carried out for at least six weeks. The consultation began on 3 December 2020 and ended on 22 January 2021. This was more than the required 6 weeks, in order to account for the holiday period which fell in the middle of the consultation, and to ensure that all interested parties had suitable opportunity to submit responses.

6.6. The Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2016 insert regulation 9A into the 2012 Regulations. This states that:

- (1) *Where a local planning authority receive a neighbourhood forum application which they do not decline to consider under regulation 11, the authority must determine the application by the date prescribed in paragraph (2)*
- (2) *The date prescribed in this paragraph is:*
 - (a) *In a case where the neighbourhood area to which the application relates falls within the areas of two or more local planning authorities, the date which is the last day of the period of 20 weeks beginning with the day immediately following that on which the application is first publicised in accordance with regulation 9;*
 - (b) *In all other cases, the date which is the last day of the period of 13 weeks beginning with the day immediately following that on which the application is first publicised in accordance with regulation 9.*

6.7. Due to this requirement that the application be determined within 13 weeks of the consultation process beginning, and given the timescales of the Cabinet reporting process, it was necessary to begin the reporting cycle before the consultation process was completed. The DLT and CLT reports on this topic therefore provided a snapshot of consultation responses at the time of preparation of those reports. The MAB and CAB reports are accompanied by a consultation statement (appendix 5) setting out the methods used to publicise the consultation and the responses to the consultation.

6.8. To summarise, 17 responses were received to the consultation. Of these, 10 expressed full support for the renewal of the forum's designation (from the Attlee Centre, Spitalfields Community Group, Spitalfields Trust, Spitalfields Society, and six residents), 2 expressed no objection to the renewal (Historic England, and the Port of London Authority), and five had no comment to make on the application (Sports England, Transport for London, Natural England, the Canal and River Trust, and the Environment Agency).

Determining the Application: Section 61F(5) considerations

6.9. *In accordance with section 61F(5)(a), is the Forum established for the express purpose of promoting or improving promoting or improving the social, economic and environmental wellbeing?*

6.10. The Forum was established for the express purpose of promoting or improving the social, economic and environmental wellbeing of the Spitalfields Neighbourhood Area. The application outlines that the Forum aims, among other things, to improve community safety and cohesion, promote civic pride in the area, improve the functionality of the public realm, protect and promote heritage and conservation assets, identify areas for environmental

improvement, and promote sustainable development that contributes to the health of the local economy while managing negative impacts.

- 6.11. *In accordance with section 61F(5)(b), is Forum membership open to everyone who lives, works (for business carried out there or otherwise) or represents the Area as an elected member?*
- 6.12. The most recent version of the Spitalfield Neighbourhood Forum Constitution was adopted on 30 October 2018, and states in clause 6, sub-clauses c-f that membership is open to those who live in the area; business operators in the area; voluntary and community groups in the area; and elected borough council members representing the area.
- 6.13. Concern was raised by officers that the constitution does not explicitly state that people who work in the area have the right to membership – the clause relating to business operators referred to people formally representing the interests of the business, rather than individuals who may be employed within the area but wish to join the forum on their own behalf. This has been addressed by an update to the standing orders (clause 6b), which states that anyone who works in the area has the right to membership. The forum has undertaken to update the main constitution document to reflect this at their next AGM.
- 6.14. Officers are therefore satisfied that the constitution is in conformity with 61F(5)(b).
- 6.15. *In accordance with 61F(5)(c), does the Forum have a membership which includes a minimum of 21 people, each of whom lives, works or represents the Area as an elected member?*
- 6.16. The Forum has 236 members at the current time, and has provided a sample of 21 members on the application form who represent different interests within the area, including local residents, business operators, a ward councillor, and representatives from community organisations.
- 6.17. *In accordance with 61F(5)(d), does the Forum have a written constitution?*
- 6.18. As discussed above, the most recent version of the Forum's constitution dates from October 2018, and is accompanied by a set of standing orders that provide guidance on the application of the constitution. There are no requirements in the legislation for the constitution to contain particular items, other than for membership to be open to those who live, work, carry out business, or are elected representatives of the area, and this requirement has been met.
- 6.19. *In accordance with 61F(5)(e), does the Forum meet other conditions as may be prescribed?*
- 6.20. No other legislative or regulatory conditions have been prescribed and as such there are no matters for consideration as part of this application.

- 6.21. In terms of the Council's guidance, the Forum's application provides a significant amount of detail on the steps the Forum has taken to engage with local people over the previous 7 years and during the development of the neighbourhood plan.
- 6.22. The application acknowledges that the Forum has previously struggled to achieve a representative level of engagement from the significant Bengali population of their area. In 2017, when the Forum was undertaking a significant consultation effort through the community engagement platform Commonsense, they commissioned The East London Citizens Organisation (TELCO) to specifically engage this community, and took out a Bengali-language advert in the newspaper Janomat and delivered bilingual leaflets to addresses in the area. They also engaged with the local Sikh community to gather further consultation responses. In response to this, 37% of respondents to the consultation were categorised as British-Bengali/Bangladeshi (compared to 43% of the Spitalfields and Banglatown ward in the 2011 census figures). Figures for consultation responses from other ethnic groups were also broadly representative of the 2011 census figures. For more detail, see section 2a of the application form.
- 6.23. In accordance with 61F(6) does the Forum meet other prescribed conditions?
- 6.24. The Secretary of State has not prescribed any conditions in the 2012 Regulations.

Determining the Application: Section 61F(7) considerations

- 6.25. In accordance with 61F(7)(a)(i) does the Forum secure or take reasonable attempts to secure at least one individual who lives in the area, works in the area or is an elected member of the representing the area?
- 6.26. The Forum has secured membership of at least one individual who lives in the area, works in the area or is an elected member of the representing the area. Forum membership includes residents, local community and religious organisations representatives, local business representatives and an elected Tower Hamlets Councillor.
- 6.27. In accordance with 61F(7)(a)(ii), does the Forum's membership draw from different places in the area and different sections of the community?
- 6.28. The Forum has drawn a large number of members from across the area. The Forum recognises that their membership, being around two-thirds White British/White Irish does not fully match the demographic profile of the wider Spitalfields and Banglatown work, but highlights that engagement efforts with other communities over the past few years has led to an increase in the diversity of the forum among members in general and also among committee members. A significant amount of detail on this engagement work is provided in the application form, in sections 2a and 3b. Consultation responses from the Spitalfields Trust and Spitalfields Society, and from one of the residents,

commented on the representativeness of the Forum, and that it has worked well to increase diversity and inclusiveness and represents people from a wide range of backgrounds.

- 6.29. *In accordance with 61F(7)(a)(iii), does the Forum's purpose reflect the character of the Area?*
- 6.30. The objectives of the Forum are stated in clause 3 of the constitution, and include promoting the social, economic, heritage, and environmental wellbeing of the area; preparing a neighbourhood plan for the area; encouraging the involvement of the wider community in the development of the plan; fostering community spirit and encouraging civic pride; and promoting prosperity through economic growth and investment. These objectives can all be considered to reflect the character of the local area, which contains a high level of ethnic diversity, a number of significant heritage assets and conservation areas, and notable commercial areas such as Brick Lane.
- 6.31. *In accordance with 61F(7)(b) will designation result in only one organisation or body as Neighbourhood Forum for each Neighbourhood Area?*
- 6.32. The application is for the renewal of the existing designation of the neighbourhood forum for the Spitalfields Neighbourhood Planning Area. Following designation, there will still only be one designated neighbourhood forum for this area.
- 6.33. *In accordance with 61F(7)(c) will designation of an organisation or body as a Neighbourhood Forum only occur where an organisation or body has made an application to be designated?*
- 6.34. The Forum made an application for designation on 25 November 2020.
- 6.35. *In accordance with 61F(7)(d) will reasons be given to an organisation or body applying to be designated as a Neighbourhood Forum where the authority refuse the applications?*
- 6.36. This report recommends approval of the application. If a refusal is made by CAB, reasons will be provided to the Forum.

Conclusions

- 6.37. Officers are satisfied that the application for the renewal of the Spitalfields Neighbourhood Forum designation meets the conditions and provisions within section 61F of the TCPA 1990 and the 2012 Regulations, and recommend that the application be approved.

7. EQUALITIES IMPLICATIONS

- 7.1. Officers have used the Council's Equality Impact Assessment Screening tool to consider impacts on people with the protected characteristics outlined in the

Equalities Act 2010 (Appendix 6). It is considered that the proposals in this report do not have any adverse effects on people who share the protected characteristics and no further action is required at this stage.

8. OTHER STATUTORY IMPLICATIONS

- 8.1. 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.
- 8.2. Best Value Implications: During the determination of the submission the Council has worked with the Spitalfields Neighbourhood Forum where appropriate, and in line with our neighbourhood planning guidance, having regard to economy, efficiency, and effectiveness, and in conformity with the statutory requirements as detailed in the relevant legislation.
- 8.3. Consultations: See paragraphs 6.5-6.8 above.
- 8.4. Other implications: determining neighbourhood forum applications does not have any discernible implications on environmental issues, risk management, crime reduction, or safeguarding.

9. COMMENTS OF THE CHIEF FINANCE OFFICER

- 9.1 There are no material financial implications emanating from this report which seeks support for the re-designation of the Spitalfields Neighbourhood Forum as the designated neighbourhood forum for the Spitalfields Neighbourhood Planning Area as it meets the conditions and provisions within section 61F of the TCPA 1990 and the 2012 Regulations
- 9.2 Costs associated with the consultation process and assessment of the application amount to £221 for a public notice and staff time. These funds will be taken from the Plan Making team budget.
- 9.3 There is no Parish Council in place for the Spitalfields area. As a result, the CIL regulations 2010 allow the Council to retain any CIL income collected from this area but it must reinvest 25% of this income back into the local community. Should the application be accepted then this will need to be considered when using this CIL funding.

10. COMMENTS OF LEGAL SERVICES

10.1. This report requests Cabinet:

- approval of this report, which was presented to MAB on 10 February 2021 along with a consultation statement attached as an appendix and a final officer recommendation;
- approval supporting the re-designation of the Spitalfields Neighbourhood Forum as the designated neighbourhood forum for the Spitalfields Neighbourhood Planning Area; and
- note the Equalities considerations listed at paragraph 7.1 and Appendix 6 of this report as it applies to the proposed measures.

10.2. Pursuant to section 9D of the Local Government Act 2000 all functions of an authority are executive functions unless they are specified as not in either the 2000 Act or the Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (as amended). The decision on designating a Neighbourhood Forum is not a specified function and is therefore a decision for the Executive. The Executive is also authorised to consider the proposed recommendations in this report as they comprise a 'Key Decision' as defined in Section 3 of the Council's Constitution. Paragraph 6 of Section 3 of the Constitution defines 'Key Decision' as an executive decision which is likely to be significant in terms of its effects on communities living or working in an area comprising two or more wards or electoral divisions. As stated above in this report, the Spitalfields Neighbourhood Forum is likely to have a significant effect on communities living or working within the Spitalfields Neighbourhood Planning Area given that the Neighbourhood Forum was established for the express purpose of promoting or improving the social, economic and environmental wellbeing of the Spitalfields Neighbourhood Area. The Forum aims among other things, to improve community safety and cohesion, promote civic pride in the area, improve the functionality of the public realm, protect and promote heritage and conservation assets, identify areas for environmental improvement, and promote sustainable development that contributes to the health of the local economy while managing negative impacts.

10.3. The legislative framework for the designation of neighbourhood forums by the Council and their operative measures are set out in detail in this report and are contained in the Town and County Planning Act 1990 (as amended) ('TCPA 1990') and the Neighbourhood Planning (General) Regulations 2012(as amended) ('the 2012 Regulations'). The Government's Planning Practice Guidance ("PPG") on Neighbourhood Planning (Ref ID: 41-021-20140306) also provides guidance on the determination of such applications, which states that the role of the Local Planning Authority (LPA) is to take decisions at key stages in the neighbourhood planning process.

- 10.4. Section 61(F)(5) to (7) of the TCPA 1990 sets out the conditions that must be satisfied before a local authority may designate an organisation or body as a neighbourhood forum. This report provides a comprehensive assessment of the Spitalfield Neighbourhood Forum's application for re-designation as a neighbourhood forum and concludes that the conditions set out in this section of the TCPA 1990 satisfied in recommending Cabinet to approve the same provisionally, pending a final report on the results of the public consultation.
- 10.5. Regulation 9 of the 2012 Regulations requires the Council to publicise valid neighbourhood forum applications in the areas where they are proposed to operate and invite public representations for a minimum 6 week period.
- 10.6. The 2012 Regulations were amended by the Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2016. Under regulation 9A(2)(b) of the amended 2012 Regulations, the Council must make a decision on applications for neighbourhood forum designations within 13 weeks of starting a consultation on the application.
- 10.7. The Equality impacts of the proposed measure to redesignate the Spitalfields Neighbourhood Forum is set out in paragraph 7.1 and Appendix 6 of this report. It is considered that the proposed recommendations do not have any adverse effects on people with protected characteristics and no further action is required at this stage. Members must have regard to these equality impacts when reaching a decision.
-

Linked Reports, Appendices and Background Documents

Linked Report

- None

Appendices

- Appendix 1: Spitalfields Neighbourhood Forum Application Form
- Appendix 2: Spitalfields Neighbourhood Area Map
- Appendix 3: Spitalfields Neighbourhood Forum Constitution
- Appendix 4: Spitalfields Neighbourhood Forum Standing Orders
- Appendix 5: Consultation Statement
- Appendix 6: Equalities Impact Assessment Screening

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

- NONE

Officer contact details for documents:

Steven Heywood

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020 7364 4474

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Neighbourhood Planning Forum Application Form



This form should be completed electronically.

Important Information:

This application form should be completed using the information provided in the Tower Hamlets [Neighbourhood Planning Guidance Note Stage 1](#).

In order to increase the speed and ease of decision making, and to make the process more manageable for prospective Forums, the Council strongly suggests that this application should be completed and submitted after a Neighbourhood Area application. Once the Neighbourhood Area has been formally designated, a Neighbourhood Forum application can be submitted.

The Council wants to ensure that your applications are approved in a smooth and timely manner. In order to support this process, we encourage interested groups to meet and begin discussions with the Plan Making Team, well in advance of submitting an application.

This meeting will provide advice and guidance on key considerations, which will help to ensure that the Area and Forum, as applied for can be designated without delays.

Email neighbourhoodplanning@towerhamlets.gov.uk or call 020 7364 5009 to set up the meeting.

Contact information

Forum name

Spitalfields Neighbourhood Planning Forum

Contact details of the Forum (complete as relevant)

Email address	info@spitalfieldsforum.org.uk
Website address	www.spitalfieldsforum.org.uk
Facebook page	Click here to enter text.
Twitter account	Click here to enter text.
Other	Click here to enter text.

Neighbourhood Planning Forum application information

Public information

This section needs to be completed to ensure the Council has the information needed to determine whether the Forum meets the **four conditions** stated in the Localism Act. The four conditions are numbered below.

1	The Forum is established to promote or improve the social, economic and environmental well-being of its neighbourhood.
1a. How will the Forum seek to promote or improve the Neighbourhood Planning Area in terms of its social, economic and environmental well-being?	
Social well-being	Through consultation and community discussion we aim to improve the current situation in relation to social capital, community safety, sustainable living and community cohesion wherever possible via spatial policies within our Neighbourhood Plan as it is developed. We will ensure that social well-being of the residents, businesses and organisations are fully considered with specific regard to the impact of any proposal arising out of the plan. Further to this we will foster community spirit, encourage good will and promote civic pride through the activity of developing the Neighbourhood Plan.
Economic well-being	Through consultation and community discussion on development of the Neighbourhood Plan we would aim to improve economic well-being by: <ul style="list-style-type: none"> -promoting adequate provision for local jobs, training and enterprise -encourage existing businesses to flourish through networking, good connections and improved functionality of the public realm -promote sustainable development that contributes to the health of the local economy, while ensuring management of negative impacts -protect and promote the heritage and conservation assets of the area, to help support their contribution to the local economy -promote a local sustainable energy economy.
Environmental well-being	We plan to identify key areas of environmental improvements and use policy implementation to help improve the sustainability and environmental quality of public spaces, green spaces (parks and gardens), streetscapes, buildings, conservation and heritage, ecology, air pollution and energy efficiency for the benefit of residents, organisations and businesses through community involvement and encouraging good will.
1b. How will the Forum embed the Council's guidance and aspirations within the Community Plan, Single Equality Framework, Core Strategy, and Managing Development Document into their activities?	
Community Plan and Single Equality Framework	Through the development of a neighbourhood plan and through the identification of community needs and priorities, our ambition is to improve the quality of life for everyone who lives and works in the parts of Spitalfields & Banglatown and Weavers wards covered by our neighbourhood planning area. Our policies and activities shall be intended to reduce poverty and inequality, bring local communities closer together, and provide strong neighbourhood leadership by involving people from all backgrounds including hard to reach communities and giving them the town planning tools and community support to improve their lives. Our neighbourhood forum is open, transparent and democratic. Our meetings and policies are open to all and we have and will continue to work hard to ensure the broadest participation and inclusion in our work. We have worked passionately to ensure that our Forum's membership is inclusive and open to all people aged 18 and over

	and organisations likely to be affected by neighbourhood planning proposals for the area and as such in conformity with the London Borough of Tower Hamlets statement. The decision-making processes set out in our constitution ensure that the Forum will be accountable to its members which includes all potential stakeholders in the neighbourhood area, including ward councillor members. We also seek to ensure representation from different and hard to reach groups promoting social inclusivity and will continue our outreach activities within different places.
Tower Hamlets Local Plan 2031	Our Neighbourhood Plan will develop target driven policies relating to design, location and impact of development in the area in conformity with the strategic policies set out in Tower Hamlets' Local Plan.

1c. How will the Forum envisage engaging with other local forums and groups? (for example, has a Memorandum of Understanding, which could provide the basis for joint working agreements with other local forums/groups been explored?)

Groups within the neighbourhood area have been and will continue to be able to directly join the Forum and be involved with the decision-making process about the plan during the development and later implementation stages. Our membership currently stands at 236 members from residents, local businesses and local organisations. Our constitution (attached) also commits us to consultation and discussion with people and organisations within the neighbourhood area whether they are members of the Forum or not.

We will do/have done this through an ongoing consultation and engagement programme (using media, meetings and workshops) that identifies issues and local views. There have been regular liaison meetings with other local groups over the years which in almost all cases have become affiliated members of Spitalfields Neighbourhood Forum, who have opted to receive our information and correspondence, attend our meetings, and which we hope to maintain and expand through the lifetime of our neighbourhood plan, including: Spitalfields Community Group, The Spitalfields Society, The Spitalfields Historic Buildings Trust, Holland Estate Management Board, St George Residents' Association, Attlee Youth and Community Centre/Attlee Foundation, Spitalfields City Farm, Spitalfields Regeneration(SPIRE), Spitalfields Open Space, Spitalfields Small Business Association, the East End Trades Guild, OPRG(Older Person's Reference Group), Tower Hamlets Health Watch, and the Spitalfields & Banglatown Ward Panel, as well as representatives from key local business stakeholders such as Old Truman Brewery and Old Spitalfields Market.

2 The Forum's membership is open to everyone who lives in, works in or represents the area as an elected member.

2a. How have the Forum taken steps to promote the opportunity to be involved in the Forum and engage with local people prior to submitting this application? This may include evidence of discussions, meetings and consultations.

An Interim Steering Group (ISG) with purpose of establishing a neighbourhood forum was established after a joint decision in December 2013 by the Spitalfields Society (an amenity society established 1992) and the Spitalfields Community Group (established 2011) to work together on this project. It was agreed by the two groups that the creation of a neighbourhood plan would meet the aims and objectives of both the local organisations and would improve Spitalfields as a place to live and work.

The work to establish a neighbourhood forum and define a neighbourhood area would be coordinated by an Interim Steering Group established for that purpose.

In early 2014 the Interim Steering Group appointed Lorraine Hart as a consultant and began meeting together.

The draft Constitution was based upon other similar constitutions successfully used in other neighbourhood forums.

The ISG decided to organise two public consultation meetings to invite comments on draft proposals for a constitution and the boundaries of the neighbourhood area. The first consultation event in July 2014 would be for local stakeholders and a second consultation event held a little later in August would be for the general public.

Using a variety of local contacts the ISG began to draft a list of local 'stakeholders' whom it would aim to consult with as early as possible regarding neighbourhood planning in Spitalfields. Particular regard was paid to ensuring it would reach ALL sections of the community, particularly hard-to-reach sectors. This list was created using the ISG's own developing knowledge as well as reaching out to groups such as the Tower Hamlets Council Volunteer Centre, Toynbee Hall and extending its contacts to a wider list of local groups involved in the public consultations on the Bishopsgate Goods Yard development (list produced by Soundings for Ballymore/Hammerson). Via these sources it was possible to put together a list of about 75 local organisations, resident groups and notable business interests in the area which would be the 'stakeholders'. This group was not 'set in stone' but was fluid as more names were added and some which were inactive were removed.

In mid-2014, a leaflet was produced called Your Spitalfields: Your Future and delivered by hand to every residential and business address in the central Spitalfields area. This leaflet explained what neighbourhood planning was and invited recipients to attend the public consultation meeting in August to learn more about the opportunities it presented communities such as ours. At around the same time a letter was sent to each of the 75 stakeholders we had identified which invited them to a separate stakeholders meeting in July.

In July 2014 representatives of 26 local stakeholders attended a stakeholder consultation meeting at the Attlee Centre and gave detailed feedback to us about how they thought a neighbourhood plan might help meet the needs of the local area. These organisations represented tenants', community and residents' groups, key local businesses and employers, charities and trusts and heritage groups and business associations who had all responded to the letters that had been sent out.

In early August 2014 a second public consultation meeting was held, also at the Attlee Centre. Many local people attended this after receiving our leaflet and learnt about neighbourhood planning and gave us further helpful feedback. At this meeting it was proposed by local residents and other persons present that the neighbourhood area boundary should be extended slightly to include Spitalfields City Farm and the Chicksand Street Ghat. This was agreed.

At both these meetings the ISG began gathering members of the prospective neighbourhood forum and established three categories of membership: (a) resident member; (b) business member; (c) representatives of local non-profit organisations. Through these meetings and through the dedicated website, 90 members were signed up by the time of the inaugural meeting.

On 18 August 2014 the inaugural meeting of the Spitalfields Neighbourhood Planning Forum was held with 34 members in attendance. At this meeting the boundaries of the proposed neighbourhood area and the terms of the proposed constitution were debated and adopted by local people. An alternative boundary proposal that excluded the Truman Estate was considered but ultimately a version of the bounds that included that estate was agreed in a vote. The prospective neighbourhood forum was then formed and its elected committee of 12 people was tasked with submitting an application for official Forum approval and Area designation to THBC.

The committee that was formed at the inaugural meeting was assembled according to the Constitution and consisted of 12 members so elected for that purpose from among the general membership. There were six resident members elected, three business members elected (representing Zeloof LLP, Old Truman Brewery and Johnson Architecture & Design) and three local organisation members elected (Cllr. Tarik Khan representing SOUL, Tania Shaikh representing the Attlee Youth & Community Centre and Nicholas Jones representing Friends of Mallon Gardens). Tarik Khan would serve as our Vice Chair for the next four years.

An application for Forum approval was made in December 2014. A revised Neighbourhood Forum application was eventually approved (with some minor neighbourhood area boundary changes) by THBC in a designation and approval statement made in April 2016 which established the Spitalfields Neighbourhood Area as a business neighbourhood area and approved the Spitalfields Neighbourhood Planning Forum as the neighbourhood forum for the Spitalfields Neighbourhood Area.

During 2015 and 2016 the committee (by now called the 'Forum Council' to distinguish it from numerous other local committees) considered different ways of understanding local planning policies and consulting local people on them. A 'consultation framework' was agreed that would be used by variously themed policy working groups so they operated within common parameters. The working groups would research and understand the existing planning policy in particular areas of interest and then reach out to the local community to get their input on particular problems and opportunities in that policy area.

In 2017 the Forum appointed Tony Burton as a consultant to help refine the processes that the Forum had already begun to develop. It was agreed to continue the established policy of diversified consultation by having separate and bespoke consultation methods with one type aimed at 'local stakeholder consultations' (primarily local businesses and other organisations with an interest in Spitalfields) and another type aimed at the general public, local residents and workers. To advance the first type, a list of about 40 local stakeholders was drawn up and letters were sent to them inviting them to take part in our consultations about the needs and opportunities in Spitalfields. Around half of these stakeholders agreed to engage with the Forum.

Participants in the stakeholder consultation exercise included the Cabinet member for Strategic Development at THBC, representatives of the owners of Old Spitalfields Market, the director of the East End Trades Guild, representatives of the owners of the Old Truman Brewery estate, the author of Spitalfields Life (a local, online publication), representatives of Spitalfields Housing Association and East End Homes, Spitalfields Community Group, the Spitalfields Society, Spitalfields Historic Buildings Trust, the Friends of Christ Church Spitalfields, the Rector of Christ Church Spitalfields, the chairman of the Banglatown Restaurants' Association, the organiser of the Bengali East End Heritage Society,

representatives of British Land and Spitalfields City Farm. In 2019, Saif Osmani, representing the Bengali East End Heritage Society became a Vice Chairman of the Forum.

These consultations consisted of face-to-face interviews asking a set of questions common to each interview. The interview lasted about an hour and were recorded and later codified so the themes and priorities could be drawn out in such a way as to be made quantifiable. The interviews took place during 2017 and 2018 and the analysis of the data derived from these interviews was made by Gracechurch Consulting (which is a full member of the Market Research Society) in September 2018. This full report by Gracechurch Consulting as well as a full list of respondents can be seen in Appendix A.

When the extent of this research began to be evaluated and the range of contributions by local businesses was evaluated by our consultant Tony Burton he said the efforts we had made to ensure businesses were included in our plan making process were “among the best he had seen”.

In March 2017, Commonplace was appointed to facilitate the Forum’s general public consultation. The Commonplace survey platform has been used by many neighbourhood plan making bodies to record public opinion about particular places in their neighbourhood area. This survey recorded how people felt about those particular places or issues and provided an opportunity for them to recommend improvements. To encourage participation, three walkabout tours took place where members of the public joined Forum committee members to visit parts of Spitalfields and record their views on the Commonplace platform. Public awareness of this consultation was made by a leaflet delivery and through a public meeting where the survey platform was launched and explained. Local newspapers reported on this meeting which further spread the word.

In September 2017 the Forum determined that it had to ramp up its efforts to seek the views of harder-to-reach communities, in particular the British-Bengali community. It engaged with the East London Citizens Organisations (TELCO) which is part of the civic organisation Citizens UK (CUK) to facilitate this. Their services were commissioned to use paper versions of the Commonplace survey form and approach the communities the Forum had hitherto struggled to get a representative level of engagement from. TELCO recruited students from the Geography Department at Queen Mary University to help them gather the data required.

The Forum also tried its best to ensure local people knew about the work of the Forum by running a half-page Bengali-language advert in Janomot newspaper for three weeks in September 2017 and commissioning Royal Mail to do a door-to-door bulk delivery of a bilingual leaflet which was delivered to 5,266 household and business addresses in the E1-6 and E1-7 ‘postal sectors’ in August 2017. The parts of the neighbourhood in other postal sectors were delivered by hand.

TELCO collected 231 surveys from members of the public at various locations determined by them as suitable for collecting the opinions of the hard-to-reach communities from whom more feedback was needed. They set up stalls and helped people fill in paper-based survey forms asking the same questions as the online Commonplace survey both at the Brick Lane Mosque and the East London Mosque. TELCO also engaged with the Brick Lane Trust, the Mariam Centre, Spitalfields Small Business Association, the Osmani Trust, Canon Barnet School and Christ Church Primary School and arranged for surveys to be emailed out to participants, resident groups and parents. The survey to resident liaison groups associated with Spitalfields Housing Association as well as the Brick Lane Trust included

a £5 voucher to incentivise participation. The small local Sikh community also assisted by taking some paper survey forms to a community centre. At each of these events people were invited to get more involved in the work of the neighbourhood forum, to join and to sign up to take part.

In March 2018 this period of general public consultation came to an end. 1,809 separate people had visited the survey site in total. 664 people had read the site in depth but did not comment. 402 individuals had interacted in some way with the site by commenting or agreeing with other people's comments. These 402 people had made separate 602 comments and 1,492 agreements with other people's comments.

In addition to these 402 people who actively took part in the Commonplace survey online, 231 people who had completed a paper survey were contacted directly by Citizens UK/TELCO and asked to indicate their views on places in Spitalfields.

The engagement that took place online and on paper can be understood in terms of the type of people who got involved. Of the total of 633 participants, 32% said they lived in the neighbourhood area, 30% said they worked there, 29% were visitors to the area and 9% indicated they were students. The participants also indicated that 59% were female, 37% were male and 4% either did not record their gender or said they were another category.

In terms of ethnicity, respondents to our consultation into the needs and priorities of the area closely matched national statistics data for the Forum area. The largest group of contributors declared they were white (39%), with a slightly smaller proportion saying they were British-Bengali/Bangladeshi (37%). In addition, a further 7% said they were "other Asian", 9% said they identified as black, 4% were mixed race and 4% did not declare an ethnicity.

National Statistics data from the Census of 2011 indicates that a total of 43% of the larger Spitalfields & Banglatown Ward identify as either 'White British' or 'White Other'. 41% of the same ward identify as 'Bangladeshi/Bengali'. 5% identify as black and 9% in the other categories. So it can be said that the profile of the people responding to the Forum survey very closely corresponds to the profile indicated by national statistics and the public consultation exercise using Commonplace (online and on paper) can be said to be very representative of the people who live in the area. Further information about the Commonplace survey and the data can be seen in the Appendices of the Draft Neighbourhood Plan submitted to LBTH in October 2020.

After the end of our consultation period in March 2018, the Forum spent the six months or so analysing all the data it had received. It was possible to pick out the positive and negative comments from the online survey.

The Forum blended into this process the data from the in-depth stakeholder consultations and this further reinforced the importance of some of these areas of improvement, particularly regarding the heritage of the area. Numerous stakeholders also raised the growing concerns of small and micro local businesses concerning increasingly high rents and the costs of doing business.

All of this material was distilled through a process of identifying key words and giving them relevant weight and priority according to the frequency and intensity they were raised in the two forms of consultation. This process resulted in the drafting of a 'Vision for Spitalfields' in late 2018.

The vision was further refined and during 2019 three core and 'achievable' objectives were developed which we felt most closely represented the sum of data we had received.

These three objectives were:

1. to improve the environment by providing as much greenery as possible in this deeply urban area;
2. to protect and enhance the historic built environment; and
3. to maintain the special and diverse business mix that has settled in the area whilst maximising the employment opportunities that result from the neighbourhood's prime location and to support the small scale creative and artisan businesses that have always been part of the Spitalfields story.

Throughout the rest of 2019, three 'policy working groups' were established to research ways the Forum could achieve those core objectives. The policy working groups (business mix, urban heritage and green spaces) looked more closely at the data and in particular a report the Forum had commissioned which analysed the survey data geographically to identify areas of most interest or concern. The working groups also reached out to expert organisations such as the Spitalfields Historic Buildings Trust, key local business stakeholders and the East End Trades Guild to gather additional evidence to support and justify particular policies that were designed to achieve the core objectives, realise the Vision for Spitalfields and meet the unique needs of Spitalfields in the 21st century.

In late 2019, the Forum Council engaged with Navigus Planning for their assistance and guidance in drafting a neighbourhood plan document. The Forum was aware that Navigus were involved in supporting another neighbourhood forum elsewhere in Tower Hamlets and therefore considered choosing Navigus a sensible option as they would be familiar with the borough and THBC officers. The policy working groups then worked closely with Navigus Planning during early 2020 to determine how the objectives would be delivered through planning policy. Separate meetings were held between members of the Forum Council representing business, resident and local organisation interests in all the key objective areas until the policies for environment, business mix and urban heritage were agreed.

Further expert advice was brought in to assist the heritage working group. Dan Cruickshank and Alec Forshaw undertook a detailed survey of the neighbourhood area to support our urban heritage policies.

Expert advice was also sought by the environment/green working group. The biodiversity officer at THBC contributed his views on a range of biodiversity initiatives being considered. The Liveable Streets team were approached for their input. Other local groups such as Spitalfields Open Space and the Attlee Youth & Community Centre were asked for their help in providing further justification for the inclusion of Christ Church Gardens and the Chicksand Street Ghat (respectively) as Local Green Spaces.

The East End Trades Guild shared its own research with the Forum Council to support the policies designed to support our business mix. The East End Trades Guild through its representatives, justified, wrote and agreed the wording of the business mix policies in dialogue with other sectors of the community represented on the Forum Council.

When the COVID crisis began in February 2020 the Forum set up a local WhatsApp mutual aid group. This group worked with local elected members to coordinate the delivery of meals and the running of errands to local people who chose to ask for our assistance. Volunteers delivered leaflets on behalf of

the neighbourhood forum to various parts of the neighbourhood to ensure people did not feel they were alone and knew they had someone to ask for help. This mutual aid group had around 25 vulnerable people for whom the forum and its affiliates coordinated support.

At a Forum Council meeting on 12 June 2020 all the policies in the pre-submission draft plan were agreed and the document was shared with officers in the Strategic Planning Department at THBC for their informal comments and feedback.

The draft Spitalfields Neighbourhood Plan was amended following feedback from THBC and the final version of the draft document was recommended to the members of the Forum who voted to recommend it proceed to Regulation 14 Consultation on 15 July 2020.

Regulation 14 (Pre-Submission) Consultation was undertaken between 20th July and 14th September 2020. Leaflets publicising the consultation and summarising the key issues were hand-delivered to every address in the Neighbourhood Area. This information and the plan document were also presented on the Spitalfields Neighbourhood Forum website.

A separate survey was conducted using Survey Monkey focussing on some specific public realm improvement proposals. This was sent out using local resident group email lists. The intention was to confirm or otherwise the public realm items in the proposed CIL spending list.

The statutory bodies were informed of the consultation either by email or letter. The list of statutory bodies was as follows:

- London Borough of Tower Hamlets
- Mayor of London
- City of London
- London Borough of Hackney
- Coal Authority
- Ministry of Housing, Communities and Local Government
- Natural England
- Environment Agency
- Historic England
- Network Rail
- Transport for London
- Marine Management Organisation
- NHS
- Central London Clinical Commissioning Group
- National Grid
- UK Power Networks
- Thames Water
- Metropolitan Police
- Local ward councillors for wards covered by the Neighbourhood Area and surrounding wards

In addition, a range of other bodies were written to. These included the emergency services, the Canal and River Trust, the British Bangladeshi Chamber of Commerce, the Society for the Preservation of Ancient Buildings, the East End Trades Guild, the Spitalfields Parochial Church Council and the

Spitalfields Society. A host of local business and major landowners were written to, including the Truman Brewery, Old Spitalfields Market and British Land.

Each of the owners of sites or buildings proposed as Non-Designated Heritage Assets was written to at the address in question. All of the owners of the Local Green Spaces were also written to.

In total, representations were received from 38 residents, 3 businesses, 13 local stakeholder bodies and 9 statutory consultees. In addition, 38 residents took part in the public realm survey.

Appendices:

- 1. Copy of Leaflets 2014-2020 and Postal Sectors map showing areas 1a and 1b were hand delivered
- 2. Minutes of AGMs held in 2016, 2017, 2018, 2019 and 2020
- 3. List of current serving Members of the Forum Council (governing committee) as elected in 2020

3

The Forum's membership includes a minimum of 21 people, each of whom lives in, works in or represents the area as an elected member.

3b. Does it have a membership of at least 21 people?

Yes No

3b. How have the Forum secured (or taken reasonable steps to attempt to secure) at least one person from those who live in, work in or represent the area as an elected member in its membership? This may include evidence of discussions, meetings and consultations.

As outlined in 2 above we have been diligent in our attempts to include everyone as members and let them know about our activities to create a Neighbourhood Plan and to ensure that we can monitor our inclusion going forward. From an early stage (in January 2014) we asked LBTH to provide appropriate demographic data for the Spitalfields area which we kept firmly in mind as we sought to make people aware of the project and get their involvement. This data strongly influenced our desire to make sure our stakeholder list included as many British-Bangladeshi and other ethnic groups in it as well as compelling us to ensure our committee and later Forum Council (post 2016) had persons on it across the communities. In addition, at every stage we have actively sought cross community involvement at our consultative events through the stakeholder list as well as a determination to comprehensibly deliver our information and invitation leaflets (Your Spitalfields Your Future) to areas of the proposed neighbourhood area where we know hard to reach communities live (for example the Holland Estate Management Board) and have actively sought the involvement of faith groups. Our membership application form collates all information relevant to equalities issues which we shall monitor and take steps to address when the Forum thinks that groups are under-represented. Since our Forum was designated by LBTH in April 2016 we have continued to develop and enhance our processes and our membership has increased substantially to 236 members of whom around a quarter are known to be from a BAME background and 15% are in the category of 'White Other', the remainder being White British or White Irish and constitute around two thirds of our membership. We recognise that this does not exactly reflect the profile of the ward but the neighbourhood area covers a different area to the whole ward which has a slightly different ethnic profile and we believe the growing presence of BAME persons among our membership, and increasingly around our lead activists, reflects the genuine and sustained efforts we have made to ensure a diversity of voices within our organisation. We undertook a street-level membership drive on Wentworth Street to get the involvement of the West-African textile retailers in this area and have half a dozen business representatives now from this community. We have included people of British-Bangladeshi business representatives in all our consultations, which have on occasion been translated into Sylheti (for example newspaper advertisements in Janomot) and have regularly involved them in discussions and communications about what is going on. We

have representatives of this community on our Forum Council and have consistently reached out to include this group. The Attlee Foundation and its Youth & Community Centre have been a strong supporter of our organisation since its outset.

Local councillors for both Spitalfields & Banglatown and Weavers wards have been members of the Forum since we began and we are glad to welcome Cllr. Shad Choudhury back to the Forum Council again this year. Tarik Khan, was Vice Chair of the Spitalfields Neighbourhood Planning Forum between 2015 and 2019.

We have had busy General Meetings and Annual General Meetings throughout the period 2016-2020 since designation of the Forum, with over fifty people attending our AGM in 2019. We have worked well with the local business community and have active involvement from Zeloof LLP as well as representatives of Brick Lane hospitality venues at our meetings. Around a third of our 236 members are members in their capacity as representing businesses based or operating in the neighbourhood area.

We will continue the work of reaching out and engaging with the community. We have significant expertise in the field of online social media and are confident in continuing to build up and diversify our forum membership and to encourage in depth engagement with area residents, organisations and businesses. In particular we will encourage our members to share our output. We will continue to use forms of social media such as Twitter to publicise ourselves as we move forward. We will post relevant material and encourage responses and participation. The aim will be to work together by using our personal accounts to share and encourage other forum members to do the same. We will network with professional bodies, other groups and contributors on NPF issues. We will continue our much-praised work with business estate owners, e.g. Old Truman Brewery and Spitalfields Estates and ask them to distribute material to their tenants. In the case of hard to reach and gated communities we will continue to work with resident groups such as Holland Estate Management Board, Cloisters and Spitalfields Market Residents Association who provide access or use their own notification systems. We will use existing networks of residents' associations and business operators to promulgate further and increase awareness. Subject to budget we will further develop hard copy leafleting within the neighbourhood area. We will continue the media programme with local press such as the Docklands and East London Advertiser and Sylheti-language press.

Appendices

4. Copies of some newspaper stories
5. Newspaper advertising
6. Constitution & Standing Orders
7. Consultation Reports
8. List of Forum Members (2020)

3c. Do members come from different places within the neighbourhood and do they reflect the diversity of the people within the neighbourhood? Please provide the name, postcode and interests & relevant background of each member.

#	Name	Postcode	Interests & relevant background
1	Cllr. Shad Choudhury	E1 6BX	Ward councilor, local resident
2	Dan Cruickshank	E1 6BT	Architectural historian, local resident

3	David Donoghue	E1 6QQ	Vice Chairman, Spitalfields Society, community assoc., local resident
4	Chris Dyson	E1 6QH	Local resident and business operator
5	James Frankcom	E1 6SE	Local resident, former Mayor's Community Champion Coordinator
6	Tayo Abimbola	E1 7TA	Business operator on Wentworth Street
7	Tania Shaikh	E1 6RT	Director of Attlee Youth & Community Centre, member representing a non-profit organisation.
8	Sheikh Aliur Rahman	E1 6SE	Business operator on Brick Lane
9	Mir Haque	E1 6RL	Business operator on Brick Lane
10	Abdul Ahad	E1 6RU	Business operator on Brick Lane
11	Azmal Hussain Mert	E1 6RU	Business operator on Brick Lane
12	Julie Ji	E1 6FQ	Local resident
13	Kemi Lamuye	E1 7TF	Business operator on Wentworth Street
14	Susie Symes	E1 6QH	Director of Museum of Immigration & Diversity, Princelet Street. Local resident.
15	Christine Whaite	E1 6BT	Director of Spitalfields Open Space and local resident.
16	Yolanda de los Bueis	E1 7NW	Chair, Holland Estate Management Board, local resident
17	Jeremy Freedman	E2 6DY	Former manager of Sandy's Lane Synagogue and local resident
18	Kanjana Sawangha	E1 7NE	Business operator on Toynbee Street
19	Jason Zeloof	E1 6QL	Business operator on Brick Lane, owner of Old Truman Brewery estate.
20	Naineshkumar Tanna	E1 7NR	Local resident
21	Caj So Wai	E1 6EH	Business operator on Cheshire Street

We have 236 members in total and can provide other members details if required.

4 The Forum has a written constitution.

4a. Has the Forum completed and attached a written constitution?

Yes No

4b. Has the written constitution been developed in a correct and proper manner? (in accordance with Locality Guidance)

The constitution was approved by LBTH in 2016 when our Forum was first designated. The constitution was based on a version developed by Locality introduced to us by our consultant from Locality, Lorraine Hart, and used in other neighbourhood forums such as that in East Shoreditch. We have since added some of our own rules known as Standing Orders that enable parts of the constitution to be more clearly understood. The Standing Orders form part of the Constitution under section 12c & 12d. Aspects of the Constitution regarding Business membership were discussed with LBTH officers and approved in 2016. Amendments have been made to Standing Orders at the

recommendation of LBTH officers to clarify business membership is in accordance with the regulations in November 2020.

Meeting Log: Please provide dates of your meetings with the Plan Making Team	Telephone and email correspondence with Steven Heywood during 2020.
Applicant name	Spitalfields Neighbourhood Planning Forum
Date	23.11.2020



Please note: Forums will be required to inform the Council of any change to the original content and intentions detailed in its application form. Specifically, any change to the membership of the Forum and written constitution will require the Forum to immediately notify the Council of these changes, in writing to the neighbourhood planning email address.

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Spitalfields Neighbourhood Planning Area

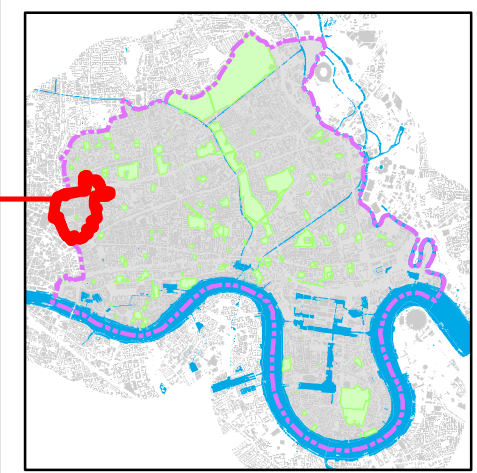
Spitalfields Neighbourhood Planning Area London Borough of Tower Hamlets

LEGEND

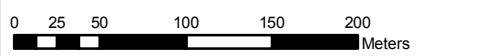
-  Neighbourhood Planning Area
-  Borough Boundary



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Spitalfields Forum

Spitalfields Neighbourhood Planning Forum



CONSTITUTION v.2.2

PREAMBLE:

Tower Hamlets Council, in accordance with the Town and Country Planning Act (1990) and pursuant to a decision made on 5th April 2016 by the Mayor in Cabinet, designated the Spitalfields Neighbourhood Planning Area as a Neighbourhood Business Planning Area and approved the Spitalfields Neighbourhood Planning Forum as the Neighbourhood Planning Forum for the Spitalfields Neighbourhood Planning Area.

1. NAME

- a) The long form name of the group is “Spitalfields Neighbourhood Planning Forum” referred to elsewhere in this Constitution as the “Forum”;
- b) The short form name of the group is “Spitalfields Forum”.

2. NEIGHBOURHOOD AREA

The area of the Forum is the neighbourhood business planning area designated by the London Borough of Tower Hamlets as the Spitalfields Neighbourhood Planning Area and is shown on the attached map (Figure 1). It is referred to elsewhere in this constitution as the “neighbourhood area”.

3. OBJECTIVES

The objectives of the Forum shall be to:

- a) Promote and improve the social, economic, heritage and environmental well being of the Neighbourhood area;
- b) To prepare in partnership with the relevant local planning authority a sustainable Neighbourhood Development Plan for the Neighbourhood area;
- c) To encourage the goodwill and involvement of the wider community in the preparation, production and implementation of the Neighbourhood Development Plan;
- d) To foster community spirit and encourage civic pride;
- e) To promote local prosperity through neighbourhood based economic growth and investment.

4. POWERS

In furtherance of the objects, but not otherwise, the Forum Council may exercise the power to:

- a) Invite and receive contributions and raise funds where appropriate, to finance the work of the Forum, and to open a bank account to manage such funds;

- b) Set up working groups with terms of reference to undertake tasks in furtherance of its objectives. All such working groups must include at least one Forum Council member;
- c) Publicise and promote the work of the Forum and organise meetings, training courses, events or seminars relevant to its work;
- d) Work with groups of a similar nature and exchange information, advice and knowledge with them, including cooperation with other voluntary bodies, charities, statutory and non- statutory organisations;
- e) Employ a Clerk and other staff (who shall not be members of the Forum Council) as are necessary to conduct activities that meet the objectives of the Forum;
- f) Take any form of action that is lawful, which is necessary to achieve the objectives of the Forum, including taking out any contracts which it may see fit.

5. AFFILIATIONS

The Forum shall not be affiliated to any political party or organisation.

6. MEMBERSHIP

- a) Members will apply for membership and the Forum Council shall have the power to accept members. Members of the Forum must be over 18 (eighteen) years of age;
- b) The Forum Council may refuse membership, or may terminate or suspend the membership of any member by resolution passed at a Forum Council meeting where it is considered membership would be detrimental to the objectives and activities of the Forum;
- c) Membership is open to all who live in the neighbourhood area (see Article 2 Above);
- d) Membership is open to all business operators in the neighbourhood area of the Forum – Business operators may nominate up to two people in their membership application but they may only exercise one voting right at General and Annual General Meetings of the Forum;
- e) Membership is open to all constituted voluntary community groups which operate in the neighbourhood area. Voluntary and community groups and local organisations may nominate up to two people in their membership application but they may only exercise one voting right at General and Annual General Meetings of the Forum;
- f) Membership is open to elected London Borough Council members who represent wards in the neighbourhood area;
- g) Membership shall be drawn from different places in the neighbourhood area and different sections of the community;
- h) Any member of the Forum may resign from membership by providing the Secretary with written notice;
- i) The Forum shall have a minimum of 21 (twenty one) members. The Secretary shall maintain a register of members at all times and make it available to any member of the Forum or the public who requests it.

- j) Associate Membership may be granted to any person at the discretion of the Forum Council. Associate Members may attend and participate in Meetings of the Forum but they may neither vote nor be elected to the Forum Council.

7. FORUM MEETINGS

All decisions at Forum meetings shall be made on a show of hands of members who are entitled to vote at the meeting.

- a) General Meetings
 - i. General Meetings of Forum members shall take place at least 3 (three) times per year.
 - ii. Notice and an agenda for a General Meeting of the Forum to Forum members shall be 10 (ten) working days;
 - iii. The quorum required for a General Meeting to conduct business shall be 11 (eleven) Forum members.
- b) Annual General Meetings/Special Meetings
 - i. An Annual General Meeting of Forum members shall take place once in every calendar year. Notice and an agenda for an Annual General Meeting to Forum members shall be 15 (fifteen) working days;
 - ii. The quorum required for an Annual General Meeting to conduct business shall be 15 (fifteen) Forum Members.

The Annual General meeting shall:
 - iii. Elect the Forum Council;
 - iv. Receive a report from the Forum Council of the activities that have taken place in the year;
 - v. Receive a final statement from the Treasurer.

Elections to the Forum Council shall take place as follows:
 - vi. Forum members shall notify the Secretary of the Forum of their intention to stand for a place on the Forum Council in writing and at least 5 (five) working days before the Annual General Meeting takes place;
 - vii. At the Annual General Meeting elections shall be held on the basis of a show of hands for each candidate.
- c) Special Meetings may be called from time to time by the Forum Council to consider amendments to the constitution or dissolution of the Forum. These shall be subject to the same notice and quorum as Annual General Meetings.
- d) Forum Council Meetings
 - i. Forum Council meetings will be held a minimum of 6 times per year;
 - ii. Notice to members of the Forum Council of a Forum Council meeting shall be 7 working days;
 - iii. The quorum required for a Forum Council meeting to conduct business shall be 7 (seven) members;

- iv. Two officers of the Forum Council must be present at each meeting of the Forum Council. One of which must be either the Chairman or the Vice Chairman;
- v. All decisions at Forum Council meetings shall be made on a show of hands of Forum Council members present at the meeting;
- vi. The Officers of the Forum Council shall be elected by the Members of the Forum Council at the first meeting of the Forum Council after the AGM of the Forum;
- vii. To avoid the possibility of the Forum becoming dominated by members of another organisation no more than four members of the Forum Council may at any time be drawn from the Forum membership category for business and no more than four may be drawn from the Forum membership category for voluntary and community groups (see clause 6d and 6e);
- viii. Should any officer or member of the Forum Council resign or otherwise leave the Forum Council before the end of their term then a temporary replacement for any such lapsed member may be selected by the Forum Council from the membership of the Forum who will then take the lapsed member's place on the Forum Council until the next AGM. In such cases where an Officer position becomes vacant then their replacement shall be found from among the pre-existing members of the Forum Council;
- ix. During Forum Council meetings any Forum Council member having a personal or business interest in any decision of the Forum Council must declare that interest and the Forum Council shall have the discretion to exclude that member from that decision;
- x. The Chairman may exercise a second, casting vote after any vote on the Forum Council when there is a deadlock due to a tie.

8. FORUM COUNCIL

The Forum Council shall be elected at an Annual General Meeting of the Forum and shall consist of a minimum of 9 (nine) members up to a maximum of 16 (sixteen).

9. OFFICERS OF THE FORUM COUNCIL

The role of any officer of the Forum Council may be shared by two members of the Forum Council.

- a) The Chairman of the Forum Council shall be responsible for:
 - i. Calling and chairing meetings of the Forum Council, General Meetings and Annual General Meetings of the membership of the Forum, unless specifically delegated to the Vice Chairman in writing;
 - ii. Exercising a casting vote on elections and resolutions at meetings of the Forum and its Council;
 - iii. Have the power to take decisions on urgent matters between meetings of the Forum Council
 - iv. The holder of the office of Chairman shall also be entitled to use the title and style "Honorary Headborough of the Parish and Hamlet of Spitalfields". This is a heritage title of long standing in Spitalfields that symbolically connects Forum with past representative bodies;
 - v. The title and office of Chairman is synonymous to and interchangeable with that of Chairwoman.

- b) The Vice Chairman of the Forum Council shall be responsible for:
 - i. Calling and chairing meetings of the Forum Council, General Meetings and Annual General Meetings of the membership of the Forum, if specifically delegated to by the Chairman in writing.
 - ii. Exercising a casting vote on elections and resolutions at meetings of the Forum and its Forum Council where the Chairman is absent in accordance with rule 9(a)i.
 - iii. The title and office of Vice Chairman is synonymous to and interchangeable with that of Vice Chairwoman.
- c) The Treasurer shall be responsible for:
 - i. Maintaining the financial records of the Forum.
 - ii. Be responsible for presenting the accounts for the year, and a budget for the following year at the Forum Annual General Meeting.
 - iii. Submit a detailed summary of the accounts at every Forum Council meeting.
 - iv. Act as a joint signatory on the Forum account with one other member of the Forum Council.
 - v. Taking the minutes if the Secretary is absent.
- d) The Secretary shall be responsible for:
 - i. Organizing meetings, taking and circulating the minutes and making them available to members within 10 (ten) working days of the previous meeting.
 - ii. Maintaining a register of members of the Forum and the Forum Constitution for inspection by members of the public and Forum Members.

10. THE FINANCES OF THE FORUM

- a) Any money acquired by the Forum, including donations, contributions and bequests, shall be paid into an account operated by the Forum Council in the name of the Forum.
- b) All funds must be applied to the objectives of the Forum and for no other purpose.
- c) Bank accounts shall be opened in the name of the Forum. Any deeds, cheques etc relating to the Forum's bank account shall be signed by at least 2 (two) Forum Council members, 1 (one) of whom must be the Treasurer
- d) Any income/expenditure shall be the responsibility of the Treasurer who will be accountable to ensure funds are utilised effectively and that the Forum stays within its budget.
- e) Official accounts shall be maintained, and will be examined annually by an independent accountant who is not a member of the Forum.
- F) An annual financial report shall be presented by the Treasurer at the Annual General Meeting of the Forum.

11. NEIGHBOURHOOD PLANNING

- a) Any decision to submit to the local planning authority for approval any Neighbourhood Development Plan shall be subject to a vote at a General Meeting of the Forum.
- b) All consultation on the Neighbourhood Development Plan will take place with residents and businesses in the neighbourhood area whether members of the Forum or not.

- c) The Forum Council shall be delegated to work with the local planning authority and any independent experts and advisors on the Neighbourhood Development Plan as they see fit.
- d) At the discretion of the Forum Council working groups can be delegated the tasks of preparing the Neighbourhood Development Plan and may co-opt non-voting members onto such working groups as it sees fit. All such working groups must include at least one Forum Council member

12. ALTERATION OF THE CONSTITUTION

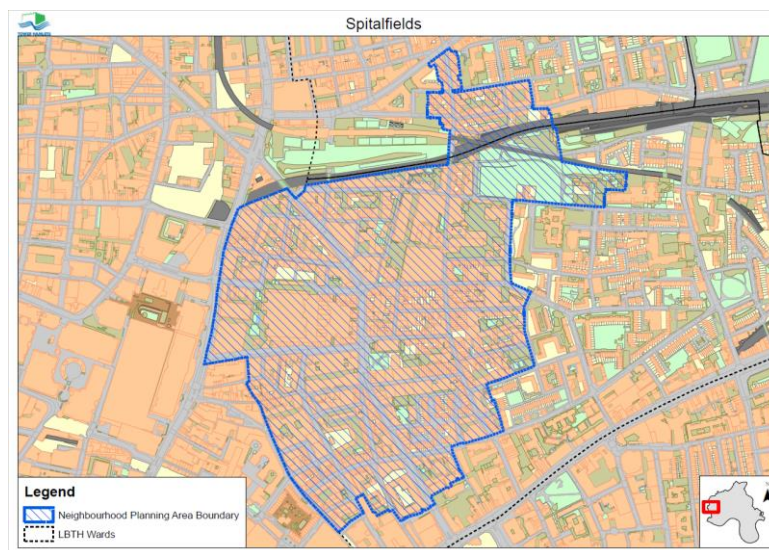
- a) Any changes to this constitution must be agreed by a majority vote at an AGM or at a special general meeting, called specifically for the purpose under the same conditions that apply to Annual General Meetings specified above.
- b) Proposed amendments to this Constitution or dissolution of the Forum must be conveyed to the Secretary formally in writing. The Secretary and other officers of the Forum shall then decide whether to put the proposed amendments to a special general meeting of the Forum for discussion and decision.
- c) Further explanations and clarifications of some parts of this Constitution are found in Standing Orders.
- d) Standing Orders are made and amended by the Forum Council.
- e) The Forum Council must notify the General Membership when Standing Orders are made or amended.

13. DISSOLUTION

The Forum may be dissolved if deemed necessary by the members in a majority vote at a special meeting. Any assets or remaining funds after debts have been paid shall be returned to their providers or transferred to local charities or similar groups at the discretion of the Forum Council.

This Constitution was first drafted by the Interim Steering Group of the Forum on 15 April 2014 and was subsequently amended. It was formally adopted at the Inaugural General Meeting of the Forum on 18 August 2014 (as version 1.6) and officially approved by the London Borough of Tower Hamlets on 5 April 2016. It was then amended (as version 2) by the Forum at a Special General Meeting held on 26 April 2016. Version 2.2 is the current version adopted 30 October 2018.

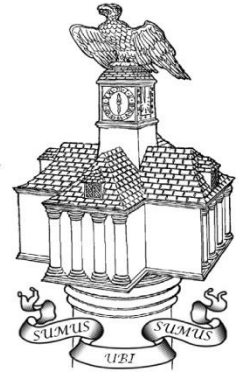
Figure 1: SPITALFIELDS NEIGHBOURHOOD PLANNING AREA



The Spitalfields Neighbourhood Planning Area (shown in blue) was designated as a neighbourhood business planning area by the London Borough of Tower Hamlets on 5 April 2016 and adopted at a Special General Meeting of the Forum on 26 April 2016.

Spitalfields Forum

Spitalfields Neighbourhood Planning Forum



STANDING ORDERS

These Standing Orders are established under Section 12(c) of our Constitution (2018) and are organised in sections which correspond to those in that document.

6. Membership

- a. Organisations eligible for Membership in the Organisations category are limited to non-profit, charity, volunteer and resident representative organisations
- b. Membership of the Forum in the Business Operators category is open to anyone who works in the neighbourhood area

7. Forum Meetings

- a. Elections to the Forum Council will be by secret ballot managed by the Secretary of the Forum who may appoint election monitors to assist
- b. Members shall be verified at the start of Annual General Meetings and issued with ballot papers for elections to the Forum Council organised in separate rounds for each category of membership: business; organisations; residents. Elections shall take place in these categories and in that order
- c. At the start of each election round the confirmed candidates shall, in alphabetical order, make themselves known to Members and speak briefly (or have a statement read out on their behalf) in support of their candidacy. When all the candidates have been accounted for the voting shall take place by way of a ballot box circulated around the room until all members present have had a reasonable opportunity to cast their vote. The votes shall then be counted in public by the Secretary and the numbers confirmed by the Chairman before an announcement of the results is made
- d. Members have the same number of votes to cast in each round of the election, as there are seats on the Forum Council in that category; that is to say they shall have four votes for business; four votes for organisation and eight votes for residents
- e. All Members of the Forum may vote in each category provided they have been a Member for a minimum of three months at the time of the meeting
- f. Proxy voting will be allowed on the basis of a maximum of one proxy per person. An absentee Member must notify the Secretary of their intention to nominate a named Proxy to vote for them in their absence by writing to the Secretary by email before midday on the day of the Annual General Meeting
- g. Candidates standing for election to the Forum Council will be asked by the Secretary and may choose to submit up to 100 words giving their background, details and main policies for distribution to Members preferably ten working days in advance of the Annual General Meeting

- h. Candidates standing for election to the Forum Council must stand in the category of their membership. Members may only change their membership category with the prior agreement of the Forum Council and may not do so in order to stand as a Candidate in an election to the Forum Council after the deadline (s.7.b.vi) for nominations has closed. If a Candidate has recently changed their membership category this will be indicated in the information provided about Candidates standing for election as once nominations have closed
- i. Members of the Forum Council shall be required to declare certain aspects of their personal, business and pecuniary interests. Such interests could be defined as:
 - i. Owning property in the neighbourhood area as their residence
 - ii. Owning a residential or commercial property in the neighbourhood area for the purpose of renting
 - iii. Owning or being a significant decision maker in a business in the neighbourhood area
 - iv. Having a significant decision making or influencing role in other business(es) within the neighbourhood area
 - v. Sponsorship received or economic interest gained in respect of carrying out duties as a member of the Forum Council of the neighbourhood forum
 - vi. Taking business or maintaining client relationships with companies that have, had, or could be perceived as having, a potential business or pecuniary interests in any matters affected by town planning in the neighbourhood area
 - vii. Acting as a consultant to any third parties that could give or be perceived as giving that party a business, pecuniary or commercial advantage in matters relating to town planning in the neighbourhood area
 - viii. Any other relationship or situation (such as that of a spouse or other close family member) which could call into question the neutrality and probity of any member of the Forum Council of the neighbourhood forum
- j. The Council will have the option to vote on a recommendation; e.g. that an individual should withdraw from a working group or decision of the Forum Council *et cetera*
- k. The Council collectively does not have the authority to permanently exclude anyone from the Council due to a perceived conflict of interest

Designation of Spitalfields Neighbourhood Planning Forum Consultation Statement January 2021

Introduction

1. On 25 November 2020, the Spitalfields Neighbourhood Forum applied to the Council to be designated as the Neighbourhood Planning Forum for the Spitalfields Neighbourhood Planning Area. The application was assessed to be in keeping with the relevant regulations, and in accordance with Regulation 9 of the Neighbourhood Planning (General) Regulations 2012 a public consultation period was held between 3 December 2020 and 22 January 2021. This was more than the required 6 weeks, in order to account for the holiday period which fell in the middle of the consultation, and to ensure that all interested parties had suitable opportunity to submit responses.
2. This document provides a summary of matters raised during the consultation period. The report takes account of relevant planning matters in representations submitted to the London Borough of Tower Hamlets. This paper has been prepared for public information and to inform the Council's decision making process – it is not intended to address any of the issues raised during the consultation period.

Consultation activities undertaken by the Council

3. Consultation activities undertaken by the Council were carried out in accordance with the Neighbourhood Planning Regulations and the principles expressed in the Council's Statement of Community Involvement. The activities undertaken were as follows:
 - The application form, supporting materials, and consultation information were placed on the Council's website
 - The same information was sent directly to the elected councillors for the Weavers and Spitalfields and Banglatown wards
 - An email announcing the consultation and explaining where the relevant information could be found was sent to everyone on the Plan Making Team's consultation database
 - A public notice was published in the Docklands & East London Advertiser
 - Due to government guidance around the coronavirus pandemic, hard copies of the consultation material were not made available at the Town Hall or in Idea Stores close to the neighbourhood planning area on this occasion – respondents were encouraged to contact the Plan Making team if this caused any difficulties

Approach to categorising representations made

4. During the public consultation period, the public are able to make representations on the contents of forum application submitted to the

Council. Typically, representations are made by local residents, local Councillors, landowners, businesses, interests groups, statutory consultees and neighbouring Local Authorities. Representations were not made by all parties directly consulted.

5. The following categories have been used to categorise representations:

Support	Have stated explicit support, or support has been inferred from the contents of the representation
Object	Have stated explicit objection, or objection has been inferred from the contents of the representation
Neutral	Have offered comments but not determined if they object or support the application
Petition	A written objection signed by multiple signatories
No comment	Where no comment has been made and no position on the matter can be inferred
Concerned	Do not state they object but highlight areas of concern

6. The following summaries have been derived from an analysis of the consultation responses. Please note, representations did not always specify support or objection to the area and Forum. The summary of responses paraphrases comments made by representors and, to avoid repetition, makes reference to the same matter once only.

7. When analysing the representations, regard is given to legislative requirements related to the Forum and Area proposals.

Summary of representations

Number of representations received

Support	Objection	Neutral	No comment	Petition	Concerned	Total
10	0	2	5	0	0	17

8. A total of 17 responses were received to the consultation.

9. No comment: One of the responses, from Sport England, provided generic comments on the role of sports in neighbourhood planning, but did not address any of the specifics of this particular neighbourhood forum application. Transport for London, Natural England, the Canal and River Trust, and the Environment Agency stated they have no comments to make on the application.

10. Neutral: Historic England stated they have no objection to the application, and did not wish to provide detailed comments. The Port of London Authority also stated they have no objection.

11. Positive: Ten positive responses to the application were received, four from organisations based in the local area, and six from residents. The Attlee Centre said that the Forum are 'organised, well run and have worked tirelessly to make improvement for our area'. The Spitalfields Community Group said 'we remain convinced that the work they [the Forum] do is hugely beneficial for those who live and work in Spitalfields'. The Spitalfields Trust said that 'the Forum has been influential in increasing the diversity and inclusion of voices in the effort, and has worked hard and very effectively to improve the liveability of Spitalfields'. The Spitalfields Society said that the Forum's membership is 'very well informed, highly diverse, and genuinely representative of the range of residents and businesses in the area'. All four organisation explicitly stated that they support the renewal of the forum designation.
12. The positive responses received from residents included the following comments:
- The Forum has engaged many people and a wide range of the community
 - The Forum is well organised (two separate responses raised this point)
 - The Forum has developed a high-quality neighbourhood plan
 - The Forum has demonstrated clear thinking and a sense of purpose in addressing the neglect and decline of Spitalfields
 - The Forum has worked hard to reach the current stage of developing a neighbourhood plan, and this work should continue
 - The forum has people from a broad range of backgrounds involved

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Equality Impact Analysis Initial Screening Tool

Section 1.0: Background Information

Name of Completing Officer:	Steven Heywood
Date of Initial Screening:	10/12/2020
Service Area & Directorate:	Strategic Planning, Place
Head of Service:	Ann Sutcliffe

Section 2.0: Summary of policy, proposal or activity being screened

Name of policy, proposal or activity:
Neighbourhood Planning: Determination of Spitalfields Neighbourhood Forum Application
What are the aims / objectives of the policy, proposal or activity?
To assess an application for a neighbourhood forum designation in the Spitalfields Neighbourhood Planning Area.



Section 3.0: Equality Impact Analysis Test:

Is there a risk that the policy, proposal or activity being screened disproportionately adversely impacts (directly or indirectly) on any of the groups of people listed below ?	Yes	No	Comments :
<p>Please consider the impact on overall communities, residents and Council employees.</p> <p>This should include people of different:</p>	✓	✓	
<ul style="list-style-type: none"> ▪ Sex 		X	
<ul style="list-style-type: none"> ▪ Age 		X	
<ul style="list-style-type: none"> ▪ Race 		X	
<ul style="list-style-type: none"> ▪ Religion or Philosophical belief 		X	
<ul style="list-style-type: none"> ▪ Sexual Orientation 		X	
<ul style="list-style-type: none"> ▪ Gender re-assignment status 		X	
<ul style="list-style-type: none"> ▪ People who have a Disability (Physical, learning difficulties, mental health and medical conditions) 		X	
<ul style="list-style-type: none"> ▪ Marriage and Civil Partnerships status 		X	
<ul style="list-style-type: none"> ▪ People who are Pregnant and Maternity 		X	
<p>You should also consider:</p> <ul style="list-style-type: none"> ▪ Parents and Carers ▪ Socio and Economic status ▪ People with different Gender Identities e.g. Gender fluid, Non Binary etc. 		X	For all characteristics: the Forum has adopted a written constitution that allows membership for all people who live, work, carry out business, or are elected representatives of the neighbourhood planning area, without discriminating against any of the protected characteristics or the additional characteristics considered through this tool.

If you have answered **Yes** to one or more of the groups of people listed above, **a full Equality Impact Assessment is required.**

The only exceptions to this are listed in sections 5.1 and 5.2 of this document.



Section 4.0: Justifying Discrimination:

Are all risks of inequalities identified capable of being justified because there is a:

(i) *Genuine Reason* for implementation

(ii) The activity represents a *Proportionate Means* of achieving a *Legitimate Council Aim*

(iii) There is a *Genuine Occupational Requirement* for the council to implement this activity

Section 5.0: Conclusion

Before answering the next question, please note that there are generally only two reasons a full Equality Impact Analysis is not required. These are:

5.1 The policy, activity or proposal is likely to have **no or minimal impact** on the groups listed in section three of this document.

5.2 Any discrimination or disadvantage identified is **capable of being justified** for one or more of the reasons detailed in the previous section of this document.

5.3 Conclusion Details:

5.4 Do you recommend a fully Equality Impact Analysis is performed ?
 Yes No

5.5 Reasons a full Equality Impact Analysis is not required:

The proposal related to the designation of a neighbourhood forum. The proposed forum has a written constitution that allows membership to all people with a geographical link to the relevant area, without discriminating against any of the protected characteristics. It is therefore expected that there will be no impact on any groups with protected characteristics as a result of this proposal.

If you have answered **YES** to this question, please proceed to section 6.0 Sign Off.


If you have answered **NO** to this question, please detail your reasons in section 5.5 (across) before proceeding to section 6.0 Sign Off.

Section 6.0: Sign Off:

Signed Date:

Name: Position:

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<p>Cabinet</p> <p>3 March 2021</p>	 <p>TOWER HAMLETS</p>
<p>Report of: James Thomas, Corporate Director, Children and Culture</p>	<p>Classification: Unrestricted</p>
<p>Report on the outcome of representations received in response to the statutory (public) notice to amalgamate Cubitt Town Infants and Junior Schools</p>	

Lead Member	Councillor Asma Begum, Deputy Mayor for Children, Youth Services and Education
Originating Officer(s)	Terry Bryan, Service Head (Pupil Services and School Sufficiency) Ikwi Mkparu, School Organisation and Place Planning Manager
Wards affected	All wards
Key Decision?	Yes
Forward Plan Notice Published	3 rd December 2021
Reason for Key Decision	To be 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.
Strategic Plan Priority / Outcome	Children and young people are protected so they get the best start in life and can realise their potential

Executive Summary

This report informs cabinet of the outcome of the four week period of public representation in response to the statutory notice on the proposal for the amalgamation (merger) of Cubitt Town Infant and Cubitt Town Junior Schools. This would create a single three form entry primary school and require the closure of Cubitt Town Infants School.

It recommends for the cabinet to consider a decision on whether or not to formally proceed with plans for the schools amalgamation that would take effect from the 1st April 2022.

RECOMMENDATION:

The cabinet is recommended to:

1. Consider the report and supporting documentation, particularly the statutory notice at Appendix 1 and the Equalities Assessment at Appendix 2, along with any comments and or objections made by respondents to the Statutory Notice.
2. Agree to proceed with plans for the amalgamation (merger) of Cubitt Town Infants and Junior Schools into an all-through 3 to 11 years' primary school to be completed by 1st April 2022.

1. REASONS FOR THE RECOMMENDATION

- 1.1 The recommendation is made in order to determine the council's response to representations received following the statutory notice.
- 1.2 following the recent retirement of the headteacher of Cubitt Town Infants' and after the schools governing bodies considered it was now the right time to join together to become a single 3-11 Primary School. The amalgamation is also considered in view of the earlier Ofsted Inspection, where Cubitt Town Infants was found to 'require improvement' with emphasis on the school needing to improve its leadership and management. In contrast the Junior School is rated as 'good' with a determined and strong leadership team that works well together. The proposal for an amalgamation of the two schools has been put forward
- 1.3 An amalgamation will also enable the better use of educational resources including teaching and non-teaching staff. In terms of management and administration, it will avoid duplication, improve efficiencies and maximise resources. Having a single governing body to drive the school's strategic planning and monitor whole school development will ensure robust accountability and provide a single school at the heart of the local community.
- 1.4 This amalgamation would be achieved through the technical closure of Cubitt Town Infants School and extending the pupil age range of Cubitt Town Junior school, to accommodate the displaced pupils. The remaining primary school (3-11) would retain its original school Department for Education (DfE) number, as it is not a new school, even though its phase has changed.
- 1.5 In line with DfE guidance (November 2019), 'Making significant changes (prescribed alterations) to maintained schools' and 'Opening and Closing Maintained Schools', first stage public consultation has been undertaken, and a statutory notice inviting further representation has been published.

2. ALTERNATIVE DECISIONS

- 2.1 The Mayor could decide not to agree to the recommendation for the schools amalgamation. In which case the schools would continue as separate institutions and seek to find alternative ways to work together to gain most benefit from their expertise and resources.
- 2.2 The Mayor could decide to delay his decision on the schools amalgamation. However, this could mean the amalgamation taking place later than the proposed date of 1st April 2022, by which time the position for both schools may be less advantageous and the uncertainty unsettling for children, staff and parents,

3. DETAILS OF THE REPORT

- 3.1 Following a report to cabinet on 21st October 2020, the Mayor agreed for the council to proceed with the issuing of a statutory notice for 28 days, in respect of the proposal to amalgamate Cubitt Town Infants and Junior Schools into an all-through 3 to 11 years' primary school. The main facts and the reasons for this decision are set out in both the October cabinet report and also in the earlier first stage public consultation paper attached as Appendix 3.
- 3.2 Notification of the publication of the statutory notice was advertised widely, in line with DfE guidance. It was posted publicly outside the schools and on the schools and council websites on the 16th November 2020. It was also published in East London Advertiser Newspaper on the 19th November 2020. All parents and staff received a copy of the notice, and other stakeholders were signposted to the schools and Council websites.
- 3.3 Due to coronavirus it was not possible to hold the traditional method of public and parents' meetings for both the first stage consultation and the subsequent statutory notice period. However, several alternative methods were used, in accordance with the Tower Hamlets guidance on public consultation processes during coronavirus. These methods are explained below and in the report on the outcome of the first stage public consultation, included as Appendix 4.
- 3.4 Prior to the start of the consultation, the Local Authority's independent consultant held a series of preparatory meetings with both Cubitt Town schools to discuss the background and process for the consultation. These included separate meetings with the head teacher and chairs' of governors, the governing bodies, the school's senior leadership teams and schools' staff. The following formal meetings were then held as part of the consultation, to give consultees the opportunity to ask questions and make their views known:

Parents (including wider public)	Information available online and in school newsletters during the Summer and Autumn 2020.
	Virtual Meetings 9.30 and 6pm 6 th July 2020
School Staff	121 meetings offered 6 th July 2020
	Both Headteachers updated staff during meetings in Summer and Autumn Terms 2020.
	Trade Unions have been also been briefed on the consultation during the Summer and Autumn Terms 2020.

- 3.5 The schools have worked with pupils to help them understand the proposal, seeking to reassure them that they would be fully supported throughout this period. This included age appropriate activities when consulting pupils on their views, as part of the schools on-line teaching provision in the Summer Term 2020.

4. RESPONSES TO THE STATUTORY NOTICE (Second Stage Consultation)

- 4.1 The statutory notice period provided a further opportunity to engage with stakeholders and obtain their views, following on from the earlier first stage consultation.
- 4.2 The further period of public consultation did not result in any further representation. There is therefore no reason for the Local Authority to reconsider its recommendation for the amalgamation of Cubitt Town Infants and Cubitt Town Junior Schools. **Page 309**

- 4.3 The Executive Headteacher reports that staff, parents and children are relaxed about the changes, though a few staff are concerned about future staff structure changes where there are duplications of staff roles. Good progress is being made towards integrated policies and processes.
- 4.4 Both schools are in financially healthy positions and have not been affected by falling roles. They expect to be able to manage and staff changes mainly through natural wastage, but, if this changes, full HR consultation could be completed before April 22nd 2022.

5. TIMETABLE FOR IMPLEMENTATION OF THE AMALGAMATION

- 5.1 If the decision is made for Cubitt Town Infant and Junior Schools to amalgamate, the timetable for implementation will be as follows:

April – Sept 2021	The LA, schools and THEP will work together to plan and finalise arrangements and the new staffing structures for the new primary school. This planning will also include minor capital works being undertaken to enable the primary school to operate as one set of buildings.
Sept -Dec 2021	Staff consultation will be undertaken on the new staffing structure for the primary school in the Autumn 2021.
March 2022	Cubitt Town Infants School will formally close on the 31 st March 2022 and Cubitt Town Junior will convert to an all-through (3-11) primary school. Children from Cubitt Town Infants will automatically transfer to the all-through primary school.
April 2022	Cubitt Town Primary School will officially operate from the 1 st April 2022.

6. EQUALITIES IMPLICATIONS

- 6.1 When making decisions the Council must act reasonably and rationally. It must take into account all relevant information and disregard all irrelevant information and consult those affected, taking into account their views before final decisions are made. It must also comply with its legal duties, including relating to equalities.
- 6.2 An Equalities Assessment has been conducted by the LA and is attached at Appendix 2. This must be considered in detail when the Mayor in cabinet considers the matters above, as part of his decision on whether the two schools should amalgamate.
- 6.3 Governors and the LA have considered carefully whether changes may affect particular groups disproportionately. They have worked with Trade Unions to ensure the planning for staff changes is in line with agreed policies and therefore fair and equitable.
- 6.4 The equalities assessment has found that there are no obvious equalities issues arising from this proposal, either for staff, parents or children.

7. OTHER STATUTORY IMPLICATIONS

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.

(i) Managing the Impact of Proposed Closure on School Staff

- 7.1 The LA and School Governing Bodies are working together to support the schools staff through this change. A formal staff consultation will take place following a final decision on the schools amalgamation. However, the financial position of both schools is healthy, and any staff changes for 1st April 2022 can be managed through natural wastage.

(ii) Best Value Implications

- 7.2 The proposal is an integral part of the Council's Primary School Review Strategy. It will support the quality of educational opportunity for the children, providing access to additional resources and space, and pooling the significant expertise across both schools.
- 7.3 The proposal does not have any significant mainstream revenue or capital implications for the Council. Minor capital investment will be needed to create a single main entrance; new reception and visitors area; combined general office for the administrative staff; and a single staffroom and kitchenette for all staff. The intention is for the works to be completed over the school summer holidays in 2021.

- 7.4 When a school closes its finances (and any surplus or deficit) is returned to the LA. In the case of this amalgamation the Statutory Notice has made clear that any remaining balances from the closing school (Cubitt Town Infants) would be transferred to Cubitt Town Juniors on the last business day of its operation.
- 7.5 Upon closure of Cubitt Town Infants, 85% of the annual lump sum would be paid to the amalgamated school the year after amalgamation to support transition.

(iii) Environmental (including air quality)

- 7.6 There are no environmental issues arising from this proposal.

(iv) Risk Management

- 7.7 If this recommendation is agreed, continuation of the schools amalgamation process will be carefully managed and evaluated in line with statutory guidance and taking account the views of stakeholders in order to reduce and mitigate risks. The LA is working with both schools to support them in mitigating this risk. The provision for children with Special Educational Needs will not be affected by this proposal.

(v) Safeguarding

- 7.8 The report deals with the council's approach to managing the supply of school places for the local population. The efficient supply of school places contributes to the safeguarding of children by ensuring their continued access to good quality, sustainable education provision.

(vi) Data Protection / Privacy Impact Assessment

- 7.9 The proposals presented in this report have followed an initial and formal public consultation using a variety of mechanisms. All responses received through these mechanisms or made directly to council officers or members have been included in the analysis of the feedback received. These responses have only been used to assess the community's view of the proposals and not for any other purpose.
- 7.10 The council handles information in accordance with the Freedom of Information Act 2000 and the Data Protection Act 2018 and is the data controller for the purposes of the Data Protection Act 2018. For more information, the privacy notice for Pupil Services can be accessed here.

8. COMMENTS OF THE CHIEF FINANCIAL OFFICER

- 8.1 The School receives all revenue funding from the dedicated schools grant (DSG) and the amalgamation would be reflected in the allocation from the DfE. There would be no cost to the general fund and the school would be able to make significant economies of scale by running as one institution.

9. COMMENTS OF LEGAL SERVICES

- 9.1 Section 14 of the Education Act 1996 requires local authorities to provide sufficient schools for primary and secondary education in their area. Local authorities also have best value duties in the performance of their functions under the Local Government Act 1999.

9.2 The procedure for amalgamating schools is set out in the Education and Inspections Act 2006, the School Organisation (Establishment and Discontinuance of Schools) Regulations 2013, and the statutory guidance 'Opening and Closing Maintained Schools' (November 2019). The proposals set out in this report comply with the above legislation and guidance.

Linked Reports, Appendices and Background Documents

Linked Report

- 21st October Cabinet Report - Outcome of the 1st stage consultation on the proposal for the amalgamation of the Cubitt Town Infant and Cubitt Town Junior Schools.

Appendices

Appendix 1	Statutory (Public) Notice (2 nd stage consultation)
Appendix 2	Equalities Assessment
Appendix 3	Public Consultation Paper (1 st stage consultation)
Appendix 4	Public Consultation (1 st Stage) Feedback Report

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

The following document(s) has been used in the preparation of this report:

- 'Opening and Closing Maintained Schools – Statutory Guidance for Proposers and Decision- Makers' (November 2019) in conjunction with Part 2 and Schedule 2 of the Education and Inspections Act (EIA) 2006 as amended by the Education Act (EA) 2011
- The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013

Officer contact details for documents: N/A

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Consultation information:

Statutory notice on the proposal to amalgamate (combine) Cubitt Town Infants and Cubitt Town Junior Schools

16 November 2020



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Introduction

On Wednesday 21 October 2020 Tower Hamlets Cabinet approved the recommendation to publish a statutory notice on the proposal to combine (amalgamate) Cubitt Town Infants and Cubitt Town Junior Schools.

Notice is given in accordance with The School Organisation (Establishment and Discontinuance of Schools) Regulations 2013 that Tower Hamlets local authority intends to discontinue Cubitt Town Infants School by 31 March 2022. This notice includes the local authority's proposal to make a prescribed alteration to Cubitt Town Junior School, to change the lower age limit to create an all-through primary school, in accordance with The School Organisation (Prescribed Alternations to Maintained Schools) (England) Regulations 2013.

Contact details

Name and address of local authority publishing the proposal:

Tower Hamlets Council, Town Hall, Mulberry Place, 5 Clove Crescent, London E14 2BG.

Name, address and category of schools proposed to be amalgamated:

Cubitt Town Infants and Junior Schools, Manchester Rd, Isle of Dogs, London E14 3NE.

Implementation

Date on which it is proposed to amalgamate the schools:

Further to the initial proposed implementation date of 1 September 2021, the governors and executive headteacher of both schools requested for the implementation date to be changed to 1 April 2022. This is to allow more time to prepare the schools' financial, staffing and curriculum models, and to ensure that they are better aligned before the amalgamation.

It is proposed to implement the amalgamation as follows:

Cubitt Town Infants School will close from Wednesday 31 March 2022.

Cubitt Town Junior School will alter its age range and convert to a three form entry all through Primary School (90 Places in each year group) from 1 April 2022.

All children attending Cubitt Town Infants School will transfer to the new Cubitt Town Primary School from 1 April 2022. Children currently attending Cubitt Town Junior School will continue in the new primary school.

Reason for amalgamation

The council, in partnership with the governing bodies of Cubitt Town Infants and Junior Schools, is proposing that the two schools amalgamate to become one primary school from the 1 April 2022, admitting pupils from three to eleven years of age. This will include the current nursery provision at Cubitt Town Infants.

The council's education policy is to move towards integrated three to eleven primary school provision, rather than maintain separate Infant and Junior Schools. This is beneficial to children's education because it reduces the stress caused by transition and optimises the expertise of the staff across the primary age range.

Both Cubitt Town Infant and Junior Schools already work closely together and engage in joint planning. Following the recent retirement of the Infant School Headteacher, the governing bodies and the local authority have reviewed the future for both schools and consider that now is the right time for both schools to combine to become a single Primary School (see **Appendix 1** for the stage one consultation).

Pupil numbers and admissions

The numbers for whom provision is currently made at the school:

Cubitt Town Infants is a co-educational mainstream school for pupils aged four to seven with a nursery provision for children from three-year-old. The School has a published admission number (PAN) of 90 for each year group. As at 1 September 2020 the School had 359 pupils on roll.

Cubitt Town Junior School is a co-educational mainstream school for pupils aged seven to eleven. The School currently has a PAN of 90 for each year group. As at 1 September 2020 the School had 354 pupils on roll.

The PAN for each year group of the new three to eleven-years-old primary school will be 90.

Displaced pupils

This proposal forms part of an amalgamation, and therefore no pupils will be displaced. From 1 April 2022, pupils currently at Cubitt Town Infants School will have places at Cubitt Town Primary School. The current Year 3 PAN at Cubitt Town Junior School will be removed, and pupils in Year 2 will automatically transition to Year 3 in the primary school.

Impact on the community

Cubitt Town Infants and Junior Schools serve the same geographic area and are adjacent to each other. The proposal will provide certainty of progression to the junior phase and offer an all-through primary education. Therefore, it is not anticipated that there will be any adverse impact on the community.

Rural primary schools

Not applicable.

Balance of denominational provision

Not applicable.

Nursery provision

It is intended that the current nursery at Cubitt Town Infants will continue to operate under Cubitt Town Junior School through the proposal to alter its lower age limit.

There will be no change for children in the current setting – the location and staff will remain the same. Therefore, the provision will continue to be accessible and convenient for local families.

Sixth Form provision

Not applicable.

Special educational needs provision

The schools do not provide educational provision recognised by the local authority as being reserved for children with special educational needs.

There are 38 pupils on roll at Cubitt Town Infants School who have been identified as having special educational needs, of whom there are six pupils with an education health and care plan (EHCP).

There are 32 pupils on roll at Cubitt Town Junior who have been identified as having special educational needs, of which there are 13 pupils with an EHCP. Both schools have fully accessible buildings and currently share the same site. Special educational needs children will continue to receive the same high levels of support in the primary school.

Travel

There will be no change to the travel distance for the children currently attending Cubitt Town Infants School as they will continue to attend the same site at Manchester Rd, Isle of Dogs, London E14 3NE.

Finances

The Cubitt Town Infants and Junior schools financial balances will be transferred by 31 March 2022 to the new Cubitt Town Primary School, as part of the school's budget from 1 April 2022.

Procedure for making representations (objections and comments)

Within four weeks from the date of publication of this statutory notice, any person may object to or make comments on the proposal by email or by post.

Closing date for responses is 5pm, Wednesday 16 December 2020

By email: school.organisation@towerhamlets.gov.uk

By post: School Organisation and Place Planning Manager
Pupil Services and School Sufficiency
Tower Hamlets Children and Culture
Town Hall
Mulberry Place
5 Clove Crescent
E14 5BG

We will not be able to consider any responses received after 16 December 2020.

All responses received during the representation period will be published on the Council's website in early January 2021.

The website address is: talk.towerhamlets.gov.uk/statutory-notice-cubitt-town

Appendix 1

Consultation information:

First Stage consultation feedback report on the proposal for the amalgamation (combine) of Cubitt Town Infants and Junior Schools

1 September 2020

Report compiled by Dr Helen Jenner, Independent Consultant, Tower Hamlets Primary Review.

Introduction

This report summarises the planning undertaken to lead to a public consultation, and the responses to that consultation, on whether Cubitt Town Infant and Junior Schools should support the local authority to formally consult on the amalgamation of the two schools from 1 September 2021.

The report aims to support the school governors to reach an informed decision on the proposal.

Background

Cubitt Town Infant and Junior Schools' Governing Bodies were both prompted, by the prospective retirement of the Infant School Headteacher, to consider how to make the schools' long-term future and quality of education even stronger, ensuring a reduction in the impact of transition between the schools.

The Tower Hamlets Primary Review commissioned an independent consultant, Dr Helen Jenner, to work with schools facing significant change in the borough. As well as working with the schools, Dr Jenner was asked to produce a public report "Future Ambitions"¹ setting out principles for developing school relationships for resilience and excellence.

This document was shared with all Headteachers, Unions and Governors in March 2019. Regular updates on the Primary Review have been included in the termly Director's Report for Governors. It included the principle of amalgamating Infant and Junior Schools.

Governors planning

A small Steering Group consisting of the Headteachers from both schools, supported by the Independent Consultant, and their Tower Hamlets Education Partnership

¹ https://www.towerhamlets.gov.uk/Documents/Children-and-families-services/Schools/Primary_Review/Future_Ambitions_report_from_the_independent_consultant_Feb_2019.pdf

(THEP) school improvement partner, has led work on considering the implications of enhanced partnership for the two schools, including the development of draft papers for governing bodies to consider. This included consultation papers circulated to staff, parents and other stakeholders.

Governing Body meetings were set up in the Spring Term 2020 at both schools to discuss partnership working, and the possibility of moving towards amalgamation.

Staff Meetings were also held in the Spring Term to ensure all staff were clear and had opportunities to ask any questions. Unions were advised of the possibility of amalgamation in March 2020.

Governing bodies considered draft consultation documents in late May/early June, and agreed that this should be circulated to staff and parents on 5 June 2020, with the consultation to run from 8 June to 17 July 2020

Information about the consultation was also placed on the schools' websites.

www.cubittown-jun.towerhamlets.sch.uk/viewer/454

www.cubittowninf.co.uk/school-letters/

Due to Coronavirus it was not possible to hold public meetings regarding the consultation, however, the following options were offered (in line with the Tower Hamlets consultation processes during coronavirus guidance for schools' consultations):

1. A response form (or any other written format) inserted at the end of the consultation document to record stakeholder views. To be posted or emailed to the schools.
2. A box was located at the reception of each school where stakeholders could leave comments, response forms, or ask any questions.
3. The local authority consultant, who is supporting the schools with the consultation process was available for 1-to-1 socially distanced questions/feedback on Monday 6 July from 9am to 2.30pm
4. Virtual meetings were set up on 6 July for staff (4pm) and parents (2.30pm and 6pm).
5. One-to-one phone calls were offered.
6. School staff created age appropriate ways of consulting with our children on their views as part of their online teaching.
7. Staff meetings were held to regularly update staff
8. Trade Unions were briefed on the consultation.

Consultation response

There was very little formal response to the consultation.

One parent requested a phone call, and three staff members attended a Zoom meeting. Informal feedback was very positive. Staff, children and parents see the amalgamation as a natural next step for two successful schools.

Staff fed back positive reasons to support the amalgamation. The increased opportunities for staff, greater range of expertise, potential to share resources and reduction in transition anxiety were all seen as possible positive outcomes.

Staff wanted to be clear on whether there may be staffing reductions and, if that is the case, how would they be addressed. They were advised that it was too early to know what staffing structures there might be, but that the amalgamation is not being seen as a cost saving exercise, so there are no immediate staff reductions proposed, and compulsory redundancy is unlikely. If staffing changes are made the agreed school re-organisation process would be followed.

Professional discussion, and strong engagement from staff, parents and children with the process, puts governors in a strong position to recommend to the local authority that they progress to publish a statutory notice proposing the amalgamation of Cubitt Town Infant and Junior Schools from September 2021.

Trade Unions have confirmed that they have received no queries or concerns regarding the proposal.

Governors should consider this report during the first half of the Autumn Term, so that the Council Cabinet can be notified of their response before they consider the possible statutory notices in October or November 2020. A final decision on the proposal would be taken by the Council Cabinet at their meeting on 3 March 2021.

There is general agreement that amalgamation to become a three to eleven primary school will support children's education and enhance the offer for local families and community.

Based on the informal feedback about the proposal, the positive opportunities it brings, and the very low level of concerns raised, I would recommend that the local authority move to issue statutory notices, with the support of both Governing Bodies.

[ENDS]

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Appendix 2 - Equality Impact Analysis Initial Screening Tool

Section 1.0: Background Information

Name of Completing Officer:	Linsey Bell
Date of Initial Screening:	28 th Aug 2020
Service Area & Directorate:	Pupil Services and School Sufficiency
Head of Service:	Terry Bryan

Section 2.0: Summary of policy, proposal or activity being screened

Name of policy, proposal or activity:

The London Borough of Tower Hamlets, in partnership with the governors of Cubitt Town Infant and Junior Schools, are proposing to merge the two schools to form a three form (3FE) entry 3-11 primary school. This will create a single primary school from the start of the September Term in 2021.

Cubitt Town Infant and Junior Schools' Governing Bodies were both prompted, by the prospective retirement of the Infant School Headteacher, to consider how to make the schools' long term future and quality of education even stronger, ensuring a reduction in the impact of transition between the schools. As a result, the governors have reviewed the future for both schools and consider that now is the right time to become a 3-11 Primary School.

The process to achieve this would involve the 'technical closure' of Cubitt Town Infant School on 31st August 2021 and the expansion, and renaming, of Cubitt Town Junior School to become Cubitt Town Primary School from 1st September 2021. However, it should be noted that there would be no actual closure of school buildings.

What are the aims / objectives of the policy, proposal or activity?

Tower Hamlets has a great tradition of excellent education and values the important role that schools have in increasing the life chances of our children. The proposed amalgamation forms part of a wider review of primary school places across the borough, initiated to enhance the sustainability of schools and their ability to maintain high standards in the face of significant demographic changes in the west and east of the borough.

Tower Hamlets' Education Policy is to move towards integrated 3-11 primary school provision, rather than maintain separate Infant and Junior Schools. This is believed to be beneficial to children's education because it reduces the stress caused by transition and optimises the expertise of the staff across the primary age range.

The proposed amalgamation would build on and strengthen the joint working already taking place across the two schools, to:

- Promote consistency of education, including further opportunities to enhance the educational offer for children by sharing resources and curricular expertise;
- Strengthen consistency of leadership, with both phases led by one Headteacher;
- Promote robust financial stability, with a central budget overseen by a single Governing Body;
- Provide more development opportunities for staff;
- Reduce transition anxiety, with seamless transition from year 2 to year 3;
- Strengthen and continue to develop existing community links;
- Provide continued access for pupils and their families to extended services and facilities.



Section 3.0: Equality Impact Analysis Test:

<p>Is there a risk that the policy, proposal or activity being screened disproportionately adversely impacts (directly or indirectly) on any of the groups of people listed below? This should include people of different:</p>	<p>Yes ✓</p>	<p>No ✓</p>	<p>Comments:</p>																														
<p>Age</p>		<p>✓</p>	<p><u>Pupils:</u> A change to schools during any phase of education can be viewed as possibly disruptive, although there will be no need for any pupils to move to another school under this proposal. The effect on children aged 3-11 will be very minor, with no year group more adversely affected than others. Indeed, year 6 children who left in Summer 2020 will not be impacted, nor will the current year 5 who will also have transitioned to secondary school if this proposal is implemented in September 2021.</p> <p>As the table below shows, pupil numbers are distributed evenly across all year groups, with a slight dip noted in year 5.</p> <table border="1" data-bbox="553 911 2007 1098"> <thead> <tr> <th>Year Group</th> <th>N1</th> <th>N2</th> <th>R</th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>Cubitt Town Infant School</td> <td></td> <td>90</td> <td>90</td> <td>91</td> <td>88</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Cubitt Town Junior School</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>90</td> <td>88</td> <td>86</td> <td>90</td> </tr> </tbody> </table> <p>One of the most significant advantages to an amalgamation would be reduction of anxiety for pupils moving from year 2 to year 3, given that transition would be seamless under the proposed primary school model.</p> <p>As one school is an infant school, and one a junior school, it is difficult to compare educational outcomes on a like for like basis across year groups. However, an Ofsted inspection in 2019 determined that the Infants' School was rated as "Requires Improvement" whilst the Junior School continued to be rated as "Good", maintaining this status since 2012.</p> <p>Cubitt Town Infants School: https://reports.ofsted.gov.uk/provider/21/100932</p>	Year Group	N1	N2	R	1	2	3	4	5	6	Cubitt Town Infant School		90	90	91	88					Cubitt Town Junior School						90	88	86	90
Year Group	N1	N2	R	1	2	3	4	5	6																								
Cubitt Town Infant School		90	90	91	88																												
Cubitt Town Junior School						90	88	86	90																								

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Cubitt Town Junior School: <https://reports.ofsted.gov.uk/provider/21/100898>

Due to the prospective retirement of the Infant School Headteacher, both school Governing Bodies have agreed that the new proposed primary school would be led by the existing Junior School Headteacher. This will ensure enhanced consistency of leadership across both phases of the school, with all pupils benefitting from a leadership approach described as “determined and strong” by Ofsted.

The educational offer for pupils will be enhanced by sharing of educational expertise and resources; infant school teachers judged as needing to “deepen their subject knowledge across a range of subjects” at the last inspection will benefit from the experience of junior school teachers found by Ofsted to be “knowledgeable” and to “understand how to make links between subjects to enhance pupils’ learning experiences.” Behaviour was found to be strong across both schools and it is the expectation that amalgamation will further reinforce this positive aspect for children across all years.

On a day-to-day basis, very little will change for children and the differing needs of each age group will continue to be met. The care and importance given to each individual child, which is a strength of both schools, will remain paramount. In addition, children of all ages will benefit from increased access to school facilities (including outdoor areas) regardless of school phase.

Staff:

The table below shows a similar split in age ranges for each school:

Cubitt Town Infants' School	Staff age range	Total
	25 - 34	11
	35 - 44	7
	45 - 54	12
	55 - 64	12
Cubitt Town Junior School	25 - 34	19
	35 - 44	9
	45 - 54	13
	55 - 64	12
	65 - 74	0
	75 - 84	1

The impact on staff, who will join together to form one staffing structure, is expected to be minimal given all staff employed at the Infant and Junior Schools (at the time of the proposed amalgamation) would automatically continue their employment in



the new primary school and their rights would be preserved under TUPE. No redundancies are expected to occur under the proposal and where there are duplicates of posts, creative solutions will be sought to retain staff. Because of this, no particular age group will be disadvantaged over another.

If the proposal progresses there will be a full HR consultation, following processes agreed with the trade unions, to maximise staff strengths and build on their expertise and good will. In addition, staff across the school would benefit from continuity of staff policies and procedures, and the same dates for staff training days and school holidays.

Sex

✓

Pupils:
The breakdown of boys versus girls is very evenly spread within the junior school, although the infant school roll is slightly weighted more towards boys than girls. Irrespective of gender, all pupils will benefit from the increased long-term educational and financial sustainability that the proposed amalgamation would bring; therefore, no adverse impact is identified regarding this protected characteristic.

	Year Group	Girls	Boys	Total
Cubitt Town Infants' School	N2	44	46	90
	R	39	51	90
	1	40	51	91
	2	34	54	88
	Total	157 (44%)	202 (56%)	359
Cubitt Town Junior School	3	49	41	90
	4	47	41	88
	5	47	39	86
	6	38	52	90
	Total	181 (51%)	173 (49%)	354

Staff:
The staff gender breakdown is weighted heavily towards women at both schools (see table below), as is the case across most primary school provision in the borough and elsewhere. However, as no redundancies are proposed no disproportionate impact on either gender is anticipated.



Staff conditions of service will not be affected, and staff employed at the Infant and Junior Schools (at the time of the proposed amalgamation) would automatically continue their employment in the new primary school, with their rights preserved under TUPE.

	Female	Male	Total
Cubitt Town Infants' School	39	5	44
Cubitt Town Junior School	43	11	54

Race

✓

Pupils:

Cubitt Town Infants' and Junior Schools have a similar pupil demographic in terms of ethnicity, as evidenced below:

Ethnicity	Cubitt Town Infants' School	Cubitt Town Junior School
Any Other Asian Background	5	8
Any Other Black Background	10	3
Any Other Ethnic Group	19	16
Any Other Mixed Background	25	34
Any Other White Background	7	10
Bangladeshi	210	190
Black - Any Other Black African Background	18	16
Black - Somali	0	3
Black Caribbean	0	1
Chinese	2	4
Indian	6	2
Pakistani	2	1
White - British	40	57
White - Irish	2	0
White and Asian	7	1



White and Black African	2	2
White and Black Caribbean	4	4
Refused	0	1
Vietnamese	0	1
Total	359	354

Joining the schools will not cause any significant changes to the pupil demographic of the new school, with Bangladeshi children still the main ethnicity. Both schools have pupils with English as an additional language (EAL) so will be able to share best practice with how to support children who are bi/multi-lingual. All pupils, irrespective of ethnicity, will also benefit from the long term stability that should be achieved through joining the two schools.

	EAL	%
Cubitt Town Infants' School	288	80%
Cubitt Town Junior School	206	58%

Staff:

Both schools have a similar staff demographic in terms of ethnicity (as evidenced below), with white staff in the majority. Under the proposed amalgamation very little change is anticipated for staff on a day-to-day basis and staff conditions of service will not be affected. Because of this, no particular ethnic group will be disadvantaged over another and children of all ethnicities will therefore benefit from the continuity of having the same known staff at the school.

Ethnicity	Cubitt Town Infants' School	Cubitt Town Junior School
Any Other Asian Background	2	0
Any Other Black Background	0	0
Any Other Ethnic Group	0	0
Any Other Mixed Background	0	1
Any Other White Background	2	7
Bangladeshi	7	9
Black – Any Other Black African Background	0	0
Black – Somali	0	1



Black Caribbean	0	0
Chinese	0	0
Indian	1	2
Pakistani	0	1
White – British	32	32
White – Irish	1	0
White and Asian	0	0
White and Black African	0	0
White and Black Caribbean	0	1
Refused	0	0
Vietnamese	0	0
Total	44	54

Page 33	Religion or Philosophical Belief	✓	No impact identified – no data collected and neither school is a faith school.												
	Sexual Orientation	✓	No impact identified – no data collected												
	Gender re-assignment	✓	No impact identified – no data collected												
	People who have a Disability (Physical, learning difficulties, mental health and medical conditions)	✓	The table below shows that the number of children with Education, Health & Care (EHC) Plans is similar across both schools, whilst the number of children on SEN support is higher in the Junior School. Joining the two schools will ensure that a child’s transition from infant to juniors will be seamless, and embed a robust, inclusive approach to supporting children with SEND from age 3 to age 11. It will also maximise resources and ensure that all pupils with SEND have access to enhanced provision.												
			<table border="1"> <thead> <tr> <th></th> <th>SEN Support</th> <th>EHC Plan</th> <th>Grand Total</th> </tr> </thead> <tbody> <tr> <td>Cubitt Town Infants' School</td> <td>16</td> <td>8</td> <td>359</td> </tr> <tr> <td>Cubitt Town Junior School</td> <td>29</td> <td>11</td> <td>354</td> </tr> </tbody> </table>		SEN Support	EHC Plan	Grand Total	Cubitt Town Infants' School	16	8	359	Cubitt Town Junior School	29	11	354
	SEN Support	EHC Plan	Grand Total												
Cubitt Town Infants' School	16	8	359												
Cubitt Town Junior School	29	11	354												
Marriage and Civil Partnerships status	✓	No impact identified – no data collected													
People who are Pregnant	✓	No impact identified – no data collected													



and Maternity															
Parents and Carers		✓	<p><u>Parents:</u> Although there was very little formal response to the consultation, informal feedback was very positive, with staff, children and parents seeing the amalgamation as a natural next step for two successful schools. In addition, joining the two schools would give parents the reassurance that their child will not have to change school after infants, which adds another transition. This is especially important after COVID-19, which caused an unnatural and unexpected break in most children’s schooling.</p> <p>Ofsted reports for both schools note that parental engagement and support is already strong across both schools, including an extensive parental programme of training and workshops centred around Cubitt Town Community House, which Ofsted noted is greatly appreciated by families. Joining the two schools together will allow for this successful approach to be further developed, with the continued strengthening of existing community links.</p>												
Socio and Economic		✓	<p><u>Pupils:</u> Both schools share a very similar socio-economic background, with the proportion of children receiving Free School Meals (FSM) in line across both.</p> <table border="1" data-bbox="548 805 1937 917"> <thead> <tr> <th></th> <th>FSM</th> <th>%</th> <th>Grand Total</th> </tr> </thead> <tbody> <tr> <td>Cubitt Town Infants' School</td> <td>153</td> <td>43%</td> <td>359</td> </tr> <tr> <td>Cubitt Town Junior School</td> <td>159</td> <td>45%</td> <td>354</td> </tr> </tbody> </table> <p>Joining both schools should benefit children of all backgrounds via the sharing of existing good practice, but more vulnerable pupils will particularly benefit from Early Help procedures in the Junior School described as “well-established” by Ofsted, providing “support to vulnerable pupils and their families”, as well as accessing extracurricular experiences “not readily accessible to them outside of the school”.</p> <p>Well received workshops organised through Community House already effectively support parents to further develop their own skills, with past sessions including CV workshops. It is anticipated that an amalgamation will further enhance community links, with shared resources and outreach strategies helping to build upon this already successful programme of activities.</p> <p>Nursery provision will continue to provide the universal 15 funded hours for all 3 and 4 year olds as well as 30 funded hours for 3 and 4 year olds with working parents.</p>		FSM	%	Grand Total	Cubitt Town Infants' School	153	43%	359	Cubitt Town Junior School	159	45%	354
	FSM	%	Grand Total												
Cubitt Town Infants' School	153	43%	359												
Cubitt Town Junior School	159	45%	354												



People with different Gender Identities	<input checked="" type="checkbox"/>	No impact identified – no data collected
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If you have answered **Yes** to one or more of the groups of people listed above, **a full Equality Impact Assessment is required.** The only exceptions to this are listed in sections 5.1 and 5.2 of this document.

Section 4.0: Justifying Discrimination:

Are all risks of inequalities identified capable of being justified because there is a:

- (i) *Genuine Reason* for implementation
- (ii) The activity represents a *Proportionate Means* of achieving a *Legitimate Council Aim*
- (iii) There is a *Genuine Occupational Requirement* for the council to implement this activity

✓

✓
✓

Section 5.0: Conclusion

Before answering the next question, please note that there are generally only two reasons a full Equality Impact Analysis is not required. These are:

- 5.1 The policy, activity or proposal is likely to have **no or minimal impact** on the groups listed in section three of this document.
- 5.2 Any discrimination or disadvantage identified is **capable of being justified** for one or more of the reasons detailed in the previous section of this document.

5.3 Conclusion Details:

5.4 Do you recommend a fully Equality Impact Analysis is performed ?

Yes No

If you have answered **YES** to this question, please proceed to section 6.0 Sign Off.

If you have answered **NO** to this question, please detail your reasons in section 5.5 (across) before proceeding to section 6.0 Sign Off.

5.5 Reasons a full Equality Impact Analysis is not required:

On a day-to-day basis, very little will change for children as there will be no need for any pupils to move to another school under this proposal. As a result, the impact on pupils with protected characteristics will not be significant, with no one group more adversely affected than others.

Similarly, very little change is anticipated for staff on a day-to-day basis under the proposal, as no redundancies are expected to occur because of the amalgamation. All staff employed at the Infant and Junior Schools (at the time of the proposed amalgamation) would automatically continue their employment in the new primary school and their rights would be preserved under TUPE. Where there are duplicates of posts, creative solutions will be sought to retain staff. As a result, the impact on staff with protected characteristics will not be significant, with no one group more adversely affected than others.



Section 6.0: Sign Off:

Signed

Date:

Name:

Position:

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Public Consultation (1st Stage) on the proposal to amalgamate Cubitt Town Infant and Junior Schools to create Cubitt Town Primary School

5th June 2020

The Proposal

The London Borough of Tower Hamlets, in partnership with the governors of Cubitt Town Infant and Junior Schools, are proposing to merge the two schools to form a three-form entry 3-11 primary school. This will create a single primary school from the start of the September Term in 2021.

Why are we proposing the change?

Tower Hamlets Education Policy is to move towards integrated 3-11 primary school provision, rather than maintain separate Infant and Junior Schools. WE believe this is beneficial to children's education because it reduces the stress caused by transition, and optimises the expertise of the staff across the primary age range.

Our schools already work closely together and engage in joint planning. Because our dedicated Infant Headteacher is retiring the governors have reviewed the future for our schools and consider that now is the right time to become a 3-11 Primary School.

How does this affect our Headteachers?

As parents from Cubitt Town Infants will know, Ms Daly has decided to retire at the end of the current school year after a long and successful career. Ms Bruce, the current experienced Head Teacher at the Junior School will move into the role of Executive Head Teacher for both schools, from September 2020 - 2021.

The Governing Bodies from the Infant and Junior Schools have discussed the possible amalgamation and agree that the headteacher post for the new Primary School would not, in effect, be vacant and therefore not subject to advertising or selection requirements, so if the amalgamation does go ahead Ms Bruce would become the Headteacher for the new Primary School.

This would mean that a single headteacher and a single governing body would collectively oversee the running of the Primary School. A single primary school would bring both schools together to become one community, which we believe will be the best for the children.

What are the benefits of becoming a single primary school?

Further opportunities to enhance the educational offer for our children.

Continued access for pupils and their families to extended services and facilities.

The opportunity for both Infant and Junior phases to keep improving and moving forward.

There would be no need for children to apply to the Junior School during Year 2, and transition anxiety would be reduced.

Greater financial stability to make certain we continue to improve and offer world class education.

More development opportunities for the staff, such as shared training and the chance to work more closely across the curriculum and gain experience and understanding of all key stages.

The strengthening and continued developing of community links which already exist.

What will it mean for the children?

The whole purpose of the merger is to create an environment that will have a positive impact on the quality of education that children receive.

In the future there would be the same policies and procedures, and the same dates for staff training days and school holidays.

Increased access to school facilities (including outdoor areas) regardless of school phase.

What will it mean for my child being part of a larger school?

On a day-to-day basis very little will change. The differing needs of each age group will continue to be met.

The care and importance given to each individual child, which is a strength of both schools, will always remain paramount.

What will it mean for the staff?

Again, very little will change on a day-to-day basis. Staff conditions of service will not be affected. All staff employed at the Infant and Junior Schools (at the time of the proposed amalgamation) would automatically continue their employment in the new primary school and their rights would be preserved under TUPE.

Each year, our schools review their staffing. The amalgamation will probably create some new opportunities and changes for staff. If the amalgamation progresses there will be a full HR consultation, following processes agreed with the unions, to maximise staff strengths and build on their expertise and good will. No redundancies are expected to occur because of the amalgamation. Where there are duplicates of posts creative solutions will be sought to retain our excellent staff.

Would there be any changes to the school building?

In the event of merger, the school would remain largely the same with all the existing premises being used in the most appropriate and effective way. Plans are being developed to help improve the entrance to the

school, and other possible minor adaptations.

As we settle in as one school there may be other changes which need to be made to ensure we use all the school space effectively.

Procedure to achieve the merger

It is proposed that Cubitt Town Primary School will open on 1 September 2021 catering for pupils from age 3 to 11.

The process to achieve this involves the 'technical closure' of Cubitt Town Infant School on August 31st, 2021 and the expansion, and renaming, of Cubitt Town Junior School to become Cubitt Town Primary School from 1st September 2021. However, it should be noted there will be no actual closure of school buildings.

Admissions

If the proposal is agreed the Primary School would be created on 1 September 2021 and the following would apply:

- First admissions: Children who have applied for places at Cubitt Town Infants or Junior Schools for September 2021 would be offered places through the standard admissions process, using the new school entrance for measuring distance.
- All children currently attending Cubitt Town Infant or Junior School will automatically join the Cubitt Town Primary School.

Why are we consulting you?

We want to consult you to gather your views because you are part of the school community. The governing body of the schools and the London Borough of Tower Hamlets cannot simply decide to make changes to schools without first seeking the views of parents and others. There is a legal process which must be followed before changes can be made, and it is important that the governing body and the council hear your views before deciding whether to proceed.

We have organised the following opportunities for parents and carers to share views, because of coronavirus these must be social distancing compliant, but we have tried to ensure that everyone has a full opportunity to feed into the consultation.

1. You can use the response form (or any other written format) at the end of this document to record your views. It can be posted to the schools, or emailed to

Consultation email address

2. There is a box in the reception of each school where you can leave your comments, response forms and any questions.

3. The Local Authority consultant, who is supporting the schools with the consultation process will be available for 1 to1 socially distanced questions/feedback on Monday 6th July from 9 - 2.30. You can contact

your school to book a 15-minute slot. (Infant School 9 - 11.30, Junior School 11.45 - 2.15)

4. Virtual meetings will be set up on July 6th:

Staff 4pm July 6th

Parents 2.30 pm and 6 pm

To join them please contact your school and provide your email address so that you can be invited.

5. If you would like someone to phone you so you can discuss your views please let your school office know and provide some times that would suit you and your phone number.

6. School staff will create age appropriate ways of consulting with our children on their views as part of their on-line teaching.

What happens next?

The informal consultation period starts on Monday 8th June 2020 and ends on Friday July 17th, 2020 – the last page of this document can be used for you to feedback your view to governors. It should be returned to the school office. Following the consultation process, the governors will review your feedback and use it to make a response to the council, on whether to recommend proceeding with the school amalgamation proposal.

The decision to amalgamate schools must be taken by the Local Authority, but they will always take consultation responses, and school governors' recommendations into account.

In the first half of the Autumn Term the Local Authority will feedback to you on the consultation. In November the Council Cabinet (or the Mayor's Decision Panel) will decide whether to post statutory notices proposing the amalgamation.

Once these notices are posted everyone has 4 weeks where they can make representations to the Council if they wish, regarding the proposal. The notices will be posted early in December and will explain how to make representations.

The final decision to amalgamate the schools will be taken by the Local Authority at its Council Cabinet meeting on March 3rd, 2021.

How can I get more information on the proposal?

The LA will publish the feedback from the consultation on the council's website during the Autumn Term.

If permission is granted to publish a public notice, further details of this proposal will also be available in the Consultation sections of the Council's website

This document is also available on both school websites, along with papers that governors have considered before consulting with you.

<https://www.cubittowninf.co.uk>

<https://www.cubittown-jun.towerhamlets.sch.uk>

Thank you for taking the time to consider our proposal, we look forward to hearing your views.

Cubitt Town Infant Chair of Governors. Cubitt Town Junior Chair of Governors

Proposal to Amalgamate Cubitt Town Infant and Junior Schools – Response Form

Our proposal is to bring together Cubitt Town Infant and Junior Schools.

This would create Cubitt Town Primary School from 1 September 2021. We welcome your views on this proposal. Please fill in this response form and return it to the address below no later than 16th July 2020 3.30pm.

1) Do you agree with the proposal to amalgamate our two schools to become one school? Please tick as applicable

Yes		No	
-----	--	----	--

2) If you like the proposal, please say why you think it is a good idea?

3) If you dislike the proposal, please tell us why you are concerned?

4) Any other comments?

	Cubitt Town Infant School	Cubitt Town Junior School
I have child/ren attending	<input type="checkbox"/>	<input type="checkbox"/>
I am a staff member at	<input type="checkbox"/>	<input type="checkbox"/>
I am a governor at	<input type="checkbox"/>	<input type="checkbox"/>
Other (please describe)		

Your Name (Optional) _____

Please return this form to the relevant school by 17th July 2020. Feedback from question one will be summarised numerically. Comments will be typed-up and anonymised. This information will be made available to the public (via the school website), but all respondents' comments and information will be anonymised.

Appendix 4

Consultation Report on the Proposal for the Amalgamation of Cubitt Town Infant' and Junior Schools

September 1st 2020

Report compiled by Dr Helen Jenner, Independent Consultant, Tower Hamlets Primary Review.

Introduction

This report summarises the planning undertaken to lead to a public consultation, and the responses to that consultation, on whether or not Cubitt Town Infant and Junior Schools should support the Local Authority to formally consult on the amalgamation of the two schools from August 31st 2021. The report aims to support the governors to reach an informed decision during the first half of the Autumn Term to support the proposal

Background

Cubitt Town Infant and Junior Schools' Governing Bodies were both prompted, by the prospective retirement of the Infant School Headteacher, to consider how to make the schools' long term future and quality of education even stronger, ensuring a reduction in the impact of transition between the schools.

The Tower Hamlets Primary Review commissioned an Independent Consultant, Dr Helen Jenner, to work with schools facing significant change in the Borough. As well as working with the schools, Dr Jenner was asked to produce a public report "Future Ambitions"¹ setting out principles for developing school relationships for resilience and excellence. This document was shared with all Headteachers, Unions and Governors in March 2019. Regular updates on the Primary Review have been included in the termly Director's Report for Governors. It included the principle of amalgamating Infant and Junior Schools.

Governors Planning

A small Steering Group consisting of the Headteachers from both schools, supported by the Independent Consultant, and their THEP school improvement partner, has led the work on considering the implications of enhanced partnership for the two schools, including the development of draft papers for governing bodies to consider. This included the consultation papers circulated to staff, parents and other stakeholders.

Governing Body meetings were set up at both schools to discuss partnership[working, including the possibility of moving towards amalgamation in the Spring Term 2020.

¹ The Future Ambitions Report is available on the Tower Hamlets Primary Review Website.

Staff Meetings were also held in the Spring Term to ensure all staff were clear and had opportunities to ask any questions. Unions were also advised of the possibility of amalgamation in March 2020.

Governing bodies considered draft consultation documents (Appendix 1 and 2) in late May/early June and agreed that this should be circulated to staff and parents on June 5th, with the consultation to run from June 8th - July 17th 2020

Information about the consultation was also placed on the schools' websites.

<https://www.cubittown-jun.towerhamlets.sch.uk/viewer/454>
<https://www.cubittowninf.co.uk/school-letters/>

Due to coronavirus it was not possible to hold public meetings regarding the consultation, however, the following options were offered (in line with the Tower Hamlets consultation processes during coronavirus guidance for schools' consultations) :

1. A response form (or any other written format) at the end of this document to record your views. It can be posted to the schools, or emailed to the school
2. A box in the reception of each school where stakeholders could comments, response forms and any questions.
3. The Local Authority consultant, who is supporting the schools with the consultation process was available for 1 to1 socially distanced questions/feedback on Monday 6th July from 9 - 2.30.
4. Virtual meetings were set up on July 6th:
Staff 4pm July 6th
Parents 2.30 pm and 6 pm
5. One to one phone calls were offered.
6. School staff will create age appropriate ways of consulting with our children on their views as part of their on-line teaching.
7. Staff meetings regularly updated staff
8. Trade Unions were briefed on the consultation.

Consultation Response

There has been very little formal response to the consultation.

One parent requested a phone call, and 3 staff members attended a zoom meeting. Informal feedback is very positive. Staff, children and parents see the amalgamation as a natural next step for two successful schools.

Staff feedback positive reasons to support Amalgamation. The increased opportunities for staff, greater range of expertise, potential to share resources and reduction in transition anxiety were all seen as possible positive outcomes.

Staff wanted to be clear on whether they may be staffing reductions and, if that is the case, how would they be addressed. They were advised that it was too early to know what staffing structures there might be, but that the amalgamation is not being seen as a cost saving exercise, so there are no immediate staff reductions proposed, and compulsory redundancy is unlikely. If staffing changes are made the agreed School Re-organisation process would be followed (attached Appendix 3)

Professional discussion, and strong engagement from staff, parents and children with the process, puts governors in a strong position to recommend to the Local Authority that they progress to publish a statutory notice proposing the amalgamation of Cubitt Town Infant and Junior Schools from September 2021.

Trade Unions have confirmed that they have received no queries or concerns regarding the proposal.

Governors should consider this report during the first half of the Autumn Term, so that the Council Cabinet can be notified of their response before they consider the possible statutory notices in October or November 2020. A final decision on the proposal would be taken by the Council Cabinet at their meeting on March 3rd 2021.

There is general agreement that amalgamation to become an 3 -11 Primary School will support children's education and enhance the offer for local families and community.

Based on the informal feedback about the proposal, the positive opportunities it brings, and the very low level of concerns raised, I would recommend that the Local Authority move to issue statutory notices, with the support of both Governing Bodies.

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<p>Cabinet</p> <p>3 March 2021</p>	 <p>TOWER HAMLETS</p>
<p>Report of: James Thomas, Corporate Director, Children and Culture</p>	<p>Classification: Unrestricted</p>
<p>Report on the outcome of the statutory consultation on the proposal to close The Cherry Trees Special School</p>	

Lead Member	Councillor Asma Begum, Deputy Mayor for Children, Youth Services and Education
Originating Officer(s)	Terry Bryan, Service Head (Pupil Services and School Sufficiency) Ikwi Mkparu, School Organisation and Place Planning Manager
Wards affected	All wards
Key Decision?	Yes
Forward Plan Notice Published	3rd December 2021
Reason for Key Decision	To be 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.
Strategic Plan Priority / Outcome	Children and young people are protected so they get the best start in life and can realise their potential

Executive Summary

This report informs cabinet of the outcome of the four week period of public representation in response to the statutory notice on the proposal to close The Cherry Trees Special School. It recommends for the Mayor in cabinet to consider a decision on whether or not to formally proceed with plans for the School to close on the 31st August 2021. The report includes: a summary of representations received; the council's response; officer's recommendations; and the decisions available to the Mayor in Cabinet.

RECOMMENDATION:

1. Having considered the responses to statutory (public) notice at Appendix 1, the Equalities Assessment at Appendix 2 and the alternative options explored in the earlier public consultation report, it is recommended that the cabinet approves the proposal to close The Cherry Trees Special School with effect from the 31st August 2021.

1. REASONS FOR THE RECOMMENDATION

- 1.1 The recommendation is made in order to determine the Council's response to representations received following the issuing of a statutory notice proposing the closure of The Cherry Trees School.
- 1.2 The closure proposal follows a period of the School's poor performance, alongside a review of the Local Authority Special Educational Needs Strategy recommending moving to a different model of provision that better supports academic attainment and the inclusion of children with special educational needs (SEN) within mainstream provision.

2. ALTERNATIVE DECISIONS

- 2.1 The Mayor could decide not to agree to the recommendation for The Cherry Trees School to close. In which case the Council would then need to decide how the School could be improved to provide high quality and cost effective specialist education, in line with current requirements.
- 2.2 The Mayor could decide to delay the decision on the School's closure until later. However, this uncertainty would adversely impact on the provision of education for the current pupils and would therefore not be in their best interests.

3. DETAILS OF THE REPORT

- 3.1 The report informs cabinet of the responses to the statutory notice.
- 3.2 The Mayor in cabinet is asked to consider these responses alongside the Equalities Impact Assessment, before taking a decision on whether the council should proceed with The Cherry Trees School closure on the 31st August 2021.

4. INTRODUCTION

- 4.1 Following a report to cabinet on 24th November 2020, the Mayor agreed for the council to proceed with the issuing of a statutory notice on the proposal to close The Cherry Trees Special School. The main facts on the background to this decision and current position of The Cherry Trees are set out below, with the detailed information in the earlier public consultation paper (Appendix 3) and the November cabinet report.

5. BACKGROUND

- 5.1 The Cherry Trees Special School, in Campbell Road, Bow, E3, is one of six special schools in Tower Hamlets. It is a local authority maintained school providing places for up to 26 primary school age boys (currently 10 on roll) with social, emotional and mental health (SEMH) difficulties.

- 5.2 In recent years The Cherry Trees has encountered a number of challenges, culminating in an 'inadequate' Ofsted Inspection rating (Nov 2019), which deemed that its provision was no longer effective or fit for purpose. The Local Authority (LA) has since been proactively working with the School to seek to bring about its improvement. This work, alongside the development of the LA SEND Strategy and the recommendations from a recent SEMH review, has determined that the School should be replaced with alternative provisions that would be better for children and would cost less, enabling SEND resources to be used efficiently with more effective results.
- 5.3 The LA is currently planning for the first of these provisions to be in place from as early as September 2021. It will be a specialist SEMH Resource Base within Ben Jonson Primary School, working in alliance with Bowden House Secondary SEMH School. This new facility will provide more inclusive provision and also extend the range of options to meet the diverse needs of vulnerable children who are able to access a mainstream curriculum, albeit with significant modification, support and intervention. This approach is in line with the key objectives of the LA's SEND strategy.

6. REASON FOR THE RECOMMENDATION FOR THE CHERRY TREES SCHOOL TO CLOSE

- 6.1 The decline in its performance and standards has had a critical impact on pupil numbers at The Cherry Trees. This small special school is now operating with pupil numbers well below its intended capacity, with only 10 of the 26 places currently filled. This has led to significant resourcing challenges with the School relying on significant subsidy from the LA in order to balance its budget. This subsidy is not sustainable and is not an effective use of the LA's limited funding resources.
- 6.2 An analysis of the current financial position of The Cherry Trees School is provided as Appendix 4. The current forecast is for a cumulative budget deficit at 1 April 2021 of 309k. This budget deficit is projected to increase year on year and reach a total of 1.8m by 2023-24.
- 6.3 In accordance with school funding regulations, a school's budget deficit must be repaid within a three-year timeframe. Where a deficit cannot be repaid it is incumbent upon the School and the Local Authority to consider options for the School's future viability, including school closure. The funding regulations also state that a deficit balance following a school closure will be the responsibility of the local authority.
- 6.5 The reason for recommending the closure of The Cherry Trees is given in consideration of:
- the School's 'inadequate' Ofsted rating;
 - the LA's emerging SEND strategy, including its now well advanced plans to establish alternative, more inclusive and cost effective SEMH provision; and
 - the School's budget deficit that will continue to increase causing a substantial risk to The Cherry Trees being able to improve in order to provide high quality specialist education.

- 6.6 Full consideration has been given to the wellbeing of the school community, including pupils, families and staff, and the support they will require if the recommendation for closure is approved. The proposed timeframe of closure in August 2021 will mean that all except seven of The Cherry's Tree pupils will have completed their primary education. For the seven pupils who remain, alternative suitable education placements are being arranged as part of a personalised pathway. This work is being undertaken by the LA's Special Educational Needs Team in full consultation with the families and over a carefully managed timescale. The LA is acutely aware of the potential impact of the proposals on the stability of these vulnerable pupils and will therefore ensure they get the support and services they need to be able to complete their school transition successfully.
- 6.7 The majority of the staff at The Cherry Trees have remained throughout the period of this closure proposal to ensure the School's good running. A decision to close the School will require them to apply for new jobs. LA officers and the School Governing Body are working together to support staff through this change and finding new positions. Details of meetings held with the staff and their unions are included below. A formal staff consultation will only take place if a decision is made to close the school.
- 6.8 An Equalities Assessment (EA) has been undertaken and is presented in the supporting documentation (Appendix 2). Although there are some groups who are considered more vulnerable the EA explains how the risks are being mitigated.

7. CONSULTATION

- 7.1 The first stage of the public consultation process was undertaken from 14th September to 19th October 2020. An analysis of the responses to the first stage consultation was presented to the Mayor in cabinet on the 24th November 2020. Following the cabinet decision to issue the statutory notice, a second round of public consultation took place between the 4th December 2020 to 7th January 2021.
- 7.3 Due to coronavirus it was not possible to hold the traditional method of public and parents' meetings for both the first stage consultation and the subsequent statutory notice period. However, several alternative methods were used, in line with the Tower Hamlets guidance on public consultation processes during coronavirus. These methods along with the type of responses are explained in both the first stage consultation report (see Appendix 6).
- 7.4 Prior to the start of the consultation, the Local Authority's independent consultant held a series of preparatory meetings with The Cherry Trees School to discuss the background and process for the consultation. These included separate meetings with the head teacher and chair of governors, the governing body, the school's senior leadership team and school staff. The following formal meetings were then held as part of the consultation, to give consultees the opportunity to ask questions and make their views known:

Parents of Pupils at the school (including wider public)	1 to 1 meeting with Divisional Director and Head of SEN on 10 th March 2019
	1 to 1 Zoom meetings with Home School Liaison Worker on 1 st October 2020.

	Further consultation was undertaken with families as a part each individual pupil's annual review, which took place over the course of the period between April 2019 and July 2020.
School Staff	Meeting with staff and Trade Unions on 23 rd July 2020
	One to one and Zoom meetings on 1 st October 2020.
	Face to Face meetings with headteacher and school staff on 23 rd November 2020.
Local Headteachers	Meeting with Headteachers at Ben Jonson and Bowden House Schools on 2 nd December 2020.
Other Local Authorities who maintains EHCP of registered pupils at the school	Consultation sent on 4 th December 2020

7.5 Views expressed by pupils at meetings have been captured in the annual reviews of their Education Health and Care Plans (EHCPs). In addition, the school has worked with pupils to help them understand the closure proposal, seeking to reassure them that they would be fully supported throughout this period.

8. RESPONSES TO THE STATUTORY NOTICE (Second Stage Consultation)

8.1 The statutory notice period provided a further opportunity to engage with stakeholders and obtain their views. This followed on from the earlier first stage consultation, the feedback from which was reported to the 24th November 2020 cabinet meeting and is included again with this report as Appendix 5.

8.2 One representation was received in response to the statutory notice. This was from a CEO of a local academy trust who supported the proposal for The Cherry Trees School to close.

8.3 The further period of public consultation did not result in any representation that would give cause for the Local Authority to reconsider its recommendation for the closure of The Cherry Trees School.

9. TIMETABLE FOR IMPLEMENTATION OF SCHOOL CLOSURE

9.1 If the decision is made for Cherry Trees Special School to close, the timetable for implementation will be as follows:

April 2021	A staff consultation will be issued
April - July 2021	The LA's Special Educational Needs Team and SENDIAS service will continue to work with The Cherry Trees pupils and families to confirm their transfer to new provisions as part of a personalised pathway.
August 2021	The Cherry Trees School will continue to operate up until the 31st August 2020 and then formally close.

10. EQUALITIES IMPLICATIONS

10.1 An Equalities Assessment has been conducted by the LA and is attached at Appendix 2. This must be considered in detail before the Mayor in Cabinet

considers the matters above, as part of his decision on whether to close the School.

10.2 The Equality Act 2010 requires the LA, when exercising its functions, to have due regard to eliminate discrimination, harassment, victimisation; advance equality of opportunity; and to foster good relations between persons who share a relevant protected characteristic and those who do not (“the Public Sector Equality Duty”).

11. OTHER STATUTORY IMPLICATIONS

11.1 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.

(i) Managing the Impact of Proposed Closure on School Staff

11.2 The LA and School Governing Body will continue to work together to support the School staff through this change. A formal staff consultation will only take place once the final decision has been made on the schools' closure. If the final decision is for the school to close staff will be supported through further training, coaching and workshops to find redeployment opportunities at other local schools.

(ii) Best Value Implications

11.2 The Local Authority has a duty to ensure that schools are fulfilling their duties and that value for public money is achieved, whilst standards are maintained. They must ensure that they do not fall into financial deficit so that they are unable to sustain an offer of quality education for children. This proposal is being considered in view of concerns over the School's viability and therefore its ability to sustain high quality education for its children.

11.3 When a special school closes its finances are returned to the Local Authority High Needs Funding Budget, including any surplus. However, this proposed closure is not a cost-cutting exercise as all money remains ring-fenced to children with SEN and disabilities.

11.4 The proposal for closure follows a strategic review, aimed at ensuring that money is spent to provide best value for all children. Best value cannot be achieved for The Cherry Trees as its falling roll will require the Local Authority to provide financial protection to ensure that the School can remain open. It therefore forms part of a strategy to significantly reduce the annual spend on financial protection for schools with falling rolls who are otherwise not financially sustainable.

(iii) Environmental (including air quality)

11.5 There are no environmental issues arising from this proposal.

(iv) Risk Management

11.6 If this recommendation is agreed, the closure process will be carefully managed and evaluated in line with statutory guidance, mindful of the needs of the children, families and staff, and thoroughly addressing the considerations of the Equalities Assessment. The plan to close the School on the 31st August 2021 will allow enough time for arrangements to be completed by September 2021 and therefore minimise or mitigate any risks.

(v) Safeguarding

11.7 The report deals with the Council's approach to managing the supply of school places for the local population. The efficient supply of school places contributes to the safeguarding of children by ensuring their access to good quality, sustainable education provision.

(vi) Data Protection / Privacy Impact Assessment

11.8 The proposals presented in this report have followed an initial and formal public consultation using a variety of mechanisms. All responses received through these mechanisms or made directly to Council officers or members have been included in the analysis of the feedback received. These responses have only been used to assess the community's view of the proposals and not for any other purpose.

11.9 The Council handles information in accordance with the Freedom of Information Act 2000 and the Data Protection Act 2018 and is the data controller for the purposes of the Data Protection Act 2018. For more information, the privacy notice for Pupil Services can be accessed here.

12. COMMENTS OF THE CHIEF FINANCIAL OFFICER

12.1 The School is wholly funded by the High needs block of the Dedicated Schools Grant. The current size and running cost of this provision means that places are costing an exceptionally high amount and causing further pressure on an already overspent area of the Council budget. Closing the School and building provision supported by a mainstream primary School will ensure economies of scale savings in management and premises costs and better use of resources.

13. COMMENTS OF LEGAL SERVICES

13.1 Section 14 of the Education Act 1996 requires local authorities to provide sufficient schools for primary and secondary education in their area. Local authorities also have best value duties in the performance of their functions under the Local Government Act 1999.

13.2 The procedure for closing a school is set out in the Education and Inspections Act 2006, the School Organisation (Establishment and Discontinuance of Schools) Regulations 2013, and the statutory guidance 'Opening and Closing Maintained Schools' (November 2019). The proposals set out in this report comply with the above legislation and guidance.

Linked Reports, Appendices and Background Documents

Linked Report

- 24th November Cabinet Report - Outcome of the consultation on the proposal for the closure of The Cherry Trees Special School
- 3rd March Cabinet Report - Outcome of the public consultation on prescribed alterations to both Ben Jonson and Bowden House Schools and proposal to establish an SEMH Provision at Ben Jonson School.

Appendices

Appendix 1	Statutory Public Notice (2 nd stage consultation)
Appendix 2	Equalities Impact Assessment
Appendix 3	Public Consultation Paper (1 st stage consultation)
Appendix 4	Summary Analysis on the Current Financial Position of The Cherry Trees School
Appendix 5	Report on the 1 st Stage Consultation
Appendix 6	Link to the representation received in response to the statutory notice:

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

The following document(s) has been used in the preparation of this report:

- 'Opening and Closing Maintained Schools – Statutory Guidance for Proposers and Decision- Makers' (November 2019) in conjunction with Part 2 and

Schedule 2 of the Education and Inspections Act (EIA) 2006 as amended by the Education Act (EA) 2011

- The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013

Officer contact details for documents: N/A

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Consultation information:

Statutory Notice on the Proposal for the Closure of The Cherry Trees Special School

04 December 2020



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Introduction

Notice is given in accordance with section 15 of the Education and Inspections Act 2006 (as amended by the Education Act 2011) and the School Organisation (Establishment and Discontinuance of Schools) Regulations 2013 that Tower Hamlets Local Authority intends to discontinue The Cherry Trees Special School with effect from 31 August 2021.

Contact Details

Name and address of Local Authority publishing the proposal:

Tower Hamlets Council, Town Hall, Mulberry Place, 5 Clove Crescent, London, E14 2BG

Name, address and category of school proposed to be closed:

The Cherry Trees Special School, 68 Campbell Rd, London, E3 4EA.

The Cherry Trees is a registered community special school that currently makes day provision for up to 26 boys age 5 – 11 with social emotional and mental health needs.

Implementation

Date on which it is proposed to close the school:

It is proposed to close The Cherry Trees School on 31st August 2021.

It is proposed to implement the closure as follows:

By the time the School is proposed to close, all but seven of the pupils will have completed their primary education and moved onto secondary school. Discussions are being held with the parent/carers of the seven remaining pupils to plan their transfer to alternative provision at a time appropriate to their needs and taking into account parental preference. (see **Appendix 1** for the stage one consultation).

Reason for Closure

The Cherry Trees is one of six special schools in Tower Hamlets. It makes provision for primary aged pupils with Social, Emotional and Mental Health (SEMH) Needs. All pupils have an Education, Health and Care Plan (EHCP). Pupils come from across Tower Hamlets and neighbouring boroughs. It occupies a small site in the Bow area.

The Cherry Trees School has in the past been a valued asset to the borough's provision for children with special educational needs and disabilities (SEND). It has previously been rated as outstanding by OFSTED. However, in recent times the school has underperformed and was placed in special measures following its most recent OFSTED Inspection in September 2019. In the period following the inspection, through the process of the Borough's SEND review and the development of its SEND Strategy, it has become evident that the specialist provision offered by Cherry Trees is no longer effective or fit for purpose. In addition, its number of pupils on roll has reduced to the extent that this already small School is no longer financially viable.

The Local Authority's ambition is to create a better, more inclusive, and sustainable education service for the future. It must therefore ensure that it has the right provision in the right place at the right time for all the borough's children. This is particularly relevant to children with special educational needs and disabilities (SEND).

The Local Authority is therefore now in the process of developing a new specialist and more inclusive provision, through the establishment of an SEMH Resource Base within Ben Jonson Primary School, in alliance with Bowden House Secondary SEMH School. This new provision, although not a direct replacement for Cherry Trees, will extend the range of options to meet the diverse needs of vulnerable children who academically are able to access a mainstream curriculum, albeit with significant modification, support and intervention. This supports the key principles of the SEND Strategy.

The Local Authority also needs to make best use of its finances. The Cherry Trees School is now very small and is not financially viable without significant transitional protection from the Local Authority. In the last year the Local Authority has had to allocate an additional £200,000 of transitional protection to the school to enable it to balance its budget. This subsidy is not sustainable and is not an effective use of resources.

Children with highly complex needs in specialist provision need additional help from professionals in health and social care. This is best provided where staff can work better together in a more integrated way. To be able to achieve this, Tower Hamlets needs to create economies of scale and this is not possible at a school with so few pupils.

Pupil Numbers and Admissions

There are currently ten pupils on roll at the School. This number has steadily declined over recent years as follows:

School Year	Commissioned Places	Actual Pupil Numbers
2015/16	26	22
2016/17	26	24
2017/18	26	24
2018/19	26	21
2019/20	26	19
2020/21 (current)	14	10

Displaced Pupils

The proposed timeframe of closure in August 2021 will mean that all except seven pupils will have completed their primary education. For the seven pupils who may remain on the school roll in July 2021, alternative suitable placements will be arranged as part of a personalised pathway, determined in full consultation with the families and over a carefully managed timescale. The Local Authority is acutely aware of the potential impact of the proposals on the stability of these pupils. It is therefore working with their parents /carers to develop a personalised plan for each pupil, to ensure that they get the support and services they need to be able to complete their transition successfully.

Impact on the Community

The provision for children in Tower Hamlets will not diminish as a result of the proposed closure of Cherry Trees. Thus, there will be sufficient capacity within other specialist provision across the borough to accommodate pupils with SEMH. These will be distributed across the new planned specialist facility at Ben Jonson Primary School, other special schools or, in exceptional cases, one of the independent providers in the surrounding area.

The Cherry Trees School has been a part of the community over the past 20 years and it is acknowledged that it has served its community well. However, the School does not currently provide additional services or use of its facilities for the wider community and there are a number of alternative facilities available for hire at other nearby locations. There will therefore be no loss of any enrichment clubs or programmes for local families.

Rural Primary Schools

Not applicable

Balance of Denominational Provision

Not applicable

Nursery Provision

Not applicable

Sixth Form Provision

Not applicable

Travel

Few of the Cherry Trees pupils live in the immediate locality and most travel to school on school bus transport from other parts of Tower Hamlets. There will continue to be travel across the Tower Hamlets area as the Local Authority (LA) is obliged to offer a school place appropriate to a child's need, when the most local provision is deemed unsuitable. Occasionally neighbouring LAs have sought a place for particular children following parental request. However, this necessitates a long home to school journey for these children.

Finances

When a special school closes its finances is returned to the Local Authority High Needs Funding Budget, including any surplus. However, this proposed closure is not a cost-cutting exercise as all money remains ring-fenced to children with SEN and disabilities.

The proposal for closure follows a strategic review, aimed at ensuring that money is spent to provide best value for all children. Best value cannot be achieved for Cherry Trees as its falling roll will require the Local Authority to provide financial protection to ensure that the School can remain open. It therefore forms part of a strategy to significantly reduce the annual spend on financial protection for schools with falling rolls who are otherwise not financially sustainable.

Procedure for Making Representations (objections and comments)

Within four weeks from the date of publication of this proposal any person may object to or make comments on the proposal by:

Email: school.organisation@towerhamlets.gov.uk

Post: School Organisation and Place Planning Manager
Pupil Services and School Sufficiency
Tower Hamlets Children and Culture
Town Hall
Mulberry Place
5 Clove Crescent
E14 5BG

Closing date for responses is 07 January 2021.

We will not be able to consider any responses received after this date. All responses received during the representation period will be published on the Council's website in late January 2021. The website address is:

<https://www.towerhamlets.gov.uk/Home.aspx>

Appendix 1

Consultation information:

First stage consultation feedback report on the proposal for the closure of Cherry Trees Special School

20 October 2020

Report compiled by Dr Helen Jenner, Independent Consultant, Tower Hamlets Primary Review.

The Proposal

Following advice from Tower Hamlets Local Authority, the governors of Cherry Trees School, have been pre-publication consulting on a proposal to close Cherry Trees School, from September 2021.

A review, and full consultation of, the Local Authority Special Educational Needs Strategy, recommended moving to different models of provision, which would better support academic attainment, and the inclusion of children in mainstream provision, whenever possible. In the Summer Term 2020 a primary SEMH implementation plan was shared with schools and they were invited to comment and to put forward expressions of interest for proposed new provision. The strategy particularly recommends improvements in links to quality mainstream provision, access to the full primary curriculum and a strategy approach which fully includes girls with SEMH needs.

Cherry Trees School is a special school, catering for primary age boys with social, emotional and mental health needs aged 3 to 11 and is part of the educational provision of the London Borough of Tower Hamlets. The school is located at 68, Campbell Road, London E3 4EA.

In September 2019 OFSTED considered the school to be inadequate in its provision of suitable education. The school is also in financial difficulty, despite receiving an income (2018/19) of £54,000 per pupil.

Cherry Trees School is an SEMH Primary Boys School. All the pupils have EHC Plans and because of this, individual work to discuss the children's needs as part of their Annual Reviews has been underway over the last year. The families of children attending Cherry Trees School have received individual support to consider how best to improve educational provision for their children. Including support for their children's transition to better provision, through reviews of Education, Health and Care Plans. Christine McInnes, Divisional Director Education and Partnership, met with parents and staff in March 2020, to ensure they were aware of the proposals.

As well as this individualised support, Cherry Trees Governing Board, in consultation with Tower Hamlets Children's Services agreed to commence the statutory pre-consultation process for the school to close by the end of August 2021.

This report provides a summary of the stage one consultation responses. It has been compiled by Dr Helen Jenner, an independent consultant. As well as summarising responses the report also makes suggestions on next steps for the school staff, governors and Local Authority to consider, to ensure they are responding to any concerns, issues and ideas raised by respondents.

Frequently Asked Questions produced from the responses is below. Copies of written responses are available at the school and should be retained for 12 months.

Pre-Consultation activities

A formal consultation document was produced and shared with staff, parents and other stakeholders. Comments and feedback were invited, on the document, between 14th September and 19th October 2020.

The document detailed the following opportunities for staff, parents and carers to share their views.

1. A response form (or any other written format) to record their views which could be posted to the school, hand delivered or emailed to office@cherrytrees.org
2. A box was provided in the reception of Cherry Trees School where anyone could leave comments, response forms and any questions.
3. Individual meetings were held with parents. Additionally, some parents were also contacted by the Home-School liaison team, who checked whether they wanted to meet to discuss the consultation document.
4. A meeting for staff was held on September 30th with zoom access for staff who could not attend in person. There was also the opportunity for staff to feedback to Helen Jenner via zoom, on October 1st.
5. Two open zoom sessions were available for any stakeholder (parents, staff community, other schools etc.) on October 1st at 3pm and 6pm.
6. School staff created appropriate ways of consulting with children on their views as part of their ongoing teaching.

Written responses

- 11 written responses were received
- 3 responses did not indicate the background of the respondent
- 3 were from parents/foster carers
- 1 current staff member
- 2 were from ex-staff members
- 1 ex – carer
- 1 local resident

All written respondents were not in support of the proposal to close the school and to relocate children to schools that will better meet their needs.

5 respondents confirmed they had seen the SEN Strategy, and 2 further responses indicated familiarity with the document. 4 respondents stated they had not seen the SEN Strategy. Whilst there is recognition of some of the issues identified in the strategy, some people felt it was written by people who did not understand children's needs, or recognize the work of Cherry Trees School and that it may not have been sufficiently widely consulted on. Some people were concerned that no alternative SEMH provision had been established, which could potentially lead to high cost placements in independent provision. The need to meet the needs of girls and provide a continuum of provision was recognised. Some people felt that a Primary PRU would be the answer.

Respondents raised a number of individual questions which are addressed in the attached Frequently asked Questions Document.

Governors, staff and the Local Authority should consider and respond to these questions and then make the document available to all stakeholders along with this Feedback Summary.

Key Issues raised during the consultation.

The FAQ document gives a more detailed summary of the issues and concerns of respondents, this section seeks to highlight the key aspects from the responses. Several respondents expressed their appreciation for Cherry Trees staff and

recommended that they be closely involved with transition plans, including the potential of moving to new provisions alongside the children. Most respondents were keen to ensure the best possible transition for children currently attending Cherry Trees, and to secure new provision that was at least as good as the support they currently receive. It will be important for everyone to work together to ensure EHC Plans are fully able to be delivered at new provisions. Staff and parents are concerned that new provision for each child has not yet been established. The school leadership has been working with parents, local authorities, and other providers to ensure strong placements are available. The recent announcement of provision at Ben Jonson, supported by Bowden House needs to be widely communicated and discussed with the parents of all children for whom it would be appropriate. Some respondents remain concerned that there may not be sufficient SEMH Primary provision in the Borough. Parents and staff are not fully aware of the progress in expressions of interest for an integrated, higher-functioning, ASD provision in the Borough, linked to a mainstream primary school. Further communication with staff and parents about this would be helpful. A number of respondents raised concern about leadership, management and governance of the school over the last couple of years and whether an alternative route might have been possible. Circulating the SEN Strategy and SEMH implementation plan may help stakeholders to recognize that the decision is part of a strategic plan, not simply a reaction to an OFSTED report, although this would undoubtedly have exacerbated the challenges. At this stage in the Local Authority strategy and the school's history it does not seem appropriate or helpful to re-examine the past, I understand that the matters raised have been discussed previously. Staff are clearly anxious to support the children during transition but also concerned about their position, and exactly what the redundancy offer is. This should be fully explained in the FAQ response. This section is a summary of the issues raised. The range of issues have been collated using a standard coding methodology. More detailed issues are discussed in the FAQ.

Overall Recommendation

Responses show that there are still a number of concerns from all groups. None of the issues raised would present a reason not to progress to statutory notice, but further communication with all stakeholders will be important to aid understanding of strategy and ensure that parents, staff and children feel well supported. Early visits to potential new provision would greatly re-assure families. Each young person should have a clear transition plan before the Local Authority is able to take a final decision on whether, and when Cherry Trees School should close. This will be essential for ensuring the LA meets its statutory SEN duties. A formal school re-organisation staffing consultation process should be put in place, in preparation for consultation from March 10th if the decision is taken to close the school. In the meantime, staff should continue to be offered opportunities for training and secondment or redeployment, where appropriate. Management decisions to support these opportunities must continue to prioritise the needs of the boys and support for their transition. Given that alternative provision will be available within the Tower Hamlets Primary SEMH provision I can see no reason why statutory notices should not be posted.

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Equality Impact Analysis: (EIA)

Section 1: Introduction

Name of Proposal **Proposed Closure of The Cherry Trees School**

For the purpose of this document, 'proposal' refers to a policy, function, strategy or project)

Service area & Directorate responsible **Pupil Services, Children & Culture**

Name of completing officer **Elizabeth Freer**

Approved by Director/Head of Service **Terry Bryan**

Date of approval **14/01/21**

Conclusion - To be completed at the end of the Equality Impact Assessment process

This summary will provide an update on the findings of the EIA and what the outcome is. *For example, based on the findings of the EIA, the proposal was rejected as the impact on a particular group was disproportionate and the appropriate mitigations in place. Or, based on the EIA, the proposal was amended and alternative steps taken)*

Based on the findings of this EIA, there are no significant issues to prevent moving to the next stage of formal consultation, which is to proceed to the issuing of the statutory notice. This will provide further opportunity for parents, pupils, staff and wider community to give their views and raise any objections.

This proposal will require further analysis of the equalities data on staff who are at risk of redundancy, should the proposal to close the School move forward.

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity between those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them

Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.



This Equality Impact Assessment provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above, for more information about the Council's commitment to equality; please visit the Council's website.

Section 2 – General information about the proposal

Provide a description of the proposal including the relevance of proposal to the general equality duties and protected characteristic pursuant to Equality Act 2010.

The Cherry Trees School is a special school, catering for primary age boys aged 5 to 11 with Social, Emotional, and Mental Health (SEMH) needs and is part of the educational provision of the London Borough of Tower Hamlets.

In September 2019 OFSTED considered the school to be [inadequate](#) in its provision of suitable education. The school is also experiencing financial difficulties, even though it is in receipt of an income (2018/19) of £54,000 per pupil. Improvements in provision since the inspection have been made to ensure the school effectively supports its current children, but these changes are not financially sustainable in the long term.

Once a special school provision is judged to be inadequate it is no longer appropriate for EHC Plans to name the school as a suitable provision for meeting a child's needs. Therefore, there can be no further admissions to Cherry Trees School. This puts an additional pressure on the school financially. In addition, "inadequate" schools are usually re-inspected within 6 months of receiving that judgement. This was unable to take place as Ofsted, the regulatory body, had to put all inspections on hold as a result of the pandemic and lockdown caused by Covid-19.

Therefore, the option to issue a statutory notice on a proposal for the School's closure is now being recommended.

In addition to the financial difficulties, and the challenges that arise from an Inadequate inspection judgement, Tower Hamlets' Special Educational Needs and Disability (SEND) Strategy recommends moving to different models of provision. This is considered to support better academic attainment with the inclusion of children in mainstream provision, whenever possible. The SEND Strategy outlines alternative provisions which would be more conducive to high quality learning for children, and also more cost effective, thereby allowing more of the budget to be used in other ways through the High Needs Funding block.

Following the recommendations made by the SEND Strategy, Tower Hamlets are moving forward with commissioning school-based primary resource provision for pupils with Social, Emotional and Mental Health (SEMH) needs. This aims to address the level of need, and the increasing number of pupils requiring additional support, and enhance the inclusive practice already demonstrated by primary schools in LBTH. This provision is designed:

- To offer time limited placements for pupils at risk of exclusion from LBTH primary schools and to successfully reintegrate them back into the referring school;
- To reduce the level of fixed term exclusions from LBTH primary schools;
- To prepare pupils with SEMH to successfully transfer to LBTH mainstream secondary school provision;
- To improve parental confidence in the continuum of provision available within LBTH and thus increase parental choice;
- To empower parents to have greater involvement in their children's education and to develop their capacity to support their child's development and progress;
- To support pupils to become more emotionally literate, more self-aware and to be able to self-regulate;

It is an innovative model that will challenge traditional ways of working and push the boundaries with regards to intervention and support for pupils with SEMH. It will include: a personalised curriculum with a range of interventions to support pupils to develop strategies which enable their inclusion in mainstream lessons; a



parallel programme of support for families to ensure that they are able to support the strategies being implemented in school and improve their confidence in managing their child's needs; and will provide, in collaboration with a range of voluntary and statutory agencies, a range of effective support strategies for families of pupils attending the provision, including high-class, evidence based therapeutic inputs to improve the capacity of families to support their children in being successful. Any provision commissioned to provide this model will have an Ofsted rating of "Good" or "Outstanding".

This new model will lead to the development of an evidence and research-based source of expertise in relation to behaviour and emotional difficulties in terms of effective teaching approaches and management, in collaboration with the relevant LA services e.g. Behaviour Support Team, Educational Psychology Service and CAMHS.

Therefore, The Cherry Trees Governing Board, in consultation with Tower Hamlets, agreed to commence the process for the proposed closure of the school in August 2021, beginning with an informal consultation.

This is in line with the Department for Education's (DFE) guidance *Opening and Closing Maintained Schools* (2018). The Cherry Trees School has been supported with a pre-publication consultation by the local authority. Following this, the Council may proceed to a formal consultation. After formal consultation, a decision will be made by the Council with regards to closure.

The dedicated staff at Cherry Trees will be supported to find redeployment opportunities at local schools and will also have the opportunity to consider voluntary redundancy. Wherever possible, Tower Hamlets tries to avoid compulsory redundancy. If the proposal does go ahead, staff and their unions will be involved in a school re-organisation staffing process consultation. Unfortunately, because numbers have fallen, there will need to be significant reductions in staffing whether or not the proposed closure moves forward because the current structures are not affordable in the long term with so few children.

Section 3 – Evidence (Consideration of Data and Information)

What evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

As the numbers of pupils attending the school are so low, we are not able to provide demographic breakdowns so as not to allow for the possible identification of pupils.

Of the 10 children currently attending The Cherry Trees School, seven are residents of Tower Hamlets and three are from out of borough. Support for families and the children to consider transition is already in place, because there are concerns about whether Cherry Trees is the most appropriate placement for them. These families have also received individual support to consider how best to improve educational provision for their children, and to support their children's transition to better provision, through reviews of Education, Health and Care Plans.

As a result of these considerations, most pupils are in the process of moving to new provision or have requested a move. Two children will be transitioning to secondary school in September 2021 as they are currently in year 6. This will leave only four pupils to be placed prior to the proposed school closure at the end of August 2021, three who reside in the borough and one from outside of Tower Hamlets.

The School has undergone a turbulent period. The progress and attainment of pupils does not meet the Local Authority's standards or expectations, nor does it prepare pupils well for the next stage of their education. As a result, no pupils have been able to transition back into a mainstream school setting. In addition, the School site and its accommodation was not designed, or purpose built, in order to meet the needs of pupils with SEMH.



Financial benchmarking against other special schools in LBTH (Chart 1), and other primary SEMH special schools outside of LBTH (Chart 2) demonstrates the best value considerations for Cherry Trees School.

Chart 1 Cherry Trees expenditure per pupil vs other LBTH special schools

Total expenditure

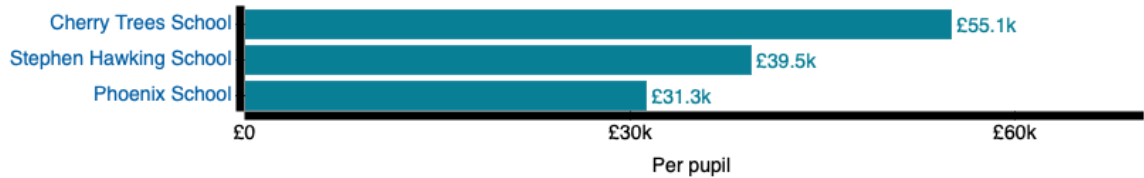
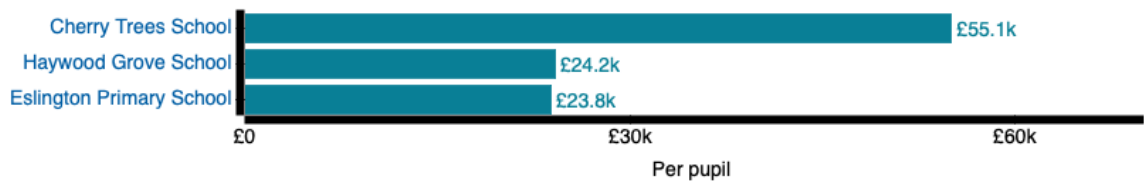


Chart 2 Cherry Trees financial benchmarking against other SEMH primary schools

Total expenditure



Consultation

A consultation document was prepared and agreed with the Local Authority. This was given in paper copy to all parents, circulated to headteachers in Tower Hamlets through the Headteacher’s Bulletin; emailed to staffing unions, and the Secretary of State was notified of potential changes.

Information about the consultation was also placed on the website <https://www.thecherrytreesschool.co.uk/Consultation-18092020123235>

Due to the limitations imposed on public gatherings by COVID-19, it was not possible to hold face to face meetings for larger groups at the school or elsewhere. In order to ensure that pupils, parents, staff and the wider community were able to engage with and respond to consultation a range of opportunities were organised as follows:

- A response form (or any other written format) at the end of the consultation document to record views to be emailed, posted, or handed to the school.
- A special email address was set up for comments
- A box was set up in the school reception, where people could leave comments, response forms and any questions.
- 1 to1 meetings with parents were held
- Virtual meetings were also set up with the independent consultant to hear about reasons for the proposal.
- Staff were given the opportunity to attend a socially distanced or virtual meeting to discuss the proposal with Helen Jenner.
- There were two governing body meetings

An update report was provided for the LA and Governors on October 20th2020 which made recommendations for further consultation activities.



Other Evidence

Financial position of The Cherry Trees School
Ofsted reports
Pupil projections
School census data
Demographic data held on current staff and pupils
Equality Act 2010
Minutes of meetings where the future of The Cherry Trees School has been discussed
Consultation Document
Consultation Feedback Report
School Policies (Equalities, SEND and Inclusion)
SEMH Review
LBTH SEND Strategy

Name of officer completing the EIA: Elizabeth Freer

Service area: C&C SPP

EIA signed off by:

Date signed off:



Section 4 – Assessing the impacts on residents and service delivery

	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Age (All age groups)			X	<p>The small number of pupils attending does not allow for data on age to be included here as it would allow for possible identification. They are all of primary school age. However, the financial position at the school is such that it is recognised that were it to remain open, the quality of education, which has already been judged to be inadequate, could continue to decline. This would thereby impact adversely on the four pupils who may still be attending at the time of the proposed closure. Instead, they will be transitioned into higher quality provision that is better suited to meet their needs and provide increased support for their parents and families.</p> <p>In regard to the closure of The Cherry Trees School meaning there will be no specialist SEMH provision for primary aged boys in LBTH, this has been mitigated through the development of the Local Authority SEND Strategy and the recommendations from the SEMH review.</p> <p>Opportunities are being created to provide more purposeful and better-quality co-educational facilities in the borough, through the soon to be established SEMH Resource Base within Ben Jonson Primary school in alliance with Bowden House Secondary SEMH school. Not only will this be able to provide places for the pupils who will be at The Cherry Trees School at the end of this academic year, it will be able to accommodate more children as it will not be limited by an inadequate judgement. This is the first of a number of long-term solutions and will be in place in the borough from early as September 2021.</p> <p>Staff</p> <p>There will also be an impact on staff at the school, who could be made redundant under the proposal. The spread of staff across the age bands is even, with those under 30 and above 60 less affected than those aged 30-59. It does not appear there will be a disproportionate impact on any one age</p>

				<p>group.</p> <table border="1" data-bbox="1200 240 1487 493"> <thead> <tr> <th>Age</th> <th>% of staff</th> </tr> </thead> <tbody> <tr> <td>20-29</td> <td>10%</td> </tr> <tr> <td>30-39</td> <td>29%</td> </tr> <tr> <td>40-49</td> <td>24%</td> </tr> <tr> <td>50-59</td> <td>29%</td> </tr> <tr> <td>60+</td> <td>10%</td> </tr> </tbody> </table> <p>Further interrogation of the data needs to be done in order to assess what job roles are currently allocated to each age range. This will help to determine whether staff in those age ranges will be disproportionately affected or not. Appropriate support and training will be provided to staff to ensure that they are able identify and access job opportunities. Support will be provided to the school’s senior leaders and governing body to ensure that they are to fulfil their role effectively supporting staff throughout the process.</p>	Age	% of staff	20-29	10%	30-39	29%	40-49	24%	50-59	29%	60+	10%
Age	% of staff															
20-29	10%															
30-39	29%															
40-49	24%															
50-59	29%															
60+	10%															
<p>Disability (Physical, learning difficulties, mental health and medical conditions)</p>			<p>X</p>	<p>The small number of pupils attending does not allow for data on age to be included here as it would allow for possible identification. All pupils attending The Cherry Trees School have a Social, Emotional or Mental Health Need. However, the financial position is such that it is recognised that were it to remain open, the quality of education, which has already been judged to be inadequate, could continue to decline. This would thereby impact adversely on the four pupils who may still be attending at the time of the proposed closure. Instead, they will be transitioned into alternative provision that will have the resource and expertise to ensure that their needs can be met and provide increased support for their parents and families.</p> <p>In regard to the closure of The Cherry Trees School meaning there will be no specialist SEMH provision for primary aged boys in LBTH, this has been mitigated through the development of the Local Authority SEND Strategy and</p>												

				<p>the recommendations from the SEMH review.</p> <p>Opportunities are being created to provide more purposeful and better-quality co-educational facilities in the borough, through the soon to be established SEMH Resource Base within Ben Jonson Primary school in alliance with Bowden House Secondary SEMH school. This is the first of a number of long-term solutions and will be in place in the borough from early as September 2021.</p> <p>Staff</p> <p>Fewer than 5 members of staff indicated they have a disability. Whilst this does not represent a disproportionate impact, LBTH should ensure that any staff members who may need additional support, or are more vulnerable when looking for new jobs, are able to access appropriate help and advice and are not disadvantaged by the process.</p>
Sex			X	<p>Only males will be affected as The Cherry Trees School is a boys school. These boys will have an opportunity to continue their education in alternative settings, including the new coeducational provision being established at Ben Jonson Primary School and supported by Bowden House residential SEMH boys secondary school. This provide more purposeful and better-quality facilities in the borough that will not only benefit boys, but also girls, for whom there is currently no SEMH primary provision. Therefore, moving to a model of co-educational facilities will increase equality of opportunity for both sexes.</p> <p>Staff</p> <p>The staff gender breakdown is weighted heavily towards women at The Cherry Trees School, with 71% identifying as female. This is the case across most primary school provision in the borough and elsewhere. As teaching roles are not gender specific, this should not have a disproportionate impact on future employment for female staff.</p>



Gender reassignment			X	No impact - we do not collect data on this protected characteristic												
Marriage and civil partnership			X	No impact - we do not collect data on this protected characteristic												
Religion or philosophical belief			X	No impact - we do not collect data on this protected characteristic												
Race			X	<p>The small number of pupils attending does not allow for data on race to be included here as it would allow for possible identification. However, the financial position is such that it is recognised that were it to remain open, the quality of education, which has already been judged to be inadequate, could continue to decline. This would thereby impact adversely on the four pupils who may still be attending at the time of the proposed closure, irrespective of their ethnicity. Instead, they will be transitioned into higher quality provision that is better suited to meet their needs and provide increased support for their parents and families.</p> <p>Staff</p> <p>There will be more of an impact on White British staff, as more staff of this ethnicity are employed at the school. However, as roles in education are not race-specific, should not be a disproportionate impact on staff ethnicity.</p> <table border="1"> <thead> <tr> <th>Ethnicity</th> <th>% of staff</th> </tr> </thead> <tbody> <tr> <td>Asian - Bangladeshi</td> <td>19%</td> </tr> <tr> <td>Black - Caribbean</td> <td>10%</td> </tr> <tr> <td>Black - Other</td> <td>10%</td> </tr> <tr> <td>White - Other</td> <td>19%</td> </tr> <tr> <td>White - British</td> <td>43%</td> </tr> </tbody> </table>	Ethnicity	% of staff	Asian - Bangladeshi	19%	Black - Caribbean	10%	Black - Other	10%	White - Other	19%	White - British	43%
Ethnicity	% of staff															
Asian - Bangladeshi	19%															
Black - Caribbean	10%															
Black - Other	10%															
White - Other	19%															
White - British	43%															
Sexual orientation			X	No impact - we do not collect data on this protected characteristic												



Pregnancy and maternity			X	No impact - we do not collect data on this protected characteristic
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Other

Socio-economic			X	Although we do not collect data on the socio-economic background of pupils, there has always been a high proportion of pupils in receipt of Free School Meals at the school. This reflects the reality of LBTH having one of the highest child poverty rates in London and is comparable to other primary schools in the borough. As places at other provision are not means-tested, we do not anticipate this being a barrier to the proposal.
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Parents/Carers		X		<p>Written responses received from the stage one consultation were identified as being from parents (3), none of them supported the decision to close the school. Parents were concerned whether a new provision would be good enough and whether the transition would be robust.</p> <p>As the majority of parents at the school have chosen to move, or are discussing transitioning their child to other provision, this feedback suggests these concerns are limited to a few. Further reassurance needs to be provided to all parents as to future plans and the benefits to their children. The SEND Strategy looks to securing better outcomes through closer links to mainstream education, thereby supporting children to transition back into mainstream education, if suitable. This has not been a successful outcome for children at The Cherry Trees School in recent years.</p> <p>As previously stated, the new model of resource based provision not only aims to improve parental confidence in the continuum of provision available within LBTH and thus increase parental choice, it would empower parents to have greater involvement in their children's education and to develop their capacity to support their child's development and progress. There will be a parallel programme of support for families to ensure that they can contribute to the strategy being implemented in the school and improve</p>
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				their confidence in managing their child's needs. It should also provide, in collaboration with a range of voluntary and statutory agencies, a range of effective support strategies for families of pupils attending the provision, including therapeutic services.
People with different Gender Identities e.g. Gender fluid, Non-Binary etc			X	No impact - we do not collect data on this protected characteristic
AOB				

Section 5 – Impact Analysis and Action Plan

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Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
<ul style="list-style-type: none"> Further analysis of workforce data needs to occur Provide continued support for parents/carers 	<ul style="list-style-type: none"> Explore whether new roles will be created in resource bases for staff to apply for Parent and Family Support Service to offer targeted support SENCOs and parents to continue discussing the benefits of transitioning Provide updated information to 	<p>By end of statutory consultation period, if the proposal progresses to that stage</p> <p>By end of statutory consultation period, if the proposal progresses to that stage</p>	<p>Human Resources</p> <p>Head of Parent and Family support</p> <p>Head of SEN</p>	



	parents about the new resource base provision at Ben Jonson			
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Section 6 – Monitoring

Have monitoring processes been put in place to check the delivery of the above action plan and impact on equality groups?





Yes?

No?

Describe how this will be undertaken:

Appendix A

Equality Impact Assessment Decision Rating

Decision	Action	Risk
<p>As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act. It is recommended that this proposal be suspended until further work is undertaken.</p>	<p>Suspend – Further Work Required</p>	<p>Red</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.</p>	<p>Further (specialist) advice should be taken</p>	<p>Red Amber</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p>	<p>Proceed pending agreement of mitigating action</p>	<p>Amber</p> 
<p>As a result of performing the EIA, the proposal does not appear to have any disproportionate impact on people who share a protected characteristic and no further actions are recommended at this stage.</p>	<p>Proceed with implementation</p>	<p>Green:</p> 

Public Consultation (1st Stage) on the proposal to close Cherry Trees School (14th September 2020)

The Proposal

Following advice from Tower Hamlets Local Authority, the governors of Cherry Trees School, wish to consult on a proposal to close Cherry Trees School, from September 2021.

Why are we proposing this change?

A review of the Local Authority Special Educational Needs Strategy recommends moving to a different model of provision, which better supports academic attainment, and the inclusion of children in mainstream provision, whenever possible.

Cherry Trees School is a special school, catering for primary age boys with social, emotional and mental health needs aged 3 to 11 and is part of the educational provision of the e London Borough of Tower Hamlets. The school is located at 68, Campbell Road, London E3 4EA. Cherry Trees

In September 2019 OFSTED considered the school to be inadequate in its provision of suitable education. The school is also in financial difficulty, despite receiving an income (2018/19) of £54,000 per pupil.

The families of children attending Cherry Trees School have received individual support to consider how best to improve educational provision for their children, and to support their children's transition to better provision, through reviews of Education, Health and Care Plans.

Cherry Trees Governing Board, in consultation with Tower Hamlets Children's Services, have agreed to commence the statutory process for proposed closure of the school in August 2021.

In line with the Department for Education's (DFE) guidance *Opening and Closing Maintained Schools* (2018), the council will support us with a pre-publication consultation. The Council may proceed to a formal consultation. After formal consultation, a decision will be made by the Council with regards to closure.

What would happen to our Headteachers?

The Interim Headteachers were employed on fixed term contracts and were not expecting to remain at the school long term.

Why close Cherry Trees?

Unfortunately, the provision at Cherry Trees is no longer effective or fit for purpose. It is extremely expensive and even with high staff levels (which are not affordable now, or in the future) it is falling to deliver quality education. The Tower Hamlets SEN Strategy outlines alternative provisions which would be better for children, and would cost less, allowing more funds to be used in other ways through the High Needs Funding block.

What will it mean for the children?

Support for families and the children to consider transition is already in place, because we are concerned about whether Cherry Trees is an adequate placement for them. At most, there will be 11 children in the school this year. The solutions to what would be a better provision are being considered individually for each child, linked to their Education, Health and Care Plans, and include transition planning.

How will transition for the children be managed?

Children will continue to be able to go to Cherry Trees School until better provision is found for them, up to the end of the Summer Term 2021. During the year individual transition plans will determine when each child moves to their new provision.

What will it mean for the staff?

Staff at Cherry Trees will be supported to find redeployment opportunities at other local schools, they will also have the opportunity to consider voluntary redundancy. Wherever possible Tower Hamlets tries to avoid compulsory redundancy. If the proposal does go ahead staff, and their unions, will be involved in a School Re-organisation staffing process consultation. Unfortunately, because numbers have fallen, there will need to be significant reductions in staffing, whether or not the school closes, because the current structures are not affordable with so few children.

What will happen to the school building?

At this stage of the proposal there are no specific plans for the building. These will be considered if the proposal progresses to statutory notice later this year.

Procedure to achieve the closure

There will be no further admissions to Cherry Trees School. Once a special school provision is judged to be inadequate it is no longer appropriate for EHC Plans to name the school as a suitable provision for meeting a child's needs.

What is the point of consultation?

We are consulting with you to make sure we put in place the right things to make a transition as smooth as possible. We also need to make sure that people understand how these fits with the Tower Hamlets SEN Strategy, and why the Council and governors are considering this very difficult decision.

All responses to this consultation will be put together in a report to governors and the Local Authority. The Local Authority will then decide, at its November 2020 meeting,

whether to move to statutory notice - a formal publication of a document explaining the closure and its impact. Stakeholders are then able to make representations to the Local Authority before a final decision is reached early in March 2021.

If the proposal goes ahead and the Local Authority Cabinet does decide to close the school all the children at Cherry Trees will transition to new schools by September 2021, when Cherry Trees will formally close.

We want to consult you to gather your views because you are part of the school community. The governing body of the school and the London Borough of Tower Hamlets cannot simply decide to make changes to schools without first seeking the views of parents, staff and others. There is a legal process which must be followed before changes can be made, and it is important that the Governing Body and the Council hear your views before deciding whether to proceed.

How do we feed in our ideas and views?

We have organised the following opportunities for staff, parents and carers to share their views.

1. You can use the response form (or any other written format) at the end of this document to record your views. It can be posted to the schools, or emailed to

office@cherrytrees.org

2. There is a box in the reception of Cherry Trees School where you can leave your comments, response forms and any questions.

3. Individual meetings have been held with parents. You will also be contacted by Caz who will check whether you would like to meet with her to discuss the consultation document.

4. A meeting for staff will be held on September 30th at 3.30, there will be zoom access if staff cannot attend. There will also be the opportunity to feed back to Helen Jenner via zoom, on October 1st at 4pm

5. Two open zoom sessions will be available for any stakeholder (parents, staff community, other schools etc.) on October 1st at 3pm and 6pm.

6. School staff will create appropriate ways of consulting with our children on their views as part of their ongoing teaching.

What happens next?

The consultation period starts on 14th September and ends on 21st October 2020 – the last page of this document can be used for you to feedback your view to governors and the Local Authority. It should be returned to the school office. Following the consultation process, the Governors' Steering Group will review your feedback and use it to make a response to the council, on whether or not to recommend proceeding with the school closure proposal.

The Governing Body and) will consider your feedback in their representations following the publication of the formal statutory notice, if the Council decide to move to this stage, at their Cabinet meeting in November 2020.

If the Council decides to proceed, a public notice (the statutory notice) will specify details of the final proposal and there will be a period of at least four weeks when representations can be made. This will be the final opportunity to make any comments on the proposal. It is then anticipated that a final decision on whether to close the schools will be made by the council on March 3rd, 2020.

How can I get more information on the proposal?

The LA will publish the feedback from this pre-publication consultation on the council's website during the Autumn Term.

If permission is granted to publish a public notice, further details of this proposal will also be available in the Consultation sections of the Council's website

This document is also available on the school website

Thank you for taking the time to consider our proposal, we look forward to hearing your views.

Cherry Trees Chair of Governors

Proposal to close Cherry Trees School – Response Form

Our proposal is to close Cherry Trees School, from August 31st 2021 and to support all Cherry Trees children to relocate to other schools.

We welcome your views on this proposal. Please fill in this response form and return it to the address below no later than 21st October 3.30pm.

- 1) Do you accept the need for the proposal to close Cherry Trees School, and relocate children to schools that will better meet their needs?

Please tick as applicable

Yes		No	
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- 2) Have you heard of the Tower Hamlets SEND Strategy? Do you think it will help better meet children's needs?

- 3) Do you have any ideas/worries about how we can best help children, staff and families to move to possible new arrangements?

- 4) Any other comments? Please feel free to use the other side of this paper for your comments.

- 5) Please indicate which of these best describes your link to Cherry Trees School

Parent		Staff Member		Governor		Other – please specify
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(Children's views will be ascertained through age appropriate methods)

Your Name (Optional) _____

Please return this form to Cherry Trees School by 21st October 2020. Feedback from question one will be summarised numerically. Comments will be typed-up and anonymised. This information will be made available to the public (via the school website), but all respondents' comments and information will be anonymised.

If you would like the opportunity to have a telephone conversation about your concerns, please add your phone number and dates and times that would suit you to this form. You will then be contacted by someone from the Local Authority consultation support teams.

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Appendix 5

Cherry Trees School Public Consultation (1st Stage) Feedback Report - 20th October 2020

The Proposal

Following advice from Tower Hamlets Local Authority, the governors of Cherry Trees School, have been pre-publication consulting on a proposal to close Cherry Trees School, from September 2021.

A review, and full consultation of, the Local Authority Special Educational Needs Strategy, recommended moving to different models of provision, which would better support academic attainment, and the inclusion of children in mainstream provision, whenever possible. In the Summer Term 2020 a primary SEMH implementation plan was shared with schools and they were invited to comment and to put forward expressions of interest for proposed new provision. The strategy particularly recommends improvements in links to quality mainstream provision, access to the full primary curriculum and a strategy approach which fully includes girls with SEMH needs.

Cherry Trees School is a special school, catering for primary age boys with social, emotional and mental health needs aged 3 to 11 and is part of the educational provision of the London Borough of Tower Hamlets. The school is located at 68, Campbell Road, London E3 4EA.

In September 2019 OFSTED considered the school to be inadequate in its provision of suitable education. The school is also in financial difficulty, despite receiving an income (2018/19) of £54,000 per pupil.

Cherry Trees School is an SEMH Primary Boys School. All the pupils have EHC Plans and because of this, individual work to discuss the children's needs as part of their Annual Reviews has been underway over the last year. The families of children attending Cherry Trees School have received individual support to consider how best to improve educational provision for their children. Including support for their children's transition to better provision, through reviews of Education, Health and Care Plans. Christine McInnes, Divisional Director Education and Partnership, met with parents and staff in March 2020, to ensure they were aware of the proposals.

As well as this individualised support, Cherry Trees Governing Board, in consultation with Tower Hamlets Children's Services agreed to commence the statutory pre-consultation process for the school to close by the end of August 2021.

This report provides a summary of the stage one consultation responses. It has been compiled by Dr Helen Jenner, an independent consultant. As well as summarising responses the report also makes suggestions on next steps for the school staff, governors and Local Authority to consider, to ensure they are responding to any concerns, issues and ideas raised by respondents.

Frequently Asked Questions produced from the responses is below. Copies of written responses are available at the school, and should be retained for 12 months.

Pre-Consultation activities

A formal consultation document was produced and shared with staff, parents and other stakeholders. Comments and feedback were invited, on the document, between 14th September and 19th October 2020.

The document detailed the following opportunities for staff, parents and carers to share their views.

1. A response form (or any other written format) to record their views which could be posted to the school, hand delivered or emailed to

office@cherrytrees.org

2. A box was provided in the reception of Cherry Trees School where anyone could leave comments, response forms and any questions.

3. Individual meetings were held with parents. Additionally, some parents were also contacted by the Home-School liaison team, who checked whether they wanted to meet to discuss the consultation document.

4. A meeting for staff was held on September 30th with zoom access for staff who could not attend in person. There was also the opportunity for staff to feedback to Helen Jenner via zoom, on October 1st.

5. Two open zoom sessions were available for any stakeholder (parents, staff community, other schools etc.) on October 1st at 3pm and 6pm.

6. School staff created appropriate ways of consulting with children on their views as part of their ongoing teaching.

Written responses

11 written responses were received

3 responses did not indicate the background of the respondent

3 were from parents/foster carers

1 current staff member

2 were from ex-staff members

1 ex – carer

1 local resident

All written respondents were not in support of the proposal to close the school and to relocate children to schools that will better meet their needs.

5 respondents confirmed they had seen the SEN Strategy, and 2 further responses indicated

familiarity with the document. 4 respondents stated they had not seen the SEN Strategy. Whilst there is recognition of some of the issues identified in the strategy, some people felt it was written by people who did not understand children's needs, or recognize the work of Cherry Trees School and that it may not have been sufficiently widely consulted on. Some people were concerned that no alternative SEMH provision had been established, which could potentially lead to high cost placements in independent provision. The need to meet the needs of girls and provide a continuum of provision was recognised. Some people felt that a Primary PRU would be the answer.

Respondents raised a number of individual questions which are addressed in the attached Frequently asked Questions Document.

Governors, staff and the Local Authority should consider and respond to these questions and then make the document available to all stakeholders along with this Feedback Summary.

Key Issues raised during the consultation.

The FAQ document gives a more detailed summary of the issues and concerns of respondents, this section seeks to high light the key aspects from the responses.

Several respondents expressed their appreciation for Cherry Trees staff and recommended that they be closely involved with transition plans, including the potential of moving to new provisions alongside the children.

Most respondents were keen to ensure the best possible transition for children currently attending Cherry Trees, and to secure new provision that was at least as good as the support they currently receive. It will be important for everyone to work together to ensure EHC Plans are fully able to be delivered at new provisions.

Staff and parents are concerned that new provision for each child has not yet been established. The school leadership has been working with parents, local authorities, and other providers to ensure strong placements are available. The recent announcement of provision at Ben Jonson, supported by Bowden House needs to be widely communicated and discussed with the parents of all children for whom it would be appropriate. Some respondents remain concerned that there may not be sufficient SEMH Primary provision in the Borough.

Parents and staff are not fully aware of the progress in expressions of interest for an integrated, higher-functioning, ASD provision in the Borough, linked to a mainstream primary school. Further communication with staff and parents about this would be helpful.

A number of respondents raised concern about leadership, management and governance of the school over the last couple of years and whether an alternative route might have been possible. Circulating the SEN Strategy and SEMH implementation plan may help stakeholders to recognize that the decision is part of a strategic plan, not simply a reaction to an OFSTED report, although this would undoubtedly have exacerbated the challenges. At this stage in the Local Authority strategy and the school's history it does not seem appropriate or helpful to re-examine the past, I understand that the matters raised have been discussed previously.

Staff are clearly anxious to support the children during transition but also concerned about their position, and exactly what the redundancy offer is. This should be fully explained in the FAQ response.

This section is a summary of the issues raised. The range of issues have been collated using a standard coding methodology. More detailed issues are discussed in the FAQ.

Overall Recommendation

Responses show that there are still a number of concerns from all groups. None of the issues raised would present a reason not to progress to statutory notice, but further communication with all stakeholders will be important to aid understanding of strategy and ensure that parents, staff and children feel well supported.

Early visits to potential new provision would greatly re-assure families.

Each young person should have a clear transition plan before the Local Authority is able to take a final decision on whether, and when Cherry Trees School should close. This will be essential for ensuring the LA meets its statutory SEN duties.

A formal school re-organisation staffing consultation process should be put in place, in preparation for consultation from March 10th if the decision is taken to close the school. In the meantime, staff should continue to be offered opportunities for training and secondment or redeployment, where appropriate. Management decisions to support these opportunities must continue to prioritise the needs of the boys and support for their transition.

Given that alternative provision will be available within the Tower Hamlets Primary SEMH provision I can see no reason why statutory notices should not be posted.

Appendix 4

The Cherry Trees School - Financial Position as of January 2021

Introduction.

1. Special School funding is through the high needs block. The funding is based on a fixed place allocation per pupil and then a “top -up” from the high needs block reflective of the actual costs of the pupil.

School Budget Share.

2. The School Budget Share is the primary source of funding for Cherry Trees, covering all pupils in reception to Year 6. It is predominantly pupil led; in 2020-21 the budget share was £783,423 of which £775,145 (99%) was pupil led. Changes in place and pupil numbers therefore have a significant impact on the funding available.
3. Recent changes in the budget share are set out in the following table.

Financial Year	Budget Share (Exc Capital)	Pupil Led	Pupil Numbers Years R-6 ⁽¹⁾
2020-21	783,149	775,145	19
2019-20	954,335	953,193	19
2018-19	1,036,691	1,035,422	21

(1) October census preceding the financial year.

4. The projected roll of 16 for September 2021 indicates a school budget share of £632,094 for 2021-22. This would fall significantly in future years as larger year groups leave the school and if the fall in applications is not reversed.
5. In addition to the budget share the school receives various grants and other contributions; the majority of these funding sources are determined by pupil numbers and will fall as the roll decreases. Total income for preceding years is shown in the next table.

Financial Position – Prior Years.

6. The difference between the school’s income and expenditure is set out in the following table.

	Income ⁽¹⁾	Expenditure	Net ⁽²⁾	Cumulative ⁽²⁾
2020-21	788,064	1,100,740	(312,676)	(309,924)
2019-20	964,784	1,056,074	(91,290)	2,751
2018-19	1,046,812	1,051,714	(4,902)	94,041

(1) Includes £200K LA cash advance to September 2020

(2) Figures in brackets represent a deficit.

- The in-year deficit in 2019/20 was £91,290, and subsequently is forecast to be £312,676 in 2020/21. Regulations prevent a Local Authority (LA) from writing off school deficits so in-year balances are added to those brought forward from previous years giving a cumulative forecast deficit budget balance at 1 April 2021 of £309,924.

Financial Position - Future Years.

- The Scheme for Financing Schools requires the governing body reduce the in-year expenditure so as not to exceed in-year income; in addition, further reductions are required so as to eliminate the cumulative deficit over no more than three years. This would indicate a year on year reduction in expenditure in the region of £103K (on a straight line recovery of the cumulative deficit).
- The school has produced a financial projection covering the financial years to 2023-24. The cumulative projected deficits increase year on year to reach a collective deficit of £1,881,071 by 2023-24.

Cherry Trees - BP	20/21	21/22	22/23	23/24
Opening Balance	2,751	-309,924	-822,057	-1,345,726
In year Deficit	-312,676	-512,133	-523,669	-535,344
Cumulative YE Bal	-309,924	-822,057	-1,345,726	-1,881,071


Previous LA Financial Support.

- To enable the school to function, the LA has made cash advances totalling £200K to the end of Sept 2020.
- The Tower Hamlets Scheme for Financing Schools in force at the time of the advances allowed the LA to make loans to schools with Licensed Deficits¹. To date loan repayments have not been scheduled.
- A directed revision to schemes by the Secretary of State on 22 March 2018 removed the ability to make loans to schools with Licensed Deficits. The revision does not prevent cash advances being made to prevent overdrafts but does limit the period of a Licensed Deficit to three years.

Licensed Deficit Agreement.

- A new Licensed Deficit Agreement is required with the governing body within the limits imposed by the Secretary of State and taking account of the likely future of the school. Careful monitoring of the action plan will be needed in order to safeguard the LA's financial position. If a decision is taken to close the school the action plan and monitoring arrangements will be an important element in controlling the final deficit to be met by Tower Hamlets' General Fund.

¹ A Licensed Deficit is an agreement between the LA and a governing body that allows a school to set a deficit budget. It should only be allowed when the governing body can demonstrate, through an action plan, that it can bring in-year income and expenditure into balance **and** eliminate the cumulative deficit brought forward. National regulations now limit a permitted deficit to a maximum of three years.

<p>Cabinet</p> <p>3 March 2021</p>	 <p>TOWER HAMLETS</p>
<p>Report of: James Thomas, Corporate Director, Children and Culture</p>	<p>Classification: Unrestricted</p>
<p>Report on the outcome of the statutory consultation on the proposal to close Shapla Primary School</p>	

Lead Member	Councillor Asma Begum, Deputy Mayor for Children, Youth Services and Education
Originating Officer(s)	Terry Bryan, Service Head (Pupil Services and School Sufficiency) Ikwi Mkparu, School Organisation and Place Planning Manager
Wards affected	All wards
Key Decision?	Yes
Forward Plan Notice Published	3 rd December 2021
Reason for Key Decision	To be 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.
Strategic Plan Priority / Outcome	Children and young people are protected so they get the best start in life and can realise their potential

Executive Summary

This report informs cabinet of the outcome of the four week period of public representation in response to the statutory notice on the proposal to close Shapla Community Primary School. It recommends for the Mayor in cabinet to consider a decision on whether or not to formally proceed with plans for the School to close on the 31st August 2021. The report includes: a summary of representations received; the council's response; officer's recommendations; and the decisions available to the Mayor in Cabinet.

RECOMMENDATION:

1. Having considered the responses to statutory (public) notice at Appendix 1, the Equalities Assessment at Appendix 2 and the alternative options explored in the earlier public consultation report, it is recommended that the cabinet approves the proposal to close Shapla Primary School with effect from the 31st August 2021.

1. REASONS FOR THE RECOMMENDATION

- 1.1 The recommendation is made in order to determine the council's response to representations received following the statutory notice.
- 1.2 Prior to the earlier stage one consultation, which was followed by the issuing of the statutory notice, alternatives were explored to support a sustainable future for Shapla Primary School. These were considered in detail by the School's Governing Body. However, upon further analysis none of these alternatives were considered viable. These alternatives together with explanations of why they could not be pursued are considered in this report and its appendices.

2. ALTERNATIVE DECISIONS

- 2.1 The Mayor could decide not to agree to the recommendation for Shapla Primary School to close. In which case the council would then have to decide on how the School's increasing budget deficit would be funded beyond the 2020/21 school year, given that it is no longer financially viable and will not see a sufficient increase in its pupil numbers for the situation to change in the foreseeable future.
- 2.2 The Mayor could decide to delay the decision on the School's closure until later years. However, this would mean that the School's financial position would worsen, further impacting on the quality of education for its current pupils and leaving an even bigger budget deficit. It would then not be possible for Shapla Primary School to provide pupils with a rounded education that meets their academic, social and emotional needs. Consequently, any delay would not be in the best interests of educational provision in the area.

3. DETAILS OF THE REPORT

- 3.1 The report informs cabinet of the responses to the statutory notice.
- 3.2 The Mayor in cabinet is asked to consider these responses alongside the Equalities Impact Assessment, before taking a decision on whether the council should proceed with the Shapla Primary School closure on the 31st August 2021.

4. INTRODUCTION

- 4.1 Following a report to cabinet on 21st October 2020, the Mayor agreed for the council to proceed with the issuing of a statutory notice on the proposal to close Shapla Primary School. The main facts on the background to this decision, and current position of Shapla School, are set out below, with the detailed information

in the earlier public consultation paper (Appendix 3) and the October cabinet report.

5. BACKGROUND

- 5.1 Shapla Primary School is a one form entry school for up to 210 pupils with additional nursery provision. It is located at Wellclose Square, E1 8HY, in the Wapping catchment area to the west of the borough. The school's is able to take up to 30 pupils at the point of entry in reception. For the last few years, Shapla has experienced low numbers of reception applications and the total roll of the school has consequently reduced over time.
- 5.2 Schools receive funding per pupil and lower pupil numbers can create financial difficulties and present significant challenges with school organisation and the delivery of a high quality curriculum.
- 5.3 The table below presents the numbers of reception offers for Shapla over the past five years. It shows that the number of offers has remained low and well below the School's Planned Admission Number. This has resulted in high percentages of unfilled places and a significant decline in the Shapla pupil roll.

Year	Reception Offers	Planned Admission Number	% of Unfilled Places
2016	18	30	40
2017	16	30	47
2018	12	30	60
2019	8	30	73
2020	12	30	60

- 5.4 The decline in the pupil roll at Shapla is largely due to the significant population changes in Tower Hamlets, where pupil numbers are currently falling in areas west of the borough. This now means that Shapla School, along with some other schools, does not have sufficient children to fill its classes. All year groups are now operating at well below their capacity.
- 5.5 The advice from central government is for Local Authorities to aim to have no more than 10% of surplus places across the whole area and for purposeful action to be taken in individual schools with more than 25% of unfilled places.

6. REASON FOR THE RECOMMENDATION FOR SHAPLA SCHOOL TO CLOSE

- 6.1 This recommendation is being made, given the significant fall in pupil numbers and the associated impact on the educational and financial viability of the School. These underlying viability issues are caused by a considerable and unrecoverable cumulative budget deficit, very low pupil numbers and reception year admission patterns that have declined over a period of time.
- 6.2 An analysis of the current financial position of Shapla School is provided at Appendix 4. The School's in-year deficit in 2019/20 was 149k. Regulations prevent a Local Authority (LA) from writing off school deficits so in-year balances are added to those brought forward from previous years giving Shapla a cumulative

budget deficit at 1 April 2020 of 423k. This deficit is projected to increase year on year to reach a total of 852k by 2023-24.

- 6.3 In accordance with school funding regulations, a school's budget deficit must be repaid within a three-year timeframe. Where a deficit cannot be repaid it is incumbent upon the School and the Local Authority to consider options for the School's future viability, including closure. The funding regulations also state that a deficit balance following a school closure will be the responsibility of the local authority.
- 6.4 The current pupil projections for the west of the borough are attached as Appendix 5. In terms of demographic growth, pupil projections show that there is no material increase in the projected numbers of primary pupils within the areas west of the borough. Based on the data for the Wapping area, the numbers of pupils starting primary schools in Wapping is very unlikely to increase significantly in the foreseeable future. This indicates that there is no real prospect of recovery for the Shapla School pupil roll over the next few years.
- 6.5 The reasoning for the closure of Shapla Primary School is therefore evidenced by:
- its falling pupil roll;
 - its increasing budget deficit and the substantial risk to the continued provision of high quality education;
 - pupil projections that indicate there is unlikely to be an increase in demand for places at the School in the medium to long term; and
 - the unfilled places elsewhere in the local area, which can accommodate the displaced Shapla pupils.
- 6.6 Throughout this process full consideration has been given to the wellbeing of the Shapla School community, and the support pupils, families and staff will require if the recommendation for closure is approved. The need to ensure sustainable high quality education remains the Local Authority's primary consideration and provisional arrangements are already in place for pupils and their families. The impacts and risks are considered in this report and in the equalities assessment. Families have started to look for new school places during the consultation period and some have already decided to take up offers at other Tower Hamlets schools. The vast majority of Shapla pupils will be able to transfer to nearby schools.
- 6.7 The staff at Shapla have remained throughout the period of this closure proposal to ensure the School's good running. A decision to close Shapla will require them to apply for new jobs. LA officers and the School Governing Body are working together to support staff through this change and finding new positions. Details of meetings held with the staff and their unions are included below. A formal staff consultation will only take place if a decision is made to close the School.
- 6.8 An Equalities Assessment (EA) has been undertaken and is presented in the supporting documentation (Appendix 2). Although there are some groups who are considered more vulnerable the EA explains how the risks are being mitigated.

7. CONSULTATION

- 7.1 The first stage of the public consultation process was undertaken from 8th June to 17th July 2020. An analysis of the responses to the first stage consultation was presented to the Mayor in cabinet on the 21st October 2020. Following the cabinet decision to issue the statutory notice, a second round of public consultation took place between the 16th November and 16th December 2020.
- 7.2 Due to coronavirus it was not possible to hold the traditional method of public and parents' meetings for both the first stage consultation and the subsequent statutory notice period. However, several alternative methods were used, in accordance with the Tower Hamlets guidance on public consultation processes during coronavirus. These methods along with the type of responses are explained in both the first stage consultation report (see Appendix 6) and the analysis of the responses to the statutory notice (see Appendix 7).
- 7.3 Prior to the start of the consultation, the Local Authority's independent consultant held a series of preparatory meetings with Shapla School to discuss the background and process for the consultation. These included separate meetings with the head teacher and chair of governors, the governing body, the school's senior leadership team and school staff. The following formal meetings were then held as part of the consultation, to give consultees the opportunity to ask questions and make their views known:

Parents (including wider public)	Video Presentations available online from 4 th June 2020
	Virtual Meetings 9.30 and 6pm 13 th July and 10 th November 2020
	Individual meeting in school with parent liaison/learning mentor 17 th September and 20 th October 2020.
	Playground meetings on 30 th September, 6 th October and 10 th November 2020.
	Online update meeting for all parents 25 th November 2020
	Online transition meetings for parents with children starting new schools in January 2021 - 2 nd , 9 th and 16 th December 2020.
	Visit to alternative school(s) to look around school and plan parents small group visits in January 2021.
	Meetings with parents of children with EHCPs from the 18 th January 2021 onwards
School Staff	121 meetings offered 13 th July 2020
	Zoom meetings 13 th July, 10 th Nov, 10 th December 2020
Local Headteachers	Zoom meetings 19 th June, 10 th Sep, 11 th December 2020

- 7.4 Views expressed by pupils at meetings have been captured in the consultation feedback. In addition, the school has worked with pupils to help them understand the closure proposal, seeking to reassure them that they would be fully supported throughout this period.

8. RESPONSES TO THE STATUTORY NOTICE (Second Stage Consultation)

8.1 The following written responses were received during the statutory notice period:

Total Responses	Agreed with proposal	Disagreed with the proposal
3	1	2

The three respondents identified themselves as:

- Parents of Shapla School pupil
- Local Resident
- Local Headteacher

8.2 Two of the three respondents disagreed with the proposed closure. The general themes from these two responses are as follows:

- Disappointment at the Local Authority's decision to disperse the Shapla children in September 2021 and concern that the decision was made without due regard to alternative courses of action.
- The view that the best location for the Shapla pupils is Shapla school, and the children should remain in this setting for as long as possible.
- That the decision to close the School in September 2021 seems to be purely financial and does not consider the social and emotional cost to the wellbeing of the Shapla community.
- Concern that there will not be enough places at other local schools for Shapla pupils if the School closes.
- Sadness over the closure of a school that has been at the heart of the local community and concern that the local area has become more business orientated.
- Concern over the effect that the closure will have on Shapla pupils causing them to be uprooted and forced to attend schools elsewhere.
- Concern that Shapla children will be placed in unfamiliar settings and amongst children and staff with whom they are unaccustomed. It will split friendship groups built up over several years; it may even split families.
- Children with special educational needs may find the transition particularly difficult so that it affects their cognitive and social development. The feelings of alienation and uncertainty they experience will come at a time when the school community is likely still to be recovering from the disruption wrought by coronavirus.
- That the Local Authority should consider an amalgamation with St Paul's School for a period of, say, three years. There would be no further intake

at Shapla School from September 2021 and children in current years 3, 4 and 5 would be allowed to complete their education as distinct Shapla pupils (in years 4, 5 and 6 respectively). Children in years below year 3 would be assimilated into St Paul's School, or other local schools.

8.3 The council has addressed all of the points raised in these general themes in:

- its analysis and response to the representations made to the Statutory Notice, **attached as Appendix 7**, and can also be viewed [here](#)
- the Equalities Assessment, which has been updated to address the representation following the statutory notice period and **attached as Appendix 2**;
- the previous report on the outcome of the first stage consultation published on the council website and with the earlier 21st October cabinet report, included again **as Appendix 6**.

8.4 In the analysis of the feedback received during both the first stage consultation and the statutory notice period, the council is able to draw some clear recognition that Shapla School is a good school that it is held in high regard within its community. The feedback to the statutory notice included an alternative proposal to school closure. However, when considering this proposal, based on the financial modelling and pupil place projections, it was apparent that this option would not be viable. It should also be noted that prior to issuing proposals for closure, the Shapla School governing body did consider alternatives, which included the possibility of a hard federation or amalgamation with a neighbouring school(s). This work was supported by the LA's independent consultant. The governing body's closer analysis of these alternatives determined that they would not be achievable, given the significant resourcing and other constraints.

8.5 The further statutory notice period of public consultation did not present any options that could be reasonably taken forward as an alternative to school closure.

9. TIMETABLE FOR IMPLEMENTATION OF SCHOOL CLOSURE

9.1 If the decision is made for Shapla Primary School to close, the timetable for implementation will be as follows:

Mid- March 2021	A staff consultation will be issued
April 2021	Pupils whose families choose to move them to alternative schools, immediately will do so from the first day of the Summer term i.e. April 2021*.
July 2021	Pupils who families choose for them to remain at Shapla until the end of the school year (July), will move to their new school from the first day of the Autumn term i.e. September 2021.
August 2021	Shapla School will continue to operate up until the 31st August 2020 and then formally close.

9.2 The table below shows the numbers on roll at Shapla at the start of the school year (October 2020) and the numbers at January 2021. *The Local Authority

has informed parents that their children should remain at Shapla until the end of the school year, even if a decision was made to close the School. However, some parents have taken action of their own volition to transfer their children to alternative schools earlier:

Year Group (2020/21)	Roll as at 1 st Oct 2020	In-Year Transfers*	Roll as at 4 Jan 2021
N	8	1	7
R	17	2	15
1	12	7	5
2	13	2	11
3	14	5	9
4	24	2	22
5	20	5	15
6	27	1	26
Total	135	25	110

- 9.3 The Local Authority, working with Shapla and neighbouring schools, will ensure that the remaining 110 pupils are able to take up alternative places by September 2021. The Local Authority’s Parental Engagement and SENDIAS services are already working with the families of vulnerable children and those with special educational needs to ensure that their school transfers are properly supported and they are able to make a successful transition.

10. EQUALITIES IMPLICATIONS

- 10.1 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.
- 10.2 An Equalities Assessment has been conducted by the LA and is attached at Appendix 2. This must be considered in detail before the Mayor in Cabinet considers the matters above, as part of his decision on whether to close Shapla Primary School.
- 10.3 The Equality Act 2010 requires the LA, when exercising its functions, to have due regard to eliminate discrimination, harassment, victimisation; advance equality of opportunity; and to foster good relations between persons who share a relevant protected characteristic and those who do not (“the Public Sector Equality Duty”).

11. OTHER STATUTORY IMPLICATIONS

(i) Managing the Impact of Proposed Closure on School Staff

11.1 Local Authority Officers and the Shapla Governing Body are working together to support the School staff through this change. A formal staff consultation will only take place once the final decision has been made on the School's closure. If the final decision is for the School to close staff will be supported through further training, coaching and workshops to find redeployment opportunities at other local schools.

(ii) Best Value Implications

11.2 The Local Authority has a duty to ensure that schools are fulfilling their duties and that value for public money is achieved, whilst standards are maintained. They must ensure that they do not fall into financial deficit so that they are unable to sustain an offer of quality education for children. This proposal is being considered in view of concerns over the School's viability and therefore its ability to sustain high quality education for its children.

11.3 The proposal presents significant mainstream revenue and capital implications for the council. When a School closes its finances (and any surplus or deficit) is returned to the Local Authority. In this case the deficit balance will transfer to the council.

11.4 Closure of Shapla will remove the School's deficit budget and the requirement for additional funding from the Dedicated School's Grant, (DSG). This will reduce the pressure on the DSG that is caused by having a number of schools requiring licensed deficits and ensures a more efficient use of resources across the school estate.

(iii) Environmental (including air quality)

11.5 There are no environmental issues arising from this proposal.

(iv) Risk Management

11.6 If this recommendation is agreed, the closure process will be carefully managed and evaluated in line with statutory guidance, mindful of the needs of the children, families and staff, and thoroughly addressing the considerations of the Equalities Assessment. The plan to close the School on the 31st August 2021 will allow enough time for arrangements to be completed by September 2021 and therefore minimise or mitigate any risks.

(v) Safeguarding

11.7 The report deals with the council's approach to managing the supply of school places for the local population. The efficient supply of school places contributes to the safeguarding of children by ensuring their access to good quality, sustainable education provision.

(vi) Data Protection / Privacy Impact Assessment

- 11.8 The proposals presented in this report have followed an initial and formal public consultation using a variety of mechanisms. All responses received through these mechanisms or made directly to council officers or members have been included in the analysis of the feedback received. These responses have only been used to assess the community's view of the proposals and not for any other purpose.
- 11.9 The council handles information in accordance with the Freedom of Information Act 2000 and the Data Protection Act 2018 and is the data controller for the purposes of the Data Protection Act 2018. For more information, the privacy notice for Pupil Services can be accessed [here](#).

12. COMMENTS OF THE CHIEF FINANCIAL OFFICER

- 12.1 The current and projected size of the School mean that they are unable to support the staffing infrastructure that is required with the levels of funding that are provided through the national funding formula. If the School continues overspending their funding allocation the costs of that overspend would fall on the council if closure was at a later date. Early action reduces the general fund exposure for the council

13. COMMENTS OF LEGAL SERVICES

- 13.1 Section 14 of the Education Act 1996 requires local authorities to provide sufficient schools for primary and secondary education in their area. Local authorities also have best value duties in the performance of their functions under the Local Government Act 1999.
- 13.2 The procedure for closing a school is set out in the Education and Inspections Act 2006, the School Organisation (Establishment and Discontinuance of Schools) Regulations 2013, and the statutory guidance 'Opening and Closing Maintained Schools' (November 2019). The proposals set out in this report comply with the above legislation and guidance.

Linked Reports, Appendices and Background Documents

Linked Report

- 21st October Cabinet Report - Outcome of the consultation on the proposal for the closure of Shapla Primary School

Appendices

Appendix 1	Statutory (Public) Notice (2 nd stage consultation)
Appendix 2	Equalities Assessment
Appendix 3	Public Consultation Paper (1 st stage consultation)
Appendix 4	Summary Analysis on the Current Financial Position of Shapla School
Appendix 5	LA Five Year Primary Aged Pupil Projections for the West of the Borough
Appendix 6	Public Consultation (1 st Stage) Feedback Report
Appendix 7	Analysis of the Responses to the Statutory (Public) Notice (copies of all responses to the Statutory Notice can be found here)

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

The following document(s) has been used in the preparation of this report:

- 'Opening and Closing Maintained Schools – Statutory Guidance for Proposers and Decision- Makers' (November 2019) in conjunction with Part 2 and Schedule 2 of the Education and Inspections Act (EIA) 2006 as amended by the Education Act (EA) 2011
- The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013

Officer contact details for documents: N/A

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Consultation information:

Statutory notice on the proposal for the closure of Shapla Primary School

16 November 2020



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Introduction

On Wednesday 21 October 2020 Tower Hamlets Cabinet approved the recommendation to publish a statutory notice to publish a statutory notice on the proposal to close Shapla Primary School.

Notice is given in accordance with Section 15 of the Education and Inspections Act 2006 (as amended by the Education Act 2011) and the School Organisation (Establishment and Discontinuance of Schools) Regulations 2013 that Tower Hamlets local authority intends to discontinue Shapla Primary School with effect from 31 August 2021.

Contact details

Name and address of Local authority publishing the proposal:

Tower Hamlets Council, Town Hall, Mulberry Place, 5 Clove Crescent, London E14 2BG.

Name, address and category of school proposed to be closed:

Shapla Primary School, Wellclose Square, Shadwell, London E1 8HY.

Implementation

Date on which it is proposed to close the school:

Tuesday 31 August 2021.

It is proposed to implement the closure as follows:

Following the closure of Shapla Primary School it is proposed for the remaining pupils on roll at that time to transfer to other primary schools in the local area. The local authority has identified sufficient vacancies at local 'Good' or 'Outstanding' primary schools within 0.6 miles from Shapla School, and within 0.7 miles of all current pupils' homes.

There are also vacancies at other schools in the areas to the west of borough, providing Shapla families with a range of options to secure a suitable school for their child. The local authority will endeavour to meet parental preferences for school places, where possible.

The local authority is already undertaking preliminary work with Shapla and other schools in the area on the necessary transition planning for children and families, should the Council decide for the school to close on the date proposed.

Reason for Closure:

The local authority, in partnership with the governing body of Shapla, has reluctantly determined that the school should now close due to a substantial decline in pupil numbers over an extended period and the associated impact on its educational and financial viability.

Pupil numbers in Tower Hamlets schools are currently falling in the west of the borough, where Shapla School is situated. This means that Shapla, along with other schools, has not had enough pupil numbers to fill its classes. The school is now well below its capacity in most of its year groups and this is causing increasing difficulty in maintaining a broad and balanced curriculum with enhanced extra-curricular activities.

The reduction in its pupil numbers has badly affected the school's budget. Protecting the quality of education has now led to Shapla having financial difficulties, with no capacity to repay financial support received from the local authority within the timeframe prescribed by central government.

The local authority is not allowed to continue to fund schools that are not financially viable and, after considering the alternative options available, it was determined that it would be necessary to propose for the school to close (see **Appendix 1** for the stage one consultation).

Pupil numbers and admissions

The numbers for whom provision is currently made at the school:

Shapla School is a co-educational mainstream primary school for pupils aged three to eleven. The school has a published admission number (PAN) of 30 for each year group, giving a total of 240 places (excluding nursery places).

As at 1 September 2020, the school had 142 pupils on roll.

Displaced pupils

From 1 September 2021, the pupils remaining on roll at Shapla Primary School will have the offer of places at other local schools no more than 0.7 miles from their current home address. There will also be opportunity for parents to secure places at schools within the surrounding area.

Current projections for school places indicate that there are enough places for future cohorts following the closure of Shapla Primary School. The local authority will continue to monitor the projected need for future school places and propose changes, if required, to ensure sufficient places are available.

Impact on the community

Shapla Primary School does not currently provide additional services or use of its facilities for the wider community and there are a number of alternative facilities

available for hire at other nearby locations. There will therefore be no loss of any enrichment clubs or programmes for local families in the community.

Rural primary schools

Not applicable.

Balance of denominational provision

Not applicable.

Nursery provision

Children currently attending the nursery provision at Shapla Primary School will be able to continue to do so until end of the current school year (July 2021).

They will then be able to transfer to the nursery provision at other local schools in the area or to the reception year at these schools, if they have reached primary school age.

Sixth Form provision

Not applicable.

Special educational needs provision

Shapla Primary School does not provide educational provision recognised by the local authority as being reserved for children with special educational needs. There are 44 pupils on roll (September 2020) who have been identified as having special educational needs (SEN support) and four pupils with an education health and care plan. The support for special educational needs pupils will continue in their new schools and the necessary transition arrangements will ensure their particular needs are met from the outset.

Travel

The approximate distances for home to school travel for pupils from Nursery to Year 6 currently attending Shapla Primary School ranges from 0.05 to 3.33 miles.

There are enough places at other nearby schools to ensure that the maximum distance any child would travel to school would be no more than 0.7 miles from their home address, unless the families decide to secure places at alternative schools with vacancies further way.

It is anticipated that pupils will walk or use other sustainable modes of travel to alternative schools in the local area and therefore any impact on road traffic would

be minimal. There is also enough local transport provision to cover the routes from home to school of current pupils.

Finances

When a school closes its finances (any surplus or deficit) is returned to the Council. Shapla's deficit balance will transfer to the Council on the School's last business day, Tuesday 31 August 2021.

Procedure for making representations (objections and comments)

Within four weeks from the date of publication of this statutory notice, any person may object to or make comments on the proposal by email or by post.

Closing date for responses is 5pm, Wednesday 16 December 2020

By email: school.organisation@towerhamlets.gov.uk

By post: School Organisation and Place Planning Manager
Pupil Services and School Sufficiency
Tower Hamlets Children and Culture
Town Hall
Mulberry Place
5 Clove Crescent
E14 5BG

We will not be able to consider any responses received after 16 December 2020.

All responses received during the representation period will be published on the Council's website in early January 2021.

The website address is: talk.towerhamlets.gov.uk/statutory-notice-shapla

Appendix 1

Consultation information:

First stage consultation feedback report on the proposal for the closure of Shapla Primary School

28 July 2020

Report compiled by Dr Helen Jenner, Independent Consultant, Tower Hamlets Primary Review.

Introduction

This report summarises the planning undertaken to lead to a public consultation, and the responses to that consultation, on whether Shapla Primary School Governing Body should support the Local authority to formally consult on the closure of Shapla Primary School. The report aims to support the governors' steering group to reach an informed decision at their meeting in September 2020.

Background

Shapla Primary School Governing Body was prompted by the Tower Hamlets Primary Review¹ to consider the sustainability of Shapla Primary School, given its vulnerability to falling rolls, and reluctantly reached the conclusion that to close the school and relocate children to other nearby schools may be the best solution to optimising educational provision in the area.

The Tower Hamlets Primary Review commissioned an independent consultant, Dr Helen Jenner, to work with schools they had identified as being at risk due to demographic change in the borough. As well as working with the schools, Dr Jenner was asked to produce a public report "Future Ambitions²" setting out principles for developing school relationships for resilience and excellence.

This document was shared with all Headteachers, Unions and Governors in March 2019. Regular updates on the Primary Review have been included in the termly Director's Report for Governors.

Governors planning

A Steering Group consisting of the Chair, staff governor, parent governor and Headteacher from Shapla, supported by the independent consultant has led the work on considering the implications of the review for Shapla.

¹ www.towerhamlets.gov.uk/ignl/education_and_learning/schools/Primary_Review_for_parents.aspx

² https://www.towerhamlets.gov.uk/Documents/Children-and-families-services/Schools/Primary_Review/Future_Ambitions_report_from_the_independent_consultant_Feb_2019.pdf

Governors and the Headteacher have met, in various groupings, regularly since the local authority first identified the school as being “in scope” for review, in July 2018.

An Informal governing body meeting with governors was held on Monday 10 February to discuss the Primary Review, the Future Ambitions report, and the best responses for the school.

This informal meeting recognised the likelihood of a proposal to close Shapla school. The governing body met again, virtually, on Wednesday 25 March to consider and agree arrangements for informal consultation.

Local Headteachers met (virtually) on Friday 20 March to consider the possible proposal. This same group, and a wider group of Headteachers whose schools might be affected met again on Friday 19 June.

A consultation document³ was prepared and agreed with the local authority. This was given in paper copy to all parents, circulated to Tower Hamlets Headteachers, through the Headteacher’s Bulletin; emailed to staffing unions; and, the Secretary of State has been notified of potential changes.

Information about the consultation was also placed on the school website:

<https://shapla.school/consultation/>

This included a letter to parents and staff from the Chair of Governors, a copy of the consultation document, and three short videos explaining the situation.

Due to Coronavirus it was not possible to hold public meetings regarding the consultation, however, the following options were offered (in line with the Tower Hamlets consultation processes during coronavirus guidance for schools’ consultations):

1. A response form (or any other written format) at the end of the consultation document to record views to be emailed, posted or handed to the school.
2. A special email address was set up for comments consult@shapla.school.
3. A box was set up in the playground at Shapla Primary School where people could leave comments, response forms, and any questions.
4. The Local authority consultant was available for one-to-one socially distanced questions/feedback on Monday 13 July 2020 from 10.15am to 2.30pm.
5. Virtual meetings were set up on 13 July for staff (4pm) and parents (9am - this did not go ahead, due to no demand; and 6pm).
6. Personal phone calls were also offered.

Governors agreed that responses from the different forms of consultation should be summarised in a report for governors, to be sent to the Steering Group, by the end of

³ Included in Appendix “Supporting Documents”

July 2020, following which recommendations would be made to the Shapla Governing Body as to whether they should support the local authority's proposal to move to statutory consultation.

Consultation response

Written responses

Fourteen (14) written responses and one email response from a school governor were received. All of which showed that parents feel their children have been well supported by the school. They are sad that there is a consultation regarding the closure of the school.

Six (6) parental responses and one governor response said they did accept the proposal.

Eight (8) parental responses said they did not. One of these eight commented that they did however, understand the reasons for the proposal.

Comments recorded on the forms included:

- Love the school (3)
- Children are happy and settled (3)
- We like the low numbers (2)
- The school is close to home (2)
- We don't think our children will like the disruption (4)
- We need support for transition, particularly special educational needs, and keeping siblings together (5)
- Couldn't we pair with another school (3)

Two (2) emails were received – one returning a response form (included in the information above) and the other requesting to join the Zoom meeting.

Zoom, and one-to-one meetings

Friday 27 March

Tower Hamlets Union's briefing.

Friday 19 June

Headteachers meeting: 12 Headteachers, two Tower Hamlets partnership officers, two local authority officers and the independent consultant 19 June 2020.

Monday 13 July

Parents meeting: Chair of Governors, Headteacher, independent consultant and 15 parents.

Staff meeting: five members of staff met one-to-one with the independent consultant.

Monday 20 July

Tower Hamlets National Education Union (NEU) representative: telephone conversation with the independent consultant.

The following was raised at staff meetings:

- Is this process happening too quickly?
- Is a consultation during Coronavirus appropriate?
- Was amalgamation with another school considered?
- Have all funding avenues been explored?
- Will there be enough places for children?
- How can we be guaranteed places at our first choice of replacement school?
- Staff are not clear what options will be open to them when
- Will staff have to be redeployed
- What are the redundancy and redeployment options?
- Will staff be able to access training next year?
- How should schools respond if parents approach them directly for places?

Verbal responses were given to all the questions raised.

Feedback to stakeholders

It is recommended that this consultation feedback report and frequently asked questions, be posted on the school's website and emailed to parents, staff and other stakeholders.

In consultation with the NEU, and circulated to other unions, a guide to HR processes for staff has been provided, explaining what will happen and when over the next year. This was sent to staff at the end of the Summer Term.

The Headteachers from other schools have requested an update via Zoom meeting in September. This will be set up for Thursday 10 September, 2pm.

Governing body next steps

Shapla governing body will meet in September to consider this feedback report and whether they are recommending that the local authority move to publish statutory notices. A decision will be made regarding the proposal at the Council Cabinet meeting in October 2020.

View of the independent consultant

Whilst parents, staff, pupils, and parents appreciate their school, they recognise that numbers have fallen and understood why this proposal is being made. Many are resigned to the likelihood of closure, and several parents have moved to find alternative places at neighbouring schools.

The majority of the parents and all of the staff and governors are completely committed to a final year together to celebrate the contribution Shapla has made to education and the community, whatever decision is reached in March 2021.

The reflective responses from parents and commitment of staff and governors should be commended.

[ENDS]

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Equality Impact Analysis: (EIA)

Section 1: Introduction

Name of Proposal: Closure of Shapla School

For the purpose of this document, 'proposal' refers to a policy, function, strategy or project)

Service area & Directorate responsible **Pupil Services, Children & Culture**

Name of completing officer **Elizabeth Freer**

Approved by Director/Head of Service **Terry Bryan**

Date of approval **14th January 2021**

Conclusion - To be completed at the end of the Equality Impact Assessment process

This summary will provide an update on the findings of the EIA and what the outcome is. *For example, based on the findings of the EIA, the proposal was rejected as the impact on a particular group was disproportionate and the appropriate mitigations in place. Or, based on the EIA, the proposal was amended and alternative steps taken)*

Based on the findings of this EIA, there are no significant issues to prevent moving to the next stage of formal consultation, which is to proceed to the issuing of the statutory notice. This will provide further opportunity for parents, pupils, staff and wider community to give their views and raise any objections.

This proposal will require further analysis of the equalities data on staff who are at risk of redundancy, should the proposal to close the School move forward.

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity between those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them



Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

This Equality Impact Assessment provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above, for more information about the Council's commitment to equality; please visit the Council's website.

Section 2 – General information about the proposal

Provide a description of the proposal including the relevance of proposal to the general equality duties and protected characteristic pursuant to Equality Act 2010.

Planning for School Places - Closure of Shapla School

This Equality Impact Assessment concerns the proposal to close Shapla School at the end of the 2020/21 academic year. The Local Authority has identified sufficient vacancies at other local schools within close proximity to Shapla, and within a reasonable distance of all current pupils who will require to transfer to a different primary school if Shapla closes. Across the west of Tower Hamlets there are also vacancies in many other schools, giving families a reasonable degree of choice. The neighbouring schools are in a stronger financial position. Shapla is currently rated "Good" by the regulatory body, OFSTED, but there is a risk that the quality of education and the continued access for pupils and their families to extended services and facilities might begin to fall at Shapla, despite the best efforts of the Headteacher, staff and governors.

Tower Hamlets has a great tradition of excellent education; it values the important role that schools have in increasing the life chances of its children. However, the borough is now in a position where there is the need for longer term planning to maintain the success and future sustainability of its schools. The LA's strategic approach in ensuring the sufficiency and quality of its primary school provision on a locality basis, across the borough, is therefore designed to provide Tower Hamlets with an appropriate mix and number of high performing, financially sustainable schools.

Demand for school places is driven by population growth and housing development. Although population growth in Tower Hamlets is amongst the fastest in the country, it has not translated into the expected increased demand for primary school places across the borough. Falling birth rates, changing resident demographics and young families migrating out of the borough have resulted in a significant surplus of primary school places in some areas of the borough. As of January 2019, there was a 6.5% surplus in primary school places (1656 were unfilled). This is over the recommended 5% surplus that urban local authorities are recommended to operate with. The 5% surplus is designed to allow local authorities to meet their statutory duty to provide sufficient school places, yet still enable parents to have some choice of schools.

The impact of falling rolls in certain areas of the borough, reductions in education funding and schools in financial deficit, present a number of challenges. The significant pupil population changes are affecting schools across the Borough and have resulted in additional pressures for schools in the West. These pressures are not only a reflection of a reduction in their pupil numbers, but also a combination of cash flat Dedicated Schools Grant (DSG) allocations over several years and the national school funding formula changes affecting Tower Hamlets and other London Boroughs. The national funding formula changes came into effect back in 2018-19, but it is evident that the impact in Tower Hamlets will really begin to be felt by schools from this point onwards, as minimum funding guarantees reduce and end.

It has therefore been necessary to consider making changes that will ensure we have the right provision in the right place at the right time going forward. Provision that can be well resourced and is of high quality will enable schools to continue to thrive and offer the opportunities that children deserve: a strong curriculum with excellent teaching, enriching activities and a joyful experience at primary school.



As of January 2019, in the Wapping catchment area, where Shapla is located, there were 480 reception places available. In January 2019 there were 62 unfilled places, equating to two FTE classes. Projections indicate this will increase to 92 unfilled places by 2027 (three FTE classes). The review aims to safeguard the high-quality provision that exists within our schools and is being developed in collaboration with school leaders and other key stakeholders.

The work is being planned and supported through the LA’s work with the Tower Hamlets Education Partnership (THEP), which plays a key role in enabling schools to meet the challenge of ensuring that all children and young people in Tower Hamlets achieve the best possible outcomes and can flourish if schools are working in effective partnerships. Ultimately, the guiding principle for this work is that whatever is done should be in children’s interests, looking at a range of achievable options that will enable proper opportunity to decide how best to deliver a high quality and sustainable provision. Access to good quality school places is essential to raising achievement and addressing poverty and inequality in the long term.

The reorganisation of school provision and the development of new schools in certain areas of the borough should have a positive impact on all groups by improving accessibility, increasing parental choice and promoting inclusive education.

An Independent Consultant has also been commissioned by LBTH to work with schools, such as Shapla, which were identified as being at risk due to demographic change in the Borough. As well as working with schools, Dr Jenner was asked to produce a public report “Future Ambitions”¹ setting out principles for developing school relationships for resilience and excellence. This document was shared with all Headteachers, Unions and Governors in March 2019. Regular updates on the Primary Review have been included in the termly Director’s Report for Governors.

Section 3 – Evidence (Consideration of Data and Information)

What evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

Shapla is a small school so, as pupil numbers have fallen (Chart 1), the budget has been greatly impacted. For example, in the academic year 2019/20, Reception, Yr1 and Yr2 had below 20 children (Chart 2). Protecting quality education led to Shapla facing significant financial challenge, with no capacity to repay financial support received from the Local Authority within an acceptable time frame without damaging the quality of education for pupils. The Local Authority are not allowed to continue to fund schools that are not financially viable, especially when you consider the further impact of the changes to the National Funding Formula.

Chart 1: Reception Application 2017-2020 by preference (LBTH School Admissions)

Schools	PAN	1st Pref	2nd Pref	3rd Pref	4th Pref	5th Pref	6th Pref	Total 20/21	Total 19/20	Total 18/19	Total 17/18
Bigland Green Primary School	60	85	58	20	14	3	5	185	169	200	173
Blue Gate Fields Infant	90	91	35	15	10	3	6	160	155	189	198
Canon Barnett Primary School	30*	19	16	5	1	3	1	45	50	50	46

¹ The Future Ambitions Report is available on the Tower Hamlets Primary Review Website.



English Martyrs Roman Catholic Primary School	30	31	18	8	10	3	1	71	54	90	63
Harry Gosling Primary School	60	51	30	17	6	4	1	109	103	108	104
Hermitage Primary School	45	29	22	13	6	2	6	78	78	72	91
Shapla Primary School	30	12	11	8	3	2	2	38	39	45	72
St Mary and St Michael Primary School	60	44	13	18	3	3	4	85	82	116	127
St Paul's Whitechapel CofE Primary School	30	31	4	8	7	5	4	59	71	86	84
St Peter's London Docks CofE Primary School	30	41	23	9	6	4	2	85	70	84	93
Grand Total	465	434	230	121	66	32	32	915	871	1040	1051

Chart 2: Shapla Year Groups (Spring Census 2020)

School	Year Groups									Total
	N1	N2	R	1	2	3	4	5	6	
Shapla	21	2	13	15	18	25	25	28	29	176

Implications for children

The children will be able to stay at Shapla until the end of the Summer Term 2021, when the current Yr. 6 will then transition to secondary school. Families will be supported to move to neighbouring schools during the Summer Term, if the decision to close is agreed. There are enough vacancies available at neighbouring schools to accommodate all children attending Shapla (Chart 3). The Local Authority has recommended that the group of schools that children transition to is fairly small, to reduce travel distances, but also to support children to transition with other children that they know. However, families who wish to consider other schools closer to their homes will also be supported to do so.

Parents will be able to apply to those schools, and places will be allocated using the usual Tower Hamlets admissions criteria in the Summer Term 2021.

Chart 3: Vacancies at neighbouring schools per year group (LBTH Oct 2019 data)

Please note: Yrs. 5 and 6 are not included in this graph as the pupils who were in Yr 6 in Oct 2019 moved onto secondary school in Sept 2020, and pupils in Yr 5 at the time of this data will have transitioned onto secondary school in Sept 2021. Therefore, children in these age groups are unaffected by this proposal.

School	PAN	Reception	Y1	Y2	Y3	Y4
Shapla	30	14	16	18	25	25
Harry Gosling	60	52	58	52	58	42
St Paul's	30	28	27	28	29	25
Hermitage	45	39	34	39	27	42



English Martyrs	30	29	30	26	25	28
Kobi Nazrul	30	30	30	30	30	25
Numbers	225	192	195	193	194	187
Vacancies		33	30	32	31	38

A full programme to support children through this difficult period will be put in place, with the aim of helping them to recognise that moving school presents new opportunities as well as acknowledging how they have benefitted from their education at Shapla. This will include open days at nearby schools so that parents are able to visit schools now that they have reopened.

Parents will also be given the opportunity to apply for their children to move to other schools before August 2021 through the in-year admissions process.

Consultation

Shapla School Governing Body was prompted by the Tower Hamlets Primary Review to consider the sustainability of Shapla Primary School, given its vulnerability to falling rolls, and reached the conclusion that to close the school and relocate children to other nearby schools may be the best solution to optimising educational provision in the area.

A Steering Group consisting of the Chair, staff governor, parent governor and Headteacher from Shapla, supported by the Independent Consultant has led the work on considering the implications of the review for Shapla.

Governors and the Headteacher have met, in various groupings, regularly since the Local Authority first identified the school as being “in scope” for review, in July 2018.

An Informal Governing Body meeting with governors was held on 10th February 2020 to discuss the Primary Review, the Future Ambitions Report, and the best responses for the school. This Informal meeting recognised the likelihood of a proposal to close Shapla school. The Governing Body met again, virtually, on March 25th, 2020 to consider and agree arrangements for informal consultation.

Local Headteachers met virtually on 20th March 2020 to consider the possible proposal. This same group, and a wider group of Headteachers whose schools might be affected met again on 19th June 2020.

The informal consultation period started on 8th June and ended on 17th July 2020. It was originally planned to start in the first half of the Summer Term 2020, but it was delayed as the implications of coronavirus were considered. After careful consideration, the governors and the LA felt that not to begin consultation in the latter half of the Summer Term was unfair on families and that, by starting to consult, the parents of children due to start in reception in September would have the opportunity to find a different school for them to start their school career where they would be able to remain and avoid another transition.

A consultation document was prepared and agreed with the Local Authority. This was given in paper copy to all parents, circulated to Tower Hamlets Headteachers, through the Headteacher’s Bulletin, emailed to trade unions, and the Secretary of State has been notified of potential changes.

Information about the consultation was also placed on the school website: <https://shapla.school/consultation/> This included a letter to parents and staff from the Chair of Governors, a copy of the consultation document, and 3 short videos explaining the situation.

Due to the limitations imposed on public gatherings by COVID-19, it was not possible to hold face to face meetings for larger groups at the school or elsewhere. In order to ensure that pupils, parents, staff and the wider



community were able to engage with and respond to consultation a range of opportunities were organised as follows:

- A response form (or any other written format) at the end of the consultation document to record views to be emailed, posted, or handed to the school.
- A special email address was set up for comments
- A box was set up in the playground at Shapla School where people could leave comments, response forms and any questions.
- The independent consultant was available for 1 to1 socially distanced questions/feedback on Monday 13th July
- Virtual meetings were set up on July 13th for staff and parents
- Personal phone calls were offered.

Governors agreed responses from the different forms of consultation should be summarised in a report for Governors, to be sent to the Steering Group, by the end of July 2020. The Steering Group reviewed feedback and used it to make a response to the council, on whether or not to recommend proceeding with the school merger proposal. A report summarizing the feedback on the consultation will be available for staff and parents during the first half of the Autumn Term 2020.

Other Evidence

Financial position of Shapla

Ofsted reports

Pupil projections

School census data of Shapla and neighbouring schools

Demographic data held on current staff and pupils at Shapla and neighbouring schools

Equality Act 2010

Minutes of meetings where the future of Shapla has been discussed

Shapla School Organisational Change Procedure

Consultation Document

Consultation Feedback Report

School Policies (Equalities, SEND and Inclusion)

School Admissions Code

Name of officer completing the EIA: Elizabeth Freer

Service area: C&C SPP

EIA signed off by: Terry Bryan

Date signed off:



Section 4 – Assessing the impacts on residents and service delivery

	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?																												
Age (All age groups)			X	<p>A change to schools during any phase of education can be viewed as possibly disruptive. However, year 6 children who left in Summer 2020 will not be impacted, nor will the current year 5 who will also have transitioned to secondary school if this proposal is implemented in September 2021. In addition, the change is proposed to take place between academic years and therefore allow a new start at an appropriate time in each pupil's yearly academic progression, minimising disruption.</p> <p>Therefore, the impact of closure would affect younger pupils at the school. Children moving from reception to y1 may be particularly vulnerable, as may those moving from year 1 to year 2, the year in which children take their SATs. However, the numbers at Shapla for these year groups will be relatively low at 119 pupils. In addition, the educational outcomes for these children should not be adversely impacted by the move to a new school and, could be improved. This is because the Ofsted standard is either 'good' or 'outstanding' for all primary schools.</p> <p>As evidenced by the graph below, each school has particular strengths and these strengths may well allow parents of children at Shapla to decide which of them they would like to apply to, should the proposal go ahead.</p> <table border="1"> <thead> <tr> <th></th> <th></th> <th colspan="3">Progress Score</th> <th>LA Average 72%</th> <th>LA Average 14%</th> </tr> <tr> <th>School</th> <th>Ofsted Grade</th> <th>Reading</th> <th>Writing</th> <th>Maths</th> <th>Pupils meeting expected standard in reading, writing and maths</th> <th>Pupils achieving at a higher standard in reading, writing and maths</th> </tr> </thead> <tbody> <tr> <td>Shapla</td> <td>Good</td> <td>Well above average</td> <td>Average</td> <td>Average</td> <td>80%</td> <td>5%</td> </tr> <tr> <td>Harry Gosling</td> <td>Good</td> <td>Well above average</td> <td>Above average</td> <td>Above average</td> <td>68%</td> <td>10%</td> </tr> </tbody> </table>			Progress Score			LA Average 72%	LA Average 14%	School	Ofsted Grade	Reading	Writing	Maths	Pupils meeting expected standard in reading, writing and maths	Pupils achieving at a higher standard in reading, writing and maths	Shapla	Good	Well above average	Average	Average	80%	5%	Harry Gosling	Good	Well above average	Above average	Above average	68%	10%
		Progress Score			LA Average 72%	LA Average 14%																										
School	Ofsted Grade	Reading	Writing	Maths	Pupils meeting expected standard in reading, writing and maths	Pupils achieving at a higher standard in reading, writing and maths																										
Shapla	Good	Well above average	Average	Average	80%	5%																										
Harry Gosling	Good	Well above average	Above average	Above average	68%	10%																										



St Paul's	Outstanding	Well above average	Above average	Well above average	90%	17%
Hermitage	Good	Average	Average	Average	66%	11%
English Martyrs	Good	Average	Average	Average	81%	27%
Kobi Nazrul	Good	Average	Average	Average	74%	7%

It is recognised, through the analysis, there is a need to ensure that siblings would be able to attend the same school, should Shapla close. Although the LA cannot guarantee all parents will get their first preference, it is committed to ensuring that siblings remain together and this will be achieved through the application of the admissions process.

In response to parents expressing concerns during the informal consultation period about the impact on their children should Shapla close, there is a commitment that staff at Shapla school will help to arrange visits for the children to their new schools, and for teachers from those schools to visit Shapla. Just as the end of every Summer Term includes celebrations for Year 6 leavers, if the school closes in Summer 2021 there will be a full programme of events and activities to support the children and staff to manage the changes.

The Shapla financial position is such that it is recognised that were it remain open this would eventually adversely affect the quality of education that the school has been able to provide, thereby impacting on children of all ages.

There will also be an impact on staff at the school, who could be made redundant under the proposal. The spread of staff across the age bands is fairly even, with those under 30 and above 60 less affected than those aged 30-59. Staff in their 40s will be more affected than other age groups. If we compare Shapla to its neighbouring schools, it is evident that most schools have a staff group where the age groups are more heavily weighted:



School	% Staff in each age group					
	20s	30s	40s	50s	60s	70s
Shapla	8	19	39	25	8	0
Harry Gosling	32	39	17	7	4	0
St Paul's	18	27	27	21	3	3
Hermitage	10	40	16	28	6	0
English Martyrs	8	8	24	42	12	8
Kobi Nazrul	8	50	29	30	0	0

Further interrogation of the data needs to be done in order to assess what job roles are currently allocated at Shapla to each age range. This will help to determine whether staff in those age ranges will be disproportionately affected or not. Appropriate support and training will be provided to staff to ensure that they are able identify and access job opportunities. Support will be provided to the school's senior leaders and governing body to ensure that they are to fulfil their role effectively supporting staff throughout the process.

X

Pupils

At Shapla, of the children who will not have transitioned to secondary school at the proposed time of the school closing, 2% have an EHCP and 6% have SEND support. Whilst this EIA does not wish to minimise the impact a change of school can have on children with SEND, these numbers do not represent a disproportionate impact in children with SEND, especially as they will be given priority consideration for their preferred choice of school.

Over the academic year 2020/21, parents and teachers at both Shapla and their new school will have the opportunity to ensure a seamless transition for children with SEND, building on the support that has been provided at Shapla. Ofsted noted, "Pupils who have special educational needs and/or disabilities are difficult to identify in class because the support they receive is well focused and unobtrusive. As a result, these pupils are confident and learn quickly." This foundation, laid by Shapla, should help greatly if the proposal goes ahead and the children move to a new school. It would be prudent to bring the Annual Reviews for those children forward in order to ensure adequate time for any changes or additional support, if required, to be resourced.

Disability
(Physical, learning difficulties, mental health and medical conditions)

Staff

The number of staff with a disability is so low as to allow possible identification. Therefore, numbers will not be provided in this EIA. Although this does not represent a disproportionate impact on staff, any possible redeployment processes must be mindful of the needs of staff with SEND and take into account the Equality Act 2010 in order to ensure they are not discriminated against or disadvantaged by the process.

Sex

X

Pupils

The breakdown of gender for pupils at Shapla School is split evenly: 50% males and 50% female. None of the neighbouring schools are single sex schools. Therefore, there should not be a disproportionate impact on pupils of either sex. Indeed, the neighbouring schools do not have such an equal breakdown, so the movement of children from Shapla into those schools could help to balance this. In addition, as stated above, if Shapla were to remain open, there is the real risk that the financial difficulties would start to adversely affect the quality of education that the school has been able to provide, thereby impacting on children of all sexes.

Year	Female	%	Male	%	Total
N1	11	52%	10	48%	21
N2		0%	2	100%	2
R	8	62%	5	38%	13
1	8	53%	7	47%	15
2	12	67%	6	33%	18
3	7	28%	18	72%	25
4	11	44%	14	56%	25
5	14	50%	14	50%	28
6	17	59%	12	41%	29
Total	88	50%	88	50%	176

Staff

The staff gender breakdown is weighted heavily towards women at both schools (see table below), as is the



case across most primary school provision in the borough and elsewhere. As teaching roles are not gender specific, this should not have a disproportionate impact on future employment for female staff.

School	% Staff of each gender	
	Male	Female
Shapla	19	81
Harry Gosling	6	94
St Paul's	27	73
Hermitage	16	84
English Martyrs	4	96
Kobi Nazrul	18	82

Gender reassignment

X

No impact - We do not have any data available on this protected characteristic for pupils or staff.

Marriage and civil partnership

No impact - We do not have any data available on this protected characteristic for pupils or staff.

Religion or philosophical belief

X

No impact - we do not have any data available on this protected characteristic for pupils or staff. However, as Shapla is not a faith school, we do not expect there to be a disproportionate impact. It should be noted, however, that two of the neighbouring schools are faith schools, which may impact on parental choice: St Paul's is Church of England and English Martyrs is Roman Catholic.

Race

X

Pupils

The main ethnicity of children at Shapla, which corresponds to the main ethnicity in LBTH as per the 2011 census, is Bangladeshi. Therefore, this group will be impacted the most but is it not a disproportionate impact; more will be impacted owing to more children of that ethnicity attending.

Ethnicity	N1	N2	R	1	2	3	4	5	6	Total
Any Other Asian Background	1					2	1	1		5
Any Other Black Background					1					1



Any Other Ethnic Group			1	1			1	1		4
Any Other Mixed Background	1									1
Any Other White Background								1		1
Bangladeshi	19	2	12	12	15	21	20	24	25	150
Black - Any Other Black African Background				1	1	2	2	1	3	10
Indian				1						1
White - British									1	1
White and Black African					1		1			2
Total	21	2	13	15	18	25	25	28	29	176

The neighbouring schools that parents are likely to apply to, owing to travel distance and vacancies, have a similar demographic make-up as Shapla, bar one: English Martyrs. As this school is Roman Catholic, predictably there are far more White children attending, of British, Irish or Other backgrounds (65%).

The local authority does advise that multi-cultural schools are likely to be beneficial to fostering good relations between individuals in different ethnic and/or racial groups, as children will have the opportunity to make friends with children from different races to themselves at a formative stage of their personal development. However, there is also an awareness that some parents appreciate the option to choose a school where their child has representation on an ethnic level. Therefore, some parents with white children at Shapla may wish to move their child to English Martyrs for this reason.

School	% Bangladeshi
Shapla	85
Harry Gosling	87
St Paul's	66
Hermitage	61
English Martyrs	1
Kobi Nazrul	92

Staff

The breakdown of staff at Shapla evidences that no one ethnic group of staff will be impacted more than

others, although White British and Bangladeshi will be impacted most as more staff of those ethnicities are employed. As teaching roles are not specific to any one ethnicity, this should not have a disproportionate impact on future employment for staff and, as stated above, support and help will be given to all displaced staff to seek further employment, if so desired.

Ethnicity	Number	%
Any Other White Background	1	3
Bangladeshi	16	44
Black - Any Other Black African Background	2	6
Refused	1	3
White - British	15	42
White - Irish	1	3
Total	36	

Sexual orientation			X	No impact - we do not have any data available on this protected characteristic for pupils or staff.
Pregnancy and maternity			X	No impact - we do not have any data available on this protected characteristic for pupils or staff.

Other

Socio-economic			X	The percentage of children receiving FSM does vary across the neighbouring schools, with Shapla being one of the highest. However, as vacancies at neighbouring schools are not dependent on a parent's financial status, we do not anticipate this will have a negative impact on children. Indeed, the speed and agility at which schools
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in LBTH moved to support parents with food vouchers and food parcels during the closure of schools owing to COVID 19 suggests that any children with FSM eligibility will be well supported at school in LBTH.

School	% Students on FSM
Shapla	31%
Harry Gosling	39%
St Paul's	20%
Hermitage	21%
English Martyrs	6%
Kobi Nazrul	16%

The Council may wish to consider whether uniform grants will be provided for parents to purchase a new school uniform if this is required. The uniform grant could resemble the current school clothing grant that is provided for children when they transfer from primary to secondary school.

Parents/Carers

X

During the informal consultation period, parents raised several questions. They felt Shapla is a good school, so the closure should be staggered over several years, asked if St Paul's schools could "look after Shapla" or another school amalgamate with Shapla. They also wanted to know if small classes could still be kept, or if additional money could be found to support Shapla until numbers increased, all good questions.

Shapla is in financial difficulties and, as soon as consultation starts, parents and staff begin to consider their future and some move on. Waiting for numbers to increase or staggering the closure would not result in a positive experience for the remaining staff or children. St Paul's, as with all neighbouring schools, is willing to help Shapla but the financial burden of running a building with too few children in each class would only exacerbate the current financial issues Shapla is facing. No nearby schools have enough space to amalgamate with Shapla.

Small classes, although liked by parents, are no longer financially viable as the funding from central government is not enough to support them. In addition, Local Authorities are no longer allowed to make loans to struggling schools that cannot be paid back within three years.

Parents and carers should continue to be heavily involved in the consultation process and beyond, should the proposal progress. We are cognizant that this change, after an already stressful few months of lockdown, can



				be difficult and support should be offered to support parents throughout this process, should the proposal progress.
People with different Gender Identities e.g. Gender fluid, Non-Binary etc			X	No impact - we do not have any data available on gender identity for pupils or staff.
AOB				

Section 5 – Impact Analysis and Action Plan

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
<ul style="list-style-type: none"> Further analysis of workforce data needs to occur Further analysis of vacancies to ensure that siblings could move to the same school 	<ul style="list-style-type: none"> Request current workforce data from Shapla Data on siblings to be requested from school 	<p>By end of statutory consultation period, if the proposal progresses to that stage</p> <p>By end of statutory consultation period, if the proposal progresses to that stage</p>	<p>EF</p> <p>EF</p>	Data requested



<ul style="list-style-type: none">• Bring Annual Reviews for pupils with SEND at Shapla forward• Provide support for parents/carers <p>Is this enough given the negative impact for age – do we think that assessment is right? Could it be neutral given what the text above says about low numbers and no adverse impact on children</p>	<ul style="list-style-type: none">• Assess whether any additional resources or support would be needed if the child was to transition to a new school• Parent and Family Support Service to offer targeted support	<p>By end of statutory consultation period, if the proposal progresses to that stage</p> <p>Ongoing throughout academic year</p>	<p>J'OS</p> <p>JM</p>	
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Section 6 – Monitoring

Have monitoring processes been put in place to check the delivery of the above action plan and impact on equality groups?

Yes?





No?

Describe how this will be undertaken:

The Primary Review group will monitor and review the action plan

Appendix A

Equality Impact Assessment Decision Rating

Decision	Action	Risk
<p>As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act. It is recommended that this proposal be suspended until further work is undertaken.</p>	<p>Suspend – Further Work Required</p>	<p>Red</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.</p>	<p>Further (specialist) advice should be taken</p>	<p>Red Amber</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p>	<p>Proceed pending agreement of mitigating action</p>	<p>Amber</p> 
<p>As a result of performing the EIA, the proposal does not appear to have any disproportionate impact on people who share a protected characteristic and no further actions are recommended at this stage.</p>	<p>Proceed with implementation</p>	<p>Green:</p> 

Public Consultation (1st Stage) on the proposal to close

Shapla Primary School

The Proposal

The London Borough of Tower Hamlets, in partnership with the governors of Shapla School, have taken the necessary, but sad, decision to propose the closing of Shapla School from September 2021, and to re-locate the children attending Shapla School to other near-by schools.

Why are we proposing this change?

Pupil numbers in Tower Hamlets schools are currently falling, particularly in the West of the borough where our school is situated. This means that Shapla School, along with other schools, has not had sufficient numbers to fill our classes and, from Year 3 and younger, all have year groups below 20 children.

We are a small school, so as our pupil numbers fell, this affected our budget badly. Protecting quality education led to Shapla having a financial difficulties, with no capacity to repay financial support received from the Local Authority within an acceptable time frame. The Local Authority are not allowed to continue to fund schools that are not financially viable.

Our school already works closely with neighbouring schools, and the Local Authority has identified sufficient vacancies within 0.6 miles from Shapla, and within 0.7 of all current pupils' homes, to accommodate all of the children currently attending Shapla. Across the West of Tower Hamlets there are also vacancies in many other schools.

To support Shapla through this difficult period other school Headteachers have agreed to be proactive in helping transition planning.

What would happen to our Headteacher?

John Musgrave Bolanos, our Headteacher, has made an important positive contribution to Shapla and has worked hard to ensure the quality of education has been strengthened. As with all the staff, he will be supported to consider his future options, and is recognised as a strong local Headteacher. He will continue to be Headteacher at Shapla School until September 2021, unless he is appointed elsewhere.

Why close Shapla School?

It is important to stress that the closure is not a judgement on the quality of education at Shapla School, our excellent staff or our lovely children. It is the sad fact that there are fewer children in Tower Hamlets and one form entry schools, that are not full, are facing financial challenge.

Unfortunately, Shapla School has faced significant financial challenge, requiring funding from the Local Authority which it cannot repay without damaging the quality of education for the children.

Neighbouring schools have capacity for all the Shapla children to be accommodated within schools that are in a stronger financial position. Although provision at Shapla is currently good, there is a risk that the quality of education and the continued access for pupils and their families to extended services and facilities might begin to fall at Shapla, despite the best efforts of the Headteacher and staff and governors.

What will it mean for the children?

The children will be able to stay at Shapla until the end of the Summer Term 2021.

Families will be supported to move to neighbouring schools, during the Summer Term, if the decision to close is agreed.

The Local Authority recommends that the group of schools is fairly small, so as to reduce distances, but also to support children to transition with other children that they know. However, families who wish to consider other schools, closer to their homes, will be supported to do so.

Parents will be able to apply to those schools, and places will be allocated using the usual Tower Hamlets admissions criteria in the Summer Term 2021.

A full programme to support children through this difficult period will be put in place, with the aim of helping them to recognise that moving school presents new opportunities as well as recognising how they have benefitted from their education at Shapla. This will include open days at nearby schools so that parents are able to visit once schools have returned after the Coronavirus epidemic.

Parents who wish can apply for their children to move to other schools before August 2021 through the in-year admissions process.

What will it mean for the staff?

Staff at Shapla School will be supported to find redeployment opportunities at other local schools. They may also have the opportunity to consider voluntary redundancy. Wherever possible Tower Hamlets tries to avoid compulsory redundancy. If the proposal does go ahead staff, and their unions, will be involved in a School Re-organisation staffing process consultation, from March 2021.

What happens to the school building?

At this stage of the proposal there are no specific plans for the building. These will be considered if the proposal progresses to statutory notice later this year. One idea would be to keep the tree area and football pitch to create a Shapla Forest School area, which could be run by St Pauls School and be available for all schools to use - contributing to re-greening the Borough. The main part of the school buildings could be leased for other educational uses.

Procedure to achieve the closure

It is proposed that there will be no further admissions to Shapla School from September 2021.

All responses to this consultation will be put together in a report to governors and the Local Authority. The Local Authority will then decide, at its November 2020 meeting, whether to move to statutory notice - a formal publication of a document explaining the closure and its impact. Stakeholders are then able to make representations to the Local Authority before a final decision is reached early in March 2021.

If the proposal goes ahead and the Local Authority Cabinet does decide to close the school, all the children at Shapla will transition to new schools by September 2021, when Shapla will formally close.

Admissions

Children will continue to be able to go to Shapla School until July 2021. During the Summer Term 2021 the Local Authority Admissions Team will work with the school to allocate places in the nearest to home schools, using a parental preference system, and applying the existing Admission criteria.

If parents are interested in moving their children to a different school before July 2021, they are able to apply using the Tower Hamlets In-Year Admissions process.

https://www.towerhamlets.gov.uk/ignl/education_and_learning/schools/school_admissions/in-year_admissions.aspx

Children should not move school, other than at the end of the school term.

Why are we consulting you?

We want to consult you to gather your views because you are an essential part of the school community. The governing body of the school and the London Borough of Tower Hamlets cannot simply decide to make changes to schools without first seeking the views of parents and others. There is a legal process which must be followed before changes can be made, and it is important that the governing body and the council hear your views before deciding whether to proceed.

This document will be provided for all parents and staff. It is also on the school website, along with some short videos.

We have organised the following opportunities for parents and carers to share views.

1. You can use the response form (or any other written format) at the end of this document to record your views. It can be posted to the school, or emailed to

consult@shapla.school

2. There is a box in the playground at Shapla School where you can leave your comments,

response forms and any questions.

3. The Local Authority consultant, who is supporting the school with the consultation process, will be available for 1 to1 socially distanced questions/feedback on Monday 13th July from 10.15 - 2.30. You can contact Shapla School to book a 15 minute slot.

4. Virtual meetings will be set up on July 13th:

Staff 4pm

Parents 9am and 6pm

To join them please contact the school and provide your email address so that you can be invited.

5. If you would like someone to phone you so you can discuss your views please let your school office know and provide some times that would suit you and your phone number.

6. The Parental Engagement Team will organize small group “Time to Talk” video sessions later in June, where there will be informal opportunities for parents to talk together.

6. School staff will create age appropriate ways of consulting with our children on their views as part of their on-line teaching.

What happens next?

The informal consultation period starts on 8th June and ends on 17th July 2020 – the last page of this document can be used for you to feedback your view to governors. It should be returned to the school office. Following the consultation process, the governors’ steering group body will review your feedback and use it to make a response to the council, on whether or not to recommend proceeding with the school merger proposal. A report summarizing the feedback on the consultation will be available for staff and parents during the first half of the Autumn Term 2020.

The full governing body of the school will consider your feedback in its representations following the publication of the formal statutory notice, if the Council decide to move to this stage at their Cabinet meeting in November 2020.

If the Council decides to proceed, a public notice (the statutory notice) will specify details of the final proposal and there will be a period of at least four weeks when representations can be made. This will be the final opportunity to make any comments on the proposal. It is then anticipated that a final decision on whether to close the school will be made by the council by March 3rd 2021.

How can I get more information on the proposal?

The LA will publish the feedback from the consultation on the council’s website during the Autumn Term.

If permission is granted to publish a public notice, further details of this proposal will also be available in the Consultation sections of the Council's website, and our school website.

<https://shapla.school>

This has been a sad decision for Shapla governors and the Local Authority. Shapla School was created when there was a sudden influx of children into the West of Tower Hamlets, now the population has changed again and in future, we cannot afford the wonderful education and community you have come to expect at Shapla School. There are not enough children to fill all the schools in the West of the Borough so some have to close, or amalgamate. After careful consideration we think now is the right time to close Shapla and help our children and families join new educational communities so that they can thrive.

We are aware that this is a stressful time for everyone because of the coronavirus challenge, but felt on balance, it was better for this proposal to be shared transparently with you now, rather than wait until schools are fully able to return, particularly as it is not clear when that might be.

Thank you for taking the time to consider our proposal, we look forward to hearing your views.

Mark Campbell

Shapla School Chair of Governors

Proposal to close Shapla School – Response Form

Our proposal is to close Shapla School, from Sept 1 st 2021, and ensure all children are found places at strong schools within a mile of their homes. We welcome your views on this proposal. Please fill in this response form and return it to the address below no later than July 17th 2020, 3.30pm.

- 1) Do you accept the proposal that it is necessary to close Shapla School, and relocate children to nearby schools?

Please tick as applicable

Yes		No	
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- 2) If you accept the proposal, please let us know what we can do to help minimise the disruption for children and families.

- 3) If you do not accept the proposal, please tell us why.

- 4) Any other comments?

If you would like someone to ring you to discuss your views, please let the school know and provide your name and phone number. You can book through the school if you would like to attend any off the virtual or 1 to 1 meetings.

Please let us know whether you are

Parent		Staff		Governor		Other (please specify)	
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(Children are being asked to respond in age appropriate ways.)

Your Name (Optional) _____

Please return this form to Shapla School by 17th July 2020. Feedback from question one will be summarised numerically. Comments will be typed-up and anonymised. This information will be made available to the public (via the school website), but all respondents' comments and information will be anonymised.

School Roll projections for Reception

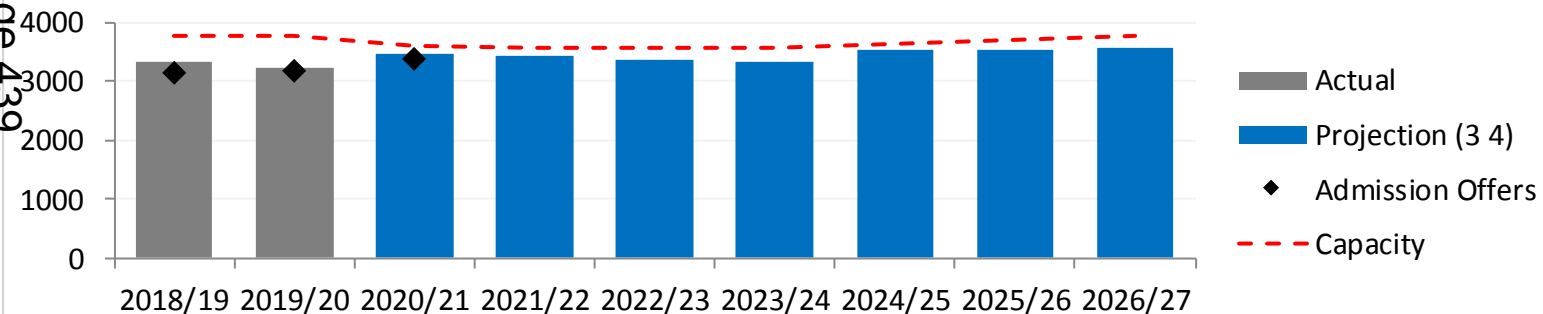
Produced June 20 using: Jan 2020 school rolls, GLA 2018-based population projection model (UPC), and Local Plan + LLDC development trajectory, High Migration 3 4 option, January 2020 Capacity

West of the Borough

	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	
Actual	1,523	-	-	-	-	-	-	-	
Projection (3 4)	-	1,691	1,650	1,604	1,596	1,675	1,659	1,650	
Admission Offers	1,540	1,590	-	-	-	-	-	-	
Capacity	1,970	1,815	1,800	1,770	1,770	1,800	1,800	1,800	
Variance (3 4)	Pupils	447	124	150	166	174	125	141	150
	FE	14.9	4.1	5.0	5.5	5.8	4.2	4.7	5.0
	%	23%	7%	8%	9%	10%	7%	8%	8%

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Reception projections: West of the Borough



Catchment 1 - Stepney			(INCLUDES BOTH BONNER SITES)						
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
Actual	730	600							
Projection			734	702	682	692	723	711	704
Admission Offers	727	630	644						
Capacity	840	840	720	720	720	720	750	750	750
Variance									
Pupils	110	240	- 14	18	38	28	27	39	46
FE	3.7	8.0	- 0.5	0.6	1.3	0.9	0.9	1.3	1.5
%	13%	29%	-2%	3%	5%	4%	4%	5%	6%

Catchment 5 - Wapping									
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
Actual	418	417							
Projection			432	437	427	412	435	435	434
Admission Offers	419	409	440						
Capacity	480	480	465	450	450	450	450	450	450
Variance									
Pupils	62	63	33	13	23	38	15	15	16
FE	2.1	2.1	1.1	0.4	0.8	1.3	0.5	0.5	0.5
%	13%	13%	7%	3%	5%	8%	3%	3%	4%

Catchment 6 - Bethnal Green									
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
Actual	508	506							
Projection			525	511	495	492	517	513	512
Admission Offers	483	501	506						
Capacity	660	650	630	630	600	600	600	600	600
Variance									
Pupils	152	144	105	119	105	108	83	87	88
FE	5.1	4.8	3.5	4.0	3.5	3.6	2.8	2.9	2.9
%	23%	22%	17%	19%	18%	18%	14%	15%	15%

Summary of the School Roll Projection Methodology

Tower Hamlets Council commissions school roll projections through the Greater London Authority (GLA), like most other London boroughs. GLA have access to data on all pupils in London (via the National Pupil Database) which enables them to model movements across borough boundaries in a way that would be difficult for an individual authority.

Projections are run each year in March/April using the following methodology:

- Step 1.** The borough's population is projected based on demographic trends (e.g. births, deaths, and migration) and the borough's housing development trajectory using planning data submitted by the council.
- Step 2.** The flow of pupils from their ward of residence (including those out of borough) to each mainstream state school is determined, based on the Spring School Census and estimates of the number of children living in each ward. These are turned into ratios, for example, one in five Year 1 pupils living in XYZ Ward go to ABC Primary School. These existing ratios are not available for new children entering school in Reception, so these ratios are determined based on previous years.
- Step 3.** The number of pupils in each school is projected by multiplying the flow ratios by the populations in each ward. For example, if one in five Year 1 pupils in XYZ Ward go to ABC Primary School, and it is projected that there will be 100 Year 1 pupils in the ward, then 20 pupils from this ward are expected to go to ABC Primary. The number of pupils from each ward is then added up for each school.
- Step 4.** Projections are aggregated to catchment area and borough-level to improve reliability.
- Step 5.** Validation of pupil numbers and local intelligence checks are made against GLA projections.

Projections are run each year in March/April using information based on demographic trends (e.g. births, deaths, and migration); the borough's housing development trajectory; and the flow of pupils from their ward of residence (including those out of borough) to each school.

PAN London pupil projections are notoriously difficult to plan, given the growth experienced in recent years and all the factors contributing to current migration levels. The council uses six sets of pupil projections based on high, medium and low migration; and on a one year or four year historical reference. Historically, it considered the medium migration sets as the most reliable method as it produced a higher yield of pupil place projections consistent with the growth pattern at that time. However, recently, it was decided to change to a new model based on the high migration set, which has produced a more modest pupil growth projections in line with current trends. The council's most recent DfE return on School Capacity (SCAP) showed projections were 99.7% accurate for primary and 99.1% for secondary. This is well within the DfE's tolerances and therefore ensures confidence in the methodology and approach.

Within the Pan London context, Tower Hamlets is especially complex as it is a population dense urban area with rapidly changing demographics and huge scale development, which increases the degrees of variability to its pupil projections work. The approach is therefore to develop and present a school place planning strategy with reasonable ambition, the necessary caution and flexibility to manage these significant challenges, as well as the expectations of the various stakeholders.

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Shapla Primary School – Current Financial Position as of January 2021

Introduction.

1. School funding is allocated on a formula basis known as the National Funding Formula (NFF).
2. The majority of funding that goes through the schools NFF is 'pupil-led'. This funding is calculated based on the number of pupils in the school and their characteristics. All schools get a basic amount for each pupil (with different amounts for different ages), and extra funding for pupils with additional needs.
3. Schools also receive 'school-led' funding, based on the characteristics of the school itself. This includes a lump sum for every school, and extra funding for schools with certain characteristics, such as a school that operates across more than one site, or a school that is small and remote.
4. Absolute levels of funding per pupil are calculated using both pupil-led and school-led funding - the total funding for both pupils and the school.
5. Changes in funding per pupil are calculated using changes in pupil-led funding only - the funding that changes from year to year with pupil numbers.

School Budget Share.

6. The School Budget Share is the primary source of funding for Shapla, covering all pupils in reception to Year 6. It is predominantly pupil led; in 2020-21 the budget share was £1,502,478 of which £1,480,539 (98.5%) was pupil led. Changes in pupil numbers therefore have a significant impact on the funding available.
7. Recent changes in the budget share are set out in the following table.

Financial Year	Budget Share (Exc Capital)	Pupil Led	Pupil Numbers Years R-6 ⁽¹⁾
2020-21	1,502,478	1,480,539	154
2019-20	1,574,310	1,561,962	157
2018-19	1,488,353	1,462,706	174
2017-18	1,664,942	1,651,441	179
2016-17	1,762,981	1,750,366	195

(1) October census preceding the financial year.

8. The projected roll of 154 (years R to 6) for September 2021 indicates a school budget share of £1,327,234 for 2021-22. This would fall significantly in future years as larger year groups leave the school and if the fall in applications is not reversed.
9. The Tower Hamlets average budget share for a maintained primary school (excluding Shapla) is £1,961k in a range from £859k to £3,654k. If Shapla had full cohorts in years R to 6 at its planned admissions number its budget share would be £1,735,113.
10. In addition to the budget share the school receives early years funding (£68,825), various grants and other contributions; the majority of these funding sources are determined by pupil numbers and will fall as the roll decreases. Total income for preceding years is shown in the next table.

Financial Position – Prior Years.

11. The difference between the school's income and expenditure is set out in the following table.

	Income ⁽¹⁾	Expenditure	Net ⁽²⁾	Cumulative ⁽²⁾
	£000	£000	£000	£000
2019-20	1,581,355	1,730,079	(148,724)	(423,069)
2018-19	1,488,353	1,640,459	(152,016)	(274,345)
2017-18	1,664,942	1,781,571	(116,629)	(122,239)

(1) Excludes LA advance of 100k in 2019/20

(2) Figures in brackets represent a deficit.

12. The in-year deficit in 2019/20 was £148,724. Regulations prevent a Local Authority (LA) from writing off school deficits so in-year balances are added to those brought forward from previous years giving a cumulative budget deficit at 1 April 2020 of £423,069.

Financial Position - Future Years.

13. The Scheme for Financing Schools requires the governing body reduce the in-year expenditure so as not to exceed in-year income; in addition, further reductions are required so as to eliminate the cumulative deficit over no more than three years. This would indicate a year on year reduction in expenditure in the region of £167 (on a straight line recovery of the cumulative deficit).
14. The school has produced a financial projection covering the financial years to 2023-24. The projected in-year deficit for 2020-21 is £81,271, but projected deficits increase year on year to reach an *in-year* deficit of £852,770 by 2023-24.

Shapla - BP	20/21	21/22	22/23	23/24
Opening Balance	-423,069	-385,348	-524,336	-679,939
In year Surplus/Deficit	37,721	-138,988	-155,603	-172,831
Cumulative YE Bal	-385,348	-524,336	-679,939	-852,770

Previous LA Financial Support.

15. To enable the school to function, the LA has made loans totalling £300K to the end of Sep 2020
16. The Tower Hamlets Scheme for Financing Schools in force at the time of the advances allowed the LA to make loans to schools with Licensed Deficits¹. Documentation indicates that loan repayments were scheduled to be:
 - 2019-20 £100K
 - 2020-21 £200K
17. A directed revision to schemes by the Secretary of State on 22 March 2018 removed the ability to make loans to schools with Licensed Deficits. The revision does not prevent cash advances being made to prevent overdrafts but does limit the period of a Licensed Deficit to three years.

Licensed Deficit Agreement.

18. A new Licensed Deficit Agreement is required with the governing body within the limits imposed by the Secretary of State and taking account of the likely future of the school. Careful monitoring of the action plan will be needed in order to safeguard the LA's financial position. If a decision is taken to close the school the action plan and monitoring arrangements will be an important element in controlling the final deficit to be met by Tower Hamlets' General Fund.

¹ A Licensed Deficit is an agreement between the LA and a governing body that allows a school to set a deficit budget. It should only be allowed when the governing body can demonstrate, through an action plan, that it can bring in-year income and expenditure into balance **and** eliminate the cumulative deficit brought forward. National regulations now limit a permitted deficit to a maximum of three years.

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Shapla School Public Consultation (1st Stage) Feedback Report - July 28th 2020

Report compiled by Dr Helen Jenner, Independent Consultant, Tower Hamlets Primary Review.

Introduction

This report summarises the planning undertaken to lead to a public consultation, and the responses to that consultation, on whether or not Shapla School governing body should support the Local Authority to formally consult on the closure of Shapla School. The report aims to support the governors' steering group to reach an informed decision at their meeting in September 2020.

Background

Shapla School Governing Body was prompted by the Tower Hamlets Primary Review¹ to consider the sustainability of Shapla Primary School, given its vulnerability to falling rolls, and reluctantly reached the conclusion that to close the school and relocate children to other nearby schools may be the best solution to optimising educational provision in the area.

The Tower Hamlets Primary Review commissioned an Independent Consultant, Dr Helen Jenner, to work with schools they had identified as being at risk due to demographic change in the Borough. As well as working with the schools, Dr Jenner was asked to produce a public report "Future Ambitions"² setting out principles for developing school relationships for resilience and excellence. This document was shared with all Headteachers, Unions and Governors in March 2019. Regular updates on the Primary Review have been included in the termly Director's Report for Governors.

Governors Planning

A Steering Group consisting of the Chair, staff governor, parent governor and Headteacher from Shapla, supported by the Independent Consultant has led the work on considering the implications of the review for Shapla .

Governors and the Headteacher have met, in various groupings, regularly since the Local Authority first identified the school as being "in scope" for review, in July 2018.

An Informal Governing Body meeting with governors was held on 10th Feb to discuss the Primary Review, the Future Ambitions Report, and the best responses for the school. This Informal meeting recognised the likelihood of a proposal to close Shapla school. The

¹ Tower Hamlets Primary Review

https://www.towerhamlets.gov.uk/lgnl/education_and_learning/schools/Primary_Review_or_parents.aspx

² The Future Ambitions Report is available on the Tower Hamlets Primary Review Website.

Governing Body met again, virtually, on March 25th to consider and agree arrangements for informal consultation.

Local Headteachers met , virtually, on 20th March to consider the possible proposal. This same group, and a wider group of Headteachers whose schools might be affected met again on 19th June.

A consultation document³ was prepared, and agreed with the Local Authority. This was given in paper copy to all parents, circulated to Tower Hamlets Headteachers, through the Headteacher's Bulletin; emailed to staffing unions, and the Secretary of State has been notified of potential changes.

Information about the consultation was also placed on the school website.

<https://shapla.school/consultation/>

This includes a letter to parents and staff from the Chair of Governors, a copy of the consultation document, and 3 short videos explaining the situation.

Because of coronavirus open meetings were not held, however, a range of ways to feed into the consultation were organized:

The following opportunities were organised for staff, parents and carers to share views.

1. A response form (or any other written format) at the end of the consultation document to record views to be emailed, posted or handed to the school.
2. A special email address was set up for comments

consult@shapla.school

3. A box was set up in the playground at Shapla School where people could leave comments, response forms, and any questions.
4. The Local Authority consultant was available for 1 to1 socially distanced questions/feedback on Monday 13th July from 10.15 – 2.30.
5. Virtual meetings were set up on July 13th:

Staff 4pm

Parents 9am (this did not go ahead as there was no demand) and 6pm
5. Personal phone calls were offered.

Governors agreed responses from the different forms of consultation should be summarized in a report for Governors, to be sent to the Steering Group, by the end of July 2020, following which recommendations would be made to the Shapla Governing Body as to

³ Included in Appendix "Supporting Documents"

whether they should support the Local Authority's proposal to move to Statutory Consultation.

Consultation Response

Written Responses

14 written responses and 1 email response were received. All of which showed that parents feel their children have been well supported by the school. They are sad that there is a consultation regarding the closure of the school.

6 parental responses and 1 governor response said they did accept the proposal.
8 parental responses said they did not. One of these 8 commented that they did understand the reasons for the proposal.

Comments recorded on the forms included:

- Love the school (3)
- Children are happy and settled (3)
- We like the low numbers (2)
- The school is close to home (2)
- We don't think our children will like the disruption (4)
- We need support for transition, particularly SEN and keeping siblings together (5)
- Couldn't we pair with another school

2 emails were received – one returning a response form (included in the information above) and the other requesting to join the zoom meeting.

Zoom and 121 meetings

Headteachers Meeting - 12 Headteachers, 2 Tower Hamlets Partnership officers, 2 Local Authority officers and the Independent Consultant. 19th June.

Parents Meeting – Chair of Governors, Headteacher, Independent Consultant and 15 parents. July 13th.

Staff – 5 members of staff met 1-2-1 with Independent Consultant. July 13th.
Tower Hamlets NEU Rep telephone conversation with Independent Consultant. July 20th.
Tower Hamlets Unions Briefing 27th March
Staff zoom meeting.

The following points were raised:

- Is this process happening too quickly?
- Is a consultation during Coronavirus appropriate?
- Was amalgamation with another school considered?
- Have all funding avenues been explored?
- Will there be enough places for children?
- How can we be guaranteed places at our first choice of replacement school?
- Staff are not clear what options will be open to them when
- Will staff have to be redeployed
- What are the redundancy and redeployment options?

- Will staff be able to access training next year?
- How should schools respond if parents approach them directly for places?

Verbal responses were given to all the questions raised.

Feedback to stakeholders

It is recommended that this Consultation Summary and the Frequently Asked Questions document (attached) be posted on the school website and be emailed to parents, staff and other stakeholders.

In consultation with the NEU, and circulated to other unions a guide to HR processes for staff has been provided, explaining what will happen when over the next year. This was sent to staff at the end of the Summer Term.

The Headteachers from other schools have requested an update via Zoom meeting in September. This will be set up for September 10th 2pm.

Governing Body next steps

Shapla governing body will meet in September to consider this feedback report and whether they are recommending that the Local Authority move to publish statutory notices. A decision will be made regarding the proposal at the Council Cabinet meeting in October 2020.

View of the independent consultant

Whilst parents, staff, pupils and parents appreciate their school they recognise that numbers have fallen and understood why this proposal is being made. Many are resigned to the likelihood of closure, and several parents have moved to find alternative places at neighbouring schools.

The majority of parents and all of the staff and governors are completely committed to a final year together to celebrate the contribution Shapla School has made to education and the community, whatever decision is reached in March 2021.

The reflective responses from parents and commitment of staff and governors should be commended.

Appendix 7

Analysis of the Responses to the Statutory (Public) Notice on the Proposal to close Shapla Primary School

(Published from the 16th November – 16th December 2020)

Stakeholders Consulted

London Borough of Tower Hamlets (LBTH) consulted the following stakeholders and interested parties directly to inform them of the publication of this statutory proposal:

- ✓ Secretary of State
- ✓ Parents, Carers and Pupils of Shapla Primary School
- ✓ Staff at Shapla Primary School
- ✓ Diocese of Westminster (Roman Catholic)
- ✓ London Diocesan Board for Schools
- ✓ LBTH Admissions Forum
- ✓ Children and Young Peoples Voluntary Sector Forum
- ✓ Headteachers of all LBTH schools
- ✓ Local MPs
- ✓ All LBTH councillors
- ✓ All neighbouring boroughs local authorities
- ✓ Parents Carers Forum
- ✓ Parent Champions
- ✓ Young People Forum
- ✓ Somali Community Association
- ✓ Collective of Bangladeshi Governors
- ✓ East London NEU
- ✓ Council of Mosques
- ✓ Published on LBTH website / social media accounts
- ✓ East London Advertiser
- ✓ General Public

Responses

By the close of the statutory notice representation period, the following written responses were received:

Total number of responses	Agree with proposal	Do not agree with proposal
3	1	2

Respondents identified themselves as:

- Parents of Shapla pupil
- Local Resident
- Local Headteacher

Within the three written responses received, there were 11 issues raised, within four broad themes:

1. Reason for amalgamation

- It is difficult to argue with the case for closing the school, given its falling pupil numbers in an area of Tower Hamlets where the number of new pupils is not set to rise for several years. Nevertheless, I am disappointed at the local

authority's decision to disperse the Shapla children in September 2021 and feel that this decision was made without due regard for alternative courses of action.

Shapla School has a dedicated community and a distinctive ethos that has endured for many years. It is my firm belief that the best location for the Shapla pupils is Shapla school, and the children should remain in this setting for as long as possible. The decision to disperse these children in September 2021 seems to be a purely financial decision that does not consider the social and emotional cost to the wellbeing of the Shapla community.

LBTH Response

Thank you for your view of the need to close Shapla School but raising concern regarding timescales and exploration of different courses of action. It is good to know that neighbouring schools have the concerns of the local Shapla community at heart.

The Local Authority has been working with Shapla School to consider future options since early Summer 2018, and was also closely involved with the school from 2015 to 2017, during a period when the outstanding provision (OFSTED judgement 2006) had unfortunately shifted to Requires Improvement. Considerable improvements were made and the school returned to Good, late in 2017.

The new Headteacher took up his role with enthusiasm, and governors, supported by an independent consultant employed by the Local Authority, explored a wide range of options. These ranged from considering becoming part of a Multi-Academy Trust, to establishing a bilingual Spanish school and included hard federation, amalgamation or closure. A number of these options were explored in meetings facilitated by the independent consultant that included neighbouring Headteachers.

The Shapla Governors and the Local Authority had to weighed up these alternatives over several meetings, including an analysis of all options. However, they concluded that only feasible option would be to consult on closure.

2. Pupil Numbers and admissions

- Will there be enough places for children, including family groups?

Consultation document response:

The LA analysis shows that there are sufficient places, based on pupil's home addresses for all children to be accommodated within 0.7 mile from their homes (0.6 mile from Shapla).

In the consultation document, the local authority seem confident that there are enough places in surrounding schools. There are two problems with this. Firstly, the data on pupil places in surrounding schools was collected a year ago. A number of pupils have been admitted to local schools since those figures were produced. Therefore, there is a strong possibility that this assertion is no longer reliable. It is incumbent on the local authority to provide more accurate data, before this decision is made. Secondly, I do not believe that those figures adequately take account of family groups within the Shapla community. The number of spare places in local schools, as calculated at the time, correlated very closely with the number of pupils in Shapla School. Even if the figures are still correct, there is very little wriggle-room to enable family groups to be moved to the same local school.

LBTH Response

A detailed analysis of available local places (using Summer Term 2020 data, the very latest data available) showed that there would be sufficient places in local schools (within 0.6 of a mile) of Shapla, for families to attend. It took into account the particular need to ensure that children within the same family group would not be disadvantaged. This exercise was repeated in January 2021.

It is apparent that no single school site would be able to accommodate all the Shapla pupils (Hermitage School, if it became a 2 form entry, would have the greatest space capacity to do so).

The Local Authority and Shapla Governors do not feel that a phased closure would be beneficial to the children's wellbeing over time, nor that it would be straightforward to sustain high quality education. The view was that children should be offered the opportunity of a really exciting final year at Shapla with strong support to transition to the communities of their local schools.

3. Impact on the community

- I would like to say how sad I feel about the school closing, I really feel like it is an amazing school and my children have received excellent care and an excellent education here. The staff are lovely and kind and have a warmth which is lacking in many schools.
- I hope that our children are looked after well during this transition. And not an afterthought in their new schools.
- I don't agree to the closure of Shapla Primary School. It has been at the heart of the local area as we were growing up. I have always been a Tower Hamlets resident and have seen how corporate the area has slowly become.

LBTH Response

The Local Authority is acutely aware that the process and decision for school closure is difficult and disappointing for all. This proposal is in no way connected to standards or a lacking in pastoral care. Shapla's standing as a School in the community is recognised as being strong and well regarded.

However, the decline in pupil numbers, alongside the financial challenges, now means Shapla is no longer sustainable. This situation has reached the stage where the school does not have the necessary resources to invest in a recovery and improvement plan, so the consideration of its closure is necessary.

The transitioning of the children into new schools will be carefully planned with particular attention paid to the most vulnerable and or those with special educational needs.

- I am very sad you are planning to close this school. This will affect a lot of local residents. People who happily sent their kids to Shapla will now be forced to uproot and send them elsewhere. It is a lovely school and focuses a lot on the pupils. I am concerned that by closing this school, this will just be a ploy to bring up statistics, without caring for individual pupil's needs. Is there not another option, perhaps maybe merge with another school, or try to secure more funding?

LBTH Response

The decline in pupil numbers, alongside the financial challenges, now means Shapla is no longer sustainable. This situation has reached the stage where the school does not have the necessary resources to invest in a recovery and improvement plan. The financial challenges at Shapla means that it would require significant and sustained investment over a number of years. This is not possible given the central government changes to how local authorities can fund schools with financial deficits.

Shapla Governors and the Local Authority had to weigh up a number of alternatives before coming to a decision on the way forward. This was reached over several meetings and following a thorough analysis of different options. These alternatives were explored in meetings facilitated by an independent consultant with options ranging from considering becoming part of a Multi-Academy Trust, to establishing a bilingual Spanish school. They also included hard federation, amalgamation and the proposal for school closure.

- I object to these plans, as I am sure you will find not only does it affect residents like us, it affects parents' and their future choices. It affects the community, but most importantly it affects the pupils. At the same time, I'm sure you will find it also affects the teachers although they may not publicly object to this huge change. I do hope you will reconsider these plans, is these changes are implemented it will inconvenience and affect a whole community.

LBTH Response

Changes in provision of education is always contentious, especially when closure is proposed. Consultation at an early stage with both staff, pupils and parents has been carried out, and views listened to. The Local Authority has considered carefully transition plans for children and staff to ensure that should the school close, there will be clear and comprehensive processes in place to facilitate ease of transfer to new provisions.

- Dispersal of the current pupils will deposit many children into unfamiliar settings amongst children and staff with whom they are unaccustomed. It will split friendship groups built up over several years; it may even split families. Children with SEND or SEMH may find it particularly difficult to settle so that it affects their cognitive and social development. The feelings of alienation and uncertainty they experience will come at a time when the school community is likely still to be recovering from the disruption wrought by coronavirus.

My preferred option would be that an amalgamation with St Paul's School be considered for a period of, say, three years. There would be no further intake at Shapla School from September 2021, as per the consultation proposal. Children in current years 3, 4 and 5 would be allowed to complete their education as distinct Shapla pupils (in years 4, 5 and 6 respectively). Children in years below year 3 would be assimilated into St Paul's School, or other local schools, if their parents/ carers desire, as places become available.

- Shapla is a good school, surely the closure could take place over several years rather than 1 year?

Consultation document response:

Experience has shown that once consultation starts staff, parents and children start to consider their future. We know that being part of a declining school with children and staff leaving each term is not a positive experience.

I am not convinced that this would hold true, instead parents and carers could take confidence in the knowledge that their children's future is secure for the next three years.

A preferable strategy might have been a tapered closure, with no new admissions from September 2021, but with the school kept open whilst the current cohorts saw out their time. I believe that John Musgrave-Bolanos, Shapla's Headteacher, and Mark Campbell, Chair of Governors, discussed this with the LA. The idea was certainly mooted by Helen Jenner in a meeting back in October 2019, with the thought that Harry Gosling School might consider an arrangement, such as an amalgamation, with Shapla School in order to facilitate a more nuanced solution. I made it clear, in that meeting, that St Paul's School would be happy to step in, if Harry Gosling School was unable to help.

- Could St Paul's School look after Shapla?

Consultation document response:

Although St Paul's is right next door and would be willing to help this would not solve the problem of the costs of running a building and having too few children in each class.

On 6th November 2019, Darren Rubin, our Executive Head of Schools, and I were invited to a meeting with Christine McInnes and Terry Bryan, where we were asked to consider an amalgamation between St Paul's and Shapla Schools. We said we were interested but would like to have the LA's proposal set out in writing with roll predictions and financial information. Terry Bryan, Head of Pupil Services, promised to provide that information in 'a couple of weeks'. That information was not forthcoming, so it is difficult to gauge the basis of the financial underpinning of the local authority's preferred solution, and whether the governors of St Paul's School (part of a federation with St John's, Bethnal Green) could pursue the proposal.

Because the local authority has not shared its financial projections it is difficult to comment directly about the costs, however amalgamation would enable the reduction in running costs associated with keeping Shapla School open as a stand-alone school. For example, the administrative and premises staff functions could be integrated and areas of the building not in use could be 'mothballed'. It may be possible to absorb some of the costs of the smaller classes by combining these across the schools.

LBTH Response

The Shapla Governing Body and the Local Authority was in agreement that, if the School were to close, it would be in the children's best interests for it to be within a reasonable timescale; and not drawn out over a number of years.

The option of links to other local schools, through amalgamation and or hard/soft federation with a closure over time was explored in meetings with Shapla governors, the LDBS and with the local headteachers. Existing partnerships were also considered - Harry Gosling School is already in a partnership with Stephen Hawking School, and St Paul's is in a partnership with St John's School. In all cases the leadership, and responsibility for the school must rest with a single Headteacher and governing body. This would have meant a partner school Headteacher and governors picking up accountability for financial management and the quality of education at Shapla School.

Unfortunately, the financial position at Shapla has deteriorated over several years. The last year that the school had a positive in year balance was in 2014/5. The school moved into deficit in 2016/7 and the position has worsened since then. In

order to maintain single year groups, to secure educational excellence, costs per pupil have escalated and by 2018/9 were close to £10,000 per pupil (£9882 in 2018/19). Whilst finances are not the only consideration for the Local Authority and governing body it must demonstrate reasonable use of public money. The costs of sustaining quality provision at the Shapla site have become prohibitive. The Local Authority view is that the risk of a single school partnering to take on the financial and educational responsibility for Shapla closing gradually was too much of a risk to ask governors to consider.

The Local Authority has to consider a range of factors in reaching a decision about whether to close a school. These include choice and balance of denominational provision. Many of the parents who chose Shapla School would have had the option of choosing St Paul's School when they applied to start school in reception. Some of those parents may prefer that their children did not attend a faith school and would therefore prefer a community school. The group of schools working together to support children to transition to several local schools was viewed by the Local Authority and governors as giving more options to families, rather than reducing their choice of community to a single school.

The Local Authority is pleased that St Paul's and other local schools, are offering to support the Shapla Community and it welcomes the concern to ensure as smooth a transition as possible. We hope that this response explains why St Paul's and other schools were not, in the end, asked to consider a partnership proposal formally. The Local Authority believes that, through joint working, a smooth transition to excellent new schools and communities is a real possibility for the Shapla children. Otherwise sustaining quality education for a small number of children in the current situation would be a significant challenge.

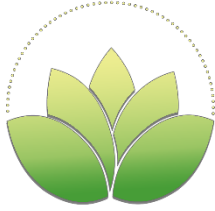
The Local Authority will work with local headteachers to ensure that risks around transition are carefully considered and mitigated through joint planning and partnership working.

4. Other

- I wish this was not all happening during this pandemic, I feel us parents would have been a lot more active in protests and petitions early on if it was possible to do so. But I understand the reason why it is happening.

LBTH Response

It is unfortunate that the consultation has been within the pandemic, however, the LA has carried out a range of alternative methods to fully engage with Shapla community including playground meetings, video presentations, virtual meetings and one to one meetings with parents and staff.



SHAPLA PRIMARY SCHOOL

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25th January 2020

Letter re consultation

To: Christine McInnes

Cc Terry Bryan, Ikwi Mkparu, Helen Jenner, John Musgrave Bolanos

Dear Christine

Proposed Closure of Shapla Primary School

I am writing at the request of Helen Jenner to inform you of feedback from the Governors in connection with the summary responses to the formal consultation which she has shared with us.

The School Closure Steering Committee of Governors of Shapla Primary School has considered carefully and discussed the responses to the Statutory Notice on the proposal to close the school. We are very grateful to all those who replied to the consultation.

While we very much agree with the comments made about the strength of the school's offering both in terms of education and care for our pupils and their families, we remain of the view that the best course of action, given falling rolls in our part of the Borough and the associated financial implications, is to proceed to a closure of the school at the end of the 2021 summer term. We have considered a range of other options, but do not consider any to be viable.

It is, of course, particularly difficult for this process to take place during a pandemic and we recognise the problems that this has caused. However, we believe that the school and local authority have done their very best to ensure that all stakeholders have been given an opportunity to be involved in the consultation procedures.

We are committed to ensuring that all pupils and families are supported during the transition period. In particular, we would welcome being given more clarity on the position within the admissions procedure of children with Education Health and Care Plans (EHCPs) and of children who are currently being considered for EHCPs (and their siblings). We feel that consideration should be given to prioritising those children within the admissions procedure.

Yours Sincerely

Mark Campbell

Chair of Governors
Shapla Primary School

Conclusion


Through analysis of the feedback received during the informal consultation and the statutory consultation period, the Council is able to draw some clear recognition that Shapla School is held in high regard within its community. An alternative proposal was put forward during the consultation period, but subsequent financial modelling and pupil projection analysis determined that this alternative was not viable.

The fall in pupil rolls is the main driver in the need to reduce surplus school places in the west of the borough. The first aim to remove the surplus places at Shapla could not be achieved without seriously impacting on the quality of education. It was therefore necessary to consider the closure of the entire School.

The new financial regulations and diminishing budgets has reduced the flexibility of the LA to support schools in challenging financial positions. Resulting in these schools accruing significant budget deficits, which must be met through the Council's General Fund and thus impacting on the council's provision of services and all schools in the borough

This proposal will therefore remove some of the existing surplus and ensure a more efficient use of resources. It will enable the displaced Shapla pupils to continue to access high quality, sustainable provision in alternative school settings in the local area.

DRAFT

<p>Cabinet</p> <p>3 March 2021</p>	
<p>Report of: James Thomas, Corporate Director, Children and Culture</p>	<p>Classification: Unrestricted</p>
<p>Report on the outcome of the statutory consultation on the proposal to close St Matthias CE Primary School</p>	

Lead Member	Councillor Asma Begum, Deputy Mayor for Children, Youth Services and Education
Originating Officer(s)	Terry Bryan, Service Head (Pupil Services and School Sufficiency) Ikwi Mkpuru, School Organisation and Place Planning Manager
Wards affected	All wards
Key Decision?	Yes
Forward Plan Notice Published	3rd December 2021
Reason for Key Decision	To be 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.
Strategic Plan Priority / Outcome	Children and young people are protected so they get the best start in life and can realise their potential

Executive Summary

This report informs cabinet of the outcome of the four week period of public representation in response to the statutory notice on the proposal to close St Matthias Church of England (CE) Primary School. It recommends for the Mayor in cabinet to consider a decision on whether or not to formally proceed with plans for the School to close on the 31st August 2021. The report includes: a summary of representations received; the council's response; officer's recommendations; and the decisions available to the Mayor in Cabinet.

RECOMMENDATION:

1. Having considered the responses to statutory (public) notice at Appendix 1, the Equalities Assessment at Appendix 2 and the alternative options explored in the earlier public consultation report, it is recommended that the cabinet approves the proposal to close St Matthias CE Primary School with effect from the 31st August 2021.

1. REASONS FOR THE RECOMMENDATION

- 1.1 The recommendation is made in order to determine the council's response to representations received following the statutory notice.
- 1.2 Prior to the earlier stage one consultation, which was then followed by the issuing of the statutory notice, alternatives were explored to support a sustainable future for St Matthias CE Primary School. These were considered in detail with both the London Diocesan Board for Schools (LDBS) and the School's Governing Body. However, upon further analysis none of these alternatives were considered viable. The alternatives together with explanations of why they could not be pursued are considered in this report and its appendices.

2. ALTERNATIVE DECISIONS

- 2.1 The Mayor could decide not to agree to the recommendation for St Matthias CE Primary School to close. In which case the council would then have to decide on how the School's increasing budget deficit would be funded beyond the 2020/21 school year, given that it is no longer financially viable and will not see a sufficient increase in its pupil numbers for the situation to change in the foreseeable future.
- 2.2 The Mayor could decide to delay the decision on the School's closure until later years. However, this would mean that the School's financial position would worsen, further impacting on the quality of education for its current pupils and leaving an even bigger budget deficit. It would then not be possible for St Matthias to provide pupils with a rounded education that meets their academic, social and emotional needs. Consequently, any delay would not be in the best interests of educational provision in the area.

3. DETAILS OF THE REPORT

- 3.1 The report informs cabinet of the responses to the statutory notice.
- 3.2 The Mayor in cabinet is asked to consider these responses alongside the Equalities Assessment, before taking a decision on whether the council should proceed with the St Matthias closure on the 31st August 2021.

4. INTRODUCTION

- 4.1 Following a report to cabinet on 21st October 2020, the Mayor agreed for the council to proceed with the issuing of a statutory notice on the proposal to close St Matthias CE Primary School. The main facts on the background to this decision, and current position of St Matthias, are set out below, with the detailed information in the earlier public consultation paper (Appendix 3) and the October cabinet report.

5. **BACKGROUND**

- 5.1 St Matthias CE Primary School is a one form entry Church of England School for up to 210 pupils with additional nursery provision. The school comes under the auspices of the London Diocesan Board for Schools (LDBS). It is located at Bacon St, London, E2 6DY, in the Bethnal Green catchment area to the West of the Borough. The school has the capacity to take up to 30 pupils at the point of entry in reception. For the last few years, St Matthias has experienced low numbers of reception applications and the School's total roll has therefore reduced over time.
- 5.2 Schools receive funding per pupil and lower pupil numbers can create financial difficulties and present significant challenges with school organisation and the delivery of a high quality curriculum.
- 5.3 The table below presents the numbers of reception offers for St Matthias over the past five years. It shows that the number of offers has remained low and well below the School's Planned Admission Number. This has resulted in high percentages of unfilled places and a significant decline in the St Matthias pupil roll.

Year	Reception Offers	Planned Admission Number	% of Surplus Places
2016	16	30	47
2017	15	30	50
2018	14	30	54
2019	7	30	77
2020	14	30	54

- 5.4 The decline in the pupil roll at St Matthias is largely due to the population changes, where pupil numbers in Tower Hamlets are currently falling in the west of the borough. This now means that St Matthias School, along with some other schools, does not have sufficient children to fill its classes. Most year groups are currently operating at well below their planned capacity of 30.
- 5.5 The advice from central government is for Local Authorities to aim to have no more than 10% of surplus places across the whole area and for purposeful action to be taken in individual schools with more than 25% of unfilled places.

6. **REASON FOR THE RECOMMENDATION FOR ST MATTHIAS SCHOOL TO CLOSE**

- 6.1 The significant fall in pupil numbers and the associated impact on the educational and financial viability of the School has led to this recommendation for closure. These underlying viability issues are the result of a growing and unrecoverable budget deficit, very low pupil numbers and reception year admission patterns that have been consistently low for a period of five years.
- 6.2 An analysis of the current financial position of St Matthias School is provided as Appendix 4. The School ended the previous financial year (2019/20) with a small surplus of 47k. However, its budget forecast for 2020/21 is an in-year deficit of 86k. Government regulations prevent a Local Authority (LA) from writing off school deficits so in-year balances must be added to those brought forward from previous years, giving a cumulative budget deficit at 1 April 2021 of 38k. This budget deficit is projected to increase year on year and reach a total of 516k by 2023-24.

- 6.3 In accordance with school funding regulations, a school's budget deficit must be repaid within a three-year timeframe. Where a deficit cannot be repaid it is incumbent upon the School and the Local Authority to consider options for the School's future viability, including school closure. The funding regulations also state that a deficit balance following a school closure will be the responsibility of the local authority.
- 6.4 The current pupil projections for the west of the borough are attached as Appendix 5. In terms of demographic growth, pupil projections show that there is no material increase in the projected numbers of primary pupils within the areas west of the borough. Based upon the data for the Bethnal Green area, the numbers of pupils starting primary schools in Bethnal Green is unlikely to increase in the near future. This indicates that there is no real prospect of recovery for the St Matthias School roll over the next few years.
- 6.5 The reasoning for the closure of St Matthias Primary School is therefore evidenced by:
- its falling pupil roll;
 - a budget deficit that will increase and the substantial risk to the continued provision of efficient high quality education;
 - pupil projections that indicate there is unlikely to be an increase in demand for places at the School in the medium to long term; and
 - the surplus places elsewhere in the local area, which can accommodate the displaced pupils.
- 6.6 Full consideration has been given to the wellbeing of the school community, including pupils, families and staff, and the support they will require if the recommendation for closure is approved. The need to ensure sustainable high quality education has been the primary consideration and provisional arrangements are already in place for pupils and their families. The impacts and risks are explored in this report and in the equalities assessment. Families have already started to look for new school places during the consultation period. Some have already decided to take up offers at other schools in and outside Tower Hamlets with the vast majority able to transfer to nearby schools.
- 6.7 The staff at St Matthias have remained throughout the period of this closure proposal to ensure the School's good running. A decision to close St Matthias will require them to apply for new jobs. LA officers, the LDBS and the School Governing Body are working together to support staff through this change and finding new positions. Details of meetings held with the staff and their unions are included below. A formal staff consultation will take place, if a decision is made to close the school.
- 6.8 An Equalities Assessment (EA) has been undertaken and is presented in the supporting documentation (Appendix 2). Although there are some groups who are considered more vulnerable the EA explains how the risks are being mitigated.

7. CONSULTATION

- 7.1 The first stage of the public consultation process was undertaken from 8th June to 30th September 2020. An analysis of the responses to the first stage consultation was presented to the Mayor in cabinet on the 21st October 2020. Following the cabinet decision to issue the statutory notice, a second round of public consultation took place between the 16th November and 16th December 2020.

- 7.2 Due to coronavirus it was not possible to hold the traditional method of public and parents' meetings for both the first stage consultation and the subsequent statutory notice period. However, several alternative methods were used, in line with the Tower Hamlets guidance on public consultation processes during coronavirus. These methods along with the type of responses are explained in the first stage consultation report (see Appendix 6) as well as below.
- 7.3 Prior to the start of the consultation, the Local Authority's independent consultant held a series of preparatory meetings with St Matthias School to discuss the background and process for the consultation. These included separate meetings with the head teacher and chair of governors, the governing body, the school's senior leadership team and school staff. The following formal meetings were then held as part of the consultation, to give consultees the opportunity to ask questions and make their views known:

Parents (including wider public)	Video Presentations available online from July 2020 and updated in November 2020.
	Virtual Meetings 9.30 and 6pm 8 th July, 14 th September and 16 th November 2020
	Individual meetings in school on 5 th June 2020.
	Playground meetings on 8 th , 10 th and 18 th September 2020.
	Meetings with parents of children with EHCPs from the 18 th January 2021 onwards
School Staff	121 meetings offered 5 th June 2020
	Zoom meetings 8 th July, 14 th September, 17 th November 2020
Local Headteachers	Zoom meeting with HTs 24 th June, 12 th September, 18 th November 2020

- 7.4 Views expressed by pupils at meetings have been captured in the consultation feedback. In addition, the School has worked with pupils to help them understand the closure proposal, seeking to reassure them that they would be fully supported throughout this period.

8. RESPONSES TO THE STATUTORY NOTICE (Second Stage Consultation)

- 8.1 Three representations were received in response to the statutory notice. One from a CEO of a local academy trust in support of the proposal for St Matthias School to close. The other two from the Chair of the Spitalfields Trust and the Directors of Spitalfields Open Spaces. Both these organisations did not raise objection to St Matthias School closing, but a concern that Christchurch CE School was included as a potential destination for the displaced St Matthias pupils. These organisations were concerned that should nursery pupils at St Matthias transfer to Christchurch it could result in a delay to the removal of a building adjacent to the Christchurch School site, which is being used by Christchurch for its early years provision and is due for demolition following an earlier court ruling on a planning dispute. Copies of the full responses can be viewed [here](#)
- 8.2 The Local Authority has responded to both the Spitalfields Trust and Spitalfields Open Spaces to confirm that the requirements of the court ruling would not be affected by the potential for some of the eight nursery pupils at St Matthias to move to Christchurch, particularly as most of these children would be starting the reception year in the main primary School by September 2021 or 2022 at the very latest. There is no need for the LA to seek to increase the capacity at Christchurch

School or any other local schools to accommodate the St Matthias pupils, given that there is already sufficient provision locally for these children.

- 8.3 The council has now addressed all of the points raised in response to both the statutory notice and the earlier public consultation, neither of which presented options as an alternative to school closure. Prior to issuing proposals for the closure, the St Matthias School governing body and LDBS did consider alternatives, which included the possibility of a hard federation or amalgamation with a neighbouring Church of England School. This work was supported by the LA's independent consultant. The closer analysis of this possible alternative determined that it would not be possible, in the context of the significant funding, accommodation and other constraints.

9. TIMETABLE FOR IMPLEMENTATION OF SCHOOL CLOSURE

- 9.1 If the decision is made for St Matthias to close, the timetable for implementation will be as follows:

Mid- March 2021	A formal staff consultation will be issued.
April 2021	Pupils who families choose for them to move to alternative schools, immediately will do so from the first day of the Summer term i.e. April 2021*.
July 2021	Pupils who families choose for them to remain at St Matthias until the end of the school year (July), will move to their new school from the first day of the Autumn term i.e. September 2021.
August 2021	St Matthias School will continue to operate up until the 31st August 2020 and then formally close.

- 9.2 The table below shows the numbers on roll at St Matthias at the start of the school year (Oct 2020) and the numbers at January 2021. *The Local Authority has informed parents that the children should remain at St Matthias until the end of the school year, even if a decision was made to close the School. However, some parents have taken action of their own volition to transfer their children to alternative schools earlier:

Year Group (2020/21)	Roll as at 1 st Oct 2020	In-Year Transfers*	Roll as at 4 Jan 2021
N	8	0	8
R	14	3	11
1	12	2	10
2	17	3	14
3	12	3	9
4	19	4	15
5	13	2	11
6	26	1	25
Total	121	18	103

- 9.3 The Local Authority, working with St Matthias and neighbouring schools, will ensure that the remaining pupils are able to take up alternative places by September 2021. The Local Authority's Parental Engagement and SENDIAS services are already working with the families of vulnerable children and those

with special educational needs to ensure that their school transfers are properly supported and that they are able to make a successful transition.

10. EQUALITIES IMPLICATIONS

10.1 An Equalities Assessment has been conducted by the LA and is attached at Appendix 2. This must be considered in detail before the Mayor in Cabinet considers the matters above, as part of his decision on whether to close St Matthias CE Primary School.

10.2 The Equality Act 2010 requires the LA, when exercising its functions, to have due regard to eliminate discrimination, harassment, victimisation; advance equality of opportunity; and to foster good relations between persons who share a relevant protected characteristic and those who do not (“the Public Sector Equality Duty”).

11. OTHER STATUTORY IMPLICATIONS

11.1 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.

(i) Managing the Impact of Proposed Closure on School Staff

11.2 The LA, LDBS and School Governing Body is working together to support the School staff through this change. A formal staff consultation will only take place once the final decision has been made on the schools' closure. If the final decision is for the school to close staff will be supported through further training, coaching and workshops to find redeployment opportunities at other local schools.

(ii) Best Value Implications

11.2 The Local Authority has a duty to ensure that schools are fulfilling their duties and that value for public money is achieved, whilst standards are maintained. They must ensure that they do not fall into financial deficit so that they are unable to sustain an offer of quality education for children. This proposal is being considered in view of concerns over the School's viability and therefore its ability to sustain high quality education for its children.

11.3 The proposal presents significant mainstream revenue and capital implications for the council. When a school closes its finances (and any surplus or deficit) is returned to the LA. In the case of this School's closure the deficit balance will transfer to the council.

11.4 Closure of St Matthias will remove the School's deficit budget and the requirement for additional funding from the Dedicated School's Grant, (DSG). This will reduce the pressure on the DSG that is caused by having a number of schools requiring licensed deficits and ensures an efficient use of resources across all schools.

(iii) Environmental (including air quality)

11.5 There are no environmental issues arising from this proposal.

(iv) Risk Management

11.6 If this recommendation is agreed, the closure process will be carefully managed and evaluated in line with statutory guidance, mindful of the needs of the children, families and staff, and thoroughly addressing the considerations of the Equalities Assessment. The plan to close the School on the 31st August 2021 will allow enough time for arrangements to be completed by September 2021 and therefore minimise or mitigate any risks.

(v) Safeguarding

11.7 The report deals with the council's approach to managing the supply of school places for the local population. The efficient supply of school places contributes to the safeguarding of children by ensuring their access to good quality, sustainable education provision.

(vi) Data Protection / Privacy Impact Assessment

11.8 The proposals presented in this report have followed an initial and formal public consultation using a variety of mechanisms. All responses received through these mechanisms or made directly to council officers or members have been included in the analysis of the feedback received. These responses have only been used to assess the community's view of the proposals and not for any other purpose.

11.9 The council handles information in accordance with the Freedom of Information Act 2000 and the Data Protection Act 2018 and is the data controller for the purposes of the Data Protection Act 2018. For more information, the privacy notice for Pupil Services can be accessed here.

12. COMMENTS OF THE CHIEF FINANCIAL OFFICER

12.1 The current and projected size of the School mean that they are unable to support the staffing infrastructure that is required with the levels of funding that are provided through the national funding formula. If the School continues overspending their funding allocation the costs of that overspend would fall on the council if closure was at a later date. Early action reduces the general fund exposure for the council

13. COMMENTS OF LEGAL SERVICES

13.1 Section 14 of the Education Act 1996 requires local authorities to provide sufficient schools for primary and secondary education in their area. Local authorities also have best value duties in the performance of their functions under the Local Government Act 1999.

13.2 The procedure for closing a school is set out in the Education and Inspections Act 2006, the School Organisation (Establishment and Discontinuance of Schools) Regulations 2013, and the statutory guidance 'Opening and Closing Maintained Schools' (November 2019). The proposals set out in this report comply with the above legislation and guidance.

Linked Reports, Appendices and Background Documents

Linked Report

- 21st October Cabinet Report - Outcome of the consultation on the proposal for the closure of St Matthias Primary School

Appendices

Appendix 1	Statutory Public Notice (2 nd stage consultation)
Appendix 2	Equalities Assessment
Appendix 3	Public Consultation Paper (1 st stage consultation)
Appendix 4	Summary Analysis on the Current Financial Position of St Matthias School
Appendix 5	LA Five Year Primary Aged Pupil Projections for the West of the Borough
Appendix 6	Public Consultation (1st Stage) Feedback Report

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

The following document(s) has been used in the preparation of this report:

- 'Opening and Closing Maintained Schools – Statutory Guidance for Proposers and Decision- Makers' (November 2019) in conjunction with Part 2 and Schedule 2 of the Education and Inspections Act (EIA) 2006 as amended by the Education Act (EA) 2011

- The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013

Officer contact details for documents: N/A

Consultation information:

Statutory Notice on the proposal for the closure of St Matthias Church of England Primary School

4 December 2020

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Introduction

Notice is given in accordance with section 15 of the Education and Inspections Act 2006 (as amended by the Education Act 2011) and the School Organisation (Establishment and Discontinuance of Schools) Regulations 2013 that Tower Hamlets local authority intends to discontinue St Matthias Church of England Primary School with effect from 31 August 2021.

Contact details

Name and address of Local authority publishing the proposal:

Tower Hamlets Council, Town Hall, Mulberry Place, 5 Clove Crescent, London E14 2BG

Name, address and category of school proposed to be closed:

St Matthias Church of England Primary School, Bacon St, Shoreditch, London E2 6DY

Implementation

Date on which it is proposed to close the school:

Tuesday 31 August 2021.

It is proposed to implement the closure as follows:

Following the closure of St Matthias Primary School, it is proposed for the remaining pupils on roll at that time to transfer to other primary schools in the local area. The local authority has identified sufficient vacancies at local 'Good' or 'Outstanding' primary schools within 0.2 miles from St Matthias, and including places at nearby Christchurch, Church of England Primary School in Brick Lane, E1 (0.9 mile).

There are also vacancies at other schools in the areas to the west of borough, providing St Matthias families with a range of options to secure a suitable school for their child. The local authority will endeavour to meet parental preferences for school places, where possible.

The local authority is already undertaking preliminary work with St Matthias, Christchurch and other schools in the area on the necessary transition planning for children and families, should the Council decide for the School to close on the date proposed.

Reason for closure

The local authority, in partnership with the governing body of St Matthias has reluctantly determined that school should now close due to a substantial decline in

its pupil numbers over an extended period and the associated impact on its educational and financial viability.

Pupil numbers in Tower Hamlets schools are currently falling in the west of the borough where St Matthias School is situated. This means that St Matthias, along with other schools, has not had enough pupil numbers to fill its classes. The school is now well below its capacity in all of its year groups and this is causing increasing difficulty in maintaining a broad and balanced curriculum with enhanced extra-curricular activities.

The fall in pupil numbers has adversely affected this the school's budget, which is now at significant risk. This has required St Matthias to take a number of measures to protect the quality of education, including considering whether it would be necessary to apply to the local authority for a licensed deficit. However, it is clear that should a licensed deficit be required the School would not be able to repay this within the required three-year timeframe, in accordance with the school funding regulations. The local authority is not allowed to continue to fund schools that are not financially viable and, after considering the alternative options available, it was determined that it would be necessary to propose for St Matthias School to close. (see Appendix 1 for the stage one consultation).

Pupil numbers and admissions

The numbers for whom provision is currently made at the school:

St Matthias Church of England School is a co-educational mainstream Primary School for pupils aged three to eleven. The School has a published admission number (PAN) of 30 for each year group, giving a total of 240 places (including nursery places). As at September 2020, the school had 106 pupils on roll.

Displaced pupils

From Wednesday 1st September 2021, the pupils remaining on roll at St Matthias School will have the offer of places at other local schools. There will also be opportunity for parents to secure places at schools within the surrounding areas, including the nearby Christchurch Church of England School.

Current projections for school places indicate that there are enough places for future cohorts following the closure of St Matthias. The local authority will continue to monitor the projected need for future school places and propose changes, if required, to ensure sufficient places are available.

Impact on the community

St Matthias does not currently provide additional services or use of its facilities for the wider community and there are a number of alternative facilities available for hire at other nearby locations. There will therefore be no loss of any enrichment clubs or programmes for local families in the community.

Rural primary schools

Not applicable

Balance of denominational provision

The local authority is under an obligation to consider the impact on the balance of denominational provision in the area before it determines the outcome of school closure proposals. St Matthias is a Church of England school. Were St Matthias to close, then Church of England primary school options would continue to be available in Tower Hamlets at nearby Christchurch and St John's schools. There are also other faith school places accessible in neighbouring catchment areas.

As there are other Church of England schools as well as other faith schools locally and surrounding areas, the proposed closure will have minimal impact on the balance of denominational school provision in Tower Hamlets.

Nursery provision

Children currently attending the nursery provision at St Matthias School will be able to continue to do so until end of the current school year (July 2021). They will then be able to transfer to the nursery provisions at other local schools in the area or to the reception year at these schools, if they have reached school age.

Sixth Form provision

Not applicable

Special educational needs provision

St Matthias School does not provide educational provision recognised by the local authority as being reserved for children with special educational needs. There are 31 pupils on roll (September 2020) who have been identified as having special educational needs (SEN support) and six pupils with an education health and care plan (EHCP). All pupils identified as having special educational needs will have the offer of places at other local schools where their individual needs will be adequately met.

Travel

The approximate distances for home to school travel for pupils from Nursery to Year six currently attending St Matthias ranges from 0.09 to 3.5 miles.

There are enough places at other nearby schools to ensure that the maximum distance any child would travel to school would be no more than 3.5 miles from their home address, unless the families decide to secure places at alternative schools with vacancies further away.

It is anticipated that pupils will walk or use other sustainable modes of travel to alternative schools in the local area and therefore any impact on road traffic would be minimal. There is also sufficient local transport provision to cover the routes from home to school of current pupils.

Finances

When a school closes its finances (any surplus or deficit) is returned to the council. St Matthias' deficit balance will transfer to the Council on the School's last business day, Tuesday 31 August 2021.

Procedure for making representations (objections and comments)

Within four weeks from the date of publication of this statutory notice, any person may object to or make comments on the proposal by email or by post.

Closing date for responses is 5pm, Thursday 7 January 2021.

By email: school.organisation@towerhamlets.gov.uk

By post: School Organisation and Place Planning Manager
Pupil Services and School Sufficiency
Tower Hamlets Children and Culture
Town Hall
Mulberry Place
5 Clove Crescent
E14 5BG

We will not be able to consider any responses received after 7 January 2021.

All responses received during the representation period will be published on the Council's website in early January 2021.

The website address is: talk.towerhamlets.gov.uk/statutory-notice-st-matthias

Appendix 1

Consultation information:

First Stage consultation feedback report on the proposal for the Closure of St Matthias Church of England Primary School

20 October 2020

Report compiled by Dr Helen Jenner, Independent Consultant, Tower Hamlets Primary Review.

Introduction

This report summarises the planning undertaken to lead to a public stage one consultation, and the responses to that consultation, on whether or not St Matthias Church of England Primary School Governing Body should support the local authority to formally consult on the closure of St Matthias School, through the publication of a Statutory Notice (stage two). An earlier version of the report was sent to governors to support them to reach an informed decision at their meeting on 8th October 2020.

Background

St Matthias School Governing Body and the London Diocesan Board for Schools (LDBS) were prompted by the Tower Hamlets Primary Review¹ to consider the sustainability of St Matthias Church of England Primary School, given its vulnerability to falling rolls. The Governing Body reluctantly reached the conclusion that to close the school and relocate children to other nearby schools would be the best solution to optimising educational provision in the area.

The Tower Hamlets Primary Review commissioned an Independent Consultant, Dr Helen Jenner, to work with schools they had identified as being at risk due to demographic change in the borough. As well as working with the schools, Dr Jenner was asked to produce a public report “Future Ambitions” setting out principles for developing school relationships for resilience and excellence. This document was shared with the Diocese, all Headteachers, Unions and Governors in March 2019. Regular updates on the Primary Review have been included in the termly Director’s Report for Governors and discussed by the Primary Review Action Group (PRAG), on which the Diocese and Headteachers are represented.

Governors planning

The governing body have met on several occasions, including directly with the local authority, LDBS and with the Lead Member for Children’s Services to consider the future of the school. They also sought the advice of an independent finance

¹ Tower Hamlets Primary Review

https://www.towerhamlets.gov.uk/ignl/education_and_learning/schools/Primary_Review_for_parents.a_spx

consultant, to explore options. They have been supported by LDBS, the Independent Consultant and local authority staff to review the implications for the school, and to undertake a pre-publication consultation.

Governors and the Headteacher have met, in various groupings, regularly since the local authority first identified the school as being “in scope” for review, in July 2018. There have been several changes in Chair of Governors since that time, and three Headteachers. In June 2020 it was agreed that Julian Morant, the headteacher at Christchurch would be Executive Headteacher at St Matthias, when the acting headteacher left to take up a post in another school.

A Governing Body meeting with governors was held on 26 May to discuss the Primary Review, the Future Ambitions Report, and the best responses for the school. The governing body agreed arrangements for informal (pre-publication) consultation on the possible closure of the school, to run from 8 June-30 September.

Summer term activities

A consultation document² was prepared, and agreed, with the local authority and the London Diocesan Board for Schools. This was given in paper copy to all parents, circulated to Tower Hamlets Headteachers, through the Headteacher’s Bulletin; emailed to Trade Unions, and the Secretary of State has been notified of potential changes.

Information about the consultation was also placed on the church website, because the school website was not working in the Summer Term. The link was sent to all parents.

The website included a letter to parents and staff from the Chair of Governors, a copy of the consultation document, and 3 short videos explaining the situation.

Because of coronavirus open meetings were not held in the Summer Term, however a range of ways to feed into the consultation were organized:

1. A box was set up in the playground at the entrance to the school, where people could leave comments, response forms and any questions.
2. A response form (or any other written format) at the end of the consultation document to record views was able to be emailed, posted, or handed to the school.
3. A special email address was set up for comments
4. Personal phone calls were offered.
5. The local authority consultant was available for one-to-one socially distanced questions/feedback on 8 July
6. Virtual “Zoom” meetings were also set up for staff and parents on July 8th

An update report was provided for the local authority, Governors and LDBS on 22 July³. It also made recommendations for further consultation activities.

Autumn Term Activities.

² Available on request to the school

³ Available on request to the school

Julian Morant took over as Headteacher at the start of the Autumn Term 2020.

In meetings with the Headteacher and Chair of Governors it was agreed that there should be more face to face opportunities for parents to feed into the consultation.

The following opportunities have taken place during September

- To actively engage the parents on 8 and 10 September parents were spoken to at the school gate.

This led to discussions, questions and comments engaging 24 parents on Tuesday and 26 on Thursday. These have been included in the attached Frequently Asked Questions summary.

- A further opportunity to attend a zoom meeting (14 September) was taken up by four parents.
- Staff were offered the opportunity to attend a further zoom meeting, no-one chose to do so
- A playground briefing meeting for parents was held Friday 18 September, at 9.15am, attended by 14 parents and four staff members, and a second briefing was held on 28 September at 2.45pm, which was attended by 13 parents.

Questions raised in these meetings have been addressed in the attached Frequently Asked Questions summary.

- The Headteacher has also had regular discussions with staff, and all staff have had a one-to-one meeting, with the headteacher, to discuss their individual concerns and plans. An optional staff meeting will also be arranged for staff to hear the feedback from the pre-publication consultation.
- Groups of parents have also visited nearby local schools.
- Special education needs coordinators (SENCOs) and headteachers from the three closest schools have had meetings to discuss transition.
- Parents and staff were reminded that they do have the opportunity to submit written responses.

In addition, many individual queries have been addressed by Pupil Services, the Parent and Family Support Team and the Independent Consultant about admissions processes. These are not detailed in this report because they are not questions pertaining to St Matthias School. They are, however, an indicator of the anxiety that parents are feeling, despite messages of re-assurance and the guarantee of a good local school place in September 2021, if the decision is taken to close the school.

Written responses received

- FIVE forms were received, all from parents, in the Summer Term.

- A further TWENTY were received in the Autumn Term (one parent submitted two forms)
- EIGHT from staff members
- EIGHT from parents
TWO from members of staff who are also parents
- ONE Other (not specified)

Five responses accepted, or partially accepted the proposal; one was unsure and 18 did not accept the proposal. One parent submitted two forms, but this has been counted as one response.

Of those who said no, they did not accept the proposal, reasons given were:

- Children doing well/good school - 13
- Other schools too far away - 4
- Effect on education - 7
- Wasn't expected - 2
- Too short notice - 4
- Upsetting for child - 5
- Don't like the idea of partnership - 2
- Will SEN needs be met - 3
- Accessibility of building - 3
- Concern that decision is being taken because "money talks" - 1
- Job concerns - 2
- Strength of staff team - 2

Across responses several other specific points were made:

- TWO said Christchurch partnership is appropriate for location reasons and because its C of E
- THREE felt the partnership with Christchurch is quite limited
- THREE asked that good support be given if children have to move school
- ONE asked for the proposal to be reconsidered
- TWO felt the decision had already been taken
- ONE suggested that William Davis should be closed rather than St Matthias
- I felt that communication with parents has not been clear enough over last 2 years
- THREE were concerned that visits to local schools may have created anxiety, rather than reduced it.

In one to one discussions and meetings with parents strong support for the school has been voiced.

Parents and staff are sad that the school may close, and parents appreciate the quality of education their children have received.

Parents understood that numbers of children attending St Matthias had fallen and have heard rumours about the future of the school, for many years. Some parents felt that communication has not been transparent and wondered whether more could

have been done in the past, although they do recognise that other schools in Tower Hamlets and across London are facing similar challenges.

Some parents wondered whether it would be possible to close other schools, rather than St Matthias, or to amalgamate schools.

Parents sought clarification on whether they should move their children now. Re-assurance was given that there are sufficient places across the three closest schools (William Davis, St Anne's and Christchurch) for all the children and that the local authority recommends that children stay at St Matthias as a decision has not yet been made. If the decision is taken to close the school children will be fully supported with a transition programme, in the Summer Term, so that they are well prepared for new schools.

Overall there is a strong commitment to the school, and sadness that it may close, however, there is also an understanding that this may happen and a desire to ensure children have the best possible year at St Matthias, and are well supported to transition to new schools, if that is required.

Feedback to stakeholders

It is recommended that this Consultation Summary and the Frequently Asked Questions document (attached) be posted on the school website and be emailed to parents, staff and other stakeholders.

Parents and staff would like to be regularly updated on next steps.

Governing Body next steps

St Matthias governing body met on 28 September to consider the feedback so far, and to raise any points they wish to include. In the consultation. In this meeting they considered the key messages from parents and staff, and the range of opportunities that have been given for feedback. They were re-assured that sufficient feedback opportunities had been given and felt that the level of response was acceptable, but this was partly because many parents were resigned to the idea, and because of the impact of coronavirus. They recognised that rumours over some time may have impacted on parents' views. They also reflected on the work they had put into considering various options over time, to make sure there was no sustainable alternative plan for the school's future.

At their quorate governing body meeting on 8 October they considered an earlier draft of this report and whether they are recommending that the local authority move to publish statutory notices. They unanimously concluded that they 'reluctantly agree to the local authority statutory notice of closure' of St Matthias. They were clear that whilst they are not in favour of closing the school, they understand that it is no longer viable and there is no alternative.

This report will be shared with governors, the LDBS and the local authority.

It is recommended that it is also available for staff and parents and St Matthias to read.

A decision will be made regarding whether to the progress to statutory notices (stage two consultation) at the Council Cabinet meeting in November 2020. Parents, staff and the LDBS should be kept up to date as matters progress.

If a statutory notice is published the decisions regarding the closure of the school would be made at the Council Cabinet meeting on 3 March 2021. The statutory notice would recommend a closure date of 31 August 2021.



Equality Impact Analysis: (EIA)

Section 1: Introduction

Name of Proposal **Closure of St. Matthias School**

For the purpose of this document, 'proposal' refers to a policy, function, strategy or project)

Service area & Directorate responsible **Pupil Services, Children & Culture**

Name of completing officer **Elizabeth Freer**

Approved by Director/Head of Service **Terry Bryan**

Date of approval **14 /01/01**

Conclusion - To be completed at the end of the Equality Impact Assessment process

This summary will provide an update on the findings of the EIA and what the outcome is. *For example, based on the findings of the EIA, the proposal was rejected as the impact on a particular group was disproportionate and the appropriate mitigations in place. Or, based on the EIA, the proposal was amended and alternative steps taken)*

Based on the findings of this EIA, there are no significant issues to prevent moving to the next stage of formal consultation, which is to proceed to the issuing of the statutory notice. This will provide further opportunity for parents, pupils, staff and wider community to give their views and raise any objections.

This proposal will require further analysis of the equalities data on staff who are at risk of redundancy, should the proposal to close the School move forward.

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity between those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them



Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

This Equality Impact Assessment provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above, for more information about the Council's commitment to equality; please visit the Council's website.

Section 2 – General information about the proposal

Provide a description of the proposal including the relevance of proposal to the general equality duties and protected characteristic pursuant to Equality Act 2010.

This Equality Impact Assessment concerns the proposal to close St. Matthias Church of England Primary School at the end of the 2020/21 academic year. The Local Authority has identified sufficient vacancies at other local schools within close proximity to St. Matthias, and within a reasonable distance of all current pupils who will require to transfer to a different primary school if St Matthias closes. Across the west of Tower Hamlets there are also vacancies in many other schools, giving families a reasonable degree of choice. The neighbouring schools are in a stronger financial position. St. Matthias is currently rated “**Good**” by the regulatory body, OFSTED, but there is a risk that the quality of education and the continued access for pupils and their families to extended services and facilities might begin to fall at St. Matthias, despite the best efforts made by the previous and current Headteacher, staff and governors.

Tower Hamlets has a great tradition of excellent education; it values the important role that schools have in increasing the life chances of its children. However, the borough is now in a position where there is the need for longer term planning to maintain the success and future sustainability of its schools. The LA's strategic approach in ensuring the sufficiency and quality of its primary school provision on a locality basis, across the borough, is therefore designed to provide Tower Hamlets with an appropriate mix and number of high performing, financially sustainable schools.

Demand for school places is driven by population growth and housing development. Although population growth in Tower Hamlets is amongst the fastest in the country, it has not translated into the expected increased demand for primary school places across the borough. Falling birth rates, changing resident demographics and young families migrating out of the borough have resulted in a significant surplus of primary school places in some areas of the borough. As of January 2019, there was a 6.5% surplus in primary school places (1656 were unfilled). This is over the recommended 5% surplus that urban local authorities are recommended to operate with. The 5% surplus is designed to allow local authorities to meet their statutory duty to provide sufficient school places, yet still enable parents to have some choice of schools.

The impact of falling rolls in certain areas of the borough, reductions in education funding and schools in financial deficit, present a number of challenges. The significant pupil population changes are affecting schools across the Borough and have resulted in additional pressures for schools in the West. These pressures are not only a reflection of a reduction in their pupil numbers, but also a combination of cash flat Dedicated Schools Grant (DSG) allocations over several years and the national school funding formula changes affecting Tower Hamlets and other London Boroughs. The national funding formula changes came into effect back in 2018-19, but it is evident that the impact in Tower Hamlets will really begin to be felt by schools from this point onwards, as minimum funding guarantees reduce and end.

It has therefore been necessary to consider making changes that will ensure we have the right provision in the right place at the right time going forward. Provision that can be well resourced and is of high quality will enable schools to continue to thrive and offer the opportunities that children deserve: a strong curriculum with excellent teaching, enriching activities and a joyful experience at primary school.



As of September 2020, there were 630 reception places available and 121 unfilled places in the Bethnal Green catchment area, where St. Matthias is located. This equates to four FTE classes. St. Matthias has 16 of these vacancies, equating to 0.5 FTE. Projections indicate this will continue to rise. The review aims to safeguard the high-quality provision that exists within our schools and is being developed in collaboration with school leaders and other key stakeholders.

The work is being planned and supported through the LA’s work with the Tower Hamlets Education Partnership (THEP), which plays a key role in enabling schools to meet the challenge of ensuring that all children and young people in Tower Hamlets achieve the best possible outcomes and can flourish if schools are working in effective partnerships. Ultimately, the guiding principle for this work is that whatever is done should be in children’s interests, looking at a range of achievable options that will enable proper opportunity to decide how best to deliver a high quality and sustainable provision. Access to good quality school places is essential to raising achievement and addressing poverty and inequality in the long term.

The reorganisation of school provision and the development of new schools in certain areas of the borough should have a positive impact on all groups by improving accessibility, increasing parental choice and promoting inclusive education.

An Independent Consultant has also been commissioned by LBTH to work with schools, such as St. Matthias, which were identified as being at risk due to demographic change in the Borough. As well as working with schools, Dr Jenner was asked to produce a public report “Future Ambitions”¹ setting out principles for developing school relationships for resilience and excellence. This document was shared with all Headteachers, Unions and Governors in March 2019. Regular updates on the Primary Review have been included in the termly Director’s Report for Governors.

Section 3 – Evidence (Consideration of Data and Information)

What evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

St. Matthias is a small school so, as pupil numbers have fallen (Chart 1), the budget has been greatly impacted. For example, in the academic year 2019/20, Reception, Yr1, Yr2 and Yr. 4 had below 20 children (Chart 2). The numbers have decreased again for this academic year (Chart 3), with only one year group containing more than 20 children, Yr. 6.

The two largest classes in the academic year 19/20 (Year 5 and 6) will have left St Matthias by September 2021, which will further reduce the budget. This will mean that the school would have to significantly reduce staffing and resources in order to remain within their budget. This may then have an impact on the quality of education they are able to provide. If the school fell into deficit, the Local Authority are not allowed to continue to fund schools that are not financially viable, especially when you consider the further impact of the changes to the National Funding Formula.

Chart 1: Reception Applications 2017-2020 by preference (LBTH School Admissions)

Schools	PAN	Total 20/21	Total 19/20	Total 18/19	Total 17/18
Christchurch CofE School	30	44	49	53	36
Columbia Primary School	60	104	108	150	124

¹ The Future Ambitions Report is available on the Tower Hamlets Primary Review Website.



Elizabeth Selby Infants School	60	73	67	85	82
Hague Primary School	30	58	59	64	60
Kobi Nazrul Primary School	30	58	54	65	63
Mowlem Primary School	30	53	49	48	43
Osmani Primary School	60	99	93	98	96
St Anne's Catholic Primary School (now St Anne's and Guardian Angels)	60	38	57	57	49
St Elizabeth Catholic Primary School	60	63	54	66	73
St John's CofE Primary School	30	23	27	41	56
St Matthias CofE Primary School	30	24	15	30	33
Stewart Headlam Primary School	30*	39	44	58	65
Thomas Buxton Primary School	60	91	99	95	95
Virginia Primary School	30	51	65	78	78
William Davis Primary School	30	36	32	40	53
Grand Total	630	854	872	1028	1006

Chart 2: St Matthias Year Groups (Spring Census 2020)

School	Year Groups								Total
	N1	R	1	2	3	4	5	6	
St Matthias	20	14	17	15	20	14	26	22	176

Chart 3: St Matthias Year Groups (September 2020)

School	Year Groups								Total
	N1	R	1	2	3	4	5	6	
St Matthias	0	11	12	16	9	19	13	26	106

Implications for children

The children will be able to stay at St. Matthias until the end of the Summer Term 2021, when the current Yr. 6 will then transition to secondary school. Families will be supported to move to neighbouring schools during the Summer Term, if the decision to close is agreed. There are enough vacancies available at neighbouring schools to accommodate all children attending St Matthias (Chart 4). This includes other Church of England schools, and a Catholic school, so that parental choice to receive a faith education can still be met.

The Local Authority has recommended that the group of schools that children transition to is small, to reduce travel distances, but also to support children to transition with other children that they know. However, families who wish to consider other schools closer to their homes will also be supported to do so.

Parents will be able to apply to those schools, and places will be allocated using the Tower Hamlets Arranged Admissions criteria in the Summer Term 2021. Priority will be given to pupils who will be applying owing to a school closure.



Chart 4: Vacancies at neighbouring schools per year group (Sept 2020 LBTH data)

Please note: Yr. 6 is not included in this graph as the 6 pupils in Yr. 6 at the time of this data will have transitioned onto secondary school in Sept 2021. Therefore, the children in this age group are unaffected by this proposal.

School	PAN	Reception	Y1	Y2	Y3	Y4	Y5
Christ Church	30	4	0	9	6	9	6
St. Anne's & Guardian Angels	90	37	25	25	23	24	13
William Davis	30	10	15	10	7	9	9
Vacancies		51	40	44	36	42	28

A full programme to support children through this difficult period will be put in place, with the aim of helping them to recognise that moving school presents new opportunities as well as acknowledging how they have benefitted from their education at St. Matthias.

Open days at nearby schools have already been held so that parents were able to visit now that schools have reopened:

William Davis: 15th and 22nd September

St Anne’s and Guardian Angels: Wednesday 16th and 23rd September

Christ Church: 17th and 24th September

There will be further opportunities for visits later in the school year. These visits were planned to be at the start of the academic year so that parents could see the quality of the places available and feel reassured that a quality local school place is available for every child.

Parents will also be given the opportunity to apply for their children to move to other schools before August 2021 through the in-year admissions process, although the Local Authority would recommend allowing children to finish the academic year at St Matthias, so that they can be part of a well-planned transition to their new schools.

Consultation

The governing body of St Matthias School was prompted by the Tower Hamlets Primary Review² to consider the sustainability of St Matthias C of E Primary School, given its vulnerability to falling rolls which in turn has financial implications. It reached the conclusion that to close the school and relocate children to other nearby schools may be the best solution to optimise educational provision in the area.

Governors and the Headteacher have met regularly in various groupings since July 2018, when the school was first identified as being “in scope” for review. During this time, there have been several changes in Chair of Governors, and three Headteachers. In June 2020 it was agreed that Julian Morant, the Headteacher at Christchurch would be Executive Headteacher at St Matthias, when the Acting Headteacher left to take up a post in another school.

² Tower Hamlets Primary Review

https://www.towerhamlets.gov.uk/lgn/education_and_learning/schools/Primary_Review_for_parents.aspx



The governing body has also met on several occasions, including directly with the Local Authority, to consider the future of the school. They have been supported by the Independent Consultant and Local Authority staff to review the implications for the school.

A Governing Body meeting was held on 26th May 2020 to discuss the Primary Review, the Future Ambitions Report, and the best responses for the school. The governing body agreed arrangements for an informal (pre-publication) consultation on the possible closure of the school, to run from 8th June – 30th September, 2020.

Summer Term Activities

A consultation document was prepared and agreed with the Local Authority. This was given in paper copy to all parents, circulated to headteachers in Tower Hamlets through the Headteacher's Bulletin; emailed to staffing unions, and the Secretary of State was notified of potential changes.

Information about the consultation was also placed on the website <http://st-matthews.org.uk/st-matthias-consultation>. This included a letter to parents and staff from the Chair of Governors, a copy of the consultation document, and 3 short videos explaining the situation.

Due to the limitations imposed on public gatherings by COVID-19, it was not possible to hold face to face meetings for larger groups at the school or elsewhere. In order to ensure that pupils, parents, staff and the wider community were able to engage with and respond to consultation a range of opportunities were organised as follows:

- A response form (or any other written format) at the end of the consultation document to record views to be emailed, posted, or handed to the school.
- A special email address was set up for comments
- A box was set up in the playground at the entrance to the school, where people could leave comments, response forms and any questions.
- The independent consultant was available for 1 to1 socially distanced questions/feedback on July 8th, 2020.
- Virtual meetings were also set up on July 8th, 2020 (one at 9 am, one at 6pm) with the independent consultant to hear about reasons for the proposal.
- Parents were given the opportunity to feed into virtual meetings with the Parental Engagement Team on 3rd and 10th July
- Staff were given the opportunity to attend socially distanced or virtual meetings to discuss the proposal with Helen Jenner.
- Everyone was offered the opportunity to request a socially distanced face to face meeting, or a personal phone call.

An update report was provided for the LA, Governors and LDBS on July 22nd 2020 which made recommendations for further consultation activities.

Autumn Term Activities

Julian Morant took over as Headteacher at the start of the Autumn Term 2020.

In meetings with the Chair of Governors it was agreed that more face to face opportunities should be available for parents to actively engage with the process. Therefore,

- On 8th and 10th September 2020, parents were spoken to at the school gate.
- There was a further opportunity to attend a virtual meeting on 14th September for parents
- A playground briefing meeting for parents was held on 18th September



In addition,

- The Headteacher has also had regular discussions with staff, and all staff have had a 1-1 meeting with the Headteacher to discuss their individual concerns and plans.
- Groups of parents have also visited nearby local schools.
- SENCOs and Headteachers from the 3 closest schools have had meetings to discuss transition.

Governing Body next steps

St Matthias governing body then met on September 28th 2020 to review feedback. At their governing body meeting on 8th October, 2020 they considered the report on the informal consultation which was provided by the independent consultant and used it to make a response to the council, on whether or not to recommend proceeding with the school merger proposal. A report summarizing the feedback on the consultation will be available for staff and parents during the first half of the Autumn Term 2020.

Other Evidence

Financial position of St. Matthias

Ofsted reports

Pupil projections

School census data of St. Matthias and neighbouring schools

Demographic data held on current staff and pupils at St. Matthias and neighbouring schools

Equality Act 2010

Minutes of meetings where the future of St. Matthias has been discussed

Consultation Document

Consultation Feedback Report

School Policies (Equalities, SEND and Inclusion)

School Admissions Code

Name of officer completing the EIA:

Service area:

EIA signed off by:

Date signed off:



Section 4 – Assessing the impacts on residents and service delivery

	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?																												
Age (All age groups)			X	<p>A change to schools during any phase of education can be viewed as possibly disruptive. However, year 6 children who left in Summer 2020 will not be impacted, nor will the current year 5 who will also have transitioned to secondary school if this proposal is implemented in September 2021. There are currently 106 pupils at St Matthias School, the lowest number of pupils in any Church of England school in the borough. This is also the lowest number of pupils in any school in the Bethnal Green catchment area.</p> <p>In addition, the change is proposed to take place between academic years and therefore allow a new start at an appropriate time in each pupil's yearly academic progression, minimising disruption.</p> <p>Children moving from reception to year 1 may be particularly vulnerable, as may those moving from year 1 to year 2, the year in which children take their SATs. However, the numbers at St Matthias for these year groups will be relatively low at 23 pupils. In addition, the educational outcomes for these children should not be adversely impacted by the move to a new school and could be improved. This is because the Ofsted standard is either 'good' or 'outstanding' for all primary schools.</p> <table border="1"> <thead> <tr> <th></th> <th></th> <th colspan="3">Progress Score</th> <th>LA Average 72%</th> <th>LA Average 14%</th> </tr> <tr> <th>School</th> <th>Ofsted Grade</th> <th>Reading</th> <th>Writing</th> <th>Maths</th> <th>Pupils meeting expected standard in reading, writing and maths</th> <th>Pupils achieving at a higher standard in reading, writing and maths</th> </tr> </thead> <tbody> <tr> <td>St Matthias</td> <td>Good</td> <td>Average</td> <td>Average</td> <td>Average</td> <td>59%</td> <td>4%</td> </tr> <tr> <td>Christ Church</td> <td>Good</td> <td>Well above average</td> <td>Well above average</td> <td>Well above average</td> <td>84%</td> <td>4%</td> </tr> </tbody> </table>			Progress Score			LA Average 72%	LA Average 14%	School	Ofsted Grade	Reading	Writing	Maths	Pupils meeting expected standard in reading, writing and maths	Pupils achieving at a higher standard in reading, writing and maths	St Matthias	Good	Average	Average	Average	59%	4%	Christ Church	Good	Well above average	Well above average	Well above average	84%	4%
		Progress Score			LA Average 72%	LA Average 14%																										
School	Ofsted Grade	Reading	Writing	Maths	Pupils meeting expected standard in reading, writing and maths	Pupils achieving at a higher standard in reading, writing and maths																										
St Matthias	Good	Average	Average	Average	59%	4%																										
Christ Church	Good	Well above average	Well above average	Well above average	84%	4%																										



St Anne's and Guardian Angels	Good	Average	Above average	Average	74%	18%
William Davis	Good	Well above average	Well above average	Well above average	66%	17%

The St. Matthias financial position is such that it is recognised that, were it remain open, a reduced budget would require a reduction in staff and resources. This would eventually adversely affect the quality of education that the school has been able to provide, thereby impacting on children of all ages. Currently, staff have had to teach mixed age classes, which is not ideal as the National Curriculum is designed to be taught in single age classes. Fewer staff could also mean the loss of a range of expertise which would begin to affect the learning experience of pupils.

In response to parents expressing concerns during the informal consultation period about the impact on their children should St Matthias close, staff and governors are committed to a final year together to celebrate the contribution St. Matthias CofE School has made to education and the local community, whatever decision is reached in March 2021.

Staff

There will also be an impact on staff at the school, who could be made redundant under the proposal. The spread of staff across the age bands is fairly even, with those under 30 and above 60 less affected than those aged 30-59. Staff in their 40s will be more affected than other age groups.

	% Staff in each age group				
School	20s	30s	40s	50s	60s
St. Matthias	4	8	10	5	5

Further interrogation of the data needs to be done in order to assess what job roles are currently allocated at St. Matthias to each age range. This will help to determine whether staff in those age ranges will be disproportionately affected or not. Appropriate support and training will be provided to staff to ensure that they are able identify and access job opportunities. Support will be provided to the school's senior leaders and governing body to ensure that they are to fulfil their role effectively supporting staff

				throughout the process.
Disability (Physical, learning difficulties, mental health and medical conditions)			X	<p>At St. Matthias, of the children who will not have transitioned to secondary school at the proposed time of the school closing, less than 5 have an EHCP and 20 receive SEND support. As a percentage of the current school population, 23% of children with additional needs would suggest this cohort may be impacted more than others.</p> <p>However, the current financial situation of St. Matthias, and the anticipated need to reduce staff and resources in order not to fall into deficit, could impact this cohort the most if the school were to stay open.</p> <p>Neighbouring schools that have been identified in this EqIA as having capacity to accommodate pupils from St. Matthias are robust in their provision for children with SEND. For example, St Anne’s (before it was amalgamated with Guardian Angels) was inspected in January 2020, and Ofsted identified, <i>“Pupils with special educational needs and/or disabilities (SEND) achieve well. Staff understand pupils’ needs and their individual barriers to learning. They provide pupils with effective personalised support. This ensures that pupils with SEND learn successfully alongside their peers. “Ofsted stated in November 2019 at William Davis, “Pupils with special educational needs and/or disabilities (SEND) learn alongside their peers in all subjects. They receive the help they need to learn in smaller, more manageable steps”.</i></p> <p>For children with an Education, Health and Care Plan there will be an annual review meeting during the academic year 2020/21 where they will be able to discuss with the SENCO where would be the best school to meet their child’s needs, if the decision to close St Matthias is taken. For each of these children, a specific transition plan will be put in place to ensure any move is seamless and the new provision has the appropriate support and resources in place. St. Matthias staff, through the informal consultation period, expressed their commitment to supporting these children. These pupils will be given priority consideration for their preferred choice of school.</p> <p><u>Staff</u></p> <p>No staff are identified as having a disability, although several refused to say. It would be prudent to ask staff again, in order to ensure that any who may need additional support, or are more vulnerable when looking for new jobs, are able to access appropriate help and advice and are not disadvantaged by the process.</p>
			X	The gender breakdown for pupils at St. Matthias is split fairly evenly – 47% are female and 53% are male.



Sex				<p>This does not represent a disproportionate impact. Indeed, as stated above, if St. Matthias were to remain open, there is the real risk that the financial difficulties would start to adversely affect the quality of education that the school has been able to provide, thereby impacting on children of all sexes.</p> <p>Staff</p> <p>The staff gender breakdown is weighted heavily towards women at St Matthias, with 90% identifying as female. This is the case across most primary school provision in the borough and elsewhere. As teaching roles are not gender specific, this should not have a disproportionate impact on future employment for female staff.</p>
Gender reassignment			X	<p>No impact - We do not have any data available on this protected characteristic for pupils or staff.</p>
Marriage and civil partnership			X	<p>No impact - We do not have any data available on this protected characteristic for pupils or staff.</p>
Religion or philosophical belief				<p>Data on religious beliefs is not collected for staff or pupils. However, as St. Matthias is a Church of England school, the closure of a faith school can impact on this protected characteristic.</p> <p>The Local Authority has a responsibility to ensure that there are the right number of school places to meet local need, and that parents' choice of community or faith schools is maintained. They work with the London Diocesan Board in order to maintain a proportion of CofE places (this has been around 8% for the last 10 years) across the Borough, so that parents are able to choose a place at a nearby CofE school, if they wish. Demand for faith school places in the Bethnal Green catchment area, as evidenced in Chart 1, has been decreasing over the last few years. Therefore, the proportion of places available needs to be reduced to reflect this.</p> <p>There are 3 other faith schools in Bethnal Green. Two are close neighbours of St. Matthias: Christ Church is CofE, St. Anne's and Guardian Angels is Roman Catholic. St. John's is a mile away and is CofE. There are also other faith schools across the borough that would be accessible to families who wish to consider other options. Children who applied for CofE school places for the academic year 20/21 could be accommodated in two CofE schools. This would maintain the balance of children attending CofE schools,</p>



whilst also significantly reducing the number of vacant places, as well as the premises and leadership costs. The result should strengthen the remaining faith provision by increasing numbers and therefore ensure it is sustainable for the future.

Both St Anne's and Guardian Angels and Christ Church have pupils from a range of faith backgrounds. William Davis is non-denominational. This allows parents with children at St. Matthias to have the choice whether to continue to send their children to a faith school or not. Children of all faiths are welcome at all three schools.

Race

X

The main ethnicity of children at St. Matthias, which corresponds to the main ethnicity in LBTH (as per the Schools Spring 2020 census) is Bangladeshi. Therefore, this group will be impacted the most but is it not a disproportionate impact; more will be impacted owing to more children of that ethnicity attending.

Ethnicity	%
Any Other Asian Background	1
Any Other Ethnic Group	1
Any Other Mixed Background	3
Any Other White Background	7
Bangladeshi	56
Black - Any Other Black African Background	9
Black Caribbean	1
Indian	1
Information Not Yet Obtained	1
Pakistani	3
White - British	10
White and Asian	3
White and Black African	1
White and Black Caribbean	1

The neighbouring schools that parents are likely to apply to, owing to travel distance and vacancies, have a similar demographic make-up as St. Matthias, bar one: St. Anne's and Guardian Angels. As this school is Roman Catholic, predictably there are more White children attending of British, Irish or Other backgrounds.

The local authority does advise that multi-cultural schools are likely to be beneficial to fostering good relations between individuals in different ethnic and/or racial groups, as children will have the opportunity to make friends with children from different races at a formative stage of their personal development. However, there is also an awareness that some parents appreciate the option to choose a school where their child has representation on an ethnic level. Therefore, there is the possibility of this owing to vacancies in St. Anne's and Guardian Angels.

Staff

The breakdown of staff at St. Matthias evidences that no one ethnic group of will be disproportionately impacted, although White British and Bangladeshi will be impacted most as more staff of those ethnicities are employed. The job profiles of these staff, however, indicate that Bangladeshi staff may be further impacted. This is because they are generally working in non-teaching roles, of which there are fewer opportunities to transition into across the borough. Therefore, although support and guidance will be given to all displaced staff to seek further employment if they so desire, there may be the need to ensure additional support into employment or other opportunities is provided for Bangladeshi staff.

Ethnicity of staff	%
Any Other Ethnic Group	10
Bangladeshi	31
Black Caribbean	7
Indian	3
Information Not Yet Obtained	14
White - British	24
White - Irish	7
White and Black Caribbean	3

Sexual orientation

X

No impact - We do not have any data available on this protected characteristic for pupils or staff.

X

No impact - We do not have any data available on this protected characteristic for pupils or staff.

Pregnancy and maternity				
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Other

Socio-economic				<p>The percentage of children receiving FSM does vary across the neighbouring schools, with St. Matthias being one of the highest. However, as vacancies at neighbouring schools are not dependent on a parent’s financial status, we do not anticipate this will have a negative impact on children. Indeed, the speed and agility at which schools in LBTH moved to support parents with food vouchers and food parcels during the closure of schools owing to COVID 19 suggests that any children with FSM eligibility will be well supported at school in LBTH.</p> <table border="1" data-bbox="855 691 1339 959"> <thead> <tr> <th>School</th> <th>% Students on FSM</th> </tr> </thead> <tbody> <tr> <td>St. Matthias</td> <td>52.6</td> </tr> <tr> <td>Christ Church</td> <td>41.8</td> </tr> <tr> <td>St. Anne’s and Guardian Angels</td> <td>46.7</td> </tr> <tr> <td>William Davis</td> <td>58.7</td> </tr> </tbody> </table> <p>The Council may wish to consider whether uniform grants will be provided for parents to purchase a new school uniform if this is required. The uniform grant could resemble the current school clothing grant that is provided for children when they transfer from primary to secondary school.</p>	School	% Students on FSM	St. Matthias	52.6	Christ Church	41.8	St. Anne’s and Guardian Angels	46.7	William Davis	58.7
School	% Students on FSM													
St. Matthias	52.6													
Christ Church	41.8													
St. Anne’s and Guardian Angels	46.7													
William Davis	58.7													

Parents/Carers				<p>During the informal consultation period, parents raised several questions. Although they understood the reasons for the proposal, they would prefer St. Matthias not to close. Parents highlighted the quality of the staff and how happy their children were at the school. They requested information about moving to other schools and how the admissions process would work. Pupil Services and the Parent and Family Support Service should be available, as they are currently, to support parents through this process.</p> <p>It is our experience that as soon as consultation starts, parents and staff begin to consider their future and some move on. Waiting for numbers to increase or staggering the closure would not result in a positive</p>
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				<p>experience for the remaining staff or children. Parents did consider the Christ Church partnership to be beneficial, especially as it is also a Church of England school.</p> <p>Parents and carers should continue to be heavily involved in the consultation process and beyond, should the proposal progress. We are cognizant that this change, after an already stressful few months of lockdown, can be difficult and support should be offered to support parents throughout this process, should the proposal progress.</p>
People with different Gender Identities e.g. Gender fluid, Non-Binary etc				No impact - we do not have any data available on gender identity for pupils or staff.
AOB				



Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
<ul style="list-style-type: none"> Further analysis of workforce data needs to occur Bring Annual Reviews for pupils with SEND at St Matthias forward Provide support for parents/carers Review October census data for St Matthias and neighbouring schools 	<ul style="list-style-type: none"> Request current workforce data from St Matthias Assess whether any additional resources or support would be needed if the child was to transition to a new school Parent and Family Support Service to offer targeted support IPP to provide submission 	<p>By end of statutory consultation period, if the proposal progresses to that stage</p> <p>By end of statutory consultation period, if the proposal progresses to that stage</p> <p>Ongoing throughout academic year</p> <p>By end of statutory consultation period, if the proposal progresses to that stage</p>	<p>HR</p> <p>J'OS</p> <p>JM</p> <p>VB</p>	<p>Data requested</p>



Section 6 – Monitoring

Have monitoring processes been put in place to check the delivery of the above action plan and impact on equality groups?





Yes?

No?

Describe how this will be undertaken:

Appendix A

Equality Impact Assessment Decision Rating

Decision	Action	Risk
<p>As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act. It is recommended that this proposal be suspended until further work is undertaken.</p>	<p>Suspend – Further Work Required</p>	<p>Red</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.</p>	<p>Further (specialist) advice should be taken</p>	<p>Red Amber</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p>	<p>Proceed pending agreement of mitigating action</p>	<p>Amber</p> 
<p>As a result of performing the EIA, the proposal does not appear to have any disproportionate impact on people who share a protected characteristic and no further actions are recommended at this stage.</p>	<p>Proceed with implementation</p>	<p>Green:</p> 

Public Consultation (1st Stage) on the proposal to close St Matthias CE School

The Proposal

Following advice from Tower Hamlets Local Authority, and with the support of the London Diocesan Board for Schools, the governors of St Matthias School, wish to consult on a proposal to close St Matthias School, in partnership with Christ Church School, from September 2021.

Why are we proposing this change?

St. Matthias Church of England Primary School is a voluntary aided mainstream school for children aged 3 to 11 and is part of the educational provision of the London Diocesan Board for Schools (LDBS) and the London Borough of Tower Hamlets (LBTH). The school is located at Bacon Street, London E2 6DY

St. Matthias' Governing Board, in consultation with Tower Hamlets Council and the London Diocesan Board for Schools have agreed to commence the statutory process for proposed closure of the school in August 2021.

In line with the Department for Education's (DFE) guidance *Opening and Closing Maintained Schools* (2018), the council will support us with a pre-publication consultation. The Council may proceed to a formal consultation. After the formal consultation, a decision will be made by the Council with regards to closure.

Pupil numbers in Tower Hamlets schools are currently falling, particularly in the West of the borough where our school is situated. This means that St Matthias School has not had sufficient numbers to fill our classes and only Year 5 and 6 have year groups above 20. St Matthias School is a one form entry primary school with a capacity of 210 statutory age places.

As our pupil numbers fell, this affected our budget and has placed St Matthias at financial risk, this has necessitated the governing body taking difficult decisions to ensure a balanced budget and sustain educational quality. There is no capacity to request financial support from the Local Authority because they are not allowed to continue to fund schools that are not financially viable. The lower numbers each year place continual strain on the budget, and further cuts would be needed next year, and the year after. We think that it would be very sad to see St Matthias move into a decline in quality of provision or reach the stage where the Local Authority has to withdraw funding because we cannot fill our classes.

Our school already works closely with neighbouring schools, and there are sufficient vacancies within 0.5 mile from St Matthias to accommodate all the children currently attending St Matthias.

To support St Matthias through this difficult period a Partnership has been agreed between Christ Church and St Matthias School.

What would happen to our Headteacher?

As parents from St Matthias will know, Keeley Warren has decided to move to a new role at the end of the 2019/2020 school year after doing a sterling role as Acting Headteacher for St Matthias, since September 2019. Julian Morant, the current Head Teacher at Christ Church is an experienced Headteacher and has agreed on the role of Executive Headteacher across the two schools, from September 2020, for a year, in the first instance.

Both St Matthias and Christ Church Schools will maintain separate governing bodies until, at least, August 31st 2021.

Why close St Matthias?

It is important to stress that the proposed closure is not a judgement on the quality of education at St Matthias. It is the sad fact that there are fewer children in Bethnal Green and several one form entry schools, that are not full, are facing low numbers and financial difficulties.

Unfortunately, St Matthias School is facing financial challenge and is not able to afford to staff the school to ensure single year groups or the curriculum range and pupil support that is expected from schools. St Matthias has had mixed age classes in KS2 for two years now, although our amazing staff have managed this extremely well the National Curriculum is now organized on a year group basis, which is far harder to deliver in mixed age classes.

Neighbouring schools have capacity for all of the St Matthias children to be accommodated within schools that are in a stronger financial position. Sustaining the quality of education offered by our current wonderful staff team, and the continued access for pupils and their families to extended services and facilities will be increasingly difficult as budgets fall at St Matthias.

Between now and Summer 2021 there will be 20 fewer children in our school as the larger classes in Year 5 and 6 leave, and much smaller classes join us. This means the school budget will fall by at least £91,962.40 (at least 20 pupils fewer, each bringing £4598.12 a year to the school budget). This will mean significant further staff and resources reductions in future.

What will it mean for the children?

Families will be supported to move to neighbouring schools. The Local Authority recommends that the group of schools is small, to reduce distances, but also to support children to transition with other children that they know.

A full programme to support children through this difficult period will be put in place, with the aim of helping them to recognise that moving school presents new opportunities as well as celebrating how they have benefitted from their education at St Matthias. This will include open days at the nearby schools so that parents are able to visit once schools have returned after the Coronavirus epidemic.

Christ Church School governors have agreed to work in partnership to support St Matthias School. If a decision is taken, in March 2021, to close St Matthias from the end of the Summer Term 2021, as many children as possible will be accommodated

at Christ Church School, although there will not be space for all children to transfer.

The three closest schools, William Davis, St Anne's and Christ Church all have excellent reputations and the care and importance given to each individual child, is a strength of both all three schools.

Their most recent OFSTED reports can be found at

Christ Church : <https://reports.ofsted.gov.uk/provider/21/100944>

St Anne's : <https://reports.ofsted.gov.uk/provider/21/100950>

William Davis : <https://reports.ofsted.gov.uk/provider/21/100943>

Parents who wish to are able to apply for places in any Tower Hamlets School. The second closest Church of England School to St Matthias, is St John's, Bethnal Green.

What will it mean for the staff?

Staff at St Matthias School will be supported to find redeployment opportunities at other local schools, they may also have the opportunity to consider voluntary redundancy. Wherever possible Tower Hamlets tries to avoid compulsory redundancy. If the proposal does go ahead staff, and their unions, will be involved in a School Re-organisation staffing process consultation, and will receive support to help them through this transition, such as additional training.

What will happen to the school building?

At this stage of the proposal there are no specific plans for the building. These will be considered if the proposal progresses to statutory notice later this year.

Procedure to achieve the closure

It is proposed that there will be no further admissions to St Matthias School from September 2021.

All responses to this consultation will be put together in a report to governors and the Local Authority. The Local Authority will then decide, at its November 2020 meeting, whether to move to statutory notice - a formal publication of a document explaining the closure and its impact. Stakeholders are then able to make representations to the Local Authority before a final decision is reached early in March 2021.

If the proposal goes ahead and the Local Authority Cabinet does decide to close the school all the children at St Matthias will transition to new schools by September 2021, when St Matthias will formally close.

Admissions

Children will continue to be able to go to St Matthias School until July 2021. During the Summer Term 2021 the Local Authority Admissions Team will work with the school to allocate places using a parental preference system, including offering as many places as possible at Christ Church, which is the nearest Church of England

School with vacancies. Places will be allocated applying the existing Primary Admission criteria.

If parents are interested in moving their children to a different school before July 2021, they can apply using the Tower Hamlets In-Year Admissions process.

https://www.towerhamlets.gov.uk/ignl/education_and_learning/schools/school_admissions/in-year_admissions.aspx

Children should not move school, other than at the end of the school term.

Why are we consulting you?

We want to consult you to gather your views because you are part of the school community. The governing body of the schools, the London Diocesan Board and the London Borough of Tower Hamlets cannot simply decide to make changes to schools without first seeking the views of parents and others. There is a legal process which must be followed before changes can be made, and it is important that the Governing Body, the Diocese and the Council hear your views before deciding whether to proceed.

We have organised the following opportunities for staff, parents and carers to share their views.

1. You can use the response form (or any other written format) at the end of this document to record your views. It can be posted to the schools, or emailed to

consult@st-matthias.towerhamlets.sch.uk

2. There will be a box in the playground and EYFS at St Matthias School where you can leave your comments, response forms and any questions.

3. The Tower Hamlets Parental Engagement Team will set up virtual "Time to Talk" meetings towards the end of June for parents.

4. The Local Authority consultant, who is supporting the schools with the consultation process will be available for 1 to1 socially distanced questions/feedback on Wednesday 8th July from 10.15 - 2.30. You can contact St Matthias School to book a 15-minute slot.

5. Virtual meetings will be set up on July 8th:

Staff 4pm

Parents 9am and 6pm

To join them please contact the school and provide your email address so that you can be invited.

6. If you would like someone to phone you so you can discuss your views please let the school office know and provide your phone number and some times that would suit you.

7. School staff will create age appropriate ways of consulting with our children on

their views as part of their on-line teaching.

At the start of the Autumn Term governors will review the feedback received so far, and any changes in social distancing rules, so that they can decide on any further activities to take place in September. The consultation will close on September 30th.

What happens next?

The stage one consultation period starts on 8th June and ends on 30th September 2020 – the last page of this document can be used for you to feedback your view to governors and the Diocese and Local Authority. It should be returned to the school office. Following the consultation process, the Governors' Steering Group will review your feedback and use it to make a response to the council, on whether to recommend proceeding with the school closure proposal.

The Governing Body and LDBS will consider your feedback in their representations following the publication of the formal statutory notice, if the Council decide to move to this stage, at their Cabinet meeting in November 2020.

If the Council decides to proceed, a public notice (the statutory notice) will specify details of the final proposal and there will be a period of at least four weeks when representations can be made. This will be the final opportunity to make any comments on the proposal. It is then anticipated that a final decision on whether to merge the schools will be made by the council on March 3rd 2020.

How can I get more information on the proposal?

The LA will publish the feedback from this pre-publication consultation on the council's website during October 2020.

If permission is granted to publish a public notice, further details of this proposal will also be available in the Consultation sections of the Council's website

This document is also available on the school website

<https://www.stmatthiasschool.org.uk/Welcome.html>

Some short videos will be added to the website in the next few weeks, which you may find helpful for explaining the consultation, and the admissions process that will take place in the Summer Term 2021 if the Council do reach a decision to close the school.

If you have any questions at all please do either send them to the email address, or put them in the consultation box, or join one of the virtual meetings that are being set up. Please do complete the response form attached and return it to the school. The consultation will run until September 30th 2020, but we would like to receive responses before then so that we can answer as many queries and concerns as possible before the summer holidays.

Thank you for taking the time to consider our proposal, we look forward to hearing your views. We appreciate that this is a difficult time for parents, and want to hear from you, how we might be able to reduce the stress and ensure our families are able to celebrate their time at St Matthias, and be supported to move to new schools, if that is necessary, from September 2021.

St Matthias Chair of Governors

Proposal to close St Matthias School – Response Form

Our proposal is to close St Matthias School, from August 31st, 2021, to build a strong partnership, with Christ Church C of E School, and to support all St Matthias children to relocate to other schools.

We welcome your views on this proposal. Please fill in this response form and return it to the address below no later than September 2020, 3.30pm.

- 1) Do you accept the need for the proposal to close St Matthias School, and relocate children to nearby schools?

Please tick as applicable

Yes		No	
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- 2) If you like the proposal to partner with Christ Church School, please say why you think it is a good idea?

- 3) If you dislike either proposal, please tell us why you are concerned?

- 4) Any other comments, suggestions for how we can support staff, children and families or questions? Please feel free to use the other side of this paper for your comments.

- 5) Please indicate which of these bests describes your link to St Matthias School

Parent		Staff Member		Governor		Other – please specify
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(Children's views will be ascertained through age appropriate methods)

Your Name (Optional) _____

Please return this form to St Matthias School by 30th September 2020. Feedback from question one will be summarised numerically. Comments will be typed-up and anonymised. This information will be made available to the public (via the school website), but all respondents' comments and information will be anonymised.

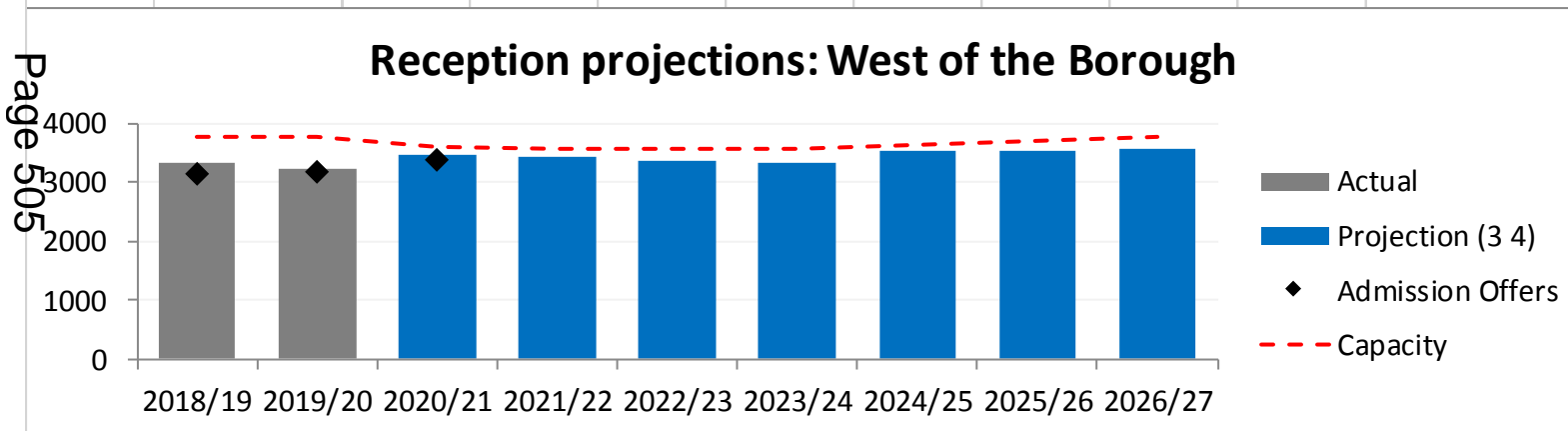
If you would like the opportunity to have a telephone conversation about your concerns, please add your phone number and dates and times that would suit you to this form. You will then be contacted by someone from the Local Authority consultation support teams.

School Roll projections for Reception

Produced June 20 using: Jan 2020 school rolls, GLA 2018-based population projection model (UPC), and Local Plan + LLDC development trajectory, High Migration 3 4 option, January 2020 Capacity

West of the Borough

	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	
Actual	1,523	-	-	-	-	-	-	-	
Projection (3 4)	-	1,691	1,650	1,604	1,596	1,675	1,659	1,650	
Admission Offers	1,540	1,590	-	-	-	-	-	-	
Capacity	1,970	1,815	1,800	1,770	1,770	1,800	1,800	1,800	
Variance (3 4)	Pupils	447	124	150	166	174	125	141	150
	FE	14.9	4.1	5.0	5.5	5.8	4.2	4.7	5.0
	%	23%	7%	8%	9%	10%	7%	8%	8%



Catchment 1 - Stepney			(INCLUDES BOTH BONNER SITES)							
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	
Actual	730	600								
Projection			734	702	682	692	723	711	704	
Admission Offers	727	630	644							
Capacity	840	840	720	720	720	720	750	750	750	
Variance	Pupils	110	240	- 14	18	38	28	27	39	46
	FE	3.7	8.0	- 0.5	0.6	1.3	0.9	0.9	1.3	1.5
	%	13%	29%	-2%	3%	5%	4%	4%	5%	6%

Catchment 5 - Wapping										
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	
Actual	418	417								
Projection			432	437	427	412	435	435	434	
Admission Offers	419	409	440							
Capacity	480	480	465	450	450	450	450	450	450	
Variance	Pupils	62	63	33	13	23	38	15	15	16
	FE	2.1	2.1	1.1	0.4	0.8	1.3	0.5	0.5	0.5
	%	13%	13%	7%	3%	5%	8%	3%	3%	4%

Catchment 6 - Bethnal Green										
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	
Actual	508	506								
Projection			525	511	495	492	517	513	512	
Admission Offers	483	501	506							
Capacity	660	650	630	630	600	600	600	600	600	
Variance	Pupils	152	144	105	119	105	108	83	87	88
	FE	5.1	4.8	3.5	4.0	3.5	3.6	2.8	2.9	2.9
	%	23%	22%	17%	19%	18%	18%	14%	15%	15%

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Summary of the School Roll Projection Methodology

Tower Hamlets Council commissions school roll projections through the Greater London Authority (GLA), like most other London boroughs. GLA have access to data on all pupils in London (via the National Pupil Database) which enables them to model movements across borough boundaries in a way that would be difficult for an individual authority.

Projections are run each year in March/April using the following methodology:

- Step 1.** The borough's population is projected based on demographic trends (e.g. births, deaths, and migration) and the borough's housing development trajectory using planning data submitted by the council.
- Step 2.** The flow of pupils from their ward of residence (including those out of borough) to each mainstream state school is determined, based on the Spring School Census and estimates of the number of children living in each ward. These are turned into ratios, for example, one in five Year 1 pupils living in XYZ Ward go to ABC Primary School. These existing ratios are not available for new children entering school in Reception, so these ratios are determined based on previous years.
- Step 3.** The number of pupils in each school is projected by multiplying the flow ratios by the populations in each ward. For example, if one in five Year 1 pupils in XYZ Ward go to ABC Primary School, and it is projected that there will be 100 Year 1 pupils in the ward, then 20 pupils from this ward are expected to go to ABC Primary. The number of pupils from each ward is then added up for each school.
- Step 4.** Projections are aggregated to catchment area and borough-level to improve reliability.
- Step 5.** Validation of pupil numbers and local intelligence checks are made against GLA projections.

Projections are run each year in March/April using information based on demographic trends (e.g. births, deaths, and migration); the borough's housing development trajectory; and the flow of pupils from their ward of residence (including those out of borough) to each school.

PAN London pupil projections are notoriously difficult to plan, given the growth experienced in recent years and all the factors contributing to current migration levels. The council uses six sets of pupil projections based on high, medium and low migration; and on a one year or four year historical reference. Historically, it considered the medium migration sets as the most reliable method as it produced a higher yield of pupil place projections consistent with the growth pattern at that time. However, recently, it was decided to change to a new model based on the high migration set, which has produced a more modest pupil growth projections in line with current trends. The council's most recent DfE return on School Capacity (SCAP) showed projections were 99.7% accurate for primary and 99.1% for secondary. This is well within the DfE's tolerances and therefore ensures confidence in the methodology and approach.

Within the Pan London context, Tower Hamlets is especially complex as it is a population dense urban area with rapidly changing demographics and huge scale development, which increases the degrees of variability to its pupil projections work. The approach is therefore to develop and present a school place planning strategy with reasonable ambition, the necessary caution and flexibility to manage these significant challenges, as well as the expectations of the various stakeholders.

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Appendix 4

St Matthias Primary School – Current Financial Position as of January 2021

Introduction.

1. School funding is allocated on a formula basis known as the National Funding Formula (NFF).
2. The majority of funding that goes through the schools NFF is 'pupil-led'. This funding is calculated based on the number of pupils in the school and their characteristics. All schools get a basic amount for each pupil (with different amounts for different ages), and extra funding for pupils with additional needs.
3. Schools also receive 'school-led' funding, based on the characteristics of the school itself. This includes a lump sum for every school, and extra funding for schools with certain characteristics, such as a school that operates across more than one site, or a school that is small and remote.
4. Absolute levels of funding per pupil are calculated using both pupil-led and school-led funding - the total funding for both pupils and the school.
5. Changes in funding per pupil are calculated using changes in pupil-led funding only - the funding that changes from year to year with pupil numbers

School Budget Share.

6. The School Budget Share is the primary source of funding for St Matthias, covering all pupils in reception to Year 6. It is predominantly pupil led; in 2019-20 the budget share was £1,357,082 of which £1,269,612 (94%) was pupil led. Changes in pupil numbers therefore have a significant impact on the funding available.
7. Recent changes in the budget share are set out in the following table.

Financial Year	Budget Share	Pupil Led	Pupil Numbers Years R-6 ⁽¹⁾
2020-21	1,188,630	1,147,624	128
2019-20	1,357,082	1,269,612	154
2018-19	1,089,694	1,092,989	163
2017-18	1,195,130	1,170,496	181
2016-17	1,271,922	1,270,854	196

(1) October census preceding the financial year.

8. The projected roll of 128 (years R to 6) for September 2021 indicates a school budget share of £1,131,828 for 2021-22. This would fall significantly in future years as larger year groups leave the school and if the fall in applications is not reversed.
9. The Tower Hamlets average budget share for a maintained primary school (excluding St Matthias) is £1,961k in a range from £859k to £3,654k. If St Matthias had full cohorts in years R to 6 at its planned admissions number its budget share would be £1,676,929.
10. In addition to the budget share the school receives early years funding (£96,401), various grants and other contributions; the majority of these funding sources are determined by pupil numbers and will fall as the roll decreases. Total income for preceding years is shown in the next table.
11. The table below shows the broadscale cumulative budget position, taking into account pupil numbers and intelligence held by the Local Authority:

St Matthias - BP	20/21	21/22	22/23	23/24
Opening Balance	47,349	-38,301	-160,985	-344,222
In year Deficit	85,650	122,684	-183,237	-171,936
Cumulative YE Bal	38,301	160,985	-344,222	-516,158

Financial Position – Prior Years.

12. The difference between the school's income and expenditure is set out in the following table.

	Income ⁽¹⁾	Expenditure	Net ⁽²⁾	Cumulative ⁽²⁾
2020-21 (Forecast)	1,188,630	1,274,280	(85,650)	(38,301)
2019-20	1,357,082	1,313,164	43,918	47,349
2018-19	1,400,785	1,388,978	11,806	3,431

(1) Figures in brackets represent a deficit.

13. The forecast in-year deficit for 2020/21 is £85,650. Regulations prevent a Local Authority (LA) from writing off school deficits so in-year balances are added to those brought forward from previous years giving a forecast cumulative budget deficit at 1 April 2021 of £38,301.

Financial Position - Future Years.

14. The Scheme for Financing Schools requires the governing body reduce the in-year expenditure so as not to exceed in-year income; in addition, further reductions are required so as to eliminate the cumulative deficit over no more than three years.

15. The school had produced a short term financial projection in Sep19 covering the financial years to 2021-22. The projected in-year deficit for 2021-22 of £5,190. The actual realised position has since worsened overtime, and with the current projection topping 85K, its hard to see how this will be stemmed given the forecast drop in pupil numbers.

Licensed Deficit Agreement.

16. A new Licensed Deficit Agreement is required with the governing body within the limits imposed by the Secretary of State and taking account of the likely future of the school. Careful monitoring of the action plan will be needed in order to safeguard the LA's financial position. If a decision is taken to close the school the action plan and monitoring arrangements will be an important element in controlling the final deficit to be met by Tower Hamlets' General Fund.

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Appendix 6

St Matthias School Public Consultation (1st Stage) Feedback Report – October 20th 2020

Report compiled by Dr Helen Jenner, Independent Consultant, Tower Hamlets Primary Review.

Introduction

This report summarises the planning undertaken to lead to a public stage one consultation, and the responses to that consultation, on whether or not St Matthias Church of England Primary School Governing Body should support the Local Authority to formally consult on the closure of St Matthias School, through the publication of a Statutory Notice (stage two). An earlier version of the report was sent to governors to support them to reach an informed decision at their meeting on October 8th 2020.

Background

St Matthias School Governing Body and the London Diocesan Board for Schools (LDBS) were prompted by the Tower Hamlets Primary Review¹ to consider the sustainability of St Matthias C of E Primary School, given its vulnerability to falling rolls. The Governing Body reluctantly reached the conclusion that to close the school and relocate children to other nearby schools would be the best solution to optimising educational provision in the area.

The Tower Hamlets Primary Review commissioned an Independent Consultant, Dr Helen Jenner, to work with schools they had identified as being at risk due to demographic change in the Borough. As well as working with the schools, Dr Jenner was asked to produce a public report “Future Ambitions”² setting out principles for developing school relationships for resilience and excellence. This document was shared with the Diocese, all Headteachers, Unions and Governors in March 2019. Regular updates on the Primary Review have been included in the termly Director’s Report for Governors, and discussed by the Primary Review Action Group (PRAG), on which the Diocese and Headteachers are represented.

Governors Planning

The governing body have met on several occasions, including directly with the Local Authority, LDBS and with the Lead Member for Children’s Services to consider the future of the school. They also sought the advice of an independent finance consultant, to explore options. They have been supported by LDBS, the Independent Consultant and Local

¹ Tower Hamlets Primary Review

https://www.towerhamlets.gov.uk/ignl/education_and_learning/schools/Primary_Review_for_parents.aspx

² The Future Ambitions Report is available on the Tower Hamlets Primary Review Website.

Authority staff to review the implications for the school, and to undertake a pre-publication consultation.

Governors and the Headteacher have met, in various groupings, regularly since the Local Authority first identified the school as being “in scope” for review, in July 2018. There have been several changes in Chair of Governors since that time, and three Headteachers. In June 2020 it was agreed that Julian Morant, the Headteacher at Christchurch would be Executive Headteacher at St Matthias, when the Acting Headteacher left to take up a post in another school.

A Governing Body meeting with governors was held on 26th May to discuss the Primary Review, the Future Ambitions Report, and the best responses for the school. The governing body agreed arrangements for informal (pre-publication) consultation on the possible closure of the school, to run from 8th June – 30th September.

Summer Term Activities

A consultation document³ was prepared, and agreed, with the Local Authority and the London Diocesan Board for Schools. This was given in paper copy to all parents, circulated to Tower Hamlets Headteachers, through the Headteacher’s Bulletin; emailed to Trade Unions, and the Secretary of State has been notified of potential changes.

Information about the consultation was also placed on the church website, because the school website was not working in the Summer Term. The link was sent to all parents. The website included a letter to parents and staff from the Chair of Governors, a copy of the consultation document, and 3 short videos explaining the situation.

Because of coronavirus open meetings were not held in the Summer Term, however a range of ways to feed into the consultation were organized:

1. A box was set up in the playground at the entrance to the school, where people could leave comments, response forms and any questions.
2. A response form (or any other written format) at the end of the consultation document to record views was able to be emailed, posted, or handed to the school.
3. A special email address was set up for comments
4. Personal phone calls were offered.
5. The Local Authority consultant was available for 1 to1 socially distanced questions/feedback on July 8th
6. Virtual “Zoom” meetings were also set up for staff and parents on July 8th

An update report was provided for the LA, Governors and LDBS on July 22nd.⁴ It also made recommendations for further consultation activities.

Autumn Term Activities.

Julian Morant took over as Headteacher at the start of the Autumn Term 2020.

³ Available on request to the school

⁴ Available on request to the school

In meetings with the Headteacher and Chair of Governors it was agreed that there should be more face to face opportunities for parents to feed into the consultation.

The following opportunities have taken place during September

1. To actively engage the parents on 8th and 10th September parents were spoken to at the school gate.

This led to discussions, questions and comments engaging 24 parents on Tuesday and 26 on Thursday. These have been included in the attached Frequently Asked Questions summary.

2. A further opportunity to attend a zoom meeting (14th September) was taken up by 4 parents.
3. Staff were offered the opportunity to attend a further zoom meeting, no-one chose to do so
4. A playground briefing meeting for parents was held Friday 18th September, at 9.15 am, attended by 14 parents and 4 staff members, and a second briefing was held on September 28th, at 2.45 pm, which was attended by 13 parents.

Questions raised in these meetings have been addressed in the attached Frequently Asked Questions summary.

5. The Headteacher has also had regular discussions with staff, and all staff have had a 1-1 meeting, with the Headteacher, to discuss their individual concerns and plans. An optional staff meeting will also be arranged for staff to hear the feedback from the pre-publication consultation.
6. Groups of parents have also visited nearby local schools.
7. SENCOs and Headteachers from the 3 closest schools have had meetings to discuss transition.
8. Parents and staff were reminded that they do have the opportunity to submit written responses.

In addition, a large number of individual queries have been addressed by Pupil Services, the Parent and Family Support Team and the Independent Consultant about admissions processes. These are not detailed in this report because they are not questions pertaining to St Matthias School. They are, however, an indicator of the anxiety that parents are feeling, despite messages of re-assurance and the guarantee of a good local school place in September 2021, if the decision is taken to close the school.

Written Responses Received

5 forms were received, all from parents, in the Summer Term.

A further 20 were received in the Autumn Term (1 parent submitted 2 forms)

8 from staff members

8 from parents
2 from members of staff who are also parents
1 Other (not specified)

5 responses accepted, or partially accepted the proposal; 1 was unsure and 18 did not accept the proposal. One parent submitted 2 forms but this has been counted as 1 response.

Of those who said no, they did not accept the proposal, reasons given were:

Children doing well/ Good school 13
Other schools too far away 4
Affect on education 7
Wasn't expected 2
Too short notice 4
Upsetting for child 5
Don't like the idea of partnership 2
Will SEN needs be met 3
Accessibility of building 3
Concern that decision is being taken because "money talks" 1
Job concerns 2
Strength of staff team 2

Across responses a number of other specific points were made:

2 said Christchurch partnership is appropriate for location reasons and because its C of E
3 felt the partnership with Christchurch is quite limited
3 asked that good support be given if children have to move school
1 asked for the proposal to be reconsidered
2 felt the decision had already been taken
1 suggested that William Davis should be closed rather than St Matthias
I felt that communication with parents has not been clear enough over last 2 years
3 were concerned that visits to local schools may have created anxiety, rather than reduced it.

In one to one discussions and meetings with parents strong support for the school has been voiced.

Parents and staff are sad that the school may close, and parents appreciate the quality of education their children have received.

Parents understood that numbers of children attending St Matthias had fallen, and have heard rumours about the future of the school, for many years. Some parents felt that communication has not been transparent, and wondered whether more could have been done in the past, although they do recognise that other schools in Tower Hamlets and across London are facing similar challenges.

Some parents wondered whether it would be possible to close other schools, rather than St Matthias, or to amalgamate schools.

Parents sought clarification on whether they should move their children now. Re-assurance was given that there are sufficient places across the 3 closest schools (William Davis, St Anne's and Christchurch) for all the children and that the Local Authority recommends that children stay at St Matthias as a decision has not yet been made. If the decision is taken to close the school children will be fully supported with a transition programme , in the Summer Term, so that they are well prepared for new schools.

Overall there is a strong commitment to the school, and sadness that it may close, however, there is also an understanding that this may happen and a desire to ensure children have the best possible year at St Matthias, and are well supported to transition to new schools, if that is required.

Feedback to stakeholders

It is recommended that this Consultation Summary and the Frequently Asked Questions document (attached) be posted on the school website and be emailed to parents, staff and other stakeholders.

Parents and staff would like to be regularly updated on next steps.

Governing Body next steps

St Matthias governing body met on September 28th to consider the feedback so far, and to raise any points they wish to include. In the consultation. In this meeting they considered the key messages from parents and staff, and the range of opportunities that have been given for feedback. They were re-assured that sufficient feedback opportunities had been given and felt that the level of response was acceptable, but this was partly because many parents were resigned to the idea, and because of the impact of coronavirus. They recognised that rumours over some time may have impacted on parents' views. They also reflected on the work they had put into considering various options over time, to make sure there was no sustainable alternative plan for the school's future.

At their quorate governing body meeting on 8th October they considered an earlier draft of this report and whether they are recommending that the Local Authority move to publish statutory notices. They unanimously concluded that they *'reluctantly agree to the LA statutory notice of closure' of St Matthias.* *" They were clear that whilst they are not in favour of closing the school, they understand that it is no longer viable and there is no alternative.*

This report will be shared with governors, the LDBS and the Local Authority.

It is recommended that it is also available for staff and parents and St Matthias to read.

A decision will be made regarding whether to the progress to statutory notices (stage two consultation) at the Council Cabinet meeting in November 2020. Parents, staff and the LDBS should be kept up to date as matters progress.

If a statutory notice is published the decisions regarding the closure of the school would be made at the Council Cabinet meeting on March 3rd 2021. The statutory notice would recommend a closure date of 31st August 2021.

St Matthias Frequently Asked Questions 20th October 2020

The questions below reflect the range of issues raised by parents, staff and other stakeholders over the period of pre-publication consultation regarding a proposal to close St Matthias School from August 31st 2021.

The consultation was open from June 8th – September 30th 3 pm.

1. Why is the proposal to close St Matthias being made?

There are too few children in the West of Tower Hamlets to fill local schools. The numbers of families choosing St Matthias has fallen so that there are now not enough children to fund the school so that it can continue to provide the quality of education and care that we have all come to experience and expect. There are other Church of England Schools close to the school so that parental choice to receive a faith education can still be met. There are also sufficient places in nearby schools for all the children to transition in Summer 2021 to schools that have higher numbers and can offer a wider range of activities and resources.

St Matthias School is not large enough to accommodate children from another school, if another school were to close.

2. When will the decision be taken?

Deciding to close a school is taken very seriously, and the decision has to be made by the Council following a statutory consultation process.

The final decision will not be taken until March 3rd 2021.

The school cannot close before August 31st 2021. It will only close then if the Council Cabinet reaches a decision to do so after it has considered all the feedback from stakeholders.

3. What arrangements will be made for our children to move schools?

If the decision is taken to close the school parents will be supported to name the schools they would prefer their children move to in the Summer Term 2021. There will be plans in place to help children transition to their new schools. The Pupil Services Team will work with parents to help them with this process, if the decision is taken to close the school.

4. Can I move my child to another school now?

Parents have the right to move their children to other schools at the end of every term. If you are considering this you need to talk to the Pupil Services Team at Mulberry Place. The Local Authority recommends allowing your children to finish this year at St Matthias, so that they can be part of a well planned transition to their new schools, and can celebrate the education they have enjoyed at St Matthias.

5. Which schools can my children go to if the school closes?

The Pupil Services Team know which schools have vacancies and in which year groups. There are sufficient spaces for all the children currently attending in St Matthias across the 3 nearest schools – Christchurch, William Davis and St Anne’s.

6. What happens if there are no spaces at the school I want my child to go to?

Just like applying for Primary or Secondary School you are able to name more than 1 school. The admissions criteria will be applied. If your child does not get a place at one of your preferred schools Pupil Services will talk to you about your options.

7. Can I visit schools to see which I like?

Yes. Open days were arranged at the 3 nearest schools. It is a good idea to go along to see what the school is like. We suggest that you go to these rather than listen to other people’s opinions.

The dates for these were:

William Davis Tuesday 15th and 22nd September

St Anne’s Wednesday 16th and 23rd September

Christ Church Thursday 17th and 24th September

There will be further opportunities for visits later in the school year. These visits were planned to be early so that parents could see the quality of the places available and would hopefully be re-assured that there is no need to panic. A good local school place is available for every child.

These visits have been set up so that you can see there is no need to worry about moving your child now – the schools are good schools and there will be sufficient places across the schools for you to make a choice if the decision is taken to close St Matthias.

8. Will St Matthias children get priority?

Children can only move into schools where there are vacancies, but Pupil Services are prioritising their support for children from schools that may be closing. They will help make sure that siblings are able to stay together.

9. Do I have to go to one of the nearest schools?

No. Parents can apply to any school where there are vacancies. If the decision is taken to close the school the Pupil Services Team will meet with parents to support them to name school preferences in the Summer Term. If parents wish to find out about options before then they will need to contact Pupil Services, themselves.

10. Do you have to be Church of England to go to Christchurch, or Catholic to go to St Anne’s?

No. Both St Anne's and Christchurch have large numbers of children from a range of faith backgrounds. Applications are welcome at all 3 nearby schools whatever your faith/background.

11. Will there be particular support for children with Special Educational Needs?

Yes. If your child has an Education, Health and Care Plan there will be an annual review meeting during the year where you can discuss with the SENCO where would be the best school to meet your child's needs, if there is a decision to close St Matthias. For each child with a plan a specific transition plan will be put in place, if needed.

12. What will happen to staff?

There will be an HR process to support staff during the closure period. Tower Hamlets and the London Diocesan Board work hard to reduce compulsory redundancy so will talk with staff, and their unions, about voluntary redundancy and redeployment opportunities.

13. When will staff know whether they have jobs from Sept 2021?

The decision on whether to close the school or not will not be taken until March 3rd 2021. The School Reorganisation Process will be put in place so that all staff will have confirmation about their future from May 31st 2021, at the latest.

14. Is the population data robust?

The data used to predict future needs comes from the Greater London Authority, but is also informed by local knowledge. We know that there have been too few children to fill school in the West of Tower Hamlets for more than 5 years, and that the birth rate in the area is not expected to go up. St Matthias has not been full in all year groups for several years, and has less than 20 children in lots of classes. Although this can seem lovely, it means the school would not be able to run individual year groups because it does not have enough children to pay for the staff needed.

The reasons for population change are complex but they include – reduction in birth rate, the impact of housing benefit caps, increasing housing costs so that families cannot afford local rents and mortgages, Brexit meaning families are not able to move to the UK easily and most recently, some families wishing to return home because they would rather be close to family during coronavirus.

It is difficult to predict exactly what the future will bring but there have always been too many spare places in the Bethnal Green area.

15. Have all funding avenues been explored?

The funding rates for schools are set by national government. They include a set amount for each school, an amount for each pupil and some additional grants to support need. The rate of the grant means that unless there are about 25 children in a class schools struggle to have enough money to provide everything they should. The Local Authority no longer has its own funding to support schools, and is not allowed to do so for more than 3 years.

Governors have looked carefully at finances and brought in external help to see if there are other alternatives. The sad fact is there are not enough children in the local school for St Matthias costs to be met.

16. Is Home Schooling an option?

Parents are able to choose to home school their children if they wish. Once children return to school fully you must put in a formal notification that this is your intention and should expect that, at some point, you will receive a visit to make sure the quality and range of provision is meeting your children's needs. The school will no longer have capacity to support you with this because their role is to teach the children attending school. More information can be found at:

https://www.towerhamlets.gov.uk/lgnl/education_and_learning/parental_support/home_schooling/home_schooling.aspx


Most children love going to school and if you are considering this option we would advise you to research the implications very thoroughly.

17. Will there be further meetings for parents?

Yes. The Parent and Family Support Team will support the school to arrange meetings (within coronavirus restrictions) to keep parents updated, and there will be regular updates in the school newsletter.

18. Will there be further meetings for staff?

Staff will be kept informed through staff meetings. The independent consultant will attend at least one of these each term so that staff are kept updated and have the opportunity to ask questions if they wish.

<p>Cabinet</p> <p>3 March 2021</p>	 <p>TOWER HAMLETS</p>
<p>Report of: James Thomas, Corporate Director, Children and Culture</p>	<p>Classification: Unrestricted</p>
<p>Report on the outcome of the statutory consultation on the proposal to make prescribed alterations to Bowden House School and Ben Jonson School to support the development of Primary SEMH provision</p>	

Lead Member	Councillor Asma Begum, Cabinet Member for Children, Schools and Young People
Originating Officer(s)	Christine McInnes
Wards affected	All wards
Key Decision?	Yes
Forward Plan Notice Published	Jan 2021
Reason for Key Decision	Outcome will be 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, and for the implementation of the SEND Strategy
Strategic Plan Priority / Outcome	Children and young people are protected so they get the best start in life and can realise their potential, SEND Strategy

Executive Summary

This report informs cabinet of the outcome of the four week period of public representation in response to the statutory notice on the prescribed alterations to Bowden House and Ben Jonson schools to enable a co-educational, integrated SEMH primary provision on the Ben Jonson site. It recommends that the Mayor in cabinet reaches a decision on specific prescribed alterations to the two schools.

Ben Jonson Proposal for a prescribed alteration to Ben Jonson School to establish an, up to 12 place, Special Educational Needs provision from September 2021.

Bowden House.

The proposal requires a “prescribed alteration” for Bowden House School to extend its age range to 5-19 and to increase its capacity by 12 pupils at the Ben Jonson site. The provision at the Ben Jonson site would be day provision only and co-educational. There will be no change to the Bowden House Seaford secondary provision.

The report (will include) includes: a summary of representations received; the council’s and schools’ response; officer’s recommendations; and the decisions available to the Mayor in Cabinet, its appendices include an Equalities Impact Assessment and information and frequently asked questions from Stage 1 consultations, which forms part of the SEMH Implementation plan, and information

on the Statutory Notices and any representations.

RECOMMENDATION:

1. Having considered the responses to statutory (public) notice at Appendix 3, the Equalities Assessment at Appendix 4 and the earlier public consultation report, Appendix 1, it is recommended that the Mayor in cabinet approves the proposal to agree the prescribed alterations to Ben Jonson and Bowden House Schools as set out in the Statutory Notices at Appendix 2

1. REASONS FOR THE RECOMMENDATION

- 1.1 The recommendation is made in order to determine the Council's response to representations received following the issuing of a statutory notice proposing the prescribed alterations in order to establish Primary SEMH provision in Tower Hamlets that meets the requirements of the SEN Strategy, the needs of local children and the SEMH Primary Implementation Plan.
- 1.2 The provision would replace the provision at Cherry Trees School with provision more closely fitting the Local Authority commitment the following principles for Primary SEMH provision.
 - access to specialist SEMH support for girls and boys in Borough
 - stronger access to the full Primary curriculum
 - stronger support to access Mainstream provision
 - better, and more flexible, transitions to the right provision to meet the needs of the child

2. ALTERNATIVE DECISIONS

- 2.1 The Mayor could decide not to agree to the prescribed alterations in which case the new provision would not be available to children should the decision to close Cherry Trees be undertaken, nor would the Local Authority be able to deliver its SEN Strategy.
- 2.2 The Mayor could decide to delay the decision on the prescribed alterations until later. However, this uncertainty would adversely impact on the provision of education for the current pupils in primary school with SEMH and would therefore not be in their best interests.

3. DETAILS OF THE REPORT

- 3.1 The report informs cabinet of the responses to the statutory notice.
- 3.2 The Mayor in cabinet is asked to consider these responses alongside the Equalities Impact Assessment, before taking a decision on whether the council should proceed with the prescribed alterations at Ben Jonson and Bowden House schools to enable the Integrated Provision at the Ben Jonson site.

4. INTRODUCTION

- 4.1 Following a report to Cabinet on 24th November 2020, the Mayor agreed for the council to proceed with the issuing of a statutory notice on the proposal to close The Cherry Trees Special School. The main facts on the background to this decision and current position of The Cherry Trees are set out below, with the detailed information in the earlier public consultation paper (Appendix 3) and the November cabinet report. The report references the proposed integrated new provision at Ben Jonson site.
- 4.2 As part of the SEMH Implementation Plan and SEND Strategy invitations were sought in July 2020 for schools interested in running a 24 place new integrated co-educational primary provision.
- 4.3 The successful expression of interest was a proposal for an integrated provision run by Bowden House Special School and Ben Jonson Primary School at the Ben Jonson school site.
- 4.4 The two schools, with Local Authority support, have completed a Stage One consultation (Appendix 1) and Statutory Notices have now been published, the deadline for representations was February 8th 2021.
- 4.5 The dovetailing of the timetable for the two reports will allow prescribed alterations for the new provision to be considered alongside the Cherry Trees closure proposal. If the Cherry Trees proposal is agreed smooth transitions for any children at Cherry Trees for whom either provision at the Ben Jonson site would be appropriate, can be secured for September 1st, 2021.

5. BACKGROUND

- 5.1 The Cherry Trees Special School, in Campbell Road, Bow, E3, is one of six special schools in Tower Hamlets. It is a local authority maintained school providing places for up to 26 primary school age boys (currently 9 on roll) with social, emotional and mental health (SEMH) difficulties.
- 5.2 In recent years The Cherry Trees has encountered a number of challenges, culminating in an 'inadequate' Ofsted Inspection rating (Nov 2019), which deemed that its provision was no longer effective or fit for purpose. The Local Authority (LA) has since been proactively working with the School to seek to bring about its improvement. This work, alongside the development of the LA SEND Strategy and the recommendations from a recent SEMH review, has determined that the School should be replaced with alternative provisions that would be better for children and would cost less, enabling SEND resources to be used efficiently with more effective results.
- 5.3 The LA is currently planning for the first of these provisions to be in place from as early as September 2021. It will be a specialist SEMH Resource Base within Ben Jonson Primary School, working in alliance with Bowden House Secondary SEMH School. This new facility will provide more inclusive provision and also extend the range of options to meet the diverse needs of vulnerable children who are able to access a mainstream curriculum, albeit with significant modification, support and

intervention. This approach is in line with the key objectives of the LA's SEND strategy.

6. REASON FOR THE RECOMMENDATION TO MAKE PRESCRIBED ALTERATIONS TO BEN JONSON AND BOWDEN HOUSE SCHOOLS

- 6.1 Full consideration has been given to the wellbeing of the school community, including pupils, families and staff, at Cherry Trees and the support they will require if the recommendation for closure is approved. Approving the prescribed alterations in place will ensure that alternative provision would be available at the Ben Jonson site, where parents wish to access it, and the children will still be primary age.
- 6.2 There are a number of children in Tower Hamlets whose SEMH needs are not currently being fully supported, and some who have been placed outside of the Borough because placements at Cherry Trees have not been appropriate.
- 6.3 Careful consideration has been given to the Ben Jonson school community responses to Stage One consultation and the Statutory Notice have been overwhelmingly positive. A summary of responses has been presented to the Steering Group (Feb 8th) for the provision and to both schools' governing bodies (Feb 9th and Feb 11th). Both schools have significant successful experience and have a strong reputation for inclusive practice. The provision will be a strong resource for the whole of Tower Hamlets.
- 6.4 An Equalities Impact Assessment (EIA) has been undertaken and is presented in the supporting documentation (Appendix 4). Although there are some groups who are considered more vulnerable the EA explains how the risks are being mitigated.

7. CONSULTATION

- 7.1 The first stage of the public consultation process began with the Revised SEN Strategy in January and the SEMH implementation plan in June and July. It was also linked with the Cherry Trees consultation process which was undertaken from 14th September to 19th October 2020. An analysis of the responses to the first stage consultation was presented to the Mayor in cabinet on the 24th November 2020. Parents and staff at Ben Jonson and Bowden House Schools have also contributed to the Stage One Report (Appendix 1). Statutory Notices were published on January 11th. They are included in Appendix 2, along with a feedback report.
- 7.2 The statutory notices took into account the guidance in Annex A of the DFE Guidance (2018) for prescribed alterations that "the proposal should be accessible to all interested parties and therefore use "plain English" ". In addition, because the provisions are linked to the closure of Cherry Trees Opening and Closing Maintained Schools guidance was followed.
- 7.3 Due to coronavirus it was not possible to hold the traditional method of public and parents' meetings for both the first stage consultation and the subsequent statutory notice period. However, several alternative methods were used, in line with the Tower Hamlets guidance on public consultation processes during coronavirus. These methods along with the type of responses are explained in the first stage consultation report (see Appendix 1).

- 7.4 Prior to the start of the consultation, the Local Authority's independent consultant held a series of preparatory meetings with Bowden House and Ben Jonson Schools' Governing Bodies as well as Cherry Trees School Governors and staff to discuss the background and process for the consultation.
- 7.5 A joint steering group from Ben Jonson and Bowden House Schools has been set up through a Memorandum of Understanding to help establish the new provision and oversee consultation and preparation, to ensure excellence.
- 7.6 Cherry Trees School held individual meetings for families who may wish to consider the Ben Jonson site provision to be named on the EHC Plan for their child. They were also sent copies of the Statutory Notice for the two schools, as well as the Cherry Trees Statutory Notice.
- 7.7 Statutory Notices were posted at all 3 Ben Jonson entrances and posted on Ben Jonson and Bowden House websites. They were included in the Director's Bulletin for Headteachers and sent to Chairs of Governors and other stakeholders.

Staff Meetings have been held at both schools

A series of 6 zoom meetings were held on 1st – 5th February 2021 with the independent consultants and representatives from the two schools governing bodies. At these meetings the requirements of Annex A from DFE Guidance, Making Prescribed Changes were outlined for attendees. 46 people attended these meetings.

In addition, 2 written representations were received, both fully supporting the proposals. One asked whether there would be a proposal for secondary girls in the near future.

Appendix

- 7.8 A draft Service Level Agreement (Appendix 5) has been agreed in principle by Bowden House and Ben Jonson governing bodies. Staff from Ben Jonson and Bowden House have begun planning with Cherry Trees to support any transitions, should the closure of Cherry Trees be agreed.
- 7.9 Views expressed by pupils and parents from Cherry Trees, who may transfer to the new provision, have been captured in the annual reviews of their Education Health and Care Plans (EHCPs).
- 7.10 Governors at Bowden House, Ben Jonson and Cherry Trees Schools have considered the prescribed alterations guidance and ran consultations to ensure all aspects of Annex A (DFE Making Significant Changes 2018) and, because the proposal is linked to the closure of Cherry Trees, the 2019 DFE guidance on open and closing maintained schools was followed.
- 7.11 Governors and staff from all three schools attended zoom meetings and expressed unanimously positive views on the provision. Parents from Bowden House and Ben Jonson School also attended and were very positive about the provision, as were 2 Cherry Trees parents. One parent was concerned about friendship groups for her child, at Ben Jonson.
- 7.12 Having considered all the responses at Stage One, and to the Statutory Notice, governors at Ben Jonson and Bowden House believe that the Local Authority

should agree the prescribed alteration proposals. This will give re-assurance to parents at Cherry Trees School and opportunities for children throughout the Borough. This will be supportive for all Tower Hamlets Schools.

7.13 Governors and the Local Authority have agreed draft implementation plans and value for money financial arrangements, which will be funded through the High Needs DFE funding block.

7.14 Pupils at Ben Jonson will be given the opportunity to discuss the new provision in assemblies and their classes when the school fully re-opens.

8. RESPONSES TO THE STATUTORY NOTICE (Second Stage Consultation)

8.1 The statutory notice period provided a further opportunity to engage with stakeholders and obtain their views. This followed on from the earlier first stage consultation, the feedback from Cherry Trees was reported to the 24th November 2020 Cabinet meeting and to Bowden House and Ben Jonson Governing Body meetings on January 4th, supplemented with feedback from the prescribed alterations consultation and is included again with this report as Appendix 1.

8.2 2 written representations were received in response to the statutory notice, they were both extremely positive about the new provision. All zoom meetings were also very positive.

8.3 The further period of public consultation did not result in any representation that would give cause for the Local Authority not to make the prescribed alterations so that Ben Jonson and Bowden House Schools can deliver the new provision from September 2021.

9. TIMETABLE FOR IMPLEMENTATION OF PRESCRIBED ALTERATIONS

9.1 If the decision is made to approve the prescribed alterations, the timetable for implementation will be as follows:

May 2021	Formal sign off of Service Level Agreement (Appendix 5) for new provision
April - July 2021	Development of new provision, including base line research, recruitment and transition planning
September 2021	The 24 place Primary SEMH Integrated provision will be established at the Ben Jonson site consisting of a 12 place mainstream provision with specialist support and a 12 place specialist provision, with integrated governance. In order to fully support transition and integration the provision is expected to gradually increase to its full capacity over a three year period.

10. EQUALITIES IMPLICATIONS

10.1 An Equalities Assessment has been conducted by the LA and is attached at Appendix 4. This must be considered in detail before the Mayor in Cabinet considers the matters above, as part of his decision on whether to close the School.

10.2 The Equality Act 2010 requires the LA, when exercising its functions, to have due regard to eliminate discrimination, harassment, victimisation; advance equality of opportunity; and to foster good relations between persons who share a relevant protected characteristic and those who do not (“the Public Sector Equality Duty”).

11. OTHER STATUTORY IMPLICATIONS

(i) Managing the Impact of the Prescribed Alterations on School Staff

11.1 There will be no change to the existing provision for either school so there will be no significant impact on their existing roles, other than additional responsibility for Senior Leaders.

11.2 As new roles are being created there will be a recruitment process and this may include redeployment opportunities for staff from Ben Jonson, Bowden House and/or Cherry Trees School. Governors at Ben Jonson and Bowden House Schools will consider ring fenced interviews for staff from Borough schools facing staffing reductions but wish to retain the right to appoint based on merit, to ensure excellence for the new provision.

(ii) Best Value Implications

11.3 The Local Authority has a duty to ensure that schools are fulfilling their duties and that value for public money is achieved, whilst standards are maintained. The funding envelope for the new integrated provision is expected to improve value for money from the High Needs Budget.

(iii) Environmental (including air quality)

11.4 The new provision is more centrally placed in the Local Authority so travel costs and times for children may be reduced. The schools is not directly on a main road, so air pollution is likely to be reduced compared to the Cherry Trees site.

(iv) Risk Management

11.5 If this recommendation is agreed, risks from the possible closure process at Cherry trees will be reduced. Careful planning, management and evaluation in line with statutory guidance, mindful of the needs of the children, families and staff, and thoroughly addressing the considerations of the Equalities Assessment will ensure appropriate, effective and safe provision is in place.

11.6 Building alterations will need to be in place to ensure Health and Safety both for the children attending the provision and for Ben Jonson children before the integrated provision can accommodate more than a small number of children.

(v) Safeguarding

11.7 The report deals with the Council’s approach to managing the supply of school places for the local population. The efficient supply of school places contributes to

the safeguarding of children by ensuring their access to good quality, sustainable education provision.

11.8 The SLA for the new provision includes safeguarding considerations, and the commissioning of social care support, if required, by the Local Authority.

(vi) Data Protection / Privacy Impact Assessment

11.9 The proposals presented in this report have followed an initial and formal public consultation using a variety of mechanisms. All responses received through these mechanisms or made directly to Council officers or members have been included in the analysis of the feedback received. These responses have only been used to assess the community's view of the proposals and not for any other purpose.

11.10 The Council handles information in accordance with the Freedom of Information Act 2000 and the Data Protection Act 2018 and is the data controller for the purposes of the Data Protection Act 2018. For more information, the privacy notice for Pupil Services can be accessed here.

12. COMMENTS OF THE CHIEF FINANCIAL OFFICER

12.1 Funding for the provision will come from the high needs block of the dedicated schools grant (DSG). Ensuring adequate in-house provision for SEMH pupils provides the most cost effective solution for the authority. Demand for external provision where there is a shortfall appropriate provision continues to push up prices in the external market. Working through the larger establishments of Bowden House and Ben Johnson School will ensure costs will be lower than those at the smaller provision of Cherry trees School through the benefits of shared specialist management costs. There will be available funding from the HNB if necessary.

13. COMMENTS OF LEGAL SERVICES

13.1 The procedure for making a prescribed alteration to a maintained school is set out in the Education and Inspections Act 2006, the School Organisation (Prescribed Alterations) (England) Regulations 2013 and the statutory guidance 'Making significant changes ('prescribed alterations') to maintained schools' (October 2018).

The proposals set out in this report involve making a prescribed alteration.

13.2 The guidance and regulations set out in detail the process to be followed.

13.3 The proposals in this report comply with the above legislation and guidance.

Linked Reports, Appendices and Background Documents

- **3rd March 2021 Cabinet Report – Consideration of Statutory Notice Cherry Trees**
- **24th November 2020 Cabinet Report - Outcome of the consultation on the proposal for the closure of The Cherry Trees Special School**

- 25th November Cabinet re Closure of Cherry Trees
- <https://democracy.towerhamlets.gov.uk/documents/s176275/6.4%20Report%20on%20the%20outcome%20of%20the%20preliminary%20stakeholder%20consultation%20pre-statutory%20on%20the%20proposa.pdf>
- Tower Hamlets SEND Strategy
- https://5f2fe3253cd1dfa0d089-bf8b2cdb6a1dc2999fecbc372702016c.ssl.cf3.rackcdn.com/uploads/ckeditor/attachments/6072/Draft_SEND_Strategy_2020-2024_Feb_2020_.pdf
- SEMH Update Reports
- Report to Tower Hamlets Health and Wellbeing Board January 2020. Agenda Items 4 and 5
- <https://democracy.towerhamlets.gov.uk/documents/g8995/Public%20reports%20pack%2014th-Jan-2019%2017.00%20Tower%20Hamlets%20Health%20and%20Wellbeing%20Board.pdf?T=10>
- 2019 Tower Hamlets SEMH Schooling Review
- 2020 Meeting Social, Emotional and Mental Health Needs for Primary Age Children in Tower Hamlets (SEMH Implementation Plan)

- **Appendices**

Appendix 1	Stage One Consultation Report
Appendix 2	Statutory Notices
Appendix 3	Representations Report
Appendix 4	Equalities Impact Assessment
Appendix 5	Draft SLA

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

The following document(s) has been used in the preparation of this report:

- 'Opening and Closing Maintained Schools – Statutory Guidance for Proposers and Decision- Makers' (November 2019) in conjunction with Part 2 and Schedule 2 of the Education and Inspections Act (EIA) 2006 as amended by the Education Act (EA) 2011
- The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013
- Making Significant Changes ('Prescribed Alterations) to Maintained Schools. Statutory Guidance for Proposers and decision-makers.2018

Officer contact details for documents: John O'Shea, Head of SEND
john.o'shea@towerhamlets.gov.uk

Stage One Pre-publication Consultation Summary – Feedback on a proposal to open an Integrated SEMH Provision at the Ben Jonson School site.

Report Author : Dr Helen Jenner

8th January

This is a report following a Stage 1 (pre-publication) consultation process on the possible opening of an Integrated SEMH provision at the Ben Jonson School site.

The Proposal

Following advice from Tower Hamlets Local Authority, the governors of Cherry Trees School, undertook a consultation process regarding a proposal to close Cherry Trees School, from September 2021. The Local Authority will reach a decision on that closure in March 2021. As part of the proposal the possibility of a new Integrated Provision for the LA was set out.

A review, and full consultation of, the Local Authority Special Educational Needs Strategy, recommended moving to different models of provision, which would better support academic attainment, and the inclusion of children in mainstream provision, whenever possible. In the Summer Term 2020 a primary-age Social, Emotional and Mental Health (SEMH) implementation plan was shared with schools and they were invited to comment and to put forward expressions of interest for proposed new provision. The strategy particularly recommends improvements in links to quality mainstream provision, access to the full primary curriculum and a strategic approach which fully includes girls with SEMH needs. It recommended the establishment of new integrated provision with 3 key improvement features

School were invited to submit expressions of interest to run this provision. The Local Authority met with interested parties in September 2020 and accepted a proposal from Bowden House and Ben Jonson Schools to provide an Integrated SEMH provision consisting of 12 pupils placed on the Ben Jonson school roll, and 12 pupils placed on the Bowden House roll. Governance will be through a Steering Group consisting of representatives from both school governing bodies and an LA officer, the Steering Group will report back to both School Governing Bodies.

The provision will be able to meet the needs of any children displaced from Cherry Trees School.

Cherry Trees School is a special school, catering for primary age boys with social, emotional and mental health needs aged 3 to 11 and is part of the educational provision of the London Borough of Tower Hamlets. The school is located at 68, Campbell Road, London E3 4EA.

In September 2019 OFSTED considered Cherry Trees School to be inadequate in its provision of suitable education. The school is also in financial difficulty, despite

temporarily receiving an income (2018/19) of £54,000 per pupil to help address falling rolls and the need to improve quality of education. In response to this the governing body were required to put together an action plan, and to consider the closure or academisation of the school. Considerable improvements have been made to ensure the school now offers a good quality of education, but these are not financially sustainable longer term.

Cherry Trees School is an SEMH Primary Boys School. All the pupils have EHC Plans and, because of this, individual work to discuss the children's needs as part of their Annual Reviews has been underway over the last year. The families of children attending Cherry Trees School have received individual support to consider how best to improve educational provision for their children, and to support their children's transition to better provision, through reviews of Education, Health and Care Plans (EHC Plans), and Christine MacInnes also met with parents and staff in March 2020, to ensure they were aware of the proposals. Parents were very clear that they would expect a suitable alternative to be provided by the Borough.

The consultation with Cherry Trees staff and pupils commenced in September 2020.

Governors and Senior leaders at Ben Jonson and Bowden House have been refining plans since July 2020 and have now reached broad agreement with the Local Authority on a Service Level Agreement. As well as holding Governing Body and Staff meetings they have written to their own parents and staff to inform them of this and to ask for any comments before they move to statutory notices to make the necessary prescribed alterations to their existing schools. The Frequently Asked Questions as a result of their consultation are attached to this report and available on both schools' websites.

This report

This report provides a summary of the Stage 1 pre-consultation responses.

It has been compiled by Dr Helen Jenner, an independent consultant. As well as summarising responses the report also makes suggestions on next steps for the school staff, governors and Local Authority (LA) to consider, to ensure they are responding to any concerns, issues and ideas raised by respondents.

Attached to the report is a Frequently Asked Questions (FAQ) Document. This should be read in partnership with the report.

Copies of written responses received are available at the schools, and should be retained for 12 months.

Stage One : Pre-Statutory notice activities

A Primary SEMH Implementation Plan was shared with all schools and stakeholders in the Summer Term 2021. Positive feedback was returned to the Local Authority, including expressions of interest in leading on providing a new provision to address the identified weaknesses in current LA SEMH Primary provision.

A consultation document was agreed with governors, produced and shared with staff, parents and other stakeholders at Cherry Trees School. Comments and feedback on the documents and proposal were invited between 14th September and 19th October 2020.

The document detailed the following opportunities for staff, parents and carers, and

other stakeholders, to share their views.

1. A response form (or any other written format) to record their views which could be posted to the school, hand delivered or emailed to Consultation@cherrytrees.org
2. A box was provided in the reception of Cherry Trees School where anyone could leave comments, response forms and any questions.
3. Individual meetings were held with parents. Parents were also contacted by the Home-School liaison team, who checked whether parents wanted to meet to discuss the consultation document.
4. A meeting for staff was held on September 30th at 3.30, there will be zoom access if staff cannot attend. There was also the opportunity to feed back to Helen Jenner via zoom, on October 1st at 4pm
5. Two open zoom sessions were available for any stakeholder (parents, staff community, other schools etc.) on October 1st at 3pm and 6pm.
6. School staff will create appropriate ways of consulting with our children on their views as part of their ongoing teaching.
7. Governors have fully discussed the proposals at two governing body meetings (9th September and 21st October)
8. The document was circulated to Headteachers, governors and other stakeholders.

Cherry Trees Written responses

11 written responses were received

3 responses did not indicate the background of the respondent

3 were from parents/foster carers

1 current staff member

2 were from ex-staff members

1 ex – carer

1 local resident

No written respondents were in support of the proposal to close the school and to relocate children to schools that will better meet their needs.

5 respondents confirmed they had seen the SEND Strategy, and 2 further responses indicated familiarity with the document. 4 respondents stated they had not seen the SEND Strategy. Whilst there is recognition of some of the issues identified in the strategy, some people felt it was written by people who did not understand children's needs, or recognize the work of Cherry Trees School and that it may not have been

sufficiently widely consulted on.

Some people were not aware that suitable alternative SEMH provision had been established, and concerned that this could potentially lead to high cost placements in independent provision.

The need to meet the needs of girls, to provide access to the full primary curriculum and a continuum of provision was recognised. Some people felt that a Primary PRU would be the answer.

Since then, there has been further development of the Integrated Provision model and this has been discussed in detail with relevant parents at Cherry Trees, the parents recognize the provision to be suitable, although one boys' family are concerned that he may not find a suitable friendship group at the integrated provision.

In addition, parents, governors and staff at Ben Jonson and Bowden House Schools have been asked their opinion on the proposed Integrated Provision.

Each of the aspects of the pre - publication consultations will feed into Cherry Trees, Ben Jonson and Bowden House Governors' decisions whether to move to Statutory Notices with LA support.

Key Issues raised during the Stage One consultation.

An FAQ document gave a more detailed summary of the issues and concerns of Cherry Trees respondents, the full document is available from Cherry Trees. Elements of particular relevance to the new ISP are attached.

Staff and parents were concerned that although suitable new provision has been identified for most children this has not yet been agreed for every child. The school leadership has been working with parents, local authorities, and other providers to ensure strong placements are available.

The strength of the new provision at Ben Jonson, supported by Bowden House is welcomed by Cherry Trees governors and should re-assure parents and staff that there will be appropriate local provision. Some respondents remain concerned that there may not be sufficient SEMH Primary provision in the Borough.

Most Cherry Trees respondents were keen to ensure the best possible transition for children currently attending Cherry Trees, and to secure new provision that was at least as good as the support they currently receive. It will be important for everyone to work together to ensure EHC Plans are fully able to be delivered at new provisions.

Parents, staff and governors from Ben Jonson and Bowden House raised the following points:

- They were excited by the proposal, and the opportunities it brings to support the Tower Hamlets community, and provide staff development and additional expertise at the existing provision, but concerned to ensure:

That the level of funding per child is sufficient to ensure success;

That funding and advice and development for the new provision should not be at the detriment of existing outstanding provision at either school;

That funding (both revenue and capital) should be available from April 1st 2021 to ensure a strong transition model, particularly for children currently at Cherry Trees.

That funding (revenue and capital) should be fully reviewed in Year 2 as there are concerns that Year 3 funding may be insufficient to meet the needs of children if the provision is full.

- Moving to prescribed alterations must not preclude governors' decisions on agreeing the commissioning SLA and funding proposal.
- That the prescribed alterations must not affect existing pupils at either school, nor should any changes be made to secondary provision at Bowden House
- Parents and staff at Bowden House sought re-assurances that the secondary provision would not be altered.
- Staff raised concerns that the enrolment of any new pupils would be staggered so that their transition could be well supported, and they could be properly helped to understand the expectations, values and vision at Bowden House School and Ben Jonson School.
- As the Ben Jonson element of the provision is a fully integrated model there are concerns that placements may not be appropriate to meet children's needs if there are more than two children in each year group.

Overall Recommendation

Responses show that plans for the ISP are appropriate but there are still a number of concerns from all groups. None of the issues raised would present a reason not to progress to statutory notice, but further communication with all stakeholders will be important to aid understanding of the detail of provision and ensure that governors, parents, staff and children feel well supported.

Early visits to potential new provision would greatly re-assure families.

Each young person should have a clear transition plan before the Local Authority is able to take a final decision on whether, and when Cherry Trees School should close. This will be essential for ensuring the LA meets its statutory SEN duties.

Governors at Ben Jonson and Bowden House met on 4th Jan. They considered an early draft of this report and current feedback. They raised some additional feedback as part of the consultation process.

They agreed that, they wish to progress, with LA support, to the Stage 2 consultation, the publication of a Statutory Notices.

Draft Statutory Notices will be circulated to Ben Jonson and Bowden House governors alongside this report. As parents and staff at Bowden House and Ben Jonson have been given until January 8th to respond governors received updated, final reports on 8th January, so that Chairs of Governors could be assured these have been addressed in the Statutory Notice considerations.

Governors at all 3 schools will not be reaching any decisions on whether they would recommend the Local Authority support the prescribed alterations until they can meet to consider any representations received. The governors at Ben Jonson and Bowden House Schools are also clear that supporting the prescribed alterations is not the same as confirming their agreement to the provision being commissioned, this will be dependent on consideration of the final commissioning SLA and funding agreement.

The statutory notices are necessary because both schools will need to make “prescribed alterations” if they are to deliver the ISP.

As the ISP is being developed in response to the SEND Strategy, the Primary SEMH Implementation Plan and the Cherry Trees possible closure the Local Authority will reach a decision regarding the planned prescribed changes alongside the Cherry Trees closure at its Cabinet meeting on March 3rd.

The Statutory Notices will be published for a 4 week period, and responses to them will be included in a Statutory Notice feedback report, alongside this Stage One consultation report, as part of the papers presented to the Council Cabinet. Governors at Ben Jonson and Bowden House Schools are expecting to consider the Statutory Notices Representations at meeting during the second week of February.

Bowden House School Full Statutory Notice

Introduction

On Monday 4th January Bowden House Governing Body, with Tower Hamlets Local Authority support, approved the recommendation to publish a **Statutory Notice** on the proposal to make a prescribed alteration to Bowden House School.

Proposal for a prescribed alteration to Bowden House School to establish a 12 place Special Educational Needs provision from September 2021

Notice is given in accordance with Section 15 of the Education and Inspections Act 2006 (as amended by the Education Act 2011) and the School Organisation (Establishment and Discontinuance of Schools) Regulations 2013 that Tower Hamlets Local Authority will decide whether to establish a 12 place SEMH provision at Bowden House Primary School.

This will be established following the implementation of the Tower Hamlets SEND Strategy and Tower Hamlets Primary SEMH Implementation Plan.

Contact details

Name and address of school publishing the proposal, with Local Authority support:

Bowden House School, Firle Road, Seaford, BN25 2JB

Name, address and category of school making prescribed alteration:

Bowden House is a 9-19 Residential Special School, catering for boys with Social, emotional and mental health (SEMH) needs . Address above

Implementation

Date on which it is proposed to extend the Special Educational Needs (SEND) provision as part of an integrated provision at the Ben Jonson School site:

September 1st 2021

Reason for Establishing SEMH provision

The governing body of Bowden House School, in partnership with Tower Hamlets Local Authority, has expressed an interest, and been accepted to, develop proposals to address the Tower Hamlets SEND Strategy and Primary SEMH Implementation Plan. To achieve this a prescribed alteration is necessary for Bowden House Primary School to part of an Integrated 24 place Primary SEMH provision at the Ben Jonson site. Up to 12 pupils at the site will be on the Bowden House school roll.

The council's education policy is to move towards integrated specialist provision, where appropriate and matched to pupils needs. The Local Authority SEND review made clear that the following aspects of current primary provision needed alteration

- There is currently no specialist SEMH girls' primary provision in Tower Hamlets
- The current SEMH Primary boys' provision does not offer sufficient access to the curriculum
- The current SEMH provision does not offer sufficient flexible of provision to quickly meet children's needs, particularly within an inclusive continuum offering access to mainstream provision, where appropriate.

Bowden House School have worked with Ben Jonson School to develop a proposal that would address these issues, that would also provide an alternative top quality provision should the decision be taken to close Cherry Trees School.

Pupil Numbers and Admissions

The numbers for whom provision is currently made at the school: 38

Bowden House is a residential provision for boys with EHCP plans that identify SEMH Needs.

In the September Census 2020 34 boys attended the school, with an additional 4 children post 16. There will be no change to the number of secondary age boys attending.

The change in age range will increase co-educational primary provision by 12 children (35%)

Displaced Pupils

This proposal forms part of a newly commissioned provision, and therefore no pupils will be displaced. If approved the provision would be suitable for pupils who might be displaced if Cherry Trees School were to be closed.

There will be no change for secondary age pupils based at Bowden House School in Seaford.

Impact on the Community

The proposal would improve provision for the Tower Hamlets community in line with the Tower Hamlets SEND Strategy. Therefore, it is not anticipated that there will be any adverse impact on the community, rather that the community will benefit from enhanced provision.

Rural Primary Schools

Not applicable

Balance of Denominational Provision

Not applicable

Nursery Provision

Not applicable

Sixth Form Provision

Not applicable

Special Educational Needs Provision

There are 38 secondary age boys on roll at Bowden House who have an Educational Health and Care Plan. They will not be affected by these alterations.

The provision would address the Borough's SEND Strategy and increase the level of suitable provision for children in Tower Hamlets with SEND needs.

Travel

No change for Bowden House secondary age pupils.

As the Integrated Provision at Ben Johnson School is centrally placed in Tower Hamlets (.5 mile from Mile End) the furthest Tower Hamlets Primary School from the provision is 3.4 miles. Any child living more than 3 miles from the school would have access to Local Authority Travel support and EHCPs naming the provision would give due consideration to travel needs.

Finances

If the changes are made, the Local Authority would commission provision through a Service Level Agreement. Funding would be to Bowden House School.

Procedure for Making Representations (objections and comments)

Within four weeks from the date of publication of this statutory notice, any person may object to or make comments on the proposal by:

By email: admin@bowdenhouse.towerhamlets.sch.uk
Or consult1@benjonson.towerhamlets.sch.uk
cc. school.organisation@towerhamlets.gov.uk

By post: Bowden House School, Firle Road, Seaford, BN25 2JB
Or Ben Jonson School, Harford St, Mile End, London E1 4PZ
Or School Organisation and Place Planning Manager
Pupil Services and School Sufficiency, Tower Hamlets Children and Culture, Town Hall, Mulberry Place, 5 Clove Crescent, E14 5BG

Bowden House and Ben Jonson parents and school staff will also be given the opportunity to attend virtual meetings during the Statutory Notice period.

Closing date for responses is 5pm, Monday 8th February 2021

We will not be able to consider any responses received after this date. A report considering all responses received during the representation period will be published on the Council's website in late February 2021, as part of papers to Cabinet. The report will also be available on the School's website.

The website addresses are:

<https://bowdenhouse.school>

<https://www.benjonson.towerhamlets.sch.uk>

<https://www.towerhamlets.gov.uk/>

Ben Jonson School Statutory Notice

Introduction

On Monday 4th January Ben Jonson Governing Body, with Tower Hamlets Local Authority support, approved the recommendation to publish a **Statutory Notice** on the proposal to make a prescribed alteration to Ben Jonson School.

Proposal for a prescribed alteration to Ben Jonson School to establish an up to 12 place Special Educational Needs provision from September 2021

Notice is given in accordance with Section 15 of the Education and Inspections Act 2006 (as amended by the Education Act 2011) and the School Organisation (Establishment and Discontinuance of Schools) Regulations 2013 that Tower Hamlets local authority will decide whether to establish a 12 place SEMH provision at Ben Jonson Primary School.

This will be established following the implementation of the Tower Hamlets SEND Strategy and Tower Hamlets Primary SEMH Implementation Plan.

Contact details

Name and address of school publishing the proposal, with Local Authority support:

Ben Jonson School, Harford St, Mile End, London E1 4PZ

Name, address and category of school making prescribed alteration:

Ben Jonson is a 4-11 Primary School. Address above

Implementation

Date on which it is proposed to establish the Special Educational Needs (SEND) provision:

September 1st 2021

Reason for Establishing SEMH provision

The governing body of Ben Jonson School, in partnership with Tower Hamlets Local Authority, has expressed an interest and been accepted, to develop proposals to address the Tower Hamlets SEND Strategy and Primary SEMH Implementation Plan. To achieve this a prescribed alteration is necessary for Ben Jonson Primary School to establish an up to 12 place Primary SEMH provision.

The council's education policy is to move towards integrated specialist provision, where appropriate and matched to pupils needs. The Local Authority SEND review made clear that the following aspects of current primary provision needed alteration

- There is currently no specialist SEMH girls' primary provision in Tower Hamlets
- The current SEMH Primary boys' provision at Cherry Trees School does not offer sufficient access to the curriculum
- The current SEMH provision does not offer sufficient flexible of provision to quickly meet children's needs, particularly within an inclusive continuum offering access to mainstream provision, where appropriate.

Ben Jonson School have worked with Bowden House School to develop a proposal that would address these issues, that would also provide an alternative top quality provision should the decision be taken to close Cherry Trees School.

Pupil Numbers and Admissions

The numbers for whom provision is currently made at the school:

Ben Jonson is a co-educational mainstream Primary School for pupils aged four to eleven with an adjacent Nursery provision at Harry Roberts Nursery School. Ben Jonson School provides for children from four years old. The school has a Published Admission Number (PAN) of 90 for each year group. As at September 2020 the school had 584 pupils on roll.

Displaced Pupils

This proposal forms part of a newly commissioned provision, and therefore no pupils will be displaced. If approved the provision would be suitable for pupils who might be displaced if Cherry Trees School were to be closed.

Impact on the Community

The proposal would improve provision for the Tower Hamlets community in line with the Tower Hamlets SEND Strategy. Therefore, it is not anticipated that there will be any adverse impact on the community, rather that the community will benefit from enhanced provision.

Rural Primary Schools

Not applicable

Balance of Denominational Provision

Not applicable

Nursery Provision

Not applicable

Sixth Form Provision

Not applicable

Special Educational Needs Provision

There are 29 pupils on roll at Ben Jonson who have an Educational Health and Care Plan. Ben Jonson Schools has fully accessible buildings. The provision would address the SEND Strategy and increase the level of suitable provision for children in Tower Hamlets with SEND needs. Up to 12 pupils with EHCPlans identifying SEMH needs could be placed at the school.

Travel

Not applicable for Ben Jonson pupils.

As Ben Jonson is centrally placed in Tower Hamlets (.5 mile from Mile End) the furthest Tower Hamlets Primary School from the provision is 3.4 miles. Any child living more than 3 miles from the school would have access to Local Authority Travel support and EHCPs naming the provision would give due consideration to travel needs.

Finances

If the changes are made, the Local Authority would commission provision through a Service Level Agreement. Funding would be to Ben Jonson School.

Procedure for Making Representations (objections and comments)

Within four weeks from the date of publication of this statutory notice, any person may object to or make comments on the proposal by:

Email: consult1@benjonson.towerhamlets.sch.uk

cc

school.organisation@towerhamlets.gov.uk

Post: Ben Jonson School, Harford St, Mile End, London E1 4PZ

Or School Organisation and Place Planning Manager
Pupil Services and School Sufficiency
Tower Hamlets Children's Services
Town Hall
Mulberry Place
5 Clove Crescent
E14 5BG

Ben Jonson parents and school staff will also be given the opportunity to attend virtual meetings during the Statutory Notice period.

Closing date for responses is 5pm, Monday 8th February

We will not be able to consider any responses received after this date. A report considering all responses received during the representation period will be published on the Council's website in late February 2021, as part of papers to Cabinet. The report will also be available on the School's website.

The website addresses are:

<https://www.benjonson.towerhamlets.sch.uk>

<https://www.towerhamlets.gov.uk/>

BEN JONSON AND BOWDEN HOUSE CONSULTATION

*Feedback from Statutory
Notices Publication*

Jan 8th – Feb 8th 2021

THE
STATUTORY
NOTICES
COVER THE
FOLLOWING
PRESCRIBED
ALTERATIONS

- A proposal for a “prescribed alteration” for Bowden House School to extend its age range to 5-19 and to increase its capacity by 12 pupils at the Ben Jonson site. (Change in number of pupils in a Special School of more than 10% and Change of Age Range)
- In addition, “prescribed alterations” are being considered to allow:
 - the Bowden House provision at the Ben Jonson School site to be day provision, not residential. The secondary provision will remain predominantly residential;
 - and that the Bowden House primary provision will be co-educational. The secondary provision (at Seaford) will remain boys only.
 - Proposal for a “prescribed alteration” to Ben Jonson School to establish an up to 12 place Special Educational Needs provision from September 2021

STATUTORY NOTICES REGARDING THE PROPOSALS

These were sent to parents and staff at Ben Jonson, Bowden House and Cherry Trees Schools.

They were included in the Headteacher's Bulletin for Schools and published in the East London Advertiser.

They were posted outside the 3 entrances to Ben Jonson School

They were sent to stakeholders including the Diocese, East London Mosque and Neighbouring Boroughs.

6 zoom meetings were held (2 for parents, 2 for staff and 2 open meetings).

36 people attended (some attended more than 1 meeting)

WHO ATTENDED ZOOM MEETINGS?

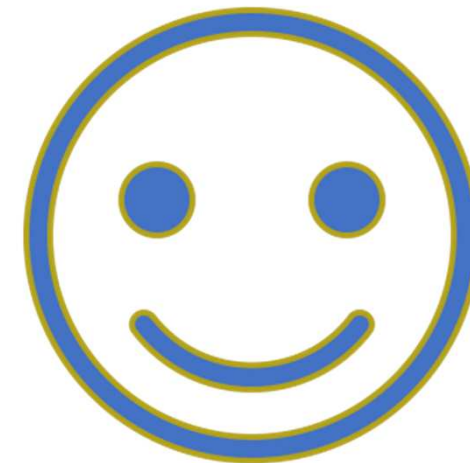
	Staff	Parents	Governors	Total
Bowden House	6 (inc 3 govs)	1 (also gov)	3	10
Ben Jonson	24 (inc 3 govs)	4	2	30
Cherry Trees	6 (inc 1 gov)			6

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2 representations were received, both from governors – 1 from Ben Jonson, 1 from Bowden House. Both were fully in support of the proposals.

SUMMARY FEEDBACK FROM BOWDEN HOUSE

Staff	Feel schools share same ethos	Confident standards wont slip	Funding is manageable for now but Review after 2 and 3 years will be essential.	Bowden Seaford children will also benefit as experience opportunities reading with younger children etc	BJ children will benefit more widely possible trips to Bowden
Govs	Exciting, innovative project	Delighted to see two inclusion committed school coming together for the community	More confident now about funding	Good to have a base in Tower Hamlets	
Parent	Good to see school being recognised as experts	Will the schools work well together	Sounds like really good provision, pity there couldn't be a link to mainstream in East Sussex		



SUMMARY FEEDBACK FROM BEN JONSON

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Staff	Still some work to do to ensure the buildings support the provision well	Want to make sure the balance of numbers is right so that children continue to be well integrated	Will there be more children in the older years?	What support will children get to move to Ben Jonson, and preparation for teachers to meet their needs?	What are the benefits for BJ children?
Govs	Really positive for whole Tower Hamlets community	Good to see the two schools coming together to address gaps in SEMH provision	Pleased LA have funded generously	Proud we are developing world class provision	
Parent	Positive for Ben Jonson	What help will there be for teachers and children?	How will it work having 2 schools?		

SUMMARY FEEDBACK FROM CHERRY TREES

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Staff	Will children be supported with transition?	Will there be specialist provision?	Will the buildings be fit for purpose?	Will there be job opportunities for Cherry Trees staff?	What will be different from Cherry Trees?
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WRITTEN REPRESENTATIONS

(2)

- Strongly in support of the proposal which will clearly really meet the needs of some of the most vulnerable children in Tower Hamlets
- Both schools are in an excellent position to work together in partnership to provide a truly outstanding integrated provision for children with SEMH needs.
- Inclusive approach , pleased that parents at Bowden House Seaford, and Ben Jonson primary have been re-assured that this will bring benefits for everyone, and that the quality of their current provision will be protected and enhanced.
- Now that specialist provision for girls with SEMH needs has been addressed at primary level I would be interested to hear what is planned for secondary age girls as it would not be appropriate for Bowden House to have girls at the Seaford site.
- Impressed with the development of the proposal including care taken to ensure it is sufficiently funded.
- Looking forward to continuing to be involved in this development

GOVERNORS' CONSIDERATION OF REPRESENTATIONS

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- The Provision's Steering Group considered the feedback from the Statutory Notices in a meeting on the evening of February 8th.
- Bowden House Governing Body considered the responses on February 9th.
- Ben Jonson Governing Body considered the responses on February 11th.

All 3 meetings recognised the very positive response to the Statutory Notices and recommend that the Local Authority agree the prescribed alterations.

These changes will enable significant progress to be made to implement the Local Authority SEND Strategy.

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Equality Impact Analysis: (EIA)

Section 1: Introduction

Name of Proposal: Prescribed alterations to Bowden House School and Ben Jonson School in order for them to develop an integrated, 24 place, co-educational SEMH primary provision, as part of an Integrated Provision which will be developed at Ben Jonson School site.

For the purpose of this document, 'proposal' refers to a policy, function, strategy or project)

Service area & Directorate responsible Pupil Services, Children & Culture

Name of completing officer: John O'Shea

Approved by Director/Head of Service: Christine MacInnes

Date of approval:

Conclusion - To be completed at the end of the Equality Impact Assessment process

This summary will provide an update on the findings of the EIA and what the outcome is. For example, based on the findings of the EIA, the proposal was rejected as the impact on a particular group was disproportionate and the appropriate mitigations in place. Or, based on the EIA, the proposal was amended and alternative steps taken)

Based on the findings of this EIA, moving to agree the prescribed alterations would reduce inequalities in Tower Hamlets by ensuring primary age girls, as well as boys, have access to specialist Social, Emotional and Mental Health (SEMH) provision. The proposal is therefore given a GREEN rating.

The new provision is expected to improve opportunities for children with SEMH needs ensuring improved access to a full curriculum.

The proposal will be recruiting staff, which should reduce the risk of redundancy for staff from other schools in Tower Hamlets where staffing is being reduced, through re-organisation and closure.

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to: Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act

Advancing equality of opportunity between those with 'protected characteristics' and those without them

Fostering good relations between those with 'protected characteristics' and those without them

Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.

This Equality Impact Assessment provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above, for more information about the Council's commitment to equality please visit the Council's website.



Section 2 – General information about the proposal

Provide a description of the proposal including the relevance of proposal to the general equality duties and protected characteristic pursuant to Equality Act 2010.

Planning for School Places – Establishing an Integrated co-educational primary provision for children with Social, Emotional and Mental Health (SEMH) Needs

This Equality Impact Assessment concerns the proposal to make prescribed alterations to Bowden House School and Ben Jonson School in order for them to develop an integrated 24 place, co-educational SEMH primary provision on the Ben Jonson School site.

Bowden House Special School is currently a 9-19 residential boys' secondary school. It is a Tower Hamlets School, but is based in Seaford, East Sussex.

The proposed prescribed alterations for Bowden House School are that it should:

- extend its age range to 5-19
- increase its capacity by 12 pupils at the Ben Jonson site. (Change in number of pupils in a Special School of more than 10% and Change of Age Range)
- include primary age day provision in its remit
- provide co-educational primary provision at the Ben Jonson School site

The prescribed alterations for Ben Jonson School are that it will

- establish an (up to 12 place) SEMH specialist provision

Tower Hamlets has a great tradition of excellent education; it values the important role that schools have in increasing the life chances of its children.

However, the borough has reviewed its SEND Strategy to improve the quality and range of provision, in order to optimise life chances for children with special educational needs and/or disabilities.

As part of this work a Social and Emotional Health and Wellbeing Primary Implementation Plan has been established. This set out the need for a new model for Primary SEMH provision which addressed 4 key weaknesses in the current provision¹. The Integrated SEMH Provision (ISP) should provide

- Quality specialist provision for primary age girls with SEMH needs
- Access to the full primary curriculum for children
- Greater flexibility in pathways for children with SEMH needs, ensuring access to mainstream provision whenever appropriate

¹ Identified through the SEND Strategy(2020) and The SEMH (2019) Review Report both are available on the Tower Hamlets Website



- A model based on SEMH needs rather than driven by behaviour management and reducing exclusion.

The work is being planned and supported through the LA's SEN Teams who play a key role in enabling schools to meet the challenge of ensuring that all children and young people in Tower Hamlets achieve the best possible outcomes and can flourish if schools are working in effective partnerships. Ultimately, the guiding principle for this work is that whatever is done should be in children's interests, looking at a range of achievable options that will enable proper opportunity to decide how best to deliver a high quality and sustainable provision. Access to good quality school places is essential to raising achievement and addressing poverty and inequality in the long term.

Section 3 – Evidence (Consideration of Data and Information)

What evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

Level of Need (Data from SEND Strategy 2020)

Children in Tower Hamlets

Tower Hamlets has a young population. There are 112,900 0-25 year olds in Tower Hamlets. There are also high levels of deprivation in the borough, with 32% of children growing up in poverty. Around 8% of the population was born outside the UK and 75% of primary school children speak a first language which is not English (compared to 54% in Inner London and 21% nationally).

Children with special educational need and disabilities

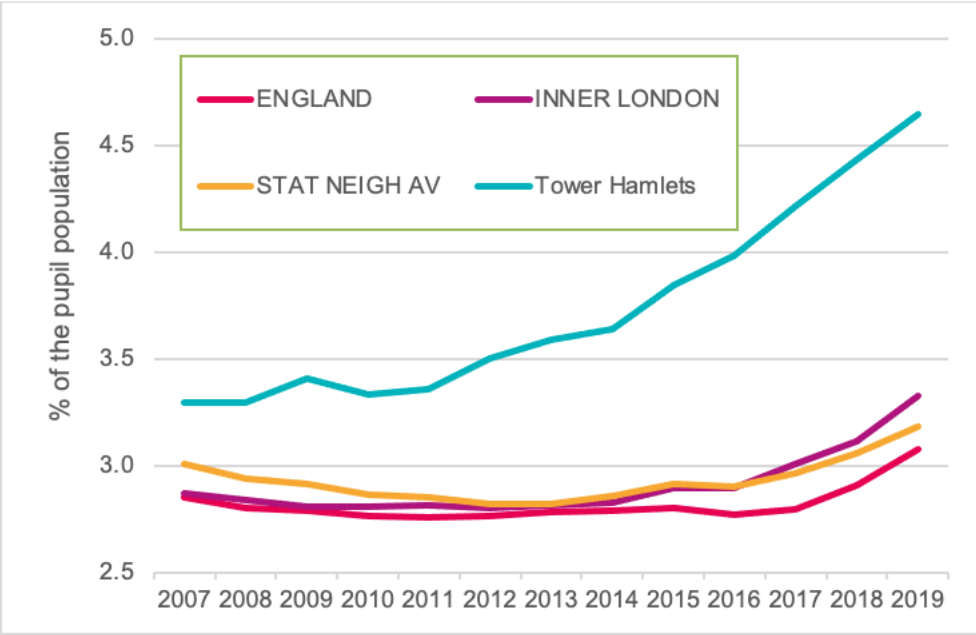
There are approximately 9,000 children and young people between 0 and 25 years with SEND resident in Tower Hamlets. The majority of these are supported by schools using their own budgets.

Approximately 3,300 children are given additional support (and resource) via an Education, Health and Care Plan (EHC plan).

There are more children with a special need in Tower Hamlets than in other areas, 17% of pupils in our schools have a special need or disability, compared to a national average of 15%.

Within schools the percentage of children and young people receiving SEN Support is 11.8%. This is lower than the average for England (12.1%) and London (12.6%). For children and young people with EHC plans the figure is 5.1%. This is significantly higher than both London (3.6%) and England (3.3%). This figure is increasing more quickly in Tower Hamlets than elsewhere.

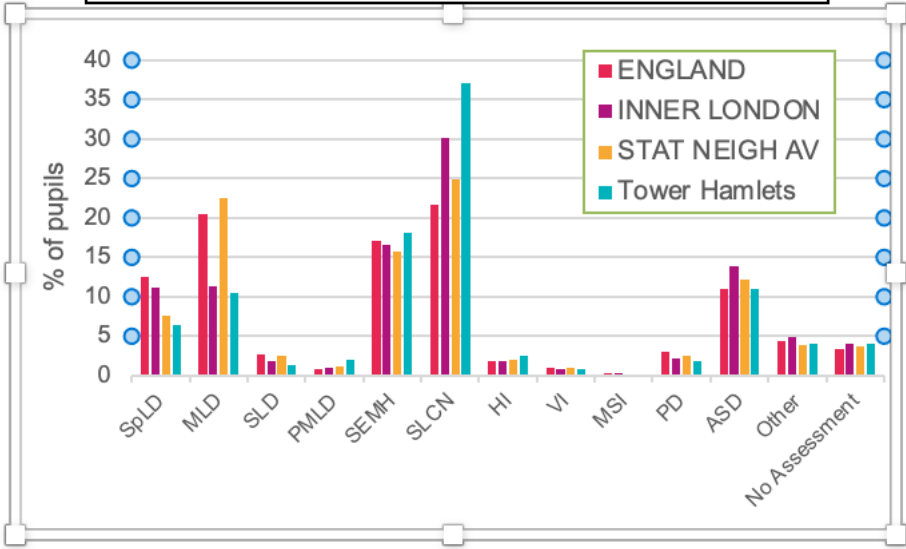
Figure 1 - EHC Plans as percentage of the pupil population over time, 2007-2019



Children with SEMH as their primary need

The proportion of children with SEMH as their primary need is slightly higher in Tower Hamlets (18%) than elsewhere. The proportion with Speech, language and communication needs (SLCN) is significantly higher than elsewhere at 37%. Many children with SLCN needs have secondary SEMH Needs.

Figure 2 – Breakdown of primary need type





Ensuring Access to the full Curriculum for all children

Most children with SEMH Needs should access a full curriculum in a mainstream school, with support.

The Tower Hamlets Behaviour and Attendance Support Service (BASS) offers schools advice on supporting children with SEMH needs in mainstream provision.

There is currently no identified Primary School which specialises in integrated mainstream support for children with SEMH needs (unlike SLCN, HI, ASD).

Tower Hamlets currently has a specialist SEMH Primary School, Cherry Trees School, which has 24 places for boys.

Cherry Trees has had 6 full inspections since it opened. Two of these judged the school to be outstanding, which is a credit to staff, governors, the boys and their families.

On a number of occasions OFSTED have commented that the capacity to provide a full ambitious curriculum for the boys has been limited. This will always be a risk in a very small school.

The OFSTED Report for Cherry Trees School in 2019 judged the provision at Cherry Trees to be inadequate and highlighted a number of curriculum weaknesses. This reflected the importance, identified in the new SEN Strategy of maintain high expectations for all children in Tower Hamlets, including those attending specialist provision.

Proposals to close Cherry Trees School are considered in a separate report to Cabinet.

Implications for children

Only a small number of children currently attend Cherry Trees School. The new ISP could accommodate any children currently at Cherry Trees, whose parents want a place for 2021-22. The new provision will be available for girls as well as boys, something which has not been available previously in the Borough.

The new ISP will ensure expertise is established in Borough including inclusion in mainstream and specialist expertise. This should benefit all children with SEMH needs as teachers will be able to see integrated provision for children and access this for support, as well the advice and support from BASS.

Children with SEMH needs will continue to have their needs met in mainstream schools, but for those with greater needs the ISP will be able to provide a flexible response with smooth transitions between mainstream integration and specialist support, based on individual needs. Places at the new ISP will be led by EHCP planning and agreed through the Local Authority SEN placement processes.

For Cherry Trees children and their parents and staff, the development of this provision should reduce some of the anxieties recorded in the Cherry Trees consultations. A full programme to support children and parents through this difficult period will be put in place, with the aim of helping them to recognise that moving school presents new opportunities as well as acknowledging how they have enjoyed their education at Cherry Trees.



Consultation

A range of consultations fed into the pre-publication consultations for the proposed new ISP provision.

Revised SEN Strategy Consultation (2017)

SEMH Implementation Plan Consultation (Summer 2020)

Cherry Trees Stage One Consultations (September 2020) and Statutory Notice (Dec 2020)

Bowden House and Ben Jonson Stage One Consultation (Nov 20- Jan 2021) and Statutory Notice (Jan- Feb 2021)

The Bowden House and Ben Jonson Governing Bodies were prompted by the Tower Hamlets SEN Strategy and SEMH Implementation to express an interest in delivering the new proposed provision. In September they were selected for this opportunity and began work on developing their proposals further, supported by an independent consultant, Dr Helen Jenner, as well as the Local Authority SEN Team.

A Steering Group consisting of representatives from both schools, supported by the Independent Consultant, has led the work on developing the new ISP.

Governors and the Headteachers have met, in various groupings, regularly since the Local Authority selected the schools for this project. This includes developing strong links with Cherry Trees School. A Service Level Agreement has been developed and agreed between the Schools and the Local Authority (Appendix 5)

Information about the new provision was included in the SEMH Implementation Plan. This was circulated to Headteachers and Governors by the Local Authority in the Summer Term. Information about the proposal was given in paper copy to all parents and staff and staff meetings have been held at both schools. The Statutory Notices have been posted at all 3 entrances to the Ben Jonson site, published in the local paper and the Headteacher's Bulletin and circulated to Chairs of Governors, Trades Unions, Diocesan Boards; the Council of Mosques and the Secretary of State has been notified of potential changes.

Information about the first stage consultation, and the Statutory Notice period was also placed on the schools' websites:

<https://bowdenhouse.school/news/post/bowden-house-school-statutory-notice>

<https://www.benjonson.towerhamlets.sch.uk/parents/consultation>

Due to the limitations imposed on public gatherings by COVID-19, it was not possible to hold face to face meetings for larger groups at the school or elsewhere. In order to ensure that pupils, parents, staff and the wider community were able to engage with and respond to consultation a range of opportunities were organised as follows:

The Notices include information on how to make representations, including schools and Local Authority email and postal addresses

A special email address was set up for comments at each school.

Virtual meetings were set up on 1st February – 2 for parents (9.30 and 2.30), 1 for staff (4.30) and 1 open meeting (parents, staff or stakeholders) at 6 pm

In addition, the independent consultant was available for 1 to1 socially distanced questions/feedback on Friday 5th January



Cherry Trees parents were contacted by the Acting Headteacher at Cherry Trees and the new provision discussed as part of EHCP reviews.

Staff Meetings have discussed the Strategy, processes and plans at all 3 schools. (Bowden House, Ben Jonson and Cherry Trees.)

Governors agreed responses from the different forms of consultation should be summarised in a report for Governors, to be sent to the Steering Group, following the end of the Statutory Notice Period. The Steering Group and Governing Bodies have reviewed feedback and used it to make a response to the council, on whether or not to recommend proceeding with the prescribed alterations. A report summarizing the feedback on the consultation will be available for staff and parents during the first half of the Summer Term 2021.

Other Evidence

Financial position of Cherry Trees

Ofsted reports

Equality Act 2010

SEND Strategy

SEMH Implementation Plan

Minutes of meetings where the future provision has been discussed

Consultation Document

Consultation Feedback Report

School Policies (Equalities, SEND and Inclusion)

Name of officer completing the EIA: John O'Shea

Service area: C&C SPP

EIA signed off by:

Date signed off:



Section 4 – Assessing the impacts on residents and service delivery

	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Age (All age groups)	X			<p>The prescribed alteration will improve specialist SEMH provision and specialist support for primary children in Tower Hamlets</p> <p>There will also be opportunities to employ new staff for the provision, including the potential to redeploy some staff in schools where there is a risk of redundancy, subject to the ISP Steering Group decision. This is likely to be through automatic inclusion in competitive interview for staff interested in employment who meet the selection criteria for new posts.</p> <p>Further work needs to be done in order to assess what job roles will be available, and the age range of applicants and successful candidates.</p>
Disability (Physical, learning difficulties, mental health and medical conditions)	X			<p>Pupils</p> <p>Currently the specialist support for Primary pupils with SEMH needs is considered inadequate, with weaknesses in access to the whole primary curriculum. By bringing together an excellent, inclusive Primary School with Excellent SEMH specialist provision a unique opportunity to establish world class inclusive provision for these very vulnerable children can be established.</p> <p>Over the academic year 2020/21, parents and teachers at Cherry Trees and the potential new provision have the opportunity to ensure a seamless transition for children with SEND, building on the support that has been provided at Cherry Trees. Annual Reviews for children at Cherry Trees have been brought forward in order to give adequate time to ensure the new provision is fully equipped to meet their needs, if they are transferring to it in September 2021.</p> <p>Staff</p>

				Recruitment processes will be mindful of the needs of applicants with SEND and take into account the Equality Act 2010 in order to ensure they are not discriminating against those with disabilities.
Sex	X		X	<p>Pupils</p> <p>There is currently no specialist provision for primary age girls with SEMH Needs in Tower Hamlets. By making the prescribed alteration to include primary age girls as part of the Bowden House provision the availability of support for girls is significantly enhanced.</p> <p>Staff</p> <p>No impact – the prescribed alterations will not impact on existing staff positions. Recruitment processes will ensure gender equality.</p>
Gender reassignment			X	No impact - We do not have any data available on this protected characteristic for pupils or staff.
Marriage and civil partnership			X	No impact - We do not have any data available on this protected characteristic for pupils or staff.
Religion or philosophical belief			X	No impact - we do not have any data available on this protected characteristic for pupils or staff. However, as neither of the schools is a faith school, we do not expect there to be a disproportionate impact.
Race			X	<p>Pupils</p> <p>The largest ethnic group of children at Ben Jonson is Bangladeshi; at Bowden House and Cherry Trees it is White British. Careful planning will be needed to ensure that parental friendship group fears from parents and children do not negatively impact on social skills, networks and opportunities. This should be carefully monitored in the new provision.</p>

			X	<p>The Local Authority does advise that multi-cultural schools are likely to be beneficial to fostering good relations between individuals in different ethnic and/or racial groups, as children will have the opportunity to make friends with children from different races to themselves at a formative stage of their personal development. However, there is also an awareness that some parents appreciate the option to choose a school where their child has representation on an ethnic level, and that some children and their families find becoming “minority white” an additional stress.</p> <p>Staff No impact – staff recruitment processes should ensure attention is paid to recruiting to reflect the local community.</p>
Sexual orientation			X	No impact - we do not have any data available on this protected characteristic for pupils or staff.
Pregnancy and maternity			X	No impact - we do not have any data available on this protected characteristic for pupils or staff.

Other

Socio-economic			X	<p>The percentage of children receiving FSM does vary across the neighbouring schools and tends to be higher for children with disabilities. In Tower Hamlets disadvantage is not seen as a barrier to achievement, and gaps in attainment are low. The ISP provision is expected to further enhance outcomes for disadvantaged children.</p> <p>Indeed, the speed and agility with which schools in LBTH moved to support</p>
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				<p>parents with food vouchers and food parcels during the closure of schools owing to COVID 19 suggests that any children with FSM eligibility will be well supported at school in LBTH.</p> <p>There are high numbers of FSM for children with EHCPs</p> <p>The ISP provision expects to fund school uniform changes if necessary. Going forward, the schools may want to consider supporting families in the case that a child moves from the roll of Ben Jonson to the roll of Bowden House and vice versa, and this requires a change of school uniform.</p>
Parents/Carers			X	<p>During the consultation period, parents at Cherry Trees raised several questions. They mainly felt that their children were happy at Cherry Trees and would prefer that they complete primary education at the school. One parent was particularly worried around future friendship groups for her son.</p> <p>Parents at Bowden House, Seaford are pleased that there will be no alterations to the secondary provision. Some parents are pleased to know there will be a Bowden House provision at primary level and centrally located in Tower Hamlets.</p> <p>Ben Jonson parents are pleased that there will be access to a wider range of support for Ben Jonson parents. There was previously an Autistic Spectrum Disorder (ASD) satellite class at Ben Jonson so they have experienced a similar model and this has reduced anxiety.</p> <p>Parents and carers should continue to be heavily involved in the consultation process and beyond, as the new provision develops.</p>
People with different Gender Identities e.g. Gender fluid, Non-Binary etc			X	<p>No impact - we do not have any data available on gender identity for pupils or staff.</p>



Section 5 – Impact Analysis and Action Plan

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Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
Further analysis of workforce recruitment data needs to occur	Request recruitment data from ISP	By end of recruitment process, as part of SLA	JO'S	Completed
Bring Annual Reviews for pupils at Cherry Trees School forward	Assess whether any additional resources or support would be needed if the child was to transition to new provision	By end of statutory consultation period,	JO'S	
Provide support for parents/carers	Ensure work with parents and carers embedded in new provision	Include in SLA and Ongoing throughout academic year	JO'S	
Ensure children supported to access friendship groups	Ensure this element included in Annual Review	Ongoing throughout academic year	JO'S	



Section 6 – Monitoring

Have monitoring processes been put in place to check the delivery of the above action plan and impact on equality groups?

Yes?





No?

Describe how this will be undertaken:

The SEN Team will monitor and review the action plan as part of SLA Reviews

Appendix A

Equality Impact Assessment Decision Rating

Decision	Action	Risk
As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act. It is recommended that this proposal be suspended until further work is undertaken.	Suspend – Further Work Required	Red 
As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.	Further (specialist) advice should be taken	Red Amber 
As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the Action Planning section of this document.	Proceed pending agreement of mitigating action	Amber 
As a result of performing the EIA, the proposal does not appear to have any disproportionate impact on people who share a protected characteristic and no further actions are recommended at this stage.	Proceed with implementation	Green: 

London Borough of Tower Hamlets

and

**Ben Jonson and Bowden House Schools
Integrated SEMH Resource Provision (SRP)**

**SERVICE LEVEL AGREEMENT FOR SCHOOLS RESOURCE
PROVISION**

Feb 11th Draft 2021

BACKGROUND

This Service Level Agreement (SLA) has been drawn up between London Borough of Tower Hamlets and Schools in order to formalise the arrangements between the two parties in respect of a Special Resource Provision (SRP) to be set up and funded by London Borough of Tower Hamlets at Ben Jonson and Bowden House Ben Jonson and Bowden House. This Special Resource Provision (SRP), is specifically for the purpose of making provision for primary pupils with Social, emotional and mental health (SEMH) needs. The Provision will be known as:

Bowden House and Ben Jonson Integrated SEMH Primary Provision (SRP)

1. SCOPE OF AGREEMENT

This SLA relates solely and exclusively to the operation and function of the Special Resource Provision.

2. PURPOSE

- 2.1 The purpose of the SRP is to make additional, resourced provision for up to 24 primary age pupils with SEMH Needs. It forms part of the London Borough of Tower Hamlets Councils Strategy to make a continuum of provision available for all pupils with additional needs in mainstream Ben Jonson School and Bowden House Special schools.
- 2.2 The SRP will make provision for pupils who have SEMH needs. These pupils will have their needs identified and set out in an Education Health and Care Plan. In exceptional cases children may be placed in the Resource Base whilst undergoing a SEND statutory assessment of needs.

3. SERVICE DELIVERY

- 3.1 The SEMH Provision will be set up as:

- a) An integrated provision,

comprising an SRP wholly managed by Ben Jonson School (and integrated within the mainstream classes in school) and a primary extension of Bowden House School wholly managed by Bowden House.

The provision will be integrated through the establishment of a Joint Steering Group, with representatives from Ben Jonson and Bowden House governors providing governance for the provision. The Steering Group will report back to the two governing bodies at least termly.

b) A provision with the potential to develop an Outreach service specially provided to meet the specific needs of pupils/students with additional needs and educated at other London Borough of Tower Hamlets Provision.

- 3.2 In addition to this document the schools and LA will establish a set of agreed KPIs and agreed operational guidelines. The Integrated Provision will be expected to produce a clear, specific document that describes the provision (operational guidelines) and expected outcomes against which it will be monitored and evaluated using the agreed KPIs. The document will be made available to parents, governors and the LA in advance of Sep 1st 2021.
- 3.3 The Headteachers from both schools, and the Joint Steering Group, will be responsible in all respects for the effective running of the Integrated Provision. They will publish an annual report, following self-evaluation and any other agreed monitoring and evaluation arrangements, to the Local Authority. They will also report to parents/carers.
- 3.4 The schools will ensure pupils' needs are met through their inclusive practice, making full use of the additional resources delegated to them for this purpose.

4. REGISTRATION

- 4.1 It is expected that the SRP will be registered with the Department for Education (DfE) in due course, following a prescribed alteration statutory consultation process, as providing a resource and included in the Schools' published information.

5. DESCRIPTION AND AGREED OPERATIONAL PROCEDURES

- 5.1 The Integrated Provision will be a specialist resource, established at a mainstream site, designed to meet the needs of up to 12 pupils whose needs can be met in a specialist provision as part of Ben Jonson School and up to 12 children whose needs will be met through the primary provision which will be an extension of Bowden House School. It will provide a provision for pupils whose needs can only be served through a flexible approach, tailored and adapted to the needs of each individual pupil. It will be for pupils who may require spending significant proportions of their time accessing specialist support from the resources provided to the Integrated Provision. In order for the appropriate support to be flexibly accessed through the provision all children attending the Integrated Provision will have Bowden House Primary or Ben Jonson specifically named in their EHC Plans.

Operational Guidelines will be confirmed and agreed in the Summer Term 2021.

The operational guidelines should include:

Structure and organisation

Staffing Structure

Safeguarding Policies

Governance

Curriculum and Pedagogy (including individual assessment and progress)

School Development Planning

Pastoral Care

Health and Safety

Financial Management

Parental/carer engagement and support

Links with other schools

Annual SLA Review Process

Annual EQIA Review

6. NUMBERS

- 6.1 The Agreed Place Number (APN) for the Integrated Provision is 24. 12 of the APN admissions number will be included in the Ben Jonson PAN – 90 children per year. The remaining 12 places will be part of the Bowden House admissions number. Admissions to the Integrated Provision is through the Tower Hamlets SEN Panel.
- 6.2. To deliver full inclusion in Mainstream classes in the Ben Jonson element of the provision it is recognised that numbers may need to be capped at 2 per year group.

7. FUNDING

- 7.1 The provision will be funded in accordance within a Place Led Funding approach that complies with the Government's SEN Funding Reforms which came into effect in April 2013. The detail for this is included in the Funding document attached. Place funding is set at £10,000 per pupil (which includes AWPU).
- 7.2 It is the SRP responsibility to ensure that all children attending the SRP are included on the schools census returns and input as attending the SRP, to ensure that the schools receives at least the minimum per pupil funding in

accordance with the National Funding Formula and London Borough of Tower Hamlets place led funding approach.

- 7.3 Needs based funding will be paid over and above the place funding, agreed on an annual basis. This is expected to be at Band D for Ben Jonson pupils, and at the agreed element 3 top up rate for Bowden House provision.
- 7.4 Each year a moderation exercise is conducted by LA staff in conjunction with all the schools who host an SRP. The moderation process will check which resource base pupils are currently in and projected to join the provision and confirm any changes for the next year. Following this a separate process will confirm the number and level of planned places for the following financial year.
- 7.5 This process will normally be conducted in November so that the outcome informs the budget setting process prior to the next financial year. An annual funding statement for the resource base will be produced by the LA for the schools which summarises the number of planned places, the level of pupil needs and level of funding.
- 7.6 If, in exceptional circumstances, a pupil is placed in the SRP above the agreed number for the year an additional payment will be considered to the schools if additional resource is shown to be required.
- 7.7 The funding provided will enable each provider to operate an agreed staffing model. This is to ensure that each SRP is able to operate a workable and balanced approach to its staffing, allowing sufficient funds for this purpose.
- 7.8 The funding is additional to other SEN funding allocated to the schools delegated within London Borough of Tower Hamlets arrangements for pupils with predictable and exceptional/high needs. This is specifically for the purpose of supporting pupils placed at the SRP as this is their primary source of funding. The SRP is allocated funding within a place led approach, so that it can exercise reasonable flexibility to meet the needs of these pupils.
- 7.9 SRPs will be fully funded for agreed staffing ratios and support, it would not be expected that the mainstream Schools would subsidise in any way the cost of the provision or that the provision would subsidise the running of the mainstream schools. With this consideration a “top slice” or central contribution of up to a maximum of 10% can be made by the schools to cover all central service costs including staffing and leadership. An exceptional allocation has been made to Bowden House Seaford, of £50,000 in recognition of the increased management costs of creating and supporting a new provision when the school is based in Seaford.
- 7.10 Should the resource base be operating with fewer pupils than it is funded for, a plan will be drawn up between the LA and the schools about how to best use this capacity funded from Dedicated Schools Grant for the benefit of pupils with learning needs who attend other London Borough of Tower Hamlets schools. Whenever such an arrangement is put in place it will be

formalised in a separate written agreement and promptly reviewed if circumstances change during the year.

8. REFERRAL PROCEDURES

- 8.1 All referrals will be through the LA as the admissions authority. These will include relevant reports, based on recent assessments, from:
- 8.2 The most recent schools / PRU attended, any additional available reports from Educational Psychologists, Paediatricians, Speech and Language Therapists, Occupational Therapists, Medical or other professionals.
- 8.3 Children will meet the following criterion for entry to the SRP:
- 8.31 Children will have SEMH needs that significantly impact on their access to mainstream education and require a high level of support in order to progress their learning and social, emotional and mental health development.

9. ADMISSIONS PROCESSES

- 9.1 Admissions to the SRP will be made through the SEND processes where individual placement requests for pupils with EHC Plans are made through annual/interim review meetings and these are then considered at the Local Authority SEND Case Management Meeting. If a child has SEMH needs is discussed at panel then both schools need to be consulted as the SRP admissions meeting will consider the placement of the child and the most relevant setting, if any.
- 9.2 Following approval at the SEND Case Management meeting (or in exceptional cases consideration by senior LA staff outside this meeting), placement requests are then considered at an SRP admissions meeting attended by both schools and the Local Authority.
- 9.3 In addition to this process the Local Authority, in exceptional circumstances, may approach the SRP for an admission to the resource for a child undergoing a SEND statutory assessment.
- 9.4 Admissions to the SRP will follow the formal placement consultation processes set out in the SEND Code of Practice 2014.
- 9.5 The numbers of pupils in each year group along with the current levels of SEND (both EHCP and SEND support) will be taken into account in admission decisions.

10. ARRANGEMENTS FOR THE REVIEW OF PUPILS

- 10.1 The Schools, in conjunction with the LA shall be responsible for organising regular reviews of the pupil's progress including annual reviews as set out in the SEND Code of Practice 2014.

- 10.2 Transition reviews will take place to ensure appropriate planning for transition across key stages and schools' placements. These should always consider any EQIA issues that may arise from school transfers.
- 10.3 The balance of provision for all 24 pupils will be reviewed annually by the Joint Steering Group. This will also include a review of any equalities issues.
- 10.4 The effectiveness and appropriateness of the provision will be reviewed annually with the LA. An in-depth review will take place in Year 2 to ensure the viability and long-term future of the provision.

11. SAFEGUARDING

- 11.1 All SRP staff have up to date training in safeguarding. They will also be aware of, and adhere to, the safeguarding policy of the school and LA. This includes robust risk assessments of pupils who access the SRP and the schools' premises or activities. Any untoward activity or incident will be immediately reported and acted upon.
- 11.2 Parent/carer liaison will be led by SRP staff who should also meet with parents/carers at least termly. Liaison processes should be reviewed as part of the Annual Review process. Where appropriate and/or necessary, other professionals may also be involved.

12 SRP STEERING COMMITTEE

- 12.1 The SRP will have a Steering Group comprising the Head teachers/ Senior Managers, LA SEN and Finance officers. It will be chaired, initially by the Independent Consultant, Dr Helen Jenner. This group will meet monthly to discuss any strategic and operational matters or issues in respect of the SRP. From September 2021, this group will become the SRP Strategic group (with the same membership) and it will meet at least termly. It will also help prepare the annual report for the Local Governing Body and the LA.
- 12.2 The SRP Strategic group should be given all financial records to allow the monitoring of costs and ongoing funding and any commissioning requirements.
- 12.3 From September 2021 onwards the SRP Operational group will be set up comprising of the leads from the Ben Jonson Provision and the Bowden Provision leads and key provision staff members. This group will oversee the day to day management of joint work and staff between the two provisions.

13. ROLES AND RESPONSIBILITIES

- 13.1 The LA will provide the funding and support required to ensure that the SRP is appropriately resourced and runs smoothly. It will also assist with the operational functions, specifically through its representation on the Strategic Group. In addition, it will make and/or facilitate arrangements for the monitoring and review of the SRP.

- 13.2 In return, the SRP and, where relevant, the Operational group will ensure that the needs of its pupils are met, that staff are supported and that parents/carers and other agencies are appropriately involved.
- 13.3 Whilst the LA will be responsible as the Admissions Authority for all admissions and funding matters, the Head teacher/Leaders with responsibility for the SRP, will undertake the day to day management of the SRP, including all the associated functions, in respect of governance and quality assurance.

14. SERVICE SPECIFICATION

- 14.1 The Schools or Other Body will provide the appropriate levels of staffing and support to pupils, taking account of the Staffing Funding Model. This will enable them to meet the identified needs of pupils placed at the SRP, as detailed in their EHCPs or in other professional reports as agreed by the London Borough of Tower Hamlets Council.
- 14.2 There will be a senior leader in charge of each provision, appointed by both Headteachers, directly reporting to the Schools/Service Head and where required, the Strategic Group and Local Governing Body. These will be known as Head of Provision
- 14.3 The Heads of Provision will either have relevant specialist training, qualifications and experience/expertise or will be supported through specific training to enable them to meet the needs of pupils with such needs. They will be a senior member of staff working full time on SRP duties, liaising with key staff such as the SENCO, the schools' senior management and relevant professionals. The Heads of Provision for Ben Jonson and Bowden House will be responsible for ensuring high quality provision and strong outcomes for the children (as evidenced by the KPIs).
- 14.4 The SRP will also have Learning Support Staff who will also be trained and experienced in the SRP specialism and will continue to attend learning and development opportunities as required. In particular, they will receive training to enable them to provide in-house therapy for children enrolled at the integrated provision.
- 14.5 The Schools will provide suitable rooms, sufficiently spacious, to provide for the needs of the agreed place number of pupils, with LA financial support for capital works. The SRP will also be making suitable use of the schools' wider facilities and resources.
- 14.6 The schools will provide an operational procedures document, based on the LA guidelines, detailing how the allocated funding will be used. This will detail its aims and objectives, its staffing, its facilities and resources, its admissions and exit criteria and its methods of working with parents and other partners.

14.7 The schools will also complete a research project in Summer 2021, which will lead to a report and agreed KPIs which should be reported on the website, and included in an Annual Report to the Steering Group, the Schools' Governing Bodies and the Local Authority.

15. MONITORING AND REVIEW OF PROVISION AND LEARNING OUTCOMES

15.1 The SRP will be monitored internally by the Head teacher/Leader, with management responsibility for the SRP, and his/her senior management, resulting in its self-evaluation which can then be discussed at the Strategic Group and the Governing Body. The SRP will be expected to provide an annual summary of progress against agreed KPIs to the LA which will then be reported to all Schools through the Schools Forum.

15.2 The LA shall arrange termly meetings with the SRP Strategic group to consider future admissions / leavers, report on the general progress of pupils, monitor the budget and discuss any points of concern. These meetings shall include the Schools head teacher, or their representative, the Principal Educational Psychologist, or representative, The SEND Manager or any other professional if appropriate.

Schedule of meetings

Autumn Term	Baseline and outturn Data of Previous Year.
Spring Term	Finance
Summer Term	Service Review

16. SERVICE REVIEW/MILESTONES

16.1 The SRP will provide a Service Level Statement, Operational Protocols and Prospectus for Parents and other agencies. These will be public documents which detail the range of its work, its referral criteria, performance indicators and the provision it makes for pupils.

16.2 A Self Evaluation review will be conducted each year, leading to a Service Development Plan that will then be subject to external reviews annually. The SRP will produce for inspection by OFSTED or for discussion with its Schools Improvement Partner (SIP), any material that may be required from time to time for the purpose of quality assurance.

17. DURATION OF THIS AGREEMENT

17.1 This agreement is binding on the LA and Ben Jonson and Bowden House Schools for a period of 3 years, with effect from the date on which it is signed by the parties shown below. It may be renewed for further periods of 3 years subsequently, depending on continuing agreement of all parties. Either party may also ask for a review at any time, giving at least one term's notice, but not until this agreement has been in force for a period of at least two years. Any proposal to cease this agreement will not take effect until both parties have had reasonable notice to make alternative arrangements, which for the terms of this agreement, will mean no less than 18 months.

AGREED BY:

Strategic Lead Specialist Provision

SENIOR OFFICER: LONDON BOROUGH OF TOWER HAMLETS COUNCIL

Date:

HEADTEACHERS: Ben Jonson and Bowden House Schools

Date:

Ben Jonson and Bowden House SCHOOLS:

Date:

Appendix 1 KEY PERFORMANCE INDICATORS

This generic list should inform the Specific List which follows (on Page 3) and which will need to be refined for the provision, following the research work in the Summer Term 2021 (p13)

Generic SRP KPIs

Information required/criteria	KPI
The number of pupils in The Resource Provision at the end of each term and their year groups	
The number of new entrants to The Resource at the commencement of each term, and the total number of entrants at the date that the information is provided	
The number of pupils who have a minimum of three Individual Education Plan targets in place agreed under the specific, measurable, attainable, relevant, time framed (SMART) principles which are reviewed at the SAR annual review	100% of pupils will have above targets in place within 2 months of being placed in the resource base.
The progress of individual children within the SRP in relation to the outcomes in their Education Health and Care Plans.	
The number of pupils who have clear plans in place for transition to Mainstream Schools with clearly identified the SMART actions agreed.	100% of pupils will have clear plans in place within 3 months of their transition to the resource base.
The Improvement in pupils' learning and social communication evidenced through baseline assessments completed by the service at the start and finish of interventions	75% to have made evidenced progress in their identified targets for learning and social communication.
The improvement in children's ability to access the curriculum, evidenced through baseline assessments completed by the service at the start and finish of interventions.	
SRP Specific Indicator	
70% of feedback from parents/carers and children and staff in school is good or better.	
The Schools shall provide a report (the SRP Performance Report) to the	

Council forthwith at the end of each academic year detailing the activities, problems, successes and outcomes achieved by The Resource during the year.	
The progress of children in relation to English and Maths. The schools shall provide an annual report on measured pupil outcomes in relation to the individual pupil goals set for all pupils.	At least 80% of pupils are able to demonstrate progress in English and Maths in line with expectations for the individual child.
The Schools shall undertake a survey("Pupil / Parent / Carer Satisfaction Survey ") of pupils , parents / carers at the commencement of the pupils attendance at The Resource, at the end of the academic year and when the pupil leaves The Resource to set the base line and direction of travel for each of the pupils	the Schools will have undertaken a survey of 80 % of the pupils
The Schools shall advise at the end of each academic year the following outcomes	
The number and percentage of parents / carers who are of the opinion that their child has made appropriate progress in learning since attending The Resource	the Schools will have achieved 80% satisfaction regarding progress from the surveys
The number and percentage of children whose attendance at The Resource is at 90% attendance. For any pupils whose attendance is under 90% a detailed SMART attendance plan will be in place setting out the actions being taken to address this and the outcomes of this plan.	the Schools will have a SMART attendance plan for 100% of pupils at the Resource within one month of their attendance falling below 90%
ANY OTHER SPECIFIC KPIs AGREED BETWEEN THE LA AND THE STEERING GROUP	

Draft Specific KPIs and expectations

Bowden House and Ben Jonson Integrated Provision

Key Performance Indicators (Drafted in January – to be refined following Summer Term Research)

	Summer 21	21-22	22-23	23-24
Children attending	0	At least 8 (2*4)	At least 16 (2*8)	Up to 24 (2*12)
Linked children	12 (2*6)	8(2*4)	8 (2*4)	To be confirmed in Year 2
Establishing provision - Staffing	Redeployment from Cherry Trees considered Staff for September recruited Therapies training for TA staff	Staff for 8 (2*4) in place, with capacity to increase if needed Therapies training for TA staff	Staff for 16(2*8) in place with capacity to increase if needed Trained therapists in place	Staff for up to 24 (2*12) Consideration of Outreach potential
Establishing provision - Expectations	Review of current provision and expectations across at least 12 schools supporting children with SEMH EHCPs to establish ambitious targets (SMART). KPIs agreed for: <ul style="list-style-type: none"> • Attendance • Attainment • Academic Progress • SEMH Progress • Access to Mainstream • Transition 	Systems for monitoring agreed KPIs in place for Sept. Clear KPI evidence by July 22.	KPIs show impact for individuals and Cohort	KPIs showing demonstrable impact on LA provision

	<p>Support</p> <ul style="list-style-type: none"> Progress against EHCP Needs and Individual Targets 			
Finances	Budgets established with clear accountability	Balanced budget expected	Balanced budget expected. Financial planning full review with LA	Balanced budget expected
Buildings (Target for LA)	Essential changes made – toilets, doors, fence. Longer term ambition agreed	Longer term changes planned	Longer Term changes implemented by Sep 22	
Management Time (both)	Include awareness of this in research report	Log of time required for meetings, Child Protection, social work etc., and line management activity	Log of time required for meetings, Child Protection, social work etc., and line management activity	
Management Time (Bowden House)	Log of time and costs associated with Bowden House set up	Log of time and costs associated with Bowden House support.	Expectation of reduced management time as provision established	
EQIA considerations	<p>Develop KPIs, as expected for all schools,</p> <p>From consultation- For staff: Ethnicity, gender</p> <p>For children: Friendships Gender balance</p>	<p>Through census reporting</p> <p>Annual EQ review</p>	<p>Through census reporting</p> <p>Annual EQ review</p>	

	For parents: Engagement and involvement			
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Summer 2021 Research Project Specification (To be refined in discussion)

During the Summer Term 2021 Bowden House and Ben Jonson Schools will be establishing the provision which will be open from September 2021.


As part of the preparations the Local Authority would like the two schools to jointly undertake a research project reviewing current mainstream primary provision, and visiting specialist provision elsewhere. The LA would recommend that each visit be undertaken by at least 2 staff, one from each aspect of the provision. The LA would ask that at least 12 such visits are undertaken (this can include schools that children may be transferring from).

The research should seek to address and review some of the issues raised in the external review of provision and should include views of children, staff, parents, current outreach provision, as well as empirical data. It should also include relevant literature on supporting social, emotional and mental health needs for primary children. It should clearly address recommendations from the 2019 SEMH Review, and any issues raised during consultation processes.

As well as giving an insight into current provision it should also provide the basis for determining detailed Key Performance Indicators, ensuring that the new provision is ambitious and effective.

KPI – delivery of a research report (based on 12+ children/settings) which reviews current provision, establishes baseline and advises on KPIs for new provision by July 31st 2021 (or sooner).

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<p>Cabinet</p> <p>3 March 2021</p>	
<p>Report of: Denise Radley, Corporate Director Health Adults & Community</p>	<p>Classification: Unrestricted</p>
<p>Community Safety Partnership Plan 2021-2024</p>	

Lead Member	Councillor Sirajul Islam, Deputy Mayor for Community Safety, Faith and Equalities
Originating Officer(s)	Ann Corbett – Divisional Director, Community Safety Jack Kerr – Strategy and Policy Manager Leo Hutchinson – Community Safety Commissioning Manager
Wards affected	All wards
Key Decision?	No
Forward Plan Notice Published	12 November 2020
Reason for Key Decision	Impact on Wards
Strategic Plan Priority / Outcome	2. A borough that our residents are proud of and love to live in

Executive Summary

Working to make Tower Hamlets a safer place for our residents and communities is a key priority in Tower Hamlets. Feeling or being unsafe can manifest in a number of ways, from anti-social behaviour (ASB) to serious violence to exploitation and can happen in both public and private spaces. We know that the impact can be devastating for both victims and perpetrators, and residents continually highlight crime and ASB as a priority issue they want to see improve.

Tower Hamlets has specific challenges and strengths when it comes to crime and ASB. We have high levels of deprivation, high levels of substance misuse and high population density; all of which have implications for community safety. Our strengths are in our diverse and active communities and in our strong record of effective partnership working.

Furthermore, the Covid-19 pandemic has had and will have a significant impact on crime, ASB and its root causes. We know, for example, that ASB demand has risen significantly since March 2020; and whilst levels of domestic abuse locally have not risen to the extent feared at the start of the pandemic, it remains a key area of concern given some victims will have gone into lockdown with their abusers. Going forward, we will need to understand the longer-term impacts of the pandemic and

what this means for community safety. As well as challenges, there may be opportunities to further utilise resident empowerment and community mobilisation to help prevent and tackle crime and ASB.

Overall then, our 2021 Community Safety Partnership Plan aims to tackle crime and disorder whilst simultaneously addressing their root causes. It has been developed with an awareness of our challenges and it aims to build on our strengths, setting out our priorities over the next three years and the action we will take to achieve them.

The four priorities in the plan can be summarised as follows:

- Tackling neighbourhood crime and ASB
- Tackling hate crime, community tensions and extremism
- Reducing reoffending and tackling the drivers of crime
- Violence reduction: safeguarding those at risk of violence and exploitation

Six key principles are embedded with the plan to define the partnership's approach to these priorities. These are:

- Early help and prevention
- Public health approach to violence
- Contextual safeguarding
- Resident involvement
- Collaboration
- Supporting victims

Finally, it is recognised that people's experience of crime, disorder, safety and services is not the same. Being a woman, being of a Black, Asian and minority ethnic background, being LGBTQIA, being disabled, having different gender to the one assigned at birth, being older or younger – for example - all has an impact. We are clear in the CSP plan that we will continue to tackle inequality in relation to this as part of our borough-wide commitment to tackle inequality in all its forms.

The new CSP plan is supported by a comprehensive strategic assessment that draws on data from across the partnership to identify trends, patterns, and drivers of crime and anti-social behaviour. It has also been informed by extensive consultation and engagement with various partners: with community groups and Tower Hamlets residents consulted as part of the engagement process.

Recommendations:

The Cabinet is recommended to:

1. Recommend that Full Council approve the Community Safety Partnership Plan 2021-23, as per the Council Constitution.

1 REASONS FOR THE DECISIONS

- 1.1 Community Safety Partnerships are required under the Crime and Disorder Act (1998) to ensure a strategic plan is in place to address crime and disorder

locally. The current plan ends on 31st March 2021 and a new plan is being developed for 2021-2024. As the Community Safety plan is a partnership document listed in the Constitution, it is reserved for final decision by full Council subject to prior approval by Cabinet.

2 ALTERNATIVE OPTIONS

- 2.1 The content of the plan can be amended in line with feedback. There is a statutory responsibility for Community Safety Partnerships to produce a Community Safety Partnership Plan, detailing how crime and disorder will be addressed locally. Under the Council Constitution, it is the role of Full Council to ratify that plan.

3 DETAILS OF THE REPORT

Context and background

- 3.1 Crime, disorder and ASB has a major impact on residents' sense of wellbeing and tackling the interlinked issues of violence, exploitation, ASB and drugs and alcohol is a significant challenge.
- 3.2 The context for Tower Hamlets includes that we are a borough that:
- Is comparatively young and diverse
 - Is densely populated and growing quickly
 - Has high but improving levels of deprivation
 - Has some of the toughest health inequalities in the UK caused by deprivation and related housing and employment needs
 - Has comparatively high levels of substance misuse issues.
- 3.3 This context has and will be shaped by the seismic changes brought in with the Covid-19 pandemic. We know, for example, that the wider economic impacts of the pandemic have been devastating for many, and this has and will have knock-on impacts for crime and safety.
- 3.4 The direct impact of Covid-19 on crime and ASB can be summarised as follows:
- Broadly speaking, the first lockdown in spring 2020 caused an overall reduction in crimes including burglary, robbery and violence with injury (non-domestic abuse) although these subsequently increased as lockdown restrictions lifted.
 - ASB reports increased significantly with lockdown and this trend remains: It is at least partially thought to be due to noise complaints, friction between neighbours and concerns about non-adherence to social distancing restrictions.
 - Levels of domestic abuse reports locally have not risen to the extent feared at the start of the pandemic however it remains a key area of concern given some victims will have gone into lockdown with their abusers.

- The nature of lockdown may have made abuse, neglect and exploitation more hidden; and some crime methods will have evolved and adapted – a key challenge for all partners going forward.
- 3.5 Finally, the last 12 months has brought a welcome focus on the inequalities and discrimination facing people of Black and Asian and minority ethnic backgrounds following the death of George Floyd and the Black Lives Matter movement. This focus continues into our Community Safety Partnership Plan with commitments to tackle in inequalities facing our communities in relation to this.

Developing the plan

- 3.6 The 2021-24 Community Safety Partnership Plan represents a significant commitment from the statutory partners of the Community Safety Partnership: including the Council, Police, Fire Service, National Probation Service and Health authorities. In addition, non-statutory partners and local voluntary groups are also committed to working together to improve the lives of Tower Hamlets residents. The plan presents the Community Safety Partnership's (CSP) priorities and approach to tackling crime and disorder in Tower Hamlets in light of the context, challenges and opportunities we face.
- 3.7 The plan is supported by a detailed strategic assessment that draws on data from across the partnership to identify trends, patterns, and drivers of crime and anti-social behaviour.
- 3.8 The plan is also informed by a wide-ranging consultation and engagement with partners that was carried out over July-December, and with community groups and Tower Hamlets residents. The consultation was carried out in accordance with social distancing guidelines and included the following activity:
- Individual interviews with Community Safety Partnership organisations
 - Four steering group meetings with Community Safety Partnership organisations
 - An engagement event with the Young Mayor and his Cabinet
 - Workshop with the Safer Neighbourhood Ward Panel Chairs
 - Engagement with Tower Hamlets Inter Faith Forum
 - An online resident survey that received 224 responses
 - Reference to consultation and engagement carried out to develop Tower Hamlets Violence, Vulnerabilities and Exploitation Strategy 2021-24
 - Reference to consultation and engagement carried out to develop Tower Hamlets Substance Misuse Strategy 2020-2025.
 - Reference to consultation and engagement carried out to develop Tower Hamlets Violence Against Women and Girls Strategy 2019-24

The priority areas and the outcomes that the Community Safety Partnership seeks to achieve, through the delivery of this plan, are a reflection both of the data and what our partners and residents told us through the engagement activity.

Community Safety Partnership Plan Priorities 2021-2024

- 3.9 The new Community Safety Partnership plan has the following four priorities. (Please refer to the presentation of the Plan attached as appendix A to this report for more detail on each of the priorities)
- Tackling Neighbourhood Crime and ASB:
This priority places a focus on ASB (including Nitrous Oxide use), the use of ASB tools and powers, Community Triggers to tackle repeat ASB, Public Space Protection Orders (PSPO), CCTV, targeting problem locations in partnership, designing out crime, fire related ASB and tackling high volume neighbourhood offences such as burglary.
 - Tackling Hate Crime, Community Tensions and Extremism:
This priority places a focus on Hate Crime, Community Cohesion and Extremism. They have been grouped together as one priority due to the links between the three. This priority also includes the important statutory work that the partnership carry out under the Prevent Strategy.
 - Reducing Reoffending and Tackling the Drivers of Crime:
This priority focuses on the cohort of offenders who re-offend and are responsible for a disproportionately large number of offences in the borough. In addition, this priority also puts a focus on targeting some of the key drivers of crime. This includes Serious Organised Crime, drug supply, substance misuse and rough sleeping. Drug dealing and substance misuse remains a concern for our residents. The Community Safety Partnership plan will align with the Substance Misuse Strategy 2020-2025 approach to tackling drugs and substance misuse. Similarly, there is also alignment with Tower Hamlets Homelessness and Rough Sleeping Strategy 2018-2023.
 - Violence Reduction: Safeguarding Those at Risk of Violence and Exploitation
This priority focuses on violence reduction, adopting a public health approach to tackling violence locally. The priority area will include Violence Against Women and Girls (VAWG), child criminal exploitation (CCE), child sexual exploitation (CSE), safeguarding children, street violence (including knife and gun crime), modern slavery, repeat victimisation and the physical and mental health impacts that violence can have. The Community Safety Partnership plan will align its approach to tackling these issues with the Violence, Vulnerabilities and Exploitation (VVE) Strategy 2021-24. Similarly, the plan is also in alignment with Tower Hamlets Violence against Women and Girls Strategy 2019-2024.
- 3.10 Our local policing priorities, set out by the Mayor's Office for Policing and Crime (MOPAC), are also a key feature within this plan. These are personal robbery, burglary and anti-social behaviour. Working in partnership to address

these issues, the Community Safety Partnership will also ensure it monitors and responds to other 'volume' crime types that pose an ongoing problem in the borough. It is anticipated that MOPAC will release a new Police and Crime Plan next year following the elections. As a result, this Community Safety Partnership plan will be updated to reflect the new local police priorities.

3.11 This plan places 'improving public confidence and trust' at the heart of its delivery model: with the partnership aiming to do this through delivering the four strategic priorities. It is a cross cutting theme that each of the four priorities listed in paragraph 3.4 will feed into. The plan sets out four ambitious intentions to improve public confidence and trust. These are:

- Improving ways of reporting crimes and ASB
- Further improving our community engagement
- Ensuring victims of crimes are at the heart of our response
- Improving the interaction between the police and the community

3.12 The new Community Safety Partnership Plan highlights the drivers of local crime and some of the underlying issues that contribute to criminality and reoffending, as listed below. These are again issues that have been and will be influenced by the wider impacts of the Covid-19 pandemic:

- Drugs Market: A substantial proportion of local crime is driven by substance misuse and an active drugs market: resulting in acquisitive crimes and serious violent offending. We know that substance misuse levels are high in the borough, making it a key driver to be addressed both through this plan and our Substance Misuse strategy.
- Mental Health: Some of those in contact with the criminal justice system suffer from mental health problems, with people particularly at risk during and after contact with criminal justice system. By identifying and addressing mental ill health at the earliest opportunity we can aim for the best outcomes for those people experiencing mental health issues and provide holistic support for people with complex and challenging needs. Again, we know that the number of people with mental health issues is comparatively high in Tower Hamlets and our commitments on this issue are articulated in our Substance Misuse Strategy.
- Community Cohesion: A thriving, cohesive and well-integrated community can help to reduce the risk of hate crime and the risk of extremism taking root. Tackling racism, misogyny, homophobia, transphobia and indeed all forms of discrimination is a key commitment in Tower Hamlets that is reflected in this plan and the borough's Community Cohesion Plan.

These will be addressed within each of the priority areas stated in paragraph 3.4 and will be cross thematic. The new Health and Wellbeing Strategy and the Organised Crime Profile will play a key role in addressing the health-related implications associated with crime and drug supply respectively.

3.13 We know that our strong record of partnership working is one of our key strengths, as are our diverse and active communities. We have therefore proposed a number of key principles are embedded within this new plan to define the partnership's approach to tackling the key priorities identified in this plan. These include:

- Early Help and Prevention
Focus on early intervention and prevention and the wider determinants of crime and community safety, including social inequalities, employment, skills, health, housing and environment
- Public Health approach to violence:
Focus on defining and measuring the issues contributing to violent offending and making use of existing resources, available funding and innovative projects to tackle it.
- Contextual Safeguarding:
Focus on contextual safeguarding, taking a whole-family approach and accounting for every context and environment that adolescents encounter beyond their family. This involves adopting a trauma informed approach, using a local understanding of the impact of adverse childhood experiences have on involvement in crime and ASB
- Resident involvement:
Coproducting solutions with our local community to understand local priorities and develop an approach that is responsive and effective in increasing feelings of safety.
- Collaboration:
Share data and intelligence and work across agencies to facilitate an efficient and effective approach and better targeted interventions.
- Supporting victims:
Ensure a focus on victims and strengthen local systems to support victims, reduce repeat victimisation, and recognise that perpetrators of violence can often be victims too.

How the Plan will be delivered

3.14 The Community Safety Partnership Board has the responsibility to deliver the priorities that are set out within this plan. This requires partner organisations to work together to share skills, knowledge and resource in order to effectively deliver a service that achieves our ambitions and makes Tower Hamlets a safer place to live in, work in and visit.

3.15 Tower Hamlets Community Safety Partnership Board has 7 strategic subgroups to drive the operational delivery. These are:

- Neighbourhood Crime and ASB Board
- Drugs and Alcohol Action Team Management Board
- Reducing Reoffending Board
- No Place for Hate Forum
- CONTEST Board
- VAWG and Domestic Abuse Strategy Group
- Youth Justice Management Board

3.16 The subgroups of the Community Safety Partnership produce their own action plans. These detail how they will address the relevant Community Safety Partnership priorities, setting ambitious targets that are reported into the CSP quarterly. Each subgroup action plan will be monitored at both the individual subgroup level and through priority performance indicators at Community Safety Partnership level.

3.17 The Safer Neighbourhood Board operates alongside Tower Hamlets Community Safety Partnership Board, ensuring that our local community has a voice and can contribute when making strategic decision.

3.18 Tower Hamlets Community Safety Partnership is one of a number of statutory partnerships operating across the borough. Some of the others include the Health and Wellbeing Board, Tower Hamlets Safeguarding Children's Partnership Board, and Safeguarding Adult's Board. Each partnership board has its own strategic priorities but there are many overlapping agendas. These include safeguarding, reoffending, young people entering the criminal justice system for the first time (First Time Entrants) and the associated social and health related challenges that impact on the level of crime, such as substance misuse and poor mental health. The Community Safety Partnership Board will therefore work with the other partnerships to ensure a joined-up approach is adopted.

4 EQUALITIES IMPLICATIONS

4.1 People's experience of crime, disorder, safety and services is not the same: Being a woman, being of a Black, Asian or minority ethnic background, being LGBTQIA, being disabled, having different gender to the one assigned at birth, being older or younger – for example - all has an impact. Some of these impacts are described below. We are clear in the CSP plan that we will continue to tackle inequality in relation to this as part of our borough-wide commitment to tackle inequality in all its forms.

4.2 Anyone can be a victim of domestic abuse, however 95% of perpetrators are men. Women are disproportionately affected by domestic abuse and other forms of VAWG. Gender inequality is understood to be an underlying factor in violence against women and girls. In addition, women are generally less likely to report they feel safe in public spaces compared to men.

4.3 People of a Black ethnic background are overrepresented in the criminal justice system and the plan incorporates the Mayor of London's

‘Transparency, Accountability and Trust in Policing Action Plan’ principles around better use of police powers, working together to make black [and minority ethnic] communities safer; and a police service that better represents and understands black [and minority ethnic] communities. There is often a disproportionate impact of crime on BAME communities.

- 4.4 Around 3 in 10 of all victims and all suspects, in recently recorded street-based knife crime, are aged between 19 and 25 years. The partnership’s understanding of which children and young people are vulnerable to harm will continue to be developed with equality monitoring and analysis considered annually. (Tower Hamlets Violence Vulnerability and Exploitation Strategy 2021-2024)
- 4.5 Hate crime can impact all protected characteristics, with ‘racist’ hate crime being the most prevalent in the borough, and ‘homophobic’ and ‘transgender’ hate crime being the fastest growing category. Issues including Brexit have had and might continue to have impacts on hate crime trends. The Community Safety Partnership aims to make Tower Hamlets a safer place to live, work, study and visit. The work of the No Place for Hate Forum contributes to ensuring Tower Hamlets represents a fair and equal society where those who do perpetrate hate are educated and or enforced against.
- 4.6 Further, the Tensions Monitoring Group (TMG) and the CONTEST Board aim to address community tensions and provide a strategic lead in addressing London’s threat, risks and vulnerabilities in relation to counter-terrorism respectively. Hate Crime, Community Cohesion and Extremism remains high priority for the partnership. Please refer to Priority 2 in the CSP Plan attached to this report as appendix A for further details.
- 4.7 People who are homeless are at increased risk of substance misuse and mental ill health is associated with homelessness, both as a cause and a consequence. (Advisory Council on the Misuse of Drugs (2019) Drug-related harms in homeless populations and how they can be reduced)
- 4.8 Tower Hamlets is the 5th most deprived area in London, with crime and substance misuse often clustered in areas of high social deprivation. This deprivation is likely to be a key driver behind health inequalities and the prevalence of smoking and drug and alcohol use in Tower Hamlets. (Substance Misuse Strategy 2020-2025)
- 4.9 Finally, there is a sense that whilst the Covid-19 pandemic has shone a light on existing inequalities, there is a risk that these may be further exacerbated going forward. This is an issue for the Community Safety Partnership Plan as it is for all our strategies and plans, and we are committed to tackling this through our priorities and actions.

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.

Best Value Implications

- 5.2 Through the new Community Safety Partnership Plan, the CSP will continue to scrutinise existing investment/resources and how it delivers services within the multi-agency context that it works within.
- 5.3 There are potentially significant efficiency gains from working in partnership to reduce crime and disorder in the borough. The Community Safety Plan 2021-24 is a partnership document and brings together key crime and disorder reduction agencies to work together and share resources.
- 5.4 There are also further efficiencies from addressing local problems before they escalate. This is intended to result in less resource being required to respond to local crime and disorder due to prevention and intervention before more serious problems at a later stage. These efficiencies would be spread across the Council and key partner agencies.

Environmental (including air quality)

- 5.5 Implementation of the Community Safety Partnership Plan 2021-23 is expected to have a positive effect on the environment, helping to reduce 'enviro-crime' (environmental crime) related anti-social behaviour. The plan will look to address criminal damage, graffiti, fly-tipping, fly-posting and other environmental crimes in the borough.

Risk Management

- 5.6 The Community Safety Plan sets out an overarching structure and framework of priorities within which management of risks will take place. There are no particular risk management implications attached to the plan itself.
- 5.7 There are risks associated with the harm caused by anti-social behaviour, crime and substance misuse in terms of the quality of life, health and wellbeing of residents. This includes mental health and wellbeing. These risks are increased for vulnerable victims.

Crime Reduction

- 5.8 The Community Safety Partnership Plan 2021-24 will seek to tackle crime, anti-social behaviour, substance misuse and re-offending. It will also address

the London Mayor's strategic priorities whilst reducing fear of crime, improving community cohesion and contributing to relevant community plan commitments.

Safeguarding

- 5.9 Tackling crime, anti-social behaviour and substance misuse has a significant link to safeguarding both vulnerable adults and children. Vulnerable adults and young people can be both victims and perpetrators of crime. The Plan, and subsequent delivery plans, place vulnerable adults and children at the heart of the priorities and aim to ensure that they are identified as well as offered the appropriate support needed to keep them and the rest of the community safe.
- 5.10 Effective prevention can reduce the likelihood of young people becoming involved in gangs, group offending, carrying knives and otherwise becoming involved in the criminal justice system. This Plan has been developed with partners in both Adults and Children's Safeguarding Boards as well as colleagues in Children's Services. It will contribute to improving and delivering effective safeguarding practice alongside other strategies such as the Violence, Vulnerability and Exploitation Strategy.

6 COMMENTS OF THE CHIEF FINANCE OFFICER

- 6.1 Any financial implications arising from the plan will be contained within existing financial resources and as such there are no financial implications for the revenue budget.

7 COMMENTS OF LEGAL SERVICES

- 7.1 The Crime and Disorder Act 1998 makes it a statutory requirement for the Council and the other responsible authorities in Tower Hamlets (e.g. the Chief Officer of Police) to formulate and implement strategies for: the reduction of crime and disorder; combating the misuse of drugs, alcohol and other substances; and the reduction of re-offending. In formulating and implementing such, regard must be had to the police and crime objectives set out in the police and crime plan for the relevant area. This has been taken into account in preparing this plan and will be updated to reflect any new local police priorities introduced following the Mayoral election in 2021.
- 7.2 The Community Safety Partnership Plan forms part of the Council's Budget Policy Framework and therefore its adoption is for Council in accordance with the Council's Constitution. The Budget and Policy Framework Procedure Rules require that the Mayor as the Executive has responsibility for preparing the draft plan for submission to the Council. Therefore, for this plan to be adopted, the Mayor in Cabinet must recommend it to Council.
- 7.3 Before adopting the Community Safety Partnership Plan, the Council must have due regard to its public sector equality duty under the Equality Act 2010

to eliminate unlawful conduct, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who do not.

Linked Reports, Appendices and Background Documents

Linked Report

- NONE.

Appendices

- Appendix 1 – Community Safety Partnership Plan

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

- NONE.

Officer contact details for documents:

N/A

Tower Hamlets Community Safety Partnership Plan 2021- 2024



TOWER HAMLETS



Tower Hamlets

Clinical Commissioning Group



LONDON FIRE BRIGADE
making London a safer city



APRIL 1ST 2021

Tower Hamlets

Authored by: Leo Hutchinson & Jack Kerr

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Foreword

We are very pleased to introduce Tower Hamlets Community Safety Partnership Plan 2021-2024, which sets out the priorities of Tower Hamlets Community Safety Partnership Board.

This plan sets out how to make the best use of existing resources, working together to reduce demand on our services by supporting community and individual responsibility. It is important we are all working towards the same goals, providing a safe environment for residents, businesses, and visitors. No single agency can address the complexities involved in keeping communities safe, so Tower Hamlets Community Safety Partnership will adopt a joined-up approach to achieve our goals.

Over the past three years, we have consistently reduced crime and helped make Tower Hamlets a safer place to live, work and visit. However, as a partnership, we know that we still have work to do to build upon our success and focus on new challenges. Our main focus will continue to be reducing crime and anti-social behaviour which means we will work to prevent crime and disorder, address substance misuse, reduce reoffending, and support our young and vulnerable people from being drawn into extremist behaviour.

We will work together to support victims of crime whilst also identifying perpetrators who wish to harm our community. We remain committed to tackling hate crime in all its forms and will continue to ensure Tower Hamlets is a place that stands against intolerance, hatred and extremism.

This plan acknowledges that the nature of criminality is changing. It sets out our approach to address 'hidden harm' crimes such as domestic violence, child sexual exploitation and serious organised crime. Many of the crime and disorder issues we will seek to address have underlying contributing factors, often linked to vulnerability and exploitation. By protecting those identified as vulnerable, we aim to reduce the risk of harm and prevent victimisation or repeat victimisation. Keeping young people safe is a key priority and we will continue to listen to their views throughout the course of this plan.

The priorities and key objectives set out in this plan are based upon an assessment of crime and disorder issues across the Borough and reflect the views of the community. We hope this document helps you understand what the Community Safety Partnership does and how we will achieve the aims set out through our priorities.

[INSERT PICS OF MAYOR LEAD MEMBER AND TWO PARTNERSHIP BOARD CHAIRS]

What is the Community Safety Partnership?

Community Safety Partnerships were set up under Sections 5-7 of the Crime and Disorder Act 1998. They are made up of representatives from police, local authorities, fire and rescue authorities, health and probation services (known as the 'responsible authorities').

The responsible authorities work together to protect their local communities from crime and to help people feel safer. They work out how to deal with local issues including antisocial behaviour, drug or alcohol misuse and re-offending. They annually assess local crime priorities and consult partners and the local community about how to deal with them.

The Crime and Disorder Act also introduced the principal aim of the youth justice system, which is to prevent offending and re-offending of young people under the age of 18. The formation of local Youth Justice Partnerships are central to this work and Tower Hamlets ensures our Youth Justice Management Board has a strong link with the Community Safety Partnership Board.

The aim of the Tower Hamlets Community Safety Partnership is to:

- Create a safer borough for people to live in, work in and visit
- Work in partnership to deliver local priorities that address crime and disorder
- Deliver local, regional and national priorities

To support this, every year we undertake a review of crime and drugs in our area, known as a Strategic Assessment. This is used to help inform what we commit to delivering in our Community Safety Plan.

The priorities set out in the previous CSP Plan (2017-2021) were:



What Have We Done?

For the duration of our previous Community Safety Partnership Plan, we were able to make substantial headway on achieving our aims through the delivery of projects, partnership working and placing victims of crime at the heart of our response to crime and disorder. We were able to:

Develop a Police led response to drug dealing, drug use and the associated criminality, called 'Operation Continuum'. This enables the Police to disrupt and enforce against perpetrators of crime and the ASB linked to drug dealing.

Recommission the entire drug treatment service provision to improve access to even better services that will support local residents who struggle with drugs and/or alcohol dependency and the associated complexities.

Develop a Joint Tower Hamlets and Hackney Serious Organised Crime (SOC) profile, using data and intelligence as the foundation for disruption and targeted action against organised criminals and networks that operate the drugs 'middle market'.

Hold a Mayor led violent crime summit in 2018 that set out actions to tackle violence in partnership - https://www.towerhamlets.gov.uk/Documents/Community-safety-and-emergencies/Community-safety/Violent_Crime_Summit_Statement_of_Action_2018_2019.pdf

Adopt a Public Health Approach to tackling violence, delivering a partnership knife action plan that aimed to reduce violent crime by addressing contributing factors to violent offending and developing a strategic plan setting out our approach to tackling related exploitation and vulnerability.

Recommission the Independent Domestic Violence Advocacy (IDVA) service to further improve services available to those affected by domestic abuse.

Create a Police Violence Suppression Unit, dedicated to tackling violence locally. Using an uplift in Police funding across London, Tower Hamlets have officers with the primary duty of tackling violent crime (including knife crime)

Develop a new model for tackling Anti-Social Behaviour – establishing a multi-disciplined Neighbourhoods Operations Service that patrols our streets, supports victims of ASB, manages ASB cases and targets problem locations.

Achievements Against 2017/21 CSP Plan Performance Indicators

Key: - **Aim Achieved** - **Needs more work** - **Aim Not Achieved**

Strategic Priority	Outcome	RAG Rating
ASB including Drugs and Alcohol	Improved reporting of ASB by 68% (+683 reports) compared to the previous year	Aim Achieved
	196 arrests for drug offences/drug supply through Operation Continuum	Aim Achieved
	4% reduction of those successfully completing drug/alcohol treatment and not returning to treatment within 6 months (by the end of March 2020)	Needs more work
Violence	Over 200 Violence Against Women and Girls (VAWG) champions	Aim Achieved
	7% decrease in reports of sexual offences	Aim Not Achieved
	Increase in the domestic violence conviction rate to 68% , when comparing 2019-20 figures to the previous year	Aim Achieved
Hate Crime, Community Cohesion and Extremism	20% reduction in faith hate crime offences when comparing figures from previous year	Aim Achieved
	204 Workshops to Raise Awareness of Prevent (WRAP) Training /Briefing Events to 5,412 attendees including engaging with staff and students from 29 schools .	Aim Achieved
	33% increase in new referrals of victims of hate crime	Aim Achieved
	20% increase in cases reviewed at the hate incident panel	Aim Achieved
Reducing Reoffending	6% reduction in knife offences	Aim Achieved
	25% reduction in Knife Crime Injury Victims under 24 years old	Aim Achieved
	22% reduction in gun crime offences	Aim Achieved
	34% reduction in the number of young people entering the criminal justice system for the first time	Aim Achieved

Key Legislation

There are a number of key pieces of legislation that govern the priorities in this CSP plan. Due consideration has been given to the following:

<p>Crime and Disorder Act 1998 Police and Justice Act 2006 Policing and Crime Act 2009</p>	<p>Domestic Violence, Crime and Victims Act 2004</p>	<p>Police Reform and Social Responsibility Act 2011</p>
<p>The Crime and Disorder Act 1998 gave statutory responsibility to local authorities, the police, and key partners to reduce crime and disorder in their communities. Under this legislation the responsible authorities commonly referred to now as Community Safety Partnerships (CSPs), were required to carry out three yearly audits and to implement crime reduction strategies.</p> <p>The Police and Justice Act 2006 introduced a number of amendments to the 1998 Act including the addition of anti-social behaviour and substance misuse within the remit of the CSP strategies. Reducing reoffending was subsequently added by the Policing and Crime Act 2009.</p>	<p>The requirement for Community Safety Partnerships to conduct Domestic Homicide Reviews came into effect on 13th April 2011 as a result of the Domestic Violence, Crime and Victims Act (2004).</p>	<p>The Police Reform and Social Responsibility Act 2011 introduced directly elected Police and Crime Commissioners (PCCs) to replace Police Authorities in England and Wales. This brought with it a requirement for the PCC to have regard to the priorities of the responsible authorities making up the CSPs and for those authorities to have regard to the police and crime objectives set out in the Police and Crime Plan. The legislation also brought with it a mutual duty for the PCC and the responsible authorities to act in co-operation with each other in exercising their respective functions.</p>
<p>The Anti-Social Behaviour, Crime and Policing Act 2014</p>	<p>Safeguarding</p>	<p>Counter Terrorism and Security Act 2015</p>
<p>The Act introduced simpler more effective powers to tackle anti-social behaviour to provide better protection for victims and communities including a new Community Trigger and Community Remedy to give people a greater say in how agencies respond to complaints. Updated statutory guidance from the Home Office released in December 2017 has brought greater clarity around the use of the tools and powers introduced by the Act.</p>	<p>Between 2014 and 2016 a number of pieces of legislation were introduced to provide authorities with additional tools, powers and statutory duties to tackle community safety and safeguarding issues. Including the Care Act 2014, Counter-Terrorism and Security Act 2015 (and subsequent amendments in 2019), Serious Crime Act 2015, Modern Slavery Act 2015 and Psychoactive Substances Act 2016. These pieces of legislation introduced a range of duties including new reporting, referral and decision-making mechanisms, staff awareness requirements and impacts on contract management to be included in the everyday work of relevant organisations.</p>	<p>The Counter-Terrorism and Security Act 2015 places a legal duty on local authorities "when exercising its functions, to have due regard to the need to prevent people from being drawn into terrorism". Prevent is one of four strands of the government's counter-terrorism strategy, and aims to stop people becoming terrorists or supporting terrorism.</p> <p>Section 36 of the CTSA places a duty on local authorities to ensure that a Channel panel is in place for their area that provides support for people who are identified as being vulnerable to being drawn into terrorism.</p>
<p>Domestic Abuse Bill 2020</p>	<p>Serious Violence Bill 2019/20</p>	<p>Future Arrangements for Community Rehabilitation Companies (CRCs):</p>
<p>Although it is not yet law the proposed changes will impact on victims and their families and the agencies that support them by improving the response to domestic abuse. Some of the recommended changes include a statutory definition of domestic abuse; introduction of a Domestic Abuse Commissioner; a new domestic abuse protection notice and order; a new duty on local authorities in England to provide support to victims and their children in safe accommodation etc. This is an evolving piece of draft legislation but Community Safety partners welcome the potential changes that new legislation could bring.</p>	<p>In 2019/20 the Home Office ran a consultation on a new legal duty to support a multi-agency approach to preventing and tackling serious violence. The outcome was a decision to bring forward legislation to create a new duty on organisations to collaborate, where possible through existing partnership structures, to prevent and reduce serious violence. In addition, there is an intention to amend the Crime and Disorder Act 1998 to ensure serious violence is an explicit priority for CSP'S, in recognition of the important role of CSPs. Although legislation has not yet been introduced Community Safety partners are already working together to address serious violence as appropriate.</p>	<p>Following a public consultation, 'Strengthening Probation' July to September 2018, the Ministry of Justice set out its plans to renationalise the case management of adults under probation supervision in England and Wales. This means that the National Probation Service (NPS) will take over responsibility for all case management.</p>

What Do We Know?



Population

The estimated population of Tower Hamlets is **331,620** with **125,820** Households. **16%** of households are overcrowded.



Median age

The most common age groups in the borough are **25-29** and **30-34**: both of which represent **14%** of the total population.



Borough Diversity

More than **two thirds (69%)** of the borough's population is attributed to minority ethnic groups (i.e. not White British): **55%** belong to BME (Black and Minority Ethnic) groups and a further **14%** are from White minority groups.



Employment

62% of residents are employed. **9.6%** unemployed.



Average Earnings

The average annual earnings for full time working residents in Tower Hamlets is **£37,603**.



Deprivation

Tower Hamlets Rank has fallen from **24th**, in terms of the proportion of local super output areas (LSOAs) in the worst 10% nationally, to **175th**.



Life expectancy

Healthy life expectancy in Tower Hamlets is **57.2** for women and **61.9** for men. Life expectancy is **79** for women and **82.9** for men.



Crime

The total number of reported criminal offences in 2019/20 was **34,657**. When compared with other London boroughs, Tower Hamlets rank **7th**



Health

50.6% of Tower Hamlets residents think they are in very good health.

What Does Our 2020 Strategic Assessment Tell Us?

ASB Including Drugs and Alcohol



Reports of Anti-Social Behaviour to police have increased by 14.5% compared to the previous year



Tower Hamlets has the highest prevalence of opiate and crack cocaine use in London, contributing to an active drugs market.



The Community ASB MARAC heard 103 cases of vulnerable victims affected by ASB

Reoffending



There was a 9% reduction in the Youth Reoffending rate when compared to the previous year



Young people entering the Youth Criminal Justice System for the first time, saw a 17% increase



The adult reoffending rate increased by 11% when compared to the previous year: rising to 26%

Hate Crime, Community Cohesion & Extremism



Reports of hate crime to police have stayed at a similar level: reducing by 1.4% compared to the previous year



20% reduction in faith hate crime offences



Total hate crime has reduced but there was a notable 35% increase homophobic hate crime

Violence



25% reduction in Knife Crime Injury Victims under 24 years old



18 local young people were identified by Rescue and Response as being linked to county lines



Compared to the previous year, violence has reduced: showing a decrease of 3%.

COVID-19



The Coronavirus pandemic has had a significant impact on the way we deliver services. It affects all communities and evidence shows health and economic impacts disproportionately affect poorer people. It's important we understand the challenges we face and deliver services in new and innovative ways. The longer-term impacts of COVID-19 on communities is still unknown.

Overall Crime



Total crime and disorder rates in Tower Hamlets have remained at a similar level compared to the previous year: with a 0.13% decrease

Brexit



It's unclear what impact Brexit will have on communities, however we will ensure we're aware of emerging issue, especially those relating to hate crime and community cohesion.

Crime and COVID-19

The COVID-19 pandemic has had significant and wide-ranging impacts on crime and disorder. This is reflected nationally and across London. The Community Safety Partnership (CSP) has been responsive to the changing demands and emerging issues that have presented themselves: specifically increases in hate crime, domestic abuse, and a significant rise in anti-social behaviour.

Plans have had to be adapted in response to the pandemic, but operational delivery has been maintained. The policing of COVID restrictions required co-ordination between the police and council services to tackle behaviour ranging from a lack of social distancing to organised unlicensed music events. This has been a demand on all partner resources.

A recent [Healthwatch report](#), focussing on capturing young resident's experience during COVID-19, highlighted their views on drugs and violence. Some of our young participants said:

"I do feel like, because the focus has been on COVID, there's other stuff that is being like overlooked. Stabbings and stuff are still happening and I ain't gonna lie, especially after George Floyd, getting the police involved can't be the answer" 21, Somali, Female, Harford Health Centre

"An issue that has been bad even when I was in secondary school is the violence in the streets, especially in the youth as even knife crime rates in themselves have been increasing tremendously which makes it always a bit of a worry to go out " 19, Male, Bengali, East One Health

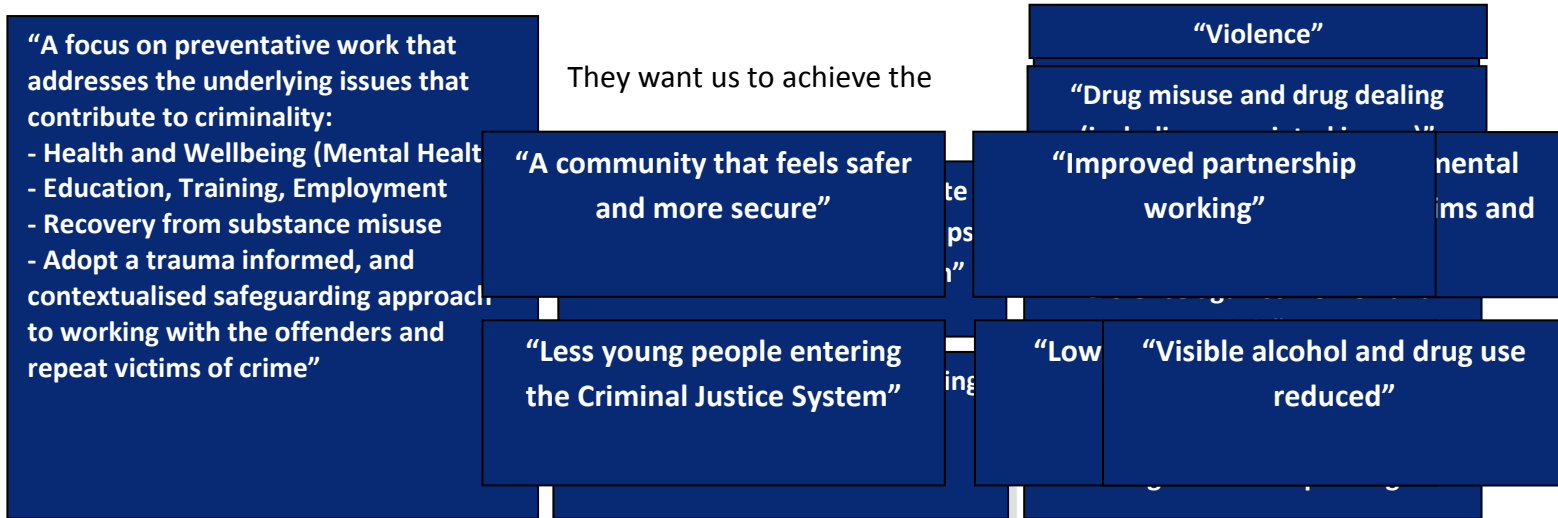
"[...] I can tell that there are problems with other teenagers who are my age falling into struggles regarding drug misuse and obtaining illegal drugs. Many people my age have now given up on studies and just become addicted to drugs or sell drugs, and it hasn't gotten better during COVID [...]" 16, Male, Bengali,

There is a mixed opinion on how these issues should be dealt with in Tower Hamlets, but it is evident that despite lockdown, criminal activity still continues. Whilst the challenges remain in one of the toughest economic climates seen in decades, and reductions in budget allocations which will inevitably impact upon service provision, the partnership will face difficult decisions about the way we go about our business.

Nonetheless, we will make the best use of existing resources, working together to reduce demand on our services and support communities and individuals during to both remain and feel safe.

What did our Consultation with CSP Partners Tell Us?

Consultation¹ with community safety partners told us what they thought would be best to address in our local plan:



following by the end of this plan in 2024

DRAFT

“All children, particularly those who are most vulnerable, fully engaged in services available to support them (e.g. attending school, mental health services)”

“Improved community resilience and empowerment – resulting in less demand on services”

¹ Based on separate interviews with all of Tower Hamlets Community Safety Partnership

What did our Resident's Feedback Tell Us?

ASB

Of the 224 residents who responded to a survey to help the development of this plan, 83% think ASB is a serious problem. Of the 83% who view ASB as a serious problem, 49% reported ASB as a "very significant issue". This is in comparison to 42% of respondents reporting crime as a serious problem (with 11% claiming it's a "very significant issue")

Type of ASB

Drug use and drug dealing (88% of respondents), Nitrous Oxide (79%), and Speeding or abandoned cars (66%) were overwhelmingly identified as the main issues people had in terms of ASB. Groups of youths congregating late into the night, partying on the street and making noise was also referenced by large cohort of respondents, as was 'dog fouling' and 'Fly tipping'.

Noise Nuisance

Of the 224 residents who responded to a survey to help the development of this plan, 48% think noise nuisance is a big problem. The majority of respondents reported that it wasn't "noisy neighbours" that were the issue, but rather groups of youths coming into their local area and congregating late into the night, often driving cars dangerously and revving engines loudly

Exploitation

Consultation for the Violence, Vulnerability and Exploitation Strategy heard how young people's concerns included those in care settings, children from one parent families, and children where there are mental health problems in the family. Support needed included mentoring support, and the importance of effective interventions against those identified as exploiting young people.

Violence against women and girls (VAWG)

In developing the VAWG strategy 2019-24, we were told

- 15% of service users said they had felt suicidal due to abuse they experienced
- 21% of service users said they had experienced ill mental health
- 6% of service users said they had experienced an addiction
- 27% of service users said they had been a victim of child abuse and /or witnessed abuse in the home as a child
- 28% of service users had experienced homelessness

Effectiveness of CSP

Of the 224 residents who responded to a survey to help the development of this plan, 53% feel that Tower Hamlets CSP is not effective at addressing crime, disorder, substance misuse and reoffending. A number of respondents noted this was because they were not well informed of the efforts being made by the CSP. Others stated that the absence of police on the streets led to reduced confidence.

Drugs

Of the 224 residents who responded to a survey to help the development of this plan, 80% felt drugs and drug dealing is a very serious issue. Drugs and drug dealing have been noted as a key issue by residents. Respondents identified visible drug dealing from cars, Nitrous Oxide use (visible cannisters), weed (constant smell on streets), and associated ASB as their main concerns

Substance Misuse

Consultation for Tower Hamlets Substance Misuse Strategy 2020-2025 revealed the majority of stakeholders and residents supported a three strand approach which focuses on early intervention and **prevention**, evidence based treatment and recovery support, and reducing drug and alcohol related crime and anti-social behaviour.

- Around 25 different emerging priorities were suggested, covering a wide range of themes. However, key priorities were community involvement and research & intelligence followed by targeted enforcement and better partnership work

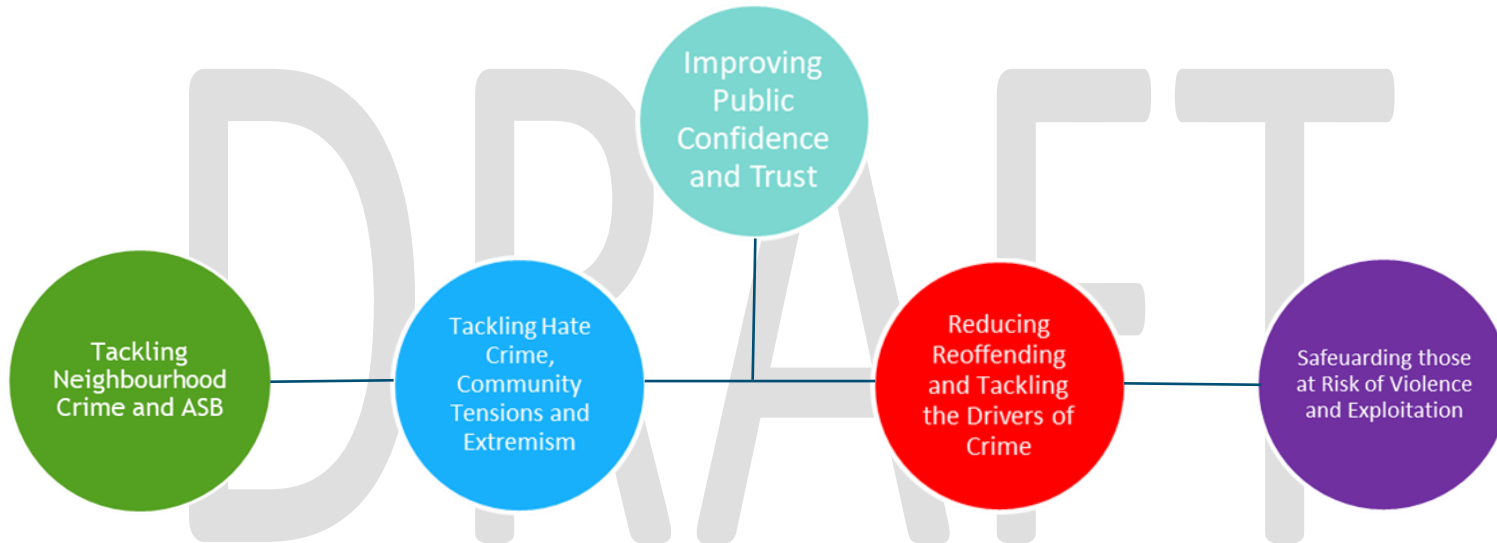
Violence

Consultation for Tower Hamlets Violence Vulnerability and Exploitation Strategy 2021-24 revealed the majority of stakeholders and residents advocated for a three strand approach which focuses on

- prevention and early intervention, protection,
- Protection and ongoing support for children for children and young people at the highest risk of harm and those who are survivors
- Disrupting and pursuing those who pose a risk to children and young people

Community Safety Priorities 2021-2024

This plan sets out four priorities for Tower Hamlets CSP. They aim to address the Council's strategic outcome, "People feel safer in their neighbourhoods and anti-social behaviour is tackled", which is also shared by the partners that are members of the Community Safety Partnership. We hope that by addressing local issues like these within our strategic priorities, we will be able to improve public confidence and trust in local policing and community safety partners to make Tower Hamlets safer.



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The police also have local policing priorities. These are:

- Personal robbery
- Burglary
- Anti-Social Behaviour (ASB)

Working in partnership to address these issues, the CSP will ensure it monitors and responds to other 'volume' crime types that pose an ongoing problem in the borough.

There are three crosscutting themes that the plan will incorporate to address crime and disorder locally. These include:

- A contextual safeguarding approach
- Prevention and early intervention
- Coproducing solutions with local people and organisations that address local crime

Principals and Cross Cutting Themes

Public Health Approach

Focus on early intervention and prevention, and the wider determinants of crime and community safety, including social inequalities, employment, skills, health, housing and environment

Contextual safeguarding

Focus on contextual safeguarding, taking a whole-family approach and accounting for every context and environment that adolescents encounter beyond their family. This involves adopting a trauma informed approach, using a local understanding of the impact of adverse childhood experiences have on involvement in crime and ASB

Resident involvement:

coproducing solutions with our local community to understand local priorities and develop an approach that is responsive and effective in increasing feelings of safety.

Collaboration:

Share data and intelligence and work across agencies to facilitate an efficient and effective approach and better targeted interventions.

Supporting victims:

Ensure a focus on victims and strengthen local systems to support victims, reduce repeat victimisation, and recognise that perpetrators of violence can often be victims too.

The following principles will guide our strategic approach and run through this Plan:

We are committed to a joined-up approach that addresses drivers of crime and the underlying issues that affect levels of anti-social behaviour (ASB), crime and reoffending. This includes:

Drugs

- We know that a substantial proportion of local crime is driven by substance misuse and an active drugs market: resulting in acquisitive crimes and serious violent offending. Consideration of Tower Hamlets' drugs market will be a cross-cutting theme across our strategic priorities and partners will work in partnership to address both substance misuse through treatment and disrupting drug markets through enforcement activity.

Mental Health

- Some of those in contact with the criminal justice system suffer from mental health problems, with people particularly at risk during and after contact with the criminal justice system. By identifying and addressing mental ill health at the earliest opportunity we can aim for the best outcomes for those people experiencing mental health issues and provide holistic support for people with complex and challenging needs.

Community Cohesion

- A thriving, cohesive and well-integrated community can help to reduce the risk of hate crime and the risk of extremism taking root. The Council and relevant partners will continue to monitor community tensions and promote social integration to encourage an environment where people of all backgrounds come together as one community. Our Community Cohesion Plan 2020-2025 sets out our priorities and commitments to strengthen cohesion in the borough.

To ensure Tower Hamlets has a cohesive and integrated community that feels fairly treated and represented across the Partnership, we must also acknowledge the national evidence that highlights that the youth justice system treats children and young people (10 to 18-years-old) from ethnic minority backgrounds differently.

Children and young people from BAME backgrounds are over-represented at most stages of the youth justice system. The Lammy Review (2017) highlighted that BAME defendants were more likely to enter a not guilty plea at court, resulting in harsher sentencing and a longer time spent in the justice system.

In Tower Hamlets, we believe that a partnership approach is key to reducing disproportionality and ensuring partners understand the experiences of BAME children and young people.

The Lammy Review highlights that “the best way to ensure fair treatment is to subject decision-making to scrutiny”. Knowing the realities that BAME young people face and understanding the adverse experiences of institutionalised racism is key in helping hold organisations to account and improving the systems to support and protect children, young people and their families - regardless of their ethnicity.

As part of our commitment to explore and address disproportionality, Tower Hamlets Youth Offending Partnership held a Spotlight focus session on disproportionality on 1 July 2020. An Action Plan was produced with measurable, time-actioned targets assigned to a range of services and partner organisations. This will ensure that disproportionality is kept at the forefront of the work of both the Youth Justice Service and the Youth Justice Management Board.

How We Will Work in Partnership

Delivering our priorities:

The Community Safety Partnership Board (CSP) has the responsibility to deliver the priorities that are set out within this plan. They are also responsible for delivering the Violence Vulnerability and Exploitation Strategy, the Substance Misuse Strategy and Violence Against Women and Girls (VAWG) Strategy.

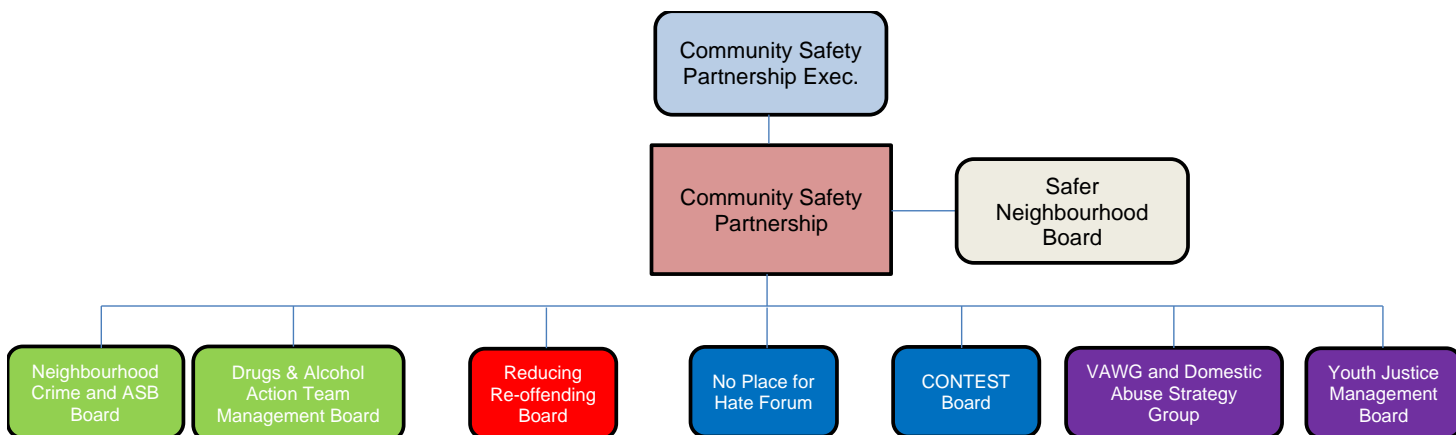
This requires partner organisations to work together to share skills, knowledge and resource in order to effectively deliver a service that achieves our ambitions and makes Tower Hamlets a safer place to live in, work in and visit.

The CSP has 7 strategic subgroups to drive the operational delivery. These are:

- Neighbourhood Crime and ASB Board
- Drugs and Alcohol Action Team Management Board
- Reducing Reoffending Board
- No Place for Hate Forum
- CONTEST Board
- VAWG and Domestic Abuse Strategy Group
- Youth Justice Management Board

Safer Neighbourhood Boards operate in every London Borough, bringing police and communities together to decide local policing and crime priorities, solve problems collaboratively and make sure that the public are involved in a wide range of other community safety decisions.

In Tower Hamlets, we ensure the Safer Neighbourhood Board (SNB) operates alongside our CSP so that our local community is considered and can contribute when making strategic decision. The governance structure can be seen below.



Working with other Partnership Boards on Shared priorities:

The CSP works closely with other strategic partnership boards: the Safeguarding Adults Board, Health and Wellbeing Board and Tower Hamlets Safeguarding Children Partnership (THSCP).

Each board has its own strategic priorities but there are many overlapping agendas. These include (but is not limited to):

- Adult and Children's Safeguarding
- Violence
- PREVENT, Counter Terrorism and Extremism
- Reoffending
- Health harms related to drugs and alcohol

The Community Safety Partnership adopts the mantra that *'crime is everybody's business'* and that there must be a strong emphasis on working collaboratively, across the system, on common priorities.

We have committed to this, as part of our Violence Reduction Plan, through 'assessing our local co-ordination arrangements between the Community Safety Partnership, Safeguarding Children and Adults Boards and the Health and Wellbeing Board, to support a public health approach to reduce violence'.

The Tower Hamlets Partnership Co-ordination Group (PCG) also takes this into consideration and brings together each of the partnership board leads to discuss processes of the individual boards, to better co-ordinate between them.

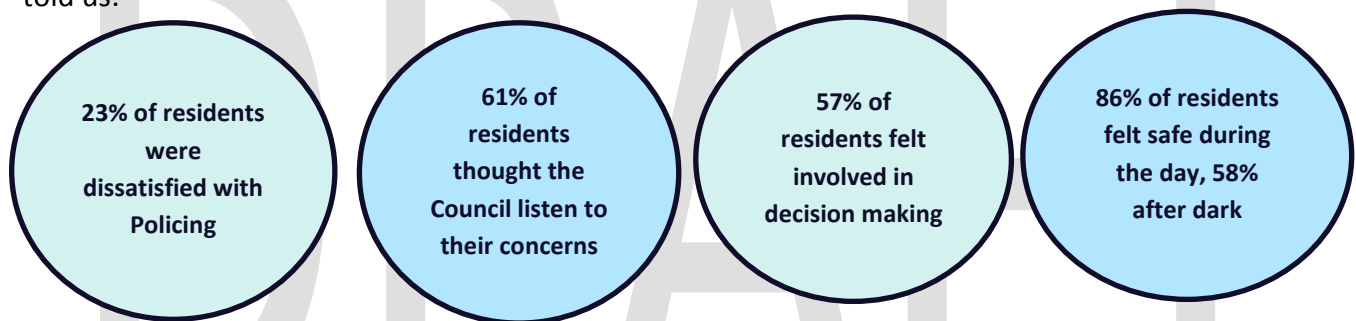
This forum has an established plan to enable each of the board leads to see major events affecting each of the partnership boards, such as the launch of new strategic plans, meeting dates and their individual work plans.

Improving Public Confidence and Trust

This plan will place a strong focus on improving the confidence and trust our local community has in the work of the Community Safety Partnership as a whole, as well as Policing.

We understand that the perception of crime and safety for our local people can be starkly different to the reality of the issues our residents are concerned about. As such we conduct annual resident's surveys and monitor public perceptions data to ensure we are responding to the issues that our local communities tell us are an issue.

In September 2020, Police Public Perceptions data showed that 65% of residents believed that 'the police could be relied upon to be there when needed'. This is a reduction from the 83% ranking in March 2017 just before the previous Community Safety plan. The 2018-19 Annual Resident's Survey told us:



To improve the confidence and trust our residents have in community safety and policing, we will:



Monitoring Focus – What we will do

To achieve our objectives, we know that there are measures that need to be put in place. We will:

- Hold an Annual Community Safety Partnership Public Meeting, ensuring senior CSP partners are public facing and engage our local community.
- Safer Neighbourhood Board (SNB) – Continue to operate our SNB allowing residents to hold the Police to account for delivering local policing priorities, monitoring performance and working collaboratively with police on crime and disorder issues.
- Ensure our Ward Panels allow residents to have active involvement in neighbourhood community safety issues and setting local priorities. We also will aim to have ward panels that

are representative of our local communities as well as capture the voices of those whose concerns aren't often heard

- Perceptions of fair treatment (Public Attitudes Survey) – increase perceptions of fair treatment by at least 5% on the measure 'police treat everyone fairly regardless of who they are'.
- Monitor and respond to any increase in community tensions through the multi-agency Tensions Monitoring Group (TMG).
- Community Monitoring group - monitoring stop and search and intrusive police tactics.
- Adopt the four principles of the Mayor of London's [Transparency, Accountability and Trust in Policing Action Plan](#) locally to work towards a fairer and more equal community. The principles are:
 - Better use of police powers – to ensure the proportionate use of police powers
 - Work together to make black [and minority ethnic] communities safer
 - A police service that better represents and understands black [and minority ethnic] communities
 - Holding the police to account for what they do

Locally, the Police have developed an action plan to start to address the recommendations from the Mayor of London's Plan.

Priority 1 – Tackling Neighbourhood Crime and ASB

Key areas of focus:

• ASB (including the use of Nitrous Oxide) • Community Triggers • Public Space Protection Order • Targeting Problem Locations • Designing Out Crime • CCTV • Burglary • Fires

Why is this a priority

- Tackling ASB is one of the biggest challenges we face in Tower Hamlets. Trends in resident perceptions on the different types of ASB consistently come up as drunk and rowdy behaviour in public places, people using or dealing drugs and litter from the use of Nitrous Oxide (NOX) canisters lying around.
- Data from the single month of September 2020 highlighted **526** NOX canister sightings
- Reports of ASB to the police increased by **14.5%**, with repeat calls increasing by **14.8%** compared to the previous year. ASB cases reported to the council increased by **68%**.
- Neighbourhood crime and disorder has a significant impact on the community: vehicle fires, arson attacks, crimes for gain like burglary and the sale of alcohol to those under age.

Our aims and strategic intentions

- Continuously deliver a victim focused response to ASB
- Address the full spectrum of ASB from littering and graffiti to nitrous oxide and drug related ASB
- Safeguard vulnerable victims and perpetrators of ASB, working in partnership with the safeguarding adults board and safeguarding children's partnership
- Improve our understanding of ASB to deliver a more informed approach to tackling the underlying drivers of demand
- Work with partners and residents to address neighbourhood and crossborder issues
- Tackle irresponsible business practice through licencing and trading standards functions
- Working in partnership to improve fire safety and fire prevention
- Continue to tackle acquisitive crimes like burglary with a focus on prolific offenders

Outcomes we want to achieve

- Reduce repeat victimisation
- Comprehensive ASB profile for Tower Hamlets to inform operational tactics
- Reduce the impact of the night time economy
- Residents report ASB via the correct channels
- Fewer deliberate fire incidents

How Will We Address Neighbourhood Crime

Tackling Anti-Social Behaviour (ASB)

Our approach to tackling ASB will be centred around addressing the issue at neighbourhood level. By focusing on problematic locations, we will aim to reduce the impact it can have on residents and communities. We will implement a holistic approach to tackling ASB and will involve:

- Robust use of ASB enforcement powers
- Provide effective support to ASB victims in a neighbourhood setting (commissioning support services like Victim Support).
- Introduce a borough-wide Public Spaces Protection Order to ban the recreational use of nitrous oxide, which causes harassment, alarm, distress, nuisance or annoyance
- Upgrade our CCTV system so we can continue to deter and detect crime and ASB (including environmental crimes)
- Address drug dealing through the implementation of Operation Continuum
- Bring statutory and non-statutory partners together to tackle neighbourhood ASB via a new strategic partnership board
- Tackle fire related ASB by investing in the education and development of young people at an impressionable age (Fire Cadets, Junior Citizens and Juvenile Fire Setters Scheme).
- Address cases where vulnerable victims and perpetrators of ASB are involved through a multi-agency risk panel.
- Tower Hamlets Housing and registered providers working with the Police, making proactive use of the Civil Injunction Powers.
- Our designated Protective security and Crime Prevention Manager will provide expert knowledge on 'designing out crime'

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Safer Neighbourhoods

Improving the safety local neighbourhoods was a key part of the Mayor of London's Police and Crime Plan for 2017-2021: with our plan embodying the Mayor's commitment to make our local neighbourhoods safer. Through the Safer Neighbourhood Board (SNB) and local Ward Panels, residents will continue to work alongside police to solve problems collaboratively and contribute to community safety decision making. The SNB will continue to enable residents to hold Police to account: ensuring stop and search powers are used fairly and consistently, locally agreed priorities are delivered and police answer to local concerns. Through the following mechanisms, Tower Hamlets will keep neighbourhoods safe:

- Ward Panels – Police and Council addressing local concerns
- Community Trigger - Allowing members of the community to ask the Community Safety Partnership to review their responses to unresolved complaints of ASB.
- Public Space Protection Orders – Enforce against those who commit alcohol related ASB and individuals/groups that use nitrous oxide canisters.
- Neighbourhood Management Project – Partnership board that aims to tackle crime and ASB in the wards with the highest number of Police 101 calls, drug and crime incidents across the borough.

Tackling Local Crime and Disorder

Our partnership approach to tackling crime and disorder will consist of the following:

- Partnership Task Force (PTF) – Deploy Council funded Police officers and task them to problem locations, informed by intelligence and data.
- Burglary and Robbery Investigation Team (BRIT) – Police team specifically focused on tackling burglaries and robberies in Tower Hamlets
- Tower Hamlets Homes (THH) Police – THH funded Police officers tasked to problematic estates and localities across the borough.
- Tasking Meetings – Joint meetings used to respond to emerging issues and problem locations, identifying required actions to satisfy local issues.

and ASB?

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Priority 2 – Tackling Hate Crime, Community Tensions and Extremism

Key areas of focus:

- Hate Crimes · Community Tensions · PREVENT · Community Cohesion
- Protective Security

Why is this a priority

- Tower Hamlets is a diverse borough where most people treat each other with respect and dignity. Unfortunately there are some who don't hold those same values, perpetuating hate.
- There was a 35% increase in Homophobic hate crime in 2019-20 despite the reduction in total hate crime offences.
- Following on from the social injustices highlighted by the killing of George Floyd, we recognise the devastating human consequences of systemic oppression and in line with the Mayor of London's intention to improve transparency, accountability and trust in Policing. As such, hate crime and community tensions remains a high priority for Tower Hamlets.
- PREVENT is about keeping people and communities safe from the threat of terrorism and we are committed to delivering this part of one of the four strands of the government's counter-terrorism strategy.
- PROTECT or Protective Security is also part of the government's counter-terrorism strategy and it aims at improving the safety and security of crowded places in the Borough through preventative, physical measures.

Our aims and strategic intentions

- Increase confidence of victims to report incidents of hate crime
- Ensure staff are trained on reporting hate crime/hate incidents outside of the police
- Encourage more residents to be 'supportive bystanders' if hate incidents are witnessed
- Support victims of hate crimes
- Safeguard those at risk of radicalisation and continue to work with the community through the Independent PREVENT Advisory Group
- Ensure frontline professionals are trained in the PREVENT duty and referral process
- Maintain a strong focus on community cohesion activities and tensions monitoring
- Work with the Police Counter Terrorism Security Advisors to improve the resilience of the built environment

Outcomes we want to achieve

- Improved confidence to report hate crime
- Increased support and protection for victims of hate crime
- Increased training and awareness of hate crime within communities
- Build cohesion and resilience within local communities
- Improved public perception of feeling the police treat everybody fairly regardless of who they are
- Ensure people know what to do if concerned about someone who is vulnerable to radicalisation or you think is being radicalised
- Achieve a 10% Sanction detection rate for hate crime offences

Hate Crime

Our approach to tackling hate crime adopts a partnership approach, with various agencies and members of the community all supporting one another in our efforts. This includes:

- Victim Support provides victims of hate crime with support following a reported incident.
- Our Local Police and the Council have a dedicated Hate Crime team designed to support and give advice to those who have witnessed or been a victim of hate crime.
- We will continue to operate our local Hate Incident Panel which brings together key partners to resolve complex hate crime cases
- Tower Hamlets 'No Place for Hate Forum' brings key partners together to deliver an annually refreshed action plan that includes prevention and early intervention work, support for victims, staff training, awareness campaigns, and working with partners to ensure enforcement action

Community Tensions

The Tension Monitoring Group (TMG) is a body that addresses community tensions requiring a coordinated response from multiple services and local community stakeholders. The TMG may address actual tensions where there is evidence of significant impact on the community, or potential tensions where there is a high likelihood of significant impact. The following community tensions and cohesion matters fall within the remit of the TMG:

- Tensions affecting the local community as a whole or large parts of the community, multiple levels of society or with the potential for social disorder, or
- A single incident, where escalation is likely, or affecting a large proportion of the community, or requires further consideration even after being actioned by another forum or panel (e.g. Hate Incident Panel), or
- A serious violence incident or a series of serious violence incidences.

The TMG meets quarterly and can convene at short notice in the event of a critical or serious incident affecting community tension.

Extremism

Prevent is a part of the Government's national counter-terrorism strategy. Our Prevent programme in Tower Hamlets includes 'Channel', a multi-agency panel consisting of the local authority, Police, health and education professionals and other key interested stakeholders designed to safeguard vulnerable children and adults from being drawn into violent extremism or terrorist related activity. As part of Prevent, we also:

- Deliver training for frontline staff in recognising, referring and responding to radicalisation
- Commissioning projects to build capacity, increase resilience and improve understanding of extremism and radicalisation with partners such as schools, colleges, frontline staff, community groups, venues and parents

We also play a key role in empowering the Community. We mentor and support grassroots organisations in producing and delivering counter extremism projects by assisting them to access funding through various sources including London Mayor's Office for Policing and Crime, and central government. Additionally, we provide support to places of worship in securing funding to improve security at places of worship premises. Lastly, we provide training and resources to ensure partner organisations are kept well informed about extremist narratives to ensure counter extremism measures in the borough remain relevant and effective.

Priority 3 - Reducing Reoffending and Tackling the Drivers of Crime

Key areas of focus:

- Drugs and Alcohol Substance Misuse (Treatment, Prevention, Enforcement) • Targeting Offenders (IOM, MAPPA) • Drug Market (Continuum) • Serious and Organised Crime • Rough Sleeping

Why is this a priority

- We know that drugs are a driver of crime in Tower Hamlets and is one of our residents top concerns with regards to drug dealing and visible drug use. **88%** of respondents to our public consultation highlighted drugs as an issue. Drugs are often distributed by organised criminal networks and requires a partnership response to address the wider impact they have on our local communities.
- Some offenders have troubled lives with complex needs and in many cases contribute to their offending behaviour. Some of these factors include health related issues (including mental health), accommodation, drugs and alcohol and attitudes (thinking/behaviour).
- The adult reoffending rate increased by **11%** compared to the previous year: rising to **26%** of offenders committing further offences. Youth reoffending decreased but still stands at **34%**.

Our aims and strategic intentions

- Increase support to offenders with access to housing, ETE, financial aid, debt recovery and drugs and alcohol service
- Work in partnership to reduce reoffending
- Support those who misuse drugs and/or alcohol to successfully complete community/facility based treatment
- Enforce against persistent/prolific offenders who misuse drugs/alcohol
- Address drugs, as a driver of crime, and associated criminalities through innovative initiatives
- Implement the refreshed Integrated Offender Management (IOM) framework that emphasises a more consistent and evidence-based approach to managing offending behaviour
- Protect the public from prolific offenders through Multi-Agency Public Protection Arrangements (MAPPA)
- Review opportunities to improve referral rates to drug and alcohol services
- Continue to provide support for young people who are involved in offending, and reduce /First Time Entrants (FTEs) to the criminal justice system
- Work in partnership, locally and nationally, to disrupt and prevent serious and organised crime to reduce the impact of its resulting social harms on communities and residents

Outcomes we want to achieve

- Visible drug and alcohol use and dealing reduced
- Reduction in reoffending rate for adults and juveniles
- Reduce reoffending behaviour through Integrated Offender Management (IOM)
- Fewer first time entrants (FTEs) into the criminal justice system
- Fewer people 'sleeping rough' in Tower Hamlets
- More people successfully completing treatment and not returning to the service for treatment within a 6 month period

How Will We Reduce Reoffending, and Address the Drivers of Crime?

Reducing Re-Offending

We will target persistent offenders through the rollout of a refreshed London wide 'Integrated Offender Management' (IOM) framework that emphasises a more consistent and evidence-based approach. Latest data reveals the number of offenders on the IOM framework has increased by 39% between 2013-2019 across London. Violent offending amongst this cohort has increased by 30% over that same period. The refreshed IOM framework for London, introduced in October 2020, will focus on persistent violent offenders, and will also maintain a focus on priority acquisitive offences, particularly robbery and burglary. Key CSP partners including the Council, the Police, and Probation services in Tower Hamlets all have a key role to play in the rollout of this new framework that is due to be implemented from April 2021 in Tower Hamlets and across London.

Address Rough Sleeping

Our 'Homelessness and Rough Sleeping Strategy (2018-2023)' sets out how we will prevent homelessness, including rough sleeping, and support those who face homelessness or who are at risk of becoming homeless. Genuine offers of support and accommodation will always be our main approach to end rough sleeping. However, where this approach is consistently unsuccessful, we will work closely with enforcement agencies and the wider community as a partnership to reduce anti-social behaviour.

Address Drugs, and Alcohol Substance Misuse

Our 'Tower Hamlets Partner Substance Misuse Strategy (2020-2025)' sets out how we will reduce drug and alcohol-related harm in Tower Hamlets. This includes a multifaceted approach that prioritises 'early intervention and prevention', 'evidence-based treatment and recovery support', and 'reducing drug and alcohol related crime and anti-social behaviour through enforcement and regulation' which includes Operation Continuum, our multi-agency initiative to crack down on drug dealing.

Address Serious Organised Crime (SOC)

We recognise that SOC is a key issue that drives crime and causes many associated harms for residents and communities in Tower Hamlets. SOC groups are involved in a multitude of criminal activities from drug importation to firearms supply, modern slavery and human trafficking (including County Lines), to housing fraud. In the last year, we became the first borough in London to co-produce a local serious organised crime profile that describes and identify the unique SOC picture in Tower Hamlets. This will enable us to reflect on ongoing trends and emerging threats as a partnership and implement a targeted response. We are committed to:

- Putting data and intelligence at the heart of our approach. This will include the development of a county lines, criminal exploitation profile.
- Work with London's Rescue and Response Service to tackle the problem of county lines and the exploitation of young people.
- Put in place an Information sharing agreement between the Metropolitan Police Central East Borough Command Unit, and the Community Safety Partnership, on organised crime nominals and Organised Criminal Groups
- Support vulnerable communities and build resilience to the social harms caused by organised crime by working with communities, Tower Hamlets Council for Voluntary Services and third sector organisations to co-produce interventions at a local level.
- Relentless disruption and targeted action against the highest harm serious and organised criminals and networks to disrupt the drugs middle market.

Priority 4 – Violence Reduction: Safeguarding Those at Risk of Violence and Exploitation

Key areas of focus:

• Violence Against Women and Girls (VAWG) • Child Exploitation • Safeguarding Children • Street Violence (including Knife and Gun Crime) • Health Impacts • Modern Slavery • Reduce Victimization (Violence)

Why is this a priority

- The exploitation of vulnerable people (including children) is a national issue, encompassing county lines, cuckooing*, modern day slavery and child sexual exploitation.
- Modern Slavery offences saw a 283% increase (+51 offences) compared to the previous year.
- Domestic Abuse (2% increase), Sexual offences (2% increase) and Rape offences (8% increase) all increased compared to the previous year.
- Knife Crime remains a high priority for Tower Hamlets, in line with our regional obligation, despite knife injuries reducing 25% and knife possession reducing by 24%.

Our aims and strategic intentions

- Support victims of 'Violence Against Women and Girls (VAWG)'
 - Increase confidence in reporting VAWG offences
 - Deliver a joined up response to supporting survivors of VAWG
 - Reduce victimisation, repeat victimisation and risk to victims of VAWG and children/families who witness VAWG
 - Tackle hidden, high harm crimes such as Modern Slavery
 - Partnership response to tackling violence crime, including knife crime, serious youth violence, group offending and gang violence, implementing the New Violence Reduction Plan
 - Take a safeguarding approach to both victims and perpetrators of violent crime, considering adverse childhood experiences (ACEs) of those affected and adopting a public health approach to addressing violence
 - Ensure access to statutory mental health support for both victims and perpetrators of violence

Outcomes we want to achieve

- Less victims of violence
- Victims of VAWG feel confident in reporting
- Increase in referrals via the National Referral Mechanism (NRM)
- Achieve a 15% Sanction Detection Rate for rape offences

*cuckooing – The practice of taking over the home of a vulnerable person in order to establish a base for illegal drug dealing, typically as part of a county lines operation.

How Will We Tackle Violence: Safeguard

Violence Against Women and Girls (VAWG)

Our Violence Against Women and Girls Strategy 2019-2024, sets out our local approach to tackling the various forms of VAWG victims may suffer. Our local strategy sets out the following approach:

- Further improve support and protection for victims
- Bring perpetrators to justice
- Engage with communities to raise awareness on VAWG and challenge misogyny

In addition, we will implement enhanced training for police to improve referrals to the DV MARAC and use of orders to safeguard victims.

Violence (including knife crime)

Our approach to tackling violence adopts the principles of a 'Public Health Approach'. This means we will look at violence as a preventable consequence of a wide range of risk factors, such as adverse early-life experiences, or harmful social or community experiences and influences. As part of our approach, we will:

- Implement our partnership Violence Reduction Plan that sets out 6 strategic intentions that address violence.
- Operation Continuum – deliver a high impact response to drug dealing, drug use and associated criminality which is a driver of violence.
- Violence Suppression Unit – Specialist Police units in place to tackle violence.
- Royal London Hospital Project with staff embedded within the emergency department to support young victims of violence.

Safeguarding Children

The Community Safety Partnership have a shared responsibility in protecting our young people and we understand that young people can often become involved in violent offending or related criminality through being exploited.

To address risk of children being exploited, we will:

- Maximise the use of our Exploitation HUB consisting of Police and key Council services to safeguard vulnerable residents at risk of exploitation and being groomed into gangs and group violence.
- Commission 1-2-1 support programmes for those at risk
- Restructure of our Youth Justice Service to strengthen early intervention to divert young people away from risk of entering the Youth Justice system.
- Implement our [Violence Vulnerability and Exploitation \(VVE\) Strategy](#) which sets out 3 strategic priorities to address the issue.
- Develop a new local Predatory Offender Unit (POU) to target perpetrators posing the highest risk, including those who are wanted across all safeguarding strands.
- Use MOPAC Violence Reduction Unit Funding – £1.3m of funding from MOPAC through the London Crime Prevention Fund for crime reduction initiatives, many of which are aimed at reducing violence.

Modern Slavery

The Community Safety Partnership will improve on the use of the National Referral Mechanism to identify and refer potential victims of modern slavery and trafficking, ensuring they receive the appropriate support. Modern slavery is a complex crime and may involve multiple forms of

Those at Risk of Violence and Exploitation?

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Strategic Links

It is important that the Community Safety Partnership plan links in with other strategies across Tower Hamlets. This includes:

- [The Tower Hamlets Plan](#)
- [The Tower Hamlets Strategic Plan](#)
- [The 2017-20 Health and Wellbeing Strategy](#)
- Tower Hamlets Community Cohesion Plan 2020-2025
- [The 2018-23 Homelessness and Rough Sleeping Strategy](#)
- [The 2019-24 Children and Families Plan](#)
- [The Prevent Strategy](#)
- Violence Reduction Plan
- [VVE Strategy](#)
- [Police and Crime Plan 2017-21](#)
- [Safeguarding Adults Board Strategy 2019-24](#)

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Need Information and Advice?

Police

- Phone 999 (in an emergency or when a crime is happening)
- Phone 101 (non-emergency and to report ASB)
- Report ASB and crime online to the police (for drug dealing select antisocial behaviour): www.met.police.uk/report

VAWG – VAWG services

- Tower Hamlets Council website: www.towerhamlets.gov.uk/VAWG
- VAWG [support services directory](#)
- Email: vawg@towerhamlets.gov.uk

Victims of Crime - Victim Support

- Victim Support website: www.victimsupport.org.uk
- Free support line: 0808 168 9291 (8am-8pm, Mon-Sun). Out of hours: 0808 168 9111

Drug and alcohol services

- RESET (adult drug and alcohol treatment service) [website](#)
- Phone: 0203 889 9510 (9am – 5pm, Mon-Fri). Out of hours, leave a message for a member of staff to get back to you
- Email: Resettreatment.th@cgl.cjsm.net or reset.towerhamlets@cgl.org.uk
- Safe East - Compass UK (young people’s health & wellbeing service) [website](#)
- Phone: 0203 954 0091
- Email: compass.towerhamletsyphws@nhs.net

Community Trigger

- Tower Hamlets Council website and reporting online: www.towerhamlets.gov.uk/CommunityTrigger
- Phone: 0207 364 2965 (9am-5pm, Mon-Fri)
- Email: communitytrigger@towerhamlets.gov.uk

Anti-Social Behaviour

- Tower Hamlets Council website and reporting online: www.towerhamlets.gov.uk/ASB


Hate Crime

- Tower Hamlets Council website: www.towerhamlets.gov.uk/HateCrime
- Phone 999 (in an emergency)
- Phone 101 (non-emergency)
- Report online: www.report-it.org.uk

Health and wellbeing

- Tower Hamlets Council [website](#)
(includes useful contacts and links to NHS services, community navigators, physical health, mental health, sexual health, addiction, children, young people and families)

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<p>Cabinet</p> <p>3 March 2021</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Kevin Bartle, Interim Corporate Director Resources</p>	<p>Classification: Unrestricted</p>
<p>Budget Monitoring Report 2020-21 Period 9</p>	

Lead Member	Councillor Ronald, Cabinet Member for Resources and the Voluntary Sector
Originating Officer(s)	Ahsan Khan – Head of Strategic Finance (Chief Accountant)
Wards affected	All wards
Key Decision?	No
Forward Plan Notice Published	N/A
Reason for Key Decision	N/A
Strategic Plan Priority / Outcome	<p>1. People are aspirational, independent and have equal access to opportunities.</p> <p>2. A borough that our residents are proud of and love to live in.</p> <p>3. A dynamic outcomes-based Council using digital innovation and partnership working to respond to the changing needs of our borough.</p>

Executive Summary

This report presents the budget monitoring report 2020-21 as at 31st December 2020 for the General Fund, Dedicated Schools Budget (DSB), Housing Revenue Account (HRA), progress made against savings targets and the Council's capital programme. It also provides projections on General Fund earmarked reserves and indicates a small increase by the end of the year and the forecast impacts of Covid on the Council's finances in 2020-21.

Recommendations:

Cabinet is recommended to:

1. Note the Council's projected outturn position against General Fund, Dedicated Schools Budget, Housing Revenue Account and earmarked reserves for 2020-21, based on forecasts as at 31st December 2020;
2. Note the reserves position of the Council is uncertain pending the

closure of the statement of accounts for the period 2016 – 2020;

3. Note the Council's projected outturn position against General Fund and Housing Revenue Account capital programme approved budgets, based on forecasts as at 31st December 2020;
4. Note that there are no equalities implications directly resulting from this report, as set out in Section 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 19 February 2020 the Council considered and agreed the Revenue Budget and Council Tax for 2020-21. The Council also agreed Dedicated Schools Budget (DSB) and the Housing Revenue Account (HRA) budget for 2020-21, which includes rent setting and other charges.
- 3.2 The net budget requirement for 2020-21 has been set at £354.5m and includes delivering savings of £21.0m (£10.2m for 2020-21, and £10.8m slippage from previous years).
- 3.3 The projection for the General Fund outturn is for an overspend of £2.9m, which already takes into account the use of some earmarked reserves in delivering services (i.e. without the use of these reserves there would be a higher forecast overspend). Furthermore, given the latest forecast financial position, earmarked General Fund reserves are consequently projected to rise; from £132m to £135m by the end of this financial year. Any overspend at the year end will have to be financed from reserves and note the reserves position of the Council is uncertain pending the closure of the statement of accounts for the period 2016 – 2020.
- 3.4 This is clearly not a sustainable position for the Council; taken together with the constraints imposed by the latest Medium Term Financial Strategy and the associated need to reduce net expenditure in line with approved budgets.
- 3.5 The Dedicated Schools Budget (DSB) is forecasting an overspend of £0.1m for 2020-21 and this will increase the forecast deficit from a draft £11.1m to £11.2m.
- 3.6 The Housing Revenue Account (HRA) is forecast to underspend by £1.5m.
- 3.7 The detailed monitoring report, setting out estimated variances against approved budgets and the reasons for the variances, along with the financial implications of the currently reported financial position, is attached as Appendix A to this report.
- 3.8 Detailed progress made against savings targets are contained in Appendix B.
- 3.9 A summary of the non ring-fenced and ring-fenced Covid-19 grants and estimated overall Covid spend and reduced income is detailed within Appendix C.
- 3.10 The projection for outturn on the capital programme is an underspend of £63.5m on the General Fund programme and £18.6m on the Housing Revenue Account programme.
- 3.11 The detailed monitoring report at programme level for both the General Fund and Housing Revenue Account is detailed in Appendix D.

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 monitoring of financial information is also a significant contributor to meeting the Council's Best Value legal duty and therefore this report complies with that legal duty.

Linked Reports, Appendices and Background Documents

Linked Report

- None

Appendices

- Appendix A: Budget Monitoring report 2020-21 Period 9
- Appendix B: 2020-23 Savings Tracker Period 9
- Appendix C: 2020-21 Covid-19 Financial Forecast Summary

- Appendix D: Capital Programme Monitor 2020-21 Period 9

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

- None

Officer contact details for documents: N/A

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Council Budget Monitoring Report as at 31st December 2020-21

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Circulated to	CAB
Date	03 March 2021
Classification	Unrestricted
Report of	Corporate Director of Resources
Lead Member	CLr Ronald, Cabinet Member for Resources and the Voluntary Sector
Originating Officer(s)	Ahsan Khan, Head of Strategic Finance (Chief Accountant)
Wards affected	All Wards
Key Decision?	No

General Fund forecast £2.9m overspend

Dedicated Schools Grant (DSG) £0.1m overspend

Housing Revenue Account (HRA) forecast £1.5m underspend

Forecast position as overspend/(underspend)						
£m	Gross impact on General Fund	Estimated COVID-19 non-ring fenced grants	Variance before reserve adjustments	Contribution to /(from) Reserves	Net impact on General Fund GF/DSG/ HRA	
Children & Culture (GF)	6.6	(5.3)	1.3	0.0	1.3	
Resources	21.6	(9.2)	12.4	(7.8)	4.6	
HA&C	6.9	(2.4)	4.5	(0.8)	3.7	
Place	12.0	(12.2)	(0.2)	(4.3)	(4.5)	
Governance	1.0	(3.8)	(2.8)	(0.1)	(2.9)	
Sub-total GF Services	48.1	(32.9)	15.2	(13.0)	2.2	
Corporate and financing costs	9.5	(5.1)	4.4	(3.7)	0.7	
COVID relief	0.0	(7.5)	(7.5)	7.5	0.0	
General Fund	57.6	(45.5)	12.1	(9.2)	2.9	
Ringfenced Items						
Dedicated Schools Grant			0.1	0.0	0.1	
Public Health GF			0.0	0.0	0.0	
HRA			(1.5)	0.0	(1.5)	
Overall Position			10.7	(9.2)	1.5	

*The estimated COVID-19 non-ring fenced grants include funding for both expenditure incurred and income foregone pressures expected on non-ring fenced Covid grants

General Fund

The General Fund forecast position is a net overspend of **£2.9m**, a £3.2m deterioration on the P8 forecast. There is an underlying overspend of £15.2m in services (before contributions from reserves of £13m) and there are significant savings to be delivered in 2021/22, so strategically these are very challenging circumstances. Any overspend at the year-end will have to be financed from reserves and to note that the reserves position remains uncertain pending the delayed closure and audit of the Council's accounts for the period 2016 – 2020.

Covid-19

The Council's response to the pandemic continues to overlay considerable complexity and uncertainty to forecasting, given that the financial impact ranges from additional expenditure requirements, increases in demand from vulnerable clients, consequential losses of income, unachievable savings and for services having to work differently. The forecasting in this area is also affected both by the unknown length of the emergency and indeed the extent and depth of any consequential recession.

To date the government has provided total non-ringfenced grant of £38.1m (tranches 1-4), of which £0.1m was utilised in 2019/20. In addition, the Government will reimburse a proportion of income foregone, estimated at £7.6m. The total relief for 2020/21 is, therefore, estimated at £45.6m. This exceeds the estimated gross costs by £7.5m in the General Fund (including the DSG COVID-19 pressure of £0.1m).

There are ongoing reviews of service expenditure for the remainder of this, and next, financial year which is likely to result in eligible expenditure that may be chargeable against the Covid relief grant. Thus the £7.5m

will be used to mitigate against the anticipated pressures from the on-going pandemic for the remainder of this financial year and future years. Further details of Covid-19 related costs are detailed in section 10.

Collection Fund

This forecast currently does not allocate any of the non-ring fenced Covid grant to the forecast LBTH share of the estimated Collection Fund deficits for Business Rates (£10.2m) and Council Tax (£4.4m).

Dedicated Schools Budget

After the application of the COVID-19 grant, the forecast overspend is £0.1m. This will increase the brought forward cumulative deficit of £11.1m to **£11.2m** into 2021/22. A mitigation plan is being developed by the Council to address pressures on the Dedicated Schools Budgets and the cumulative deficit.

HRA

The HRA is forecast to underspend by £1.5m.

Forecast overspend £1.3m General Fund

Forecast DSG overspend of £0.1m

£m	Forecast Variance		
	Estimated impact on General Fund (GF)	Variance before reserve adjustments	Contribution to /(from) Reserves
Children and Culture (GF)	1.3	1.3	(0.0)
Children and Culture (DSG)	-	0.1	(0.1)

The general fund is projected to be overspent by a gross £6.6m, an improvement of £0.1m on the position reported at P8. This position is before any relief for COVID-19 has been applied. This forecast includes the impact of Covid-19 is estimated at a £5.3m pressure as at period 9, resulting, therefore, in a net GF position of a **£1.3m overspend** separate from the impact of Covid-19, this is an improvement of £0.3m on the position at P8.

The gross overspend is as follows: Children’s Social Care £0.4m, Education & Partnerships £1.7m, Youth Services & Commissioning £1.6m, Sports, Leisure and Culture £2.5m and Children’s Resources £0.4m. The position after Covid costs are taken out is as follows: Children’s Social Care -£0.1m; Education & Partnerships -£0.3m core revenue but £1.3m school closures and amalgamations; Youth & Commissioning £0.5m; Sports, Leisure and Culture £0.

The heightening Covid-19 position has meant that uncertainty remains in a number of services, where there had been an expectation that income sources would return and pressures on expenditure reduce, however forecasts are now looking at this pressure continuing for the remainder of the financial year. . Work continues to review all the spend and lost income badged as due to Covid-19 in order to ensure that none of this will create ongoing pressures in 21/22.

Budget savings for 2021/22 are still being reviewed as are possible savings for the remainder of this financial year and early opportunities to bring savings forwards. It is anticipated that this work will begin to realise further reduction of the current overspend in the remainder of the financial year.

The positive trend in reducing the overspends in respect of core revenue spending relates to a number of strategies including:

- Recruitment freeze of all non-essential posts
- Earlier closure of locum contracts
- Review of all non-essential spend
- Tight control of demand costs
- Review of all commissioning spend
- Maximising all opportunities for income
- Understanding the relationship of spend in areas such as placements and Section 17 spend with the current Covid Position
- Review of statutory and discretionary services and the potential for further income from Schools

The DSG is projected to be overspent by a gross of £0.25m before any relief of COVID-19 has been applied. There is a Covid-19 pressure of £0.1m within the High Needs Block.

Details of the significant variances on the General Fund are shown below:

	£m	Forecast variance commentary
Children's Resource	£0.4m	
Covid Spend £0.4m		This pressure is as a result of Covid Spend and will be funded from the grant received from government. This pressure is as a result of Covid Spend covering PPE costs and other Covid related costs and will be funded from the grant received from government.
Children's Social Care	£0.4m	
(i) CSC - Staffing £0.3m		The division continues to work to reduce the previous reliance on agency staff. This work has been effective in reducing overall cost but there is still work to do in relation to some Group Manager and Team Manager posts within the Assessment and Intervention teams. There has continued to be good progress with the number of permanent newly qualified Social Workers starting within the Social Work Academy and we have seen agency contracts terminated and started realising savings showing a significant improvement of the previous month's forecast.
(ii) CSC - Looked After Children (LAC) Placements (£0.5m)		LAC placements are forecast to underspend by £0.5m. Despite the pressures of lock-down, CIC numbers remain steady and in line with previous years.
(iii) Leaving Care Placement-change (£0.4m)		This service is currently reporting an underspend position of £0.4k. This is due to a realignment of the young person database and identifying some areas which need strengthening, this work continues to be done to ensure a clear forecast on the final outturn position.
(iv) Section 17 £0.3m		This overspend is related to Covid-19 and is linked to increased demand of no recourse to public funds claims. This appears to be driven by families that previously had income via the "off the books" hospitality/fast-food sector no longer having income due to lockdown. The position here continues to be improved – due to tighter grip on non-essential spend.
(v) Disability Services Direct Payments and Family Support £0.4m		There is a forecast pressure of £0.4m for Direct Payments where there has been an in-year increase in the hourly rate paid for all direct payments. Some of the pressure is offset by an underspend in Short Breaks, the service would benefit from a clear realignment of the budget.
(vi) General Non Staffing expenditure £0.3m		Several areas showed an underspend in 2019/20 due to invoices being received late and not recorded in the correct period. This has meant that costs relating to 2019/20 have been met this year on top of the costs for 2020/21. This pressure has emerged as costs have accrued over the year.

Youth Services and Commissioning **£1.6m**

- (i) **Contract Services £2.0m**

The pressure in contract services remains challenging. Whilst the return to school has meant the number of meals provided has increased, the ongoing closures of year group bubbles has meant short notice reductions in the number of meals taken at the same time as there has been an increase in the number of temporary staff required to cover staff who are self-isolating. Options for the future delivery of Contract Services continue to be reviewed to maximise the service whilst minimising the budget impact, for both the remainder of this Financial Year and for the budget for 2021/22.
- (ii) **Children’s Centres (£0.4m)**

Children’s Centres are forecasting to underspend by £0.4m through tightening on non-essential spend and reduced use of centres during periods of restriction. Further review of current costs whilst the centres are being utilised less could realise future months savings
- (iii) **Professional Development Centre £0.2m**

Whilst there was a structural deficit problem for 2019/20 the position has worsened with the effect of Covid -19 and income not being generated. Future options for the ongoing use of the PDC as a building are currently being explored by the Division and these will be presented, as part of the Contract Services’ restructure, to Children’s DLT in Q4 (2020/21).
- (iv) **Early Help Services (£0.3m)**

This underspend relates primarily to staffing.

Sports, Leisure and Culture **£2.5m**

- (i) **Arts, Parks and Events £1.3m**

Income for filming, Victoria Park Arts and Events are all severely affected by Covid-19. No income for filming has been forecast and the income forecast for Victoria park has been prudent. The AEG income of £1.3m has remained forecast as unrecoverable and is included in Covid-19 related lost income. However, negotiations are underway as an offer has been made by AEG. £0.3m saving is included in the position with the cancellation of the annual fireworks and Mela events.
 - (ii) **Sports and Physical Activity £0.8m**

There is a forecast pressure in Sports and Physical Activity of £0.9m, mainly due to the management fee support provided to the leisure provider GLL and Poplar Baths driven by Covid-19 and agreements to support loss of income by the providers. Discussions are underway with GLL to consider further support after Covid-19 restrictions have once again forced leisure centre closures.
 - (iii) **Community Language Service £0.4m**

The pressure of £0.4m has arisen as savings were attributed to this budget as the service was due to be restructured. This restructure was delayed and staffing costs are now forecast till December when staff will leave the service.
-

Education and Partnerships £1.7m

Loss of Income from School SLAs
£0.8m

A pressure of £0.7m has arisen as a result of the loss of SLA income from Schools. This is made up of Support for Learning Service (£0.2m), Parental Engagement and Support (£0.2m), School Governance (£0.1m), Arts and Music Service (£0.1m), Safeguarding Services (£0.1m) and Schools Library Services (£0.1m)

Closure of Raines School and the amalgamation of Guardian Angels and St Anne's schools
£1.2m

The expected General Fund pressure from the closure of Raines School and the amalgamation of Guardian Angels and St Anne's schools, resulting in forecast pressure of £1.2m, final reconciliation of these school costs will be in month 10 following exploration of opportunities to offset against DSG.

SEN Transport Services
(£0.4m)

Whilst SEN transport continues to be a pressure, during lock down the use of Vehicle hire (taxis) reduced and a £0.4m saving was recognised.

The Dedicated Schools Grant (DSG)

£0.1m

The key impact on the DSG is the significant overspend in the High Needs Funding Block element.

High Needs Block (HNB)
Plus £11.782m deficit from 2018-19 and 2019/20

£0.1m

The position remains improved with high needs currently being forecast as a small in year overspend of £0.2m, £0.1m adjusted for Covid costs. High needs continues to be a volatile budget and whilst the budget is showing a strong in year position the accrued deficit of £11.782m will need to be addressed over a number of years.

Early Years Block (EYB)

The Early Years Block had seen an increase in its funding and is now reporting a breakeven position after the application of funding to remove the deficit from 2019/20. However, an announcement on December 17th indicated a return to participation funding for all providers that could push forward a pressure on this term's budget.

Forecast overspend of £4.6m, after reserves drawdown

£m	Forecast Variance		
	Estimated impact on General Fund (GF)	Variance before reserve adjustments	Contribution to /(from) Reserves
Resources	4.6	12.4	(7.8)

The Resources directorate is forecasting a £4.6m overspend due to housing benefit costs, following assumed Covid-19 funding and expected drawdown of £7.75m from reserves. The reserves drawdown consists of £7.0m from the ICT Transformation Reserve, £0.4m for the Finance Improvement Team from the Transformation Reserve and £0.35m from the insurance reserve.

Details of the areas of overspending and mitigations are summarised below.

£m	Forecast variance commentary
Benefits Service Temporary accommodation costs above grant level	<p>4.6 Housing Benefits forecast overspend of £8.9m, based on current activity level before any other grants have been applied above the housing benefit grant. This forecast overspend is due to temporary accommodation costs and increased demand due to the pandemic and its economic impact on the level of housing benefit claims. The situation will need to be kept under constant review as the economic impact of the pandemic and the government response to local government funding requirements unfolds. Funding sources could include the non-ringfenced Covid-19 emergency grant and specific government grants for homelessness and rough sleeping to support the £4.3m increase since 2019-20.</p> <p>The 2020-21 Benefits service – centralisation of assessments – service review and restructure saving of £0.6m has been delayed due to needing to facilitate grant payments and new business rates reliefs relating to the Covid-19 pandemic and a significant increase in the number of residents submitting new claims for Council Tax Reduction. Replacement funding of £0.6m from the Covid-19 emergency grant is requested to meet this short-term pressure in 2020-21.</p> <p>The extra £40k impact from pay inflation of £2.75% compared to the central MTFS budget assumption of 2% is being offset in 2020-21 through employees paid on spinal points lower than the budgeted top of grade.</p> <p>Improved Recovery of Housing Benefits Overpayments saving (reference SAV/ RES 01 / 18-19) in 2020-21 of £0.5m will not be achieved in 2020-21 due to the economic impact of Covid-19 and this savings slippage is therefore requested to be funded through the Covid-19 emergency grant.</p> <p>As well as the main Housing Benefits Administration Grant, the Benefits Service has also historically received adhoc grants from government departments, such as from the DWP for participation in pilot schemes. Due to the Covid-19 pandemic, these other grants have not been available in 2020-21 resulting in an income pressure of £1.115m which is requested to be funded through the non-ringfenced Covid-19 emergency grant.</p>

Human Resources
Phase 2 review slippage

- 0.4 Savings slippage on phase 2 of the RES001a/17-18 Human Resources saving of £0.7m. This saving is being requested through the 2021-24 MTFS budget setting to be re-profiled to 2023-24. In 2020-21 this saving is being partially mitigated through temporary vacancies and reductions in non-pay expenditure (£0.3m). The forecast includes an impact of £27k from pay inflation above budget and £19k for changes to staff terms and conditions.

The 2020-21 HR Services - Additional Staffing Efficiencies saving of £0.1m has been achieved.

Covid-19 grant funding of £83k is requested for 2020-21 for extra staffing costs relating to co-ordinating key worker information, monitoring and managing the Coronavirus inbox, managing redeployments, collating health and wellbeing information for key workers, and supporting managers with increased staff absences for muscular skeletal, mental health and Covid-19 issues.

Business Support
Phase 2 review slippage

- 0.3 The forecast overspend relates to savings slippage which will be actioned in Phase 2 of the business support review. The forecast includes the impact from pay inflation above budget (£86k) and for changes to staff terms and conditions (£30k).

Customer Access

- Customer Access is forecasting a breakeven position in staffing, outside of a £30k overtime pressure for Covid-19 work, for 2020-21 due to staff being on lower spinal points in grades (budget set at top spinal point) which is mitigating the unachieved 2020-21 Additional Local Presence Efficiencies saving of £0.3m in 2020-21. The forecast incorporates the extra pay inflation cost above budget of £73k and staffing terms and conditions changes of £37k. It is requested that Covid-19 grant funding is provided to fund the £30k overtime costs caused by pandemic work carried out in the Customer Contact Centre and Idea Stores.

Customer Access model savings slippage in 2019-20 of £0.9m has now been achieved for full year effect in 2020-21.

Idea Stores have a budget pressure from lost income relating to room hire, currently the service hope to mitigate this from underspends in other areas.

Idea Stores Learning has lost £218k income from adult community learning classes due to Covid-19 for the period April to November. The Council has submitted claims to MHCLG for reimbursement of £165k, based on the guidance which does not allow claims for the initial 5% of lost budgeted income and reimburses 75% of the remaining lost income. This demonstrates a shortfall in reimbursed income of £53k for April to November, and will be monitored going forward as we return to business as usual to see if there are further income losses in 2020-21. The non-reimbursed income pressure is being offset through expenditure efficiencies.

Finance, Procurement and Audit

- A breakeven position is forecast, following the expected drawdowns of £0.4m from the transformation reserve for the Finance Improvement Team and £0.35m from the insurance reserve for insurance related costs. The Council has committed to continue with its improvement journey following issues highlighted in the ongoing audits of the Council's accounts for 2018-19 and 2019-20. It is anticipated a further £1m will need to be drawn down from the Transformation Reserve in 2021-22 to fund the completion of the improvements. This sum has been taken into account in the forecast Council reserve levels going forward. The breakeven position includes £82k extra staffing cost of pay inflation

above budget and £34k from terms and conditions changes.

The 2020-21 saving for Internal Audit – Streamline Management and Explore Shared Service Options (£50k) is being achieved in 2020-21 through holding vacancies, and will be permanently achieved in the future Finance, Procurement & Audit review of the 2019 restructure.

Information Technology

- Breakeven forecast position, including £33k extra pay inflation cost above budget and £19k from terms and conditions changes which are being offset through vacancies. Infrastructure improvement costs will be funded by a drawdown from the ICT transformation reserve (circa £7.0m).

Regarding the 2020-21 ICT savings of £0.2m, the telephony IVR rationalisation saving of £0.1m has been achieved. The rack rationalisation has been delayed due to supporting the Covid-19 BECC and will achieve part-year savings of £0.04m in 2020-21. Efficiencies in contracted services will meet the short-term £0.06m savings delay pressure in 2020-21.

The pandemic has slowed down the end user computing migration (as low as 40 employees per week in March compared to 300 per week) and this has created extra costs of £0.8m for staffing and prolonged retention of legacy systems (licences, maintenance and support). Funding of £0.8m from the Covid-19 emergency grant is requested to meet this 2020-21 pressure.

Revenues Service

- 0.2 Covid-19 has had a significant impact on the staffing levels required in Revenues Services for administering Council Tax, Housing Benefits and Council Tax reduction claims. The 2020-21 extra cost is estimated at £1m demonstrated by £0.8m direct staffing costs and a £0.2m commissioned contract for external processing support.

The government has announced that it will provide Additional Burdens Funding for administration of the Covid-19 business grants schemes, Local Restriction Grants and the Council Tax Hardship Fund. Allocations have not been announced however it is estimated that this could be circa £0.5m to fund extra staffing time and any required system changes.

It is requested that the additional administration costs not met by Additional Burdens Funding, estimated at £0.5m, are funded by the non-ringfenced Covid-19 emergency grant.

The Council has increased the use of self-service options for the payment of bills by residents. This has successfully aided the achievement of staffing savings, however the increased bank transaction fees for card payments online and by touchtone phone has created a £0.2m pressure against the collection charges budget.

Enforcement activity to recover debts through the courts has been suspended during the Covid-19 pandemic and this has created a £1m under-achievement in court costs awarded income, which is requested to be funded through the non-ringfenced Covid-19 emergency grant.

Programme Management Office and Central Resources

- (0.9) Programme Management Office forecast staffing underspend of £0.45m (including £17k pay inflation cost above budget and £5k cost from changes in terms and conditions) and central resources forecast underspend in third party payments of £0.45m.

Covid costs of £80k are requested to be funded through non-ringfenced Covid emergency grant monies, being £68k for BECC staffing, £7k for London GOLD contribution and £5k for communication mailouts.

The Department for Business, Energy & Industrial Strategy has provided a Christmas Support for Wet-led Pubs Grant of £1k per eligible business. These grant payments to businesses commenced in January and the current estimate is £100k of cost which will be reclaimed from BEIS.

Health, Adults & Community

2.3

Forecast £3.7m overspend on the General Fund

Public Health breaks even

£m	Forecast Variance		
	Estimated impact on General Fund (GF)	Variance before reserve adjustments	Contribution to / (from) Reserves
HA&C	3.7	4.5	(0.8)
Public Health	-	0.0	0.0

The Adults, Health and Community Directorate forecast outturn for 2020-21 at period 9 is for a £3.758m overspend after accounting for a drawdown of £0.76m from reserves to fund the Partnership Taskforce. This is an increase in the forecast compared to Month 8 of £0.1m. Additional staffing costs relating to the Tower Rewards implementation were included in the forecast from Month 4. The forecast position is net of Covid19 related expenditure of £2.417m which is assumed to be fully funded through corporately held government grants. A full review of Covid-19 expenditure being incurred and recharged to the CCG has been undertaken, in line with the NHS Discharge Guidance and the projected income from the CCG for 2020/21 is estimated to be £4.343m. The main challenge remains around the demand for and cost of services within Adult Social Care. The main variances are summarised below.

The 2020/21 budgets include £2.55m of savings, including £0.78m of savings from 2019/20. The directorate is forecasting to achieve £2.165m (84%) of these savings in 2020/21, though these savings contain a range of risks to delivery.

A recovery plan is in place to address the budget pressure and is regularly reviewed – this includes stringent reviews of the cost of all new placements and existing placements, recruitment/agency controls and no non-essential expenditure. There is ongoing work to track progress against the recovery plan (robustness of data remains a concern in this regard) and also to identify further savings opportunities if possible. Progress in delivering the recovery plan has yet to make a material impact on the forecast outturn. Agency staff has already been reduced and is under further review – some critical front-line roles in adult social care still require cover by agency staff at this time however all posts are now out to permanent recruitment following a restructure.

There are a number of risks across the directorate through demand and price pressures. The ongoing impact of the Covid-19 pandemic continues to affect demand for services and have a financial impact on service providers' operating costs and their risks of financial viability. We are seeing an increase in complexity of cases when people are being assessed, resulting in more costly packages, more 1-1 support, in part due to the impacts of the extended and ongoing disruptions to regular routines and not seeing loved ones in care settings. We are also unaware of the true impact of those who may not have sought support or not visited hospital as usual, and expect as these people present that demand subsequently rises, with an impact due to care being delayed on the continued reluctance to engage with the health and social care system. The ongoing impact on social care due to long-Covid is still to be assessed, as is the associated mental health impacts of continued lock-downs.

Details of the main areas of overspending and mitigations are summarised below:

(in numerical descending order)

Forecast variance commentary

Adult Social Care & Integrated Commissioning

Forecast overspend variance £4.119m (£0.087m increase on Period 8)

The forecast outturn variance is a £4.119m overspend against a net budget of £101.40m (4.0% overspend) a small increase of £0.087m compared to P8.

The forecast overspend is caused by ongoing demand pressures across all service areas and underlying price pressures on placements/care packages. The council supports approximately 3400 people across all types of care. These overspends are a continuation of the pressures seen and reported in previous years. Similar pressures in adult social care budgets are reported by authorities nationally. An independent review of budgets, expenditure, savings and future projections has been commissioned.

The main pressures in the forecast at P9 continue to be reported on ASC Care Packages. However, these are offset by savings elsewhere, primarily on Employee Costs in the Directorate.

ASC Care Packages (£4.938m forecast overspend, £0.542m deterioration over P8)

This reflects a continuation of the underlying financial position as reported in the 2019/20 outturn. Demand for services and unit cost for the services exceeds the available budget. The cost of all new placements is strictly controlled and all existing high cost packages are being reviewed. As we review all care packages using strengths based approaches, some service users, carers, providers and stakeholders are raising concerns about changes to support arrangements – this is inevitable as we try to draw more on universal and community support and increased short-term services with a reablement focus.

Care support plan assurance meetings (CSPAM) are held on a weekly basis to review new placements and challenge the costs of existing placements that are subject to regular review. CSPAM Tier 1 consider all packages where the cost of care packages exceeds £500. Since the 1st of April CSPAM tier 1 has considered 347 cases, 102 of the cases resulted in an approved increase, 91 resulted in a decrease and 134 remained the same, with a further 20 were new placements. Excluding new placements the financial impact was a net weekly increase of £10,341. CSPAM tier 2 considers cases below £500. In the period from 1st of April to date some 306 cases have been considered, 99 resulted in an agreed increase, 133 were reduced, 52 remained the same and 22 were new placements. The financial impact of CSPAM tier 1 and 2 is summarised in the tables presented below:

CSPAM Tier I Summary	No. of clients	Change in weekly cost	Full year impact
Increase	102	44,911	2,341,664
Decrease	91	(34,570)	(1,802,483)
No Change	134	0	0
TOTAL	327	10,341	539,180
NEW clients	20	17,248	899,317

CSPAM Tier II Summary	No. of clients	Change in weekly cost	Full year impact
Increase	99	9034	471,031
Decrease	133	(24,475)	(1,276,105)
No Change	52	0	0
TOTAL	284	(15,441)	(805,074)
New	22	1,965	102,477

The outcome of weekly CSPAM meetings is fed back to social care and commissioning staff, where social care practise may need to be refined and improved and where there is a lack of capacity in certain sectors that integrated commissioning needs to address.

The key areas of overspend for placements budgets are as follows:

Learning Disability services is currently forecasting an overspend of £2.420m, a £0.142m deterioration over period 8. The level of overspend exceeds the savings that the service needs to achieve through the Supporting Independence programme. There are significant pressures on the service from transition of young people from Children's Services. With an assumption that these part year costs will be c£1.2m in the current financial year. In addition, lockdown has presented significant challenges for many families/family carers of people with learning disabilities. High cost packages are being reviewed as part of the recovery plan and in the medium to long-term we continue to focus on developing more local options for independent living with support. The cost of packages of care and placements is also an area of focus. A further iteration of the recovery plan, specific to learning disabilities is being articulated. Overall placement numbers have not materially changed over the course of the financial year to date.

The costs of supporting young adults with a Learning Disability can be extremely expensive where the current average cost of a residential placement is in excess of £1,779 per week and a Supported Living placement approaching £1,150 per week.

Mental health services are currently forecast to overspend by £1.390m a slight improvement of £0.025m over period 8. This includes support for those of working age and support for those over the age of 65 including those with dementia. A further iteration of the recovery plan, specific to mental health has been articulated. Over the course of the year to date there has been a small reduction of placements for those aged 65+ (227 down to 222) but an increase for younger adults from 312 to 350. Any continuation of the trend in placements for younger adults could lead to further budget pressures.

There is an a £1.706m overspend in Physical Disability services, a deterioration of £0.170m from period 8, mainly in direct payment client costs. All packages are being reviewed under the **Care and Support Planning Assurance Meetings** (CSPAM) by looking at alternative provision that meets needs whilst bringing down overall cost of the service. In terms of placements, the number of older adults shows a net change of 17 fewer placement since April but the number of younger adults has increased by 28 in the same period.

Other (£0.701m forecast underspend, an improvement of £0.464m from P8)

An improvement forecast position on staffing budgets where a corporate contribution to the costs of the national pay award has led to an increase in the budgets and the moving of miscoded expenditure. A continuing underspend in the recharge for transport costs is being realised as day opportunities remain closed.

Income (£1.177m forecast shortfall, £0.041 deterioration from last month)

Income from joint health funded placements is forecast to be lower than budgeted. This is a concern which requires further investigation with partners. There are risks associated with changes in guidance on hospital discharges during the latter part of 2020 – this could reduce the level of NHS funding available post admissions and may increase cost pressures in Adult Social Care. In addition, the assessment process for Continuing Health Care (CHC) has recommenced (although may again be suspended) – it is essential that those entitled to assessments for CHC are supported through this process in order to access free NHS care where they are eligible for this due to the level of their needs.

Integrated Commissioning (£1.295m forecast underspend, £0.009m deterioration compared to P8)

The majority of this underspend relates to a recent restructure saving of £202k, delays in recruitment, staff vacancies and allocation of BCF funding held in Integrated Commissioning, where expenditure is incurred in Adult Social Care.

Community Safety

Forecast underspend of £0.361m (£0.02m deterioration on Period 8)

The forecast outturn variance is a £0.361m underspend against a net budget of £5.734m, a small deterioration of £0.027m compared to P8.

A recovery plan is in place to address an overspend which was identified at the start of the year (relating to the costs of operating the CCTV service) which has brought the financial position back on target and this month has seen a further improvement as a result of a forecast reduction in the operational costs for CCTV.

There is also an improvement in the forecast position for Drug and Alcohol Action Team where latest information suggest that the costs of prescribing could be lower than previously forecast. Risks remain with this forecast as the demand for this service does fluctuate.,

The agreed recovery plan contained a list of proposals totalling £560k as set out below

Savings Area	Value £'000
Reduce CCTV Operator hours	161
Negotiate Charter Management Fee	16
Reduce camera maintenance	100
Hold ASB post vacant	53
Hold Partnership Task Force vacancies / stop funding	200
Income Generation	30
Total	560

Progress has been made against each of the savings areas with the amounts RAG rated green totalling £530k, but there is a low likelihood that the remaining £30k will be delivered. The reduction in camera maintenance is having an impact on the number of cameras in use with a greater number now inoperable. The project is underway to acquire replacement digital cameras which are due to come on stream from 2022. The additional costs of Tower Rewards and Pay Award have been factored into the forecast.

Public Health Breakeven position forecast	- It is currently forecast that the Public Health grant will be fully utilised in 2020/21.
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Projected £4.5m underspend on the General Fund after reserves drawdown

£m	Forecast Variance		
	Estimated impact on General Fund (GF)	Variance before reserve adjustments	Contribution to /(from) Reserves
Place	(4.5)	(0.2)	(4.3)

The Place Directorate is forecasting to underspend by £4.5m after adjustments for reserve movements and COVID-19 funding. Significant underspends have been forecast within Housing & Regeneration and Public Realm, with smaller underspends in Planning & Building Control and Growth & Economic Development. Property & Major Projects is overspending, primarily as a result of rent loss at Jack Dash House. This represents an adverse movement of £1.1m when compared to the previous reported forecast, primarily as a result of one-off costs that are going to be incurred clearing fly tipped waste on public highways at Ailsa Wharf.

The Directorate is budgeting to drawdown £4.3m from reserves to support specific activities, the use of which has been projected in the forecast above.

- Waste Mobilisation (Transformation reserve) £0.5m
- Mayors Tackling Poverty Reserve £2.1m
- Flexible Homeless Support Grant Reserve £1.1m
- PRS Grant Reserve £0.1m
- Building Control Trading Account Reserve £0.1m
- MPG (Incentivising Recycling on Estates) £0.4m

The Place Directorate has been significantly impacted by COVID-19, with income being reduced primarily in Public Realm and Planning and additional costs within Housing and Growth & Economic Development. An assumption has been made that all directly attributable costs and income will be fully recoverable through Government funding with the exception of rent holidays for community groups, as these were local decisions and therefore cannot be reclaimed.

The gross forecast for the Place Directorate is a £16.6m overspend before any Government funding is applied for COVID-19 and budgeted reserve drawdowns. Direct costs and income loss attributable to COVID-19 across the Place Directorate total £16.8m and assuming this will be funded in full from Government grant results in an underspend of £0.2m before any budgeted reserve drawdowns. After budgeted reserve drawdowns of £4.3m the Place Directorate is forecasting to underspend by £4.5m from its business as usual activities.

The Directorate has £3.1m of savings targets in 2020/21. Although there is an additional risk of non-delivery as a result of COVID-19, it is currently felt that they will be delivered with the exception of £0.1m for a saving relating to the in-sourcing of THH which will be written off corporately. The impact of the savings proposals is included within the forecast for each division.

Property & Major Programmes

Reduction in income from occupation of Jack Dash House; Security costs on void properties; Recovery of costs relating to Architects; Increased lease costs for Mulberry House; Increased business rate costs on buildings; rent holiday for commercial properties

1.3

Property & Major Programmes (£1.3m Overspend)

The Property & Major Projects division is forecasting a gross overspend of £1.9m. This includes a total of £0.6m of COVID related cost and lost income, being offset by the general Covid grant or through the income recompense scheme. This results in an overspend of £1.3m from business as usual activity. There are a number of factors contributing to the business as usual overspend that are detailed below.

Facilities Management (£0.1m Underspend)

An underspend against postal costs of £0.1m where new ways of working are reducing the volumes of postage and a reduced contract cost

The new Town Hall revenue budget is forecasting an underspend of £0.1m. The majority of costs being incurred at present are being capitalised, resulting in the underspend. Nearer to completion further revenue costs will be incurred so there is an ongoing need for this budget.

There is a £0.1m pressure relating to security costs for a void property (Bromley Hall School) that has transferred to Property and Major Projects from Children's services without any budget adjustment as the property was previously funded from the education basic needs grant.

COVID related costs totalling £0.4m are projected to be incurred to make buildings COVID secure, additional cleaning, signage, hand sanitiser and PPE purchases. It is assumed that this amount will be offset against the government grant received and will not impact on the divisions outturn position.

Loss of £0.1m income within the events team from hire of buildings as a result of COVID and the buildings being closed during lockdown. This will be recovered through the fee and charge claim to MHCLG and has a nil impact on the outturn position.

Capital Delivery Team (£0.2m Overspend)

The Architects team budget to recharge their costs on a cost-plus basis. However, the income target assigned to the team is unlikely to be achieved as a result of the capital programme to date being in abeyance with little scheme development and the majority of work completed relating to the internal capital programme where time is recharged at cost. Work is ongoing to mitigate this pressure from within Capital Delivery.

Asset Management (£1.2m Overspend)

A reconciliation of the Agresso finance system and the TF Cloud asset management system has identified rental income of £0.4m relating to general fund properties that have been leased to third parties. Historically this income has been coded incorrectly to the HRA rather than the CLM rents. There is no general fund budget for these rents.

A pressure of £1m resulting from loss of rent following Tower Hamlets Homes move from Jack Dash House in July 2018. This is an ongoing budgetary pressure that will only be part mitigated once the building is occupied. At present several organisations are renting floor space within the building but rental income is low as the leases come with a rental holiday of up to a year. There is also further interest in leasing the vacant floors and negotiations are ongoing.

The Asset Maximisation Board is working to mitigate this pressure and to deliver future savings targets. Although occupancy will increase over the months ahead, organisations will only enter into lease agreements if a one year rental holiday is given, which will mean any mitigation will be delayed.

Even if the building is fully occupied there will be an income shortfall of £0.3m

A budget pressure of £0.3m on business rates where there has been an increase in the multiplier over several years. These increases are not included in the MTFS.

A pressure of £0.8m relating to rents and service charges paid by the Council. The lease for Mulberry Place has increased from £2.8m to £4m per annum as of July 2020. No growth bid was included as part of the 2020/21 budget setting process, creating a pressure. This pressure has been partly mitigated through other savings, reducing the impact to £0.3m. An MTFS growth bid will mitigate this pressure in future years.

There is a forecast loss of rent of £0.1m following the decision to give community groups a three-month rent holiday as part of the Council's response to COVID-19. This is a local decision and therefore cannot be recovered through the income loss claim to MHCLG. It is therefore assumed that this cost will be met from the COVID emergency grant funding as approved by an Individual Mayoral Decision on 17th April 2020 and will have no impact on the outturn position.

Resources

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Resources (Nil Variance)

There are no material variances forecast within this area.

Planning & Building Control

(0.4)

Planning & Building Control (£0.4m Underspend)

Reduced fee income in relation to Planning and local land charges; vacant posts; Planning appeals relating to Bell Foundry and West Ferry Printworks;

Planning & Building Control is forecasting a gross overspend of £0.4m against budget. This includes a loss of income of £0.7m directly attributable to reduced activity as a result of COVID-19 and £0.1m of reserve funding to offset the forecast overspend within the traded building control account. After making these adjustments there is a forecast underspend of £0.4m from business as usual activity.

Salaries (£0.6m underspend)

There are salary underspends across the Division projected at £0.6m. There are vacancies within Building Control (general fund and trading), Development Management, Application Support, Local Land Charges and Infrastructure Planning.

Development Management is largely funded by planning fee income, and the under recovery of income set out below is being managed through the vacancies in this area.

Income (Nil Variance)

There is a savings target of £0.1m relating to new fees for Planning Performance Agreements. There has been significant interest for this service to provide a more personalised journey through the planning process and large developers have signed up for the service. It is forecast that the full two-year saving of £0.2m will be delivered in the current financial year, resulting in additional income of £0.1m.

Planning Performance Agreement income is projecting a further underspend against budget of £0.2m on top of the saving detailed above. Demand for this service is above budgeted levels.

Based on current projections, planning fee income is forecasting to under recover by £0.5m against budget. Planning income reduced by £0.4m as a result of delays in developers bringing forward sites for planning consent due to COVID-19, however we are seeing some big sites that had stalled

during the summer coming back in again for pre-app. It is assumed this shortfall will be reclaimed as part of the COVID income, resulting in a forecast overspend of £0.1m.

The mood within the industry is less confident post COVID-19 with some developers nervous to develop as a result of financial pressures. This will be monitored throughout the year to identify the impact on income streams.

Income relating to land searches reduced by 60% from April to June as a result of the impact of COVID-19, with the number of house sales significantly falling, resulting in an income shortfall of £0.2m. Relaxing of stamp duty post COVID has encouraged more house sales and land searches have returned to pre-COVID levels. It is assumed that this income shortfall will be recovered through the Council's COVID income grant claim, resulting in no variance against budget.

Building Control General Fund income is projecting a shortfall of £0.2m against budget. The shortfall results from competition for work from the private sector.

Other Costs (£0.2m Overspend)

LBTH can offset directly attributable costs against Mayoral CIL (MCIL) up to 4% and Tower Hamlets CIL (THCIL) up to 5%. Projections indicate that the Council will receive more CIL income in year than initially expected and as a result the amount of expenditure charged against it will increase, resulting in a forecast underspend of £0.2m against budget.

The Secretary of State has called in planning decisions at the Bell Foundry on Whitechapel estate and the Chest Hospital. It is estimated that the appeals will result in costs of £0.2m for which there is no budgetary provision.

The Council has received notification that the enquiry on Westferry Printworks is going ahead and as a result the Council will incur further costs. The original appeal cost £0.5m. It is assumed costs will be lower this time and it is prudent to include £0.2m as a projected cost at this stage. Progress will be monitored over the months ahead and the forecast adjusted accordingly.

Building Control Trading Account (nil variance)

The Building Control Trading Account is projecting to outturn with a £0.1m overspend against budget. There is a £0.3m forecast pressure on income as a result of reduced service following COVID-19 and competition from the private sector which is being offset by vacancies (£0.1m) within the service. £0.1m of the income loss is specifically COVID related and will be reclaimed through the income loss recompense.

The Building Control trading account has a net nil impact on the general fund. The overspend will be mitigated by a £0.1m drawdown from the earmarked reserve at year end. There are sufficient funds held within the reserve to meet this budget shortfall.

Growth & Economic Development
Vacant posts within Economic Development; reduced use of apprenticeship scheme

(0.7)

Growth & Economic Development (£0.7m Underspend)

The Growth & Economic Development division is forecasting a gross overspend of £2.3m. This includes a pressure of £3.2m directly attributable to the COVID-19 pandemic through additional work undertaken by the tackling poverty team. These costs will be met primarily from specific grants received for this Covid related activity. The forecast underspend of £0.7m from business as usual activity includes a budgeted drawdown of £2.1m from the

Mayors Tackling Poverty reserve and the budgeted use of £1.2m of s106 funding.

A specific Covid grant of £0.3m has been received and is being spent in full in year on reopening the high streets safely.

Economic Development (£0.3m Underspend)

Economic Development are projecting to underspend against budget by £0.3m. This underspend relates to vacant posts within Enterprise Support and Performance and Value teams. This underspend position assumes approved s106 funding and mayoral growth monies will be utilised as planned in the base budget.

Any unspent funding relating to project work such as Apprenticeships, Women into Health, Women into Childcare and Tackling Poverty programmes will be returned to the balance sheet for future use and previous years underspends drawn down from the balance sheet to mitigate any approved additional spend.

Tackling Poverty (Nil Variance)

There is a total of £3.1m in the Mayor's Tackling Poverty Reserve, of which £2.1m is forecast to be spent in year. The remaining balance of £1m will primarily fund the team costs, specific project work and money for credit union in 2021/22.

Additional costs have been agreed in year that relate to spend on projects that have been approved by the Poverty & Inequalities board for children's social care and purchasing small items for families, an additional loan scheme forming part of the residents support package. The board has also approved the recruitment to three new posts. These costs have all been factored into the projections detailed above.

The Tackling Poverty team has undertaken significant additional work from COVID-19 with rules around the resident support scheme being relaxed and through the opening of a food bank and food deliveries to vulnerable and shielding residents. Food vouchers have also been distributed to vulnerable residents and a track and trace system implemented. In total Covid related costs are estimated at £3m in 2020/21.

This amount will be funded from various grants including £1.2m winter COVID grant, £1m test and trace grant and £0.5m from the emergency assistance grant fund from DEFRA. It is assumed that £0.3m will be funded from the general COVID grant. No impact on the outturn position has been forecast.

The Tackling Poverty team are providing an extended holiday hunger programme following the Marcus Rashford campaign and have received funding of £0.455m which is being used to provide food vouchers to vulnerable children and residents over the Christmas holiday period. Further funding of £2.3m will be received in the new year to further extend the scheme in 2021/22.

Careers Service (Nil Variance)

The Careers service is forecasting to outturn in line with budget. Costs are predominantly salary related and any vacancies are offsetting agency costs being incurred. The budget has recently transferred to Growth & Economic Development and is short by £0.2m, the result of a restructure savings proposal that has not delivered the required level of saving. It has been

agreed that any of this pressure that cannot be mitigated will be funded corporately.

PAS Scheme (£0.4m Underspend)

An underspend of £0.4m relating to the apprenticeship scheme is being forecast. This scheme places local residents in apprenticeship placements outside of the Council and the Council make a contribution to the cost. There has been no spend in this area and it represents a priority for review in 2020/21.

Public Realm
Impact of COVID-19 on both income and expenditure being offset by vacancies and savings against the waste disposal contract

(1.0) Public Realm (£1m Underspend)

The Public Realm division is forecasting gross costs of £10.2m over budget. This includes £8.8m of cost and lost income and cost directly attributable to COVID-19 that will be recoverable from Government funding. There are also budgeted reserve drawdowns totalling £0.9m and balance sheet transfers totalling £1.5 for rechargeable works and licensing, resulting in a forecast underspend of £1m from its business as usual activities.

Parking Control (£0.8m Underspend)

The Parking service is projecting a gross overspend of £1.7m against budget before any adjustments. Lost income totalling £2.5m has been forecast as a direct result of COVID-19. It is anticipated that this pressure will be met from Government funding and the parking service will outturn £0.8m under budget from its business as usual activity.

Enforcement

The Enforcement service was suspended for April and May with commencement of a reduced service in early June. As a result, there is a gross £0.8m loss of income to the end of May where 15k fewer tickets were issued when compared with the previous year. Since June the enforcement service has been in operation and PCN income has been increasing. This income loss is being reclaimed through the income recompense scheme and will have no impact on the outturn position.

During the year the Council has opened the Wapping Bus Gate which is generating 3,500 additional tickets per month. This combined with income from the mobile cameras is resulting in £0.8m over achievement of the budgeted income target.

Suspensions

Bay suspension income is forecasting to over recover by £0.6m despite COVID-19 with demand for the service continuing to be high. In previous years a number of large multiple year suspensions has resulted in significantly more income being collected. This is not being projected for the current year, making the level of additional income modest when compared with previous years.

Casual Parking

Gross Casual Parking income is projected to be £1.5m lower than budget. During lockdown casual parking income is being impacted with fewer visitors to the Borough. This income loss will be claimed back against the income recompense scheme and will not impact on the outturn position.

Overall, it is forecast that income will be in line with budget from business as usual activities.

This position includes an increased income budgeted target of £1.5m with the

service contributing to a Corporate savings target for the maximisation of income. This additional budget target is being achieved from unbudgeted income that is being realised from the diesel surcharge levy.

Permits

There is an under recovery of £0.5m against permit income. This relates to a reduction in the income received from visitor vouchers which are now sold individually rather than in books, a reduced demand post lockdown for business and public service permits and relaxing enforcement during lockdown resulting in fewer resident permit renewals.

Removals

A reduced removals service has resulted in a net loss of £0.2m to the Council and being COVID related it is assumed will be met from Government funding.

Concessionary Fares (£0.1m Underspend)

The mobility support service is forecasting to underspend by £0.1m, with the contribution towards the cost of Taxi Cards being less than budgeted. This is a demand led budget, with little ability for the Council to control or reduce costs.

The Council incurs spend of £9.8m per annum on the freedom pass scheme, being charged for bus journeys for card holders that terminate in the Borough. Usage of freedom passes has reduced over the first quarter of 2019/20 by 80%, which would result in a saving of £1.8m. However, this saving will not be realised in year as the freedom pass charge is calculated on past year usage and the benefit will therefore be in future years.

Street Trading Account (£0.4m Overspend)

The Markets service is forecasting to overspend by £1.8m of which £1.4m is directly attributable to COVID-19. All markets were closed from April until the middle of June, with a phased re-opening of some markets from 15th June. The majority of the markets have closed again during November as a result of the second lockdown. This overspend position includes any small savings resulting from the markets closure, such as reduced cleaning. To date a decision has been made not to furlough market officers and therefore the salary costs are included in this forecast.

Markets continued to struggle after the phased re-opening. £50k of invoices have been cancelled where traders have ceased to continue, permanent traders have not returned to pre-COVID levels, there are fewer casual traders and the tightening of Government restrictions around groups of people meeting is impacting on the footfall through the markets. This has resulted in a forecast £0.2m budget pressure from business as usual activity.

From July the service has experienced increased levels of income from footway licensing with more traders looking at outdoor seating rather than indoors, but this is being offset by casual market trader income not being collected as these traders have not been allowed to return to the markets. The impact on income will be monitored in the months ahead.

It is forecast that the markets service will be able to recover £1.4m of income from Government funding as it is directly attributable to COVID-19.

There is a risk of further cost being incurred as the PSI Fusion handheld project has been cancelled and engagement with a new supplier is ongoing. Capital expenditure totalling £0.4m in total has been incurred on the PSI Fusion project, some of which is likely to be abortive and written back to

revenue. This amount will need to be shared across various service areas that were part of this project including markets, parks and community safety. Further work is being undertaken to identify any capital expenditure that requires writing back to revenue.

Being a traded service there should be no impact on the General Fund arising from surpluses and losses within the markets service. However, the reserve balance was utilised in full last year and there is now no reserve against which to offset losses. As a result, £0.4m will need to be absorbed by the General Fund. This includes an in-year pressure of £0.2m and a balance of £0.2m currently held as a debit against the reserve from the previous year overspend.

Environmental & Regulatory Services (£0.3m Underspend)

The Environment & Regulatory Service (ERS) is forecasting a gross overspend position of £1.3m. This includes £1.5m of pan-London mortuary costs (LBTH share of the cost) and £0.1m of additional burial costs, both of which are directly attributable to COVID-19 and projected to be funded in full from Government grant, resulting in an underspend of £0.3m from business as usual activity.

The projected net outturn position is an underspend of £0.3m from business as usual activity. This forecast includes budgeted transfers from the balance sheet of £1.2m for various licensing services.

The forecast underspend results from vacancies held within the out of hours noise service, pest control, traveller's liaison, licensing administration and food safety services. These vacancies are projected to save £0.3m in year. These posts have been very difficult to fill and staff retention is a problem within this area.

Additional income from Landlord Licensing, HMO (House in Multiple Occupation) and Late-Night Levy licenses are being profiled to be allocated over the life of each licence issued. Income is received up front and drawn down over the license period for which it is valid to cover costs incurred. A budgeted drawdown of £1.2m is forecast which will result in no projected variance.

The one-off costs totalling £1.5m relating to London wide mortuary costs outlined above has been incurred in year. This reflects the additional mortality management service costs across London during the pandemic. These costs are being met by the 33 Boroughs based on ONS population projections and this cost represents LBTH's share. Further cost of £0.1m has been incurred for additional staffing and consumables within the mortuary service as a result of the increased number of deaths caused by COVID-19. These costs are projected to be met in full from Government grant funding and will have no impact on the forecast position.

A further £0.3m is being spent on Covid marshalls who are patrolling the borough to ensure compliance with Covid lockdown rules. This cost is being met from specific MHCLG grant and therefore has no impact on the business as usual forecast.

Public Realm Management & Administration (Nil Variance)

The outsourced waste collection and Trade Waste services have been brought back in-house in 2020/21. One-off funding was approved through growth bids to fund the cost of implementation, resulting in a £0.3m budget in 2020/21. Current forecasts indicate that this budget will be spent in full and additional costs totalling £0.5m will be incurred for planned work around

staff inductions, I.T. and service consumables slipping into this financial year. It is assumed that this will be funded from reserves in year.

Operational Services (£0.1m Overspend)

Waste Collection service has been insourced in 2020/21 and internal budgets created for the provision of the in-house service. At present a £0.6m overspend is being forecast which can be directly attributed to additional costs incurred as part of COVID-19. The use of agency staff to cover high levels of sickness and staff that are self-isolating combined with reduced numbers of men on lorries and additional PPE requirements has resulted in this pressure which is forecast to be met from Government funding.

A £0.5m underspend is being forecast for waste disposal and recycling. This is mostly related to underspends against the disposal contract and income from rebates for recyclable materials

Unbudgeted costs of £0.4m are forecast to be incurred for incentivising recycling on estates. This cost will be met from approved Mayoral Priority Growth reserve funding and therefore has a nil impact on the revenue outturn position.

Commercial Waste income is forecast to be short of budget by £2.2m. As a result of COVID-19 many of the commercial waste customers were on lockdown and either suspended or cancelled accounts. Some of these customers may not return to the Council after lockdown or will cease trading and combined with ceasing debt collection is compounding the pressure. An aggressive marketing campaign will be undertaken in an attempt to increase the portfolio and mitigate this pressure in future years. It is assumed that LBTH will be able to reclaim this lost income through the COVID income grant recompense scheme, resulting in a net nil impact on the Directorate outturn.

The Contracts Development Team is forecasting to underspend by £0.3m. Growth for graffiti removal is unlikely to be spent, with the cost of works being absorbed within existing budgetary provision.

There is an emerging pressure of £0.8m relating to fly tipping at Ailsa Wharf. The Ailsa Wharf site is currently in the process of being sold to Country Gardens, with completion due in the current financial year. LBTH has statutory responsibility to clear the highway, which Country Gardens will require to access their site once purchased. The clearing of the site will be outsourced and £0.8m is deemed to be a worse case cost.

Riverside walk has overspent by £0.1m. There is a historical income target relating to the Travelodge site. The site was sold and a capital receipt realised. However, the site was generating an income and this lost income is resulting in a pressure.

Highways and Traffic Management (£0.3m Underspend)

A £0.4m overspend is being forecast against street works where additional agency support is being incurred along with unbudgeted costs associated with running the street manager platform, a requirement of the Department for Transport, and a reduction in income from Traffic Management Orders (TMOs). The reduction in income is a direct result of COVID-19 and amounts to £0.2m. This is forecast to be recovered from COVID-19 funding, resulting in a £0.2m overspend from business as usual activity.

An underspend of £0.2m from reduced maintenance of street lights and from the use of LED light bulbs.

Forecast spend on rechargeable works is in line with budget which will allow the Council to draw down £0.3m of fees (27.5% of cost). This is in line with the budgeted drawdown. It is LBTH policy for any amounts held in reserve for longer than six years to be utilised within the general fund if not claimed back. There is the potential for a further £0.3m to be used in this way in 2020/21 and it is assumed that the General Fund will take advantage of this in year.

Fleet (Nil Variance)

The Fleet service is forecasting to outturn in line with budget. During lockdown there has been a reduced service where schools have been closed and the passenger transport vehicles not in use. These savings will be passed on to Adults and Children's through reduced recharges.

Housing & Regeneration

Additional income from buyback programme above that budgeted; Over recovery of income relating to lettings service

(3.7) **Housing & Regeneration (£3.8m Underspend)**

The Housing & Regeneration division is forecasting to underspend by £3.7m from its business as usual activities. This forecast includes a budgeted £1.1m drawdown against the Flexible Homelessness Support Grant reserve and £0.1m from PRS Access Grant reserve. The forecast also includes budgeted use of £5.9m of grant received in year.

There are £3.4m of additional costs relating to rough sleeping that are directly attributable to COVID-19. It is assumed that these costs will be met from a combination of general COVID grant (£2.58m) and ringfenced money received through the Government's Next Steps Accommodation programme (£0.820m). Details of the variances are outlined below.

Homelessness (Underspend £3.5m)

The Homelessness and Temporary Accommodation services are forecasting to outturn with an underspend of £3.5m. However, this excludes the Housing Benefit subsidy loss of £4.6m which is reported within the Resources section of this report. The overall cost of Homelessness is a £1.1m overspend against budget.

Homelessness numbers continue to increase, placing more pressure on the use of expensive nightly booked and bed & breakfast accommodation at additional cost. However, additional rental income relating to 400 property acquisitions as part of the buyback programme is mitigating this cost pressure by generating additional rental income over that budgeted and reducing the reliance expensive nightly booked and bed & breakfast accommodation. The Housing Options service are working through the backlog of assessment cases and moving more people on to housing benefit, resulting in further increases in income. Until assessment is complete the Council is meeting the cost of housing these families but not receiving the rental income through housing benefit.

This forecast is inclusive of the continued utilisation of grant received for homelessness and rough sleeping in year and from reserve drawdowns. In total budgeted grants totalling £5.9m are planned to be received in year and spent, covering specific activity including rough sleeping initiatives (£0.6m), homelessness reduction act (£1.2m), flexible homelessness support (£3.9m) and cold weather fund (£0.2m). Reserve drawdowns totalling £1.2m are budgeted on top of these amounts, £1.1m from the FHSG reserve to cover the cost of the annual rent increase which is not passed on to tenants due to the negative impact it has on the HB subsidy loss and additional contributions to the bad debt provision that are forecast in year. A further £0.1m drawdown is being forecast from the PRS Access grant reserve which is funding two posts.

Housing Options Lettings (Underspend £0.2m)

The Housing Options Lettings service is forecasting to underspend by £0.2m as a result of vacant posts and income from Registered Social Landlords (RSL's) exceeding budgeted targets. RSL's are using the Council's common housing register above budgeted levels and a charge is being made to them for this service.

COVID-19 Response

As part of its COVID-19 response, the Government asked local authorities to put in place a plan of support for all rough sleepers, accommodating them in hotels and other forms of emergency accommodation during the response to the pandemic. This has resulted in over 200 individuals rough sleeping on the streets or at imminent risk of rough sleeping being found suitable emergency accommodation in the past two months. The Council incurred additional cost of £1.8m from the initial response to the end of July. Ongoing costs for accommodation and support packages totalling £1.6m are forecast for the remainder of the year as part of the next steps programme. Specific grant funding of £1.4m has been received for this work, with the remaining £2m costs projected to be met from the general COVID grant allocation. In total, costs directly attributable to COVID-19 are forecast at £3.4m for the year.

£m	Estimated impact on General Fund (GF)	Variance before reserve adjustments	Contribution to /(from) Reserves
Governance	(2.9)	(2.8)	(0.1)

The Governance directorate forecast outturn impact on the general fund is an underspend of £2.9m. This position is following assumed Covid-19 funding and after requested drawdown from the transformation reserve of £0.040m (for Communications support of transformation initiatives) and the EU exit preparations grant reserve of £0.105m.

The 2020-21 budgets include £0.6m of Strategy, Policy and Performance centralisation savings slippage to be achieved through the enabling functions review across the Council.

Details of the areas of overspending and mitigations are summarised below.

(in numerical descending order)	£m	Forecast variance commentary
Communications	0.1	Communications is forecasting a potential overspend of £66k, being an estimated £50k from changes in staffing terms and conditions including contractual changes for out of hours working (cost impact to be evaluated as level of additional hours becomes evident) and £16k impact from pay inflation of £2.75% compared to the central MTFs budget assumption of 2%. This forecast position is after the requested drawdown of transformation reserves for extra staffing to support Council-wide transformation initiatives of £40k.
Information Governance	0.1	An overspend of £63k due to staffing costs (£33k) and i-casework software costs (£30k). The staffing costs overspend includes one-off agency costs of £11k (which ended as the team became fully staffed with permanent employees) and £8k cost pressure from pay inflation above budget. The Council's corporate information governance software (i-casework) is currently unfunded however it is planned for this system to become part of the Council's customer relationship management (CRM) system in the future.
Strategy, Policy & Performance (SPP)	(2.8)	<p>The £2.8m underspend forecast position for SPP is demonstrated through a forecast underspend of £2.9m in third party payments, partially offset by a £0.1m forecast overspend in staffing. This forecast position is after the requested drawdown of the EU exit grant reserve created in 2019-20 to support EU exit preparations.</p> <p>The staffing forecast overspend is due to pay spine increases from changes in staffing terms and conditions of £59k and pay inflation above budget of £44k.</p> <p>There are £3.6m of costs which are requested to be funded from the Covid-19 emergency grant for volunteering and data analysis/reporting to support Covid-19 planning and monitoring. In addition to offset the delay from Covid-19 on the enabling functions review of SPP functions across the Council.</p> <p>The Council successfully bid to receive a grant of £260k as part of the ESOL for Integration Fund (EFIF) from MHCLG. Three providers have been commissioned and the project will seek to boost language skills, build confidence, reduce isolation and ensure everyone can participate in their local community.</p>

Democratic Services and Mayor's Office - A breakeven forecast position, with the £24k pressure from pay inflation above budget and £2k pressure from new terms and conditions being offset through an underspend in non-pay expenditure.

Legal Services - Forecast breakeven position for 2020-21. Temporary staffing vacancies are offsetting the staffing pressures from pay inflation above budget (£31k) and pay spine increases from changes in terms and conditions (£12k).

Registrars Services - Forecast underspend of £23k in staffing and non-pay expenditure.

There has been an increase in the registration of deaths due to Covid-19, however this has been managed within existing staffing budgets by prioritising this over other services. There has been a reduction in income due to not delivering all services, including wedding ceremony fees, birth and notice of marriage and other certificates including immigration services.

For the period April to November, the Registrars Service has lost £159k in net income after mitigating some of the effect by reducing contracted staff overtime and casual staffing costs. The Council has submitted claims to MHCLG for reimbursement of £106k, based on the guidance which does not allow claims for the initial 5% of lost budgeted income and reimburses 75% of the remaining lost income. This demonstrates a shortfall in reimbursed income of £53k for April to November. Many ceremonies and events have been deferred rather than cancelled, however further potential losses will be monitored for the rest of the financial year.

Corporate Management (0.1) Net forecast underspend of £54k in the areas of the Chief Executive's Office, Corporate Director of Governance and Monitoring Officer duties, Investors In People (IIP) assessment and staff conferences/events.

Covid-19 related costs of £46k are requested to be funded by the non-ringfenced Covid-19 grant for communications, additional cleaning and security at Registrars buildings.

Electoral Services (0.2) Electoral services is currently projecting a forecast underspend of £150k due to staffing vacancies and no elections or referendums planned in 2020-21.

National elections (GE, European, GLA) are funded, in part, through a maximum recoverable amount grant and this is a system that provides a 75% advance and 25% to be claimed back, with surpluses being assessed by government with no guarantee.

The 2020-21 position includes a £122k assumption of income accrued for previous year elections, of which £92k has been recently agreed by the Elections Claims Unit as settlement for the 2019 European Parliamentary elections but will be received in April. The remainder of the accrued income should be achieved through two Parliamentary Constituency Claims yet to be settled.

Forecast overspend of £0.7m after drawdowns from reserves

£m	Forecast Variance		
	Estimated impact on General Fund (GF)	Variance before reserve adjustments	Contribution to /(from) Reserves
Corporate and financing costs	0.7	4.4	(3.7)

The corporate and financing costs area is forecasting an overspend of £0.7m, following assumed Covid-19 funding and after the planned drawdown from reserves for £3.730m contribution to non-recurrent expenditure in the MTFS position.

The planned drawdown from reserves consists of the £2m short-term funding of Free School Meals from the Free School Meals Reserve and £1.730m short-term funding of the Programme Management Office from the Transformation Reserve.

Details of the variances are summarised below:

(in numerical descending order)	£m	Forecast variance commentary
Cross-Directorate Savings Slippage in savings achievement	3.7	<p>Slippage in cross-directorate savings held centrally of £4.45m, being £1.6m Debt Management & Income Optimisation, £1.35m Review of Printing/Scanning/Use of Multi-Functional Devices (MFD's), £1.15m Local Presence savings, £0.25m Income Through Housing Companies and £0.1m THH - Potential support service savings.</p> <p>The Covid-19 pandemic has delayed achievement of the £1.6m Debt Management & Income Optimisation saving and therefore replacement funding for 2020-21 is requested from the Covid-19 emergency grant.</p> <p>Unachievable saving held centrally of £0.8m Appropriation of Housing Revenue Account (HRA) Shops to General Fund (GF) which is being requested to be written off through the 2021-24 MTFS budget setting process.</p> <p>The TOWER Rewards terms and conditions saving of £2m has been offset against the £2m central budget originally held to fund spinal point increases which directorates will now manage within their overall budgets.</p>
Social Care Grant and Winter Pressures Grant	4.0	Removal of double counted income between Core Funding and the HA&C and C&C directorates.
Central Support Costs Unallocated support costs	3.2	Forecast of overhead costs that are funded centrally (not apportioned out to directorates).
Redundancy, Severance and Early Retirement Forecast overspends to be funded by capital or reserves	-	There is a forecast overspend of £3.2m although this is based purely on the 2019-20 level of expenditure, which consisted of £1.9m in severance costs (nil budget), £0.8m in early retirement pension strain and £0.5m in redundancy costs. The corporate budget only funds redundancy costs where these relate to achieving savings agreed in the medium term financial strategy (MTFS). The forecast net nil position assumes these costs will either be capitalised or funded through reserves.

Central costs	-	It is requested that the Covid-19 non-ringfenced grant is utilised to fund the Council's contribution to the London Resilience Fund of £30k.
Pension Fund deficit repayment Forecast underspend against budget	(1.0)	Forecast underspend against the budget allowed (£12.8m) for the payment to the Pension Fund to meet deficit estimated by the actuary.
Corporate contingency Budget to cover unforeseen circumstances	(3.1)	There are currently no commitments against the contingency budget of £3.1m.
Treasury Management Forecast underspend on borrowing costs budget	(6.1)	<p>A forecast underspend on the borrowing costs budget, due to slippage in the capital programme. An estimated £3.6m of the Minimum Revenue Provision (MRP) internal borrowing cost will be funded by the rental income earned through the property buyback programme in Place directorate.</p> <p>It is forecast that interest and dividend income in 2020-21 will be £1.9m. This is significantly lower than the 2019-20 achievement of £5.4m, due to the Covid-19 impact on the economy and the Bank of England subsequently reducing its base rate to 0.1%. It is assumed that the £3.5m reduction in income can be claimed through Covid-19 grant funding from central government.</p>

£m	Estimated impact on HRA	Forecast Variance	
		Variance before reserve adjustments	Contribution to /(from) Reserves
HRA	(1.5)	(1.5)	0.0

The HRA is forecasting to underspend before reserve movements by £1.5m. This projection includes the impact of COVID-19 on both income collection and expenditure budgets. Projections will be input into the HRA business plan during the year to identify any pressures or opportunities arising at the earliest stage to enable strategic decision making within the ringfenced HRA.

(in numerical descending order)	Variance £m	Outturn variance commentary
Tenants Rent & Service Charges	(0.3)	A new service charge has been implemented charging tenants for the MOPAC work, where police patrol the estates to combat anti-social behaviour. The underspend represents the part year effect of this charge
Leasehold Income	(1.1)	There has been a significant increase of repairs undertaken on leasehold properties which has resulted in an increase in the charge and therefore income forecast for leaseholders.
Leasehold Admin Fee	0.1	The Leasehold admin fee is projected to be short of budgeted levels as a result of the reduced number of right to buy sales
Bad Debt Provision	1.6	It is felt that it is prudent to increase the provision for bad debt for both leasehold and tenant rent debt as a direct impact of COVID-19. Where outstanding debt is not being chased and potential hardship caused from COVID, the amount of debt requiring write off is likely to increase. This will be closely monitored but a 1% increase in the tenant rent provision and 5% for leasehold debt has been applied.
Repairs & Maintenance	(1.7)	An underspend on repairs & maintenance is forecast as a result of less responsive repairs on internal decorations, internal repairs and play areas, reduced works on passenger lifts and repairs to communal areas. Access to properties has been limited due to Covid. There has been no asbestos work due to COVID restrictions. These underspends are being partially offset by additional work on risk assessments on water storage
Communal Energy	(0.3)	The communal energy contract was re-procured at the end of last year, resulting in savings against budget.
Concierge		

	0.1	The Concierge budget is forecasting to overspend as a result of increased fire safety patrols that are currently in place
Community Investment Budget		
	(0.5)	This budget is used to support organisations within the Borough. The impact of COVID has resulted in reduced service provision and a saving against the budget.
Business Rates charges – Community Centres		
	0.1	Charges for business rates on community centres held within the HRA is £0.1m higher than budgeted. This results from annual inflation that has not been applied to the budget.
Major Works		
	0.5	A 10% administrative charge is applied to major works bills passed on to leaseholders. Activity has been significantly reduced as a result of the abeyance of the capital programme which has resulted in a reduced admin fee.

General Fund Balances and Earmarked Reserves

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The table shows how the General Fund balances are under pressure and how this might be managed by means of utilising earmarked reserves. Note the reserves position of the Council is uncertain pending the formal closure of statement of accounts for the period 2016 – 2020.

	Draft balances at 31 March 2020 as per 2019/20 Accounts	Assumed Contribution to / (from) Reserve	<i>Potential adjustment to maintain GF balances</i>	Projected Balance 31 March 2021
£m	£m	£m		£m
GF balances (general reserve)	20.4	(2.9)	4.2	21.7
Budgeted drawdown in MTFS	0.0	(1.7)	0.0	(1.7)
	20.4	(4.6)	4.2	20.0
Earmarked reserves consist of:				
Earmarked reserves with restrictions				
Insurance	8.7	(0.4)	0.0	8.3
New Civic Centre*	17.0	(17.0)	0.0	0.0
Parking Control	3.3	0.0	0.0	3.3
Collection Fund Smoothing**	6.5	28.4	0.0	34.9
Free School Meals Reserve	2.0	4.0	0.0	6.0
Public Health Reserve	1.0	0.0	0.0	1.0
Revenue Grants Unused	8.5	(1.3)	0.0	7.2
COVID 19 grant	10.3	(2.8)	0.0	7.5
CIL	7.8	0.0	0.0	7.8
Earmarked reserves with restrictions – Subtotal	65.1	10.9	0.0	76.0
Earmarked reserves without restrictions				
Risk Reserve*	4.5	(0.9)	0.0	3.6
Transformation Reserve	5.3	(2.6)	0.0	2.7
ICT Reserve	14.5	(7.0)	0.0	7.5
Mayor's Tackling Poverty Reserve	3.4	(2.1)	0.0	1.3
Mayor's Priority Investment Reserve	5.4	(1.2)	0.0	4.2
New Homes Bonus	30.6	10.0	(4.2)	36.4
Services Reserve	3.2	(0.2)	0.0	3.0
Earmarked reserves without restrictions - Subtotal	66.9	(4.0)	(4.2)	58.7
Total Earmarked Reserves	132.0	6.9	(4.2)	134.7
Total GF and Earmarked reserves	152.4	2.3	0.0	154.7

*The Civic Centre will now be funded by borrowing, and the balance of this reserve will be used to fund the Business Rates Collection Fund Deficit together with £0.9m from the Risk Reserve.

** The Collection Fund Smoothing Reserve is restricted in its use as it is solely intended to deal with surpluses and deficits that arise on an annual basis in the collection fund. The reserve figure above excludes the Local Council Tax Support Grant (£4.0m) and the Lower Tier Services Grant (£1.4m) which are expected to be received and utilised in 2021-22.

HRA and DSG Reserves

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The table shows the projected position for the Housing Revenue Account, and for Dedicated Schools Grant.

HRA and DSG reserves	Draft balances at 31 March 2020 as per 2019/20 Accounts £m	Movement £m	Projected Balance 31 March 2021 £m
Housing Revenue Account (HRA)	43.8	1.5	45.3
HRA Earmarked Reserve	9.0	0.0	9.0
Dedicated Schools Grant (DSG)	(11.1)	(0.1)	(11.2)
Total Other Reserves	41.7	1.4	43.1

<p>Overall Position</p> <p>We have £234m of investments and £72m borrowing.</p>	<p>For this period our portfolio totals £234m, and we are currently receiving an average income return of 1.01% and total return (including capital gains/losses) of 0.60% due to the short-term impact of Covid-19 on the capital value of pooled funds.</p>
<p>Income Position</p> <p>Forecast investment income of £1.9m is below the budget of £2.3m.</p>	<p>The 2020-21 revised budget for investment income is £2.3m. Based on current interest rates and portfolio size we are forecasting to achieve £1.9m income. This is below the budget and significantly lower than the 2019-20 achievement of £5.4m, mainly due to the Covid-19 impact on the economy and the subsequent reduction in base rate to 0.1% by the Bank of England.</p>
<p>Benchmarking</p> <p>We compare favourably for the return we get from our investments.</p>	<p>According to the Quarter 3 benchmarking information received from our advisors, Arlingclose Ltd, our average income return of 1.01% is out-performing a group of sixteen London councils (0.54% average income return) and a group of 130 national local authorities (0.77% average income return).</p> <p>We are continuing to look at alternatives that retain and protect the capital value of our investments while maximising income return.</p>
<p>Liquidity</p>	<p>28% of funds are available within 7 days. 41% of funds are available within 100 days.</p>
<p>Inflation</p> <p>Monies invested are holding value against current inflation.</p>	<p>As at November 2020, the Consumer Prices Index (CPI) inflation was 0.3%, down from 0.7% in October. The Council's average income return of 1.01% is therefore higher. This means that the future value of the funds invested today will be more.</p> <p>The income return is positively impacted by dividends received from investments in externally managed pooled funds. The capital values of these funds were negatively affected by the economic impact of Covid-19. These have however improved in value since the beginning of the financial year (£75.2m at the end of December) and are currently 1.05% lower than purchase price (£76m).</p>
<p>Borrowing</p> <p>Forecast interest payable cost on external borrowing is £2.25m.</p>	<p>The Council has Public Works Loan Board (PWLB) loans totalling £54.8m and fixed rate bank loans totalling £17.5m.</p> <p>There is a forecast underspend on the borrowing costs budget due to slippage in the capital programme.</p>

This section shows the amount of money we have collected from tax payers of the borough, and the split between the amount that is retained and the amounts paid over to central government and the GLA.

Due to the effect of the Covid-19 pandemic on the Collection Fund deficits for 2020-21, the government announced that 2020-21 deficits can be repaid over the three year period 2021-24. This is a further spread of the impact over more years than the normal requirements for repayment periods. The Spending Review 2020 and subsequent provisional LGFS stated that the government will cover 75% of 2020-21 Collection Fund deficits for Business Rates and Council Tax.

To date, the government has provided £4.4m funding through the Council Tax Hardship Fund of which £1.8m has been used for £150 hardship payments to Council Tax support claimants, and the remaining balance could support the increase in costs of the overall Local Council Tax Reduction Scheme.

NNDR (Business Rates)

We are expected to collect £356m in total for 2020-21.

Collection levels have been impacted by the Covid-19 pandemic.

There is an accumulated Business Rates Collection Fund deficit to the end of 2019-20, of which the Council share is circa £22.5m, and the Council will repay this in 2020-21.

The Council share of the 2020-21 Business Rates deficit is currently forecast to be £10.2m, which will be repaid over the three year period 2021-24 and the government will fund 75% of the deficit.

The Covid-19 pandemic has significantly impacted the 2020-21 business rates income through revaluations, other changes to the rating list and a reduction in collection rates. The level of the deficit will continue to be affected by changes in the pandemic and its economic impacts and is therefore being monitored closely.

For the total Business Rates income (retained by the Council and passed to the GLA and central government), the original estimate for Business Rates net rates payable for 2020-21 was £472m. This has reduced to £356m after the introduction of the Extended Retail Relief Scheme and Section 31 grant was provided to offset this reduction and the effect of rateable value changes in the valuation list. The shortfall in Business Rates collected to date is circa £38m (Council share is £11.4m) due to non-payment at this point in time, however these debts are expected in the main to be collected in the future as enforcement procedures are reinstated.

To the end of November, we have collected £264.5m (71.8% in-year collection rate) compared to 74.5% for the same period in 2019-20. This includes collection of the Business Rate Supplement (BRS) for the London Crossrail development.

Council Tax

We are expected to collect £142m in total for 2020-21.

Collection levels have been impacted by the Covid-19 pandemic.

Council Tax income is split between the Council (77%) and the

There is an accumulated Council Tax Collection Fund deficit to the end of 2019-20, of which the Council share is £7.9m, and the Council will repay this in 2021-22 (£6.5m will be funded through the Council's smoothing reserve).

The Council share of the 2020-21 Council Tax deficit is currently forecast to be £4.4m, which will be repaid over the three year period 2021-24 and the government will fund 75% of the deficit.

GLA (23%).

The Covid-19 pandemic has reduced growth in the number of new properties (the Tax Base), reduced the collection rate and it has increased significantly those claiming benefits including through the Local Council Tax Reduction Scheme (LCTRS). The cost of the LCTRS scheme has risen from £26.7m in 2019-20 to circa £31.8m in 2020-21.

For total Council Tax income (both retained by the Council and passported to the GLA) the collectable budget for 2020-21 is £142m.

To the end of November we have collected £86.2m of the £139.9m Council Tax bills raised (61.6% in-year collection rate) compared to 65.12% for the same period in 2019.

Target for year £21.0m

£11.7m savings to be delivered

£m	20-21 Target	Prior Year Slippage	Saving Target	Forecast Savings	Slippage	Under Recovery	Over recovery
	A	B	C = A + B				
HA&C	1.3	0.9	2.2	1.3	-	0.9	-
Children and Culture	1.5	1.0	2.5	2.0	0.6	-	-
Place	2.8	0.3	3.1	2.9	0.1	0.1	-
Governance	-	-	-	-	-	-	-
Resources	2.2	1.7	3.9	1.5	2.4	-	-
All	2.4	6.9	9.3	4.0	2.0	3.2	-
Total	10.2	10.8	21.0	11.7	5.1	4.2	-

Total savings target for 2020-21 is £21.0m (£10.2m relates to approved savings as part of the 2020-21 budget setting process, and £10.8m as a result of previous years' savings not delivered, which have been re-evaluated since the last report).

- £11.7m is identified as being on track to deliver savings;
- A net position of £5.1m is forecast to slip into future years due to timing issues;
- £4.2m has been identified as unachievable

Total impact of Covid £38.0m

Income forecast to reimbursed (as per MHCLG return) £7.6m

£m	Total Covid expenditure claimed against non-ringfenced grant	Reduced income not relating to sales fees and charges and claimed against non-ring fenced grant	Sales fees and charges income expected to be reimbursed	Sales fees and charges income not being reimbursed claimed from non ring-fenced grant	Total
Children and Culture	2.2	0.0	2.2	0.9	5.3
Resources	6.9	2.1	0.2	0.0	9.2
HA&C	2.4	0.0	0.0	0.0	2.4
Place	7.0	0.0	5.1	0.1	12.2
Governance	3.7	0.0	0.1	0.0	3.8
Corporate and financing costs	1.6	3.5	0.0	0.0	5.1
Total	23.8	5.6	7.6	1.0	38.0

As a consequence of Covid, the total additional expenditure impact (excluding ring-fenced grants spend) on General Fund services in 2020-21 is forecast at £38.0m. The council is forecasting foregone income of £7.6m as a consequence of Covid will be reimbursed by Central Government.

The total impacts of pressures from Covid in 2020-21 on non-ring fenced Covid grants have decreased by £5.2m from the previously reported P8 position. This is due to decreases within Place, amounting to £3.2m, largely due to previously forecast Covid pressures on non-ring fenced grants now anticipated to be funded from ring fenced specific grants and decreases within HA&C, amounting to £2.7m, largely due to previously forecast pressures on non-ring fenced Covid grants are now anticipated to be funded from projected income from the CCG. These decreases in pressures on non-ring fenced Covid grants have been off-set by forecast pressures from interest income for Treasury Management which has reduced by a further £0.4m to £1.9m within Corporate and Financing costs from P8 due to medium term deposits ending which had a higher interest rate prior to the pandemic period and within Children's and Culture, where there is an additional forecast loss on Catering income of £0.2m from last month.

Please refer to Appendix C – 2020-21 Covid-19 Financial Forecast Summary for an analysis of the non ring-fenced and ring-fenced Covid-19 grants and estimated overall Covid related spend and reduced income. It should be noted that Appendix C also highlights Covid grants that relate to financial year 2021/22 and beyond.

General Fund P9 Capital Monitoring

Theme	Directorate	November Budget 2020-21 (£m)	P9 Forecast 2020-21 (£m)	Actual P9 (£m)	Variance Nov Budget Vs P9 Forecast (£m)
Approved Programme	Children's	7.698	7.439	2.105	(0.259)
	Health, Adults and Community	12.240	4.252	1.144	(7.988)
	Place	88.482	55.342	26.224	(33.140)
	Resources	3.867	9.132	5.511	5.265
Total		112.286	76.165	34.984	(36.121)
Annual Rolling Programme	Children's	3.991	3.155	1.990	(0.836)
	Health, Adults and Community	0.300	0.000	0.000	(0.300)
	Place	12.276	8.224	1.796	(4.053)
Total		16.567	11.378	3.787	(5.189)
Invest to Save	Place	36.455	18.222	11.470	(18.233)
	Resources	3.530	0.000	0.000	(3.530)
Total		39.984	18.222	11.470	(21.763)
Completed	All Directorates	0.478	0.077	0.059	(0.401)
Total		0.478	0.077	0.059	(0.401)
General Fund TOTAL		169.315	105.841	50.301	(63.474)

The total approved General Fund capital programme for 2020/21 was approved at November 2020 Cabinet totalling £169.315m. The current estimated General Fund capital expenditure for the year is forecast at £105.841m, which represents 63% of the approved budget. The spend to date is £50.301m, representing 30% of the total approved budget.

Services are projecting £63.474m underspend against the budget and this will slip into future years, much of which has been re-profiled through the January Capital Programme 2021/22 to 2023/24 report. Based on the spend to date and with the prevailing pandemic, services are finding it difficult to forecast accurately and to deliver as programmed, due to the stop/start nature of working conditions during the year. While the current forecast does appear to be ambitious, this will be closely monitored through to outturn.

The major variances are described below:

Approved Programme:

Children's

Budget £7.698m

Forecast: £7.439m

Variance: (£0.259m) underspend

The major programme under Children's services is the Basic Need and Expansion programme, within this programme there are several large schemes currently under way and in the early stages. The forecast for Period 9 shows that the programme spend is in line with the budget. However, it is noted that the previous forecast reported in January showed a larger forecast spend for Children Services. The reasons for this change in forecast relates to St Paul's Way, which is now showing a reduction of £0.600m, this funding is no longer needed for the school and will be released back to the Basic Need programme. Works that were forecast to take place this year to a lab at George Green have been pushed back to the of summer 2021 (£0.277m).

Other delays relate to some certification of materials that are currently under review for Bow SEN (Phoenix Upper) , and this has pushed the scheme into 2021/22 (£0.900m), when it had been thought that the bulk of the works would have been completed this financial year - this change however brings Bow (Phoenix Upper) back to it's original budget forecast.

Health, Adults and Communities

Budget £12.240m

Forecast: £4.252m

Variance: (£7.988m) underspend

The key forecast underspends are due to Adult Social Care and Goodman's Fields. The Adult Social Care forecast underspend of £3.000m relates to community safety schemes which were formally approved late in this financial year, therefore the spend has been reprofiled to slip into future years. Goodman's fields project is projected to underspend by c£2.500m. This project is being delivered by the NHS, therefore the spend and forecast shown here are dependent on the NHS's capacity to deliver given the priority and focus on tackling Covid-19 pandemic. Aberfeldy Practice, also being delivered by the NHS, is also showing an underspend of approximately £1.000m. The rest of the underspend within HAC is made up of several smaller scale schemes.

Place

Budget £88.482m

Forecast: £55.342m

Variance: (£33.140m) underspend

The key projects that make up the forecast underspend variance of £33.140m are The New Town Hall and London Square forecast underspend of £15.782m and this is due the resequencing of programme works due to uncertainty in supply chain; COVID-19 has prolonged procurement of works packages, hence higher forecast in 2021/22. Works on London Square have been delayed and are due to start in 2021/22.

The Registered Provider Grant Scheme is showing an underspend of £6.108m. This project is delivered by external registered providers. Where specific allocations were made to Registered Providers, amounting to £2.2m of the budget, sites have experienced delays as a result of the effects of Covid-19, and one site has experienced delays due to a high profile accident on site. There has been delays in allocating the remaining unallocated

budget due to due diligence needed to be carried out in relation to a new Registered Provider partner ahead of the grant allocation process (£3.9m).

The original budget profile for South Dock Bridge was estimated based on the initial feasibility study. The programme timetable has now been amended as a result of extensive consultation with stakeholders and Members, a change of approach to the bridge design to ensure the project demonstrates value for money and delays in procurement and pre-application public consultation due to the pandemic. The completion of the detailed design has enabled firmer project cost projections and a revised profile to be established. The projected completion date is Spring 2023.

Resources

Budget £3.867m

Forecast: £9.132m

Variance: £5.265m overspend

The overspend for IT - Smarter Working of £5.265m is due to the increased spend on various IT projects and these will be funded by the IT transformational Reserve and capital receipts, as previously approved by Cabinet.

In the January 2021 cabinet report, the cabinet approved the additional budget for ICT Transformation and Smarter Working.

The movement from the previous forecast and P9 forecast relates to the slowdown in the roll-out of the IT transformation scheme, and this will continue to September 2021. This includes the CRM project (£0.400m), the Fraud investigation system and the Power BI schemes (£0.100m) will slip into 2021/22.

Annual Rolling Programme:

Place

Budget £12.276m

Forecast: £8.224m

Variance: (£4.053m) underspend

The Disabled Facilities Grant is forecasting an underspend this year of £1.035m, this is due to a reduction in referrals being made to the team, and the inability to gain access to vulnerable people's homes, due to the effects of Covid-19.

Local Infrastructure Initiatives had a budget of £3m this year but is now projecting an underspend of £2.613m. The LIF programme has got off to a slow start this year and has been under development. A new team is in place within the council and it is forecast to increase spend next year.

The remaining underspend within the Annual Rolling Programme is made up of several smaller scale schemes in Health, Adults and Community and Children's.

Resources

Budget £3.530m

Forecast: £0.000m

Variance: (£3.530m) underspend

The reported variance is due to a planned review underway on 3 of the Council's housing companies.

Housing Revenue Account (HRA) forecast £18.632m underspend

HRA P9 Capital Monitoring

Theme	Directorate	November Budget 2020-21 (£m)	P9 Forecast 2020-21 (£m)	Actual P9 (£m)	Variance Nov Budget Vs P9 Forecast (£m)
Annual Rolling Programme	HRA	24.512	17.814	9.129	(6.698)
Approved Programme	HRA	52.889	40.955	13.298	(11.934)
Total		77.401	58.769	22.427	(18.632)

The approved HRA budget for 2020/21 is £77.401m. The forecast for the year is £58.769m, which represents 76% of the budget. The spend to date is £22.427m which is 29% of the budget. The HRA capital programme is forecast to underspend by £18.632m in 2020/21.

The major variances are described below:

**Tower Hamlets Homes (THH) -
Annual Rolling Programme**

Budget £24.512m
Forecast: £17.814m
Variance: (£6.698m) underspend

Of the £24.512m budget, THH are projecting spend of £17.814m, an underspend of £6.698m is anticipated at year end. This is principally due to an underspend in the Mechanical and Electrical programmes for council dwellings, which have been hampered by COVID-19.

**Approved Programme – First
1,000 Homes**

Budget £52.889m
Forecast: £40.955m
Variance:(£11.934m) underspend

Works commenced to deliver 150 new council homes in March 2020, and to deliver a further 17 new homes in December 2020. Progress on some sites is ahead of schedule, but on others, there have been issues which have caused delays to physical starts on site, many of which have been beyond the council's control such as challenges associated with utility providers and agreement of wayleaves and easements with third parties. This has resulted in underspend and at P9 it is no longer possible for the 2020/21 delivery targets programmed by the contractors to be met.

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MTFS Savings Tracker 2020-23

Period 9 Summary

2020-21						
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

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

2022-23					
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	1,322	780	2,102	496	1,288	-	814
Children & Culture	1,544	1,000	2,544	-	1,959	585	-
Place	2,801	300	3,101	-	2,901	100	100
Governance	-	-	-	-	-	-	-
Resources	2,200	1,700	3,900	883	1,500	2,400	-
Cross-Directorate	2,375	6,881	9,256	4,025	4,025	2,014	3,217

	2,491	-	2,491	1,745	-	746
	2,468	585	3,053	2,304	-	749
	1,464	100	1,564	1,564	-	-
	140	-	140	140	-	-
	850	2,400	3,250	2,550	700	-
	5,745	2,014	7,759	7,335	424	-

	550	-	550	550	-	-
	1,327	-	1,327	1,327	-	-
	525	-	525	525	-	-
	200	-	200	200	-	-
	200	700	900	900	-	-
	4,370	424	4,794	4,794	-	-

Total	10,242	10,661	20,903	5,404	11,673	5,099	4,131
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Total	13,158	5,099	18,257	15,638	1,124	1,495
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Total	7,172	1,124	8,296	8,296	-	-
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Savings Achievement Status

Delivered / On Target	7,692	3,000	10,692	5,054	10,032	-	660
Slipping but Achievable	2,200	3,930	6,130	350	1,526	4,350	254
Undeliverable / Unachievable	350	3,731	4,081	-	115	749	3,217

	12,302	-	12,302	11,302	-	1,000
	606	4,350	4,956	3,654	1,050	252
	250	749	999	682	74	243

	6,962	-	6,962	6,962	-	-
	210	1,050	1,260	1,260	-	-
	-	74	74	74	-	-

Total	10,242	10,661	20,903	5,404	11,673	5,099	4,131
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Total	13,158	5,099	18,257	15,638	1,124	1,495
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Total	7,172	1,124	8,296	8,296	-	-
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MTFS Savings Tracker 2020-23 - Period 9

Reference	Year Approved	Title	Directorate	Service Area	Savings Achievement Status
CHI002/17-18	2017-18	Better support for families through early help, and reduction in social care demand	Children & Culture	Childrens Social Care	Delivered / On Target
SAV/ CHI 01 / 18-19	2018-19	Events In Parks - Income Generation	Children & Culture	Sport Leisure and Culture	Slipping but Achievable
SAV / CHI 002/ 19-20	2019-20	Adoption Allowances	Children & Culture	Children's Social Care	Delivered / On Target
SAV / CHI 005 / 19-20	2019-20	Parent and Family Support Services (Traded Model)	Children & Culture	Learning & Achievement (Parental Engagement & Support)	Delivered / On Target
SAV / CHI 006 / 19-20	2019-20	Community Language Service	Children & Culture	Sport, Leisure and Culture	Undeliverable / Unachievable
SAV / CHI 001 / 20-21	2020-21	Rationalisation and development of early help services from conception to age 25 in youth and commissioning	Children & Culture	Early Help Service, Integrated Early Years' Service, Youth Service part of the Youth and Commissioning Division	Delivered / On Target
SAV / CHI 002 / 20-21	2020-21	Savings and traded delivery of education and partnership services	Children & Culture	Education & Partnerships	Slipping but Achievable
SAV / CHI 003 / 20-21	2020-21	Transformation of service delivery provided by the integrated early years service	Children & Culture	Integrated Early Years' Service (IEYS), Youth and Commissioning Division	Delivered / On Target
SAV / CHI 004 / 20-21	2020-21	Transformation of service delivery following the youth service review	Children & Culture	Youth Service (part of the Youth and Commissioning Division)	Delivered / On Target
SAV / CHI 005 / 20-21	2020-21	Transformation of SEND transport commissioning	Children & Culture	Education & Partnerships	Delivered / On Target
SAV / CHI 008 / 20-21	2020-21	Sharing Costs with CCG for Children with Disabilities - Reprofitting of agreed savings (SAV/CHI 004/19-20)	Children & Culture	Children's Social Care	Delivered / On Target
SAV / HAC 001 / 19-20	2019-20	Efficiencies in Commissioned Services for Adult Social Care	Health, Adults & Community	Integrated Commissioning	Delivered / On Target
SAV / HAC 001 / 20-21	2020-21	Accommodation and support for single homeless people	Health, Adults & Community	Integrated Commissioning	Delivered / On Target
SAV / HAC 002 / 19-20	2019-20	Integrated Commissioning Efficiencies	Health, Adults & Community	Integrated Commissioning	Delivered / On Target
SAV / HAC 002 / 20-21	2020-21	Merging of the physical disability day opportunities service with the Riverside Day Service	Health, Adults & Community	Adult Social Care	Delivered / On Target
SAV / HAC 003 / 19-20	2019-20	Promoting Independence and in Borough Care for Adults with Disabilities	Health, Adults & Community	Adult Social Care	Delivered / On Target
SAV / HAC 004 / 20-21	2020-21	Integration of Tower Hamlets short-term support services - rehabilitation and reablement	Health, Adults & Community	Localities East and Reablement	Delivered / On Target
SAV / HAC 005 / 20-21	2020-21	Technology-enabled care	Health, Adults & Community	Adult Social Care	Delivered / On Target

10,242	10,661	20,903	5,404	11,673	5,099	4,131	Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Delivered/ cashed £'000	Forecast savings £'000	Variance - Slippage £'000	Variance - Under / (over) delivery £'000	Forecast Savings RAG	Project Status RAG	Status update
							-	1,000	1,000		1,000	-	-	Green	Green	
							350	-	350		-	350	-	Red	Red	Slippage due to Covid and deliverability will be dependent on events taking place in 2021/22.
							50	-	50		50		-	Green	Green	
							150	-	150		150		-	Green	Green	This is linked to CHI 002 / 20-21. There may be a risk to the full £506k as part of income generation has been delivered as part this saving.
							350	-	350		115	235	-	Red	Red	Savings for 2021/22 of £250k are unachievable due to slippage. Net budget in 2020/21 is £242k which can be taken in 2021/22.
							-	-	-		-	-	-	Green	Amber	
							-	-	-		-	-	-	Amber	Red	This is part of the Commercialisation agenda and requires Corporate Support.
							494	-	494		494		-	Green	Green	
							50	-	50		50		-	Green	Green	
							-	-	-		-	-	-	Amber	Amber	
							100	-	100		100		-	Green	Green	
							-	-	-		-	-	-	Green	Green	21/22 Saving - Work in progress to specify the services which will deliver savings.
							-	-	-		-	-	-	Green	Green	21/22 - 22/23 Saving - context for this saving significantly impacted by Covid. Funding has been secured and approval in Cabinet for a contract for remodelling of the Hackney Road Hostel as part of our post Covid arrangements for homelessness - this will deliver the saving for Hackney Road in full (green). Work will then be needed on the future approach once the funding ends. Proposals for the reduction in floating support under development (amber).
							190	-	190		190	190	-	Green	Green	Saving has been delivered.
							-	-	-		-	-	-	Amber	Green	21/22 saving - this saving is now proposed to be delivered by a new savings proposal for a new model of day support which would involve the closure of these two centres previously earmarked for merger. Consultation on the new proposal concluded and goes to Cabinet in March 2021. Implementation date Q2 and therefore slippage in savings level in 21/22 requires mitigation.
							-	-	-		-	-	-	Amber	Amber	21/22 saving - progress on the Promoting Independence programme for people with learning disabilities (increasing provision and choice in borough for supported living & residential) is slower than expected but is progressing. This 21/22 saving is being reviewed alongside the existing programme - see below.
							-	-	-		-	-	-	Amber	Amber	Consultation on changing the charging policy was about to launch at the end of March 2020 to ensure delivery of this saving. Consultation postponed due to Covid. Implementation now expected 1/1/21 rather than 1/10/20. Potential loss of saving should be set against Covid expenditure. Consultation has an additional option added that would increase the income received and mitigate the slippage. Option being considered of delivering this saving earlier.
							-	-	-		-	-	-	Green	Green	22/23 Saving - work in progress. The 100k is a marker figure whilst scoping work is done. Likely to require capital which is flagged in the review of the capital programme.

13,158	5,099	18,257	15,638	1,124	1,495	7,172	1,124	8,296	8,296	-	-	Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Forecast savings £'000	Variance - Slippage £'000	Variance - Under / (over) delivery £'000	Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Forecast savings £'000	Variance - Slippage £'000	Variance - Under / (over) delivery £'000	
												-	-	-	-	-	-	-	-	-	-	-	-	-
												-	350	350	350	-	-	-	-	-	-	-	-	-
														50	50	-	-	-	-	-	-	-	-	-
														-	-	-	-	-	-	-	-	-	-	-
														250	242	243	-	-	-	-	-	-	-	-
														512	512	-	-	-	-	-	-	-	-	-
														506	506	506	-	110	-	110	110	-	-	-
														-	-	-	-	406	-	406	406	-	-	-
														450	450	-	-	-	-	-	-	-	-	-
														500	500	-	-	500	-	500	500	-	-	-
														200	200	-	-	311	-	311	311	-	-	-
														1,000	1,000	1,000	-	-	-	-	-	-	-	-
														343	343	343	-	350	-	350	350	-	-	-
														-	-	-	-	-	-	-	-	-	-	-
														316	316	316	-	-	-	-	-	-	-	-
														700	700	700	-	-	-	-	-	-	-	-
														-	-	-	-	100	-	100	100	-	-	-
														-	-	-	-	100	-	100	100	-	-	-

Reference	Year Approved	Title	Directorate	Service Area	Savings Achievement Status	Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Delivered/ cashed £'000	Forecast savings £'000	Variance - Slippage £'000	Variance - Under / (over) delivery £'000	Forecast Savings RAG	Project Status RAG	Status update	Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Forecast savings £'000	Variance Slippage £'000	Variance Under / (over) delivery £'000	Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Forecast savings £'000	Variance - Slippage £'000	Variance Under / (over) delivery £'000	
SAV/ HAC 01 / 18-19	2018-19	Adult Social Care Transformation	Health, Adults & Community	Adult Social Care	Delivered / On Target	1,000	-	1,000	306	506		494	Amber	Amber	£306k delivered through ceasing of meals on wheels - green. c200k delivered through mental health procurement savings - final validation in progress - green/amber. c500k to be delivered through quality and expenditure controls via panels analysis of CSPAM panel shows where achievement of savings has been made however we have experienced upward pressure on other care packages and a net saving has not been achieved - therefore saving green but overall impact not achieved - see finance monitor. Budget review in place to further explore sustainability, demography and delivery plans.	-	-	-	-	-	-	-	-	-	-	-	-	-
ADU003/17-18	2017-18	Helping People with Learning Disability live Independently	Health, Adults & Community	Adults Social Care	Slipping but Achievable	-	706	706		452		254	Amber	Amber	Programme reviewing plans, slippage and any potential to bring forward savings. Plans developing to deliver £452k resulting in £254k slippage to 2021/22. £78k associated with Shared Lives may not be delivered in 2020/21. Review of this programme and the 21/22 further savings (see above) - to come to DLT in March 2021.	-	-	-	254		(254)	-	-	-	-	-	-	
ADU008/17-18	2017-18	Day Opportunities Provision	Health, Adults & Community	Adult Social Care	Slipping but Achievable	-	74	74		74		-	Green	Green	Will be delivered in the current financial year, will need processes in place to ensure that no pressure remains on the placements budget. Linked to other reviews in day centre provision.	-	-	-	-	-	-	-	-	-	-	-	-	-
SAV / HAC 003 / 20-21	2020-21	Changes to the adult social care charging policy	Health, Adults & Community	Adult Social Care	Delivered / On Target	132	-	132		66		66	Amber	Green	Charging Policy amended following consultation and decision in Cabinet. Implementation in progress. Slippage 3/4 months which may impact on in year savings but may be mitigated by higher income achieved overall.	132	-	132	132		-	-	-	-	-	-	-	
D&R002/17-18	2017-18	Maximising use of technology in Housing Options Service	Place	Housing Options	Slipping but Achievable	-	300	300		300		-	Amber	Green	1. The financial saving was not delivered in 2019-20 and has slipped into 2020/21. This savings target relates partly to automating applications to the common housing register and also a review of the allocations policy, both of which have been completed in year but the associated benefit will not be realised until the following year. The financial saving has been mitigated through additional income received from RSL's being charged to use the Council's common housing register where demand has been higher than that budgeted.	-	-	-	-	-	-	-	-	-	-	-	-	
SAV/ PLA 01 / 18-19	2018-19	Waste, Recycling & Street Cleansing Contract	Place	Public Realm	Delivered / On Target	200	-	200		200		-	Green	Green	1. The financial saving will be delivered as part of the in-sourcing of the waste service. The service is now in-house and budgets have been built up including this saving. Careful monitoring of financial performance will occur over the months ahead to monitor delivery. At this point in time it is anticipated the saving will be delivered with no overspend forecast against budget	-	-	-	-	-	-	-	-	-	-	-	-	
SAV/ PLA 02 / 18-19	2018-19	Review of Housing Delivery (THH/TH)	Place	Housing /THH	Delivered / On Target	100	-	100		-		100	Red	Red	1. The saving relates to efficiencies generated from in-sourcing THH. 2. The saving cannot be delivered as the ALMO management agreement has been extended for a minimum of four more years. 3. There may be opportunities to generate efficiencies when THH come to the new town hall. 4. The saving is unachievable and should be written off	-	-	-	-	-	-	-	-	-	-	-	-	
SAV/ PLA 03 / 18-19	2018-19	Reduction in Running costs/ Liability of Council Assets	Place	Corporate Property & Capital Delivery	Slipping but Achievable	100	-	100		100		-	Amber	Amber	1. This saving will be added to the £1m saving to be delivered in 2021/22, giving a target of £1.1m. 2. An asset review and income maximisation board has been set up and options for delivering the £1.1m are being worked up and presented to the board. There are options available to deliver the saving in full and the £100k saving. 3. Lead in times for delivering the savings may result in it slipping into next year.	-	100	100	100		-	-	-	-	-	-	-	
SAV / PLA 002 / 19-20	2019-20	Appropriation of Housing Revenue Account (HRA) Shops to General Fund (GF)	Cross-Directorate	Asset Management	Undeliverable / Unachievable		800	800				800	Red	Red	1. Financial modelling of the proposal has identified that the rental income is not substantial enough to meet the capital financing requirement that will also transfer to the GF and as a result appropriating these assets. The appropriation has therefore not taken place and the saving not delivered. 2. This saving is being requested to be written-off through the 2021-24 MTFS budget setting process.	-	-	-	-	-	-	-	-	-	-	-	-	
SAV / PLA 005 / 19-20	2019-20	Parking – Operational Changes and Policy Review	Place	Parking	Delivered / On Target	500	-	500		500		-	Green	Green	1. 2020/21 saving - introduction of permits for car clubs will generate additional income of £200k. This will be introduced and is expected to deliver the income target. Introduction of surcharges on permits has delivered the £180k saving target in 2018/19. The remaining £120k will result from savings on introducing a cashless Ringo payments system and again is on schedule for delivery. 2. In 2021/22 a further saving of £329k will be delivered through a wider review of parking which is being worked up in conjunction with the Mayor. Considerations include diesel levies on permits and paid for parking, which would be big income items and deliver the saving.	329	-	329	329		-	-	-	-	-	-		
SAV / PLA 006 / 19-20	2019-20	Waste Fleet Alternative Funding	Place	Waste - Public Realm	Delivered / On Target	1,800	-	1,800		1,800		-	Green	Green	1. The saving related to using alternative methods of funding vehicles used within Operational services. The vehicles have been purchased through capital investment delivering a saving against the revenue budget	-	-	-	-	-	-	-	-	-	-	-	-	-

Reference	Year Approved	Title	Directorate	Service Area	Savings Achievement Status	Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Delivered/cashed £'000	Forecast savings £'000	Variance - Slippage £'000	Variance - Under / (over) delivery £'000	Forecast Savings RAG	Project Status RAG	Status update	Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Forecast savings £'000	Variance - Slippage £'000	Variance - Under / (over) delivery £'000	Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Forecast savings £'000	Variance - Slippage £'000	Variance - Under / (over) delivery £'000
SAV / PLA 001 / 20-21	2020-21	Property Asset Strategy	Place	Corporate Property & Capital Delivery	Delivered / On Target	-	-	-	-	-	-	-	Amber	Amber	1. An asset review and income maximisation board has been set up and options for delivering the £1.1m are being worked up and presented to the board. There are options available to deliver the saving in full but rent holidays that lessees require to enter into agreements may result in some of the saving slipping.	1,000	-	1,000	1,000	-	-	-	-	-	-	-	
SAV / PLA 002 / 20-21	2020-21	Deletion of dedicated business assurance function for Place Directorate	Place	Growth and Economic Development	Delivered / On Target	56	-	56	-	56	-	-	Green	Green	1. The post has been deleted and the saving delivered.	-	-	-	-	-	-	-	-	-	-	-	-
SAV / PLA 003 / 20-21	2020-21	New Town Hall revenue savings	Place	Corporate Property & Capital Delivery	Delivered / On Target	-	-	-	-	-	-	-	Green	Green	1. The project to deliver a new town hall is progressing and on target, however it is currently too early to be certain that the required revenue savings will be delivered. 2. This is a 2022/23 saving and will be assessed in later years.	-	-	-	-	-	-	225	-	225	225	-	-
SAV / PLA 005 / 20-21	2020-21	Review of Parks - Reprofitting of agreed savings (SAV/PLA 05/18-19)	Place	Sport Leisure and Culture	Delivered / On Target	-	-	-	-	-	-	-	Green	Green	A parks review is currently being undertaken which is led by SPP. Children's and Place are working together to deliver the saving over the whole parks service. To date options for delivering the saving in full have been identified and are currently being considered.	-	-	-	-	-	-	300	-	300	300	-	-
SAV / PLA 006 / 20-21	2020-21	Street Lighting Efficiencies - Reprofitting of agreed savings (SAV/ PLA 04 / 18-19)	Place	Public Realm	Delivered / On Target	45	-	45	-	45	-	-	Green	Green	1. The saving relates to replacing street lighting with LED bulbs, reducing the electricity used and cost of street lighting. Although the bulbs will be replaced there is a risk it will not deliver the saving as the cost of electricity is rising at above inflation rates year on year. Current forecasts project that the saving will be delivered in full but it is subject to the volatility of utility costs.	135	-	135	135	-	-	-	-	-	-	-	
SAV / GOV 001 / 20-21	2020-21	Legal services	Governance	Legal Services	Delivered / On Target	-	-	-	-	-	-	-	-	-	-	100	-	100	100	-	-	200	-	200	200	-	-
SAV / GOV 002 / 20-21	2020-21	Modernisation of the Registration Service	Governance	Registration Service	Delivered / On Target	-	-	-	-	-	-	-	-	-	-	40	-	40	40	-	-	-	-	-	-	-	-
RES001a/17-18	2017-18	Human Resources	Resources	Human Resources	Slipping but Achievable	-	700	700	-	-	700	-	Red	Red	1. A restructure was implemented in HR against the original savings target, however this did not achieve the full savings. A further restructure and other alternative ways of achieving the residual saving of £0.7m are being considered. 2. This saving is being requested through the 2021-24 MTFS to be re-profiled to 2023-24.	-	700	700	-	700	-	-	700	700	-	-	
RES001b/17-18	2017-18	Human Resources	Cross-Directorate	All	Delivered / On Target	-	2,000	2,000	2,000	2,000	-	-	Green	Red	1. Previous year savings of £2.5m were achieved through procurement of a less-expensive agency intermediary provider. 2. Training and development previous year savings were achieved. 3. Remaining £2m savings target relates to terms and conditions changes and this saving has been offset in 2020-21 against the central £2m budget originally earmarked to fund spinal point increases which directorates are now managing within their overall budgets.	-	-	-	-	-	-	-	-	-	-	-	
SAV / RES 02 / 18-19	2018-19	HR Services - Additional Staffing Efficiencies	Resources	Human Resources	Delivered / On Target	100	-	100	67	100	-	-	Green	Green	1. Efficiencies have been achieved.	-	-	-	-	-	-	-	-	-	-	-	-
SAV / RES 01 / 18-19	2018-19	Improved Recovery of Housing Benefits Overpayments	Resources	Benefits	Slipping but Achievable	500	-	500	-	-	500	-	Red	Amber	1. This saving will not be achieved in 2020-21 due to the economic impact of Covid-19 and this savings slippage has been requested to be funded in 2020-21 through the Covid-19 emergency grant.	-	500	500	500	-	-	-	-	-	-	-	
SAV / RES 03 / 18-19	2018-19	Internal Audit – Streamline Management and Explore Shared Service Options	Resources	Risk Assessment	Delivered / On Target	50	-	50	33	50	-	-	Green	Green	1. This saving will be achieved in 2020-21 through holding vacancies, and will be permanently achieved in the future Finance, Procurement & Audit review of the 2019 restructure.	-	-	-	-	-	-	-	-	-	-	-	-
SAV / RES 04 / 18-19	2018-19	Revenue Services – Workforce efficiencies through greater self-service and automation	Resources	Revenue Services	Delivered / On Target	100	-	100	67	100	-	-	Green	Green	1. This has been achieved through a restructure.	-	-	-	-	-	-	-	-	-	-	-	-
SAV / RES 10 / 18-19	2018-19	Additional Local Presence Efficiencies	Resources	Customer Access	Slipping but Achievable	300	-	300	-	-	300	-	Amber	Amber	1. This saving is being mitigated in 2020-21 and is planned for permanent achievement in 2021-22 together with wider Local Presence changes.	-	300	300	300	-	-	-	-	-	-	-	-
SAV / RES 001 / 19-20	2019-20	Improvements in Self Service and Digital uptake for Council Tax and Business Rates	Resources	Revenue Services	Delivered / On Target	-	-	-	-	-	-	-	-	-	-	200	-	200	200	-	-	-	-	-	-	-	-
SAV / RES 002 / 19-20	2019-20	Reduction in Funding for Discretionary Rates Relief	Resources	Revenue Services	Delivered / On Target	220	-	220	147	220	-	-	Green	Green	1. This has been achieved through alternative efficiencies.	-	-	-	-	-	-	-	-	-	-	-	-
SAV / RES 001 / 20-22	2020-21	Revenues - Cashiers - reduce cash and cheque handling and eliminate the need for cheque printing	Resources	Revenue Services	Delivered / On Target	130	-	130	87	130	-	-	Green	Green	1. This has been achieved through a restructure.	-	-	-	-	-	-	-	-	-	-	-	-
SAV / RES 002 / 20-21	2020-21	Benefits service – centralisation of assessments – service review and restructure	Resources	Benefits Service	Slipping but Achievable	600	-	600	-	-	600	-	Red	Amber	1. This restructure has been delayed due to needing to facilitate grant payments and new business rates reliefs relating to the Covid-19 pandemic and a significant increase in the number of residents submitting new claims for Council Tax Reduction. 2. Replacement funding of £0.6m has been requested from the Covid-19 emergency grant to meet this short-term pressure in 2020-21.	100	600	700	700	-	-	100	-	100	100	-	-

Reference	Year Approved	Title	Directorate	Service Area	Savings Achievement Status	Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Delivered/cashed £'000	Forecast savings £'000	Variance - Slippage £'000	Variance - Under / (over) delivery £'000	Forecast Savings RAG	Project Status RAG	Status update	Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Forecast savings £'000	Variance Slippage £'000	Variance Under / (over) delivery £'000	Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Forecast savings £'000	Variance - Slippage £'000	Variance Under / (over) delivery £'000	
SAV / RES 003 / 20-21	2020-21	ICT Savings - Reprofiting of agreed savings (SAV/ RES 05 / 18-19)	Resources	ICT	Delivered / On Target	200	-	200	133	200			Green	Green	1. The telephony IVR rationalisation saving of £0.1m has been achieved. 2. The rack rationalisation has been delayed due to supporting the Covid-19 BECC and will achieve part year savings of £0.04m in 2020-21. Efficiencies in contracted services will meet the short-term £0.06m savings delay pressure in 2020-21.	550	-	550	550			-	-	-	-	-	-	
SAV / RES 004 / 20-21	2020-21	Finance Services – Process improvements & new Finance System Implementation - Reprofiting of agreed savings (SAV/ RES 06 / 18-19)	Resources	Corporate Finance	Delivered / On Target	-	-	-								-	-	100	100			-	-	100				
ALL009/17-18	2017-18	Consolidation of Business Support and Administration Functions	Resources	All	Slipping but Achievable	-	1,000	1,000	350	700	300		Amber	Amber	1. Phase 1 restructure has been implemented and phase 2 planning is underway to achieve the remaining savings.	-	300	300	300			-	-	-	-	-		
ALL001/17-18	2017-18	Review of Printing/ Scanning/ Use of Multi-Functional Devices (MFD's)	Cross-Directorate	All	Undeliverable / Unachievable	-	1,350	1,350			371	979	Red	Red	1. The MFD and Reprographics elements of the project are delivered. 2. A hybrid mail solution for outward mail will be implemented to achieve savings of £371k in 2021-22. 3. Remaining unachievable savings of £979k are being requested to be written off through the 2021-24 MTFS budget setting process.	-	371	371	371			-	-	-	-	-		
ALL003/17-18	2017-18	Debt Management & Income Optimisation	Cross-Directorate	All	Undeliverable / Unachievable	-	1,581	1,581			143	1,438	Red	Red	1. £1,419k savings have been achieved through 2020-21 growth in Council tax base above original MTFS assumption (£974k) and fees & charges income (£445k) allocated against this income optimisation saving. 2. £1,581k savings remain unachieved at 2020-21. Growth in Council tax base above original MTFS assumption for 2021-22 (£69k) and 2022-23 (74k) will also be allocated against this saving, leaving £1,438k which is being requested to be written off through the 2021-24 MTFS budget setting process.	-	143	143	69	74			-	-	74	74		
ALL006/17-18	2017-18	Local Presence / Contact Centre Review	Cross-Directorate	All	Slipping but Achievable	-	1,150	1,150			1,150		Red	Red	1. Implementation of the new Customer Access model achieved £900k of savings from One Stop Shop closures and establishment changes from channel shift. 2. Remaining savings include shift of customer access to 'digital by default' to reduce demand (including housing options and pest control), closure of Rushmead One Stop Shop site and consolidation of high volume telephone contact into contact centre.	-	1,150	1,150	1,150			-	-	-	-	-		
SAV / RES 08 / 18-19	2018-19	Income Through Housing Companies	Cross-Directorate	Housing	Slipping but Achievable	250	-	250			250		Red	Red	1. There is currently no activity within the housing companies and as a result savings are not projected to be delivered at this time. 2. A review of the use of the housing companies is being undertaken with a view to having a clear strategy around their roles and any savings that could be delivered. 3. This saving is being requested through the 2021-24 MTFS to be re-profiled to 2023-24.	-	250	250	250			-	-	250	250			
SAV / RES 09 / 18-19	2018-19	THH - Potential support service Savings	Cross-Directorate	Housing	Slipping but Achievable	100	-	100			100		Red	Red	1. The saving relates to support service savings from the in-sourcing of THH. 2. A decision has been taken to retain the current ALMO for a minimum of four years and as a result the saving will not be delivered at this time. 3. This saving is being requested through the 2021-24 MTFS to be re-profiled to 2023-24.	-	100	100	100			-	-	100	100			
SAV / ALL 001 / 19-20	2019-20	Phase 2 Local Presence - putting Digital First	Cross-Directorate	Cross-Directorate / Resources - Various	Delivered / On Target	-	-	-								700	-	700	700			-	-	-	-	-		
SAV / ALL 002 / 19-20	2019-20	Counter Fraud Initiatives	Cross-Directorate	Cross-Directorate / Resources - Risk and Audit	Delivered / On Target	-	-	-								100	-	100	100			-	-	-	-	-		
SAV / ALL 003 / 19-20	2019-20	Contract Management	Cross-Directorate	Cross-Directorate / Resources - Various	Delivered / On Target	500	-	500	500	500			Green	Amber	1. Savings have been allocated to service directorates. Contracts within directorates need to produce average efficiencies of circa 6% through tenders and direct negotiations.	1,000	-	1,000	1,000			-	-	-	-	-		
SAV / ALL 004 / 19-20	2019-20	Reduction in Enabling and Support Services Costs	Cross-Directorate	Cross-Directorate / Resources - Various Support Services	Delivered / On Target	-	-	-								1,500	-	1,500	1,500			-	-	-	-	-		
SAV / ALL 005 / 19-20	2019-20	Asset Management Service	Cross-Directorate	Cross-Directorate / Place / Children's Services - Asset Management	Delivered / On Target	-	-	-					Amber	Amber	The Asset Management Team is in the process of formulating the programme to deliver the Council's Asset Strategy. The programme will consist of a range of projects that focus on making the best of Council property with outcomes including: community asset transfer options, development opportunities, disposals and reduced running costs. Work is underway to deliver the saving.	500	-	500	500			-	-	-	-	-		
SAV / ALL 001 / 20-21	2020-21	Contract Management Efficiencies - Reprofiting of agreed savings (SAV/CORP 02 / 18-19)	Cross-Directorate	All	Delivered / On Target	1,400	-	1,400	1,400	1,400			Green	Amber	1. Savings have been allocated to service directorates. Contracts within directorates need to produce average efficiencies of circa 6% through tenders and direct negotiations.	900	-	900	900			-	-	1,950	1,950			
SAV / ALL 002 / 20-21	2020-21	Greater Commercialisation - Reprofiting of agreed savings (SAV/ ALL 007 / 19-20)	Cross-Directorate	All	Delivered / On Target	-	-	-								500	-	500	500			-	-	2,000	2,000			

Reference	Year Approved	Title	Directorate	Service Area	Savings Achievement Status	Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Delivered/cashed £'000	Forecast savings £'000	Variance - Slippage £'000	Variance - Under / (over) delivery £'000	Forecast Savings RAG	Project Status RAG	Status update	Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Forecast savings £'000	Variance Slippage £'000	Variance Under / (over) delivery £'000	Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Forecast savings £'000	Variance - Slippage £'000	Variance - Under / (over) delivery £'000		
SAV / ALL 003 / 20-21	2020-21	Fees & Charges	Cross-Directorate		Delivered / On Target	125	-	125	125	125			Green	Green	1. Savings have been allocated to service directorate income budgets that were agreed for increased fees & charges.	545	-	545	545			-	420	-	420	420			-

Appendix C: 2020-21 Covid-19 Financial Forecast Summary at 22 February 2021	£m	£m	£m	£m	£m	Comments
Expenditure (General Fund)				41.1		Excluding passported support for businesses
2019-20 expenditure allocated to Covid-19 emergency grant				0.1		
Reduced income not relating to sales, fees & charges and claimed against non-ringfenced grant (General Fund)		5.6				
Sales, fees & charges income expected to be reimbursed (General Fund)		7.6				
Sales, fees & charges income not being reimbursed, claimed against non-ringfenced grant (General Fund)		1.1				
Total reduced income (General Fund)				14.3		Excluding Collection Fund (Business Rates and Council Tax)
Grand Total - expenditure and reduced income					55.5	Excluding passported support for businesses
Sales, Fees & Charges reduced income reimbursement claims			(7.6)			Actual claims for April to July 2020 (£3.0m) and August to November (£2.5m).
NHS (Clinical Commissioning Group) funding for Covid			(4.3)			
Covid-19 emergency grant			(38.1)			Including £0.1m allocated in 2019-20
Next Steps Accommodation Programme (Short Term)			(1.3)			
Welfare Support Fund			(0.4)			
Test, Track and Contain Grant (Local Outbreak Fund)			(3.2)			
Test, Track and Contain Grant (Self Isolation Grant)			(1.0)			
Infection Control Grants			(2.0)			
Contain Outbreak Management Fund (COMF)			(2.6)			
Covid Winter Grant Scheme			(1.2)			
Additional Burdens Funding for business grants schemes administration			(0.2)			
Additional Burdens Funding for Council Tax Hardship Fund administration			(0.2)			
Additional Burdens Funding for administering the Local Restriction Grants			(0.2)			
Local Authority Compliance and Enforcement Grant (Covid Marshalls)			(0.3)			
Reopening High Streets Safely			(0.3)			
Rough Sleepers - Protect Programme			(0.1)			
Suspension of the deregation (EEA Homeless)			(0.1)			
Emergency Active Travel Fund (Revenue)			(0.1)			
Total government and NHS funding related to forecast expenditure and reduced income					(63.0)	
Grand Total - Forecast deficit/(surplus) in government funding (excluding Collection Fund and reserves carry forward)					(7.5)	This excludes the Collection Fund deficit that will impact in 2021-22 to 2023-24.
Collection Fund:						
Business Rates (NNDR) reduced income				2.6		Council share only on an accruals basis (billed not collected). 25% of deficit due to 75% government deficit funding.
Council Tax reduced income				1.4		Council share only on an accruals basis (billed not collected). 25% of deficit due to 75% government deficit funding.
Total Collection Fund deficit					3.9	This will have an impact over 2021-22 to 2023-24
Council Tax Hardship Fund					(4.4)	To be moved into Collection Fund reserve for impact of potential further deficits in the Collection Fund.

Housing Revenue Account (HRA):

Expenditure (HRA)	1.3	
Reduced income (HRA)	2.7	Income not eligible for SF&C reimbursement claim
Housing Revenue Account (HRA) Covid costs not assumed as funded from the Covid non ring-fenced grant	4.0	

Passported Covid-19 government support for businesses:

Covid-19 business rates (NNDR) relief for businesses	(97.8)	
Small business grants	(78.8)	
Top Up for businesses	(3.9)	
Local Restrictions Support Grants	(13.8)	Includes Additional Restrictions Grant for discretionary payments in 2020-21 and 2021-22.
Christmas Support Payment for wet-led pubs	(0.1)	
Total passported Covid-19 government support for businesses	(194.4)	

Grants for which the associated expenditure is not included above:

Next Steps Accommodation Programme (Long Term)	(2.5)	For expenditure incurred 2020-21 to 2023-24
Funding for clinically extremely vulnerable (Shielding Grant)	(0.1)	
Emergency Active Travel Fund (Capital)	(0.1)	
2021-22 Covid-19 non-ringfenced emergency grant	(13.0)	
2021-22 Local Council Tax Support Grant	(4.0)	S31 grant for anticipated additional costs of providing Local Council Tax support in 2021-22, resulting from increased unemployment.
Total grants for which the associated expenditure is not included above	(19.7)	The Council will incur new expenditure against these grants

Appendix D – Capital Programme Monitor 2020-21 Period 9

General Fund capital programme monitor 2020-21 Period 9


Theme	Directorate	Programme	Nov Budget 2020-21 (£m)	P9 Forecast 2020-21 (£m)	Actual P9 (£m)	Variance Nov Budget Vs P9 over / (under) spend forecast (£m)
Approved Programme	Children's	Basic Need/Expansion	7.270	7.309	1.992	0.039
		Provision for 2-year olds	0.428	0.130	0.113	(0.298)
	Health Adults and Community	Adult Social Care	0.513	0.153	0.000	(0.360)
		Community Safety	3.400	0.226	0.000	(3.174)
		Public Health	8.327	3.873	1.144	(4.454)
		Place	Asset Maximisation	0.300	0.170	0.118
	Place	Carbon Offsetting	1.310	0.525	0.276	(0.785)
		CIL Schemes - South Dock Bridge	7.471	0.250	0.143	(7.221)
		Community Hubs/Buildings	0.634	0.982	0.810	0.348
		Culture	1.815	0.050	0.036	(1.765)
		Montefiore Centre Refurbishment Programme	0.758	0.200	0.070	(0.558)
		Parks	2.928	4.103	2.131	1.175
		Public Realm Improvements	11.104	10.807	4.443	(0.297)
		Registered Provider Grant Scheme (from 1-4-1)	6.108	0.000	0.000	(6.108)
		S106 Schemes	3.886	1.261	0.418	(2.625)
		Section 55 Programme - Transport and Improvements	0.440	0.000	0.000	(0.440)
		St Georges Town Hall Refurbishment Programme	0.253	0.600	0.500	0.347
		TfL Schemes	0.427	1.130	0.828	0.703
		Thriving High Streets Pilot Programme	0.056	0.056	0.054	0.000
		Transport S106 Funded Schemes	0.796	0.796	(0.010)	0.000
		Whitechapel New Town Hall	50.195	34.413	16.408	(15.782)
		Resources	Smarter Working	3.867	9.132	5.511
	Approved Prog Total			112.286	76.165	34.984

Theme	Directorate	Programme	Nov Budget 2020-21 (£m)	P9 Forecast 2020-21 (£m)	Actual P9 (£m)	Variance Nov Budget Vs P9 over / (under) spend forecast (£m)
Annual Rolling	Children's Health Adults and Community	Conditions and Improvement	3.991	3.155	1.990	(0.836)
Programme	Place	Adult Social Care (DFG)	0.300	0.000	0.000	(0.300)
		Disabled Facilities Grants	1.635	0.600	0.406	(1.035)
		Investment works to LBTH Assets	2.141	2.187	0.707	0.046
		Local Infrastructure Initiatives	3.000	0.387	0.007	(2.613)
		Private Sector Improvement Grants	0.100	0.050	0.014	(0.050)
		Public Realm Improvements	5.400	5.000	0.663	(0.400)
Annual Rolling Programme Total			16.567	11.378	3.787	(5.189)
Invest to Save	Place	Conversion of council buildings to temporary accommodation	2.213	0.980	0.089	(1.233)
		Public Realm Improvements	4.242	4.242	2.102	0.000
		Purchase of properties for use as Temporary Accommodation and purchase of s106 properties	30.000	13.000	9.280	(17.000)
	Resources	Loan	3.530	0.000	0.000	(3.530)
Invest to Save Total			39.984	18.222	11.470	(21.763)
Completed	Place	ICT Solution - Handheld Devices	0.000	0.015	0.015	0.015
		Idea Store	0.008	0.009	0.006	0.001
		Improving Air Quality		0.023	0.009	0.023
		OPTEMS		0.023	0.023	0.023
	Resources	Local Presence Project		0.003	0.003	0.003
	Health Adults and Community	Tele Care/Telehealth Equipment		0.004	0.004	0.004
Completed	All Directorates	Completed	0.470		0.000	(0.470)
Completed Total			0.478	0.077	0.059	(0.401)
General Fund Total			169.315	105.841	50.301	(63.474)

HRA capital programme monitor 2020-21 Period 9

Theme	Directorate	Programme	Nov Budget 2020-21 (£m)	P9 Forecast 2020-21 (£m)	Actual P9 (£m)	Variance Nov Budget Vs P9 over / (under) spend forecast (£m)
Annual Rolling	Housing Revenue Account	Housing Capital Programme	24.512	17.814	9.129	(6.698)
Approved Prog	Housing Revenue Account	Ocean Estate Regeneration	0.719	0.719	0.006	0.000
		Blackwall Reach	2.145	2.145	1.238	0.000
		Phase 2a Infill Pipeline Schemes (1-4-1)	10.565	7.000	4.469	(3.565)
		New Supply - On site	11.95	3.000	2.103	(8.950)
		New Supply Preconstruction (Phase 1)	6.856	4.000	1.701	(2.856)
		Mayor's Priority - Housing	2.717	2.717	0.242	0.000
		Phase 2b Mixed Tenure Schemes (1-4-1)	2.563	6.000	3.700	3.437
		The Purchase of S106 Properties	15.374	15.374	(0.159)	0.000
Approved Programme Total			52.889	40.955	13.298	(11.934)
HRA Total			77.401	58.769	22.427	(18.632)
Grand total capital (GF and HRA)			246.718	164.610	72.728	(82.108)

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<p>Cabinet</p> <p>3 March 2021</p>	
<p>Report of: Will Tuckley, Chief Executive</p>	<p>Classification: Unrestricted</p>
<p>Strategic delivery and performance report – quarter 3 2020/21</p>	

Lead Member	John Biggs, Executive Mayor Cllr Asma Begum, Deputy Mayor for Children, Youth Services and Education
Originating Officer(s)	Sharon Godman, Divisional Director Strategy, Policy & Performance Thorsten Dreyer, Head of Intelligence & Performance
Wards affected	All wards
Key Decision?	No
Forward Plan Notice Published	3 September 2020
Reason for Key Decision	This report has been reviewed as not meeting the Key Decision criteria.
Strategic Plan Priority / Outcome	All Strategic Plan priorities and outcomes

Executive Summary

This report provides Cabinet with an update on the delivery and implementation of the council's Strategic Plan in quarter 3 of 2020/21.

Recommendations:

The cabinet is recommended to:

1. Note the strategic delivery and performance report for quarter 3 2020/21.
2. Review the performance of the strategic measures, including those measures where the minimum expectation has been missed; and
3. Review progress in delivering the council's Strategic Plan.

1 REASONS FOR THE DECISIONS

- 1.1 The council is committed to improving outcomes for residents. Our corporate priorities and outcomes are found in our Strategic Plan and provide a framework for action.

- 1.2 Our Performance & Accountability Framework sets out the process for monitoring the timely and effective delivery of the Strategic Plan to improve outcomes for residents. In line with the framework, Cabinet receives regular update reports to ensure oversight of pace, delivery, performance and improvement activities.
- 1.3 This report promotes openness, transparency and accountability by enabling Tower Hamlets residents to track progress of activities that impact on their lives and the communities they live in.

2 ALTERNATIVE OPTIONS

- 2.1 Cabinet can decide not to review the delivery and performance information. This is not recommended as Members have a key role to review and challenge underperformance and to utilise performance information to inform resource allocation.

3 DETAILS OF THE REPORT

3.1 Background

- 3.2 The Strategic Plan is the councils' main business plan and embeds the priorities of the administration into council delivery. This report provides Cabinet with an update on the delivery and implementation of the council's Strategic Plan to the end of quarter 3 2020/21.

- 3.3 The council is committed to making Tower Hamlets a safer, cleaner, fairer borough. In 2018 we adopted three new corporate priorities and 11 outcomes that provide a framework for action to improve outcomes for our residents.

3.4 Performance summary

- 3.5 Over the last quarter, like most councils, we have continued to focus our efforts on responding to the pandemic, supporting residents and businesses through the second lockdown in the autumn, the new tiered restrictions, and the current lockdown. We have continued to prioritise protecting the most vulnerable and those most at risk during the pandemic, contacting more than 8,000 shielding residents during more recent lockdowns, advising them of the support we can provide. More than 5,000 households have contacted us through our dedicated Covid-19 support line or online form, and we have provided advice and support to more than 15,000 individuals.
- 3.6 We have put in place the infrastructure needed to support the test and trace programme, opening five test centres in key locations across the borough. Working with NHS and other key partners we prepared for the roll out of the vaccine to the most vulnerable, including older residents, key workers and residents in care homes from January onwards.

- 3.7 Our employment and business support services are delivering new projects to help businesses and people impacted by the pandemic. The PIVOT Project helps businesses adapt their business models to rapidly changing times, while free masterclasses for businesses give advice on social media and improving their online sales presence. We are working with small high street retailers helping them develop their online sales through local sustainable delivery networks. Through the Kickstart programme for young people who have lost their jobs through the pandemic we have secured employment opportunities with local businesses for our young people.
- 3.8 Alongside this we have put in place plans to support the recovery from the wider impacts of the pandemic. We are building on our assessment of the impact, which we published in July, and we are now starting to plan for next year.
- 3.9 Covid-19 restrictions continue to have an impact on our ability to deliver many of our normal services and this in turn impacts on strategic plan delivery and performance. Where possible we are keeping services running in line government guidance and Covid-19 regulations. Some services remain open remotely only, others have reduced capacity while some are closed entirely at the moment.
- 3.10 The quarterly strategic delivery and performance summarises what we have delivered, how we have made a difference to people's lives, and how we have performed against our strategic outcome indicators.
- 3.11 The restrictions in place are now starting to impact on our performance indicators and our ability to deliver our strategic plan commitments. The economic impact of the pandemic means that our WorkPath service is not able to help people into jobs as businesses are not hiring. Affordable homes completions have slowed down due to restrictions placed on the construction industry. School attendance is lower than we would normally expect to see as pupils and entire year groups have had to self-isolate at times. Similarly, our own staff have been affected and our sickness absence rate has been rising, meaning some of our services have been operating with reduced capacity.
- 3.12 At the end of quarter 3 2020/21, 15 performance indicators have met or are exceeding their target and 8 are between the target and the minimum expectation, while 13 are falling short. The remaining 20 indicators are data only measures, do not have an outturn this quarter or they are based on our annual residents' survey which is due to take place in quarter 4. Due to Covid-19 there are also some indicators for which data collection was suspended or not possible and is now resuming. These include school attendance as schools were operating for small numbers of pupils only during much of the summer term.
- 3.13 Indicators that are exceeding the target broadly fall into the main areas of the business as set out below. Full details of all indicator performance can be found in appendix 1.

Education, skills, employment and income

- Number of SMEs and new enterprises supported through the council's business programme
- Percentage of Idea Store learners who pass a course
- Percentage of Idea Store learners who pass their English for Speakers of Other Languages (ESOL) course
- Percentage of 16 - 17 year olds in education, employment or training
- Women supported into employment by the Workpath service
- Residents who come from deprived postcodes supported into employment by the Workpath service

Health, social care and safeguarding

- Percentage of long-term looked after children who are in stable placements
- Residential and nursing admissions (over 65s)

Environment and sustainability

- Primary school pupils benefiting from a school street at their school (traffic reduction outside the school)

Housing supply and homelessness

- Lets to overcrowded households
- Homeless households moved into permanent social housing
- Households prevented from becoming homeless

Community safety

- Young people engaging with the youth service who achieve a recorded outcome
- Victims of violence against women and girls or hate crime who feel safer after engaging with victim support

Customer service and how we work as a council

- Media and press view of the council

3.14 Indicators that are falling short of the minimum expectation broadly fall into the main areas of the business as set out below:

Education, skills, employment and income

- Number of adults supported into employment by the Workpath service
- Residents who have disabilities supported into employment by the Workpath service
- Average annual income increase for residents receiving benefit maximisation support
- Resident Universal Credit application support
- Number of adults supported into employment by the Workpath partnership

Environment and sustainability

- Level of public realm cleanliness (litter)

Housing supply and homelessness

- Level of affordable homes permitted (by habitable room)
- Level of affordable homes completed (by habitable room)

Health, social care and safeguarding

- People who are more independent after being supported through reablement services
- Families who are seeing the benefits of being supported before problems escalate

Community safety

- Drug users (opiate users) successfully completing treatment

Customer service and how we work as a council

- Council staff sickness absence rate
- Budget variance for the general fund

3.15 *Setting targets and improving outcomes*

3.16 The council is committed to driving improvement which sees us deliver high performing services and in turn improved outcomes for our residents. As part of our move to becoming an outcomes-based organisation, we have introduced a more mature approach to performance management which seeks improvement while at the same time taking into account more clearly the operating realities we face.

3.17 We need to consider factors affecting local government today. For example, budgetary constraints mean we have to do more with less whilst our population continues to grow, and expectations rise.

3.18 Absolute numerical improvement is often less appropriate now that we have refocussed our activities on improving the life chances of our most vulnerable residents. A focus on numerical improvement can drive the wrong kind of behaviour and place the focus in the wrong area of concern.

3.19 Our improvement journey has been steep, and whilst there is no doubt that we need to continue improving, there is also recognition that sustainability is important. Improvements and new ways of working take time to bed in, and our targets need to reflect this.

3.20 Our target setting principles take these challenges into consideration:

- We will only set targets for performance indicators and not for contextual indicators. Contextual indicators are those less directly in the council's control but which are important for prioritising council investments and actions.

- Targets will be set using a bandwidth approach consisting of a target and a minimum expectation.
- The target (upper bandwidth) should adhere to one or more of the following target setting principles:
- Be aligned to an external target, such as a statutory, national or Mayoral manifesto target, or target in strategies and policies where they have been agreed by Cabinet or a Tower Hamlets Partnership group;
- Aim to improve on our benchmark performance position within the appropriate benchmark family group or maintain a high level of performance where we are among top performing councils;
- Be based on management information evidence, especially for new measures where targets have previously not been set;
- Take account of operational practicalities as described below;
- In relation to perception surveys, we will monitor the direction of travel rather than set specific targets.
- Targets for all measures are set against the operating realities of the service – for example service changes, funding changes, changes in legislation or in local or national policy. These changes may result in the need to re-baseline the targets from one year to the next to reflect the changing circumstances in which the service operates.

3.21 The Covid-19 pandemic and subsequent and ongoing recovery has had a significant impact on many services. Our target setting principles take these challenges into consideration.

3.22 Changes that have had occurred as a result of Covid-19 can be taken into consideration under the last principle. Where services have had to cease or significantly alter operations in response to government guidelines we have adjusted existing targets accordingly, where needed, to ensure they remain realistic. For example, cumulative targets will not include periods during which services were suspended. Targets also take into consideration, where possible, any further impacts Covid-19 may have on services.

4 EQUALITIES IMPLICATIONS

4.1 The council's Strategic Plan is focused on meeting the needs of the diverse communities living in Tower Hamlets and ensuring that everyone can play their part in a vibrant and cohesive community. The strategic outcomes and supporting activities are designed to reduce inequalities and the foster community cohesion. Equalities considerations are embedded in all outcomes of the Strategic Plan with specific actions focusing on areas of inequality identified through the Borough Needs Assessment being addressed under Outcome 4 - Inequality is reduced and people feel that they fairly share the benefits from growth.

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 (BV) Implications*

5.3 Section 3 of the Local Government Act 1999 requires the council as a best value authority 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”. Monitoring of performance information and acting on the findings is an important way in which that obligation is being fulfilled.

5.4 *Sustainable action for a greener environment*

5.5 Outcome 5 - People live in a borough that is clean and green is dedicated to taking sustainable action for a cleaner environment. It focuses on key areas of sustainability, including air quality, waste and carbon emission. Key activities include work to drive up the borough’s recycling rate, reducing CO2 emissions, and implementing a number of initiatives to improve air quality, including making Tower Hamlets one of the best boroughs for walking and cycling through our Liveable Streets programme.

5.6 *Risk management implications*

5.7 In line with the council’s risk management strategy, the information contained within the strategic indicator monitoring will assist Cabinet, Corporate Directors and relevant service managers in delivering the ambitious targets set out in the Strategic Plan. Regular monitoring reports will enable Members and Corporate Directors to keep progress under regular review.

5.8 *Crime and disorder reduction implications*

5.9 Strategic Plan Outcome 7 - People feel safer in their neighbourhoods and anti-social behaviour is tackled and Outcome 8 – People feel they are part of a vibrant and cohesive community are dedicated to crime and disorder reductions. Activities under these outcomes are designed to improve safety, the perception of safety and community cohesion.

5.10 *Safeguarding implications*

5.11 Strategic Plan Outcome 2 - Children and young people are protected so they get the best start in life and can realise their potential is dedicated to keeping children and young people safe from harm. The activities under this outcome seek to safeguard children and build on our Ofsted success.

5.12 Outcome 3 - People access joined-up services when they need them and feel healthier and more independent is our key outcome in relation to safeguarding vulnerable people. Key activities include projects to address childhood obesity and improve nutrition, as well as supporting greater choice and independence for those requiring adult social care.

6 COMMENTS OF THE CHIEF FINANCE OFFICER

6.1 This report sets out the delivery, performance and improvement position for the Strategic Plan at the end of quarter 3 2020/21. There are no additional financial implications arising from the recommendations of this report

7 COMMENTS OF LEGAL SERVICES

7.1 The report provides performance information. It is consistent with good administration for the council to consider performance related monitoring information. This also assists the council achieve Best Value and may demonstrate continuing improvement.

7.2 When considering its performance, 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 do not (the public sector equality duty). The council's targets are formulated by reference to its public sector equality duty and monitoring performance against those targets should help to ensure they are delivered.

Linked Reports, Appendices and Background Documents

Linked Report

- None

Appendices

- Appendix 1: Strategic delivery and performance report – quarter 3 2020/21

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

- None

Officer contact details for documents:

Juanita Haynes, Senior Intelligence and Performance Manager

Vicky Allen, Intelligence and Performance Manager

Strategic delivery and performance report Q3 review 2020-21



Our delivery and performance

The Strategic Plan is the main business planning document of the council and a central part of our Performance Management and Accountability Framework.

The strategic delivery and performance report explains our performance against the goals and targets we set in the Strategic Plan.

Our priorities and outcomes



Priority 1 - People are aspirational, independent and have equal access to opportunities

1. People access a range of education, training, and employment opportunities.
2. Children and young people are protected so they get the best start in life and can realise their potential.
3. People access joined-up services when they need them and feel healthier and more independent.
4. Residents feel they fairly share the benefits from growth and inequality is tackled.

Priority 2 - A borough that our residents are proud of and love to live in

5. People live in a borough that is clean and green.
6. People live in good quality affordable homes and well-designed neighbourhoods.
7. People feel safer in their neighbourhoods and anti-social behaviour is tackled.
8. People feel they are part of a cohesive and vibrant community.

Priority 3 - A dynamic, outcomes-based council using digital innovation and partnership working to respond to the changing needs of our borough

9. People say we are open and transparent putting residents at the heart of everything we do.
10. People say we work together across boundaries in a strong and effective partnership to achieve the best outcomes for our residents.
11. People say we continuously seek innovation and strive for excellence to embed a culture of sustainable improvement.

Our delivery and performance

Over the last quarter we have continued to respond to the pandemic, supporting residents and businesses through the second lockdown in the autumn, and through the introduction of the tiered restrictions.

These restrictions mean that we have had to change our focus and some of our services are running very differently.

Introduction



Protecting the most vulnerable and those most at risk during the pandemic is at the heart of our response. We contacted more than 8,000 shielding residents during the autumn lockdown, advising them of the support we can provide. More than 5,000 households have so far contacted us through our dedicated Covid-19 support line or online form, and we have provided advice and support to more than 15,000 individuals.

We have put in place the infrastructure needed to support the test and trace programme, opening test centres in key locations across the borough. Working with NHS and other key partners we prepared for the roll out of the vaccine to the most vulnerable, including older residents, key workers and care home residents.

Our employment and business

support services are delivering new projects to help businesses and people impacted by the pandemic adapt and develop new skills. Through the Kickstart programme we are working to secure employment opportunities with local businesses for our young people.

Covid-19 restrictions continue to have an impact on our ability to deliver many of our normal services. Where possible, we are keeping services running in line with government guidance and Covid-19 regulations.

Some services remain open remotely only, others have reduced capacity while some are closed completely. This has an impact on our strategic plan delivery and on some of our performance measures.

The national and local economies have been heavily affected by the pandemic. While we have continued to prepare residents for the

recovery when restrictions ease, together with partners our WorkPath service are continuing to deliver training and employment support for residents so they can take advantage of job opportunities that may arise during the post pandemic recovery. Affordable homes completions have slowed down due to restrictions placed on the construction industry. School attendance is lower than we would normally expect to see, as pupils and entire year groups have had to self-isolate at times. Similarly, our own staff have been affected and our sickness absence rate has been rising, meaning some of our services have been operating with reduced capacity.

We are now working closely with our partners to focus our collective efforts on supporting the local recovery.

Priority 1

People are aspirational,
independent and have equal
access to opportunities



Outstanding education and economic opportunities support people to thrive in our changing and challenging environment. We want to ensure that everyone has the best possible opportunities and life chances.

What we have delivered

We want to support our residents and businesses to thrive and survive the challenge of Covid-19. We have spent a significant amount of time revising our work programmes so that we can better support residents and local businesses who have been impacted by the pandemic.

We have provided business support to 305 small mediums enterprises (SMEs) this quarter. Seventy-three businesses received support with discretionary grant applications. Thirty-three businesses were supported to develop a home delivery or online trading service within their businesses. We had more applicants from SMEs than we were able to support through our Business Pivot Project, our digital and marketing masterclass led by experts from large organisations.

One hundred and fifty-one SMEs did not get onto the masterclass. We have also been working with our partners to explore opportunities for training SMEs and freelancers to maximise opportunities arising from the emerging green agenda - for example by retrofitting homes and other buildings making them more energy efficient.

We have been helping businesses to sign up for the Mayor of London's 'Pay It Forward' fundraising campaign, a scheme for small businesses facing hardship and challenges caused by Covid-19. Businesses were able to use the funding raised to digitise their services and help make their premises Covid-secure and adaptable for a socially distanced trading model. So far, we have helped five SMEs to secure funding and another nine are at the application stage. Recipients include a business that makes artisan

jewelry and accessories, a furniture and pottery business and the Chisenhale Dance Space.

What difference have we made

Our 'Business Pivot Project' provided 50 local small businesses with a bespoke recovery plan and support worth £1,000 as part of a pioneering new council programme aimed at helping micro and small businesses navigate the unprecedented challenge of Covid-19. This project is aimed at helping companies that are struggling in the current climate but have the potential to survive and thrive if they can get the support and advice to adapt their business model. We are now exploring the delivery of a second round of this project.

Our delivery and performance

We want our residents to be able to capitalise on new employment opportunities arising from Covid-19. We have recruited 19 Covid ambassadors to support residents and businesses so that they follow covid guidance and regulations. We have also been working with our partners at Barts NHS Trust to recruit to vacancies created to support the mass vaccination programme, enabling residents to gain valuable skills and work experience to move to permanent employment. In December we referred 273 residents for these vacancies and they are due to hear whether they have been successful at the end of January.

One of the ways that we are tackling unemployment is by delivering soft skills training, digital skills training and modern recruitment methods online to residents through online courses and workshops.

Outcome 1 People access a range of education, training and employment opportunities



Our performance

We have selected five measures to understand whether we are making progress in achieving this outcome. We have met or exceeded the target for three measures, one measure fell short of the target but exceeded our minimum expectation. Unfortunately, we did not achieve our target for one measure.

Percentage of Idea Store Learning learners who pass their course

We have moved our Idea Store courses online so that we can continue to support people in the development of their skills. 98 per cent of learners passed their course in the autumn learning term. The 90 per cent target was exceeded.

Percentage of 16-17 year in education, employment and training (EET)

94.2 per cent of young people in the borough are in education,

employment and training. We have exceeded our target of 93 per cent. More young people are now in EET than at this time last year.

Number of SMEs and new enterprises supported through the council's business programme

We have substantially increased our business support offer to help businesses adapt to the pandemic and prepare for recovery. This quarter 304 businesses in the borough participated in our enterprise support projects. The total for the year so far is 460. We exceeded our target.

Percentage of pupils attending secondary school regularly

82.5 per cent of pupils are attending secondary school regularly. We missed our target of 87 per cent. During the autumn term Covid-19 self-isolation to minimise infection of pupils meant that attendance in

many schools fluctuated and was lower than before the pandemic. We expect this to recover when vaccines are rolled out more widely.

Number of adults supported into employment by the Workpath service

The economic downturn caused by the pandemic has severely affected the number of job opportunities available. We were not able to support any residents into work this quarter. We have missed our target of 234 since the beginning of the financial year. Whilst our target for employment outcomes has not been achieved, we are continuing to deliver training and employment support to our residents to prepare them for the post-pandemic recovery.

Performance summary

Outcome 1

People access a range of education, training and employment opportunities



Outcome	Indicator Name	Outturn 2019/20	Annual Target 2020/21	Annual Minimum Expectation 2020/21	Target Q3 2020/21	Minimum expectation Q3 2020/21	Outturn Q1 2020/21	Outturn Q2 2020/21	Outturn Q3 2020/21	Last updated	Year on year trend Q3 2020/21	RAG status Q3 2020/21	Comment
ONE	Percentage of secondary pupils attending school regularly	90.4%	87.0%	82.0%	87.0%	82.0%	N/A	N/A	82.5%	Oct-20	↓	AMBER	See detail in <i>Our performance</i> section above.
ONE	Percentage of Idea Store Learning learners who pass their course	93.0%	90.0%	81.0%	90.0%	81.0%	N/A	85.0%	98.0%	Q3	N/A	GREEN	
ONE	Percentage of 16 - 17 year olds in education, employment or training	94.3%	93.0%	83.7%	93.0%	83.7%	93.3%	90.1%	94.2%	Q3	↑	GREEN	
ONE	Number of SMEs and new enterprises supported through the council's business programme	124	150	135	111	100	57	99	304	Q3	↑	GREEN	
ONE	Number of adults supported into employment by the Workpath service	504	320	225	234	211	25	51	51	Q3	↓	RED	This is a cumulative measure. See detail in <i>Our performance</i> section above.

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Our delivery and performance

High quality provision to support the learning, development and care of young children prepares them for school and their futures. We want children and young people to live in a safe environment, ensuring the best health and development outcomes.

Outcome 2

Children and young people are protected so they get the best start in life and can realise their potential



What we have delivered

We are putting children and young people at the heart of what we do so that they have the best possible life chances.

Following the easing of lockdown restrictions this quarter, we supported schools to transition back to receiving children back into the classroom environment.

Our Children's Centres continued to provide access to health services, special educational needs and family support in a socially distanced and safe way. The move to tier 4 restrictions and the subsequent national lockdown has temporarily paused this service while we seek further advice and guidance from Central Government.

We have secured funding worth £47 million from the Department for Education (DfE) that will be used to expand secondary school education provision in the borough. This

funding will go towards building a new secondary school at London Dock in Wapping and to develop a new permanent home for the secondary free school, Canary Wharf College, on the Westferry Printworks site. In addition, we are also looking into rebuilding George Green's school on the Isle of Dogs.

What difference we have made

Our arts, music and sports activities for young people provides an essential outlet for many of our more vulnerable young people. As a result of moving delivery online we have been able to reach a larger and more diverse cohort of young people. We delivered over 1,000 sessions to 200 plus young people, providing activities such as a virtual music showcase during Black History Month and a performing arts programme. In conjunction with other east London local authorities, we ran online boxing and mindfulness sessions that targeted

young carers, providing opportunities for them to take a break from their daily responsibilities and allowing them to interact with others facing similar challenges.

In recognition of our work and ongoing commitment to foster a welcoming and inclusive culture for people who are fleeing violence or persecution, our holiday childcare scheme has received an award from Sanctuary City UK. It is the first holiday scheme nationally to receive this recognition. Work towards the award has allowed the holiday childcare scheme to develop and enhance a culture that boosts inclusion and support for everyone whilst increasing children's voices and promoting active, engaged citizens under a framework that promotes British values, community cohesion and empathy.

Our delivery and performance

Outcome 2

Children and young people are protected so they get the best start in life and can realise their potential



Our performance

We have selected five measures to understand whether we are making progress in achieving this outcome. We have met or exceeded the target for two measures, two measures fell short of the target but exceeded our minimum expectation. Unfortunately, we did not achieve our target for one measure.

Long term looked after children who are in stable placements

74.4 per cent of the children who have been looked after for two and half years or more have been in the same placement for at least the last two years. We have exceeded our target of 72 per cent.

Young people engaging with the youth service who achieve a recorded outcome

31.2 per cent achieved a recorded outcome. We exceeded our target of 20 per cent.

Pupils who are regularly attending school in reception year

72.8 per cent of reception aged pupils attended school regularly (at least 90 per cent of their possible sessions). We missed our target of 73 per cent but met the minimum expectation. During the autumn term Covid-19 self-isolation to minimise infection of pupils meant that attendance in many schools fluctuated and was lower than before the pandemic. We expect this to recover when vaccines are rolled out more widely.

Percentage of pupils who are regularly attending primary school in years 1-6

81.8 per cent of primary pupils attended school regularly (at least 90 per cent of their possible sessions). We missed our target of 86 per cent but met the minimum expectation. During the autumn term Covid-19 self-isolation to

minimise infection of pupils meant that attendance in many schools fluctuated and was lower than before the pandemic. We expect this to recover when vaccines are rolled out more widely.

Families who are seeing the benefits of being supported before problems escalate

54.5 per cent of families achieved improved outcomes through the support of our Early Help services. We missed our target of 80 per cent. Limited face to face contact with families because of Covid-19 has affected performance. We have experienced issues in recording case closures of Early Help Assessments. We expect this to recover now we have rectified these technical recording issues.

Performance summary

Outcome 2

Children and young people are protected so they get the best start in life and can realise their potential



Outcome	Indicator Name	Outturn 2019/20	Annual Target 2020/21	Annual Minimum Expectation 2020/21	Target Q3 2020/21	Minimum expectation Q3 2020/21	Outturn Q1 2020/21	Outturn Q2 2020/21	Outturn Q3 2020/21	Last updated	Year on year trend Q3 2020/21	RAG status Q3 2020/21	Comment
TWO	Percentage of long-term looked after children who are in stable placements	71.6%	72.0%	65.0%	72.0%	65.0%	70.0%	74.0%	74.4%	Q3	↑	GREEN	
TWO	Percentage of families who are seeing the benefits of being supported before problems escalate	74.1%	80.0%	70.0%	80.0%	70.0%	100.0%	75.0%	54.5%	Q3	↓	RED	See detail in <i>Our performance</i> section above.
TWO	Percentage of pupils who are regularly attending school in reception year	76.5%	73.0%	65.7%	73.0%	65.7%	N/A	N/A	72.8%	Oct-20	↓	AMBER	See detail in <i>Our performance</i> section above.
TWO	Percentage of pupils who are regularly attending primary school in Years 1-6	NEW	86.0%	81.0%	86.0%	81.0%	N/A	N/A	81.7%	Oct-20	N/A	AMBER	See detail in <i>Our performance</i> section above.
TWO	Young people engaging with the youth service who achieve a recorded outcome	61.0%	20.0%	15.0%	20.0%	15.0%	N/A	21.9%	31.2%	Q3	↓	GREEN	

Outcome 3

People access joined-up services when they need them and feel healthier and more independent



We are committed to improving the health and wellbeing of our local population and the care services they receive. We are working in partnership with others to deliver joined-up person-centred services.

What we have delivered

We are focusing on keeping people as safe as possible during the Covid-19 pandemic, supporting residents to comply with the restrictions, protecting the NHS and addressing disparities and inequalities including the roll out of the vaccine programme.

We continue to work closely with our health and social care partners in the borough in response to the pandemic. We published our outbreak control plan which sets out how we will work with our partners to prevent and manage coronavirus outbreaks that may occur in the population including in care homes, schools, workplaces and faith settings.

We are continuing to join up health and care information provided to residents, making it easier to get advice and help at an early stage, including Covid-19 advice and

guidance.

We have agreed our Safe Communities community engagement strategy with health and community partners with a focus on ensuring that important information about the test and trace programme reaches all sections of our community and that all high-risk groups have easy access to testing. We have worked with partners to open test centres across the borough. We regularly publish covid-19 data so that residents and businesses are kept up to date and understand the information we are using to guide our plans and decision making.

We are working closely with our partners to ensure that the implications of the changes in restrictions introduced by the tiers system and the lockdown are understood, communicated and adhered to by residents and businesses. This included targeted

communications around enforcement in high footfall areas such as around tube stations, parks, high streets and markets.

Many of our residents are at a higher risk of contracting Covid-19 than the general population. That is why we have been working closely with resident representatives and our partners to ensure that we target our communications about Covid-19 in a way that is effective to the different communities in our borough. We have recruited 300 Covid-19 champions whose role is to support behavior change and to ensure that we are getting accurate messages about controlling the virus and vaccination myth-busting to all sectors of the community.

Our delivery and performance

Outcome 3

People access joined-up services when they need them and feel healthier and more independent



We held an evidence gathering session with residents and organisations focussing on health inequalities facing Black, Asian and minority ethnic communities. The views and experiences about how racial bias can impact on access to healthcare and health outcomes were gathered as part of wider work of our newly formed Black and Ethnic Minority Inequality Commission. Evidence from this session is contributing to our plans to advance equality, promote good relations and tackle discrimination.

What difference we have made

Since the beginning of the pandemic, we have paid over £238,000 to vulnerable residents who have had to self-isolate due to Covid-19. This means more than 475 residents on low incomes have successfully applied for the £500 support payment. The £500 payment was introduced by the government in September, to

support people on low incomes in high-risk areas, who are unable to work from home and would lose their income by self-isolating.

In October our Asthma and Wheeze Project was recognized in the prestigious annual Local Government Chronicle awards, public health category. Our Public Health service has been working with the Royal London Hospital to deliver interventions which have reduced non-elective admissions to hospital of children and young people with asthma. We provided information clinics for children at risk of asthma and specialist training on asthma and wheeze interventions for healthcare professionals. As a result of these interventions parents and children have reported improved confidence in managing their condition. There has been a significant reduction in non-elective admissions to hospital from the children who took part in this project.

Our performance

We have selected three measures to understand whether we are making progress in achieving this outcome. We have not met the target for one measure. We do not have a result for the remaining two measures in this outcome as they are related to our annual residents' survey which will not be conducted until early 2021.

People who are more independent after being supported through reablement service

52.5 per cent of our clients who needed our services after leaving hospital or following a fall or spell of illness were supported through our reablement service to be more independent for longer and did not require any further support within the year. We did not meet our target of 80 per cent. Our reablement services normally achieve good and sustainable outcomes for residents, increasing their independence.

However, this quarter, due to the increase in hospital discharges during the second wave of the pandemic, there has been a significant increase in the number of people receiving reablement services. At the end of the quarter there were 76 people in receipt of reablement services compared to 47 at the end of the previous quarter. The impact of Covid-19 meant that we had to reduce the time for reablement from around 6 weeks to 3 weeks. We have also experienced a steep increase in the number of short-term home care clients.

Performance summary

Outcome 3

People access joined-up services when they need them and feel healthier and more independent



Outcome	Indicator Name	Outturn 2019/20	Annual Target 2020/21	Annual Minimum Expectation 2020/21	Target Q3 2020/21	Minimum expectation Q3 2020/21	Outturn Q1 2020/21	Outturn Q2 2020/21	Outturn Q3 2020/21	Last updated	Year on year trend Q3 2020/21	RAG status Q3 2020/21	Comment
THREE	People who are more independent after being supported through reablement services	75.5%	80.0%	72.0%	80.0%	72.0%	75.0%	84.2%	52.5%	Q3	↓	RED	See detail in <i>Our performance</i> section above.
THREE	Residents' self-reported level of physical activity	N/A	31.88%	26.12%	31.88%	26.12%	N/A	N/A	N/A	2018/19	N/A	N/A	The 2020/21 Annual Residents' Survey fieldwork will start in early in 2021 with results reported in the final quarter of the year.
THREE	Residents' self-reported level of health	N/A	79.48%	74.52%	79.48%	74.52%	N/A	N/A	N/A	2018/19	N/A	N/A	The 2020/21 Annual Residents' Survey fieldwork will start in early in 2021 with results reported in the final quarter of the year.

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We cannot deny that this is a borough of contradictions. We are supporting residents to access the economic opportunities by tackling inequalities in employment, health and housing.

What we have delivered

We are committed to creating cohesive communities that are strong, fair, and equal. The Tower Hamlets Black, Asian and Minority Ethnic (BAME) Inequalities Commission was set up as a response to the Black Lives Matter movement to help us to address inequalities faced by our BAME communities. In November we held four formal public meetings to hear from residents about their lived experiences of inequality and identify tangible and practical actions which will deliver real change in the areas of community leadership, health, education, and employment. With our partners we are producing a plan which we will officially launch in 2021, setting out actions which we hope will deliver real change.

With our partners we are delivering a range of advice and guidance on

maximizing income on benefits. So far this year we have supported 19 households to receive payments from our discretionary housing fund totaling £59,000. We have helped 86 families to apply for Universal Credit amounting to an annual award of £879,429. Latest available data shows that between July and September 5,250 clients received benefit support through our Local Community Funded social welfare advice services. Of those assisted, 977 achieved an increase in income and the total amount of increased and or backdated achieved was over £4.9 million.

In November we agreed a grant of £100,000 to support the Tower Hamlets Credit Union and other initiatives to increase access to fair finance including the un-banked, under-banked and small businesses.

What difference we have made

Since the beginning of the year we have worked with over 2,600 households who have been assessed by our housing options service as being owed a prevention or relief of homelessness duty. This work includes employing tenancy support officers to help households at risk of homeless to broker more constructive relationships with their landlords in the private or social housing sector. We are reporting Q2 data which is our most recent audited data as published by the Ministry of Housing, Communities and Local Government (MHCLG). However, our provisional service data shows that between April and December we have prevented over 600 households from becoming homeless.

Our delivery and performance

Since the start of the pandemic, our Tackling Poverty team has provided **food provisions** to support residents in poverty. To date we have processed 4,952 referrals to food banks and voluntary and community sector organisations supporting residents experiencing food poverty.

Our performance

We have selected nine measures to understand whether we are making progress in achieving this outcome. We exceeded our target for three measures. We exceeded the minimum expectation for one measure. Unfortunately, we did not achieve our target for two measures. We do not have a result for the remaining three measures in this outcome as they are related to our annual residents' survey which will not be conducted until early 2021.

Outcome 4 Residents feel they fairly share the benefits from growth and inequality is tackled



Proportion of women, residents from deprived postcodes, residents from ethnic minority backgrounds, and residents who are disabled supported into employment by the Workpath service

While we have not been able to help as many people into jobs this year as we have wanted to because of the economic downturn caused by the pandemic, we have continued to target those groups most likely out of work. We have achieved our targets for women and for residents in deprived postcodes. We met the minimum expectation for supporting residents from black, Asian and minority ethnic groups into work. Unfortunately, we did not meet our target to support disabled residents into work. We are rapidly changing our service offer to focus on the pandemic recovery.

Households prevented from becoming homeless

The latest published data is for Q2. 55.5 per cent of households who approached us with the threat of homeless had their homelessness prevented or relieved. Our target of 26 per cent was exceeded. This equates to 272 preventions this quarter (413 so far this year).

Resident Universal Credit application support

Between October and December, we supported 18 residents with their Universal Credit application; the total supported so far this year is 86. We missed our target. We are working with our partners to increase the number of residents they refer to our services. We have recruited an outreach officer whose job will be to raise awareness of our offer to communities in the borough.

Average annual income increase for residents receiving benefit maximization support

Between October and December 2020, the average annual increase in benefits achieved for residents who were supported to maximise their income on benefits (including backdated appeals and new benefits) was £5,003.00. We did not achieve the target of £6,212.20. Covid-19 has meant that face to face services have been suspended. We are offering phone and online support however this has affected the numbers of clients accessing our services.

Outcome 4
Residents feel they fairly share the benefits from growth and inequality is tackled



Outcome	Indicator Name	Outturn 2019/20	Annual Target 2020/21	Annual Minimum Expectation 2020/21	Target Q3 2020/21	Minimum expectation Q3 2020/21	Outturn Q1 2020/21	Outturn Q2 2020/21	Outturn Q3 2020/21	Last updated	Year on year trend Q3 2020/21	RAG status Q3 2020/21	Comment
FOUR	Women who are supported into employment by the Workpath service	250	45.0%	41.0%	45.0%	41.0%	48.0%	64.7%	64.7%	Q3	N/A	GREEN	See detail in <i>Our performance</i> section above.
FOUR	Residents from BAME backgrounds supported into employment by the Workpath service	439	85.0%	77.0%	85.0%	77.0%	76.0%	82.4%	82.4%	Q3	N/A	AMBER	See detail in <i>Our performance</i> section above.
FOUR	Residents who have disabilities supported into employment by the Workpath service	91	15.0%	14.0%	15.0%	14.0%	8.0%	13.7%	13.7%	Q3	N/A	RED	See detail in <i>Our performance</i> section above.
FOUR	Residents who come from deprived postcodes supported into employment by the Workpath service	424	70.0%	63.0%	70.0%	63.0%	80.0%	76.5%	76.5%	Q3	N/A	GREEN	See detail in <i>Our performance</i> section above.
FOUR	Residents' self-reported level of health for groups experiencing health inequalities - BAME residents	N/A	79.4%	74.4%	79.4%	74.4%	N/A	N/A	N/A	2018/19	N/A	N/A	The 2020/21 Annual Residents' Survey fieldwork will start in early in 2021 with results reported in the final quarter of the year.
FOUR	Residents' self-reported level of health for groups experiencing health inequalities - residents from C2, D, E socio-economic groups	N/A	71.1%	65.6%	71.1%	65.6%	N/A	N/A	N/A	2018/19	N/A	N/A	The 2020/21 Annual Residents' Survey fieldwork will start in early in 2021 with results reported in the final quarter of the year.

Outcome 4
Residents feel they fairly share the benefits from growth and inequality is tackled



Outcome	Indicator Name	Outturn 2019/20	Annual Target 2020/21	Annual Minimum Expectation 2020/21	Target Q3 2020/21	Minimum expectation Q3 2020/21	Outturn Q1 2020/21	Outturn Q2 2020/21	Outturn Q3 2020/21	Last updated	Year on year trend Q3 2020/21	RAG status Q3 2020/21	Comment
FOUR	Average annual income increase for residents receiving benefit maximisation support	N/A	£6,216.20	£5,594.58	£6,216.20	£5,594.58	£6,249.05	£5,050.20	£5,003.00	Q3	N/A	RED	See detail in <i>Our performance</i> section above.
FOUR	Households prevented from becoming homeless	14.08%	26.0%	21.8%	26.0%	21.8%	26.6%	55.5%	N/A	Q2	↑	GREEN	The most recent data is for Q2. There is a significant reporting time lag on official data being released.
FOUR	Resident Universal Credit application support	N/A	250	225	118	106	44	68	86	Q3	N/A	RED	This is a cumulative measure. See detail in <i>Our performance</i> section above.

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Priority 2

A borough that our residents
are proud of and love to live in



We need to manage and reduce air pollution, carbon emissions, and the levels of waste produced by a growing population. We are working with our communities to change behaviours and protect our environment.

What we have delivered

We are progressing with our programme of improvements to the local environment including works that will help us to achieve our commitment to become a net zero carbon emissions borough by 2025.

Together with Transport for London we have funded a new acoustic barrier fitted along the A12, next to Bromley-by-Bow station. The new barrier aims to reduce the level of excessive traffic noise emanating from the A12 and improve the quality of life of local people including those walking and cycling in the local area. If this scheme is successful it could be rolled out elsewhere in Tower Hamlets.

We are continuing to roll out electric vehicle charging points and our aim is to have installed 250 by 2022. So far, we have installed 80

slow charge points and one rapid charge point.

In addition, we have been awarded £100,000 of funding to deliver 182 new electric vehicle on-street charge points around the borough with the first 82 of those being installed in early 2021. These charge points will allow motorists to refuel and reduce their emissions while making quieter, less polluting journeys.

We have been delivering round two of our energy improvement grants programme for small and medium enterprises. We made £500,000 available to SMEs who will receive a maximum grant of 50 per cent of the costs, up to £5,000, to carry out carbon reduction projects on their premises. For schools we have recently awarded 8 schools grants of up to £30,000 to carry out energy retrofits to improve their buildings.

We are committed to creating a sustainable environment and to maximizing biodiversity. Research shows that green roofs can provide a boost to the amount of solar energy gained on a green roof. We are working on designs for installing bio-solar green roofs on to some of our Tower Hamlets Homes housing stock early in the new year.

Our annual programme of street tree planting is putting us on track to deliver the Mayoral pledge to plant 1,000 street trees on public highways by 2022.

Our delivery and performance

Outcome 5 People live in a borough that is clean and green



We are rolling out our ‘flats recycling package’ to Tower Hamlets Homes estates. We are aiming to achieve our target of 35-40 estates to be completed by the end March 2021. We are continuing to promote home composting and community composting. We are developing a webpage for housing providers to disseminate information and communications tools to tenants and leaseholders.

What difference we have made

We are making it easier, safer and more convenient to get around the by bike, public transport and on foot by implementing a Liveable Streets programme in the borough. We recently approved a liveable street scheme in Bow. The scheme will include traffic calming measures on key roads, improvements to walking and cycling routes and

improvements to public open spaces. Over 3,800 people responded to the recent consultation on our proposals which were shaped by 18 months of community engagement. We have started construction of the Bethnal Green Liveable Street which is expected to be completed in January. Construction has also started on the Wapping and Barkantine Liveable Streets. These improvements will include eight school streets and aim to tackle unhealthy levels of air pollution and improve pedestrians’ safety. Construction was completed for nine School Streets (Arnhem Wharf, Bigland, Clara Grant, Culloden, Elizabeth Selby, Lawdale, Seven Mills, St Peters, and Virginia schools) protecting a further 3,431 primary and nursery aged children.

Our parks and open spaces play a vital role as a place to meet friends and family and participate in sports

and recreation activities in a socially distanced and safe way. For the seventh year in a row Victoria Park was recognised as one of the ten most popular parks in the country, winning a Green Flag People’s Choice award. Eleven other parks and open spaces in the borough also retained the prestigious Green Flag award. Victoria Park was also awarded Gold in the ‘Heritage Park Awards’ and Gold in Large Park category in the London in Bloom awards.

We are continuing to make improvements to outdoor play equipment in our parks as a part of a £10 million parks investment programme which will improve over 60 of our parks and open spaces. We have recently installed exciting new inclusive playground equipment in Bartlett Park and in Meath Gardens. We have also completed improvement works to Helling Street and Wapping Gardens playgrounds

and we have opened tennis courts at Ropemakers Fields. at Ropemakers Fields.

Our delivery and performance

Outcome 5 People live in a borough that is clean and green



Our performance

We have selected five measures to understand whether we are making progress in achieving this outcome. We have met or exceeded the target of one of these measures. One measure fell short of the target but exceeded our minimum expectation. Unfortunately, we did not achieve our target for one measure. For the remaining measures there is no planned outturn for this quarter or there is a delay in national data being released due to the pandemic.

Primary school pupils benefitting from a school street at their school
This quarter we continued our work to make it easier for people to walk and cycle while socially distancing. We completed school streets at a further nine primary schools and nurseries, benefitting 3,431 pupils. This adds to the seven school streets completed in Q2 and brings the total

number of pupils benefitting from school streets to 5,610 equating to 21.8 per cent of primary school children in the borough. Our Q3 target of 6.9 per cent was exceeded and we have already met our target for the full year.

Level of household recycling
19.9 per cent of household waste was recycled in Q2 (latest data). We missed our target of 22 per cent but exceeded our minimum expectation. We are re-designing our service in order to improve our recycling rates. We are also continuing to communicate the importance of recycling to residents and landlords to try and drive behaviour change.

Level of public realm cleanliness
This quarter 79.6 per cent of our streets and public realm met or exceeded the national cleanliness standard. We missed our target of 95 per cent. The level of cleanliness

has been deteriorating since lockdown measures were eased. In addition, there has been a high volume of litter in our parks and open spaces which are experiencing high use. We are introducing new technology to help us identify hotspots and target our resources to those areas more quickly.

Performance summary

Outcome 5 People live in a borough that is clean and green



Outcome	Indicator Name	Outturn 2019/20	Annual Target 2020/21	Annual Minimum Expectation 2020/21	Target Q3 2020/21	Minimum expectation Q3 2020/21	Outturn Q1 2020/21	Outturn Q2 2020/21	Outturn Q3 2020/21	Last updated	Year on year trend Q3 2020/21	RAG status Q3 2020/21	Comment
FIVE	Level of public realm cleanliness (litter)	96.96%	95.0%	85.5%	95.0%	85.5%	99.2%	85.42%	79.6%	Q3	↓	RED	See detail in <i>Our performance</i> section above.
FIVE	Level of household recycling (quarterly audited)	21.5%	22.0%	19.8%	22.0%	19.8%	17.4%	19.9%	N/A	Q2	↓	AMBER	The most recent data is for Q2. There is a significant reporting time lag on official recycling data due to the pandemic.
FIVE	Level of CO2 emissions generated by the council's activities	64.0%	26.0%	23.4%	26.0%	23.4%	N/A	N/A	N/A	2019/20	N/A	N/A	This is an annual measure and we will report after the final quarter of this year.
FIVE	Primary school pupils benefiting from a school street at their school (traffic reduction outside the school)	1.4%	9.4%	8.5%	6.9%	6.2%	0.0%	8.5%	21.8%	Q3	-	GREEN	
FIVE	Percentage of population that benefits from liveable streets projects	N/A	13.6%	12.2%	0%	0%	0%	0%	0%	Q3	-	N/A	This measure will only be reported when Liveable Streets projects have been fully implemented in specific areas. Construction is currently underway.

Our delivery and performance

People find accessing good quality, affordable housing difficult in a borough with a fast-growing population, low-income levels for many, and a growing private rented sector with high rents and house prices.

Outcome 6 People live in good quality affordable homes and well-designed neighbourhoods



What we have delivered

Tower Hamlets has the highest housing target in the current London Plan and a limited amount of land available for new development. In December our Cabinet officially adopted our high density living supplementary planning guidance on the design of high density residential and mixed-use development as set out in our new Local Plan. In November and December we held preliminary online workshops to help us develop a new Supplementary Planning Document (SPD) to guide and influence the design and planning of tall buildings across the borough. Further workshops to refine policy ideas are scheduled for January and February with formal consultation due in May 2021.

We are continuing to make progress towards the Mayoral pledge to have 2,000 new council homes in delivery by 2022. 53 new family council homes were completed in Baroness Road, E2 and in Rhodeswell Road in E14. Both sites were previously underused car parks. Three homes will be for disabled residents. Twenty-five per cent of properties in these new developments will go to residents who are on our housing register and already living on these estates. In addition, we have recently granted planning permission to build a further 42 much needed council homes on the Southern Grove site in Bow, part of a larger 78 home development which will protect the future of the Victorian workhouse that sits on the site. We have also been consulting on where our council homes should be built, including on infill sites. We are currently consulting on proposals for the Clichy Estate:

Harriot, Apsley and Pattison Houses and Ashington House.

We recently submitted a planning application for a new wheelchair accessible foot bridge at South Dock on the Isle of Dogs. The bridge will link new development at South Quay with Canary Wharf and Wood Wharf. Designed to accommodate projected pedestrian flows well into the future, it will shorten walking times to the new Crossrail station and other public transport links, as well as improving access to jobs, retail and other town centre services at Canary Wharf. Construction is due to begin in 2021.

Our delivery and performance

Outcome 6 People live in good quality affordable homes and well-designed neighbourhoods



We are continuing to deliver our programme of estate fire safety improvement initiatives. We recently responded to the Home Office fire safety consultation about the Grenfell Tower fire inquiry report recommendations that require a change in law to place new requirements on building owners or managers of multi-occupied residential high-rise buildings.

What difference we have made

Since the start of the financial year we have moved 287 families out of temporary accommodation and into permanent family sized social housing of two or more bedrooms. 83 of those households moved into permanent accommodation were previously classified as homeless. We achieved this by working with landlords to enable social distanced or virtual viewings.

Through our choice-based lettings

system, we have let social housing to 524 households since March 2020, with 293 of those lets being to households with the most severe housing needs and categorised as being overcrowded.

Our performance

We have selected five measures to understand whether we are making progress in achieving this outcome. We have met or exceed the target for two of these measures. Unfortunately, we did not achieve our target for two measures. One measure in this outcome is related to our annual residents' survey which will not be conducted until early 2021.

Lets to overcrowded households
70.5 per cent of lets to in the quarter were to overcrowded households on the common housing register. The target was exceeded. This percentage represents lets for

146 families of the 207 total lets for this quarter to applicants on the housing register.

Homeless households moved into permanent social housing
31.9 per cent of lets this quarter were made to homeless households receiving permanent offers of accommodation of two or more bedrooms. The target was exceeded. This percentage represents permanent homes for 38 families of the 219 total lets of two or more-bedroom homes for this quarter.

Level of affordable homes permitted (by habitable room)
33.9 per cent of homes granted planning permission (where affordable housing policies would apply) were classed as affordable. This equates to 388 new homes. We narrowly missed our minimum expectation target of 35 per cent. Most individual permissions counted

for this measure have secured 35 per cent, or above, on site. However, the total has been skewed due to the inclusion of two minor amendment applications to permissions granted on appeal and which were therefore not decided by the council. These permissions only achieved 6% and 9% affordable housing in the original appeal decisions, but through our negotiations the proportion of affordable housing has increased from 6% to 9% on one of these decisions. Performance is based on 1,176 habitable rooms permitted since the beginning of the year.

Our delivery and performance

Level of affordable homes completed (by habitable room)
34.3 per cent of homes completed (measured by habitable rooms, on sites where affordable housing policies would apply) were classified as affordable. This equates to 487 new affordable homes in Tower Hamlets. We narrowly missed our minimum expectation of 35 per cent. Completions will have been affected by a pause in construction activity during the early part of the national lockdown in spring 2020. Performance is based on 1,915 habitable rooms completed since the beginning of the year.

Outcome 6 People live in good quality affordable homes and well-designed neighbourhoods



Outcome 6
 People live in good quality affordable homes and well-designed neighbourhoods



Outcome	Indicator Name	Outturn 2019/20	Annual Target 2020/21	Annual Minimum Expectation 2020/21	Target Q3 2020/21	Minimum expectation Q3 2020/21	Outturn Q1 2020/21	Outturn Q2 2020/21	Outturn Q3 2020/21	Last updated	Year on year trend Q3 2020/21	RAG status Q3 2020/21	Comment
SIX	Lets to overcrowded households	1,078	50%	45%	50%	45%	46.0%	46.5%	70.5%	Q3	↑	GREEN	
SIX	Homeless households moved into permanent social housing	27.4%	30.0%	27.0%	30.0%	27.0%	30.0%	26.1%	31.9%	Q3	↑	GREEN	
SIX	Level of affordable homes permitted (by habitable room)	31.4%	50.0%	35.0%	50.0%	35.0%	27.2%	28.2%	33.9%	Q3	-	RED	See detail in <i>Our performance</i> section above.
SIX	Level of affordable homes completed (by habitable room)	24.53%	50.0%	35.0%	50.0%	35.0%	100%	73.4%	34.3%	Q3	↓	RED	See detail in <i>Our performance</i> section above.
SIX	Residents' satisfaction with the local area as a place to live	N/A	72.2%	67.8%	72.2%	67.8%	N/A	N/A	N/A	2018/19	N/A	N/A	The 2020/21 Annual Residents' Survey fieldwork will start in early in 2021 with results reported in the final quarter of the year.

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Our delivery and performance

Tower Hamlets is a vibrant, diverse and exciting place. We want everyone to feel safe and enjoy all that it has to offer. We are working with residents and the police to tackle the linked issues of violence, anti-social behavior, and drugs and alcohol.

Outcome 7

People feel safer in their neighbourhoods and anti-social behaviour is tackled



What we have delivered

Crime and anti-social behaviour have a major impact on residents' sense of wellbeing. We held a public consultation to help us identify community safety priorities for our new community safety partnership plan. The new plan is expected to be finalised in the spring.

We are tackling the increase in ASB reports driven by concern over lack of adherence to social distancing rules by deploying our police and council resources across the borough to help residents understand and follow the Covid-19 guidance and keep themselves and the community safe.

We have renewed the borough-wide responsible drinking Public Spaces Protection Order until October 2023. We are also taking action to tackle chaotic individuals who are persistent and prolific ASB offenders

and who cause a detrimental effect on the quality of life for the majority of the community. We are consulting on proposals to introduce a Public Spaces Protection Order (PSPO) in the borough, to tackle the issue of antisocial behavior linked to the recreational use of the psychoactive substance, nitrous oxide.

With our partners in THCVS and the voluntary and community sector we are facilitating a bid to the GLA's Violence Reduction Unit for funding to establish a *MyEnds* community connectors programme on the Isle of Dogs. If successful, this funding will support locally designed interventions in neighbourhoods affected by high and sustained levels of violence and will support young people facing multiple or complex disadvantage. Our third sector Consortium partners are all specialists in transforming the life

trajectories of young people who have become marginalised by severe poverty, unemployment and crime - particularly those from BAME communities who are disproportionately affected by these issues.

What difference we have made

We are tackling serious violence by continuing to provide personalised support for victims of knife crime. So far, our violent crime reduction service has trained 47 medical staff at the Royal London Hospital. We have engaged with 312 survivors of violence, providing practical support that will help them to rebuild their lives.

Our delivery and performance

Outcome 7 People feel safer in their neighbourhoods and anti-social behaviour is tackled



Through our ‘breaking the cycle of youth violence’ prevention programme we supported 10 young people to make positive decisions that will see a reduction in the numbers young offenders entering the youth justice system. The ‘Evolve’ programme is aimed at children and young people who are at risk of becoming involved in offending behavior whilst giving their families strategies to help them to make positive life choices. Workshops include drug and alcohol awareness, knife crime awareness, healthy relationships, social media, victim awareness and mentoring. Our next programme begins in the new year.

Our performance

We have selected five measures to understand whether we are making progress in achieving this outcome.

We have met or exceeded the target for one measure. One measure fell short of the target but exceeded our minimum expectation. Unfortunately, one measure fell short of the target. Two measures in this outcome are related to our annual residents’ survey which will not be conducted until early 2021.

Victims of violence against women and girls who feel safer after engaging with victim support
We understand the impact that violence has on people. Providing professional specialist emotional support and practical problem-solving solutions helps victims get back on track with their lives. This quarter we surveyed 49 women and girls who received support from our commissioned victim support services, and all (100 per cent) reported that they felt safer because of the support we provided. We exceeded our target of 86 per cent.

Young people entering the youth justice system for the first time
The Youth Justice Service (YJS) measures performance by looking at the rate of young people per hundred thousand in the relevant age group. 107 young people entered the youth justice system for the first time equating to a rate of 365.2. The target for the YJS was 350. This was due to increased policing activity during the reporting period. To address this slight increase and deliver a reduced rate of first entrants to the youth justice system, a First Time Entrant Action Plan has been developed which includes a focus on developing the preventative work with Early Help and third sector community organisations. This has already commenced and aiming to realise a reduction of the rate to meet the current target of 350 by end of March 2021.

Drug users (opiate users) successfully completing treatment
42 opiate users left our drug treatment service successfully free of drug dependence and did not return within six months. This achievement equates to a rate of 3.51 per cent of all clients in drug treatment. We have not met our target of 5.5 per cent. We have recently commissioned a new treatment provider and are working with them to improve successful treatment rates. Covid-19 presents a risk to staying drug free and it is not appropriate to rush the discharge of treatment which will remove support networks meaning more people are staying in treatment longer.

Outcome 7
 People feel safer in their neighbourhoods and anti-social behaviour is tackled



Outcome	Indicator Name	Outturn 2019/20	Annual Target 2020/21	Annual Minimum Expectation 2020/21	Target Q3 2020/21	Minimum expectation Q3 2020/21	Outturn Q1 2020/21	Outturn Q2 2020/21	Outturn Q3 2020/21	Last updated	Year on year trend Q3 2020/21	RAG status Q3 2020/21	Comment
SEVEN	Residents' concern about crime and anti-social behaviour	N/A	45.1%	50.9%	45.1%	50.9%	N/A	N/A	N/A	2018/19	N/A	N/A	The 2020/21 Annual Residents' Survey will be conducted early in 2021 with results reported in the final quarter of the year.
SEVEN	Young people entering the youth justice system for the first time	351.1	350	385	350	385	379.4	404.3	365.2	Q3	↑	AMBER	Data covers the period April 2019 to March 2020 and was released during Q3. See detail in <i>Our performance</i> section above.
SEVEN	Residents' feeling of safety in their local area	N/A	88.0%	84.0%	88.0%	84.0%	N/A	N/A	N/A	2018/19	N/A	N/A	The 2020/21 Annual Residents' Survey will be conducted early in 2021 with results reported in the final quarter of the year.
SEVEN	Drug users (opiate users) successfully completing treatment	6.5%	5.5%	5.0%	5.5%	5.0%	5.3%	4.3%	3.5%	Q3	↓	RED	See detail in <i>Our performance</i> section above.
SEVEN	Victims of violence against women and girls or hate crime who feel safer after engaging with victim support	97.0%	86.6%	77.4%	86.6%	77.4%	100.0%	100.0%	100.0%	Q3	→	GREEN	



We are one of the most vibrant and diverse communities in the UK. Local people are proud of how our many communities work together and they value the rich cultural offer that comes with this mix of influences.

What we have delivered

We have adopted a new Voluntary and Community Sector Strategy. This partnership document identifies how we will work together with our partners to achieve positive outcomes for residents, particularly their role in the recovery process for Covid-19 and the post-pandemic world. The voluntary and community sector has made a significant contribution to the response to the pandemic in Tower Hamlets providing services to housebound, socially excluded and vulnerable residents. The VCS Strategy aims to build upon the good practices already developed by the voluntary and community sector, particularly during the pandemic, and to support the VCS to provide services that are fully responsive to local residents' needs going forward.

Since the start of the pandemic more than 2,300 people have signed

up as volunteers through our Volunteer Hub, providing vital support to residents who are socially isolated and shielding. Volunteer roles include driving personal protective equipment to care homes, delivering shopping to housebound residents, helping in community kitchens and distributing food supplies to voluntary and community sector organisations. We are providing this support through the new public health Covid-19 grant provided by the government. This funding is also supporting the services delivered by the Volunteer Centre Tower Hamlets.

We developed and produced an online Black History Month programme working with five local arts and community organisations to develop new work. This included an online photography exhibition. We hosted a season of Bangla drama consisting of pre-recorded plays and

readings accompanied by live, interactive question and answer sessions. The annual drama festival showcased local writing and talent, as well as putting the spotlight on a range of issues relevant to the British-Bengali experience. It featured 10 plays from east London as well as West Bengal, India and Sylhet Bangladesh. Our Idea Stores and Local History Library and Archives hosted several talks and presentations. We also supported a variety of virtual or socially distanced events organised by arts and voluntary groups in the borough. These included cinema, performances, cookery discussions and workshops.

Our delivery and performance

Outcome 8 People feel they are part of a cohesive and vibrant community



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What difference we have made

Our Welcome to Tower Hamlets programme offers migrants new to the borough the opportunity to improve English language skills through ESOL courses and conversation clubs. It also offers participants opportunities for volunteering with the aim of both helping participating migrant residents to become job ready as well as enabling them to feel part of the community. In the first year of this pilot project the following successes have been achieved:

- 285 migrants attended accredited courses
- 1,225 volunteering hours, including vocational training
- 254 migrants attended conversation clubs
- 90 per cent of participants demonstrated an improvement in their English language skills
- Over 85 per cent of participants

felt part of the community and were more confident and more independent

We have been working with various faith leaders and representatives in the borough to ensure that communities can practice their worship in a safe way. We have held training sessions with the Tower Hamlets Interfaith Forum on infection prevention and outbreak control. We have received positive feedback about the impact of our training programme. Faith leaders now feel equipped with the information they need to respond if notified of a positive test linked to their building. We have supported faith leaders to develop video messages to help counter misinformation which may deter take up of the vaccination and have encouraged them to become Covid Community Champions. We have also commissioned a provider to

distribute infection prevention supplies such as sanitiser, signs, and face coverings to faith settings across the borough.

Our performance

We have selected five measures to understand whether we are making progress in achieving this outcome. We have met or exceeded the target for one measure. We have not set a target for one measure. Three measures in this outcome are related to our annual residents' survey which will not be conducted until early 2021.

Percentage of Idea Store Learners who pass their English Speakers of Other Languages (ESOL) course
97 per cent of learners passed their ESOL course in the Autumn learning term. The target of 75 per cent was

exceeded.

Level of hate crime

1,100 offences of hate were reported to the Police in the rolling 12 months to December 2020. Hate crime includes disability, faith, homophobic, racist and transgender hate crimes. We do not set a target for this contextual measure.



Outcome	Indicator Name	Outturn 2019/20	Annual Target 2020/21	Annual Minimum Expectation 2020/21	Target Q3 2020/21	Minimum expectation Q3 2020/21	Outturn Q1 2020/21	Outturn Q2 2020/21	Outturn Q3 2020/21	Last updated	Year on year trend Q3 2020/21	RAG status Q3 2020/21	Comment
EIGHT	Level of hate crime	879	N/A	N/A	N/A	N/A	934	1,022	1,100	Q3	N/A	N/A	This is a contextual measure. We do not set targets.
EIGHT	Residents' level of volunteering	N/A	23.4%	16.6%	23.4%	16.6%	N/A	N/A	N/A	2018/19	N/A	N/A	The 2020/21 Annual Residents' Survey fieldwork will start in early in 2021 with results reported in the final quarter of the year.
EIGHT	Residents' perception of people from different backgrounds getting on well	N/A	80.4%	75.6%	80.4%	75.6%	N/A	N/A	N/A	2018/19	N/A	N/A	The 2020/21 Annual Residents' Survey fieldwork will start in early in 2021 with results reported in the final quarter of the year.
EIGHT	Percentage of Idea Store learners who pass their English for Speakers of Other Languages (ESOL) course	76.0%	75.0%	67.5%	75.0%	67.5%	N/A	93.0%	97.0%	Q3	N/A	GREEN	
EIGHT	Proportion of residents who have friends from other ethnic backgrounds	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	The 2020/21 Annual Residents' Survey fieldwork will start in early in 2021 with results reported in the final quarter of the year.

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Priority 3

A dynamic, outcomes-based council using digital innovation and partnership working to respond to the changing needs of our borough

Our delivery and performance

Outcomes 9-11



The three enabling outcomes in Priority 3 are designed to support us to deliver outcomes 1-8 in a modern, collaborative and innovative way that makes the most of limited resources.

Outcome 9 - People say we are open and transparent putting residents at the heart of everything we do

Everyone who lives, works, studies, visits or does business in Tower Hamlets will use a council service in some form. We work with our residents to improve our services and design them around people.

Outcome 10 - People say we work together across boundaries in a strong and effective partnership to achieve the best outcomes for our residents

Making change happen is easier when we work together with others. The Tower Hamlets Partnership brings together the public, private, voluntary and community sectors to improve the lives of our residents.

Outcome 11 - People say we continuously seek innovation and strive for excellence to embed a culture of sustainable improvement

Our improvement journey has seen us take huge strides forward. We will build on our successes, reflect on where we could have done better, and we have put in place the building blocks to improve continuously.

Our delivery and performance

Outcomes 9-11



What we have delivered

We have been working with partners to mitigate the impact of Brexit on residents and local businesses.

In conjunction with Queen Mary University of London we are hosting a roundtable to discuss the immediate aftermath of Brexit and what the obstacles are to continue business as usual. The information gathered in this session will help us to create Brexit themed support for small and medium enterprises in the borough.

We have been preparing for the upcoming **Census** in March 2021 which this year the Office for National Statistics (ONS) will be delivering online by default.

We are working closely with ONS to ensure they have the intelligence they need to support planning and preparation for the census. Completion of the census form is

critical and the data collected will help to determine funding of local services. We will also reach out to residents and our partners to promote the Census, to raise awareness of the resources and support available for residents to complete their census return.

What difference we have made

We work in collaboration with partners in the NHS to deliver the Better Care Fund programme of joining up health and care services. To meet the target set by the Better Care Fund, we are ensuring that there are fewer than 8 permanent admissions per month to residential or long-term nursing care. We are achieving this by providing support and equipment to enable people to stay at home or in the community (for example sheltered or extra care housing) so that they can continue to live independently for longer.

Our performance

We have selected fourteen measures to understand whether we are making progress in achieving these outcomes. Two measures exceeded the target while two measures fell short of the target but exceeded our minimum expectation.

Unfortunately, we did not achieve our target for three measures. Six measures in this outcome are related to our annual residents' survey which will not be conducted until early 2021. Unfortunately, data for one indicator normally collected by colleagues in the NHS is not available because of the pandemic.

Long-term support needs met by admission to residential and nursing care homes

The rate of residents aged 65+ whose long terms needs are met by admission to residential and nursing care homes per 100,000 population is 182.20. The target of 337.5 has been met (a lower number is

better).

Media and press view of the council
91.2 per cent of press and media coverage of the council has been positive or neutral. This exceeds our target of 80 per cent.

User satisfaction with council's online service offer
This quarter 47.6 per cent of customers reported that they were satisfied with the online customer experience. We did not meet our target but exceeded the minimum expectation. In November we experienced difficulties with one of our transactions and this led to lower satisfaction. We are working on strengthening the user experience and will be rolling out satisfaction surveys to more transactions.

Our delivery and performance

Outcomes 9-11



Council staff turnover rate

10.58% of staff left the organisation over the last 12 months. Performance fell short of our 9 per cent target but exceeded our minimum expectation. There have been a number of organisational changes and reviews resulting in voluntary departures from the organisation. We expect turnover to fluctuate while we go through a period of organisational transformation.

Council sickness absence

The average number of sickness absence days per full time equivalent employee over the past 12 months was 12.34 days. Like many organisations, we have seen a significant rise in absence associated with Covid-19. We are monitoring our underlying absence level without Covid-19 and these continue to show a better picture. Our target of 8

days was missed. At this challenging time we are supporting the health and wellbeing of our workforce through a number of mechanisms, including mental health first aiders and an employee assistance programme.

Number of adults supported into employment by the Workpath partnership

The economic downturn caused by the pandemic has severely affected the number of job opportunities available. Together with our partners we were not able to support as many residents into work this quarter as we had planned. We have missed our target of 300 since the beginning of the financial year. As a partnership, we are continuing to deliver training and employment support to our residents to prepare them for the post-pandemic recovery.

Budget variance for the general fund

We are currently projecting an overspend of £2.9m. This exceeds our target. Our Budget Monitoring Report 2020-21 Period 9 sets out in detail the actions we are taking to manage our financial resources.

Children and young people receiving support from mental health services

Mental health services for children and young people are commissioned by the council but delivered by colleagues in the NHS. During the pandemic, NHS resources have been focused on maintaining service and reduced reporting on many services. We are therefore unable to report on this measure now.



Outcome	Indicator Name	Outturn 2019/20	Annual Target 2020/21	Annual Minimum Expectation 2020/21	Target Q3 2020/21	Minimum expectation Q3 2020/21	Outturn Q1 2020/21	Outturn Q2 2020/21	Outturn Q3 2020/21	Last updated	Year on year trend Q3 2020/21	RAG status Q3 2020/21	Comment
NINE	Service user satisfaction with the council's online service offer	66.00%	50.00%	50.00%	50.00%	50.00%	69.10%	56.0%	47.6%	Q3	↓	AMBER	See detail in <i>Our performance</i> section above.
NINE	Residents' satisfaction with Idea Stores and libraries	N/A	64.9%	59.1%	64.9%	59.1%	N/A	N/A	N/A	2018/19	N/A	N/A	The 2020/21 Annual Residents' Survey fieldwork will start in early in 2021 with results reported in the final quarter of the year.
NINE	Residents' perception of being involved in council decision-making	N/A	59.9%	54.1%	59.9%	54.1%	N/A	N/A	N/A	2018/19	N/A	N/A	The 2020/21 Annual Residents' Survey fieldwork will start in early in 2021 with results reported in the final quarter of the year.
NINE	Residents' perception of council transparency	N/A	53.9%	48.1%	53.9%	48.1%	N/A	N/A	N/A	2018/19	N/A	N/A	The 2020/21 Annual Residents' Survey fieldwork will start in early in 2021 with results reported in the final quarter of the year.
NINE	Residents' perception of being kept informed by the council	N/A	74.6%	69.4%	74.6%	69.4%	N/A	N/A	N/A	2018/19	N/A	N/A	The 2020/21 Annual Residents' Survey fieldwork will start in early in 2021 with results reported in the final quarter of the year.
TEN	Residents' satisfaction with council and partner response to antisocial behaviour (ASB)	N/A	54.9%	49.1%	54.9%	49.1%	N/A	N/A	N/A	2018/19	N/A	N/A	The 2020/21 Annual Residents' Survey fieldwork will start in early in 2021 with results reported in the final quarter of the year.
TEN	Children and young people receiving support from mental health services	45.5%	35.0%	35.0%	35.0%	35.0%	N/A	N/A	N/A	2019/20	N/A	N/A	Due to capacity issues caused by Covid-19 we were unable to obtain data from our partners. We expect to be able to start reporting against this measure once these capacity pressures ease.

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Outcome	Indicator Name	Outturn 2019/20	Annual Target 2020/21	Annual Minimum Expectation 2020/21	Target Q3 2020/21	Minimum expectation Q3 2020/21	Outturn Q1 2020/21	Outturn Q2 2020/21	Outturn Q3 2020/21	Last updated	Year on year trend Q3 2020/21	RAG status Q3 2020/21	Comment
TELEPHONE	Residential and nursing admissions (over 65s)	460.2	450	480	337.5	371.3	57.5	105.5	182.2	Q3	↑	GREEN	
TELEPHONE	Number of adults supported into employment by the Workpath partnership	1180	600	540	300	270	8	43	73	Q3	↓	RED	This is a cumulative measure. See detail in Our performance section above.
ELEVEN	Council staff turnover rate	14.14%	9.0%	12.0%	9.0%	12.0%	11.8%	9.6%	10.6%	Q3	↑	AMBER	See detail in <i>Our performance</i> section above.
ELEVEN	Council staff sickness absence rate	10.35%	8.00%	10.24%	8.00%	10.24%	10.8%	11.6%	12.3%	Q3	↓	RED	See detail in <i>Our performance</i> section above.
ELEVEN	Media and press view of the council	91.60%	80.00%	72.00%	80.00%	72.00%	95.0%	92.6%	91.2%	Q3	↑	GREEN	
ELEVEN	Residents' perception of the council doing a better job than last year	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2018/19	N/A	N/A	The 2020/21 Annual Residents' Survey fieldwork will start in early in 2021 with results reported in the final quarter of the year.
ELEVEN	Budget variance for the general fund	TBC	£0	£0	£0	£0	£11.0m	£13.0m	£2.9m	Q3	N/A	RED	Our Budget Monitoring Report 2020-21 Period 9 which is presented to Cabinet in parallel to this report, sets out our budget management actions.