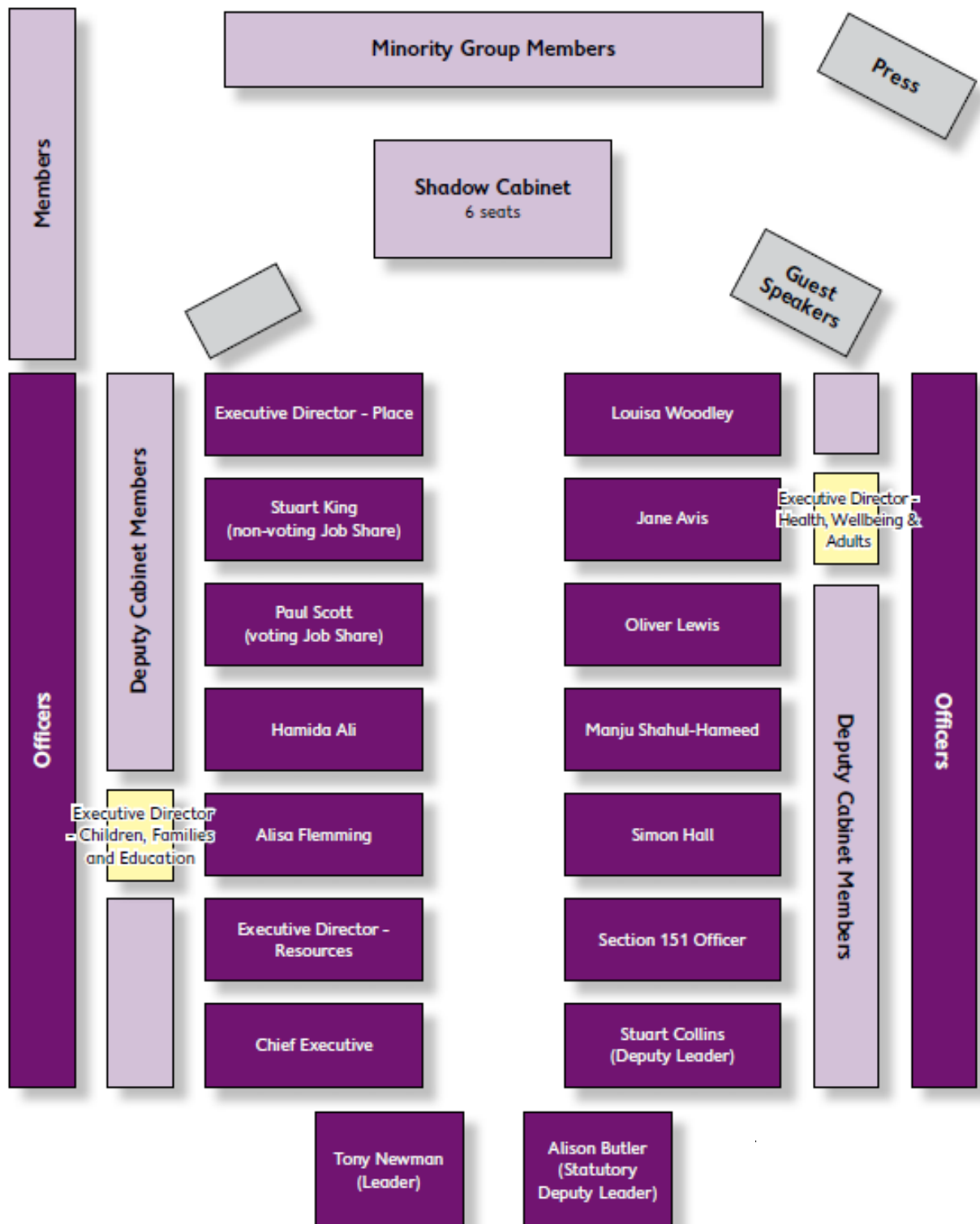




**CABINET
AGENDA**
for the meeting
on
20 January 2020 at
6.30 pm

Cabinet Seating Plan



To: Croydon Cabinet Members:

Councillor Tony Newman, Leader of the Council - Budget and Strategic Policy
Councillor Alison Butler, Deputy Leader (Statutory) and Cabinet Member for Homes & Gateway Services
Councillor Stuart Collins, Deputy Leader and Cabinet Member for Clean Green Croydon
Councillor Hamida Ali, Cabinet Member for Safer Croydon & Communities
Councillor Jane Avis, Cabinet Member for Families, Health & Social Care
Councillor Alisa Flemming, Cabinet Member for Children, Young People & Learning
Councillor Simon Hall, Cabinet Member for Finance & Resources
Councillor Stuart King, Cabinet Member for Environment, Transport & Regeneration (non-voting - Job Share)
Councillor Oliver Lewis, Cabinet Member for Culture, Leisure & Sport
Councillor Paul Scott, Cabinet Member for Environment, Transport & Regeneration (voting - Job Share)
Councillor Manju Shahul-Hameed, Cabinet Member for Economy and Jobs

Invited participants:

Councillor Louisa Woodley, Chair of the Health & Wellbeing Board
All other Members of the Council

A meeting of the **CABINET** which you are hereby summoned to attend, will be held on **Monday, 20 January 2020 at 6.30 pm** in **Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX**

JACQUELINE HARRIS BAKER
Council Solicitor and Monitoring Officer
London Borough of Croydon
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www.croydon.gov.uk/meetings
10 January 2020

Members of the public are welcome to attend this meeting. If you require any assistance, please contact officer as detailed above.

The meeting webcast can be viewed here: <http://webcasting.croydon.gov.uk>

The agenda papers are available on the Council website

www.croydon.gov.uk/meetings

AGENDA – PART A

1. Apologies for Absence

2. Minutes of the previous meeting (Pages 7 - 12)

To approve the minutes of the meeting held on 16 December 2019 as an accurate record.

3. Disclosure of Interests

In accordance with the Council's Code of Conduct and the statutory provisions of the Localism Act, Members and co-opted Members of the Council are reminded that it is a requirement to register disclosable pecuniary interests (DPIs) and gifts and hospitality to the value of which exceeds £50 or multiple gifts and/or instances of hospitality with a cumulative value of £50 or more when received from a single donor within a rolling twelve month period. In addition, Members and co-opted Members are reminded that unless their disclosable pecuniary interest is registered on the register of interests or is the subject of a pending notification to the Monitoring Officer, they are required to disclose those disclosable pecuniary interests at the meeting. This should be done by completing the Disclosure of Interest form and handing it to the Democratic Services representative at the start of the meeting. The Chair will then invite Members to make their disclosure orally at the commencement of Agenda item 3. Completed disclosure forms will be provided to the Monitoring Officer for inclusion on the Register of Members' Interests.

4. Urgent Business (If any)

To receive notice of any business not on the agenda which in the opinion of the Chair, by reason of special circumstances, be considered as a matter of urgency.

Cabinet Member: Cabinet Member for Children, Young People & Learning

5. Future delivery model for Council provided school support services (Pages 13 - 50)

Officer: Robert Henderson

Key decision: no

Cabinet Member: Cabinet Member for Children, Young People & Learning

6. Feedback from the monitoring visit in October 2019 by Ofsted to Croydon's Early Help Services Children's Social Care service (Pages 51 - 60)

Officer: Robert Henderson

Key decision: no

Cabinet Member: Cabinet Member for Children, Young People & Learning

7. Education Estates Strategy (Pages 61 - 170)

Officer: Robert Henderson

Key decision: yes

Cabinet Member: Cabinet Member for Safer Croydon & Communities

8. Equality Framework for Local Government Accreditation (Pages 171 - 196)

Officer: Jo Negrini

Key decision: no

Cabinet Member: Cabinet Member for Families, Health & Social Care

9. Health and Social Care Integration and South West London (Pages 197 - 212)

Officer: Guy Van-Dichele

Key decision: no

Cabinet Member: Cabinet Member for Safer Croydon & Communities

10. Community Fund Commissioning Programme (Pages 213 - 236)

Officer: Jacqueline Harris Baker

Key decision: no

Cabinet Member: Cabinet Member for Safer Croydon & Communities

11. Policy for Council community properties, rent subsidy and rate relief for the voluntary and community sector (Pages 237 - 318)

Officer: Jacqueline Harris Baker

Key decision: yes

Lead Member: Chair of Scrutiny & Overview Committee

12. Stage 1: Recommendations arising from Scrutiny (Pages 319 - 322)

Officer: Jacqueline Harris Baker

Key decision: no

Cabinet Member: All Cabinet Members

- 13. Stage 2: Response to Recommendations arising from Scrutiny & Overview Committee on 2 September 2019, Scrutiny & Overview Committee on 10 September 2019, Streets, Environment & Homes Scrutiny Sub-Committee on 1 October 2019 and Children & Young People Scrutiny Sub-Committee on 5 November 2019 (Pages 323 - 332)**

Officer: Jacqueline Harris Baker

Key decision: no

Cabinet Member: Cabinet Member for Finance & Resources

- 14. Investing in our Borough (Pages 333 - 340)**

Officer: Jacqueline Harris Baker

Key decision: no

Cabinet Member: Cabinet Member for Environment, Transport & Regeneration (Job Share)

- a) Timebridge Community Centre and Fieldway Family Centre Contract Variation (Pages 341 - 352)**

Officer: Shifa Mustafa

Key decision: yes

- 15. Exclusion of the Press and Public**

The following motion is to be moved and seconded where it is proposed to exclude the press and public from the remainder of a meeting:

“That, under Section 100A(4) of the Local Government Act, 1972, the press and public be excluded from the meeting for the following items of business on the grounds that it involves the likely disclosure of exempt information falling within those paragraphs indicated in Part 1 of Schedule 12A of the Local Government Act 1972, as amended.”

Cabinet

Meeting held on Monday, 16 December 2019 at 5.00 pm in Council Chamber, Town Hall,
Katharine Street, Croydon CR0 1NX

MINUTES

Present: Councillor Tony Newman (Chair);

Councillor Alison Butler, Stuart Collins, Hamida Ali, Alisa Flemming,
Simon Hall, Stuart King (non-voting – Job Share), Oliver Lewis,
Paul Scott (voting – Job Share) and Manju Shahul-Hameed

Also Present: Councillors Tim Pollard, Jason Cummings, Jason Perry, Lynne Hale,
Simon Hoar, Yvette Hopley, Vidhi Mohan, Helen Pollard,
Sean Fitzsimons, Robert Ward, Clive Fraser, Margaret Bird,
Simon Brew, Janet Campbell, Nina Degradis and Louisa Woodley

Apologies: Councillor Jane Avis

PART A

111/19 **Minutes of the previous meeting**

The part A minutes of the Cabinet meeting held on 18 November 2019 were agreed. The Leader of the Council signed the minutes as an accurate record.

112/19 **Disclosure of Interests**

There were none.

113/19 **Urgent Business (If any)**

There were no items of urgent business.

114/19 **Place Regeneration**

The Cabinet Member for Environment, Transport & Regeneration (voting – Job Share) introduced the report stating that the intention of Place Plans was to work with local communities to support good growth in the area. Pilots had taken place in South Norwood, Kenley and Selsdon which had seen local communities work to develop and mould their areas.

In response to questions, Members were informed that Place Plans had facilitated areas being awarded large grants for projects as the groups were able to evidence community engagement. Additionally, the Cabinet Member noted that Place Plans could help areas to access CIL

(Community Infrastructure Levy) and Section 106 funding for projects to develop the areas.

Whilst it was the desire that Place Plans were developed in each of the 16 areas of the borough, it was recognised that each Plan would be unique and it was the intention that the council would support all areas to develop their Plans.

The Cabinet Member for Economy & Jobs noted that the reports aligned with the Economic Strategy which had been agreed by Cabinet in November 2019 as it would support developing areas and bringing more jobs and opportunities to areas. Cabinet Members stated that it was their ambition to work together in a holistic manner to create a more inclusive Croydon.

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

RESOLVED: To

1. Endorse the Council's approach to place regeneration;
2. Delegate to the Cabinet Member for Environment, Transport and Regeneration (Job Share) approvals of the Place Profiles before publication; and
3. Delegate the approval of the emerging Place Plans to the Cabinet Member for Environment, Transport and Regeneration (Job Share) in consultation with the local elected members and key stakeholders for each 'place'.

115/19

Pan-London Dockless Vehicle Hire Byelaw

The Cabinet Member for Environment, Transport & Regeneration (non-voting – Job Share) informed Members that dockless bikes had been introduced in parts of London from 2017, however there had been no means to regulate their use. Some boroughs had experienced issues with the bikes, including them being dumped, and to facilitate regulation across the capital it was proposed that a byelaw be introduced. The London Council's Transport & Environment Committee was to be delegated authority by all boroughs to make the byelaw to regulate dockless vehicles in London.

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

RESOLVED: To recommend to Full Council that it resolves to

1. Agree to delegate authority to London Councils Transport and Environment Committee to make a byelaw to regulate dockless

vehicles in Croydon; and

2. Authorise the Executive Director of Place to sign any necessary documents to give effect to Recommendation 1 above.

116/19

Addington Village Conservation Area Review - Adoption

Cabinet were informed that the council was constantly reviewing its conservation areas and the Addington Village Conservation Area had recently been reviewed. It was noted that the area had particular historic significance in the borough and that the Plan sought to not only recognise the village, but also the Palace, grounds and service buildings. It was proposed that the buildings be locally listed to protect them.

The Cabinet Member for Environment, Transport & Regeneration (voting – Job Share) stated that there had been a large amount of feedback received during the consultation and this had been listened to, including retaining the name of the conservation area.

Members thanked officers for the diligent work in reviewing the Plan and welcomed that feedback from residents had been incorporated within the Plan. It was noted that a great amount of the history of the area was included within the documentation, which had facilitated the development of history walks.

In response to Member questions, the Cabinet Member stated that the marquee was an ongoing planning issue and had remained in place beyond the temporary consent. Officers continued to work to ensure its removal. In terms of infill development within the area, the Cabinet Member stated that it was not the intention to restrict future development, however applications would be considered very carefully to ensure they fitted with the character of the local area.

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

RESOLVED: To recommend that Council

1. Approve changes to the Addington Village Conservation Area boundary as set out in the report;
2. Adopt the Addington Village Conservation Area Appraisal and Management Plan (CAAMP) as a Supplementary Planning Document;
3. Delegate to the Director of Planning and Strategic Transport, in consultation with the Cabinet Member for Environment, Transport & Regeneration (Job Share), the making of minor factual, editorial and image changes to the Addington Village CAAMP; and

4. Include the former Stables (Addington Palace Golf Clubhouse) and Stable Lodge on the Council's local list of buildings of special architectural or historic interest.

117/19

Quarter 2 Financial Performance 2019/20

The Leader of the Council congratulated officers for their ongoing work and in particular their work to report the chronic underfunding the council suffered from in terms of Unaccompanied Asylum Seeking Children (UASC). Members were informed that the council would seek to reengage with Government Ministers, once known, as the underfunding was unsustainable.

The Cabinet Member for Finance & Resources recognised the hard work of officers to manage the financial pressures daily. It was noted that significant pressures were being experienced in the Health, Wellbeing & Adults department. In terms of services for over 65s, it had been noted that a number of social care self-funders had run out of funds and were now being supported. Furthermore, additional costs had occurred due to the success of the One Croydon Alliance, however officers were in negotiation with the NHS to establish whether the costs could be shared.

The pressures related to UASC were discussed as being significant as Croydon had four and a half times more children than Home Office guidelines suggested each borough should support. This additional pressure of £8.5m had a large knock on effect across the council, particularly for children services.

Lastly the Cabinet Member informed Members that the council was required to provide support to Looked After Children up to the age of 25; however this was not funded and so further increased the financial pressures experienced by the council.

The Leader of the Opposition confirmed the Opposition's support for the council's desire to get a fairer settlement in terms of UASC support and stated that they would support conversations with the new Minister, once confirmed. The Leader thanked the Opposition for their support and the support of the three Croydon MPs on the matter and expressed hope that a fairer settlement would be reached.

Members noted that there had been a large shift in the Health, Wellbeing & Adults finances since the Quarter 1 report and queried what plans were in place to mitigate the trend. The Cabinet Member stated that finance were working with officers from that department, however it was a department which was experiencing huge pressures and to mitigate the trend the council had undertaken robust negotiations with the NHS to ensure the Alliance was properly financed. Whilst the CCG had recognised the principle of the council's argument, an agreement was yet to be reached. Additionally, stringent measures had been put in place and

all in-year actions across the council were being reviewed as to whether savings could be accelerated.

In response to Member questions the Cabinet Member for Homes & Gateway Services stated that in-year budgets had been reduced and so not all posts had been filled. Remaining staff had been required to deliver the same service, however it was noted that it was not always possible and, as such, it was not always possible to ensure services such as collecting garage rents was 100%.

Members expressed hope that the new Local Government settlement would be announced before the New Year and that it would be fairer which would enable the council to deliver excellent services to the residents of Croydon.

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

RESOLVED: To

1. Note the current revenue outturn forecast at the end of the second quarter of 2019/20 of £1.857m, before exceptional items of £8.550m, resulting in a total overspend of £10.407m;
2. Note that the exceptional items of £8.5m relate to costs incurred by Croydon Council for Unaccompanied Asylum Seeking Children (UASC) and No Recourse To Public Funds (NRPF), due to woefully insufficient funding from the Home Office.
3. Note the ongoing engagement with and lobbying of Government by the Council for additional funding for Croydon, both in general terms and specifically Unaccompanied Asylum Seeking Children given Croydon's gateway status.
4. Note the HRA position of a £0.046m forecast underspend against budget.
5. Note the capital outturn projection of £278.6m, forecast to be an underspend of £160.8m against budget.

RESOLVED: To recommend to Council

1. The approval to increase to the capital programme by £2.660m as set out in Table 6.
2. The adoption of the lending criteria as set out in section 9 of this report.

118/19

Investing in our Borough

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

RESOLVED: To note

1. The list of delegated award decisions made by the Director of Commissioning and Procurement, between 17/10/2019 – 15/11/2019.

RESOLVED: To approve

2. That the Leader be recommended to delegate authority to the Cabinet Member for Families, Health & Social Care in consultation with the Cabinet Member for Finance and Resources to:
 - a. Approve the establishment of the Adult and Young People Social Care Dynamic Purchasing System (DPS) and the award of contracts to providers to be initially appointed to the DPS.
 - b. Delegated authority to approve the future appointments to the DPS and award of individual call off contracts to providers for reasons set out in paragraph 4.2 of the report. These awards will be in line with the strategy approved by Cabinet on 10 July 2019 (ref CCB1498/19-20) and any awards made under this delegation will be notified in the standard contracts report at future Cabinet meetings.

119/19

Exclusion of the Press and Public

The item was not required.

The meeting ended at 5.36 pm

REPORT TO:	CABINET 20 JANUARY 2020
SUBJECT:	Future delivery model for Council provided school support services
LEAD OFFICER:	Robert Henderson: Executive Director Children, Families & Education Julie Ralphs: Head of Service Education Commissioning
CABINET MEMBER:	Councillor Alisa Flemming: Lead Member for Children, Families and Learning
WARDS:	All
CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON Corporate Plan for Croydon 2018-2022 Corporate Plan 2018 - 2022 This report aligns with the new operating model – ‘getting the basics right for residents’ and will contribute to the delivery of the following key priority / outcome: ‘Our children and young people thrive and reach their full potential: <ul style="list-style-type: none"> • Children and young people in Croydon are safe, healthy and happy, and aspire to be the best they can be • Every child and young person can access high quality education and youth facilities 	
FINANCIAL IMPACT The current contract value cost is £952k with additional costs covered centrally, bringing the total budget available to £1,010k and is funded from the Council’s General Fund (£772k) and other government grants. It is expected that there would be no change to the contract or budget cost within the first 12 months. Additional costs from the in-sourcing have been identified including costs of project management, IT equipment, and legal fees and will not result in any extra burden to the Council’s general fund. There is potential for future savings via amalgamation of Octavo Partnership and Council systems and processes which will be implemented within 12 months of transfer. Limited growth opportunities have also been identified which will be investigated further following transfer.	
FORWARD PLAN KEY DECISION REFERENCE NO: FOR INFORMATION ONLY – NOT A KEY DECISION	

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

The Cabinet is recommended to

- 1.1 Note the contents of the report and the proposed approach. If the

2. EXECUTIVE SUMMARY

- 2.1 This paper provides information, rationale and proposed model to Cabinet about the in-sourcing of services delivered by the Octavo Partnership back into the Local Authority.
- 2.2 The proposal to 'Make' contracted services was approved at the Council's Contracts & Commissioning Board (CCB) in April 2019.
- 2.3 A proposal was made to the Octavo Partnership's Board in summer 2019 by the Council to in-source all Octavo Partnership delivered services, both commissioned and commercial, with a proposed effective date of 1st April 2020. There is scope to extend the current contract to 31st March 2021 if additional time is required.
- 2.4 In October 2019, Octavo Partnership Members (Croydon Head Teachers Association, Octavo Staff and Croydon Council) voted unanimously in favour of accepting the proposal that Octavo Partnership Limited should cease to exist as a separate legal entity and that its staff and activities should move into Croydon Council.
- 2.5 Following CCB approval and Octavo Partnership Member Vote, the Executive Director for Children, Families and Education and Lead Cabinet Member for Children, Families and Learning made the delegated decision to insource all Octavo Partnership functions with a proposed date of the 1st April 2020.
- 2.6 Octavo Partnership functions and staff will be transferred to the Local Authority under TUPE arrangements. Initial external legal advice has been sought and ongoing advice will be provided on a range of matters including: TUPE, use of brand, transfer of sensitive information/GDPR implications, transfer of assets and liabilities, including pensions.
- 2.7 All Octavo Partnership services and staff will move to the Council.
- 2.8 It is the intention to retain Octavo brand, premises (Council owned) and SLA online/website to minimise impact on schools and continue on a 'business as usual' basis.
- 2.9 The Octavo Partnership will be dissolved, and any assets remaining after settlement of liabilities will be distributed as permitted by the Articles of Association and agreement of Octavo Partnership Members.

3. DETAIL

Company formation and governance

- 3.1 Following Cabinet approval on 30 September 2013 and 30 June 2014, the Octavo Partnership was established as a mutual trading company in April 2015 in accordance with the Local Government Act 2003 and the Localism Act 2011 to provide a range of school support services to Croydon schools.
- 3.2 It was established within a context of government policy to establish mutual companies, national emphasis on schools to both help themselves and to help one another and schools having greater flexibility to directly purchase services they need, devolution of budgets to schools for this purpose and growth in academies. The intention of establishing Octavo Partnership was to have a greater emphasis on a partnership approach via a mutual offer and to provide a vehicle that was more agile and commercially focussed to meet these demands.
- 3.3 Octavo Partnership is a mutual company owned by Croydon Head Teacher Association (CHTA) (40%), Croydon Council (40%) and Octavo employees (20%). The Octavo Board consists of Directors drawn from these three partners (4:4:2 ratio) who are responsible for the oversight and strategy of the organisation. Significant decisions (including winding up of the business) are made by the Members – with each partner having one membership vote. The Council's Member is the Cabinet Member for Children, Families and Learning, with CHTA and staff members responsible for ascertaining how their Member vote will be determined.
- 3.4 The Council has an Octavo Steering Group, consisting of officers from Legal, HR, Education, Commissioning and Finance. The role of this group has evolved over time, firstly providing advice and support for the Octavo Partnership formation through to contract monitoring and more latterly conducting options appraisals and recommendations in regards to future commissioning intentions and delivery models. Moving forward, this Group will provide guidance and support in relation to the insourcing of Octavo Partnership staff and functions.
- 3.5 Plans are in train to develop and implement a local Education Partnership, with membership drawn from schools, colleges and other key stakeholders. The Partnership will lead on development of local education strategy with the intention that this will have a role in shaping delivery of Council services to schools in the future.

Contract

- 3.6 Since formation, the Council has commissioned Octavo Partnership to deliver educational psychology and school improvement services on its behalf. This includes delivery of some statutory services. The Contract Award was approved by Cabinet on 30 June 2014. The contract was for three years (1st April 2015 to 31st March 2018) with the option of up to 3 x 1 year extensions taking it to a maximum expiry date of 31st March 2021. The first 2 on these one year extensions have been utilised with the current contract expiring on the 31st March 2020.

- 3.7 The value of the commissioned contract for the period 1st April 2019 to 31st March 2020 is £951,965. The total commissioned spend for the period 1st April 2015 to 31st March 2020 (3 year contract plus 2 x 1 year extensions already implemented) is £5,039,031 against Cabinet approval for £5.5m for the life of the contract, including extensions.
- 3.8 External legal advice has confirmed that once all the contract extensions have been exhausted, the Council must 'buy' services by conducting a competitive process to procure these services in compliance with Public Procurement Regulations or 'make' the services by bringing them back in-house.
- 3.9 Delivery of the contract has been largely successful. The secondary/ post-16 element of school improvement commissioned services was in-sourced in April 2019 due to some delivery challenges, mainly related to recruitment and retention of suitable staff leading to inconsistent delivery.
- 3.10 At formation, the ambition of the Company was that it would be wholly viable without the LA contract by the end of the contract term. There was also an expectation that there would be a scaled reduction in the contract value over the contract term. This has not been achieved, partly due to the changing education landscape over the years since formation. Although the company is now trading in a surplus position, the loss of the Council contract will undermine its future financial viability.

Services sold to schools

- 3.11 In addition to the commissioned contract, Octavo Partnership sells a range of services, predominantly to Croydon schools although some services are also delivered to neighbouring boroughs. These 'sold' services include: educational psychology, school improvement, school finance, HR services to schools, IT support, teacher recruitment and CPD.
- 3.12 Unviable services – including the Literacy Centre, Education Business Partnership and Education Welfare Service – have ceased trading.
- 3.13 Operational costs, including back office 'centralised' functions, have been rationalised to ensure economic viability. This rationalisation and cessation of uneconomic services led to a small trading surplus in 2018, after 3 years of trading deficit, and a projected trading surplus of c£308k in 2019. Octavo operates on a 1st January to 31st December financial year basis.
- 3.14 With the exception of education psychology, school improvement and governance, all other services are wholly reliant on sold services to cover all operating costs.
- 3.15 There is a trend of reducing company income year on year, meaning that the profits in 2018 and 2019 (forecast) have been achieved via company efficiencies/reduced costs rather than market growth.

- 3.16 Commercial sales of c£2.4m (2018) account for 65-70% of company turnover, with all schools in Croydon buying at least one service, usually educational psychology.
- 3.17 The original mutual proposal and viability was predicated on growing traded income by 2 - 5% per annum (from a pre-Octavo baseline of £3.7m achieved in 2013/14), through selling additional services to current customers in Croydon, as well as growing the out of borough customer base. This has not been achieved overall, although some areas have increased their traded income.
- 3.18 The Council also sells a range of services to schools, including: insurance and risk management, occupational health, Best Start early learning, legal services, teachers' pensions, post-16 prospectus and facilities management. The total amount of income achieved in 2018/19 was £953k.

Staffing

- 3.19 Octavo Partnership currently (Nov-2019) has 44 members of substantive staff equating to 38 FTEs.

In addition there are 30 'casual' staff and associates who are utilised on an ad-hoc basis as governing body clerks, trainers and facilitators, school improvement and governance associates and finance service support at variable costs – hourly, sessional or daily rates apply. The employment rights of these staff will be ascertained as part of the in-sourcing project and appropriate action taken.

- 3.20 The proposal is to transfer all employees, who fall within the scope of the TUPE regulations, from Octavo Partnership to the Council effect from transfer date, which we anticipate will be 1st April 2020.
- 3.21 The Council will ensure transparency over plans for any subsequent structural reorganisation required for economic, technical or organisational (ETO) reasons, in accordance with the normal HR policies and procedures.

Next steps

- 3.22 Appointment of project manager and support to develop and implement the project plan in conjunction with the Octavo Partnership's interim CEO and Board.
- 3.23 External legal advice has been commissioned in relation to transfer of company assets (including any funds held), use of the Octavo branding, transfer of management information and amendments to/ transfer of any contracts and licenses.
- 3.24 Once further HR and legal advice is obtained, commencement of the TUPE process, including relevant and meaningful consultation with staff and representatives.
- 3.25 Octavo Partnership Board to take necessary steps in relation to dissolution of the Company.

- 3.26 Working towards in-sourcing date of 1st April 2020, but with contingency to extend contract by up to 12 months (which will be the subject to the Contracts and Tender Regulations and requirements of public procurement) if required.

4. CONSULTATION

- 4.1 The main recipients of Octavo Partnership delivered services are local schools, who are represented on the Octavo Partnership Board. Other key stakeholders are Octavo Partnership staff and the Council, both of which are also represented on the Octavo Partnership Board.
- 4.2 Initial engagement with Octavo Partnership staff was conducted via their Octavo Partnership Board Membership, on which there are two staff directors. A meeting with all staff also took place on the 18th September 2019, at which the proposal was outlined and questions taken. This was followed up with team meetings, drop in sessions, 1-2-1 meetings and Frequently Asked Questions. This culminated in the staff vote conducted in October 2019 on whether to accept or decline the proposal. Staff voted overwhelmingly to accept the proposal to in-source services to the Council.
- 4.3 Engagement with Octavo Partnership's staff will continue throughout the period leading to the dissolution of the Company, and formal TUPE consultation with the affected employees is expected to start in the New Year, 2020. This is being led by the Octavo Partnership senior leadership team and Board, in collaboration with the relevant Council officers.
- 4.4 Engagement with Council colleagues was undertaken via the Octavo Steering Group. This involved options, risks and proposals being explored by colleagues across Legal, HR, Finance, Education, Commissioning and Procurement. These options and recommendations were also shared with the Lead and Deputy Lead Members.
- 4.5 The Council and Octavo Partnership Board have worked closely in development and agreement of the proposal to bring all services in house. The Octavo Partnership Board includes representation from Octavo Staff, Council staff and CHTA, who have consulted with their members on the proposal and subsequent Member vote. This includes consultation with the Council Member (Lead Cabinet member for Children, Families and Learning) prior to the Member vote.
- 4.6 The proposal to 'Make' services was approved at the Council's Contracts & Commissioning Board (CCB) in April 2019. Proposals have also been shared with Department Leadership Team (DLT) and Executive Leadership Team (ELT) in December 2019.
- 4.7 The Council and Octavo Partnership Board (representing schools, Council and staff) will continue to work closely to ensure the smooth transition of functions to the LA. This will ensure that relationships are maintained and new operational models are developed collegiately whilst addressing service-user needs.

- 4.8 Wider market consultation is not deemed necessary as the proposal is to return to a 'make' model with the TUPE of staff and retention of service delivery functions.

5 PRE-DECISION SCRUTINY

- 5.1 This paper has not gone to Pre-Decision Scrutiny as there is no key decision associated with this report – it is for Cabinet noting/information purposes only made at the request of the Lead Member for Children, Families and Learning.
- 5.2 A delegated decision was made by the Executive Director for Children, Families and Education and Lead Cabinet Member for Children, Families and Learning to insource Octavo Partnership services/functions. This was following approval by CCB in April 2019 to 'Make' commissioned education psychology and school improvement services, and the Octavo Partnership Membership voting unanimously in October 2019 to dissolve the company and transfer both commissioned and commercial services to the Council.

6 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 6.1 The full financial implications will be considered and quantified during the project cycle and any subsequent structural reorganisation arising from ETO.
- 6.2 External Legal advice is being sought to confirm how any company assets, including cash, can be distributed upon the company's dissolution.

Current income and expenditure

- 6.3 The Council currently commissions Octavo Partnership for the sum of £952k per annum. There is no anticipated increase/decrease in the Council budget as this provides mainly for statutory services which will revert to in-house delivery from the proposed date of 1st April 2020. LA budget and expenditure for 2019/20 as follows:

Description	Budget 2019/20	Forecast Expenditure 2019/20
General Fund	£771,834	
Dedicated Schools Grant (EYFS)	£33,085	
Pupil Premium Grant (CLA)	£29,900	
High Needs Fund (SEN)	£175,145	
Annual Contract Value		£951,961
Contingency & legal costs		£13,000
Commission KS3-KS5 school improvement support (in-sourced Apr-19)		£45,000
Totals	£1,009,961	£1,009,961

- 6.4 Octavo's forecast expenditure for the current financial year is just below £3m, meaning that sales income of c£2m is required to breakeven whilst maintaining the current level of delivery. A surplus of £260k (before tax) for the financial year to 31st December 2019 is forecast.

Staff related costs (direct and indirect) is the biggest outlay at approximately 90% of total expenditure. As the majority of other overheads will need to be retained (premises, website etc.) any savings to be achieved would need to be either by reduction in staff costs and/or growth in sales/increase in profit margin.

Forecast income and expenditure for the year 1st January 2019 to 31st December 2019:

FORECAST (INCOME) & EXPENDITURE FOR 1st JANUARY 2019 to 31st DECEMBER 2019					
TEAM	INCOME	STAFF COSTS	OTHER COSTS	OVERHEADS	(PROFIT)/LOSS
CENTRAL SERVICES	(582)	235,588	201,451	(436,236)	221
GRANTS/ERASMUS	(242,380)	73,123	153,734	10,692	(4,831)
EDUCATIONAL PSYCHOLOGY	(1,212,055)	788,797	58,481	159,972	(204,805)
FINANCE	(60,003)	42,214	6,732	8,340	(2,717)
GOVERNANCE	(382,934)	287,226	11,990	58,992	(24,726)
HR	(309,501)	237,001	4,140	46,020	(22,340)
IMPROVEMENT & DEVELOPMENT	(664,227)	508,103	20,999	102,624	(32,501)
IT	(403,491)	258,093	79,506	49,596	(16,296)
Sub-total	(3,275,173)	2,430,145	537,033	0	(307,995)
Cumulative loss brought forward from 2018					48,000
Forecast (Profit) 2019 before tax					(259,995)

Risks and potential costs

- 6.5 Potential costs related to in-sourcing could include: pension liabilities/other staff costs, infrastructure costs (e.g. IT equipment), legal fees and project management costs. These will be quantified as part of the project but are currently forecast as:

Description	Estimated Value	Comments/Source of funding
Project management Oct-19 to Apr-20 (£400 per day x 2 days per week)	£22,400	Absorbed within existing staff and budgets
Renewal of IT hardware & infrastructure costs	£50,000	Includes replacement of hardware with LBC issued (£32,000) plus allowance for networking and server costs. Costs to be covered from traded income.
Legal Costs	£12,500	Built into budget for contract 2019/2020
Staff liabilities, including pensions	TBC	To be confirmed as part of TUPE due diligence – Costs to be covered from traded income
Communications	£500	Built into budget for contract 2019/20
TOTAL	£85,400	To be absorbed within current budgets and from traded income surplus funding

- 6.6 As approximately 2/3rds of costs are covered by income generated from sales and grants, any decrease in these will have an impact on affordability and ability to cover expenditure.

Since its establishment in 2015, Octavo Partnership's income generated has reduced year on year. This has been for a variety of reasons including the growth in Multi Academy Trusts (who may provide directly or procure support services across their trust) and less funding generally available in the sector.

With the exception of educational psychology and school improvement (which will continue to be partly funded via LA funding as outlined in para 5.3), all other in-sourced services will be required to cover their costs in full via sales and/or grant income. This will be continually monitored and mitigating action taken as outlined in para 5.13

Forecast funding for the next 3 years assumes maintaining the current budget from General Fund and Government education grants. Opportunities for increasing traded income will be explored, as will potential to make savings via amalgamation of systems and processes. Commercial services which are not financial viable will cease.

Any trading surplus achieved will be utilised to address local Children and Education priorities.

3 year forecast - income and expenditure

Description	Baseline 2019/20 (Actual)	2020/21 (Forecast)	2021/22 (Forecast)	2022/23 (Forecast)
Staff costs (Octavo & LA)	£2,475,145	£2,524,648	£2,575,141	£2,626,644
Other Costs (IT, premises, legal, resources and contingency etc.)*	£550,055	£600,055	£505,950	£516,069
Total Expenditure	£3,025,200	£3,124,703	£3,081,091	£3,142,713
General Fund	(£772,000)	(£772,000)	(£772,000)	(£772,000)
Other Government Education Funding Grants	(£238,000)	(£238,000)	(£238,000)	(£238,000)
Total funding received	(£1,010,000)	(£1,010,000)	(£1,010,000)	(£1,010,000)
Income achieved from traded services (Forecast to breakeven)	(£2,323,173)	(£2,111,703)	(£2,071,091)	(£2,132,713)
Net Difference	(£308,000)	£0	£0	£0

*2020/21 includes an additional allowance for set up costs, specifically for replacement IT hardware and infrastructure. 10% saving against 2021/22 'other costs' to be achieved by process/system efficiencies.

2% annual inflation rise applied to staff and other costs.

Options appraisal – future commissioning decision

- 6.7 The Council's Steering Group undertook a full options appraisal in 2018/2019 in regards to future commissioning intentions. Various options (and hybrids of these options) were considered, with the following conclusions made:

Option 1: Commission (buy) educational psychology and school improvement services from the market via a competitive procurement process.

Not recommended: Could result in a disjointed offer to local schools and threat to local LA and schools partnership working arrangements. Would threaten viability of Octavo Partnership if they were not successful.

Option 2: In-source commissioned services only (make).

Partially recommended: This will enable the alignment of educational psychology and school improvement services within the LA with wider services delivered by the LA to schools and children. However, this would present challenges in regard to separation of commissioned and sold services if delivered across two organisations – Council and Octavo Partnership – resulting in disjointed and confusing service delivery to schools.

Option 3: LA makes offer to Octavo Partnership Board to in-source all services, both commissioned and sold, resulting in dissolution of the Octavo Partnership company. This option is dependent on Octavo Partnership Members unanimously voting in favour of this proposal.

Recommended: This option presents the opportunity to retain what works well at Octavo Partnership, improve alignment with council delivered services, minimise service delivery disruption to schools and children, and have a viable delivery model.

- 6.8 RP1 (Make or Buy) Report was presented to CCB in April 2019 recommending option 2 – ‘Make’ - above, as it is not within the Council’s gift to approve option 3. This was approved on the 11th April 2019.
- 6.9 Council officers met with the Octavo Partnership Board of Directors on the 18th July 2019. At this meeting, Council officers made the offer to in-source all Octavo services to the Council. The Octavo Board of Directors agreed in principle to the proposal subject to the final decision being subject to a member vote in autumn 2019.
- 6.10 The Council wrote to Octavo Partnership on the 9th September 2019 to give notice of our intention not to extend the contract beyond the existing term – 31st March 2020 - although there is scope to extend the contract for up to a further 12 months if additional time is required.
- 6.11 In October 2019, Octavo Partnership Members (Croydon Head Teachers Association, Octavo Partnership Staff and Croydon Council) voted unanimously in favour of accepting the Council’s offer to in-source all services. The impact of this is that Octavo Partnership Limited should cease to exist as a separate legal entity and that its staff and activities should move into Croydon Council under the Education Directorate, thereby providing the go ahead to proceed with **option 3.**

Future savings/efficiencies

- 6.12 Future efficiencies may be possible via streamlining and amalgamation of Council and Octavo Partnership processes and services to reduce duplication. These will be explored and implemented within 12 months of transfer, i.e. during the 2020/21 financial year.

- 6.13 Additionally, this proposal provides an opportunity to build on current predicted trading surplus (£308k before tax) by:
- maximising earnings potential from local schools and neighbouring boroughs;
 - sourcing other income streams to support local schools, e.g. grants;
 - retaining and building upon profitable services; and
 - cessation, either in full or part, of non-profitable services.
- 6.14 Approved by: Kate Bingham, Head of Finance (Children, Families and Education) on behalf of Lisa Taylor, Director (Finance, Investment and Risk and Section 151 Officer).

7. LEGAL CONSIDERATIONS

- 7.1 The Director of Law and Governance comments that there are no direct legal implications arising from the recommendations in this report. The Department continues to seek external legal advice as detailed above.
- 7.2 Approved by Sean Murphy Director of Law and Governance & Deputy Monitoring Officer.

8. HUMAN RESOURCES IMPACT

- 8.1 As stated above, this report makes recommendations involving service provision changes which is likely to invoke the effects of the Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE).

The Council has begun working, and engaging, with senior management within Octavo Partnership (such as their Acting CEO and HR lead) in preparation for managing the TUPE transfer process. This includes an assessment of the activities to determine who may be in or out of scope to transfer to the Council; and undertaking a due diligence process of HR data/information to inform any measures.

It is anticipated that formal TUPE consultation with the affected staff group(s) (within Octavo Partnership and the Council) will commence early in the New Year, 2020. The Council will work closely with Octavo Partnership to ensure that the appropriate TUPE protocols are applied (particularly the duty to consult with the recognised trade unions and staff) and will ensure that the appropriate HR policies and procedures are adhered to.

- 8.2 Approved by: Debbie Calliste, Head of HR for HWA on behalf of the Director of Human Resources

9. EQUALITIES IMPACT

- 9.1 An EQIA has been completed and approved. Further consideration to equalities implications will be undertaken as part of the TUPE process.

9.2 Approved by: Yvonne Okiyo, Equalities Manager

10. ENVIRONMENTAL IMPACT

10.1 No environmental sustainability impacts, positive or negative, identified in relation to this report

11. CRIME AND DISORDER REDUCTION IMPACT

11.1 There are no reduction/prevention of crime and disorder implications identified in relation to this report.

12. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

12.1 Information report only.

12.2 This report has been presented at the request of the Lead Cabinet Member for Children, Families and Learning. .

13. OPTIONS CONSIDERED AND REJECTED

13.1 Please refer to para 6.7. Options appraisals were conducted and discussed with the Council's Octavo Steering Group, Lead Cabinet Member and presented to CCB for approval as part of the RP2 Report recommending to 'Make' Services which was approved in April 2019.

13.2 The ultimate decision regarding the proposed dissolution of the Octavo Partnership was voted upon by Octavo Partnership Members in accordance with its constitution, including the Lead Cabinet Member for Children, Families and Learning voting in her capacity as Council's Member of the Octavo Partnership.

14. DATA PROTECTION IMPLICATIONS

14.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

YES

Personal information is held by Octavo Partnership, both on its own behalf (in relation to its sold services) and also in the conducting of its contractual requirements with the Council. A DPIA has been completed to ensure that personal data is collected, processed and stored in compliance with regulations.

It is anticipated that this proposal will reduce data protection implications, as a third party (Octavo Partnership) will no longer be required to process sensitive

information on behalf of the Council, thereby mitigating the risk of any breach. .

14.2 The Interim Director of Education comments that a DPIA has been completed, with relevant measures to be implemented to mitigate any risks of data breaches.

14.3 Approved by Shelley Davies, Interim Director of Education

CONTACT OFFICER: Julie Ralphs Head of Education Commissioning

APPENDICES: Appendix 1 – Equalities Impact Assessment
Appendix 2 – DPIA

BACKGROUND PAPERS: Options Appraisal
RP1 Make or Buy report April 2019

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Equality Analysis Form

Insourcing of Octavo Services

1. Introduction

1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

2. Proposed change

Directorate	Education
Title of proposed change	Insourcing of Octavo Services
Name of Officer carrying out Equality Analysis	Julie Ralphs

2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

This proposed change covers:

- **De-commissioning**
- **In-sourcing**
- **Possible future restructure**

In-sourcing all Octavo delivered services (both commissioned and commercial) and dissolving the Octavo Partnership with a proposed effective date of 1st April 2020. With a focus on:

- Minimising the impact to schools by retaining as much as possible of what at Octavo works well (subject to legal advice on use of name, assets, website etc.) and maintaining a continuity of service;
- Subsuming Octavo staff and functions into the Education Directorate of the LA;
- Amalgamation of LA and Octavo systems and processes, reducing duplication wherever possible and appropriate.

Rationale:

Since formation in April 2015, the Council has commissioned Octavo to deliver Educational Psychology and School Improvement Services on its behalf. This includes some statutory services. In addition, Octavo sells a range of services to schools, including: education psychology, school improvement, governance, HR, IT and Finance.

The contract was for three years (1st April 2015 to 31st March 2018) with the option of up to 3 x 1 year extensions taking it to a maximum expiry date of 31st March 2021. The first 2 on these one year extensions have been utilised with the current contract expiring on the 31st March 2020.

External legal advice has confirmed internal advice that, once all the contract extensions have been exhausted, the Council must conduct a competitive process to procure these (education psychology and school improvement) services in compliance with Public Procurement Regulations. This has been deemed too high risk to both the Council and Octavo.

Separation of the delivery of commercial and commissioned education psychology and school improvement services across two organisations would prove problematic and fragmented for schools which could lead to reputational damage and loss of income.

Both the LA Octavo Steering Group and the Octavo Board agree Octavo is unlikely to be viable without the LA contract.

Therefore the Council made an offer to the Octavo Board to insource all Octavo services (commercial and commissioned). Members of Octavo (LA, Croydon Head Teacher Association and Octavo Staff) subsequently voted unanimously in favour of this proposal which will result in Octavo services being insourced to the LA and the company being dissolved.

3. Impact of the proposed change

Important Note: It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

3.1 Deciding whether the potential impact is positive or negative

Table 1 – Positive/Negative impact

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	Neither positive or negative impact is anticipated for any of the protected groups as the proposal is to effectively 'lift and drop' a full service from one organisation (Octavo Partnership) to another (LA). This will mean both staff and service continuity, meaning minimal impact for both staff and service users (schools). Octavo premises are also be retained, which again eliminates any impact.		Options appraisal undertaken as part of decision making including SWOT Staff Consultation
Disability			
Gender			
Gender Reassignment			
Marriage or Civil Partnership			

Appendix

Religion or belief	TUPE process will apply, so consideration will be made to ensure that all staff have access to information, including relevant consultation, e.g. staff on maternity leave. Most changes will relate to changes in line management, although there is potential for a subsequent restructure impacting on a very minimal number of posts. Although any restructure is unlikely to impact positively or negatively on any particular protected characteristics, this will form consideration and an equality analysis will be undertaken as part of the restructure process.	CHTA consultation with schools
Race		
Sexual Orientation		
Pregnancy or Maternity		

Important note: You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

3.2 Additional information needed to determine impact of proposed change

Table 2 – Additional information needed to determine impact of proposed change

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:		
Additional information needed and or Consultation Findings	Information source	Date for completion
Ongoing consultation with Octavo staff, including relevant TUPE requirements	Staff meetings, 1-2-1 meetings, FAQs	31 st March 2020
Ongoing consultation with schools via CHTA partial ownership of Octavo	CHTA via Octavo Board meetings	31 st March 2020
EQIA to be undertaken as part of any subsequent restructure.	Staff records and consultation	When required

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)

- 2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact)
- 3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

Severity of Impact	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	Likelihood of Impact			

Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

Table 3 – Impact scores

Column 1	Column 2	Column 3	Column 4
PROTECTED GROUP	LIKELIHOOD OF IMPACT SCORE Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group. 1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact	SEVERITY OF IMPACT SCORE Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group. 1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact	EQUALITY IMPACT SCORE Calculate the equality impact score for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group. Equality impact score = likelihood of impact score x severity of impact score.
Age	1	1	2
Disability	1	1	2
Gender	1	1	2
Gender reassignment	1	1	2
Marriage / Civil Partnership	1	1	2
Race	1	1	2
Religion or belief	1	1	2
Sexual Orientation	1	1	2
Pregnancy or Maternity	1	1	2

4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups ☐

Eliminating unlawful discrimination, harassment and victimisation ☐

Fostering good relations between people who belong to protected characteristic groups ☐

Important note: If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

5. Action Plan to mitigate negative impacts of proposed change

Important note: Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

Table 4 – Action Plan to mitigate negative impacts

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	None anticipated but ongoing review of any emerging risks will be undertaken	In-going consultation with staff throughout the process, including with formal TUPE process. Ensuring any staff on maternity leave have access to all information and consultation opportunities	Project Manager HR (LA) HR (Octavo)	31 st March 2020
Race				
Sex (gender)				
Gender reassignment				
Sexual orientation				
Age				
Religion or belief				
Pregnancy or maternity				

Equality Analysis

Marriage/civil partnership				
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6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter X in column 3 (Conclusion) alongside the relevant statement to show your conclusion.		
Decision	Definition	Conclusion - Mark 'X' below
No major change	<p>Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</p> <p><i>The project aims to retain the current business model and service offer with minimal disruption to service delivery and staffing. Staff changes are anticipated to be very minimal, mainly line management changes, and there will be service continuity. Main changes will relate to process, for example change of payroll provider and moving financial transactions over to the LA system.</i></p>	X
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form	
Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	

Equality Analysis

Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet	Meeting title: Cabinet Date: January 2020
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7. Sign-Off

Officers that must approve this decision	
Equalities Lead	Name: Yvonne Okiyo Date: 21.11.19 Position: Equalities Manager
Director	Name: Shelley Davies Date: 21.11.19 Position: Interim Director of Education

Data Protection Impact Assessment (DPIA)

Project Name:	Octavo Services Insourcing
Project Manager or Sponsor (PM):	Julie Ralphs
Name of person completing the DPIA if different to (PM):	Julie Ralphs
Service Team and Department:	Education
Relevant Director and Executive Director:	Shelley Davies / Robert Henderson
Information Management Champion(s) for service area:	Julie Ralphs
Date DPIA received by the IMT:	
Date approved by DPO:	2 January 2020
Date approved by IMT :	

1 Project Scope

You should describe here the nature, scope, context and purpose of the processed processing.

(Include the projects aims, potential impact, all individuals involved in the project and those that may be affected by it. The stakeholders should be as broad as possible so that the list can be edited down after consultation. You should summarise why you identified the need for a DPIA).

Background

In-sourcing all Octavo delivered services (both commissioned and commercial) and dissolving the Octavo Partnership with a proposed effective date of 1st April 2020. With a focus on:

- Minimising the impact to schools by retaining as much as possible of what at Octavo works well (subject to legal advice on use of name, assets, website etc.) and maintaining a continuity of service;
- Subsuming Octavo staff and functions into the Education Directorate of the LA;
- Amalgamation of LA and Octavo systems and processes, reducing duplication wherever possible and appropriate.

Services (and related staff) being brought in house to the LA are:

- Educational psychology (commissioned and commercial)
- School improvement (commissioned and commercial)
- HR for schools (commercial)
- IT for schools (commercial)

Appendix 2

Information Management Team: **Data Protection Impact Assessment**
Version 2:0

- Finance for schools (commercial)
- School Governance services (commissioned and commercial)

Project management

A high level project plan has been developed covering the whole project of in-sourcing the service, functions and staff. This includes a specific section on Information Management/GDPR as follows:

- Personal and/or sensitive information held by Octavo identified
- Legal advice obtained on transfer, storage and/or destruction of sensitive information
- Terms of Privacy Statements/Information Sharing Agreements reviewed and amended
- DPIA produced and approved

Information held

Identification of this forms part of the Project Plan. Octavo currently utilises a combination of LA (educational psychology services) and Octavo (all other services) systems. Sensitive information held is anticipated to relate to:

- Octavo staff, including HR records
- Pupils (educational psychology services for children with Special Educational Needs (SEN))
- Schools staff, including governors

2 Data Description

Answer the questions below so that there is a clear understanding about how the information will be used, who will use it etc. Remember that it's personal information (i.e. information about individuals) that you need to be concerned with. If you do not have answers to all the questions at this time, simply record what you do know.

Whose information is being used?

- Are there additional concerns that need to be considered due to individuals sensitive/ complex circumstances? i.e. vulnerable person

The 3 categories of identified data – Octavo staff, schools staff and pupils (SEN) – will contain sensitive information as it includes personal information:

- related to pupils, specifically children who have special educational needs, including needs and health assessments;
- related to the full range of staff HR records.

This information will include Special Category Data:

	<ul style="list-style-type: none"> • Race and ethnic origin; • Religious or philosophical beliefs; • Health data; and • Data related to sexual preferences, sex life, and/or sexual orientation.
<p>What information is being used?</p> <ul style="list-style-type: none"> - Consider the nature of this information E.g. Child's social care file 	<p>SEN Pupils information is predominantly being is used to assess pupils needs, and complete/monitor Education, Health & Care Plans (EHCPs) and related activities, such as SEND tribunals.</p> <p>Octavo staff information cover the full employment records of staff, including: pay and conditions, DBS, absence, contact details, competency and conduct.</p> <p>Schools staff information cover specific services that schools purchase from Octavo. This includes governor services, HR, teacher recruitment and IT. Whilst individual schools hold the staff employment records, Octavo hold specific sensitive information in relation to the service they are providing such as Governor recruitment information, new teacher probation monitoring reports, HR disciplinary matters.</p>
Does it include special category or criminal offence data?	<p>Staff records will include DBS checks, which may contain details of criminal offences.</p> <p>Pupil records may also contain special category information. However, the existing arrangement is that relevant Octavo staff access, process and store pupil information on Council systems using Council hardware, so there will be no change to these arrangements.</p>
Can an individual be identified easily from the information?	Yes. Both staff and pupil records will include identifiable information, including names, addresses, date of birth and contact details.
What is the potential impact on privacy of this information?	There is a risk that information about an individual is shared with people who do not have

Appendix 2

Information Management Team: **Data Protection Impact Assessment**
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<ul style="list-style-type: none"> - <i>What are the risks/ impact to an individual if this information was lost, stolen or manipulated?</i> - <i>E.g. could it be sold?</i> 	<p>a legitimate need to know, leading to harm and distress to the individual, reputational damage and possible enforcement action against partner agencies as well as loss of confidence and trust.</p> <p>These risks will be mitigated by:</p> <ul style="list-style-type: none"> • Legal advice has been sought to establish information/GDPR considerations for the insourcing of Octavo. This advice will then be used to formulate a more detailed implementation plan. • Review of Octavo information processes and systems, including any required alignment to Council systems. • Ensuring the safe migration of information from Octavo to LA, where it is necessary and in accordance with GDPR/legal advice.
<p>Will this change the manner in which we handle, use or protect this information? <i>e.g. should it be encrypted?</i></p>	<p>The main project focus (and therefore risk management) is related to the identification of Octavo sensitive information which needs and can be transferred from Octavo to the LA and then the safe migration of this information to existing Council systems – Sharepoint, My Resource and Capita One/Synergy.</p> <p>Advice and support has been requested from colleagues in Digital to enable the secure migration of this data. This is included within the Project Plan and identified as a risk in the Project Risk Register.</p> <p>It is not intended or envisaged that any new LA systems or processes will need to be adopted for the storage, access or processing of this information.</p>

3 Consultation process**Consider how to consult with relevant stakeholders.**

When did you consult individuals?	<p>Consultation with internal stakeholders during de-commissioning process and in-sourcing decision making took place from April-19 to Oct-19, and continues.</p> <p>The proposal to de-commission went to the Contracts and Commissioning Board (CCB) process, with sign off by directors of Legal, HR, Commissioning & Procurement, and appropriate Lead Members in April-19.</p> <p>Schools have been consulted on the insourcing via their membership of Croydon Head teachers Association (CHTA) and in their capacity of having Octavo Board Members leading up to the Members vote which took place in Oct-19. They have also been briefed at head teacher meetings.</p> <p>Octavo staff have been consulted via staff briefings, team and 1-2-1 meetings conducted in autumn-19. They also have representation on the Octavo Board. Formal consultation will continue during the TUPE process.</p> <p>The LA, CHTA and Octavo Staff, in their capacity as Members of Octavo Partnership, voted unanimously in favour of the proposal to insource Octavo services and dissolve the Company in Oct-19.</p>
How did you consult individuals?	As above
If not explain why it is not appropriate.	N/a
Who else within the organisation have you consulted with?	Our internal Octavo Steering group includes representation from Education, Legal, HR, Finance and Commissioning. As we move into the overall project cycle, IT has now been invited to join this group effective 25 th Nov-19.

	A meeting was held with Janine Sheridan and Dave Briggs in Nov-19 regarding the in-sourcing project and potential IT implications
Do you need to speak with your processor to assist?	Yes, frequent liaison will be required between the LA and Octavo between now and the 1 st April 2020 to ensure compliance in relation to migration of information.
Do you plan to consult information security experts or any other experts?	<p>External legal was instructed on the 7/11/19 on a range of insourcing project matters, including information management/GDPR. A full report is to be provided.</p> <p>The above legal advice will inform if/what expert support is required.</p> <p>We are also recommending that Octavo seeks their own advice.</p>

4 Assessment of necessity and proportionality of data usage

What is your lawful basis for processing?	See our published Privacy Notices and Information Sharing Agreement (ISA) with schools (attached)
Is consent being relied upon to share the information? Has explicit consent been obtained? Are data subjects able to opt out from giving consent?	<p>In terms of pupils this is explained in Privacy Notice for Education and Youth Engagement Service and the attached ISA.</p> <p>In terms of staff this will be both Consent and in our capacity of employer.</p> <p>Therefore both Consent and processing in support of a 'Public task' (that is the processing is necessary for you to perform a task in the public interest or official functions, and the task or function has a clear basis in law) will take place.</p>
Does the processing actually achieve your purpose?	Yes
How will the information be collected? Verbally, forms, intranet, interview, 3 rd party, anonymous)	<p>This DPIA relates specifically to the secure migration of permissible information from Octavo to the LA.</p> <p>Identification of information permitted to be transferred, any specific consent required and subsequent methodology for this migration will be identified and implemented as part of the project.</p>

Is there another way to achieve the same outcome?	No
How will the information be used? <i>e.g. to write a report</i>	The information will be used: <ul style="list-style-type: none"> - to assess and intervene with Education to achieve better outcomes for children and families; and - meet our obligations at an employer.
Do the individuals know and understand how their information will be used? If there are changes to their information does the privacy notice need to be amended?	Yes Covered with Privacy Notices, Information Sharing Agreements and HR employment policies (which will be part of TUPE process)
How will it be stored, kept up to date and disposed of when no longer required? <i>e.g. stored in locked cabinet/securely shredded</i>	Migrated information will be stored in existing council systems and retained in accordance with Council retention schemes. Octavo is responsible for ensuring safe destruction of any information which is not required to be kept. We have advised Octavo to seek their own legal advice on a range of matters, including information management. Legal advice has been requested in relation to liability for any data breaches which occur prior to dissolution, but disclosed after the company has dissolved.
How will you ensure data quality and data minimisation?	Covered with BAU processes
Who will have access to the information within LBC? - <i>Include approximate number of users</i>	Any pupil data will be held on Council systems (Capita One, Synergy, Liquid Logic and Sharepoint) with associated access requirements. Staff information will be held on HR systems with associated access requirements.
Are there new or significant changes to the way we manage, use, handle or collect this information? - <i>Include any identified concerns for the individuals, would these changes heighten risks involved</i>	No
Will individuals within an existing database be subject to new or changed handling? - <i>If yes amendments need to be made to the privacy notice and these individuals need to be informed.</i>	No

Appendix 2

Information Management Team: **Data Protection Impact Assessment**
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What are the internal arrangements for processing this information? <i>e.g. number of staff who will have access</i>	Business as usual Staff data – Via My Resources by relevant HR staff and line managers Pupil data – No change, currently by approved users on Capita One, moving to Synergy in April 2020
How will the information be updated? <i>e.g. monthly check</i>	Business as usual Staff data – as per My Resources arrangements Pupil data – no change as already on system
Does the project involve the exchange of information outside of the UK and are there set standards for how the information will be treated? How will you safeguard international transfers?	Data will be stored in the UK.
How will you prevent function creep?	Corporate data protection procedures and training are provided to all new users on use of My Resources and Capita One/Synergy

5 Assessment of the risks to the rights and freedoms of data subjects

You must describe the source of risk and the nature of potential impact upon individuals and identify any additional measures to mitigate those risks.

5a Security

Who will be responsible for the control for this information?	Data migration – Project Manager Once migrated, relevant Business Systems Teams will be responsible, typically: <ul style="list-style-type: none"> Employee Information – My Resources Team Pupil data – Business Systems Team (Education)
How will the access to this information be controlled?	Business as usual – existing Council systems For staff moving from Octavo to the LA, appropriate access rights and training to any information systems will be as per new starter procedures for both My Resources and Capita One/Synergy
Is the data correctly managed to reduce the risk of collateral intrusion to the data subject?	Business as usual – existing Council systems

	For staff moving from Octavo to the LA, appropriate access rights and training to any information systems will be as per new starter procedures for both My Resources and Capita One/Synergy
Are there adequate provisions in place to protect the information? If so what are they? <i>e.g. Process, security</i>	Business as usual – existing Council systems For staff moving from Octavo to the LA, appropriate access rights and training to any information systems will be as per new starter procedures for both My Resources and Capita One/Synergy

5b Sharing

Who is the information shared with, why are we sharing the information with this organisation?	Information is being shared by Octavo to the LA for the purposes of insourcing of Octavo services and functions to Croydon Council to ensure we have relevant information to enable service continuity.
What purpose does the information we are sharing have to the third party? - <i>Ensure that we only share relevant information and not excessively</i>	Information is being shared by Octavo to the LA for the purposes of insourcing of Octavo services and functions to Croydon Council to ensure we have relevant information to enable service continuity.
Who will have access to the information, externally? - <i>Include approximate number of users</i> - <i>Describe any sharing arrangements and what the level of access is. It may help to produce a diagram to show the data flows.</i>	Nobody
How will it be transmitted to third parties and when? How often?	One-off migration of information via secure methodology, to be determined by experts support from Digital Service.
Is there a data sharing agreement in place?	Included within contract for services between Octavo and Croydon Council. This contract was drawn up with legal.
At what stage will the information be transferred?	By 1 st April 2020

5c Identified Risks and assessment:

You should take into account the sensitivity of the information and potential harm that inappropriate disclosure or use of the information could cause to any individuals concerned. You should also consider the reputational loss to the Council and the potential for financial penalties being imposed by the ICO.

To assess the level of risk you must consider both the **likelihood** and the **severity** of any impact on individuals. A high risk could result from either a high probability of some harm or a lower possibility of serious harm.

The severity impact level and likelihood should be scored on a scale of 1 to 10 with 1 being low severity and 10 high. The two scores should be **added** together. The RAG status is derived from the following scale:

Score:

- 15 to 20 = Red (High)
- 8 to 14 = Amber (Medium)
- Below 8 = Green (Low)

To be completed by Project Sponsor

Risk Identified	Severity of Impact	Likelihood of harm	Overall RAG rating
Provider (Octavo) or Council is unable to meet timescales to enable secure information migration to take place by the 1 st April 2020 Mitigation: Availability of Octavo systems for a set, agreed period after 1 st April 2020	3	3	6
Information breach during migration by either/both parties	6	10	16

Appendix 2

Information Management Team: **Data Protection Impact Assessment**
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6 Identify measures put in place to reduce risk.

You must now identify additional measures you could take to reduce or eliminate any risk identified as medium or high risk in step 5.

To be completed by the Project Sponsor

Risk Identified	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure Approved
Information breach during migration by either/both parties	Legal instructed by LA to advise on information management implications of insourcing. LA to recommend Octavo takes relevant advice. Project Manager to agree with Digital Team/IT experts to agree and implement a plan for the secure migration of permissible information	Reduced	Low	Yes / No

Appendix 2

Information Management Team: **Data Protection Impact Assessment**
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Sign off and Record sheet

Item	Name/date	Notes
Measures approved by:		
Residual risks approved by:		
DPO advice provided: See DPO Comments below	Nicola Thoday Corporate Solicitor on behalf of Sandra Herbert, Data Protection Officer and Head of Corporate Law and Litigation 2 January 2020	In light of the information contained in (1) the whole of this DPIA, (2) especially p10-11, and (3) the intentions to continue to work on the Information Governance issues: I am happy for this project to proceed.
Consultation responses reviewed by:		
DPIA to be kept under review by:		

If you require further guidance to complete this DPIA please contact:

Information Management Team (IMT)

Ext: 47777

Email: information.management@croydon.gov.uk

Data Protection Officer

Email: DPO@croydon.gov.uk

DPO Comments

2 January 2020

The project is to dissolve the Octavo Partnership.

I was pleased to see that:

- (1) There is a high level project plan which includes a Information Governance/GDPR section. If you wish I am happy to consider/advise on this?
- (2) The Council is considering what information is 'permissible' or 'necessary' to transfer, thus not collecting excessive information.

- (3) There is a specific focus on handling special category information and on information security.

Other comments (in no particular order):

1. If it doesn't already, it would be useful if the project plan included a data flow section – the DPIA mentions that you have already identified the personal data involved, but we also need to consider what is necessary to transfer and how this is securely transferred and where it will be held.
2. The existing Contract needs to be checked to ensure it includes appropriate terms regarding the transfer to information and the deleting copies of information it may have.
3. Given that the Octavo Partnerships holds a vast amount of personal information (and possibly special category information). I suggest that the Council allocates a specific member of staff to be responsible for the Information Governance i.e - ensuring that all the Personal Information is handled appropriately during and after the dissolution. It will be a big project because of the number of entities in the Partnership and the volume and sensitivity of the information. However, it will mitigate risks that the ICO have previously fined on, relating to disposal and transfer of information.
4. I note that there are various TUPE issues - connected to this are various requirements regarding information that must be shared about, and given to individuals. If you have any queries about this, HR are well placed to assist, or you are welcome to contact me (or Richard Roberts my colleague- Employment Solicitor).

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REPORT TO:	CABINET 20 January 2020
SUBJECT:	Feedback from the monitoring visit in October 2019 by Ofsted to Croydon's Early Help Services Children's Social Care service
LEAD OFFICER:	Robert Henderson, Executive Director for Children, Families & Education
CABINET MEMBER:	Councillor Alisa Flemming, Cabinet Member for Children, Families and Education
WARDS:	All
CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON <p>This report focuses on progress achieved that will ensure that all Croydon's children live a happy, healthy life, free from harm and that they have every opportunity to thrive and become fulfilled adults.</p> <p>Corporate Plan for Croydon 2018-2022</p>	
FINANCIAL IMPACT <p>Investment of £22.2m has been allocated to base budgets in 2018/19 and 2019/20 to support the drive to improve children's services. This is in addition to transformation funding of £20m over the same period.</p>	
FORWARD PLAN KEY DECISION REFERENCE NO.: Not a key decision	
<p>The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below</p> <p>1. RECOMMENDATIONS</p> <p>The Cabinet is recommended to</p> <p>1.1 Note the feedback from Ofsted following the seventh monitoring visit to children's social care and early help in October 2019.</p>	

2. EXECUTIVE SUMMARY

- 2.1 This report advises cabinet of the feedback following Ofsted's seventh and final monitoring visit to children's services in October 2019.

3. KEY OFSTED FINDINGS

- 3.1 Following the Ofsted inspection in 2017 which judged children's services as inadequate, Ofsted completed the seventh and final monitoring visit in October 2019 and published a letter summarising their findings on 18th December.

The letter is included at appendix 1. Publication was delayed until after the December 2019 general election.

3.2 The visit focused on two areas:

- Services for children who receive support through a child protection plan or a child in need plan.
- Services offered to children who have a plan for adoption

3.3 Inspectors concluded that focused, dynamic leadership was continuing to drive rapid progress in the quality of services for children in Croydon. Improvements were seen in almost all the areas of practice reviewed, and progress previously seen had been sustained and in some areas was accelerating.

3.4 A comprehensive understanding of service strengths and challenges was found to underpin senior managers' plans for further improvements. Regular and extensive audit activity by senior leaders and managers provided a clear and direct line of sight into practice. This meant they were fully aware of the continuing variability in the quality of practice.

3.5 Inspectors looked at a small number of cases of children with a plan for adoption. Recent improvements could be seen in this area, however inspectors noted that more work was needed to secure permanent homes for children as quickly as possible, with more creative, child-centred planning taking place to find families.

3.6 Significant progress in supervision and support for front line staff was reported, and staff spoken to by inspectors felt well-supported, with manageable caseloads that allowed for better quality day-to-day work with children and families.

3.7 Although permanent recruitment of frontline staff continues to be a challenge inspectors found positive signs of progress with a stable, permanent management team leading and supporting the improvements in social work practice with children and families.

3.8 Inspectors agreed with senior managers' assessment of areas that require further improvement, including a determined focus on raising the quality of practice to a consistently good level, and tackling the legacy of drift and delay in casework across the service that has left some children and families subject to statutory intervention for too long.

4. NEXT STEPS

4.1 A standard inspection under the inspection of local authority children's services (ILACS) framework is required to overturn an inadequate judgement. This inspection is expected in the first quarter of 2020.

- 4.2 Planning and preparation for the standard inspection has been underway for some time as the programme of monitoring visits drew to an end. Specific readiness activities are taking place at a number of levels, however the most effective preparation continues to be focusing on getting the basics right consistently, talking about and planning for consistently good quality practice, and working with families and children within the systemic framework across the whole service.
- 4.3 Service improvement plans are in place for all services across early help and children's social care, and for the support and infrastructure services such as finance, commissioning, workforce and HR, digital services and business support. Monthly check and challenge meetings are chaired by the Executive Director Children, Families and Education and Executive Director Resources to continue to drive improvements at pace.
- 4.4 Across the council a monthly programme board, chaired by the Chief Executive provides support and challenge across the improvement plan. In addition to this a monthly improvement board has been in place since Autumn 2017 with an independent chair and mixed membership of partners, members, our improvement partner, Camden, senior officers and a DfE representative.

5 PRE-DECISION SCRUTINY

- 5.1 Although this report has not gone through pre-decision scrutiny, as it is not a decision, the children's improvement journey and plan is subject to regular review and scrutiny in the following forums:
- Child and Young Persons (CYP) Scrutiny Committee
 - Children's Improvement Board (with an independent chair, our improvement partners Camden, and cross party political membership)
 - Children's Improvement Programme Board (chaired by the Chief Executive)
- 5.2 The judgement letter from Ofsted was included in the papers for the Children and Young People's Scrutiny Committee in January 2020 and has also been discussed at the Children's Improvement Board.

6 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 6.1 Significant additional resources have already been identified as part of the 2018/19 and 2019/20 Children's Social Care budgets; in particular total additional growth of £22.2m addressing pressure in a range of areas, most of which feature in the improvement plan. This is in addition to £0.7m in Resources (Business Support base budget) to ensure the staffing structure and budget support both the level of demand being experienced and also the areas of focus for improvement.
- 6.2 Additional one-off investment funding via the Council's Transformation Reserve is also being used to support the implementation of the Children's Services

improvement plan. The estimated cost of this plan over the three years since the Ofsted inspection is expected to be £20m (of which £3.2m and £9.8m was spent in 2017/18 and 2018/19, respectively).

- 6.3 The level of one-off funding is based on a detailed assessment of the costs associated with the improvement plan and the improvements that will be achieved as a result of the investment have also been identified and are regularly monitored.

Approved by Kate Bingham, Head of Finance, Children, Families and Education on behalf of the Director of Finance, Investment and Risk and Section 151 Officer

7. LEGAL CONSIDERATIONS

- 7.1 The Head of Social Care and Education Law comments on behalf of the Director of Law and Governance & Deputy Monitoring Officer.
- 7.2 The framework for Ofsted inspections of Children's Services is set out in sections 135-142 of the Education and Inspection Act 2006 ('the Act') and associated Employment and Education Act 2006 (Inspection of Local Authorities) Regulations 2007 ('the Regulations'). Croydon was inspected from 20th June to 13th July 2017 under Ofsted's "Framework and evaluation schedule for the inspections of services for children in need of help and protection, children looked after and care leavers and Reviews of Local Safeguarding Children's Boards" ('the SIF'), which sets out a single assessment framework for assessing local authorities during inspections conducted under section 136 of the Act. Local authorities are graded outstanding, good, requires improvement or inadequate in each of the areas inspected. Ofsted introduced a new "Framework, evaluation criteria and inspector guidance for the inspections of local authority children's services" in November 2017 ("the ILACS"). This is a more flexible regime and uses information held about each local authority to inform decisions about how best to inspect that authority. Since the framework for inspection was published in 2017 it's been updated several times & brought all inspections under the ILACS framework.
- 7.3 If the outcome of the subsequent re-inspection is better than inadequate, Croydon will then begin to follow the pathway for local authorities which either require improvement or are graded good.

Approved by Doutimi Aseh, Head of Social Care and Education Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer.7.3

8. HUMAN RESOURCES IMPACT

- 8.1 The work of the improvement board has provided insight and support to the workforce recruitment and retention challenges. The inclusion of the staff reference group's representatives has been a positive source of feedback and

a strong sign of the value placed in our workforce to be a key stakeholder in change.

Approved by Sue Moorman, Director of Human Resources

9. EQUALITIES IMPACT

- 9.1 Croydon has a diverse population of children and young people. Children and young people from minority ethnic groups account for 57%, compared with 30% in the country as a whole. The proportion of children and young people with English as an additional language across primary schools is 44% (the national average is 18%).
- 9.2 An equalities analysis was completed in January 2019 to underpin the review of the Children's Improvement Plan over 2018-19. The analysis has been reviewed as part of the current improvement plan refresh. It is still a live document and as such not all actions have completed the analysis continues to provide guidance to ensure that equality and diversity considerations are part of the process in delivering improvement work. The analysis will be reviewed and updated as required.
- 9.3 One issue identified in the January 2019 analysis was that social workers' planning and recording in relation to inequalities had been inconsistent, which can result in plans for children's care not fully reflecting their needs. The recently adopted systemic practice framework for early help and children's social care places an explicit responsibility on staff to consider stresses such as poverty, racism, homophobia, sexism, and additional needs such as disability in their work with families. The last monitoring visit (October 2019) noted some measurable improvements, with many children benefiting from thoughtful and persistent child-centred work that is making a difference to their lives. Children's views and voices were found to increasingly inform the work undertaken. However, inspectors also noted that this is not yet consistently good across all areas.
- 9.4 Our own quality assurance activity also tells us that practice is improving but that there is more to do to improve consistency. Learning and development for front line managers including Team and Assistant Team Managers will draw on our systemic framework to focus on their role in overseeing casework and guiding staff to achieve the best outcomes for children. The framework includes consideration of the 'social graces' such as gender, race, age, ability, culture, ethnicity, sexual orientation and spirituality, amongst others, and how these must be considered when planning interventions with children and families. These will be monitored on a twice-yearly basis as part of Practice Week.

Approved by Yvonne Okiyo, Equalities Manager

10. ENVIRONMENTAL IMPACT

- 10.1 None

11. CRIME AND DISORDER REDUCTION IMPACT

11.1 None

12. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

12.1 Report authors are required to provide a brief explanation of the reasons for the recommendations. These will be incorporated in the minutes of the meeting and the record of the decision.

13. DATA PROTECTION IMPLICATIONS

13.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

NO

Approved by: Robert Henderson, Executive Director, Children, and Families and Education

CONTACT OFFICER: Kerry Crichlow, Director Children's Improvement Programme
07957 228818

APPENDICES: Appendix 1 – Croydon Children's Services
Monitoring Visit October 2019

BACKGROUND DOCUMENTS: None

18 December 2019

Robert Henderson
Executive Director, Children, Families and Education
London Borough of Croydon
8 Mint Walk
Croydon
London
CR0 1EA

Dear Mr Henderson

Monitoring visit to Croydon local authority children's services

This letter summarises the findings of the monitoring visit to Croydon local authority children's services on 16 and 17 October 2019. The visit was the seventh monitoring visit since the local authority was judged inadequate in September 2017. The inspectors were Louise Hocking and Brenda McLaughlin, Her Majesty's Inspectors.

Concerted and dynamic leadership continues to drive rapid progress in the quality of services for children in Croydon. Improvements were evident in almost all areas of practice reviewed during this monitoring visit. Progress over the last eight months has been sustained and is continuing to gain further momentum.

Areas covered by the visit

During this visit, inspectors reviewed the progress made in the areas of:

- Services for children who receive support through a child protection plan or a child in need plan.
- Services offered to children who have a plan for adoption.

A range of evidence was considered during the visit, including electronic case records and a review of casework alongside social workers. In addition, we spoke with managers and senior managers. We reviewed performance data and management information and a range of documents relating to the improvement journey and service development.

Overview

The leadership provided by the executive director and the director of early help and children's social care continues to drive progress at a sustained and rapid pace. This is reaping considerable rewards, and services for children are consistently improving.

Almost all children receive at least a reasonable level of service, and some practice is strong. Work with, and for, children is increasingly positive and purposeful, and staff are becoming more confident in their practice. Senior leaders and managers undertake regular and extensive audit activity to understand the experiences of children, and they have a clear and direct line of sight on practice. They are fully aware of the variability that remains in the quality of practice. This includes a group of children and families in receipt of child protection services who previously experienced poor practice, including drift in planning, and who are in need of skilled and purposeful attention. Appropriate action is now being taken to address this.

Findings and evaluation of progress

This monitoring visit predominantly focused on services for children with a child protection or child in need plan in the social work with families service. This is a large service, comprising 13 teams, which undertakes a wide range of work, including child in need, child protection, public law outline pre-proceedings work and care proceedings, and also supports some children in care. The scale and nature of the service, alongside the degree of risk being managed and the legacy of poor practice for some children, present some challenges. These challenges are clearly understood by the responsible managers.

Progress is evident in all areas of practice in this service. Many children benefit from thoughtful and persistent child-centred work that is making a difference to their lives. Children's views and voices increasingly inform the work undertaken. Direct work and positive engagement with children and families are evident in most cases, although this is not always fully reflected in the written records. Social workers know children well, and speak confidently about their role.

Children on either a child protection or a child in need plan are now visited more regularly, and social workers are more confident in the work that they are undertaking. All children have a plan in place, and these are appropriately developed through core group meetings. Some cases include strong evidence of partnership working. For some children, the written plan is too generic; these plans need to be clearer and more targeted to the specific areas of concern.

While most measures, including the frequency of visits and the review of plans, show significant improvement, variability and inconsistency remain. Progress for some children has been negatively affected by staff turnover and a legacy of drift. As a result, a small number of children have spent an extended period of time on child protection plans without purposeful work being undertaken, resulting in little or limited impact. Recent work is making a difference, and progress is beginning to be seen for some of these children. These cases demonstrate that thresholds for continuing or ending child protection plans have not been applied effectively. Managers and child protection chairs need to ensure that thresholds are clearly understood and that children only remain on a child protection plan when the relevant thresholds are met.

The process of cases being transferred from the assessment service to the social work with families service is not working smoothly for all children. Parallel planning does take

place, but the permanency planning meetings are not yet providing an effective forum for assisting social workers to think through the options and actions for robust permanency planning at the earliest stage.

Concerted oversight by senior leaders and managers has seen a reduction in the number of children on a child protection plan or child in need plan, as well as in the amount of pre-proceedings work being undertaken under the public law outline. The director of early help and children's social care is ensuring more robust decision-making at important thresholds. This includes chairing a weekly care panel, overseeing decisions to initiate care proceedings and providing oversight for children who have been on a child protection plan for more than 12 months.

Inspectors looked at a small number of cases of children with a plan for adoption. Casework shows that some improvements have been made to this area of practice. Active family finding is taking place, and potential matches are being pursued. Children, particularly young children, are being successfully placed in their adoptive homes. Managers have carried out a recent audit of cases for children who have a plan for adoption, and ensure an active oversight of adoption practice through file checks by the head of service. However, work is not consistently timely for all children. Permanency planning meetings are not yet driving planning with the necessary urgency or focusing sufficiently on assisting social workers with creative solutions to family finding.

Staff report being very happy working for Croydon. They are well supported and now have manageable caseloads. Staff commented very positively on the progress under the current leadership, describing a culture of open communication and a dedication to positive change. Staff valued the accessibility, availability and feedback from senior leaders and managers alike. The current average caseload in the social work with families service is just over 14, which is below the local authority's target of 16 for the service. Social workers have the time and space to undertake work with children, and an environment has been created to embed consistently positive work. Components of a learning culture and organisation are evident.

Significant progress has been made in supervision practice. Supervision now takes place regularly and is clearly recorded. Reflection and analysis are increasingly evident, although there is some variation in the recording of decisions and rationale. Staff value the reflective space of group supervision and commented positively on the range of training and development opportunities available to them. There are very positive early signs of the implementation of the recently launched systemic practice model, with some positive impact seen for children as a result of consultations between social workers and the systemic lead.

Senior managers have a comprehensive understanding of service developments, and they regularly and accurately update written self-assessments. The improvement plan is also regularly updated and is used effectively as a live document to measure progress and change. The plan is underpinned by an accurate analysis of strengths, improvements and challenges. Senior managers take prompt and concerted action to

tackle the challenges, demonstrating their determination to ensure positive and sustained improvements to outcomes for children.

Performance management systems have been considerably strengthened, and they provide leaders with reliable data on performance. These systems are underpinned by a comprehensive quality assurance framework and an extensive programme of audits, practice weeks, file reviews and appreciative inquiry reviews. Audit activity is effective in supporting the wider performance management and quality assurance framework. Impact can be seen through the local authority grading of casework that accurately demonstrates steadily improving practice generally, and through individual post-audit casework. An agreed process for 'closing the loop' to ensure that required actions are completed after all audits would strengthen this practice further.

Staff recruitment continues to be a challenge in Croydon, despite the persistent, widespread and creative efforts of the leadership team. The staff vacancy rate is over 40%, and some services, including the social work with families service, have vacancies. However, there are positive signs of progress and a stable, permanent, management team has been established. Agency staff are well supported and caseloads remain manageable.

In summary, senior managers are making consistent improvements, which are continuing to gain momentum. Senior and middle management teams are well placed to embed the changes and to ensure greater consistency in practice. The overall improvements to compliance, together with signs of strong practice, mean that they can now focus on improving the consistency of the quality of practice for all children.

I am copying this letter to the Department for Education. This letter will be published on the Ofsted website.

Yours sincerely

Louise Hocking
Her Majesty's Inspector

For General Release

REPORT TO:	CABINET 20 JANUARY 2020
SUBJECT:	Education Estates Strategy
LEAD OFFICER:	Robert Henderson – Executive Director, Children, Families and Education Shelley Davies – Interim Director, Education and Youth Engagement Denise Bushay – Head of Service, School Place Planning and Admissions
CABINET MEMBER:	Councillor Flemming, Cabinet Member for Children, Young People and Learning
WARDS:	All
CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON Corporate Plan 2018 - 2022 The recommendations in this report are in line with the new operating model – ‘getting the basics right for residents’ and will contribute to the delivery of the following key priority / outcome: ‘Our children and young people thrive and reach their full potential: <ul style="list-style-type: none"> • Children and young people in Croydon are safe, healthy and happy, and aspire to be the best they can be • Every child and young person can access high quality education and youth facilities • Ensure there are high quality school places for Croydon’s increasing numbers of children and young people. Corporate Plan for Croydon 2018-2022	
FINANCIAL IMPACT The overall cost of the Education Capital Programme is estimated at £37m over the period 2020/21 – 2021/22 as set out in Appendix 2 and includes the ESFA funded new special free school - Addington Valley Academy (on the Timebridge site). This project is proposed to be funded by the ESFA at a budget of £15.112m with the Authority contributing an additional £558,000.	
FORWARD PLAN KEY DECISION REFERENCE NO.: 0120CAB The notice of the decision will specify that the decision may not be implemented until after 13.00 hours on the 6th working day following the day on which the decision was taken unless referred to the Scrutiny and Overview Committee.	

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

The Cabinet is recommended to

School Admission

- 1.1 agree to recommend to full Council that it determine the proposed Community schools' Admission Arrangements for the 2021/22 academic year (Appendix 1);
- 1.2 approve the continued adoption of the proposed Pan London scheme for co-ordination of admissions to Reception and Junior schools – Appendix 1a; and adoption of the proposed Pan London scheme for co-ordination of admissions to secondary schools – Appendix 1b.

School Place Planning

- 1.3 Approve the Capital Programme Budget summary (appendix 2).

Special Educational Needs and Disability(SEND)

- 1.4 Delegate decision-making to the Lead Member, Children, Young People and Learning, and the Executive Director of Children, Families and Education in relation to proposals to change in the age range of St Giles School to include a nursery provision and to provide a coherent pathway for children with PMLD and physical, sensory medical needs through the provision of St Giles School expertise across the pre-school and school age range.
- 1.5 Note the funding previously approved by cabinet for Austic Spectrum Disorder (ASD) Enhanced Learning Provision places from the 2019/20 programme has been deployed to improve facilities at Meridian (£100K) and £50K for Castle Hill to increase places and provide suitable facilities.
- 1.7 Approve the proposal to undertake quality assurance and feasibility studies of special schools Red Gates; St Giles and Priory Schools to enable options to be set out which address current issues of suitability, safeguarding risks and the capacity of these education facilities to meet the special educational needs of children and young people.

Mainstream / Community schools

- 1.8 Note that there are no proposed changes to the 3 year (2019/20 to 2021/22) School Place Supply Strategy agreed at Cabinet on 19th September 2019.

Early Years

- 1.9 Note the 2019 Childcare Sufficiency Assessment report – Appendix 3.

Alternative Provision / Pupil Referral Unit (PRU)

- 1.10 Note the update on Alternative Provision / PRU.

1.11 School Maintenance and Compliance

Approve the proposed Schools' Maintenance Plan (Appendix 4) for 2020/21, and funding of £2m plus an additional £882,000 for 2020/21. This proposed additional £882,000 is to be slippage from the current budget to assist with the additional maintenance work required to be undertaken due to the ageing of the educational estate; and

- 1.12 Delegate authority to the Executive Director, Children, Families and Education to vary the proposed Schools' Maintenance Plan to reflect actual prices and new urgent issues that may arise, including authorising spend against the allowance

for emergency and reactive works. The Executive Director, Children, Families and Education shall report back to members in respect of any exercise of such authority.

2. EXECUTIVE SUMMARY

2.1 This report outlines the Council's Education Estates Strategy for three stages of education: Early Years, Primary and Secondary, including Pupil Referral Unit and Special Educational Needs and Disability. It covers: School Place Planning; School Admissions; and Schools' Maintenance and Compliance.

2.2 School Admission

Admission authorities, including local authorities, are responsible for admissions and must act in accordance with the School Admission Code, and the School Admission Appeals Code. All admission authorities must determine (i.e. formally agree) admission arrangements every year, by 28 February. The Council is also responsible for having in place a scheme for coordinating admission arrangements. The admission arrangements are part of the policy framework and are therefore reserved to full Council for decision.

2.3 School Place Planning

In accordance with the Education and Inspections Act 2006 ("EIA") the Council has a statutory duty to "secure that sufficient schools for providing— (a) primary education, and (b) secondary education are available for their area" as well as to "secure diversity and increase opportunities for parental choice when planning the provision of school places" in the borough. The Council also has statutory duty to manage a potential surplus of schools places.

2.4 Special Educational Needs and Disability

Croydon's Special Educational Needs and Disability school place planning is informed by the Council's Dedicated Schools Grant Recovery Plan and 0-25 SEND Strategy. Croydon's plans to provide local education pathways for children and young people with SEND to support young people in living fulfilled lives and achieving independence in adulthood. Provision of suitable facilities underpins effective and coherent specialist education provision.

2.5 Consultation on extending the age range of St Giles School so that there is a change to provider arrangements for Rainbow specialist nursery from September 2020. The intention is to provide efficient and effective specialist provision and a coherent pathway for children whose specialist education will be with St Giles School. There are no cost implications.

2.6 Options for the long-term provision of specialist education for children with Profound and Multiple Learning Difficulties (PMLD); Physical, Sensory Medical or Severe Learning Difficulties (SLD) to be informed by feasibility and quality surveys of Priory; St Giles and Red Gates Schools. Increased places and provision of suitable education in Enhanced Learning Provision (ELP) in mainstream schools for young people with autism is being addressed in Meridian and Castlehill Schools.

2.7 Mainstream / Community Schools

The Education Estates supply strategy agreed in September 2019 will be further developed following consultation and a decision on the Local Plan in order to assess the likely number of pupils that new housing developments will generate and the number of additional school places required.

2.8 Early Years

Local Authorities are required to report annually to elected council members on how they are meeting their duty to secure sufficient childcare, and make this report available and accessible to parents. Croydon's Childcare Sufficiency Assessment 2019 report indicates that there are sufficient early years and childcare places for families. The Sufficiency Assessment report is attached as Appendix 2.

2.9 Alternative Provision / Pupil Referral Unit (PRU) (*Mike to complete*)

The Council has a duty to make arrangements for the provision of suitable education at school or otherwise for each child of school age who for reasons of illness, exclusion or otherwise would not receive it unless such arrangements were made.

2.10 School Maintenance and Compliance

The Council is the employer for community schools, community special schools, maintained nursery schools and pupil referral units and is responsible for larger condition and maintenance works. It has a duty to ensure that appropriate arrangements are in place to monitor and review any preventative and protective measures that have been implemented. The Schools' Maintenance Plan (Appendix 4) contains the planned repairs and maintenance programme for 2020/21.

3. DETAIL

3.1 School Admissions

The Council is the Admission Authority for Community schools as set out in Appendix 3 and is therefore responsible for determining the Admission Arrangements for these schools. Where the admission arrangements have not changed from the previous year there is no requirement to consult, subject to the requirement that admission authorities must consult on their admission arrangements at least once every 7 years. Croydon is not proposing any significant changes to the previously agreed admission arrangements, barring minor changes to comply with the Pan-London protocol, which do not require consultation, as below:

- evidence parents/carers need to provide for their child's home address
- process of overseas school applications – the word 'overseas' has been replaced with 'outside England'

3.2 Admission authorities must determine admission arrangements for entry in September 2021 by 28 February 2020. The proposed Admission Arrangements for Community schools include the criteria by which schools places are allocated when a school receives more applications than places. There are no proposed change to the admission arrangements that have been previously determined in January 2019.

- 3.3 The Council is also responsible for having in place a scheme for coordinating admission arrangements. Croydon has participated in a Pan London arrangement for the Co-ordinated Admissions rounds for both primary and secondary applications for several years.
- 3.4 The annual school admissions arrangements are part of the Council's policy framework and as such require determination by the full Council. The Council is required by statute and regulations to approve its admissions policies for the schools it is responsible for the 2021/22 academic year (including Published Admissions Numbers – PANs). Accordingly Cabinet is requested to recommend to full Council that it determine the proposed Admission Arrangements for Croydon's community schools for the 2021/22 academic year (Appendix 1) and adoption of the proposed Pan London co-ordination arrangements (Appendix 1a & 1b).
- 3.5 The governing bodies of voluntary aided, foundation schools and academies are their own admission authorities and therefore responsible for determining their own admission arrangements.

4. School Place Planning

Under section 14 of the Education Act 1996, every local authority (LA) has a statutory duty to provide sufficient school places for all pupils in its area. This includes the planning and reviewing of school places, securing diversity and increasing opportunities for parental choice to ensure the needs of the community are met, as well as managing surplus places.

- 4.1 Special Educational Needs and Disability (SEND)
Croydon's SEND Strategy; Dedicated Schools Grant Recovery Plan and review of specialist education funding have set the foundation for Croydon's Education Estate Strategy in relation to SEND provision. Croydon has planned to develop the coherence and effectiveness of special needs education provision 0-25 to ensure the suitability of education facilities to meet the needs of children for whom an increasing number have severe and complex special educational needs, including medical needs.
- 4.2 Extending the age range of St Giles School enables there to be effective and efficient special early years provision, Rainbow specialist nursery, with a pathway into St Giles School. Croydon's Rainbow specialist nursery provides for early years children with profound and multiple learning difficulties and medical, physical sensory needs and is based at the Children's Development Centre. The local education pathway for the majority of children attending Rainbow is St Giles Special School. St Giles Special School currently provides for children with these needs who are within the age range 4-19 years. The proposal is to consult on extending the age range of St Giles School. St Giles staff are skilled and have expertise in the development of young people with PMLD and are confident in providing care, support and teaching for these children,.
- 4.3 The Rainbow nursery contract with the current provider ends at the end of the academic year 2019/20. The Council proposes consulting on a change in the

age range of St Giles School to include nursery age range and to provide a coherent pathway for children with PMLD and physical, sensory medical needs through the provision of St Giles School expertise across the pre-school and school age range.

4.4 The construction of the new St Nicholas Primary School building is progressing according to timescale. In September 2019 the Topping Out ceremony was led by Croydon's Deputy Mayor, Cllr Maddie Henson, Deputy Cabinet Member, Children, Young People and Learning, Cllr Shafi Khan, head teacher, Nick Dry and the contractor. The new building will be open for children from April 2020 and the school's in-take will be four forms of entry from September 2020.

4.5 The Council has maintained its commitment to investing in the suitability of autism ELPs. Meridian High School autism ELP (30 places) has a need for education estates investment to provide adequately for young people's sensory needs with a breakout quiet room and sensory room. Castlehill School (46 places) has increased the number of places available for children with autism in the school's ELP by 8 places and has a need to provide adequate work-spaces and improved playground facilities. Cabinet is asked to approve the expenditure identified for 2019/20 of £100K for Meridian and £50K for Castle Hill to address the above need for improved and suitable facilities.

4.6 Initial investigation has highlighted issues in the special school estate of Red Gates School, St Giles School and Priory School with regard to the adequacy of the condition of the school fabric and the suitability of the facilities in the context of the increasingly complex needs of the children and young people placed there. Initial feasibility studies have been undertaken for Red Gates and St Giles Schools. A quality survey is due to be undertaken for Priory School. The condition of buildings and the inadequacy of capacity has necessitated in immediate and urgent capital investment to address leaking roofs (St Giles), the need for additional classrooms (Red Gates) and adequate fencing (Priory). Feasibility studies for these special schools will inform options for future decision-making.

4.7 Mainstream / Community schools

A mainstream school is a maintained school or academy which is not a special school. A Community School is a school that is controlled and run by the Local Authority (LA). The LA owns the land/building and determines the admission arrangements. Croydon has a total of 88 primary schools, of which 29 are maintained / Community schools. Non of Croydon's 23 secondary schools are maintained by the Local authority.

4.8 The Education Estates supply strategy agreed in September 2019 will be further developed following consultation and decision on the Local Plan. A key part of the strategy will be to earmark potential sites in the Local Plan for educational use. This will help to estimate / assess the likely number of pupils that new housing developments will generate and the number of additional school places required.

4.9 Early Years

Under the Childcare Act 2006 local authorities have a statutory duty to secure sufficient childcare for the needs of working parents/carers in their area. The

Council's duties around inclusion birth to five are detailed in the Children and Families Act 2014, (section 2 Childcare Act 2016).

4.10 For the purposes of this assessment the supply of formal childcare includes private day nurseries, pre-schools, schools with nursery provision, childminders (funded childminders are accredited to deliver the free entitlement on behalf of the local authority), out of school clubs and holiday clubs. In total the 698 providers offer 15,415 childcare places. Ofsted's national figures as at 31.3.19 state that the proportion of childcare providers on the Early Years Register judged to be good or outstanding was 95%.

4.11 Alternative Provision / Pupil Referral Unit (PRU)

Under Section 19 of the Education Act 1996 the Local Authority has a statutory duty to make arrangements for the provision of suitable full time education to those pupils who are unable to attend a mainstream school due to illness, exclusion or otherwise.

4.12 In this context, Alternative Provision in Croydon is provided by separate specialist providers for each of the Primary and Secondary settings, a Medical Tuition Service and the London Borough of Croydon supplement this with provision commissioned from the independent sector as required. The number of commissioned places from the Independent Sector varies according to need. All of this place funded provision is good or outstanding. The number of places available at each setting is:

- Medical 90 places
- Primary 48 places
- Secondary 190 places

4.13 School Maintenance

Local Authorities have responsibility to maintain school buildings so that they are safe, warm and weather tight and provide a suitable learning environment, including dealing with emergencies promptly and effectively and managing and procuring maintenance works efficiently. The Council is responsible for the larger condition and maintenance works in maintained schools.

4.14 The condition of some of the education estate has improved due to investment in the refurbishment of the building fabric and maintenance / replacement of electrical and mechanical equipment. However, as school buildings age, they present age related issues and the cost of maintaining them is increasing steadily. In addition, some of the buildings are nearing the end of their lives and structural issues are beginning to emerge.

4.15 The annual maintenance capital budget (appendix 4) currently stands at £2m which is sufficient to only undertake the highest ranked projects; those categorised as the worst defects and designated D1 in the condition survey report. The council retains a percentage of its annual maintenance capital budget to address unexpected and urgent works in schools. Due to the ageing condition of the buildings and the need for more urgent works to be undertaken we are seeking approval for an additional £882,000 from the current capital budget to assist with planned maintenance works.

4.16 The School's Maintenance plan (appendix 4) has been developed using information from condition surveys commissioned by the Council. These surveys are comprehensive and identify costed items across each school rated from A (good condition) to D (poor condition) as well as assessing the urgency of each (on a scale of 1 to 4, with 1 being the most urgent). The next condition surveys will be undertaken in 2020.

4.17 Asbestos Management in Community Schools

Where asbestos is present, the council will take the following steps to manage the asbestos in our schools ensuring they have the following:

- a) Management survey of asbestos-containing materials (ACMs)
- b) Assess the risks associated with ACMs.
- c) A plan for managing asbestos.
- d) Ensure staff and visitors know the risks and precautions they need to take.
- e) Keep the management of asbestos under continuous review

4.18 Statutory compliance Inspections

Both the Council and maintained schools are required to ensure school buildings are meeting the statutory standards by regularly undertaking statutory tests which includes Legionella Risk Assessment, Gas Safety Checks, Fire Alarm tests, NICEIC 5 Year Periodic Inspections, NICEIC Emergency Lighting, Fire Risk Assessment and Asbestos Management. The Council ensures that the policies and the condition of the school estate are compliant with appropriate legislation by requesting and checking the relevant certification.

4.19 Fire Safety

Cabinet has approved an additional £3m from 2018/19 through to 2019/20, extended to 2020/21 to undertake fire safety remedial works at schools for which it is the responsible body. Works have completed in 6 schools. The programme to undertake the remaining works is currently being reviewed against other planned / agreed works to ensure the works are coordinated and minimise disruption to teaching and learning.

5. CONSULTATION

5.1 Where the admission arrangements have not changed from the previous year there is no requirement to consult, subject to the requirement that admission authorities must consult on their admission arrangements at least once every 7 years, even if there have been no changes during that period.

5.2 Croydon's Autism Partnership Board requested that information about current and developing education pathways for children with autism spectrum disorder (ASD) was shared at Board meetings. The first of these sessions (0-11 years – early years and primary) has taken place the second session (12-25 years – secondary to adulthood) is due to take place in January. The sessions provide an opportunity for feedback and question and answer.

6. PRE-DECISION SCRUTINY

6.1 This report did not go a Scrutiny meeting.

7 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

7.1 Revenue and Capital consequences of report recommendations

	Current year		
	2019/20	2020/21	2021/22
	£'000	£'000	£'000
Capital Budget available			
Permanent Expansion – Primary Places	2,057	1,150	1,048
SEN Places	18,854	18,807	8,568
Major Maintenance	3,046	2,882	2,000
Fire Safety Works	1,588	1,000	
Other Education Schemes	6,346	1,444	229
Effect of decision from report			
Expenditure	31,891	25,283	11,845
Funding Sources			
School Condition Fund	3,374	2,000	2,000
Basic Needs	5,331	0	0
ESFA Invest to Save	747	9,000	5,365
S106	558	0	0
Borrowing	21,881	14,283	4,480
Total Funding	31,891	25,283	11,845

7.1.1 The table above details the Education Capital Programme for the current and future two financial years and the associated funding sources. The third financial year spend has not been shown as it is dependent on the following, which will be concluded over the coming financial year 2020/21.

- a) The completion of the Condition Surveys across all of our community schools. This will determine the required level of funding over the coming years to ensure that our schools are compliant and safe.

- b) Conclusion of the viability study of the SEN estate; Redgates, Priory and St Giles.
 - c) The outcomes of the Croydon Local Plan Consultation
- 7.1.2 A detailed breakdown of the projects can be found in Appendix 2 to this report. With a further detailed breakdown of the Schools' Maintenance Programme in Appendix 4.
- 7.1.3 The ESFA have commissioned Croydon to lead on the delivery of the new special free school - Addington Valley Academy (on Timebridge site). This project is proposed to be funded by the ESFA at a cost of £15.112m. Both the expenditure and funding for this project is detailed in the table above and the project is listed in Appendix 2.
- 7.2 **The effect of the decision**
The use of the free schools route to provide new school places within the borough in the future will result in a reduction in the requirements for future capital funding from the council as this will be funded by central government.
- 7.3 **Risks**
Due to the nature of this programme there is a risk the projects may overspend and regular monitoring of all projects and the programme will be undertaken and reported to this Cabinet as part of the quarterly financial monitoring reports.
- 7.4 If the costs of Addington Valley Academy are greater than the funding allocated by the ESFA the additional costs will need to be funded by the Council above and beyond the already £558,000 committed.
- 7.5 With the opening date of the Addington Valley Academy revised to September 2021, the ability of being able to place the early years and primary places originally intended to be admitted in September 2020 in bulge classes is critical to the success and deliverability of the DSG deficit recovery plan.
- 7.6 **Future savings/efficiencies**
If additional free school providers are interested in opening schools in Croydon, the cost to the Council could be reduced further in the future years. Also the Council's borrowing requirement may also be reduced if any further funding is allocated by the Department for Education. The fall in birth rate and associated demand for school places would however result in reduced demand and this would be monitored closely to make future savings.
- 7.7 The provision of more school places within the borough will result in a reduction in the need for young people to travel outside of the borough, which will result in financial savings to the SEND budget.

Approved by: Lisa Taylor Director of Finance, Investment and Risk and s151 Officer

8. LEGAL CONSIDERATIONS

- 8.1 The Director of Law and Governance comments that there are no additional legal considerations arising from the recommendations beyond those set out in the body of this report.

Approved by Sean Murphy, Director of Law and Governance and Deputy Monitoring Officer

9. HUMAN RESOURCES IMPACT

- 9.1 There are no direct HR implications arising from this report for Council employees. Any resultant future increases or changes in staffing will be handled by schools' governing bodies in accordance with the appropriate school/council policy and procedures.

Approved by: Nadine Maloney, Head of HR; Children, Education and Families on behalf of the Director of Human Resources

10. EQUALITIES IMPACT

- 10.1 An equality analysis has been undertaken as part of the January 2020 report to help us to understand whether people with protected characteristics, as defined by the Equality Act 2010, will be disproportionately affected by the proposed changes and recommendations in the Education Estates Strategy report.
- 10.2 The proposed changes in this report will help the Council meet its statutory duty to provide sufficient school places for protected and non-protected groups. Croydon schools provide diverse educational provision in terms of type/category, size and educational sponsors. These include special schools, enhanced learning provisions at mainstream schools; and Academies /Free Schools. Pupils are allocated a school place based on the admissions criteria which aims to promote fair access to schools and are compliant with the School Admissions Code.
- 10.3 The proposed strategy supports the Council's Equality and Inclusion Policy by extending the existing provision to accommodate students with an SEND need. This will support Croydon's aspiration to:
- Make Croydon a place of opportunity and fairness by tackling inequality, disadvantage and exclusion.
 - Promote provisions that close gaps in educational attainment by working with local businesses and community groups to enable people of all ages to reach their full potential through greater opportunity to access to quality schools and learning.
 - Work in partnership to lift people out of poverty by increasing employment opportunities across the borough ensuring local people have a pathway into employment, education and training.
- 10.4 The proposed strategy supports the Council's general equality duty to have due regard to the need to eliminate unlawful conduct under the Equality Act 2010; to advance equality of opportunity and foster good relations between persons who share a protected characteristic and those who do not.
- 10.5 The equality analysis indicates that the proposed changes and recommendations will not negatively impact on any groups that share protected

characteristics and that no major change is required as the strategy meets the general and specific equality duties as required by the Equality Act. An Equality Analysis Impact is attached at Appendix 5. Furthermore there is a written commitment in the Equality Analysis to continue to keep the strategy under review and make changes as appropriate should the need arise. An Equality Impact Assessment is attached at Appendix 5.

Approved by: Yvonne Okiyo, Equalities Manager

11. ENVIRONMENTAL IMPACT

- 11.1 Through the delivery of the Education Capital Programme of works the Council will strive to deliver energy efficient solutions through design and construction methodologies with the intention to reduce energy use and associated carbon emissions in our schools.
- 11.2 The Council will work with schools to monitor the energy performance post works so that this can be captured in lessons learnt for future projects

12. CRIME AND DISORDER REDUCTION IMPACT

- 12.1 Children being in school will help prevent criminal and anti-social behaviour or being victim of such behavior and reduce the number of children and young people in the criminal justice system.

13. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 13.1 The recommendations of this report are set out to ensure that the Council is compliant with its statutory duties as an education authority:
 - School Place Planning (s13-14 Education Act 1996) to promote high standards of education and fair access to education; secure sufficient primary and secondary education, including SEN to meet the needs of the population of its area
 - School Admissions (School Admission Code 2014) to determine the Admission Arrangements for its community schools annually
 - School Maintenance - school buildings meet the minimum standard and premises are maintained so that they provide a suitable learning environment.

14. OPTIONS CONSIDERED AND REJECTED

- 14.1 In relation to mainstream schools, there are no confirmed plans to deliver any new/additional mainstream school places. A review of demand will be undertaken following consultation and decision on the Local Plan to ensure that

any potential increase in demand is included in future pupil place projections. Future demand for new schools will be delivered through the free school route.

14.2 Special Educational Needs and Disability

Options considered for the provision of the SEN Early Years specialist Rainbow nursery to ensure suitable early education is provided:

- continuing with the current provider (a mainstream nursery) through an extension of the existing contract agreement
- providing coherent specialist pathway by extending the age range of St Giles Special School

14.3 The specialist nature of this early years provision is such that no other options were considered. The need for provision of suitable specialist education that leads to coherent specialist pathways is a key determinant in this decision-making. .

14.4 Alternative options should not be identified purely for the purposes of the report. The report should merely reflect the various alternatives considered in the course of developing the project or initiative

15. DATA PROTECTION IMPLICATIONS

15.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

NO

15.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

NO

This report does not include any personal data.

The Director of Education comments that this report is an overview of education estates and does not contain any personal data.

Approved by: Shelley Davies, Interim Director of Education

CONTACT OFFICER:

Denise Bushay – Head of Service, School Place Planning & Admission, 0208 6047231
Alison Framer – Head of 0-25 SEN Service, 0208 604 7263

APPENDICES:

Appendix 1 – Community Schools Admission Arrangements
Appendix 1a – Pan London Co-ordination – Reception and Junior
Appendix 1b – Pan London Co-ordination – Secondary
Appendix 2 – Capital Budget Programme Budget Summary
Appendix 3 – Early Years Childcare Sufficiency Assessment report

Appendix 4 – Schools Maintenance Plan
Appendix 5 – Equality Impact Assessment

BACKGROUND DOCUMENTS: None

Draft Community Schools Admission Arrangements 2021/22

The criteria outlined below apply only to Croydon community schools.

Should any community school convert to academy status prior to September 2021, the admissions arrangements will apply as published below unless stated otherwise in their funding agreement.

Where the number of applications for a community school is higher than the published admission number, the following criteria will be applied in the order set out below to decide the allocation of places:

Children with an Education, Health & Care Plan (EHCP) or statement of special educational needs that names a school will be admitted to the school before the admissions criteria are applied to all other applicants. (See note 7)

1. **Looked-after children and previously looked-after children** (see Note 1).

2. **Linked schools**

Children who are on the roll of their linked infant school at the time of application. (see Note 2).

3. **Siblings:**

Children with a brother or sister who will be in attendance at the school or the linked infant/junior school at the time of enrolment of the new pupil (see Note 3).

4. **Exceptional medical need:**

Pupils with a serious medical need for attending a particular school. (See Note 4)

Supporting professional evidence must provide specific reasons why a particular school is the only school that can meet your child's needs and the detriment that would be caused if your child had to attend another school. Your application must be supported by a GP or consultant.

For primary age children, their need to attend a particular school because of a parent's serious and continuing medical condition may also be relevant.

Supporting evidence should be set out on the medical form which is available online at: <https://www.croydon.gov.uk/education/schools-new/school-admissions/applications-under-the-medical-criterion-community-primary-schools-only> and both the completed medical form and the supporting evidence from the GP or consultant must be submitted with the application (see Note 4).

By submitting your evidence to the local authority you consent to this information being shared with the local authority's medical advisor.

5. Distance:

Priority will be given to pupils living nearest to the school as measured in a straight line (see Notes 5 and 6).

Tiebreaker

In the event that the number of applications for places exceeds the number of places available, after application of the admissions criteria, distance will be used to decide between applications. Where distance is the same for two or more applications the authority will use random allocation, which will be independently verified.

Note 1: Looked-after children are defined as 'children in public care at the date on which the application is made'. Previously looked-after children are children who were looked after, but ceased to be so because they were adopted or became subject to a child arrangements order or special guardianship order, immediately after being looked-after. If an application is made under the 'looked-after' criterion, it must be supported by a letter from the relevant local authority children's services department and/or relevant documents.

Note 2: This criteria does not include siblings on the roll of the infant school's nursery class, if it has one.

A list of all infant and junior schools is provided in the table below. The shaded schools are their own admission authority, therefore, please refer to the individual school's admissions policy.

Linked Infant School	Linked Junior School
Beulah Infant	Beulah Junior
Elmwood Infant	Elmwood Junior
The Minster Nursery and Infant	The Minster Junior
Park Hill Infant	Park Hill Junior
St Joseph's Catholic Infant and Nursery	St Joseph's Catholic Junior
St Mary's Catholic Infant	St Mary's RC Junior
Whitehorse Manor Infant and Nursery	Whitehorse Manor Junior
Winterbourne Infant	Winterbourne Junior Girls
Winterbourne Infant	Winterbourne Junior Boys

Note 3: A sibling is defined as a brother or sister, half-brother or sister, step brother or sister, foster-brother or sister or adopted brother or sister whose main residence is the same address as the child for whom the school place application is being made.

Children with siblings allocated a place in the Reception or Year 3 class at a linked junior school to start in September will be eligible for priority under the sibling criterion

from 1 August each year when this local authority opens waiting lists for the new academic year.

In the case of in-year admissions, eligibility for sibling priority will apply at the time of an offer.

This criteria does not include siblings on the roll of the school's nursery class, if it has one.

Note 4: All schools have experience in dealing with children with a range of medical needs and all schools are required to make reasonable adjustments in order to do this.

In a very few exceptional cases, however, there may be reasons why a child needs to attend a specific school and this could be due to the child's medical need or the medical condition of the parent or the main carer with responsibility for the child. Providing evidence does not guarantee that a child will be given priority at a particular school and in each case a decision will be made based on the merits of the case and whether the evidence demonstrates that a placement should be made at one particular school above any other.

If you feel there are exceptional reasons for your child to be considered for a priority placement at a particular school, you must indicate this in the section provided in your application, and complete the medical form which is available online at :

<https://www.croydon.gov.uk/education/schools-new/school-admissions/applications-under-the-medical-criterion-community-primary-schools-only>, setting out the reasons to support your case.

All requests for priority consideration on medical grounds must be supported in writing by a doctor or consultant, and this must make clear which school you are making a special case for, the reason why it is necessary for your child to attend this school in particular, and the difficulties it will cause for your child to attend another school.

It is for you to decide how to support your case and what documents to provide, but these must be submitted, together with the completed medical form and supporting statement by the GP/consultant, by the closing date of **15 January 2021**. The admissions team is not responsible for chasing you to submit medical evidence or for contacting professionals for information about your case. Any decision will be based on documents you submit by the closing date.

The local authority, using guidance received from Croydon's admissions panel (this is comprised of professionals from health and education), will decide whether an application for a school is to be prioritised on medical grounds, in light of the medical evidence submitted by the parent for their child to attend this particular school. Claims for priority of admission on medical grounds submitted after a decision on the original application has been made will only be considered if the documents submitted were not readily available at the time of application or if they relate to a new medical condition. Any submission made after the initial application must be supported by

details of how the circumstances have changed since the original application and by further professional evidence.

Applicants who submit supporting information on medical grounds will not be advised whether their application is likely to be successful prior to the offer of places on 16 April 2021. If evidence is received after the closing date of 15 January 2021, it will not be taken into account until after places have been offered on 16 April 2021.

Note 5: 'Home' is defined as the address where the child normally resides Monday to Friday as their only or principal residence.

Addresses involving child-minding (professional or relatives) are excluded. There have been occasions when parents/carers have tried to use false addresses to obtain a place at a school. To prevent this happening, Croydon Council undertakes checks using an address verification tool called Datatank. If after these checks have taken place, we cannot be satisfied that the address is the parent and child's normal place of residence, the parent/carer will be asked to provide further proof of their home address. In this instance two forms of address verification will be required: a solicitor's letter confirming completion of contract or a tenancy agreement along with a recent utility bill in the applicant's name.

If the parent/carer is found to have used a false address or deliberately provided misleading information to obtain a school place, the offer will be withdrawn.

Should there be doubts about the address to be used, parents/carers may be asked to provide evidence concerning the child's normal place of residence. This could include a court order stating where the child should live during the course of the week. The local authority would expect that the parent/carer with whom the child is normally resident receives the child benefit for the child. If the residence is split equally between both parents, the home address may be determined to be the address where the child is registered with the doctor. This may be used to determine the normal place of residence for the purpose of measuring the home to school distance.

If parents/carers have more than one property they may be required to provide proof of the normal place of residence for the child.

The processing of applications outside England for admission to school within the normal admissions rounds (excluding Crown servants)

Applications with an address outside England can only be accepted for processing when this local authority is satisfied that there is **evidence of a link to an address in its area** and that **the child will be resident at that address on or before the date of admission** (i.e. start of September). Such evidence must include:

- Booked travel tickets and
- End of lease/notice to tenants in Croydon property or
- Start of employment contract in the Croydon area or
- End of employment contract abroad

The address outside England will apply until such time as there is evidence of a child's return to the linked address. In the event that a family does not return to the linked address provided by the start of September, this local authority will withdraw the application submitted and any offer made.

Note 6: The distance will be measured in a straight line from the child's home address to the designated entrance(s) of the school using a computerised measuring system (GIS) and geographical reference points as provided by the National Land and Property Gazetteer (NLPG). Those living closer to the school will receive higher priority.

If a child lives in a shared property such as flats, the geographical references will determine the start point within the property boundaries to be used for distance calculation purposes.

Distance measurements can be obtained using various internet sources however these do not replicate the system used by Croydon Council. Additionally, the distance measurement which can be obtained from the Croydon website using the 'Find It' link on the home page will not always be identical to that of the measurement obtained using the Croydon school admissions measuring tool (known as GIS) as the 'Find It' link is set up to measure to a range of council facilities and is not set up to measure for school admission purposes. It also does not give measurements to three decimal points.

Note 7: Education, Health and Care Plan or Statement of Special Educational Needs

An Education, Health and Care plan (EHCP) is an integrated support plan for children and young people with complex special needs and disabilities. The plan gives a detailed description of the range of difficulties a child is facing and the level and type of provision required to help the child make progress and achieve positive outcomes.

Child minding arrangements:

Child-minding cannot be taken into account when allocating places at oversubscribed community schools.

Children attending a nursery class attached to an infant or primary school

Parents of children attending the nursery class at an infant or primary school must apply for a reception class place in the usual way. These children are not guaranteed a reception place at the school where they are attending the nursery class.

All applications are considered strictly in accordance with a school's admission criteria. Unless otherwise stated, children on the roll of a school's nursery class are not given priority admission into a reception class.

Twins/triplets or other multiple births for admission into an infant class

If you are applying for twins, or children from a multiple birth, and there is only one place available at the school, legislation allows us to admit them all i.e. all siblings from a multiple birth.

Waiting lists

If you are offered a place at a school through the in-year admissions process and you have also expressed a higher preference for another school or other schools, you will not be placed on the waiting list for your higher preference school/schools. You may request for your child to be added to the waiting list by completing the 'waiting list request' form available on the website.

In-year waiting lists are maintained for one academic year and applicants who have been unsuccessful for their preferred school(s) and who wish to remain on the waiting list are required to re-apply the following academic year.

Waiting lists for community schools for applicants who applied as part of the main admissions rounds are held for the first term of the reception year and thereafter, applicants are required to complete the local authority's in-year common application form (ICAF) if they wish to remain on the waiting list.

Admission of children below compulsory school age deferred entry to school

Parents can defer the date their child is admitted to the school year but not beyond the point at which they reach compulsory school age and not beyond the beginning of the final term of the school year for which the application was made. Parents can also take up a part-time place until later in the school year but not beyond the point at which they reach compulsory school age.

A child reaches compulsory school age the term after their fifth birthday. Therefore, if you are offered a reception class place at a school, you can opt to defer your child's start date, but they **MUST** start full time school following their fifth birthday by the dates given below:

- Children born on or between 1 September and the end of December must start full time school by the beginning of the spring term in January
- Children born from 1 January to the end of March must start full time school on 1 April
- Children born from 1 April to the end of August must start school at the beginning of the autumn term in September

The local authority's expectation is that a child born between 1 April and 31 August should start the reception class at the beginning of the summer term at the latest. However, parents may choose that their child does not start school until the September (beginning of the autumn term) following their fifth birthday. Parents must note the place cannot be held open beyond the summer term, this will mean that as their child will be a year one pupil when they join, parents will need to apply for a year one school place, using the in-year application form.

Admission of children outside their normal age group

Parents may request that their child is exceptionally admitted outside their normal age group. The admission authority will decide whether or not the individual child's circumstances make this appropriate on educational grounds.

It is the expectation of Croydon Council that a child is educated alongside his/her age equivalent peers, in almost all cases. We would strongly advise that all children enter into their normal year group. The responsibility for addressing individual educational needs lies with the school through an appropriately differentiated and enriched curriculum.

All requests to educate a child outside their normal year group must include written explanation of why this is necessary and where applicable, evidence of the child's circumstances from a relevant professional detailing the child's educational need which makes education outside the normal age group necessary.

Decisions are made on the basis of the circumstances of each case and in the best interest of the child. This includes taking account of the following:

- Parents' views
- Information relating to the child's academic, social and emotional development, where relevant medical history and the views of a medical professional
- Any previous history of being educated outside of their normal age group
- If a child may naturally have fallen into a lower age group if it were not for being born prematurely
- Views of the head teacher of the school(s) concerned

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PAN-LONDON CO-ORDINATED ADMISSION SYSTEM

Template LA Schemes for Co-ordination of Admissions to Reception/Junior in Maintained Schools and Academies in 2021/22

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PAN-LONDON CO-ORDINATED ADMISSION SYSTEM

Template LA Schemes for Co-ordination of Admissions to Reception/Junior in 2021/22

Definitions used in the template schemes

“the Application Year”	the academic year in which the parent makes an application (i.e. in relation to the academic year of entry, the academic year preceding it).
“the Board”	the Pan-London Admissions Executive Board, which is responsible for the Scheme.
“the Business User Guide (BUG)”	the document issued annually to participating LAs setting out the operational procedures of the Scheme.
“the Common Application Form”	this is the form that each authority must have under the Regulations for parents to use to express their preferences, set out in rank order.
“the Equal Preference System”	the model whereby all preferences listed by parents on the Common Application Form are considered under the over-subscription criteria for each school without reference to parental rankings. Where a pupil is eligible to be offered a place at more than one school within an LA, or across more than one participating LA, the rankings are used to determine the single offer by selecting the school ranked highest of those which can offer a place.
“the Highly Recommended Elements”	the elements of the Template Scheme that are not mandatory but to which subscription is strongly recommended in order to maximise co-ordination and thereby simplify the application process as far as possible.
“the Home LA”	the LA in which the applicant/parent/carer is resident.
“the LIAAG Address Verification Register	the document containing the address verification policy of each participating LA.
“the Local Admission System	the IT module for administering admissions in

(LAS)”	each LA and for determining the highest offer both within and between participating Las.
“the London E-Admissions Portal”	the common online application system used by the 33 London LAs and Surrey County Council.
“the Maintaining LA”	the LA which maintains a school, or within whose area an academy is situated, for which a preference has been expressed.
“the Mandatory Elements”	those elements of the Template Scheme to which authorities must subscribe in order to be considered as ‘Participating Authorities’ and to benefit from use of the Pan-London Register.
“the Notification Letter”	the agreed form of letter sent to applicants on the Prescribed Day which communicates any determination granting or refusing admission to a primary or secondary school, which is attached as Schedule 2.
“the Prescribed Day”	the day on which parents/carers outcome are notified of their outcome. 16 April in the year following the relevant determination year except that, in any year in which that day is not a working day, the prescribed day shall be the next working day.
“the Pan-London Register (PLR)”	the database which will sort and transmit application and outcome data between the LAS of each participating LA.
“the Pan-London Timetable”	the framework for processing of application and outcome data, which is attached as Schedule 3.
“the Participating LA”	any LA that has indicated in the Memorandum of Agreement that they are willing to incorporate, at a minimum, the mandatory elements of the Template LA Scheme presented here.
“the Qualifying Scheme”	the scheme which each LA is required to formulate in accordance with The School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) Regulations 2012, for co-ordinating arrangements for the admission of children to

maintained primary and secondary schools
and academies.

PAN- LONDON CO-ORDINATED ADMISSIONS SYSTEM

Template LA Scheme for Co-ordination of Admissions to Reception/Junior in 2021/22

All the numbered sections contained in this scheme are mandatory except those marked with an which are highly desirable.*

Applications

1. Applications from residents of Croydon LA will be made on this LA's Common Application Form, which will be available and able to be submitted on-line. This will include all the fields and information specified in Schedule 1 to this Template LA Scheme. These will be supplemented by any additional fields and information which are deemed necessary by this LA to enable the admission authorities in the LA area to apply their published oversubscription criteria.
2. Croydon LA will take all reasonable steps to ensure that every parent/carer who is resident in this LA and has a child in a nursery class within a maintained school or academy - in this LA or any other maintaining LA - is informed about how they can access Croydon LA's composite prospectus and apply online. Croydon LA also uses Decaux boards, libraries, schools, early years' providers, social media to advertise the closing date for applications. Additionally, this LA offers parents support and assistance with their online application at schools and its offices.
Parents/carers who do not live in Croydon LA will have access to Croydon LA's composite prospectus which will advise parents/carers to contact their home LA for further information on the application process.
3. The admission authorities within Croydon LA will not use supplementary information forms except where the information available through the Common Application Form is insufficient for consideration of the application against the published oversubscription criteria. Where supplementary information forms are used by the admissions authorities within this LA, Croydon LA will seek to ensure that these only collect information which is required by the published oversubscription criteria, in accordance with paragraph 2.4 of the School Admissions Code 2014.
4. Where supplementary information forms are used by admission authorities in Croydon LA, they will be available on this LA's website, on the school's website, or a paper copy of the supplementary information form can be requested directly from the school. Such forms will advise parents that they must also complete their home LA's Common Application Form. Croydon LA's composite prospectus and website will indicate which schools in this LA require supplementary forms to be completed and where they can be obtained.

5. Where a school in Croydon LA receives a supplementary information form, this LA will not consider it to be a valid application unless the parent/carer has also listed the school on their home LA's Common Application Form, in accordance with paragraph 2.3 of the School Admissions Code 2014.
6. *Applicants will be able to express a preference for up to six maintained primary schools or academies within and/or outside the Home LA.
7. The order of preference given on the Common Application Form will not be revealed to a school within the area of this LA to comply with paragraph 1.9 of the School Admissions Code 2014. However, where a parent resident in this LA expresses a preference for schools in the area of another LA, the order of preference for that LA's schools will be revealed to that LA in order that it can determine the highest ranked preference in cases where an applicant is eligible for a place at more than one school in that LA's area.
8. Croydon LA undertakes to carry out the address verification process as defined in the Pan-London Coordinated Admissions Scheme. This will in all cases include validation of resident applicants against Croydon LA's maintained nursery and primary school data and the further investigation of any discrepancy. Where Croydon LA is not satisfied as to the validity of an address of an applicant whose preference has been sent to a maintaining LA, it will advise the maintaining LA no later than **12 February 2021**.
9. Croydon LA will confirm the status of any resident child for whom it receives a Common Application Form stating s/he is currently or previously a 'Child Looked After' and will provide any evidence requested by the maintaining LA in respect of a preference for a school in its area by **5 February 2021**.
10. Croydon LA will advise a maintaining LA of the reason for any application which is made in respect of a child resident in the area of this LA to be admitted outside of their correct age cohort, and will forward any supporting documentation to the maintaining LA by **5 February 2021**.

Processing

11. Applicants resident within Croydon LA must submit their online Common Application Form to this LA by **15 January 2021**.
12. *Supplementary Information Forms for schools in Croydon LA must be returned directly to the relevant school by the date specified by the school.* Under the requirements of the scheme, parents/carers will not have to complete a supplementary information form where this is not

strictly required for the governing body to apply their admission criteria or where this is not a requirement in a school's admission arrangements.

13. *Schools that require a supplementary information form will check that a supplementary information form has been completed for each child. Schools will contact parents/carers who have not completed a supplementary information form. Schools will also check that parents/carers who have completed a supplementary information form have completed the LA's Common Application Form. If a parent has not completed a Common application Form, schools will share this information with Croydon LA.*
14. *Croydon LA will send own admission authority schools details of Croydon residents' applications on **29 January 2021**. On **8 February 2021**, own admission authority schools will receive new lists containing details of resident applications as well as out of borough applications.*
15. *Any changes to the preferences or the order of preference on a Common Application Form made after **15 January 2021** will not normally be considered until after the initial round of allocation – that is after 16 April 2021, unless there is a change of circumstances.*
16. Application data relating to all preferences for schools in the area of a participating LA, which have been expressed within the terms of Croydon LA's scheme, will be up-loaded to the PLR by **5 February 2021**. Supplementary information provided with the Common Application Form will be sent to maintaining LAs by the same date.
17. *Alternative arrangements will be made by Croydon LA to forward applications and supporting information securely to non-participating LAs.*
18. Croydon LA shall, in consultation with the admission authorities within this LA's area and within the framework of the Pan-London timetable in Schedule 3B, determine its own timetable for the processing of preference data and the application of published oversubscription criteria.
19. **Croydon LA will accept late applications only if they are late for a good reason, deciding each case on its own merits. **The latest date that an application that is late for good reason can be accepted for a resident of this LA is 11 February 2021.***
20. Where such applications contain preferences for schools in other LAs, Croydon LA will forward the details to maintaining LAs via the PLR as they are received. Croydon LA will accept late applications which are considered to be on time within the terms of the home LA's scheme.
21. The latest date for the upload to the PLR of late applications which are considered to be on-time within the terms of the home LA's scheme is **12 February 2021**.

22. *Where an applicant moves from one participating home LA to Croydon LA after submitting an on-time application under the terms of the former home LA's scheme, Croydon LA will accept the application as on-time up until **11 February 2021**, on the basis that an on-time application already exists within the Pan-London system.
23. Croydon LA will participate in the application data checking exercise scheduled between **15 and 26 February 2021** in the Pan-London timetable in Schedule 3B.
24. All preferences for schools within Croydon LA will be considered by the relevant admission authorities without reference to rank order in accordance with paragraph 1.9 of the School Admissions Code 2014. When the admission authorities within Croydon LA have provided a list of applicants in criteria order to this LA, Croydon LA shall, for each applicant to its schools for whom more than one potential offer is available, use the highest ranked preference to decide which single potential offer to make. This is the 'Equal Preference System'.
25. *Own Admission authority schools must provide Croydon LA with the electronic list of their applicants in criteria order by **01 March 2021**.*
26. Croydon LA will carry out all reasonable checks to ensure that pupil rankings are correctly held in its LAS for all maintained schools and academies in this LA's area before uploading data to the PLR.
27. Croydon LA will upload the highest potential offer available to an applicant for a maintained school or academy in this LA to the PLR by **19 March 2021**. The PLR will transmit the highest potential offer specified by the Maintaining LA to the Home LA.
28. The LAS of this LA will eliminate, as a Home LA, all but the highest ranked offer where an applicant has more than one potential offer across Maintaining LAs submitting information within deadline to the PLR. This will involve exchanges of preference outcomes between the LAS and the PLR (in accordance with the iterative timetable published in the Business User Guide) which will continue until notification that a steady state has been achieved, or until **26 March 2021** if this is sooner.
29. Croydon LA will not make any additional offers between the end of the iterative process and **16 April 2021** which may impact on an offer being made by another participating LA.
30. Notwithstanding paragraph 29, if an error is identified within the allocation of places at a maintained school or academy in this LA, Croydon LA will attempt to manually resolve the allocation to correct the error. Where this impacts on another LA (either as a home or maintaining LA) Croydon LA will liaise with that LA to attempt to resolve the correct offer and any multiple offers which might occur. However, if another LA is unable to

resolve a multiple offer, or if the impact is too far reaching, Croydon LA will accept that the applicant(s) affected might receive a multiple offer.

31. Croydon LA will participate in the offer data checking exercise scheduled between **29 March and 9 April 2021** in the Pan-London timetable in Schedule 3B.
32. Croydon LA will send a file to the E-Admissions portal with outcomes for all resident applicants who have applied online no later than **13 April 2021**. (33 London LAs & Surrey LA only).

Offers

33. Croydon LA will ensure that, if there are places available, each resident applicant who cannot be offered a place at one of the preferences expressed on the Common Application Form, receives the offer of an alternative school place in accordance with paragraph 2.11 of the School Admissions Code 2014. *This will usually be the nearest school to the child's home address which has a place available, after the allocation of places has been completed.*
34. This LA's notification of the outcome will include the information set out in Schedule 2.
35. Croydon LA will inform all resident applicants of their highest offer of a school place and, where relevant, the reasons why higher preferences were not offered, whether they were for schools in the Home LA or in other participating LAs.
36. Croydon LA's notification information will include the information set out in Schedule 2.
37. Croydon LA will, on **16 April 2021**, publish online the outcome of resident applications. Resident applicants who applied online will be able to view the result of their application online as well as accept or decline their offer. *Croydon LA will not send out outcome letters in the post.*
38. *Resident applicants who are not successful in their application will be offered the right to appeal.*
39. *This LA will provide primary schools with destination data of its resident applicants by the end of the Summer term 2021.

Late applications

40. **Croydon LA will accept late applications as 'on-time' only if they are late for a good reason, deciding each case on its own merits. Examples of what will be considered as 'good reason' include when a single parent has*

been ill for some time, or has been dealing with the death of a close relative; a family who has just moved into the area or is returning from abroad (proof of ownership or tenancy of a property within Croydon LA will be required in these cases). Other circumstances will be considered and each case decided on its own merits and it is expected that all requests of this nature will be supported with evidence.

41. *The latest date that an application, that is late for good reason, can be accepted for a resident of Croydon LA will be **11 February 2021**. The date for an out-borough resident is fixed by the relevant home LA and is likely to be different for authorities outside the PAN London scheme.*
42. *Applications which are late for no good reason and those that are received after 11 February 2021 but before 16 April 2021 will not be considered in the initial allocation round but will be allocated a place after all on-time preferences have been processed. If the application is from a resident of Croydon LA and they cannot be offered a place at one of their preferences, they will be considered for a place at other maintained schools or academies in this LA that have vacancies, in accordance with the school's admission criteria. If the application is from a resident of another LA, their application will only be considered for the schools to which they have applied.*

Post Offer Process

43. Croydon LA will request that resident applicants accept or decline the offer of a place by **30 April 2021**, or within two weeks of the date of any subsequent offer.
44. *If resident applicants do not respond by this date, Croydon LA or the school, where it is its own admission authority, will make every reasonable effort to contact the applicant to find out whether or not they wish to accept the place. Where the applicant fails to respond and the admission authority can demonstrate that every reasonable effort has been made to contact the applicant, the offer of a place be withdrawn.*
45. Where an applicant resident in Croydon LA accepts or declines a place in a school maintained by another LA by **30 April 2021**, Croydon LA will forward the information to the maintaining LA by **7 May 2021**. Where such information is received from applicants after **30 April 2021**, Croydon LA will pass it to the maintaining LA as it is received.
46. Where a place becomes available in an oversubscribed maintained school or academy in Croydon LA's area, it will be offered from a waiting list ordered in accordance with paragraph 2.14 of the School Admissions Code 2014.

47. When acting as a maintaining LA, Croydon LA will place an applicant resident in the area of another LA on a waiting list for any higher preference school. Where this is not done automatically, it will be done immediately following a request from the home LA.
48. Where a waiting list is maintained by an admission authority of a maintained school or academy in this LA's area, the admission authority will inform this LA of a potential offer, in order that the offer may be made by the home LA.
49. When acting as a maintaining LA, Croydon LA will inform the home LA, where different, of an offer for a maintained school or Academy in this LA's area which can be made to an applicant resident in the home LA's area, in order that the home LA can offer the place.
50. When acting as a maintaining LA, Croydon LA and the admission authorities within it, will not inform an applicant resident in another LA that a place can be offered.
51. When acting as a home LA, Croydon LA will offer a place at a maintained school or Academy in the area of another LA to an applicant resident in its area, provided that the school is ranked higher on the Common Application Form than any school already offered. ***As a result, any offer held by the applicant resident at a lower preference school will automatically be withdrawn as a higher preference has been offered. Resident applicants who no longer wish to remain on the waiting list for a higher preference school must notify Croydon LA as soon as they receive their initial offer.***
52. ***When acting as a home LA, Croydon will offer a place at a Croydon maintained school or Academy to an applicant resident in its area, provided that the school is ranked higher on the Common Application Form than any school already offered. The lower preference school offered will automatically be withdrawn as a higher preference school has been offered. Resident applicants who no longer wish to remain on the waiting list for a higher preference school must notify Croydon LA as soon as they receive their initial offer.***
53. When acting as a home LA, when Croydon LA is informed by a maintaining LA of an offer which can be made to an applicant resident in this LA's area which is ranked lower on the Common Application Form than any school already offered, it will inform the maintaining LA that the offer will not be made.
54. When acting as a home LA, when Croydon LA has agreed to a change of preferences or preference order, it will inform any maintaining LA affected

by the change. In such cases, paragraphs 52 and 53 shall apply to the revised order of preferences.

55. When acting as a maintaining LA, Croydon LA will inform the home LA, where different, of any change to an applicant's offer status as soon as it occurs.
56. When acting as a maintaining LA, Croydon LA will accept a change of preferences or preference order (including reinstated or additional preferences) from home LAs for maintained schools and academies in its area.
57. When acting as a home LA, Croydon will accept applications for additional preferences after National Offer Day before the start of the new term.
58. Croydon LA, when acting as a home LA, will allow applicants to express up to three additional preferences before the start of the new term.
59. When acting as a home LA, Croydon LA will endeavour to fill any vacancies that become available after National Offer Day within four weeks from National Offer Day.
60. This LA's admission authorities will maintain a waiting list for at least one term until 31 December 2021. This LA will accept waiting lists requests from other LAs' residents through the maintaining LA.
61. *Croydon LA will maintain waiting lists for each school in its area with the exception of Voluntary Aided Schools who will maintain their own waiting lists. Croydon LA will notify applicants on the waiting list if a place becomes available. Any lower preference previously offered will be automatically withdrawn if an offer is made at a higher preference school.*
62. Resident Applicants who receive an offer at their first preference school will only be placed onto a waiting list for a lower preference school in exceptional circumstances which would need to be supported with relevant evidence. *In accordance with the Pan London agreement and to ensure that Croydon meets its duty to continue to coordinate admissions beyond National Offer Day and comply with the parents' highest possible preference, Croydon will ensure that waiting lists do not contain lower ranked preferences except where it has received a parent's request for a child to be placed on the waiting list for a lower preference school in exceptional circumstances.*

63. *Resident applicants who receive an offer at their first preference school will be able to apply for lower preference schools at the start of the new term through the in-year admission process.*
64. *Resident applicants who are unsuccessful in receiving an offer at one of their preferred schools will be given the opportunity to make late applications to schools they did not originally apply for.*
65. *Applications received after 16 April 2021 will be added to the waiting lists for the schools in this LA. Waiting lists will be ordered in accordance with each school's admission criteria.*
66. *Admission authorities for each school within Croydon LA will share details of their waiting lists with this LA.*
67. *When a vacancy occurs at a school within this LA, the first child on the waiting list will be considered for the place. Croydon LA will liaise with the admissions authority for the school and advise the parent/carer or home LA of the offer.*
68. *Where the first child is a resident of this LA, Croydon LA will issue notification of the outcome to the parent, provided that the school is ranked higher on the Common Application Form than any other school already offered.*
69. *When acting as a maintaining LA, Croydon LA will inform the home LA, where different, of an offer for a maintained school in this LA's area which can be made to an applicant resident in the home LA's area, in order that the home LA can offer the place.*
70. *When acting as a maintaining LA, Croydon will not inform an applicant resident in another LA that a place can be offered.*
71. *Own Admission Authority schools within Croydon LA will not inform any applicant that a place can be offered.*
72. *Waiting lists for schools in Croydon LA will be held for the first term of the Reception Year only, until **31 December 2021**. Applicants wishing to remain on a school's waiting list after this date must apply using the LA or school's In- Year Application Form in accordance with each admission authority's arrangements. This is to ensure that this LA has the most up to date information for an applicant, including a correct proof of address as at the time of the new application.*
73. *Waiting lists will be maintained and places allocated as they become available, in accordance with each admissions authority's published admission and oversubscription criteria, and without regard to the date*

the application was received or when a child's name was added to the waiting list.

Applications for places in Reception after 31 December 2021 and applications to year groups other than to the Reception class.

74. *Applications for places in Reception after 31 December 2021 and to year groups other than the normal year of entry to primary school will be treated as in-year admissions.*
75. *Applications will be made and considered in line with the schools' admission arrangements. Please refer to Croydon's website and in-year guidance for more information.*
76. *Once an offer is made applicants will only be added to a waiting list if the parent/carer requests this in writing.*

**PAN-LONDON CO-ORDINATED ADMISSIONS SCHEME
SCHEDULE 1**

**Minimum Content of Common Application Form for Admissions to
Reception/Junior in 2021/22**

Child's details:

Surname

Forename(s)

Middle name(s)

Date of Birth

Gender

Home address

Name of current school

Address of current school (if outside home LA)

Parent's details:

Title

Surname

Forename

Address (if different to child's address)

Telephone Number (Home, Daytime, Mobile)

Email address

Relationship to child

Preference details (x 6 recommended):

Name of school

Address of school

Preference ranking

Local authority in which the school is based

Additional information:

Reasons for Preferences (including any medical or social reasons)

Does the child have an Education, Health and Care Plan Y/N*

Is the child a 'Child Looked After (CLA)'? Y/N

Is the child formerly CLA but now adopted or subject of a 'Child Arrangements

Order or 'Special Guardianship Order'? Y/N

If yes, name of responsible local authority

Surname of sibling

Forename of sibling

DOB of sibling

Gender of sibling

Name of school sibling attends

Other:

Signature of parent or guardian

Date of signature

* Where an LA decides not to request this information on the CAF, it must guarantee that no details of a child with an Education, Health and Care Plan will be sent via the PLR.

PAN-LONDON CO-ORDINATED ADMISSIONS SCHEME

SCHEDULE 2

Template Outcome Letter for Admissions to Reception/Junior in 2021/22

From: Home LA

Date: **16 April 2021**
(prim)

Dear Parent,

Application for a Primary/Junior School

I am writing to let you know the outcome of your application for a primary school. Your child has been offered a place at X School. The school will write to you with further details.

I am sorry that it was not possible for your child to be offered a place at any of the schools which you listed as a higher preference on your application form. For each of these schools there were more applications than places, and other applicants has a higher priority than your child under the school's published admission criteria.

Offers which could have been made for any schools which you placed lower in your preference list, were automatically withdrawn under the co-ordinated admission arrangements, as a higher preference has been offered.

If you would like more information about the reason that your child was not offered a place at any higher preference school, you should contact the admission authority that is responsible for admissions to the school within the next few days. Details of the different admission authorities for schools in the borough of X are attached to this letter. If the school is outside the borough of X, the admission authority will either be the borough in which the school is situated, or the school itself.

You have the right of appeal under the School Standards & Framework Act 1998 against the refusal of a place at any of the schools for which you have applied. If you wish to appeal, you must contact the admission authority for the school within the next few days to obtain the procedure and the date by which an appeal must be received by them.

Please would you confirm that you wish to accept the place at X School by completing the reply slip below. If you do not wish to accept the place, you will need to let me know what alternative arrangements you are making for your child's education.

You must contact this office if you wish to apply for any other school, either in this borough or elsewhere.

*Please return the reply slip to me by **30 April 2021 (prim)**. If you have any questions about this letter, please contact me on _____.*

Yours sincerely

(First preference offer letters should include the paragraphs in italics only)

**PAN-LONDON CO-ORDINATED ADMISSIONS SCHEME
SCHEDULE 3B**

Timetable for Admissions to Reception/Junior in 2021/2022

Fri 15 Jan 2021	Statutory deadline for receipt of applications
Fri 5 Feb 2021	Deadline for the transfer of application information by the Home LA to the PLR (ADT file)
Fri 12 Feb 2021	Deadline for the upload of late applications to the PLR.
Fri 15 – Fri 26 Feb 2021	Checking of application data
Fri 19 Mar 2021	Deadline for the transfer of potential offer information from the Maintaining LAs to the PLR (ALT file).
Fri 26 Mar 2021	Final ALT file to PLR
Mon 29 Mar- Fri 9 Apr 2021	Checking of offer data
Tues 13 Apr 2021	Deadline for on-line ALT file to portal
Fri 16 April 2021	Outcomes published online.
Fri 30 Apr 2021	Deadline for receipt of acceptances
Fri 7 May 2021	Deadline for transfer of acceptances to maintaining LAs

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PAN-LONDON CO-ORDINATED ADMISSION SYSTEM

Template LA Scheme for Co-ordination of Admissions to Year 7/Year 10 in Maintained Schools and Academies in 2021/22

Contents

Page 2: Definitions used in this document

Page 5: Template scheme for co-ordination of admissions to Year 7 in September 2021

Page 12: Content of Common Application Form -Year 7 Scheme (Schedule 1)

Page 14: Template outcome letter -Year 7 Scheme (Schedule 2)

Page 16: Timetable for Year 7 Scheme (Schedule 3A)

PAN-LONDON CO-ORDINATED ADMISSION SYSTEM

Template LA Scheme for Co-ordination of Admissions to Year 7/Year 10 in 2021/22

Definitions used in the template schemes

“the Application Year”	the academic year in which the parent makes an application (i.e. in relation to the academic year of entry, the academic year preceding it)
“the Board”	the Pan-London Admissions Executive Board, which is responsible for the Scheme
“the Business User Guide (BUG)”	the document issued annually to participating LAs setting out the operational procedures of the Scheme
“the Common Application Form”	this is the form that each authority must have under the Regulations for parents to use to express their preferences, set out in rank order
“the Equal Preference System”	the model whereby all preferences listed by parents on the Common Application Form are considered under the over-subscription criteria for each school without reference to parental rankings. Where a pupil is eligible to be offered a place at more than one school within an LA, or across more than one participating LA, the rankings are used to determine the single offer by selecting the school ranked highest of those which can offer a place
“the Highly Recommended Elements”	the elements of the Template Scheme that are not mandatory but to which subscription is strongly recommended in order to maximise co-ordination and thereby simplify the application process as far as possible
“the Home LA”	the LA in which the applicant/parent/carer is resident
“the LIAAG Address Verification Register	the document containing the address verification policy of each participating LA
“the Local Admission System	the IT module for administering admissions in

(LAS)”	each LA and for determining the highest offer both within and between participating LAs
“the London E-Admissions Portal”	the common online application system used by the 33 London LAs and Surrey County Council
“the Maintaining LA”	the LA which maintains a school, or within whose area an academy is situated, for which a preference has been expressed
“the Mandatory Elements”	those elements of the Template Scheme to which authorities must subscribe in order to be considered as ‘Participating Authorities’ and to benefit from use of the Pan-London Register
“the Notification Letter”	the agreed form of letter sent to applicants on the Prescribed Day which communicates any determination granting or refusing admission to a primary or secondary school, which is attached as Schedule 2
“the Prescribed Day”	the day on which parents/carers are notified of their outcome. 1 March (secondary) in the year following the relevant determination year except that, in any year in which that day is not a working day, the prescribed day shall be the next working day.
“the Pan-London Register (PLR)”	the database which will sort and transmit application and outcome data between the LAS of each participating LA
“the Pan-London Timetable”	the framework for processing of application and outcome data, which is attached as Schedule 3A
“the Participating LA”	any LA that has indicated in the Memorandum of Agreement that they are willing to incorporate, at a minimum, the mandatory elements of the Template LA Scheme presented here.
“the Qualifying Scheme”	the scheme which each LA is required to formulate in accordance with The School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) Regulations 2012, for co-ordinating

arrangements for the admission of children to
maintained secondary schools and
academies.

PAN LONDON CO-ORDINATED ADMISSIONS SYSTEM

Template Scheme for Co-ordination of Admissions to Year 7/Year 10 in 2021/22

All the numbered sections contained in this scheme are mandatory, except those marked with an which are highly desirable.*

Applications

1. Croydon LA will advise home LAs of their resident pupils on the roll of this LA's maintained primary schools and academies who are eligible to transfer to secondary school in the forthcoming academic year.
2. Applications from residents of Croydon LA will be made on this LA's Common Application Form, which will be available and able to be submitted on-line. This will include all the fields and information specified in Schedule 1 to this Template LA Scheme. These will be supplemented by any additional fields and information which are deemed necessary by Croydon LA to enable the admission authorities in the LA area to apply their published oversubscription criteria.
3. Croydon LA will take all reasonable steps to ensure that every parent/carers who is resident in this LA and has a child in their last year of primary education within a maintained school or academy, either in Croydon LA or any other maintaining LA, is informed how they can access Croydon's composite prospectus and apply online. Parents/carers who do not live in Croydon LA will have access to this LA's composite prospectus which will advise parents/carers to contact their home LA for further details on the application process.
4. The admission authorities within Croydon LA will not use supplementary information forms except where the information available through the Common Application Form is insufficient for consideration of the application against the published oversubscription criteria. Where supplementary information forms are used by the admissions authorities within Croydon LA, the LA will seek to ensure that these only collect information which is required by the published oversubscription criteria, in accordance with paragraph 2.4 of the School Admissions Code 2014.
5. Where supplementary information forms are used by admission authorities in Croydon LA, they will either be available on the school's website, on the LA's website or a paper copy of the supplementary information form can be requested from the school directly. Such forms will advise parents that they must also complete their home LA's Common Application Form. Croydon LA's composite prospectus will indicate which schools in this LA require

supplementary information forms to be completed and where they can be obtained.

6. Where an admission authority in this LA receives a supplementary information form, Croydon LA will not consider it to be a valid application unless the parent/carers has also listed the school on their home LA's Common Application Form, in accordance with paragraph 2.3 of the School Admissions Code 2014.
7. *Applicants will be able to express a preference for six maintained secondary schools or Academies within and/or outside the Home LA.
8. *Croydon LA will advise applicants that they will receive no more than one offer of a school place on 1 March 2021. Applicants will also be advised that a place will be offered at the highest preference school for which they are eligible for a place. If the parent nominates a school outside of a PAN-London LA, Croydon LA will pass relevant details on to that authority and will make every reasonable effort to resolve any multiple offers with them.*
9. The order of preference given on the Common Application Form will not be revealed to a school within the area of this LA. This is to comply with paragraph 1.9 of the School Admissions Code 2014 which states that admission authorities must not give priority to children whose parents rank preferred schools in particular order, including 'first preference first' arrangements. However, where a parent resident in Croydon LA expresses a preference for schools in the area of another LA, the order of preference for that LA's schools will be revealed to that LA in order that it can determine the highest ranked preference in cases where an applicant is eligible for a place at more than one school in that LA's area.
10. Croydon LA undertakes to carry out the address verification process as defined in the Pan-London Coordinated Admissions Scheme. This will in all cases include validation of resident applicants against this LA's primary school data and the further investigation of any discrepancy using Council Tax and Electoral Register records. Where Croydon LA is not satisfied as to the validity of an address of an applicant whose preference has been sent to a maintaining LA, it will advise the maintaining LA no later than **11 December 2020**.
11. Croydon LA will confirm the status of any resident child for whom it receives a Common Application Form stating s/he is currently or previously a 'Child Looked After' and will provide any evidence requested by the maintaining LA in respect of a preference for a school in its area by **12 November 2020**.
12. Croydon LA will advise a maintaining LA of the reason for any application which is made in respect of a child resident in the area of

this LA to be admitted outside of their correct age cohort, and will forward any supporting documentation to the maintaining LA by **12 November 2020**.

Processing

13. Applicants resident within Croydon LA must return the Common Application Form, which will be available and able to be submitted online, to this LA by **31 October 2020**.
14. Application data relating to all preferences for schools in the area of a participating LA, which have been expressed within the terms of this LA's scheme, will be up-loaded to the PLR by **12 November 2020**. Supporting documentation provided with the Common Application Form will be sent to maintaining LAs by the same date.
15. Croydon LA shall, in consultation with the admission authorities within its area and within the framework of the Pan-London timetable in Schedule 3A, determine and state its own timetable for the processing of preference data and the application of published oversubscription criteria.
16. *Supplementary information forms must be returned directly to the relevant school by the date specified by the school.* Under the requirements of the scheme, parents/carers will not have to complete a supplementary information form where this is not strictly required for the governing body to apply their admission criteria or where this is not a requirement in a school's admission arrangements.
17. *Croydon LA will send admission authorities details of their applications on **20 November 2020**. Schools that require a supplementary form will check that a supplementary form has been completed for each child and will contact parents/carers who have not completed a supplementary information form. Schools will also check that parents/carers who have completed a supplementary information form have completed the LA's Common Application Form. If a parent has not completed a Common Application Form, schools will share this information with Croydon LA.*
18. **Croydon LA will accept late applications only if they are late for a good reason, deciding each case on its own merits. The latest date that an application that is late for good reason can be accepted for a resident of this LA is **10 December 2020**.*
19. Where such applications contain preferences for schools in other LAs, Croydon LA will forward the details to maintaining LAs via the PLR as they are received. This LA will accept late applications which are considered to be on time within the terms of the home LA's scheme.

20. The latest date for the upload to the PLR of late applications which are considered to be on-time within the terms of the home LA's scheme is **11 December 2020**.
21. Where an applicant moves from one participating home LA to another after submitting an on-time application under the terms of the former home LA's scheme, the new home LA will accept the application as on-time up to **10 December 2020**, on the basis that an on-time application already exists within the Pan-London system.
22. *Applications which are late for no good reason and applications received after **10 December 2020** but before **1 March 2021** will be considered after all on-time applications have been processed.*
23. Croydon LA will participate in the application data checking exercise scheduled between **14 December 2020 and 4 January 2021** in the Pan-London timetable in Schedule 3A.
24. All preferences for schools within Croydon LA will be considered by the relevant admission authorities without reference to rank order to comply with paragraphs 1.9 of the School Admissions Code 2014. When the admission authorities within Croydon LA have provided a list of applicants in criteria order to this LA, this LA shall, for each applicant to its schools for whom more than one potential offer is available, use the highest ranked preference to decide which single potential offer to make. This is the 'Equal Preference System'.
25. *Schools must provide Croydon LA with an electronic list of their applicants ranked in criteria order by **11 January 2021**.*
26. Croydon LA will carry out all reasonable checks to ensure that pupil rankings are correctly held in its LAS before uploading data to the PLR.
27. Croydon LA will upload the highest potential offer available to an applicant for a maintained school or academy in this LA to the PLR by **29 January 2021**. The PLR will transmit the highest potential offer specified by the Maintaining LA to the Home LA.
28. The LAS of this LA will eliminate, as a Home LA, all but the highest ranked offer where an applicant has more than one potential offer across Maintaining LAs submitting information within deadline to the PLR. This will involve exchanges of preference outcomes between the LAS and the PLR (in accordance with the iterative timetable published in the Business User Guide) which will continue until notification that a steady state has been achieved, or until **12 February 2021** if this is sooner.

29. Croydon LA will not make an additional offer between the end of the iterative process and **1 March 2021** which may impact on an offer being made by another participating LA.
30. Notwithstanding paragraph 29, if an error is identified within the allocation of places at a maintained school or academy in this LA, Croydon LA will attempt to manually resolve the allocation to correct the error. Where this impacts on another LA (either as a home or maintaining LA) Croydon LA will liaise with that LA to attempt to resolve the correct offer and any multiple offers which might occur. However, if another LA is unable to resolve a multiple offer, or if the impact is too far reaching, this LA will accept that the applicant(s) affected might receive a multiple offer.
31. Croydon LA will participate in the offer data checking exercise scheduled between **15 and 22 February 2021** in the Pan-London timetable in Schedule 3A.
32. Croydon LA will send a file to the E-Admissions portal with outcomes for all resident applicants who have applied online no later than **23 February 2021**. (33 London LAs & Surrey LA only).

Offers

33. Croydon LA will ensure that, if there are places available, each resident applicant who cannot be offered a place at one of the preferences expressed on the Common Application Form, receives the offer of an alternative school place in accordance with paragraph 2.11 of the School Admissions Code 2014. This will usually be the nearest school to the child's home address which has a place available, after the allocation of places has been completed.
34. Croydon LA will inform all resident applicants of their highest offer of a school place and, where relevant, the reasons why higher preferences were not offered, whether they were for schools in the Home LA or in other participating LAs.
35. This LA's online notification will include the information set out in Schedule 2.
36. *On **1 March 2021**, all resident applicants who applied online will be able to view their outcome online as well as accept or decline their offer. Croydon LA will not send outcome letters in the post.*
37. *Croydon LA will provide primary schools with destination data of its resident applicants by the end of the Summer term 2021.

Post Offer

38. Croydon LA will request that resident applicants accept or decline the offer of a place by **15 March 2021**, or within two weeks of the date of any subsequent offer.
39. Where an applicant resident in this LA accepts or declines a place in a school within the area of another LA by **15 March 2021**, Croydon LA will forward the information to the maintaining LA by **22 March 2021**. Where such information is received from applicants after **15 March 2021**, this LA will pass it to the maintaining LA as it is received.
40. Where a place becomes available in an oversubscribed maintained school or academy in this LA's area, it will be offered from a waiting list ordered in accordance with paragraph 2.14 of the School Admissions Code 2014.
41. Where a waiting list is maintained by an admission authority of a maintained school or academy in this LA's area, the admission authority will inform Croydon LA of a potential offer, in order that the home LA can offer the place.
42. When acting as a maintaining LA, Croydon LA will inform the home LA, where different, of an offer for a maintained school or Academy in this LA's area which can be made to an applicant resident in the home LA's area, in order that the home LA can offer the place.
43. When acting as a maintaining LA, this LA and the admission authorities within it, will not inform an applicant resident in another LA that a place can be offered.
44. When acting as a home LA, Croydon LA will offer a place at a maintained school or Academy in the area of another LA to an applicant resident in its area, provided that the school is ranked higher on the Common Application Form than any school already offered.
45. When acting as a home LA, when Croydon LA is informed by a maintaining LA of an offer which can be made to an applicant resident in this LA's area which is ranked lower on the Common Application Form than any school already offered, it will inform the maintaining LA that the offer will not be made.
46. When acting as a home LA, when Croydon LA has agreed to a change of preference order for good reason, it will inform any maintaining LA affected by the change. In such cases, paragraphs 44 and 45 shall apply to the revised order of preferences.

47. When acting as a maintaining LA, Croydon LA will inform the home LA, where different, of any change to an applicant's offer status as soon as it occurs.
48. When acting as a maintaining LA, Croydon LA will accept a change of preferences or preference order (including reinstated or additional preferences) from home LAs for maintained schools and academies in its area.
49. When acting as a maintaining LA, Croydon LA will accept new applications (including additional preferences) from home LAs for maintained schools and academies in its area.
50. This LA, when acting as a home LA, will allow applicants to express additional preferences before the start of the school term, after National Offer Day. The number of additional preferences will be unrestricted.
51. Croydon LA, when acting as a home LA, will aim to start filing any vacancies which become available after 1 March 2021 within four weeks of National Offer Day. Secondary schools will be sent their waiting list and will be asked to rank all applicants, including late applications received after 31 October 2020, in accordance with their oversubscription criteria. Secondary schools will then advise Croydon LA of the offers to be made.
52. *Resident applicants who receive an offer at their first preference school will not be placed onto a waiting list for a lower preference school unless there has been a change in circumstances which would need to be supported with relevant evidence. In accordance with the Pan London agreement and to ensure that Croydon meets its duty to continue to coordinate admissions beyond National Offer Day and comply with the parents' highest possible preference, Croydon will ensure that waiting lists do not contain lower ranked preferences except where it has received a parent's request for a child to be placed on the waiting list for a lower preference school following a change of circumstances.*

Waiting lists

Waiting lists will be maintained by Croydon secondary schools for at least one term until **31 December 2021** and places will be filled in accordance with each school's admission criteria. After this date, parents/carers will need to apply through the in-year application process if they wish their child to remain on a school's waiting list. Parents/carers must also refer to each school's admission policy for more information regarding the management of waiting lists.

Parents/carers' enquiries regarding waiting list positions or appeal procedures must be made directly to the schools.

The PAN London Coordinated Admission Scheme ends on **31 August 2021**. Applications for Year 7 received after this date will be treated as in-year applications. Please refer to Croydon Council's website and the in-year admissions guidance for more information.

**PAN-LONDON CO-ORDINATED ADMISSIONS SCHEME
SCHEDULE 1**

**Minimum Content of Common Application Form for Admissions to Year
7/Year 10 in 2021/22**

Child's details:

Surname

Forename(s)

Middle name(s)

Date of Birth

Gender

Home address

Name of current school

Address of current school (if outside home LA)

Parent's details:

Title

Surname

Forename

Address (if different to child's address)
Telephone Number (Home, Daytime, Mobile)
Email address
Relationship to child

Preference details (x 6 recommended):

Name of school
Address of school
Preference ranking
Local authority in which the school is based

Additional information:

Reasons for Preferences (including any medical or social reasons)
Does the child have an Education, Health and Care Plan Y/N*
Is the child a 'Child Looked After (CLA)'? Y/N
Is the child formerly CLA but now adopted or subject of a 'Child Arrangements Order or 'Special Guardianship Order'? Y/N
If yes, name of responsible local authority
Surname of sibling
Forename of sibling
DOB of sibling
Gender of sibling
Name of school sibling attends

Other:

Signature of parent or guardian

Date of signature

*Where an LA decides not to request this information on the CAF, it must guarantee that no details of a child with an Education, Health and Care Plan will be sent via the PLJR.

PAN-LONDON CO-ORDINATED ADMISSIONS SCHEME

SCHEDULE 2

Template Outcome Letter for Admissions to Year 7/Year 10 in 2021/2022

From: Home LA

Date: **1 March 2021**
(sec)

Dear Parent,

Application for a Secondary School

I am writing to let you know the outcome of your application for a secondary/primary school. Your child has been offered a place at X School. The school will write to you with further details.

I am sorry that it was not possible for your child to be offered a place at any of the schools which you listed as a higher preference on your application form. For each of these schools there were more applications than places, and other applicants has a higher priority than your child under the school's published admission criteria.

Your child's name has been automatically added on the waiting list for any higher preference school you have been unsuccessful.

Offers which could have been made for any schools which you placed lower in your preference list, were automatically withdrawn under the co-ordinated admission arrangements, as a higher preference has been offered.

If you would like more information about the reason that your child was not offered a place at any higher preference school, you should contact the admission authority that is responsible for admissions to the school within the next few days. Details of the different admission authorities for schools in the borough of X are attached to this letter. If the school is outside the borough of X, the admission authority will either be the borough in which the school is situated, or the school itself.

You have the right of appeal under the School Standards & Framework Act 1998 against the refusal of a place at any of the schools for which you have applied. If you wish to appeal, you must contact the admission authority for the school within the next few days to obtain the procedure and the date by which an appeal must be received by them.

Please would you confirm that you wish to accept the place at X School by completing the reply slip below. If you do not wish to accept the place, you will need to let me know what alternative arrangements you are making for your child's education.

*Please return the reply slip to me by **15 March 2021 (sec)**. If you have any questions about this letter, please contact me on _____.*

Yours sincerely

(First preference offer letters should include the paragraphs in italics only)

**PAN-LONDON CO-ORDINATED ADMISSIONS SCHEME
SCHEDULE 3A**

Timetable for Admissions to Year 7/Year 10 in 2021/22

Wed 31 Oct 2020	Statutory deadline for receipt of applications
Thurs 12 Nov 2020	Deadline for the transfer of application information by the Home LA to the PLR (ADT file).
Fri 11 Dec 2020	Deadline for the upload of late applications to the PLR.
Mon 14 Dec 2020 – Mon 4 Jan 2021	Checking of application data
Fri 29 Jan 2021	Deadline for the transfer of potential offer information from Maintaining LAs to the PLR (ALT file)
Fri 12 Feb 2021	Final ALT file to PLR
Mon 15 – Mon 22 Feb 2021	Checking of offer data
Tues 23 Feb 2021	Deadline for on-line ALT file to portal
Mon 1 Mar 2021	Outcomes published online.
Mon 15 Mar 2021	Deadline for return of acceptances
Mon 22 Mar 2021	Deadline for transfer of acceptances to maintaining LAs

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Appendix 2					
Capital Programme Budget Summary					
Planning Area	Project Description	2019-20	2020-21	2021-22	Total
	Table 1 - Primary School Places				
	Permanent Expansions				
North West	Chestnut Primary Academy	94,000	40,063	-	134,063
North West	West Thornton Academy, Canterbury Road	350,000	200,000	115,967	665,967
Central	Harris Purley Way (pka Fiveways)	304,569	250,000	250,000	804,569
Central	Ark Oval Permanent Expansion	42,111	-	-	42,111
Central	Heathfield Academy, Aberdeen Road	269,866	165,000	95,000	529,866
East	1FE St Johns	71,632	69,000	69,000	209,632
East	1 FE Heavers Farm	199,482	67,000	67,000	333,482
South	Christ Church	120,000	120,000	194,784	434,784
South West	1 FE Chipstead Valley	105,000	80,000	80,302	265,302
South West	Smitham	200,000	100,000	86,742	386,742
	Subtotal	1,756,660	1,091,063	958,795	3,806,518
	Bulges				
Various	Contingency provision	100,000	58,937	90,000	248,937
South	Smitham Primary School (Bulge)	150,000	-	-	150,000
South	Wolsey Junior School Modular (Bulge)	50,000	-	-	50,000
	Subtotal	300,000	58,937	90,000	448,937
	Table 1 Subtotal	2,056,660	1,150,000	1,048,795	4,255,455
	Table 2 SEN				
South	St Giles Internal Re-modelling Works	110,000	-	-	110,000
South	Red Gates permanent expansion (1FE bulge 2018)	173,965	-	-	173,965
South	St Nicholas (112 place SEN primary expansion)	13,801,383	4,998,617	508,731	19,308,731
South	Red Gates Modular Building (bulge 2018)	-	30,000	80,000	110,000
South	Red Gates Modular Building (bulge 2019)	300,000	50,000	25,000	375,000
South	Meridian School improved suitability for ASD secondary ELP	100,000	-	-	100,000
South	Castlehill School places for children with ASD at primary ELP	50,000	-	-	50,000
North East	Priory School Hermitage Road Site Fencing	65,000	-	-	65,000
Various	SEN Future Provision (Special School Option)	1,475,599	1,368,854	2,468,855	5,313,308
Central	Post 16 SEN Provision with Croydon College	200,000	3,100,000	-	3,300,000
Central	Post 16 SEN Temp. Modular - Coulsdon College Site	620,000	60,000	120,000	800,000
South East	Addington Valley Academy (For ESFA)	1,305,000	9,000,000	5,365,000	15,670,000
Various	Suitability - SEN Contingency	553,185	200,000	-	753,185
North	Beckmead School (Forest Academy)	100,000	-	-	100,000
	Table 2 Subtotal	18,854,132	18,807,471	8,567,586	46,229,189
	Table 3 - Major Maintenance				

Various	Education Major Maintenance Programme	3,046,832	2,882,000	2,000,000	7,928,832
	Table 3 - Subtotal	3,046,832	2,882,000	2,000,000	7,928,832
	Table 4 – Fire Safety Works				
Various	Fire Safety Works	1,587,571	1,000,000	-	2,587,571
	Table 4 - Subtotal	1,587,571	1,000,000	-	2,587,571
	Table 5 - Other Education Schemes				
North West	Elmwood Juniors Kitchen Replacement	494,755	-	-	494,755
South	Kenley Internal Re-modelling Works	200,000	-	-	200,000
Various	Basic Need (2019-20)	4,859,998	614,701	-	5,474,699
Various	Various Other Education Programme Capital Projects	790,813	829,000	228,907	1,848,720
	Table 5 - Subtotal	6,345,566	1,443,701	228,907	8,018,174
	Totals	31,890,761	25,283,172	11,845,288	69,019,221

Croydon's Childcare Sufficiency Assessment 2019

CROYDON
www.croydon.gov.uk

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1. Introduction

All councils are required by law to 'report annually to elected council members on how they are meeting their duty to secure sufficient childcare, and make this report available and accessible to parents'.¹ We have prepared this report in order to meet this duty.

Having sufficient childcare means that families are able to find childcare that meets their child's learning needs and enables parents to make a real choice about work and training. This applies to all children from birth to age 14, and to children with disabilities. Sufficiency is assessed for different groups, rather than for all children in the local authority.

In this report, we have made an assessment of sufficiency using data about the need for childcare and the amount of childcare available, along with feedback from local parents about how easy or difficult it has been for them to find suitable childcare.

We use information about childcare sufficiency to plan our work supporting the local childcare economy.

¹ Statutory guidance on Early Education and Childcare, effective from 1 March 2018.

2. Methodology

Quantitative and qualitative data as at 31st July 2019 is used within this report and consideration given to supply and demand, availability, affordability, choice and flexibility and quality under three main themes:

- childcare for children aged 0 to 4 years
- childcare for children aged 5 to 14 years and
- childcare for children with disabilities or special needs (all ages)

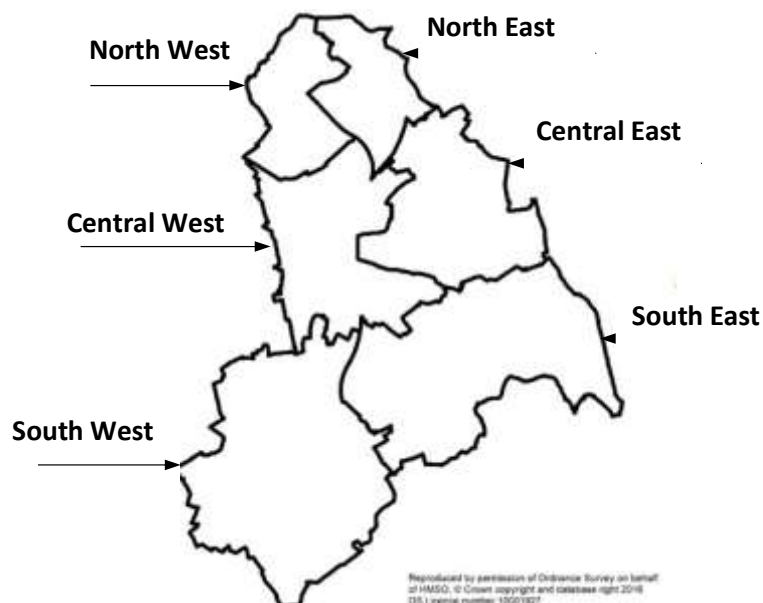
Analysis of demographic and socio-economic data was conducted by the Early Intervention Performance and Strategic Intelligence team and provides an indication of how the population is growing and therefore the impact on the childcare market.

Supply information on the number, cost and quality of childcare places was largely gathered from the Ofsted data held within the sufficiency department. Additional data was gathered from childcare providers via telephone calls and email updates.

Please note that all the details in this report were accurate as at July 2019 but that numbers of children, setting details including prices change constantly.

There are a number of factors that affect the demand and ability to pay for childcare. It is necessary to consider these wider issues when considering how demand levels may differ in particular areas of the borough.

As part of the strategy to deliver services more effectively, the borough has been re-aligned into six locality areas with the intention of bringing services closer to the communities they serve. These localities replace the Planning Areas previously in place. Please see page 11 for the detailed ward breakdown by locality.



3. About Croydon¹

Croydon is an outer London borough and is in the far south of London, making it London's southern-most borough. It covers an area of 87 square kilometres. To the very north of the borough, the five local authorities of Croydon, Lambeth, Southwark, Bromley and Lewisham meet, whilst to the south Croydon borders Surrey. To the north-east, east and south-east of Croydon the borders are with the London Borough of Bromley, whilst to the west the borders are with the London Boroughs of Sutton and Merton.

Population – Croydon has the second largest population of all London Boroughs at 384,837 just behind Barnet. Croydon has the largest population of young people in London: 22.2% (85,728) of the population are aged 0–15 years. Croydon also has a large population of working age adults, 64.5% of the population are aged 16-64, whilst the proportion of older adults, aged 65+, is much lower than the national average making up only 13.4% of the population² (ONS mid-2017 population estimates).

Migration – Based on the latest figures for 2016, domestic migration has had little impact on the growth of the Croydon population. 20,700 people moved into the borough whilst 23,700 people left the borough to go to other areas of the UK. The international inflows into Croydon continue to exceed the international outflows and this results in more migrants from outside the UK. For 2016, the ONS has estimated that around 11% of the Croydon population is made up of members from the EU and about 8% come from the rest of the World.

Ethnicity – Croydon has a diverse population; its communities speak more than 100 different languages and as with other London boroughs, Croydon has a higher proportion of residents from black and minority ethnic backgrounds than the national average. According to the Census 2011, the younger population is more diverse than the older population in Croydon.

Economy – The top three industries in Croydon, which accounted for nearly half of all businesses in the area in 2018 were professional, scientific and technical; construction and information and communication³.

There are fewer jobs in Croydon per head of population than the London average, with many residents commuting to work in other areas, such as central London. The high proportion of residents commuting to central London is one of the factors that influences the difference between the average earnings of people who work in

¹ Unless stated Croydon data are taken from the Croydon Observatory (<http://www.croydonobservatory.org/>) and the latest Borough profile. Further ward data are also available on the Croydon Observatory.

² Population estimates available at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>

³ ONS (2018) UK Business Activity, Size and Location

<https://www.ons.gov.uk/businessindustryandtrade/business/activitysizeandlocation/datasets/ukbusinessactivitysizeandlocation>

Croydon and those of people who live in Croydon, although it should be noted there is some overlap between the two groups. The average gross earnings for male full-time workers is about £45 higher a week for those who work in Croydon than those who live in Croydon. For female full-time workers it is higher by about £12 a week⁴.

In March 2019, there was an estimated 10,105 people in Croydon claiming out of work benefits. The number has been steadily increasing since March 2017. The proportion of out of work claimants is higher than the London and national (GB) proportion.

Housing – Based on the 2011 Census, at a borough level 70.8% of Croydon residents lived in one family only households⁵, this was an increase of 2.4% compared to the 2001 figure. 25.3% of all households were married couples or couples in a civil partnership living with dependent children, 5.4% were co-habiting couples living with dependent children. 13.1% were a lone parent living with dependent children; the number of lone parent households increased from 17,347 in 2001 to 23,160 households in 2011. The rest of the households in Croydon were one-person households, aged over 65 or had non-dependent children.

According to the 2011 Census, 60.1% of all Croydon households were owner occupied, 22.1% were private rented or rent free households and 17.8% were households living in social housing. Croydon has the largest borough housing stock in London but its social housing stock is smaller than many other London boroughs.

2,449 Croydon residents were recorded as either homeless or in temporary housing as at 31st March 2018. There was a disproportionately high percentage (5 in 10) of homeless people from the Black community. The majority of people in Croydon who applied for help from the council for homelessness were in the 25–44 year old age group (58%); this age group only made up 29% of the total resident population in 2017 (ONS mid-2017 population estimates). The most common reason for homelessness is parental evictions, followed by exclusions by relatives and friends.

Education and skills – 47% of the eligible 2 year old population benefitted from a funded early education place in January 2019⁶. 83% of 3 and 4 year olds benefitted from a funded early education place in January 2019⁶. For both age groups, take up is below the London and England averages.

In 2018 74% of pupils achieved a good level of development in Croydon in the Early Years Foundation Stage (EYFS) in line with London and above England (71.5%)⁷.

⁴ ONS (2018) Annual Survey of Hours and Earnings (ASHE)

⁵ <http://www.croydonobservatory.org/document-library/> The Croydon Household Profile provides detailed information from the 2011 Census about the type of households that make up the borough of Croydon. "There are a range of household types that reflect the living arrangements that exist between people. These are: One person households, one family households (couple with or without children; single parents with child (ren), and Other households: multi-person households including unrelated adults sharing, student households, multi-family households and households of one family and other unrelated adults." ONS Households and Household Composition in England and Wales, 2001-11 http://www.ons.gov.uk/ons/dcp171776_361923.pdf

⁶ Early Years Census, School Census, School Level Annual School Census 2019

⁷ Early Years Foundation Stage Profile attainment data

For Key Stage 1 the proportion of pupils in Croydon achieving the expected standard in reading (77%) in 2018 remains in line with the regional average (78%) but higher than the national average of 75%. In Croydon, 72% of pupils achieved the expected standard in writing which was only just behind the outer London average (73%) and better than the national average (70%).

At Key Stage 2 the proportion of pupils achieving the expected standards for reading, writing and maths has improved from 55% in 2016 to 66% in 2018. Performance is above the national average (64%) but remains below the London average (68%)⁸.

Until 2016, attainment at Key Stage 4 was measured by counting the number of A*-C grades at GCSE. This measure has since changed to Average Attainment 8 score per pupil. This measures the average achievement of pupils in up to 8 qualifications. The average Attainment 8 score in Croydon has decreased from 49.9 in 2015 to 45.7 in 2018. Over the last 3 years, Croydon has been in line with the national average but below the London average.

The latest figure for 2017 showed that 85.5% of young people in Croydon had achieved a Level 2 qualification by the age of 19. This is a poorer performance compared to the previous year (87.0%) but is still close to the national average of 85.6%. 8.4% of A-level students achieved grades AAB or better in 2018, a decrease from 2017 and significantly below the London average (19.5%) and national average (20.6%)¹¹.

Community Safety – The overall number of offences committed in Croydon has fallen in recent years based on the last 10 financial years of reporting. There is a high number of offences in Croydon but the borough has one of the largest populations in London which means that the overall rate of offences per 1,000 population in Croydon is not as high as other parts of London. The number of victims of serious youth violence has increased slightly in recent years.

Croydon is in the top third of London councils for highest domestic abuse incidents with a rate of 18.2 per 1,000 of population for the 12 months rolling to 31st March 2019. Of the total victims of domestic abuse in Croydon, 76% were female. One in 3 (33%) of those subjected to domestic abuse were in the 25-34 year age band. 23% were in the 35-44 year band and 18% were in the 18-24 year band.

There were 1,152 proven offences committed by children age 10-17 in Croydon during the year ending 31st March 2018⁹. This is an increase of 29% on the previous year. By far the highest proportion of proven offences committed is violence against the person. In Croydon, 88% of the youth offenders are male. There is a greater proportion of youth offenders, aged 10-17 years, who are from BAME backgrounds (68.9%). This is above the proportion of BAME offenders in London (63.5%). The

⁸ DfE LAIT, data released October 2018.

⁹ Youth Justice Board.

proportion for England and Wales is much lower at 25.6% for the same period. There continues to be a disproportionately high percentage of young people from a Black or Black British background amongst the first time entrants in Croydon.

Health – Low birth rate is classified as any weight less than 2,500 grams. The Public Health Profile for 2017 shows that the percentage of low birth weight babies in Croydon was 3.31%. This is higher than the previous year figure of 2.96%. The national average figure for 2017 at 2.82% is also higher than the previous year's figure of 2.79%.

In 2017/2018, childhood immunisation rates in Croydon remained statistically lower than both the London average and the England average for all immunisations. For the year, Croydon failed to meet a single child immunisation national target set at 90% coverage¹⁰.

The proportion of Croydon pupils in Reception year (aged 4-5) measured as having excess weight was 22.0% in the latest year (2017/2018)¹¹. This is in line with both the London average at 21.8% and the national rate at 22.4%. The proportion of Croydon pupils in Year 6 measured as having excess weight was 38.0% (2017/2018) and remains in line with the London average (37.7%) but higher than the England average (34.3%).

In the last 20 years life expectancy in Croydon has progressively increased. For males the life expectancy from birth increased from around 74 years in 1991-1993 to 80.3 years in 2014-2016, this is in line with the average for London (80.4) and slightly higher than the England average of 79.5. Similarly life expectancy from birth for females has increased from just over 79 years to 83.6 years in the same period, however this is slightly below the London average of 84.2 years but similar to the England average of 83.1¹².

Deprivation – Croydon became relatively more deprived compared to other local authorities in England between 2010 and 2015 according to the Index of Multiple Deprivation (produced by DCLG). The Index of Multiple Deprivation looks at a range of different aspects of deprivation: income, education skills and training, employment, health deprivation and disability, barriers to housing and services, crime, and living environment deprivation. There continues to be geographic inequality in the distribution of deprivation in the borough with the north and south-east of the borough remaining more deprived. Some wards have low levels of disadvantage whilst others are amongst the most deprived in England.

The Index Deprivation Affecting Children Index (IDACI) is a supplementary index looking at the proportion of children in an area that are living in families affected by

¹⁰ PHE, Public Health Outcomes Framework (based on NHS Cover of Vaccination Evaluated Rapidly (COVER) data)

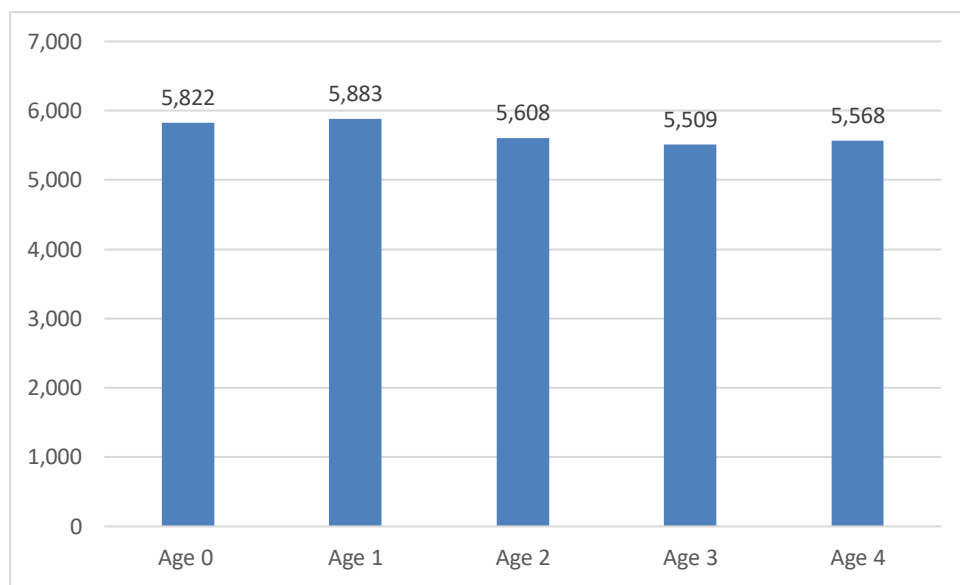
¹¹ PHE, NCMP Profiles (based on National Childhood Measurement Programme data)

¹² 1991-1993 data from Borough Profile. 2014-2016 data from PHE's Children and Young People's Health Benchmarking Tool.

income deprivation. In Croydon, 23.2% of children were living in families affected by income deprivation. 4% of the LSOAs were in the top 10 most deprived LSOAs in the country.

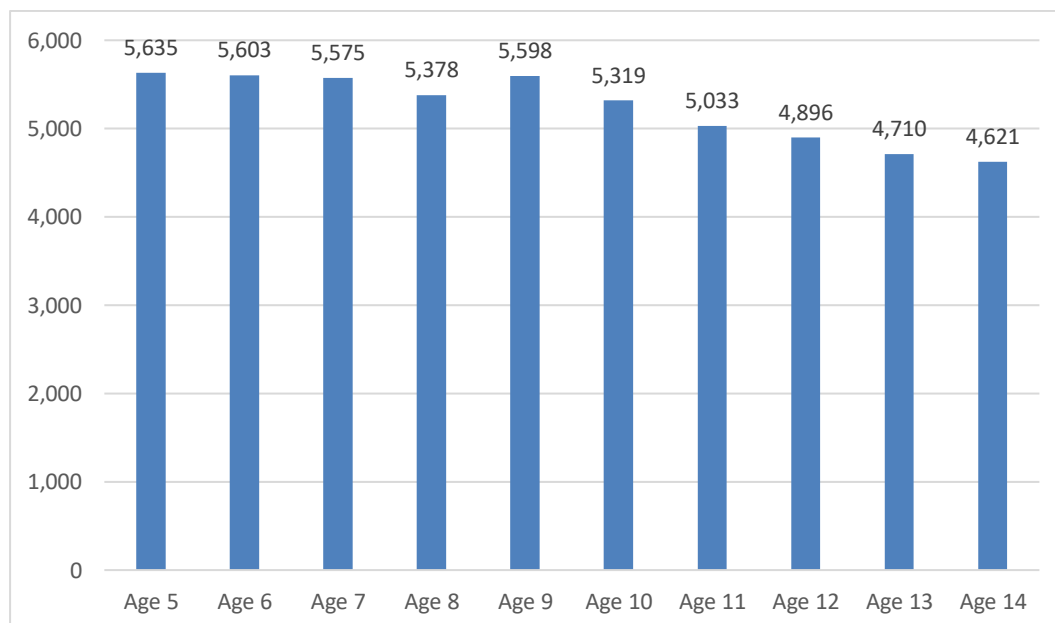
Current population figures – Based on the 2011 census there are 22,044 families with children aged under 5 living in Croydon. Using the latest mid-year population estimates (2017) these have risen to 28,390 children aged under 5 and 52,368 aged 5 to 14 in Croydon. This is detailed in the table below.

Figure 1 – Number of children aged under 5 living in Croydon



Source: ONS Mid-2017 population estimates

Figure 2 – Number of children aged 5 to 14 living in Croydon



Source: ONS Mid-2017 population estimates

4. Childcare in Croydon

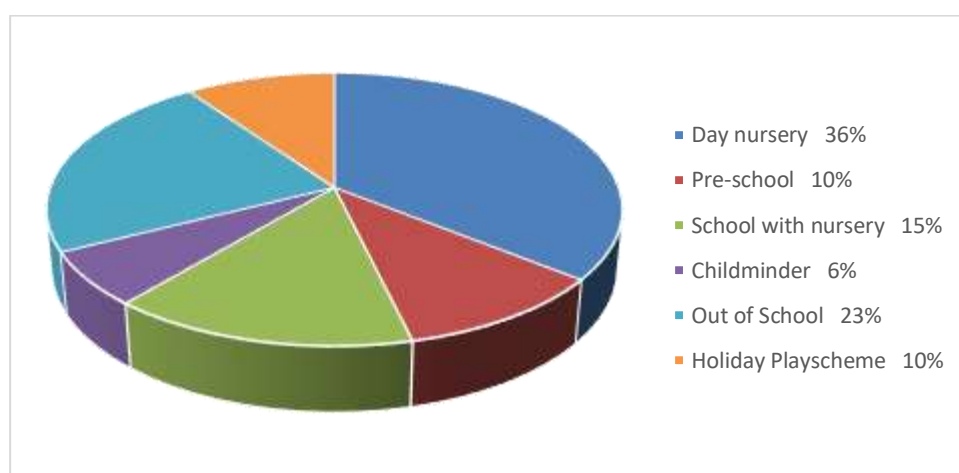
Supply of childcare

For the purposes of this assessment the supply of formal childcare includes private day nurseries, pre-schools, schools with nursery provision, childminders (funded childminders are accredited to deliver the free entitlement on behalf of the local authority), out of school clubs and holiday clubs.

Schools offering out of school provision are exempt from separate registration on the Ofsted Childcare Register but are included within the data. However crèches are not included as any care of less than three hours is not required to register with Ofsted.

Childcare places

In total the 698 providers offer 15,415 childcare places. The distribution of places by provider is shown below.



In Croydon there are an estimated 19 childcare places per 100 children based on 80,758 children aged 0 to 14 years.

Quality of childcare in Croydon

Ofsted inspect all registered provision and the table below shows the current quality judgements along with the national average.

	Outstanding		Good		Sub-total	Requires Improvement		Inadequate		Awaiting	
Day nurseries	11	12%	75	84%	96%	2	2%	2	2%	16	n/a
Pre-school	12	27%	33	73%	100%	0	0%	0	0%	1	n/a
Schools with nursery	13	29%	27	60%	89%	5	11%	0	0%	13	n/a
Childminders	44	14%	235	76%	90%	6	2%	24	8%	85	n/a
Out of School	9	18%	35	72%	90%	3	6%	2	4%	24	n/a
Holiday Playschemes	2	13%	12	80%	93%	0	0%	1	7%	5	n/a

Ofsted's national figures as at 31.3.19 state that the proportion of childcare providers on the Early Years Register judged to be good or outstanding was 95%. This is slightly better than the London average of 93% but within London the differential between childcare on non-domestic premises (96%) and childminders (92%) is greatest.

Childcare providers

Across the London Borough of Croydon there are a total of 656 Ofsted/Independent School Inspectorate registered childcare providers. In addition, there are 40 school run breakfast and/or after school and holiday clubs, which come under the school's registration. This gives a total of 698 childcare providers.

The table below shows the geographical distribution of the various types of provision against the 28 wards within Croydon as at July 2019.

	Locality	No.of under 5YOs	DN	PS	SCH w N	CM		OOS	HP
						Funded	Not funded		
Bensham Manor	NW	1277	6	0	2	7	14	2	1
Norbury Park	NW	834	4	2	3	6	14	3	1
Norbury & Pollards Hill	NW	818	5	3	1	8	6	1	1
West Thornton	NW	1541	7	1	1	6	12	3	2
Crystal Palace & Upper Norwood	NE	1232	2	2	4	2	13	4	0
South Norwood	NE	1465	3	2	3	7	7	4	2
Thornton Heath	NE	1460	9	1	3	5	27	2	0
Addiscombe West	CW	1296	3	4	3	8	10	2	0
Broad Green	CW	1809	4	1	2	3	11	3	0
Fairfield	CW	1102	5	2	1	1	2	3	2
Selhurst	CW	891	5	2	2	3	5	2	1
South Croydon	CW	1349	9	1	4	3	14	6	0
Waddon	CW	1699	6	2	2	0	9	4	2
Addiscombe East	CE	635	3	1	0	2	9	2	1
Park Hill & Whitgift	CE	392	1	0	0	1	2	1	1
Shirley North	CE	819	1	4	2	7	16	2	0
Shirley South	CE	611	4	0	1	3	11	4	1
Woodside	CE	1398	5	1	2	10	17	2	1
Coulsdon Town	SW	589	3	1	2	5	14	2	1
Kenley	SW	689	5	0	1	2	8	4	1
Old Coulsdon	SW	784	2	2	1	7	5	2	1
Purley & Woodcote	SW	1153	3	2	5	0	10	4	0
Purley Oaks & Riddlesdown	SW	718	2	0	2	1	4	0	0
New Addington North	SE	971	1	2	4	1	7	3	0
New Addington South	SE	848	2	2	2	4	11	2	0
Selsdon & Addington Village	SE	668	0	2	2	1	10	2	1
Selsdon Vale & Forestdale	SE	526	3	2	1	4	7	2	0
Sanderstead	SE	816	3	4	2	6	6	3	0

Total		106	46	58	113	281	74	20
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Key

DN - Day nursery

PS - Pre-school or sessional and term time

SCH w N - Schools with nursery provision

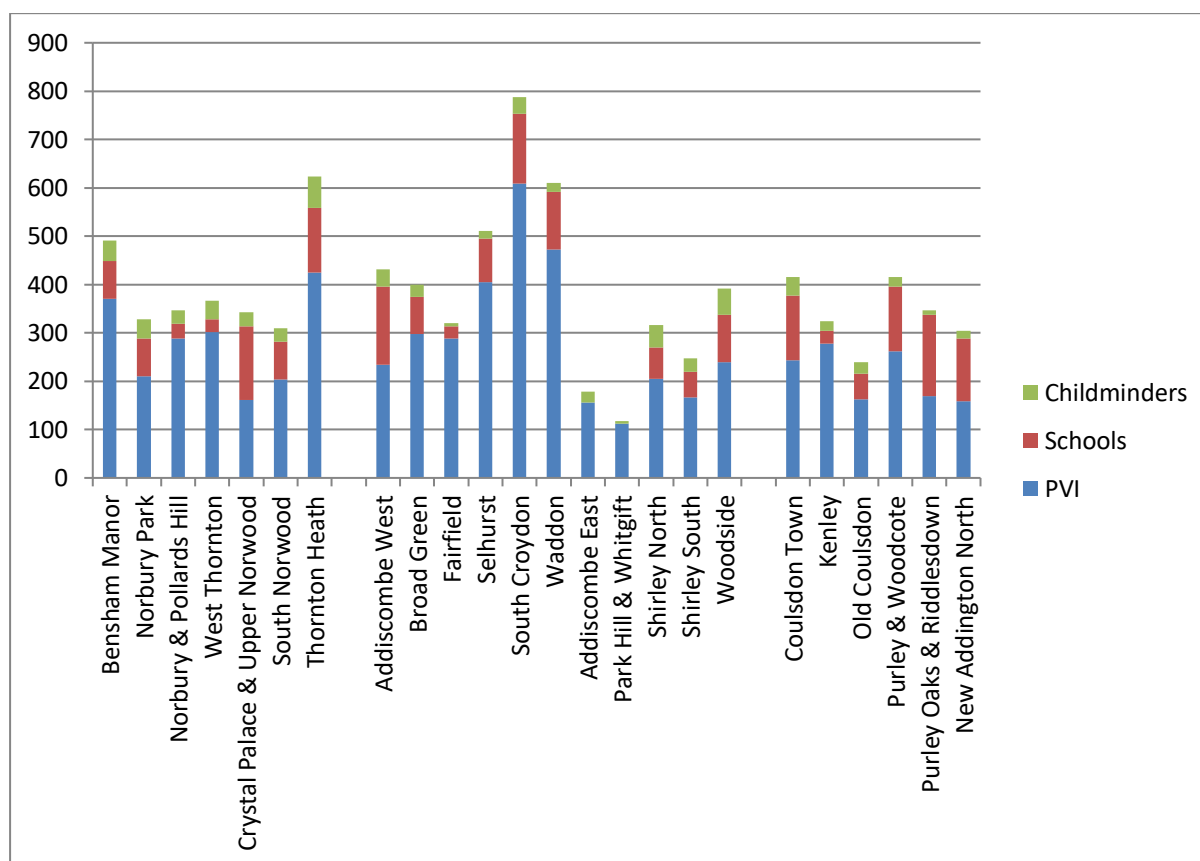
CM - Childminder; funded childminders offer free entitlement places

OOS - Breakfast & Out of School club

HP - Holiday Playscheme

Early Years Childcare

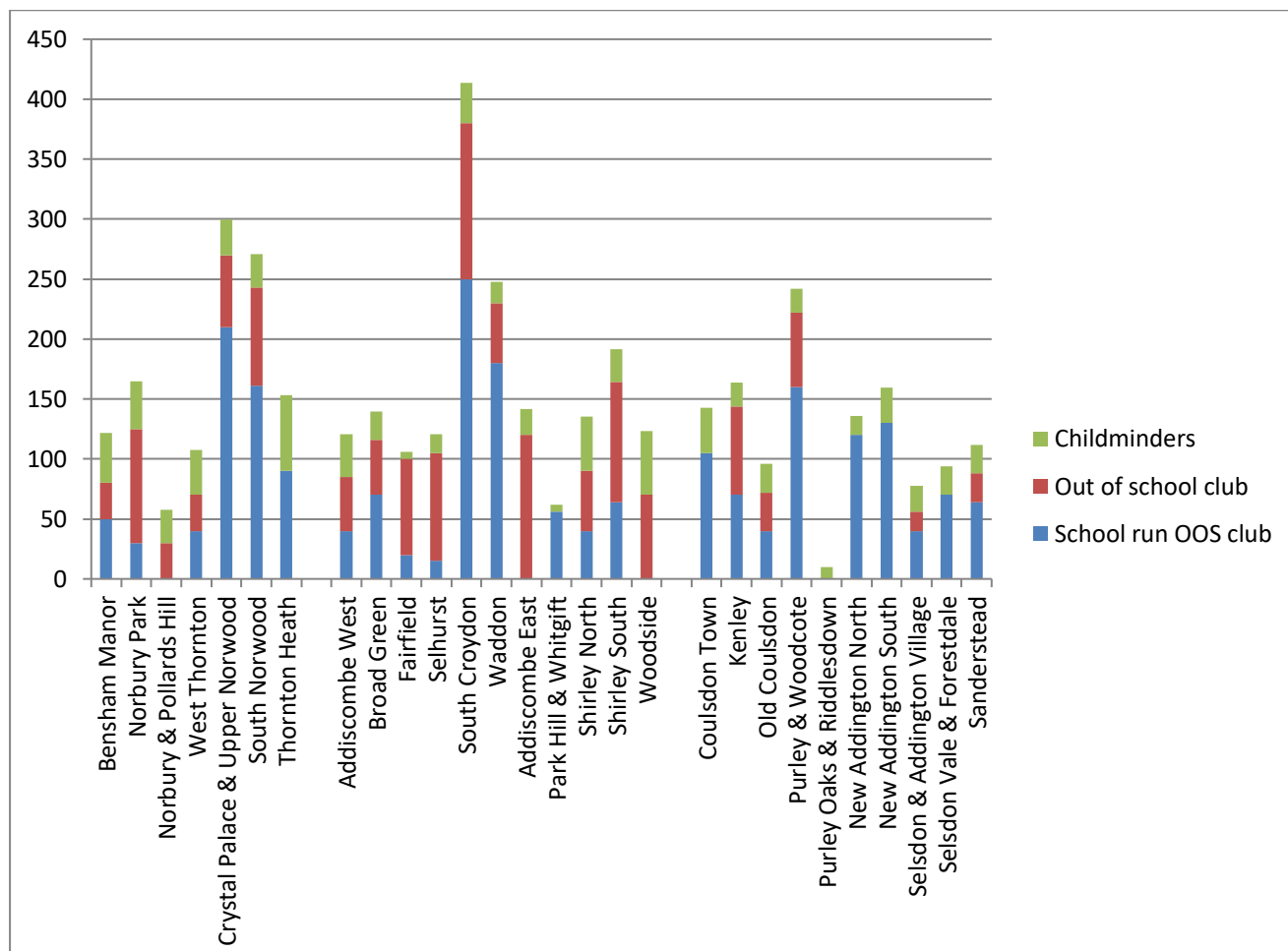
In Croydon there are currently 10,411 day care places for pre-school children aged 0 to 4 years. This is comprised of 7,133 nursery places in private settings, 2,293 via school provision and 985 with childminders; full details on previous page. Based on the mid-2017 population estimate of 28,390 this equates to 37 full-time places per 100 children aged 0 to 4 years across the borough.



However this varies across the borough but the high concentration of nursery provision in specific areas will also serve families living or travelling to neighbouring areas. Therefore any potential over or under supply of places should be considered within this context, please see pages 22 to 24 for more information.

Out of School Childcare

Out of school childcare comprises of before and after school clubs as well as provision offered by childminders. In total there are 3,431 out of school places available at out of school clubs with up to 780* additional spaces available with childminders. This equates to 7 places per 100 children aged 5 to 15 years (including disabled children) using the mid-2017 population estimate of 57,338.



* Please note that the figure of 780 childminder places is based on 66% of childminders offering 3 spaces.

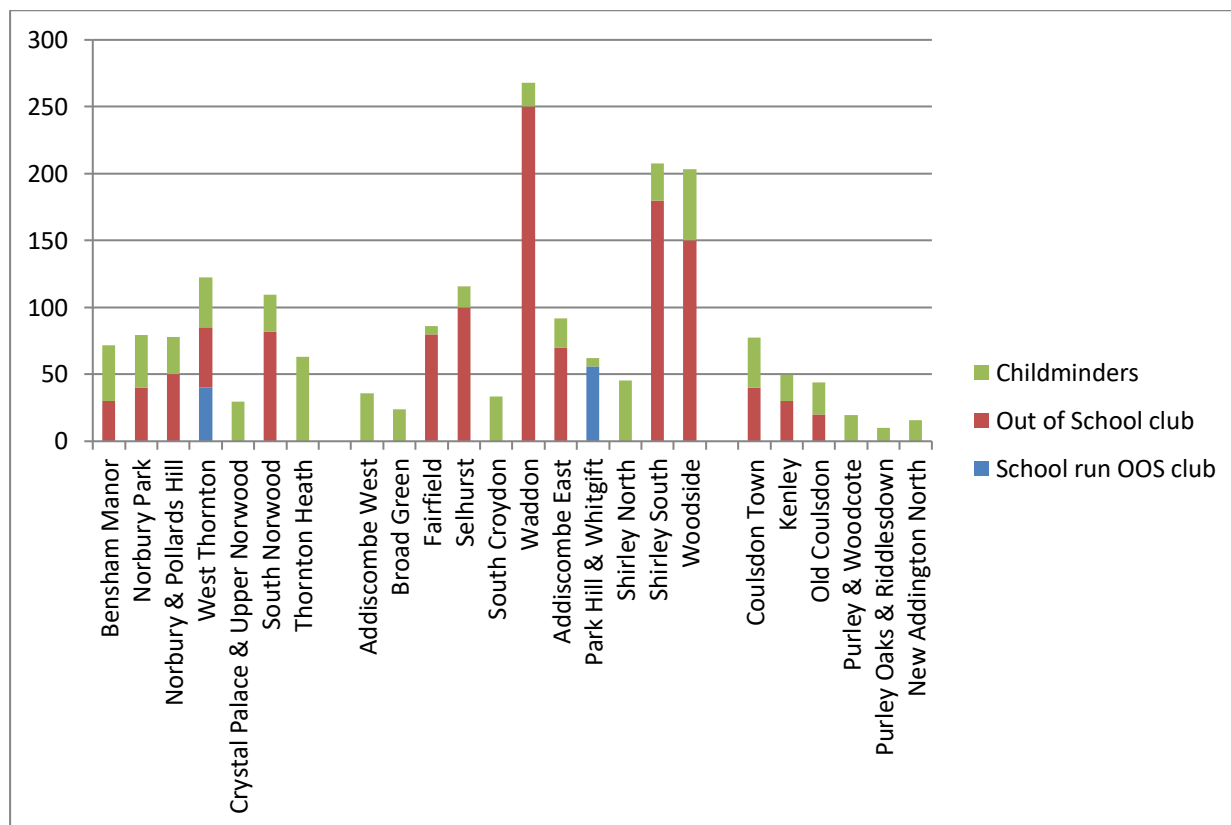
When considering the accessibility of out of school childcare, it is important to consider the number of schools served by individual clubs or childminders rather than a club's proximity to a child's home.

The borough average hourly rate for breakfast clubs is £4.16 and £4.27 for after school.

Holiday Care

Holiday childcare includes holiday playschemes as well as provision offered by childminders. In total there are 1,513 out of school places available at holiday clubs with up to 780* additional spaces available with childminders. This equates to 4 places per 100 children aged 5 to 15 years (including disabled children).

The average hourly rate across the borough for a holiday club is £3.13



* Please note that the figure of 780 childminder places is based on 66% of childminders offering 3 spaces.

5. Qualification levels in Croydon

Each year the Department of Education instructs local authorities on what data to collect within the Early Years census and in January 19 the information replicated the straightforward count of qualified staff requested in 2018.

The current statutory guidance dictates minimum qualified staffing levels and can be summarised as:

For children under 2: 1:3 staff to child ratio

For children aged 2: 1:4 staff to child ratio

For children aged 3 and over: 1:8 staff to child ratio

Irrespective of the child's age, at least one member of staff must hold a full and relevant level 3 qualification and at least half of all other staff must hold a full and relevant level 2 qualification. However please note that for children aged 3 and over this ratio changes to 1:13 when a person with Qualified Teacher Status or Early Years Professional Status (level 6 qualified) is working directly with the children; there is no difference to the ratios for younger children when cared for by a level 6 qualified person.

In addition anyone completing a level 2 or 3 qualification on or after 30th June 2016 must also have either a full or emergency Paediatric First Aid certificate within 3 months of starting work to count in qualified staff ratios.

According to census information received in January 2019 staff qualifications in the Private, Voluntary and Independent (PVI) daycare sector can be summarised as shown below.

	Total number of staff	L2 qualified staff	L3 qualified staff	QTS/EYPS/EYT	Unqualified
Day nurseries (106)	1,329	251 (19%)	762 (57%)	74 (6%)	242 (18%)
Pre-schools (46)	335	33 (10%)	254 (76%)	14 (4%)	34 (10%)
Total	1,664	284 (17%)	1,016 (61%)	88 (5%)	276 (17%)

In terms of total staff numbers, day nurseries have an average of 63% of total staff team qualified at Level 3 or above and pre-schools have an average of 80% of total staff qualified at Level 3 or above. This produces a Croydon average of 66% of early years' staff qualified at Level 3 or above which is an improvement on last year's figure of 63% despite the universally acknowledged shortage of qualified staff.

6. Early Years Funding

Take up of 3 and 4 year old funding

All 3 and 4 year olds are entitled to 15 hours of childcare a week over 38 weeks (570 hours) this is known as the universal offer. Parents can access their entitlement over a longer period of time known as the stretched offer dependent on each setting's individual offer.

In September 2017 the government introduced '30 hours' whereby working parents of 3 and 4 year old children could apply for an additional 570 hours of funded childcare. The criteria is that both parents need to be working and earning the equivalent of 16 hours a week at minimum wage i.e. approximately £125 subject to an income cap of £100,000 per parent. All applications are made online via the HMRC and successful applications receive an eligibility code. These codes need to be renewed every 3 months to ensure the parents still meet the criteria.

The Department for Education latest figures indicate that within England 94% of 3 and 4 year old children take up their universal free entitlement, within London that figure is lower. The figures over the last four years are shown below:

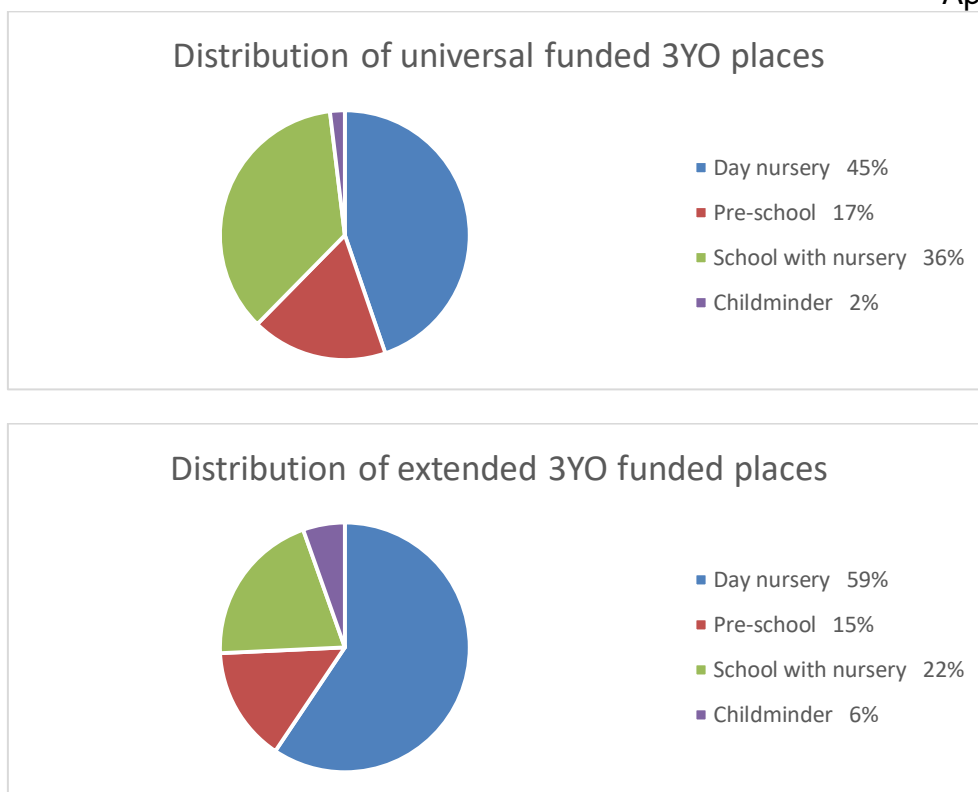
Year	Number 3YOs	%	London average	Number 4YOs	%	London average	Total	%	London average
2016	4805	83%	82%	5118	91%	89%	9923	87%	84%
2017	4581	82%	82%	5104	91%	87%	9685	87%	84%
2018	4540	80%	83%	4741	87%	86%	9281	83%	84%
2019	4622	80%	82%	4721	86%	86%	9343	83%	84%

Taken from Provision for children under 5 years of age in England, January 2019 & published 27.6.19

Based on this year's data Croydon's take up remains just below the London average for the universal entitlement.

However in Croydon the growth of extended hours is double the England average. In January 19 the published take up of extended hours was up 11% on the previous year but in Croydon there was a 23% increase between Spring 18 (1,649 children) and Spring 19 figures (2,031 children). No cross borough comparative statistics have been published for the extended entitlement but government estimates indicate approximately 410,000 children were eligible which would be 30% as a percentage of all 3 and 4 year olds. In Summer 19 2,436 children received extended hours funding which represents 32% of Croydon's 3 and 4 year olds.

The distribution of funded spaces in Summer 19 by provider is shown below:

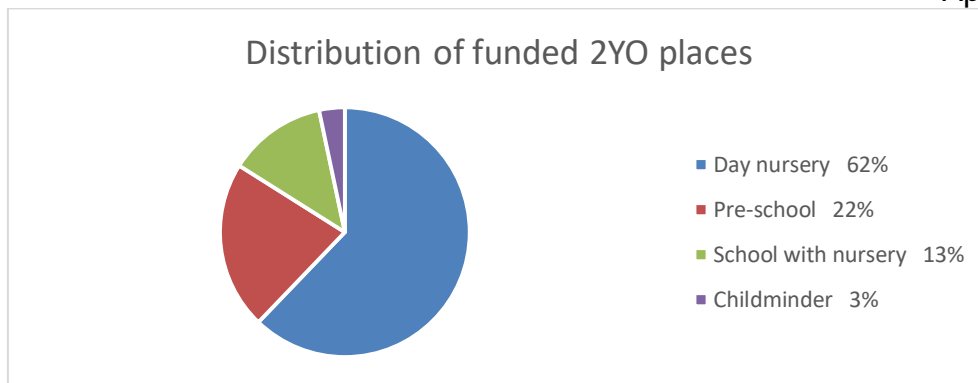


Early Years Pupil Premium (EYPP)

In April 2015 the government introduced EYPP for disadvantaged 3 and 4 year olds. Children are eligible if they are receiving their early years' entitlement and meet the benefits related criteria for free school meals or are in/have left the care of the local authority. The setting receives an additional 53p an hour for any eligible children and the intention is that these funds are used to close any developmental gaps the child may have and to enhance provision for these children.

In the summer term we had 470 pupils eligible for EYPP which is the equivalent of 6% of our total number of children accessing early years funding which is slightly below the January 2019 DfE's 7% percentage. However despite the fact the majority of funded hours are delivered by the private sector, the majority of EYPP claims are from the school sector, 68% of EYPP children are accessing their entitlement in a nursery provision within a maintained school.

The EYPP criteria effectively matches the 2YO funding criteria and as the graph below shows again the majority of 2YO places are delivered by private providers therefore those children would be eligible for EYPP when they turn 3 unless their home circumstances have changed. However private providers have reported a reluctance on behalf of parents to provide the necessary information to run the checks.



2 year old funding (2YO)

40% of 2 year old children are also entitled to 570 hours if the parent is in receipt of:

- Income support
- Income-based Jobseeker's Allowance (JSA)
- Income-related Employment and Support Allowance (ESA)
- Support through part 6 of the Immigration and Asylum Act
- Tax Credits and an annual income of £16,190 or less before tax
- The guaranteed element of State Pension Credit
- The Working Tax Credit 4-week run on
- Universal Credit and a combined annual income from work of £15,400 or less after tax

Or if the child:

- Is looked after by the local authority
- Has a current statement of special educational need or an education, health and care plan
- Receives Disability Living Allowance
- Has left care under a special guardianship order, child arrangement or adoption order

The Department for Work and Pensions (DWP) continue to provide lists to local authorities of potentially eligible families which are used by our children's centres to offer targeted 2YO information.

Parents can complete an online 2YO eligibility check via the Family Space Croydon website and between August last year and this July over 1,700 successful checks have been run but this figure does contain a small number of repeat checks. Croydon's 2YO take up figure has been largely stable but recently we have seen a slight reduction in numbers which potentially is linked to the success of the extended hours.

The Department for Education latest figures indicate that within England 68% of eligible 2YOs are taking up their free entitlement, within London that figure is lower. The figures over the last four years are shown below:

Year	Number of funded Croydon 2YOs	%	London average
2016	1257	53%	57%
2017	1270	66%	58%
2018	1230	82%	61%
2019	1021	47%	56%

Taken from Provision for children under 5 years of age in England, January 2019 & published 27.6.19

Based on this year's data Croydon's take up percentage looks very low and our figures have dipped a little over the last year. However our final termly 2YO count was 1,230 in Summer 18, 1,293 in Autumn 18 and 1,184 in Spring 19; the above figure was the January forecast number rather than the actual end of term figure. In addition, the number of DWP eligible families is also falling from 2,057 in January 19 to 1,621 in June 19. We are watching the 2YO numbers closely but while the actual number of children remains broadly constant there is less concern than the percentage would imply and in Summer 19 there were 1,085 funded 2YOs.

7. Profile outcomes

Local Authorities have a statutory duty to improve outcomes for children which is known as the Early Years Outcome Duty and is often referred to as 'school readiness.' This is measured through the Early Years Foundation Stage Profile at the end of the reception class year when children are 5 years old (or rising 5).

Children who achieve at least "expected" in 12 of the 17 aspects of learning are said to have achieved a Good Level of Development (GLD).

Table 1 shows the percent of children who achieved the GLD in Croydon and nationally. This year's (2019) non-validated data shows that the number of children is, once again, above the national figure, and has improved on last year's figures.

Percentage of children achieving a GLD		
Year	Croydon	National
2015	64.7 %	66.2 %
2016	70.3 %	69.3 %
2017	73.6 %	70.3 %
2018	73.5%	71.5%
2019	74.6% (provisional)	71.8% (provisional)

Table 1

Percentage gap between children eligible for free school meals (FSM) and those not eligible achieving the GLD		
Year	Croydon	National
2015	13 %	18 %
2016	11.5 %	18 %
2017	13.8 %	17%
2018	8%	18%
2019	11.2% (provisional)	18.5% (provisional)

Table 2

Nationally the number of children eligible for Free School Meals has risen slightly from 12.4% of children in 2018 to 12.9% of children in 2019. However in Croydon the number of children claiming FSM has fallen from 21.4% in 2018 to 17.2% in 2019 but still significantly higher than the national figure.

8. Children with SEND (Special Educational Needs and Disability)

Nurseries, pre-schools and childminders across Croydon are supported in developing and maintaining good inclusive practice, in line with the principles of the Early Years Foundation Stage and the 2015 SEND Code of Practice, by the Early Years Inclusion and Intervention Team and the Portage Team.

The Early Years Inclusion and Intervention Team supports private, voluntary and independent settings and childminders through a range of services for children, aged 0-5, who have identified special educational needs and disabilities. These range in severity from mild learning disabilities to profound multiple learning difficulties. The team ensure that a package of support is delivered that reflects the individual needs of the child. This may include individual support packages or whole setting training. The team also provide strategic support to the maintained nursery schools.

The Portage service was reinstated in Croydon in September 2018 following a review of the Early Years SEND provision. Within this review a need to provide parental support and intervention for preschool children with disabilities who were not in education was identified. Prior to the reinstatement of the Portage service families of those children had received educational advice and transition support into nursery or school. The intention is that the Portage model delivers support and advice with sufficient frequency to make an impact on children's developmental progress.

In the academic year 2018-2019 a total of 269 new referrals were received through SPOC by the team at the time of reporting. Of these 198 were children supported within the settings and 71 within the home. There were a further 16 referrals received from health for children who attended a mainstream nursery setting.

When a health care professional identifies that a young child, under 5, may have a special educational needs and/or disabilities they are required by law to tell the local authority. There were a total of 146 health notifications received via direct meetings with Gill Brock, Designated Medical Officer. Approximately 70% of these were already known to Early Help services.

Specialised placements

The local authority has commissioned the following places across the borough:

Rainbow Group (Central) 27 places, 15 main cohort and 12 medical unit
Willow Tree (South) 12 places
Winterbourne (North) 12 places

The team have overall responsibility for children placed in the specialist nursery provisions named above but do not offer regular support as each setting has an allocated Educational Psychologist.

There were 83 new applications for personalised funding agreed and 13 for targeted funding for children attending PVI and maintained settings.

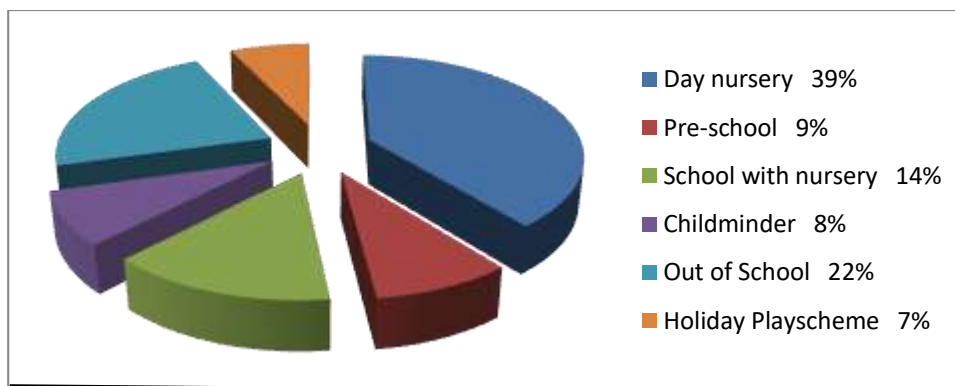
Total number of pre-school children (aged 3-4) with an EHCP or under assessment and setting type:

	Under assessment	EHCP
PVI	20	9
School Nursery	7	8
Nursery School	2	13
Specialist Nursery	2	22
Total	31	52

Whilst this data represents service delivery for children with SEND at a sustained personalised or targeted level, it does not fully depict the wider 'value added' work completed to initially assess needs (within the family home and in settings) in order to ensure that children have received an appropriate graduated response to their SEND. A considerable amount of service delivery involves managing demand and expectation within settings and family intervention for those children whose needs are initially unclear and, through effective, short-term targeted intervention, no longer meet criteria for a long-term intervention. Data is not currently held for this aspect of service delivery but consideration is being given to methods for recording going forward.

9. Childcare in the North

There are seven wards in the North – Bensham Manor, Norbury Park, Norbury & Pollard's Hill and West Thornton constitute the North West and the wards Crystal Palace & Upper Norwood, South Norwood, Thornton Heath are designated as North East. In the North there are 224 childcare providers offering 4,061 places. The distribution of places by provider is shown below.



The Ofsted grades are summarised in the following table

	Outstanding		Good		Requires Improvement		Inadequate		Awaiting	
Day nurseries	0	0%	28	97%	0	0%	1	3%	7	n/a
Pre-school	1	10%	9	90%	0	0%	0	0%	0	n/a
Schools with nursery	2	14%	11	79%	1	7%	0	0%	3	n/a
Childminders	13	13%	79	77%	1	1%	9	9%	32	n/a
Out of School	3	25%	8	67%	1	8%	0	0%	7	n/a
Holiday Playschemes	0	0%	5	100%	0	0%	0	0%	2	n/a

Ofsted's statistics published on 17.7.19 state that as at 31.3.19 95% of childcare on non-domestic premises was Good (75%) or Outstanding (20%), In the North, the figures are 97% for day nurseries and 100% for pre-schools. 90% of childminders were Good (77%) or Outstanding (13%).

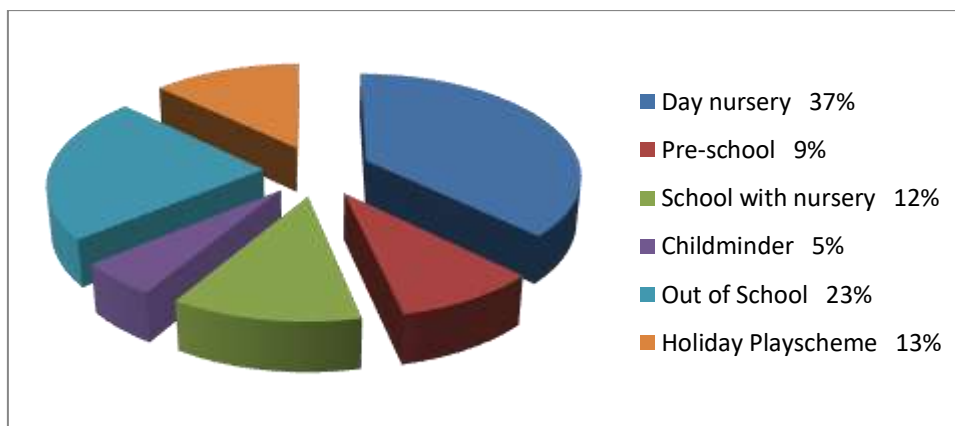
Take up of funding in group provision as at 31.7.19

	No. of 2YOs	% within North	No. of 3&4YOs	% within North	No. of ext. hrs. 3&4 YOs	% within North
Day nurseries	222	77%	851	52%	312	66%
Pre-school	26	9%	162	10%	39	8%
Schools with nursery	41	14%	623	38%	120	26%
Total	289		1636		471	

Therefore although North is home to 30% of the under 5s, group provision delivers: 28% of the borough's funded 2YO places
22% of the borough's funded 3 and 4 year old universal places and
20% of the borough's funded 3 and 4 year old extended entitlement places.

10. Childcare in Central

There are eleven wards in Central – Addiscombe West, Broad Green, Fairfield, Selhurst, South Croydon and Waddon constitute Central West and the wards Addiscombe East, Park Hill & Whitgift, Shirley North, Shirley South and Woodside are designated as Central East. In Central there are 270 providers offering 6,844 places. The distribution of places by provider is shown below.



The Ofsted grades are summarised in the following table

	Outstanding		Good		Requires Improvement		Inadequate		Awaiting	
Day nurseries	6	15%	32	80%	1	2.5%	1	2.5%	6	n/a
Pre-school	7	39%	11	61%	0	0%	0	0%	0	n/a
Schools with nursery	3	22%	9	60%	3	20%	0	0%	4	n/a
Childminders	13	11%	92	77%	5	4%	9	8%	28	n/a
Out of School	3	15%	15	75%	1	5%	1	5%	10	n/a
Holiday Playschemes	1	12.5%	6	75%	0	0%	1	12.5%	1	n/a

Ofsted's statistics published on 17.7.19 state that as at 31.3.19 95% of childcare on non-domestic premises was Good (75%) or Outstanding (20%), In Central, the figures are 95% for day nurseries and 100% for pre-schools. 88% of childminders were Good (77%) or Outstanding (11%).

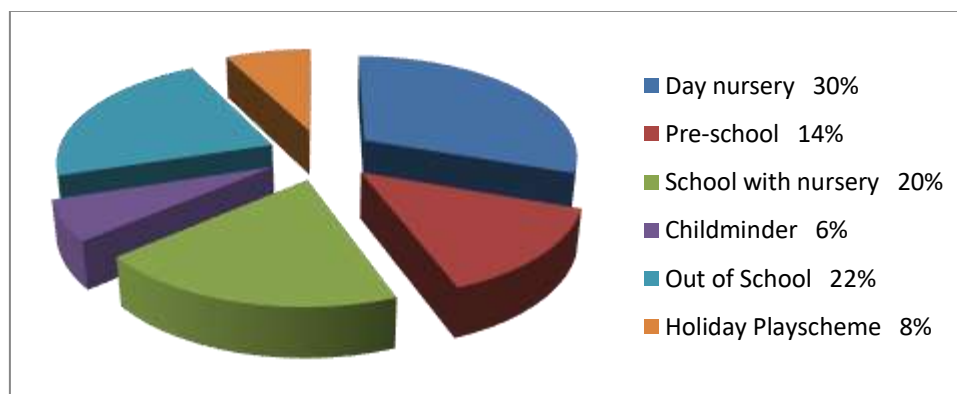
Take up of funding in group provision as at 31.7.19

	No. of 2YOs	% within PA2	No. of 3&4YOs	% within PA2	No. of ext. hrs. 3&4 YOs	% within PA2
Day nurseries	332	58%	1694	48%	736	69%
Pre-school	120	28%	662	18%	164	15%
Schools with nursery	83	14%	1206	34%	174	16%
Total	535		3562		1074	

Therefore although Central is home to 42% of the under 5s, group provision delivers: 51% of the borough's funded 2YO places 48% of the borough's funded 3 and 4 year old universal places and 47% of the borough's funded 3 and 4 year old extended entitlement places.

11. Childcare in the South

There are ten wards in the South – Coulsdon Town, Kenley, Old Coulsdon, Purley & Woodcote and Purley Oaks & Riddlesdown constitute the South West and the wards New Addington North, New Addington South, Selsdon & Addington Village, Selsdon Vale & Forestdale and Sanderstead are designated as South East. In the South there are 202 childcare providers offering 4,510 places. The distribution of places by provider is shown below.



The Ofsted grades are summarised in the following table

	Outstanding		Good		Requires Improvement		Inadequate		Awaiting	
Day nurseries	5	24%	15	71%	1	5%	0	0%	3	n/a
Pre-school	4	24%	13	76%	0	0%	0	0%	0	n/a
Schools with nursery	8	50%	7	44%	1	6%	0	0%	6	n/a
Childminders	18	20%	64	73%	0	0%	6	7%	25	n/a
Out of School	3	18%	12	70%	1	6%	1	6%	7	n/a
Holiday Playschemes	1	50%	1	50%	0	0%	0	0%	2	n/a

Ofsted's statistics published on 17.7.19 state that as at 31.3.19 95% of childcare on non-domestic premises was Good (75%) or Outstanding (20%), In the South, the figures are 95% for day nurseries and 100% for pre-schools. 93% of childminders were Good (73%) or Outstanding (20%).

Take up of funding in group provision as at 31.7.19

	No. of 2YOs	% within PA3	No. of 3&4YOs	% within PA3	No. of ext. hrs. 3&4 YOs	% within PA3
Day nurseries	120	57%	863	38%	399	53%
Pre-school	90	18%	519	23%	159	21%
Schools with nursery	14	6%	891	39%	201	26%
Total	224		2273		759	

Therefore although South is home to 27% of the under 5s, group provision delivers: 21% of the borough's funded 2YO places
30% of the borough's funded 3 and 4 year old universal places and
33% of the borough's funded 3 and 4 year old extended entitlement places.

12. Cost of childcare

The table below shows the average hourly rate for day nurseries and the average hourly sessional rate for pre-schools across each of the three areas.

	0-2 years	2-3 years	3-5 years
North			
Day nursery	£5.79	£5.50	£5.39
Pre-school	£6.50	£6.33	£5.90
Central			
Day nursery	£5.58	£5.41	£5.25
Pre-school	n/a	£5.54	£5.44
South			
Day nursery	£5.63	£5.46	£5.32
Pre-school	n/a	£5.66	£5.47
Borough average			
Day nursery	£5.67	£5.46	£5.32
Pre-school	£6.50	£5.84	£5.60
Childminder	£6.09	£6.09	£6.09

The current funding rates from the Direct School Grant are as shown:

2YOs are funded at £5.66 per hour

3YOs are funded at £4.65 per hour

However the introduction of the single funding formula requires local authorities to pass through 95% of the government rate, Croydon are paid £5.13 therefore in addition to the above, a group setting will also receive the following additional funds:

Deprivation uplift, this is calculated based on the child's postcode and run against the IDACI scales with payments tiered according to level of deprivation. Band 1 corresponds to postcodes in the 10% most deprived areas and Band 2 to the next 10% to 20% most deprived. This year the amounts paid are £216.55 for those in decile 1 i.e. the 10% most deprived postcodes and £180 for decile 2 i.e. the next 10% to 20% of deprived postcodes. Given the variable nature of postcodes it is almost impossible to anticipate levels of IMD (Index of Multiple Deprivation).

All group settings in Croydon are paid as described above with the exception of the five nursery schools who also receive a Maintained Nursery School supplement from central government.

According to the Coram Family and Childcare's "Childcare Survey 2019", in Outer London the hourly rate

for a child under 2 is £6.04 and £5.74 for an over 2 in nursery and

for a child under 2 is £5.75 and £5.55 for an over 2 at a childminder.

13. Childcare compared to last sufficiency assessment in 2018

Croydon continues to have a diverse range of childcare providers – we have several small independent one-site providers, 22 providers who operate more than one setting within Croydon and/or the neighbouring boroughs including 3 of the large chains and two franchised nurseries.

Childminders

The number of childminders has decreased from 410 to 394, a net overall reduction of 16 which is in keeping with national trends. However we are seeing a steady flow of new childminders with 37 registering in the last year. The percentage of childminders eligible to deliver funding has again increased with 29% offering funded places despite being significantly less than their average hourly rate which has increased by 25p. Childminders are the only sector to offer weekend care.

Pre-schools

Over the course of the year another two term time settings closed, one was a morning only provision in a church hall and the other site now has a new day nursery operating. There are only 5 pre-schools who do not offer more than 15 hours. A small number of pre-schools are unable to offer a full 30 hour service because of shared premises and the halls being used for other activities but most offer 30 hours. The average hourly cost has risen significantly by 73p this year as given the limited opening hours pre-schools need to charge a realistic rate for any hours being privately purchased as the vast majority of their hours are local authority funded places and there is therefore limited opportunity to charge for additional services.

Day Nurseries

The number of day nurseries in the borough has increased this year with five new sites registered including a Forest School. In addition two previously registered but dormant properties have re-opened with new providers and four sites changed provider. Three nurseries are not yet accredited to deliver funding and only two providers have chosen not to offer the 30 hours of extended entitlement. Average costs per hour have risen by 12p for 0-2 years, 19p for 2-3 years and 18p for 3-5 years, each age band has a different legally stated adult:child ratio. These increases represent an annual increase of approximately 3% which while higher than inflation reflects the additional costs being placed on individual businesses in terms of business rates and staff wages and pensions. Across the borough opening hours remain largely unchanged from last year and although non-core hours can be accessed at various settings it would appear that there is limited demand for very early mornings, late evenings or weekends.

Out of school care

The number of out of school clubs in the borough has fallen by 6 with the average cost of a 1.5 hour breakfast club being £6.24 (up from £6.07) and £12.81 (down from £12.99) for a 3 hour after school club.

The number of holiday schemes in the borough has decreased by 9 and the average daily rate for 10 hours is £31.30, a decrease of 4p on last year.

The number of Tuition Centres (currently 21) often focussing on key skills such as literacy and numeracy across all age ranges continues to increase year on year.

Parental Childcare Questionnaire

This year we posted an online childcare questionnaire on the Croydon website for four weeks from 29th June to 26th July. The questions focus on type of childcare used, satisfaction levels, reason for using, barriers and knowledge of available funded childcare, see page 30 for the actual questionnaire.

The key facts and future considerations are detailed below:

There were 274 respondents which is more than double last year's response and probably the result of promotion via the Best Start Facebook page and the council Facebook and Twitter accounts.

Within the early years' sector i.e. 0 to 4 years, the most popular choice of childcare was a day nursery at 44% but 19% of respondents also chose a pre-school with a further 10% using a childminder and 20% use family and friends. However it should be noted that some 78% of respondents selected more than one option but given the distribution of summer funded places detailed on page 16, schools are under-represented in this survey as only 10% of parents cited a school provision. The vast majority of respondents (85%) are happy with their childcare but of those who were unhappy, the main reason is cost although three parents raised concerns over staffing.

The majority of school age responses don't use any childcare (58%) but of those who do, the most popular care was after-school provision (43%). However an identical number of respondents (24%) use informal childcare by family and friends as use a breakfast club. The take up of holiday care is the lowest category with only 5% using this service. Again 85% are satisfied with their childcare but four dissatisfied parents cited a lack of holiday provision.

77% of respondents use childcare to facilitate work but half of this number acknowledge that it also benefits the child in terms of education and social enjoyment. The main barrier to using childcare is cost although 22 parents cited session times which will again be inextricably linked to cost as the majority of providers offer early start or late finish as an additional service to the standard day.

According to the survey responses,

82% of respondents claimed to be aware of 2YO funding
 86% of respondents claimed to be aware of universal 3YO funding and
 82% of respondents claimed to be aware of the extended entitlement for 3YOs

Only 18% of respondents used Family Space Croydon to search for childcare which has significant implications for the local authority as that is the main website that parents are signposted to containing all our registered childcare and early years' information. The vast majority of responses are saying they have never heard of it.

Identified Issues and Actions

Support for the sector

The Best Start Early Learning Collaboration have been commissioned to support the childcare sector and the contract sits within the Commissioning and Procurement team. They regularly review the key performance indicators covering take-up of training, Learning Community events, apprentice placements and setting quality in terms of Ofsted grades, support programmes and inspection preparation visits.

2018 Action	Progress	Status
Continue to monitor the take up of 30 hour entitlement places and the impact this may have on overall market capacity.	Take up of the 30 hour offer has grown steadily and in Summer 19 almost a third of our 3/4YOs were accessing an additional 15 funded hours. However there has been a slight drop in the number of funded 2YOs so further investigation is required.	Ongoing
Portal information will be fed into our sufficiency analysis and reviewed in conjunction with ward data about tax credits and working families in attempt to identify trends, patterns and potential hot spots.	This year's data reflects the new ward boundaries which means we no longer have a direct comparison with last year. However this year we have included the under 4 population ward data which shows the pressure on places in Central as they are effectively a net importer of children in addition to homing 42% of the borough's under 4s.	Completed
Introduce a new online parental questionnaire.	Revised version used this year which indicated that very few parents were aware of the Family Space Croydon website but more work required on questionnaire structure.	Ongoing
Encourage settings to provide us with termly vacancy information which again will be very useful for parents.	Following a successful recruitment the 2.6 sufficiency team is now complete and vacancy information is now regularly requested, provided by the sector and updated.	Completed
Update the Provider Agreement to reflect recent developments including privacy statements, term time only claims, removal from the directory of providers.	As a result of management restructures and department realignment, there has been a marked increase in involvement with early years' finances which has resulted in this task not being completed.	Outstanding
Review how effective partnership arrangements between providers are in terms of sharing observations about children and general transition.	Transition is working well across the sector but providers rarely share observations and next steps. This area will be addressed within the Provider Agreement update with the universal hour provider taking the responsibility for liaising with other providers.	Completed

Family Space Croydon upgrades.	All information has been updated and realigned within the new wards. The website is currently being upgraded to give us increased upload capabilities and improve display on mobiles which analysis shows is how it is most commonly accessed.	Ongoing
New online 2YO portal introduced.	Our data handling has improved and we now have more rigorous checking systems in place. The service is also well used by parents and we have on average over 150 successful applicants every month.	Completed
Restructured SEND service.	As can be seen (p.20/21) there is a new format to the SEND reporting and internally there are stronger links between professionals and across teams e.g.SEND payments requested alongside other early years payments.	Complete
Contact the out of school sector with a view to promoting sign up to Tax Free Childcare as we believe this is an area that could benefit both parents and providers.	Out of school contacted and TFC sign up encouraged but limited feedback although our registration document has been amended to include this information.	Completed

2019 Actions and Overview

1. Continue with upgrades to Family Space. Over the last year we have been able to analyse site usage and as a result we are having modifications made to improve the site look as the majority of users are accessing via their mobile phone. In addition, we are increasing our ability to upload useful documents and have requested a new one-line promotional message. We intend to use this to highlight legislation changes and also signposting to current initiatives and information such as Healthy Child London, school application dates, 30 hour code renewal reminders, local family events etc.
2. As mentioned previously we were concerned by the lack of parental awareness of Family Space Croydon therefore we need to review this and identify how the site can be promoted especially as we are now receiving regular sector vacancy information and have improved the information available to parents e.g. a Parent & Toddler timetable showing what groups are on and when.
3. The Provider Agreement should be updated and we are hoping to include not only more information about how funding works but also clarify removal from the directory following audit visits that highlight significant areas of concern.
4. In order to ensure that the information received from the Parental Childcare questionnaire can be used to best effect, more work needs to be done on the question structure and also consider whether responses should be

anonymous as currently we have no data on where respondents live nor the ability to explore further any issues raised.

Although local authorities have a duty to ensure that there is sufficient childcare, they have limited mechanisms to affect the supply as the majority of funded places in Croydon are delivered by the private sector. Financial factors clearly play an important role in what type of funded offer is available and although the Early Years National Funding Formula guaranteed a 95% pass through rate for providers, it also effectively removed the ability for local authorities to incentivise and support places e.g. 2YO places that may be less cost effective.

Demand for early years' places is also difficult to predict as early education is not statutory and while there is a wealth of research about the benefits of early education, ultimately it is still a parental choice. Price and availability of specific hours will also play a part and are inextricably linked to demand as full day providers offer a variety of funded offers to parents that also need to accommodate business considerations and while pre-schools offer more affordable packages they are by definition term-time. As already mentioned we are monitoring our 2YO places closely along with the growing numbers of extended hours' places which again are difficult to predict given that parents need to re-confirm their circumstances every three months to remain eligible.

At this point in time we believe we have sufficient childcare available across the borough. However in September 2019 Ofsted are introducing a new inspection framework which will inevitably effect Ofsted judgements which are key when placing funded 2YOs but given the high number of funded childminders there is still considerable capacity within that specific sector to nurture our youngest children.

Unfortunately as a result of the ward boundaries being re-drawn, it is not possible to directly compare to last year. However the inclusion of the under 5 population data by ward is very helpful and allows us to see that there both North and South are effectively exporting children into Central where the main transport links are. At an individual ward level there is a high level of provision in Coulsdon Town, South Croydon and Selhurst; similarly the wards with the least provision are South Norwood, Broad Green and West Thornton.

Although Croydon are constantly reviewing their property portfolio, there are currently no vacant council properties available within the shortfall wards from which a childcare business could be run. Therefore any providers hoping to open a childcare business in Croydon should first establish if there is a local demand for their service and then source their own premises and contact Ofsted regarding registration; the local authority does not offer any pre-registration support nor site visits. However once registered as Active, all providers will be contacted and asked for information to advertise their service on our Family Space Croydon website to which all parents are signposted and offered support from our commissioned partner the Best Start Early Learning Collaboration.

This survey is to find out from parents and carers what their experiences and needs are in relation to childcare. The information will be used to inform our Childcare Sufficiency Assessment which helps us review and plan high quality childcare places across the borough.

We estimate this survey will take approximately 5 minutes to complete. The survey will close on 26th July 2019.

All of your answers will remain confidential and you will not be identified in any way in the reporting and use of this survey.

1. **How old are your children?**

Age	Number of children	Does your child have a Special Educational Need or Disability?
Under 2 years		
Aged 2 years		
Aged 3 to 4 years		
Primary school age		
Secondary school age		

2. **What type of childcare do you use for your children who are below school age?** Please select all that apply.

Childminder	
Day nursery (open all year round)	
Pre-school (term time)	
Nursery class in school	
Standalone nursery school	
Nanny/Au pair	
Family/Friends	

3. **Are you satisfied with the childcare received from all your below school age providers?**

	Yes	No
Childminder		
Day nursery (open all year round)		
Pre-school (term time)		
Nursery class in school		
Standalone nursery school		
Nanny/Au pair		
Family/Friends		

If you answered No, please detail the issue(s) below

--

4. **What type of childcare do you use for your school age children?** Please select all that apply

Breakfast club	
After school club/activities	
Holiday club	
Childminder	

Nanny/Au pair	
Family/Friends	
None	

5. Are you satisfied with the childcare received from all your school age providers?

	Yes	No
Breakfast club		
After school club/activities		
Holiday club		
Childminder		
Nanny/Au pair		
Family/Friends		

If you answered No, please detail the issue(s) below

--

6. If you use childcare, please say why. Please select all that apply.

So that I can work	
So that I can look for work	
So that I can study/train	
So that I can fulfil other caring responsibilities	
So that I can go shopping/attend appointments/socialise	
For my child's benefit e.g. educational/social/enjoyment	
Other, please specify	

7. Did you use Family Space Croydon when searching for childcare? YES / NO

8. Are there any barriers to you using childcare? Please select all that apply.

Too expensive	
Cannot find an available place	
Sessions are not available at the times I want	
I am not happy with the quality available	
Transport difficulties getting to a provider	
Children don't want to go	
Provider unable to meet child's SEN needs (if any)	
I do not need childcare	
Other, please specify	

9. Are you aware of the following funded childcare options?

	Yes	No	Already using
15 hours of funded childcare per week for some 2 year olds			
15 hours of funded childcare per week for all 3 and 4 year olds (universal funding)			
30 hours of funded childcare per week for some 3 and 4 year olds (extended funding)			

If you would like to [find out more](http://www.childcarechoices.gov.uk) about free childcare entitlements and eligibility, please visit www.childcarechoices.gov.uk

Appendix 3
Thank you for your time.

Appendix 4 Maintenance Programme		
School	Works Description	Budget 2020/21
GENERAL BUILDING WORKS		
Purley Oaks Primary	Replace circa 40no. external windows subject to survey	£82,500.00
Selsdon Primary	Survey and replace leaking roof over kitchen	£75,000.00
Gresham Primary	Replace 55sqm of external timber windows	£50,000.00
Tunstall Nursery	Underpinning works	£110,000.00
Purley Nursery	Roof replacement works	£100,000.00
Red Gates Primary School	Roof Replacement Works - Subject to Survey	£10,000
Park Hill Infants	Replacement of High Level Windows around main hall	£75,000.00
ELECTRICAL WORKS		
Greenvale Primary	Replace existing luminaries; replace all final circuit wiring and sockets throughout the main building	£120,000.00
Forestdale Primary	Replace 20 year+ luminaries	£70,000.00
Winterbourne Junior Girls	Replace 25 year+ luminaries	£130,000.00
Winterbourne Infant & Nursery	Replace 25 year+ luminaries	£120,000.00
Downsview Primary	Replace all final distribution boards and panel. General replacement/maintenance of MCCB switches	£50,000.00
Crosfield Nursery	Replace existing luminaries	£15,000.00
Heavers Farm Primary	Replace 20 year+ luminaries	£80,000.00
HEATING & MECHANICAL WORKS		
Gresham Primary	Replacement radiator and pipework	£165,000.00
Greenvale Primary	Replacement boilers, pipework and radiators subject to survey	£450,000.00
Forestdale Primary	Replace Hot Water Storage & Pipework Distribution (old building)	£180,000.00
Purley Nursery	Replace hot water storage cylinder	£15,000.00
The Hayes	Replacement radiators and boilers subject to survey (2year programme 2019/20 and 2020/21)	£250,000.00
Purley Oaks	Boiler Replacement subject to Survey	£300,000.00
Woodcote Primary	Replace Hot Water Cylinder and survey remaining boiler room to undertake potential works in 2021/22	£20,000.00
OTHER		
Asbestos Re-inspection Surveys	Annual re-inspection Surveys/remedial works in schools	£40,000.00
Historical defects	Manage repair works in schools after defect period	£150,000.00
Re-active Maintenance	Undertake emergency works in schools throughout the year	£224,500.00
TOTAL		£2,882,000.00

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1. Introduction

1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

2. Proposed change

Directorate	Children, Families and Education
Title of proposed change	Education Estates Strategy / School Admission Arrangements
Name of Officer carrying out Equality Analysis	Alison Farmer

2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

Briefly summarise the proposed change and why it is being considered. Please also state if it is an amendment to an existing arrangement or a new proposal.

The proposed Education Estates Strategy will ensure that the Council is compliant with its statutory requirements relating to school place sufficiency duties across three stages of education: early years, primary, and secondary and in relation to special school provision. The Strategy includes:

School Place Planning - Early Years; Alternative Provision / Pupil Referral Unit (PRU); Special Educational Needs and Disability (SEND);

School Admissions - proposed Admission Arrangements for Croydon's community schools for the 2021/22 academic year and adoption of the proposed Pan London co-ordination arrangements;

School Maintenance and Compliance - proposed Schools' Maintenance Plan for 2020/21 including asbestos management; and fire safety works in Croydon community schools.

All of the proposed changes are amendments to existing arrangements.

The Strategy is submitted/approved by Cabinet, and full Council in relation to Admission Arrangements on an annual basis. An update report is submitted to Cabinet in July.

School Place Planning

In accordance with the Education and Inspections Act 2006, the Council has a statutory duty to "secure that sufficient schools for providing— (a) primary education, and (b) [secondary] education are available for their area" as well as to "secure diversity and increase opportunities for parental choice when planning the provision of school places" in the borough. The strategy aims to ensure that there are sufficient and suitable school places available for all of Croydon's children; admission arrangements and policies are fair and lawful; the education estate is maintained to a good standard and comply with our duties under equalities and health and safety legislation and compliance with statutory safety legislation and mandatory fire safety requirements.

Early Years

Local authorities are required by legislation - Childcare Act 2006 and Children and Families Act 2014 - to secure early education places for three and four year olds, as well as disadvantaged two year olds Early Years, until the child reaches compulsory school age. Croydon has a wide range of provision offering funded places ranging from day nursery, preschool; schools with nursery places and funded childminders. Cabinet has been asked to note the information contained in the Education Estates Strategy report. There are no proposed changes.

Alternative Provision / Pupil Referral Unit (PRU)

Under Section 19 of the Education Act 1996 Local Authorities have a statutory duty to arrange suitable education for permanently excluded pupils, and for pupils who – because of illness or other reasons – would not receive suitable education without such provision. Education outside of school, when it is arranged by Local Authorities or schools is called alternative provision. There are no immediate proposed changes. .

Special Educational Needs and Disability (SEND)

Nationally and in Croydon, about 97% of children are educated in the state-funded school system without the need for help or support beyond that which a mainstream school can provide. Of these children between 11-12% need some additional support at some stage to address a learning need for varying

periods of time. The Council as an education authority has specific duties in relation to provision of education for children with special educational needs (SEN). The main duties include: to identify whether a child for whom they are responsible has SEN; and to assess a child who in their opinion has SEN. If the assessment shows that it is necessary, to make an EHC Plan: determining the child's needs and the educational provision required and to ensure the specific provision set out in the Plan is provided. The proposed strategy / changes, include change of provider of Rainbow nursery from September 20120 with a related consultation on the extension of the age range for St Giles School. This change will contribute to improved care, and early years educational outcomes and life chances for all children with Special Educational Needs and/or Disabilities. Consultation will be undertaken on a proposal to extend the age range of St Giles Special School to provide specialist education for children with learning difficulties from 3 - 4 years old, to enable Croydon's offer of early education to be provided effectively for all children.

The Council is undertaking feasibility studies and suitability/quality survey of a number of special schools (Red Gates; Priory and St Giles Schools) to inform options for the development of the Education Estate, specifically to ensure equality of opportunity to access good or outstanding special education provision in the Borough for children and young people with a wide range of special educational needs and disabilities.

School Admissions

In line with the Schools Admission Code, 2014, Admission Authorities, including Local Authorities are responsible for ensuring that admission arrangements are compliant with the School Admissions Code. This includes consulting on proposed changes to admission arrangements annually and at least every 7 years where there have been no changes.

School Maintenance

The Council is the employer for community schools, community special schools, maintained nursery schools and pupil referral units and is responsible for larger condition and maintenance works. It has a duty to ensure that appropriate arrangements are in place to monitor and review any preventative and protective measures that have been implemented. The programme of works / maintenance plan will ensure that schools are properly maintained and remain open and supports educational performance and the health & safety of pupils, staff and school community.

3. Impact of the proposed change

Important Note: It is necessary to determine how each of the protected groups could be impacted by the proposed change. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

3.1 Additional information needed to determine impact of proposed change

Table 1 – Additional information needed to determine impact of proposed change

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table.

Additional information needed	Information source	Date for completion
Croydon has a diverse range of educational provision, as outlined below:		
Consultation on the proposed change to extend the age range at St Giles Special School will be undertaken in 2020 and findings reported in the July 2020 Education Estates Strategy Cabinet Paper. The Croydon Observatory contains further information around this for example population trends, ward profiles, population groups etc. http://www.croydonobservatory.org/		

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

3.2 Deciding whether the potential impact is positive or negative

Table 2 – Positive/Negative impact

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.
The primary aim of the Education Estates Strategy is to ensure that as an education authority the Council fulfils its statutory duties relating to school place planning, school admission and school maintenance. Local authorities are required to meet their statutory duty by providing a school place for every child that requires one, regardless of race, ethnicity, gender or disability and the other protected characteristics. Admission arrangements for all Croydon community schools must be determined annually. All schools are required by law to have oversubscription criteria for admissions, which are used to determine the offer of places if a school receives more applications than there are places available. The criteria must be clear, fair and objective in line with the School Admission Code, Equality Act and other relevant legislations, promoting equality and inclusiveness for residents.

One of the key aims of the Education Estates Strategy is to improve diversity and choice of schools, the right amount of and different types of schools to improve parental choice. This will help to ensure that all pupils have equitable access to school and ensure that the Council's duty to provide sufficient school places for pupils of statutory school age is fulfilled.

The Council is the employer for community schools, community special schools, maintained nursery schools and pupil referral units and is responsible for larger condition and maintenance works ensuring that school buildings meet minimum standards.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	In line with the School Admissions Code, school places are allocated using the agreed/published admissions criteria. The proposed changes relate to children and young people of statutory school age. Admissions to schools are a function that operates within a statutory framework. Croydon is the admission authority for community schools and there are arrangements and criteria for the admission of pupils to nursery, primary and secondary mainstream schools.		
Disability	Children and young people with special educational needs and/or disability are given priority in the admissions criteria or attend special schools. All schools are required to admit a child if their Education and Health Care Plan names the school. The proposed extension of the age range for St Giles School is a re-provision of specialist nursery places at a mainstream nursery school. <u>Equality & Diversity Monitoring</u> As part of the consultation process on the proposed change relating to the extension of the age range at St Giles Special School, respondents will be asked to complete an equality and diversity questionnaire, looking at Gender, Age, Ethnicity and Disability. The		

	information collected will help to identify any special requirements; promote equality; and improve choice and diversity.		
Gender	As above, children allocated school place in line with Admissions Code. The proposed changes are not gender specific. The admission arrangements do not contain criteria that impact differently on people with a particular gender.		
Gender Reassignment	As above.		
Marriage or Civil Partnership	N/A		
Religion or belief	The admission arrangements for voluntary aided school could contain a denominational criterion within the policy, to enable priority for children whose parents are active members of the C of E and who request admission to a church school on denominational grounds. However, all applications, including those with no faith basis for applying, are considered applying the published arrangements.	The admission criteria is based on determined admission arrangements compliant with the relevant legislation and is unlikely to discriminate unlawfully.	
Race	The Admission Criteria, based on the Admissions Code, are used to allocate school places and do not include ethnicity or race as criteria. The proposed changes are not intended to have any negative impact on pupils from different ethnic groups		
Sexual Orientation	As above		
Pregnancy or Maternity	As above.		

Important note: You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics.

3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact)
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

Severity of Impact	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	Likelihood of Impact			

Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

Table 5 – Impact scores

Column 1	Column 2	Column 3	Column 4
PROTECTED GROUP	<p>LIKELIHOOD OF IMPACT SCORE</p> <p>Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>SEVERITY OF IMPACT SCORE</p> <p>Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>EQUALITY IMPACT SCORE</p> <p>Calculate the equality impact score for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group.</p> <p>Equality impact score = likelihood of impact score x severity of impact score.</p>
Age	1	1	1
Disability	1	1	1
Gender	1	1	1
Gender reassignment	1	1	1
Marriage / Civil Partnership	1	1	1
Race	1	1	1
Religion or belief	1	1	1
Sexual Orientation	1	1	1
Pregnancy or Maternity	1	1	1

4. Statutory duties

4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups ☐ x

Eliminating unlawful discrimination, harassment and victimisation ☐ x

Fostering good relations between people who belong to protected characteristic groups ☐ x

Important note: If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

5. Action Plan to mitigate negative impacts of proposed change

Table 5 – Action Plan to mitigate negative impacts

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	N/A			
Race	N/A			
Sex (gender)	N/A			
Gender reassignment	N/A			
Sexual orientation	N/A			
Age	N/A			
Religion or belief	N/A			
Pregnancy or maternity	N/A			
Marriage/civil partnership	N/A			

6. Decision on the proposed change

Equality Analysis

Based on the information outlined in this Equality Analysis enter X in column 3 (Conclusion) alongside the relevant statement to show your conclusion.		
Decision	Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.	X
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form	
Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: Date:

7. Sign-Off

Officers that must approve this decision	
Equality lead	<div>Name:Date:</div> <div>Position:</div>
Director	<div>Name:Date:</div> <div>Position: Interim Director of Education</div>

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REPORT TO:	CABINET 20 January 2020
SUBJECT:	Equality Framework for Local Government Accreditation
LEAD OFFICER:	Jo Negrini, Chief Executive Gavin Handford, Director Policy and Partnerships
CABINET MEMBER:	Councillor Hamida Ali, Cabinet Member for Safer Croydon & Communities
WARDS:	All

CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON

The Equality Framework for Local Government is a process that enabled the Council to better understand the importance of equality, and evidence that its policies, processes and leadership are developing better equality and inclusion outcomes.

The process enabled the Council to learn more about the organisation, our partners and our local communities. By drawing together equalities best practice from across the organisation and seeking and listening to our staff and partners, we will be able to learn from one another and understand how we can improve practices and relationships.

The framework also encourages a focus on local issues and prompts learning from, and the spreading of, good practice in regards to matters of equality and inclusion.

This will help the Council address a number of its Corporate Plan priorities as listed below:

- Abolish inequality in Croydon and work towards a place where all have an equal opportunity to prosper.
- Croydon becomes a more equal place
- Create a collaborative, inclusive and creative environment that allows talent to flourish, building capacity to meet our ambitions

FINANCIAL IMPACT

There are no additional costs, savings or efficiencies associated with this report.

FORWARD PLAN KEY DECISION REFERENCE NO.: Not a key decision

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

The Cabinet is recommended to:

- 1.1 Note the successful outcome, following the Local Government Association Equality Framework for Local Government peer assessment, and the Council's accreditation as Achieving.

2. EXECUTIVE SUMMARY

2.1 The purpose of the report is to provide:

- information about the Council's Equality Framework for Local Government (EFLG) Accreditation;
- update on initial feedback and conclusions received from the Peer challenge team;
- information on actions the Council will undertake to address LGA recommendations.

3. Background and Context

3.1 The Council is fully committed to equality, diversity and inclusion. We have set out our ambition for growth that benefits all in the borough, and improving equality of, and access to, opportunity.

3.2 The Council therefore proactively sought to undertake the Equality Framework for Local Government (EFLG) Accreditation. The EFLG is managed and delivered by the Local Government Association (LGA).

3.3 The EFLG Accreditation is a tool that helps organisations, in discussion with local partners including local people, review and improve their performance for people with characteristics protected by the Equality Act 2010.

3.4 By using the EFLG, organisations can also be helped to deliver on the public sector equality duty (PSED).

3.5 Gaining an LGA equality accreditation will help the Council demonstrate to its service users and the wider community that equality is at the heart of everything we do, the services we deliver and quality standards are in place on matters of equality and inclusion.

3.6 The Framework covers five main performance areas, each of which is subdivided into a number of elements. The five main areas are listed below:

- Knowing your communities
- Leadership, partnership and organisational commitment
- Involving Your communities
- Responsive services and customer care
- A skilled and committed workforce

4. The EFLG Peer Challenge

4.1 The EFLG accreditation is undertaken through a peer challenge process, coordinated by the LGA.

4.2 The Council prepared for a peer challenge at the Achieving level of the EFLG. This level focuses on implementing systems, policies and procedures.

4.3 The Council assessed its performance against the EFLG by undertaking a self-assessment. The self-assessment template set out how the organisation is performing against each of the criteria in the framework.

4.4 In addition to the self-assessment, the following information was submitted in support of EFLG:

- a narrative report clearly setting out how the organisation has met the requirements of the EFLG at the “achieving” level under the 5 main headings of the Framework;
- 23 brief case studies demonstrating significant equality outcomes within Council services. Case studies also included work with partners and within the community;
- supporting documentary evidence.

4.5 The onsite challenge took place from 5th – 7th November 2019. The peer team was made up of the following individuals:

Akua Agyepong – Kent County Council
John Cowings – Derbyshire County Council
Gill Elliott – Local Government Association
Sam Johnson – BCP Council
Cllr Brigid Jones – Birmingham City Council
Laura Wilson – Local Government Association

4.6 The peer team undertook 26 interviews, group meetings and visits with councillors (including opposition and back bench councillors), officers (senior and front line), stakeholders and partners. These sessions ensured that the peer team received feedback across all areas of the assessment, and a range of services and activities

4.7 The peer team also undertook 5 community visits. This included Community Connect Foodstop, voluntary and community groups and Thornton Heath library.

4.8 The purpose of the sessions was to test the claims made by the Council in our submission and self-assessment.

5. Outcome of the EFLG Accreditation

5.1 The London Borough of Croydon has satisfied the criteria for the Achieving level of the EFLG.

5.2 The EFLG process is an improvement tool. The peer challenge team therefore identified strengths and areas for consideration against each of the EFLG criteria. These are summarised below.

Knowing Your Communities

<u>Strengths</u>	<u>Areas for consideration</u>
<ul style="list-style-type: none"> • wealth of data is gathered from a wide range of sources including health and other partners • shift towards localities helps tailor services to communities • evidence based response to issues e.g. Violence Reduction Partnership; Vulnerable Adolescents Review 	<ul style="list-style-type: none"> • different levels of data collection/use depending on the service • ensure all staff have the skills and confidence to collect protected characteristic data and understand the importance of that • ensure there is a good understanding of the diversity of BAME communities fully e.g. Eastern European communities

Leadership, Partnership and Organisational Commitment

<u>Strengths</u>	<u>Areas for consideration</u>
<ul style="list-style-type: none"> • strong commitment to equality from political and organisational leaders • strong partnerships with statutory partners and the VCS • organisations representing voluntary sector partners feel able to influence LBC strategies and plans via the Local Strategic Partnership 	<ul style="list-style-type: none"> • consider establishing a service level steering group to ensure services have equality at the forefront of their work • increase opportunities for the scrutiny function to pay due regard to equality, diversity and inclusion • quality use and outcomes of EAs need improving, with outcomes being implemented and monitored. Heads of service and executive directors being held accountable for the final outcome

Involving Your Communities

<u>Strengths</u>	<u>Areas for consideration</u>
<ul style="list-style-type: none"> • there are many opportunities for young people to be involved in improving and developing Children's Services e.g. Young director Apprenticeship, Forum for SEN, Youth Offending Forum, Total Respect training, youth mayor, care leavers forum • the Get Involved consultation platform enables residents to influence policy making via an app, PC, tablet • Community Ward budgets are a useful tool for members to get involved local residents a say in how the money is spent in their areas. 	<ul style="list-style-type: none"> • consult with the broadest possible range of people • continue to develop the new approach to communications to improve access to services • ensure communities are informed of the outcomes of consultations

Responsive Services and Customer Care

<u>Strengths</u>	<u>Areas for consideration</u>
<ul style="list-style-type: none"> the Gateway approach enables a focus on holistic needs of people users and reducing the barriers between services the Localities approach is already working in three areas where there is the most need. Children and youth Services will be area based service delivery plans have to include a focus on equality and diversity and they are monitored 	<ul style="list-style-type: none"> plans to improve service delivery in Access Croydon; these need to be implemented digital offer needs to be more responsive to staff and customer needs maximising opportunities for social value when commissioning

A skilled and Committed Workforce

<u>Strengths</u>	<u>Areas for consideration</u>
<ul style="list-style-type: none"> staff are proud to work for Croydon “proud to serve” staff networks are robust, well supported and really making a difference to equality in the organisation there are learning and development opportunities for staff e.g. mental health first aid, unconscious bias training 	<ul style="list-style-type: none"> the organisation needs to improve its level of disclosure against the equality monitoring data by demonstrating it won't disadvantage people BAME and disabled employees are disproportionately involved in disciplinary and grievances review the presentation of workforce data to easily identify needed actions

5.3 The peer challenge team will provide further detail in a report. This is not available at this time but will be report to Cabinet alongside the Equalities Annual report.

6. Actions to address recommendations

- 6.1 The Council will be developing responses to each of the recommendations made by the EFLG peer team, once the peer team report is received. It is proposed that this be reported to the Cabinet in March and be used to inform new equality objectives for consultation.
- 6.2 Many of the areas for consideration, identified by the peer team, were already known by the Council. In many cases work is underway / planned, and confirmation from the peer team of these areas of focus is very helpful.
- 6.3 Governance that will oversee delivery against the EFLG recommendations will include bi-monthly updates to the organisations Culture Board that will provide support for delivery, and feedback on any issues or blockages, bi-monthly updates to the Members Equality and Diversity Group, regular progress reports to the organisations Executive Leadership Team (ELT) and regular updates to

the organisations Corporate Leadership Team (CLT) focusing on the actions that are needed.

- 6.4 Consultation will be undertaken between April and August to inform a new Equalities and Inclusion Strategy. It is proposed that this will be reported to Cabinet in September.

7. CONSULTATION

- 7.1 The information included in the self-assessment, case studies and supporting documentary evidence was drawn from a range of sources from across the Council.
- 7.2 The process has also involved identifying activities that demonstrate good practice on equality and working with activity leads to gather more detailed information on how these initiatives have delivered positive outcomes for local people, particularly those that are most vulnerable and may experience exclusion.

8 PRE-DECISION SCRUTINY

- 8.1 This report is for information, and therefore was not reported to Scrutiny & Overview Committee in advance.

9 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 9.1 There are no direct financial implications arising from this report.
- 9.2 The Equality Framework for Local Government report will be published in an electronic format and will not incur a publication cost to the Council.

The effect of the decision and risks

- 9.3 This report is for information and will therefore have no effect on the current policies or budget of the council. Action has been delivered in accordance with the risk management process.

Future savings/efficiencies

- 9.4 There are no savings or efficiencies associated with the approval of this report.

Approved by: Lisa Taylor, Director of Finance Investment and Risk, Finance Investment and Risk

10. LEGAL CONSIDERATIONS

- 10.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that there are no direct legal considerations arising from the recommendations in this report.

Approved by Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer

11. HUMAN RESOURCES IMPACT

- 11.1 Equality is integral to our workforce processes, policies and practices, including becoming an employer of choice. We continue to make positive progress towards having a workforce that reflects its community and where inclusivity is embedded in our practice, though it is recognised that there is more to do.

Approved by Sue Moorman, Director of Human Resources

12. EQUALITIES IMPACT

- 12.1 The Council has a statutory duty to comply with the provisions set out in the Equality Act 2010. It must exercise of all its functions, “have due regard to” the need to the need to comply with the three arms or aims of the general equality duty.
- 12.2 This report will not have any disproportionate impact on people sharing one or more protected characteristics.
- 12.3 The Equality Framework for Local Government Accreditation will help the Council to deliver on the public sector equality duty (PSED). The process will help the council in review and improve its performance for people with characteristics protected by the Equality Act 2010.
- 12.4 The EFLG process will help the Council to identify what we do well and where we can make improvements to and deliver better equality outcomes for staff, residents and service users. This will also help the Council meet its Corporate Plan priority to abolish inequality.

Approved by Yvonne Okiyo, Equalities Manager

13. ENVIRONMENTAL IMPACT

- 13.1 There are no environmental issues arising out of this report.

14. CRIME AND DISORDER REDUCTION IMPACT

- 14.1 There are no crime and disorder issues arising from this report

15. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 15.1 To support the Council to demonstrate its transparency and fairness in its operations as well as compliance with its public sector equality general duty and specific duties as defined by the Equality Act 2010.

16. OPTIONS CONSIDERED AND REJECTED

- 16.1 This report is for information. Further reports are proposed to provide further detail and develop strategy and objectives for approval.

17. DATA PROTECTION IMPLICATIONS

- 17.1 This report does not involve processing of 'Personal' Data'. Therefore no data protection impact assessment (DPIA) has been completed.

Approved by: Gavin Handford, Director of Policy & Partnership

CONTACT OFFICER: Yvonne Okiyo, Equalities Manager Ext. 63265

APPENDICES: Appendix 1 – Croydon EFLG Presentation [Initial LGA Feedback]

BACKGROUND DOCUMENTS: None

Equality Peer Challenge – London Borough of Croydon

Peers

Sam Johnson – BCP Council

Akua Agyepong – Kent County Council

John Cowings – Derbyshire County Council

Cllr Brigid Jones – Birmingham City Council

Gill Elliott – Local Government Association

Laura Wilson – Local Government Association

The Challenge

- Designed to consider the Council's self assessment at the Achieving level of the Equality Framework for Local Government
- Not an inspection but an external assessment by critical friends

5 Themes of the Framework

- knowing your communities
- leadership, partnership and organisational commitment
- involving your communities
- responsive services and customer care
- skilled and committed workforce

knowing your communities

strengths:

- A wealth of data is gathered from a wide range of sources including health and other partners
- There are shared data sets across key partners e.g Job Centre Plus and Croydon Working
- Shift towards localities helps tailor services to communities
- Data and intelligence is being used to determine priorities and these differ depending on locality
- Evidence based response to issues e.g Violence Reduction Partnership; Vulnerable Adolescents Review
- The Council understands the diversity of the BAME community – e.g. use of food shops not food banks
- Some service managers know how to use data to make links and opportunities between services
- There are opportunities for managers to learn about use of data

knowing your communities

areas for consideration:

- Some of LBC's data is inconsistent e.g Number of people with learning disability in the borough ; no of unaccompanied asylum seeker children
- Different levels of data collection/use depending on the service
- Data storage is adhoc and not all in one place or easily accessible by services
- Earlier engagement with communities on equality impact assessments
- Ensure any new systems capture all the characteristic data of service users/the community
- Ensure all staff have the skills and confidence to collect protected characteristic data and understand the importance of that
- Ensure there is a good understanding of the diversity of BAME communities fully e.g. Eastern European communities
- Disaggregate the data presented on BAME communities

Leadership Partnership and organisational commitment

Strengths

- There is strong commitment to equality from political and organisational leaders
- There is a visually diverse leadership team
- Clear link on E&D from manifesto to corporate plan and cabinet. This is monitored at the members equalities group
- Strong drive on early intervention and prevention via the Localities model
- Strong partnerships with statutory partners and the VCS
- Procurement and commissioning is used to deliver equality outcomes. Insight team is closely located with their service departments.
- Recognition that celebrating diversity boosts the local economy
- Organisations representing voluntary sector partners feel able to influence LBC strategies and plans via the Local Strategic Partnership

leadership, partnership and organisational commitment

areas for consideration

- Consider establishing a service level steering group to ensure services have equality at the forefront of their work
- Consider reviewing the level of resourcing for the corporate equality function
- Increase opportunities for the scrutiny function to pay due regard to equality, diversity and inclusion
- Ensure all representatives of LBC role model its values and behaviours and support members to do so
- Quality use and outcomes of EIAs need improving, with outcomes being implemented and monitored. Heads of service and executive directors being held accountable for the final outcome.
- Voluntary sector organisations feel adversely affected by the high turnover of commissioning/contact management staff

Involving your communities

strengths:

- There are good examples of external engagement in developing strategies
- All consultations have equality impact assessments
- The Asset Based Community Development approach is welcomed by some in the voluntary sector as a way of empowering people
- There are many opportunities for young people to be involved in improving and developing Children's Services e.g Young director Apprenticeship, Forum for SEN, Youth Offending Forum, Total Respect training, youth mayor, care leavers forum
- The Get Involved consultation platform enables residents to influence policy making via an app, PC, tablet
- Community Ward budgets are a useful tool for members to get involved local residents a say in how the money is spent in their areas.

Involving your communities

areas for consideration:

- Further develop links with smaller communities to help inform understanding of their needs in relation to services
- Ensure communities are informed of the outcomes of consultations
- Consider developing a criteria for the distribution of community budgets
- Consult with the broadest possible range of people
- Use equality analysis to help identify potential consultees
- Improve/maximise communication channels
- Continue to develop the new approach to communications to improve access to services

responsive services and customer care

strengths:

- The CVS supports the delivery of services which meet diverse needs e.g. the dominoes club, domestic violence groups for Asian women, knife crime workshops
- The Gateway approach enables a focus on holistic needs of people users and reducing the barriers between services
- The Localities approach is already working in three areas where there is the most need. Children and youth Services will be area based
- The Family Centre is praised by service users for its “can do – solution focussed” approach
- Data is being used to improve services e.g school admissions
- Service delivery plans have to include a focus on equality and diversity and they are monitored

Responsive Services

Strengths

- Strong emphasis on developing staff to be able to meet customer needs e.g Family Centre Staff will be training the Gateway Team at Access Croydon “XX is the face and I am the voice”
- Young people are involved in developing services and commissioning suppliers

responsive services and customer care

areas for consideration:

- There are plans to improve service delivery in Access Croydon; these need to be implemented
- Explore whether services are adequately resourced to meet equality needs in the contact centre
- Ensure that services are responsive to the needs of the whole borough and that the area based approach doesn't create new inequalities
- The opening hours of the Contact Centre may not be responsive to customer needs
- The digital offer needs to be more responsive to staff and customer needs
- Maximising opportunities for social value when commissioning

Skilled and committed workforce

strengths:

- Staff are proud to work for Croydon “proud to serve”
- Executive team are visually diverse
- There are learning and development opportunities for staff e.g. mental health first aid, unconscious bias training
- Some staff feel supported by their managers
- The investment in gathering data and opinions from staff is being used to develop a new workforce strategy
- Council has a baseline of data to measure improvements
- Targeted leadership development for BAME and women has already started to see results
- The organisation uses some positive recruitment practices
- Staff networks are robust, well supported and really making a difference to equality in the organisation

Skilled and committed workforce

strengths:

- The organisation goes beyond the gender pay gap requirements, also measuring disability and ethnicity pay gaps
- The organisation has been responsive to the previous staff survey e.g. using an external provider to reassure staff of anonymity
- There are some examples of innovative practice e.g the Menopause Guidance which has had positive outcomes
- There are good industrial relationships with the Trade Unions

Skilled and committed workforce

areas for consideration:

- Black men do not appear to be progressing at the same rate as their female counterparts
- Ensure all staff are aware of the council's equality objectives
- The organisation needs to improve its level of disclosure against the equality monitoring data by demonstrating it won't disadvantage people
- Review the presentation of workforce data to easily identify needed actions
- Capitalise on the intersectional work of the networks to ensure the outcomes of people are improved
- BAME and disabled employees are disproportionately involved in disciplinary and grievances
- Consider introducing a formal scheme for staff with language ability to provide interpretation
- There are opportunities to harness the resources of the trade unions to positively contribute to the equalities agenda
- Involve trade unions in developing the council's work on equality and diversity

Overall Conclusion

**The London Borough of Croydon
has satisfied the criteria for the
Achieving level of the EFLG**

Next Steps

- Report to follow in 3-4 weeks

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REPORT TO:	CABINET 20 JANUARY 2020
SUBJECT:	Health and Social Care Integration and South West London
LEAD OFFICER:	Guy Van Dichele, Executive Director of Health, Wellbeing and Adults Rachel Soni, Director of Integration & Innovation
CABINET MEMBER:	Councillor Jane Avis, Cabinet Member for Families, Health & Social Care
WARDS:	All
CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON <i>This report provides an overview of the current status of health and social care integration and the relationship of Croydon as our place and with South West London as our sub-region. The integration of health and social care addresses Outcome 1 of the Corporate Plan: supporting People to live long, happy, healthy and independent lives. The One Croydon Health and Care Plan published in the summer of 2019 delivers the eight Health and Wellbeing Strategy Priorities.</i>	

FINANCIAL IMPACT

There are no direct financial implications of this report. However, any costs associated with recommendations taken forward will be absorbed within approved resources or additional investment sought.

FORWARD PLAN KEY DECISION REFERENCE NO.: N/A

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

The Cabinet is recommended to

- 1.1 Note the current status and progress in relation to the integration of health and social care and the developments locally and sub-regionally in South West London as a result of the NHS Long Term Plan.
- 1.2 Note and agree the next steps for One Croydon's journey to health and social care integration.
- 1.3 Agree any actions arising from the equality analysis.

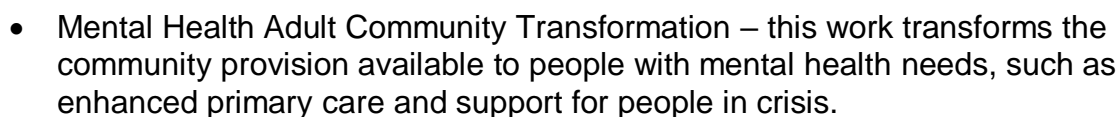
2 EXECUTIVE SUMMARY

- 2.1 The purpose of this report is to update Cabinet on the current status of Health and Social Care integration in Croydon and seek approval for the next steps through the vehicle of the One Croydon Alliance with its six member organisations, Croydon Council, Croydon Clinical Commissioning Group (CCG), Croydon Health Services NHS Trust, South London and Maudsley NHS Trust, Age UK Croydon and Croydon GP Collaborative.
- 2.2 One Croydon has published its five year Health and Care Plan in summer 2019 which will deliver the Health and Wellbeing Board priorities. The NHS Long Term Plan was published in January 2019 setting out how the NHS landscape is required to change with the mergers of Clinical Commissioning Groups and the formation of sub-regional Integrated Care Systems by April 2021. Croydon is part of the South West London sub-regional footprint and the system has applied to NHS England to receive ICS status in the first round in 2020. The Corporate Plan commits to expanding the scope of One Croydon from the over 65s age group to the whole Croydon population and this report sets out the progress and next steps to achieving this, which includes increasing scope process, governance arrangements, contracting structures, alliance partner updates and system planning. Section 9.0 includes detail on the next steps.

3 PROGRESS WITH HEALTH AND SOCIAL CARE INTEGRATION

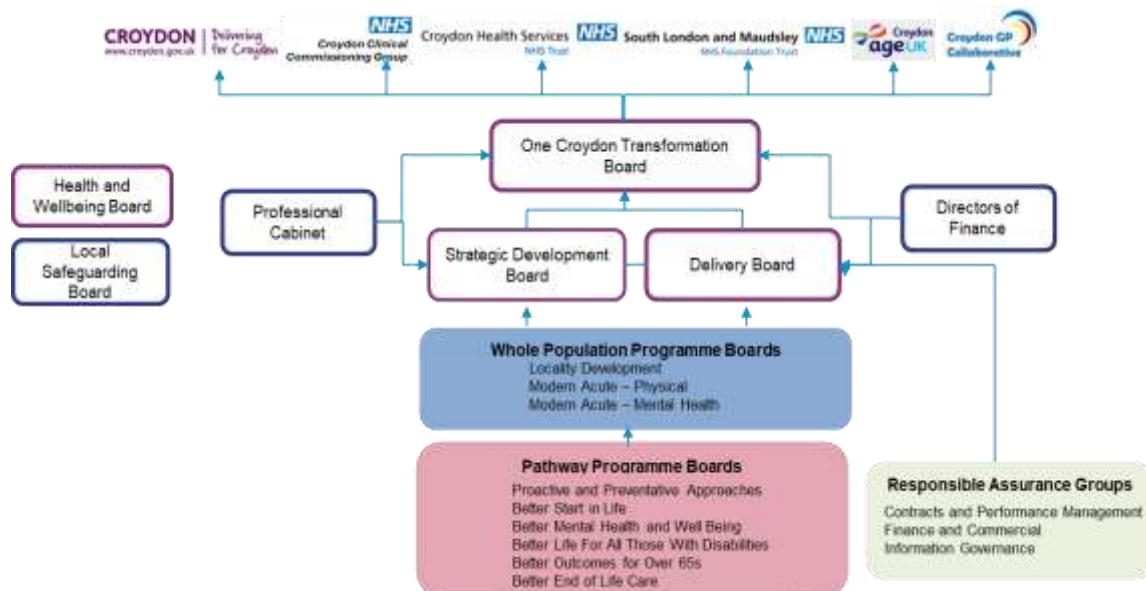
- 3.1 **Service Integration for the over 65s:** The last 12 months has seen progress in embedding the integrated provision arising from the system business case agreed in 2017. The LIFE service and the Integrated Community Network (ICN) service models have been live for two years. There is high demand on these services and there are new customer journey's in place for discharge from hospital, providing reablement and rehabilitation services for people and rapid clinical response services. The multi-disciplinary teams work in a co-ordinated way proactively identifying people with health and social care needs aiming to support them to remain independent. In addition, investment in our local voluntary groups and social prescribing has taken place and a roll out of telemedicine in most of our care homes in Croydon. There is a sustained reduction in emergency admissions to Croydon University Hospital of older people, there is now reduced length of stay for those who were staying the longest in our acute services. There is a cost to social care to prevent admissions and also to maintain independence at home and spend on social care for older people is rising.
- 3.2 **Outcomes:** The original outcomes framework has been populated and an updated whole population framework has been developed and baselined. The One Croydon Alliance is establishing more effective use of this framework and regular monitoring. Further engagement with the wider population including under 65s is required.
- 3.3 **Investment and Further Transformation:** Investment remains at the same level agreed in the system business case in 2017. The Economic Review in November 2018 highlighted gaps in funding of key activity, predominantly in adult social care, which will require addressing in revised or new business

- Integrated Community Networks Plus (whole adult population) – this will further develop integrated working in localities, with a pilot due to commence in Thornton health in early 2020.



4 GOVERNANCE

- 4.1 **Locally - One Croydon:** The current governance of One Croydon is a Chief Officer meeting named Croydon Transformation Board (CTB), with unanimous voting rights for each partner. It is independently chaired which is to be reviewed prior to January 2020. The proposal is to translate the CTB into the new Health and Care Board in April 2020, which will have a key strategic relationship with the Croydon Health and Wellbeing Board, which sits above the structure below.



- 4.2 There are then two senior boards reporting to Croydon Transformation Board managing development and delivery – The Strategic Development Board chaired by the Executive Director of Health Wellbeing and Adults in the Council and the Delivery Board chaired by the Borough Director in South London and Maudsley NHS Trust. These boards are populated with executive directors and directors. The proposal is to merge these boards into one strategic board and define the agenda's accordingly.
- 4.3 There are three Programme Boards currently establishing populated with directors / operations and programme leads to drive the design and delivery of the health and care plan.
- Locality Development
 - Modern Acute (Physical)
 - Modern Acute (Mental Health)
- 4.4 The pink boards in the diagram above represent stakeholder pathway/customer journey groups where specialist design relating to the client groups take place. The proactive and preventative board operates across the whole population and has a role in holding the pathway boards to account for prevention design throughout their programmes (to be merged with the strategic board).
- 4.5 **Croydon Health Services and Clinical Commissioning Group governance:** The two organisations plan to have:

- CHS Trust Board
- SWL CCG Governing Body
- CHS/CCG Committee In Common

4.6 **South West London Governance:** There is a monthly SWL Programme Board with an independent chair. The SWL CCG Governing Body will delegate to the Croydon Health and Care Board. There is a SWL Governance Design Group of which for Croydon, Guy Van Dichele and Mike Bell (Chair of CHS) are members. The role of Health and wellbeing Boards is being considered there.



5 RECENT DEVELOPMENTS

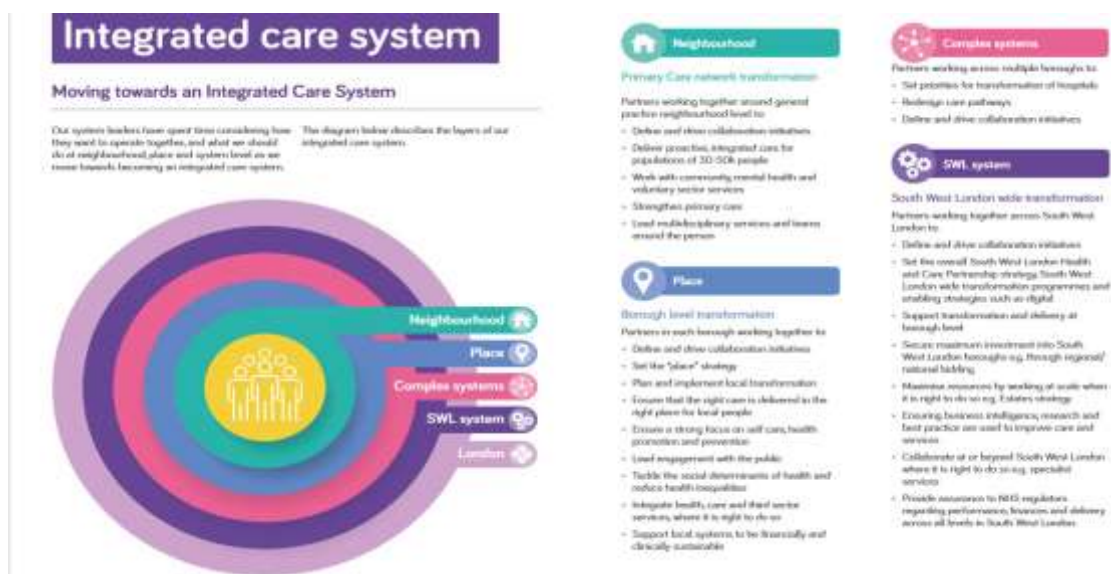
5.1 NHS Structural Changes:

5.1.1 **CCG/CHS Alignment:** Croydon Clinical Commissioning Group and Croydon Health Services have been through a process to align their organisations over the last six months. They have established one senior management team, with Matthew Kershaw appointed and commenced on 1 October as the local Croydon health place based leader. He is also the Chief Executive of CHS. This is the first of this kind nationally. This brings the commissioner and the provider much closer together, although through existing legislation a merger is not legal and must retain separate boards but will manage together through a committee in common. The other key joint appointments are Elaine Clancy – Chief Nurse, Josh Potter – Director of Strategy and Transformation and Mike Sexton – Managing Director and Director of Finance.

5.1.2 **5.1.3 CCG Mergers:** The NHS long term plan requires CCG's to merge across the sub-regional footprints. Local agreement was required and the recent vote to progress this by all six South West London (SWL) areas has now concluded and therefore Croydon CCG will merge with the other five SWL CCG's from April 2020. In the interim Sarah Blow, the existing Accountable Officer for the other five CCG's has taken up the role for Croydon upon the departure of the

previous Croydon CCG Accountable Officer in October. Sarah Blow will then be the permanent Accountable Officer for the Merged CCG from April 2020.

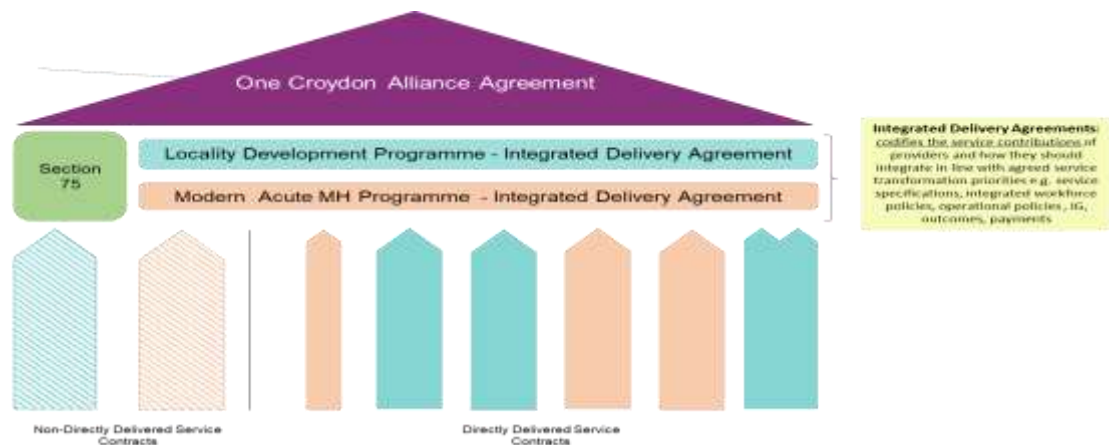
- 5.1.3 **South West London Delegation:** There is planned to be full delegation to place. Croydon is planned to establish a health and care board which will receive delegation of the budget and responsibilities from SWL CCG. It is planned the One Croydon partners will be voting partners on the Health and Care Board.
- 5.1.4 **Integrated Care System (ICS):** The NHS Long term Plan established ICS's on sub-regional footprints. South West London (SWL) will be our ICS and would have about 40 organisations in it as partners. SWL have applied in the first round to NHS England to receive 'ICS Status'. As a system we have completed a maturity assessment with five domains; 1 - System Leadership, Partnerships and Change Capability; Domain 2 - System Architecture and Strong Financial Management and Planning; Domain 3 - Integrated Care Models; Domain 4 - Track Record of Delivery; Domain 5 - Coherent and defined population. For each domain there are four levels of assessment—emerging, developing, maturing, and thriving. SWL submitted an assessment of between developing and maturing to NHS England. The Accountable Officer for the SWL CCG will also be the Chief Officer of the ICS when it comes into form. It should be noted ICSs will not be an entity in the short term. The following diagram shows the system at its different geographical 'levels'.



6 FURTHERING INTEGRATION FOR THE WHOLE POPULATION

- 6.1 The Mental Health Programme Board has been designing the adult community transformation Programme with a key feature being enhanced primary care, improved customer journey's, crisis care that is not in hospital and enhanced stepdown provision, housing availability and housing support. This development work has paused to review the model and investment requirements and is being considered by the joint commissioner across the CCG and Council.

- 6.2 The development of Integrated Children's Services locality working with health, police and the voluntary sector is being explored and progressed. A strategic lead was appointed to work on developing the One Croydon approach for Children's and two workshops have taken place across the system to develop the model of working. The localities programme for early help is advancing as well as plans for a multi-disciplinary Family Safeguarding pilot. The Executive Director of Children, Families and Education joined the One Croydon Transformation Board in November 2019.
- 6.3 The localities development board is now established as one of the core One Croydon governance boards, the Executive Director of Localities in the Council is the joint SRO with the Director of Strategy and Transformation in the CCG. The board is now overseeing the development of whole population locality working across partners, the piloting of Integrated Community Networks+ and the current integrated service provision.
- 6.4 The whole population health and care plan for Croydon was published in September 2019 setting out the vision, finances and expected programme delivery to achieve the eight priorities of the Croydon Health and Wellbeing Strategy and the NHS Long Term Plan.
- 6.5 **Contracting Structure for whole population:** The 10 year Alliance Agreement binds the partners into the relationship, behaviours and ways of working together and sets out the principles and objectives of the partnership. This is working well and there have been no formal disputes or enactment of the voting rights to date. There is an integrated contract arrangement called a SOM that binds the partners who are either commissioning or providing services within the scope of One Croydon in relation to service specification and financial aspects. It is proposed to build on these successful existing arrangements and vary the existing alliance agreement as required and can add or remove necessary partners as we progress the partnership and deepen integration. There is not recommended to be a lead provider model or any sub alliances as this does not fit with current local direction of travel. There will still need to be integrated contracting arrangements, moving the SOM onto an Integrated Delivery Agreement to agree service specifications and finances and there is the aim to move to a single Section 75 arrangement between the statutory bodies. There is commitment from all partners to progress to having some shadow budget arrangements in place for 2020/21. The diagram below demonstrates an option being explored for our future contracting structure as an interim or longer term arrangement.



7 ONE CROYDON PARTNER UPDATES

- 7.1 **GP Collaborative:** The Croydon GP Collaborative is the federation of the 52 GP practices in Croydon. All but two of our GP practices are included members in the collaborative. A new chair is recently appointed as well as a recent appointment of the collaboratives first Chief Executive. The GP collaborative is able to take on contracts across GPs, provide two way communication flow and is very involved in supporting the development of Primary Care Networks, of which nine have now formed in Croydon. Each of those has a clinical director.
- 7.2 **Age UK Croydon and The Voluntary Sector:** Age UK Croydon is the voluntary sector provider member of the Alliance. There is a need to establish fuller voluntary and community sector representation in the Alliance rather than provider presence alone, and the Croydon Transformation Board (CTB) has requested a proposal to be brought to board on how this may operate in future, giving consideration to the council commissioned infrastructure organisations roles and the role of Healthwatch. The Age UK Croydon Chair and Chief Executive are developing this with other members of CTB. Voluntary sector presence and voting rights has been a positive influence to date.
- 7.3 **South London and Maudsley:** The mental health Trust have recently restructured on a borough basis. The Trust works across Lambeth, Lewisham, Southwark and Croydon and previously were arranged in clinical speciality departments. SLaM are also transforming their community mental health services and this is part of the wider adult community transformation.

8 SYSTEM PLANNING

- 8.1 One Croydon partners have committed to planning together. This has taken various forms in addition to the core One Croydon governance boards:
- Development and publication of the whole population One Croydon Health and Care Plan in September 2019
 - Planning together workshops since October 2019 on all priority programmes being delivered across the partners for health and social care for all ages

- Joint Commissioning Intentions for the Council and CCG in Sept 2019
- Workshops on our enablers: IT/Digital, estates and workforce
- Weekly finance planning meetings of the Heads of Finance since October 2019
- Monthly Directors of Finance meetings ongoing for two+ years
- CQOB – monthly cost and quality oversight board for CHS, CCG and Council to share financial indicators, programme delivery and risks for the last 6 months
- Commitment to progressing work for shadow budget (s) for 2020/21
- Commitment to system business cases.

9 NEXT STEPS

9.1 The Croydon Transformation Board has agreed the following next steps for the development of the alliance, which includes expansion of scope to the whole population and contracting mechanisms:

Next Step:	How:	When:
1. Completion of readiness assessment to bring new areas into scope: e.g. mental health and children's transformation.	Readiness assessment has been drafted. One Croydon Governance Boards to consider. Utilise process set out in the Alliance Agreement to increase scope – i.e. by business case as and when ready.	Q4 2019/20 – readiness assessment
2. Agree process for selecting new and future members of the alliance.	As set out in the alliance agreement. Consider wider voluntary sector representation.	Q4 2019/20
3. Agree future contractual format between commissioners and providers – options include Services Operation Manual and Integrated delivery Agreements	Drafting of Integrated Delivery Agreement and agreement to contract providers for their part of integrated service, including budget and funding source.	Q4 2019/20
4. Develop a single Section 75 agreement between statutory bodies for service specifications and finances	Review existing Section 75s and agree future set to be included and agree through governance	Q4 2019/20
5. Establish revised local governance and the governance with South West	Completion of design group at SWL and CTB and to agree new local governance arrangements	Q4 2019/20

London and secure the delegation process		
6. A) Pilot Integrated Community Networks + in Thornton Heath B) Evaluate pilot and take authority to proceed to roll out through One Croydon governance	ICN+ pilot service model drafted. Financial modelling to be agreed and pilot commence. Test aligned budgets and shadow arrangements, including integrated management and new contracting format through the pilot.	Q4 2019/20 Q2 2020/21
7. Develop Alliance integrated workforce strategy	Council Workforce Strategy and NHS People Plan to be utilised as foundation. Strategic Development Board to progress.	Q4 2019/20 and Q1 2020/21

9.2 The above actions will be progressed through the Strategic Development Board and will be reported to Croydon Transformation Board bi-monthly.

9.3 Further engagement design will be developed and delivered to inform, consult and engage the public, service users, patients and their carers in co-production, service design and feedback. The existing monthly over 65s service user reference group is planned to be replicated for other groups and the ICN+ programme has established a Thornton Health public reference group to support the co-design and evaluation of the pilot, engaging Healthwatch to support this.

10 CONSULTATION

10.1 A range of engagement and information and communication has taken place with our residents. There was significant engagement and one larger event for the One Croydon Health and Care Plan on 20th November 2019 which provided a range of input from the public into the plan published in summer 2019. There were 166 attendees at the event. Of the 99 participants who completed the feedback form:

- 97% felt the event was valuable
- 98% felt their contribution was listened to
- 58% felt confident that the priorities will make a positive difference to health and care in Croydon
- 72% felt they know more about the health and care partnership than they did before the event.
- The majority stayed for the entire event, other than the school children.

10.2 The participant make up was as follows:

- Croydon residents - 61
- Staff from partner organisations (CHS, SLaM etc.) – 43
- Stakeholders – 39
- 23 children from Tudor Academy primary school (attended morning only)
- Please see link to the video of the event: <https://youtu.be/q4kvp-TwaNQ>

10.3 There is a monthly over 65 year olds group that has been meeting for over two years and provides invaluable input into the models of care, progress review, testing and critically reviewing communications and materials and design of our pathways and customer journey's.

10.4 Healthwatch have conducted reviews into the current integrated service delivery and fed this back into service design and governance.

10.5 The new Integrated Community Networks + (ICN+) model of care has established a Thornton Health residents reference group, to support the co-design of the ICN+ model and engage and involve people and obtain feedback on needs and current proposals. Healthwatch have been involved in this.

10.6 The localities development work is designed through robust analysis of population data and local need and evidence base for successful models of care.

10.7 The direct payment policy was consulted on during the Summer 2019. The consultation arrangements included two online surveys, one for residents and local organisations and one for staff, that were promoted through the Council's Get Involved website. Fifty five residents, one organisation and three staff responded to the online surveys. In addition to the online survey, workshops and other engagement events were held with staff, partner and residents groups including: The Direct Payments Service User Group; the Learning Disabilities Partnership Board; the BME Forum; a Carers and Carers' organisations workshop; the Dementia Alliance; Croydon Adults Social Services Users Panel (CASSUP); the Autism Partnership Board; Age UK staff workshop, and; Council staff meetings and training events.

10.8 Almost all respondents supported the proposed policy and approach with enthusiasm. The main focus of the responses was much less about the policy itself and more about its implementation. The new policy signed off in September 2019.

11 PRE-DECISION SCRUTINY

11.1 This report has not been to scrutiny. Updates on One Croydon have regularly been to Health and Social Care Scrutiny and is on the forward plan.

12 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 12.1 There are no direct financial implications arising from this report. Any costs associated with recommendations taken forward will need to be absorbed within approved resources or additional investment sought before the recommendations can be implemented. The strategy for the integration of health and social care is to unlock the power of our communities and ensure proactive and preventative approaches to working with our residents. The local and sub-regional system therefore requires appropriate investment plans in primary, community and social care to divert people away from unnecessary acute care and support people to remain independent at home, supported in the community to lead active, healthy and independent lives for as long as possible. There is therefore a current impact on social care spending in that it takes time to release funds from acute provision. It is therefore important that further plans for integration address the balance of investment and that costs are shared appropriately between members of the One Croydon alliance.
- 12.2 There are financial and non financial risks associated with not forming proper and adequate governance for One Croydon health and social care integration, for example robust governance is required to receive delegation from South West London and important to establish local influence in decision making for Croydon at a place level.
- 12.3 **Future savings/efficiencies:** The development of system business cases is required to ensure investment and disinvestment plans are developed, approved and implemented. The nature of the One Croydon programmes requires a shift from acute to primary, community and social care and the relevant investment will be required to ensure a sustainable health and care system for residents to access. The council and system partners have a range of efficiency programmes in place to manage demand, find suitable creative alternatives to acute care and support people in localities in the right place at the right time.

Approved by: *Josephine Lyseight* Head of Finance/nominated deputy

13 LEGAL CONSIDERATIONS

- 13.1 The Director of Law and Governance comments that there are no additional legal considerations arising directly from the recommendations beyond those already set out in the body of this report.

Approved by Sean Murphy, Director of Law and Governance and Deputy Monitoring Officer.

14 HUMAN RESOURCES IMPACT

- 14.1 There is a need to develop the integrated workforce and ensure multi-disciplinary working that wraps support, services and care around the individual. There will be implications for staffing and wider workforce as

integration progresses. The relevant staff engagement and consultation will be completed at each stage of development.

Sue Morman, Director of Human Resources

15 EQUALITIES IMPACT

- 15.1 There is an equality impact assessment for the Health and Care Plan, which was completed and approved in January 2019, and made the following conclusion:

A full equality analysis will not be required. Health inequalities disproportionately affect vulnerable groups as well as groups that share protected characteristics. As such we will need to ensure the high level priority areas of work will help the Borough address wider determinants to prevent and reduce health inequalities and increase life expectancy for all communities. We will also need to ensure work with partners and key stakeholders is inclusive. As such further analysis/equality analysis may need to be undertaken as part of any decision-making processes and detailed action plans developed to achieve each of the priority areas and goals in the health and care plan.

- 15.2 In working towards extending our partnership to the whole population, we will:

- focus on prevention and proactive care – we want to support local people before things become a problem and encourage residents to be more proactive in their own health
- unlock the power of communities by making the most of communities' assets and skills – key to helping local people stay fit and healthy for longer is to connect them with their neighbours and communities
- put services back into the heart of the community - make sure local people have access to integrated services that are tailored to the needs of local communities – locality matters

- 15.3 Our goals over the next ten years are to:

- improve healthy life expectancy
- reduce the life expectancy gap

- 15.4 This will help the council to meet its Equality objective to 'reduce differences in life expectancy between communities'.

- 15.5 The HCP plan therefore focuses on taking action at different levels and addressing all wider determinants to prevent and reduce inequalities. Working in partnership with stakeholders and the community, groups more at-risk of being affected by inequalities have been identified and will be at the centre of all the decision-making processes and action plans developed to achieve the goals of this plan.

Approved by: *Yvonne Okiyo* – Equalities Manager

16 ENVIRONMENTAL IMPACT

16.1 There are no specific environmental impacts arising from this report.

17 CRIME AND DISORDER REDUCTION IMPACT

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

18 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

18.1 The report requests Cabinet to note the progress and agree the next steps for health and social care integration in order to proceed with the delivery of the Health and wellbeing Strategy priorities and Health and Care plan implementation.

19 OPTIONS CONSIDERED AND REJECTED

19.1 Options for the development of One Croydon have been considered:

19.1.1 The creation of Sub Alliances within One Croydon has been discounted for different areas of development, for example Adult Mental Health and Children's transformation. The rationale being to ensure integration and sufficient focus, in that mental health should be integral to all parts of delivery and strategic development for example.

19.1.2 The creation of a lead provider in the One Croydon system was considered and discounted due the need to potentially need to develop new organisational form, TUPE large volumes of staff and does not fit with the current partnership model and direction of travel locally. The funding and charging of health and social care is also very different at this time. Health services are free at the point of delivery and social care is means tested and charged for.

19.1.3 The Health and Wellbeing Board role has been considered and is considered critical as a strategic body that should sit alongside the Health and Care Board.

19.1.4 The move to immediate pooled budgets across the system has been considered and the proposal is to develop and test shadow arrangements during 2020/2021 to ensure this is developed in a considered way and risks appropriately managed.

19.1.5 The maintenance of all the existing boards in the governance structure has been carefully considered and reviewed and the rationale to merge some of the boards is clear to ensure a balance of time to work in partnership and time in meetings is right.

20 DATA PROTECTION IMPLICATIONS

20.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

No.

20.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

No.

Approved by Sean Murphy, Director of Law and Governance and Deputy Monitoring Officer.

CONTACT OFFICER:	Rachel Soni Director of Integration and Innovation
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APPENDICES TO THIS REPORT:	None
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BACKGROUND PAPERS:	None
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REPORT TO:	Cabinet 20 January 2020
SUBJECT:	Community Fund Commissioning Programme
LEAD OFFICER:	Jacqueline Harris Baker Executive Director for Resources
CABINET MEMBER:	Councillor Hamida Ali – Cabinet Member Safer Croydon & Communities Councillor Jane Avis – Cabinet Member Families, Health & Social Care Councillor Simon Hall - Cabinet Member Finance & Resources
WARDS:	All wards
<p>CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON</p> <p>The Corporate Plan acknowledges the important role the voluntary and community sector play in the borough and confirms the commitment to continuing the Community Fund.</p> <p>Following the launch of the Corporate Plan, the Council has engaged with the sector to develop a Voluntary and Community Sector (VCS) Strategy which was agreed by Cabinet in March 2019. The VCS strategy informs the way the Council works with the sector, including the recommissioning of the Community Fund.</p> <p>The Community Fund supports the delivery of the following priorities of the Corporate Plan:</p> <ol style="list-style-type: none"> 1. People live long, healthy, happy and independent lives 2. Preventing, reducing or delaying care and support needs for older people 3. Our young people thrive and reach their full potential 4. Access to homes and prevention of homelessness 5. Everyone feels safer in their street, neighbourhood and home 6. Everybody has the opportunity to work and build a career <p>This report highlights the awards to VCS organisations that will support and deliver on the key priorities from the Corporate Plan and the Council has shown this by increasing funding via the Community Fund for the next three years.</p>	
<p>FINANCIAL IMPACT</p> <p>The Council provides a range of financial support to the Voluntary, Community and Social Enterprise Sector. This equates to in excess of £4m p/a which includes the Community & Prevention Fund, the Community Small Grants Programme, Youth Fund, Green Fund, Local Volunatry Partnership (LVP) Fund rent subsidies and business rate relief. In addition there are substantial further commissioned services that fund the VCS sector by the Council.</p> <p>The budget for the Community Fund and Prevention Fund included is £7,792,929 for three years from 1 April 2020 to 31 March 2023. The projected spend for each year is £2,598,000. This report relates to the recommended awards following the Commissioning Programme of the Community Fund and is recommending awards</p>	

totalling £7,115,530. Allocations for small grants funding for years 21/22 and 22/23 and the emerging needs funding of £100K per annum will be procured/grant funded when required.

This report also notes the delegated decisions by the Cabinet Member for Safer Croydon and Communities for the small grants programme for awards for the total of £233,281 for a period of one year

FORWARD PLAN KEY DECISION REFERENCE NO. REF 5119SCC

This was a Key Decision as defined in the Council's Constitution. The decision was implemented from 1300 hours on the expiry of 5 working days after it was made (10 December 2019) as the decision was not referred to the Scrutiny & Overview Committee by the requisite number of Councillors.

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

- 1.1 The Cabinet is asked to note the below delegated decision made by the Cabinet Member for Safer Croydon & Communities in consultation with the Cabinet Member for Families, Health and Social Care and the Cabinet Member for Finance and Resources for the Community Fund:
 - a. The Cabinet Member for Safer Croydon & Communities in consultation with the Cabinet Member for Families, Health and Social Care and the Cabinet Member for Finance and Resources approved the awards of contracts for the Community Fund to the Organisations listed in this report for a maximum contract period of 3 years (starting 01/04/2020) and for a maximum total contract value across all awards of £7,115,530 as per the 5119SCC dated 18 December 2019.

2. EXECUTIVE SUMMARY

- 2.1 The Council adopted a new Corporate Plan in October 2018. This plan set out the Council's promises to residents, business and partners across nine priority themes over the next four years.
- 2.2 There was a strong commitment to the VCS in the Corporate Plan, recognising the important role it plays in delivering services, support and advice to residents across a wide range of council services.
- 2.3 The Council invests in excess of £4m per annum in financial support to the VCS through the Community Fund, Prevention Fund, the Community Small Grants, Community Ward Budgets, rent subsidies and discretionary rate relief. In addition there are substantial further commissioned services that fund the VCS sector and is also investing further to support the locality working which

is developing across the borough.

- 2.4 The Council has confirmed its commitment to continue funding and has increased the investment over the next three years from April 2020.
- 2.5 This award report is to fund 5 commissioned programmes that were included as part of the original strategy report which include:-
- Advice Services
 - Carers Services
 - Infrastructure Support
 - Contract Management & Quality Assurance of the Prevention Fund
 - Outcomes Approach
- 2.6 This report also provides details, for information, on 19 small grants awards for (under £15K per annum) that the Cabinet Member for Safer Croydon & Communities has approved under their delegation. These awards were made under a separate small grants process and amount to a total value of £233,881 across the 19 awards for the period of one year from 01/04/2020. Details of grant recipients are provided in section 3.37 of this report
- 2.7 38 projects are recommended for award of contracts (separate to the 19 grant awards mentioned in paragraph 2.6). The projects cover the whole of the borough and show an understanding of locality needs and how they will deliver this to improve the lives of residents.
- 2.8 The organisations recommended within this report support the objectives in the VCS Strategy and Corporate Plan by committing to deliver against the following objectives:-
1. People live long, healthy, happy and independent lives
 2. Preventing, reducing or delaying care and support needs for older people
 3. Our children and young people thrive and reach their full potential
 4. Access to homes and prevention of homelessness
 5. Everyone feels safer in their street, neighborhood and home
 6. Everybody has the opportunity to work and build their career
- 2.9 The procurement strategy report was approved at CCB on 24/04/2019 (REF CCB1480/18-19, and at Cabinet on 07/05/2019.
- 2.10 The content of this report has been endorsed by the Contracts and Commissioning Board.

CCB ref. number	CCB Approval Date
CCB1538/19-20	09/12/2019

- 2.11 The Leader has delegated the decision to approve the awards of contracts for the services listed in this report under their powers to the Cabinet Member for Safer Croydon and Communities in consultation with the Cabinet Member for

Families, Health and Social Care and the Cabinet Member for Finance and Resources.

3. DETAIL

Background Information & Procurement Route

- 3.1 The Council carried out five separate tender projects for the projects listed in section 2.5. These were carried out in line with the agreed route within in the procurement strategy. The details of this are included in the table below:-

Tender	Procurement Route	Tender Issue Date	Tender Closing Date
Advice Services	Open Procedure	06/08/2019	08/10/2019
Carers	Open Procedure	26/07/2019	29/09/2019
Infrastructure Support	Competitive procedure with negotiation	25/07/2019	20/09/2019
Contract Management & Quality Assurance of the Prevention Fund	Open Procedure	24/09/2019	27/10/2019
Outcomes Approach	Open Procedure	06/06/2019	01/10/2019

- 3.2 All tenders were advertised via the London Tenders Portal and followed the guidance within the individual tender documentation and the published OJEU notices. The grant awards was a separate process for bids under £15k per annum.
- 3.3 The process followed and the evaluation of each Tender is included in the relevant sections within section 3 of this report.
- 3.4 Tenders were evaluated and awarded on highest score but ensuring there is relevant borough provision and avoiding duplication as detailed within each of the tender documents.

Advice Services

- 3.5 The tender followed the one stage open procedure as detailed within the tender documents and the tender closed on the 8 October 2019.
- 3.6 The Council received one response on time and no late submissions.
- 3.7 The response received from Croydon Citizens Advice Bureau LTD (CCAB) was evaluated in accordance with the tender documentation. The tender was evaluated as follows in three sections:

Mandatory and Discretionary Exclusion

Assessment Criteria	Pass/Fail
Mandatory Grounds for Exclusion	Pass
Grounds for Discretionary Exclusion	Pass
Economic and Financial Standing	Pass
Economic and Financial Standing Discretionary Rejection	Pass
Relevant experience and contract examples	Pass
Modern Slavery Act 2015	Pass
Compliance with Insurance	Pass
Compliance with Business Continuity Requirements	Pass
Compliance with London Living Wage or National Living Wage	Pass

Quality Assessment

Quality Question	Question	Weighting	Score out of 5	Weighted Score
1	Service Outcomes and KPIS	20%	4	16%
2	Engagement	15%	4	12%
3	Service delivery model	15%	4	12%
4	Innovation	10%	3	6%
5	Social Value	10%	3	6%
	TOTAL	70%		52%

Price

The price was assessed as the lowest tender received receiving the highest percentage of 30%. As CCAB was the only organisation that tendered they received the full 30%. The tender price submitted was within the maximum guide price.

- 3.8 The submitted tender scored good in 3 quality questions and acceptable in 2 quality questions. CCAB showed a clear understanding of the requirements of the service and showed:
- A good understanding of collaboration and partnership working.
 - Use of technology in delivering the service via an online portal.
 - Flexible to needs of residents by offering evening clinics.
 - Will use data collected to continually evolve the service.
 - Strong understanding and proposals for locality working and understanding the demographic breakdown.
 - Use of volunteers.
 - How the service adds economic value back into Croydon.
- 3.9 Whilst only one tender was received the evaluation panel felt it was a strong proposal that exceeded the specification requirements and recommends

CCAB for award.

Carers Services

- 3.10 The tender followed the one stage open procedure as detailed within the tender documents and the tender closed on the 29 September 2019.
- 3.11 The Council received three responses on time and no late submissions.
- 3.12 Organisation B and Organisation C were excluded from the tender process and were not evaluated in full as they operated in the profit sector contrary to the eligibility requirements in the tender document.
- 3.13 Therefore only the response received from Whitgift Foundation Carers Information Service (Whitgift Foundation) was evaluated in accordance with the tender documentation. The tender was evaluated as follows in three sections:

Mandatory and Discretionary Exclusion

Assessment Criteria	Pass/Fail
Mandatory Grounds for Exclusion	Pass
Grounds for Discretionary Exclusion	Pass
Economic and Financial Standing	Pass
Economic and Financial Standing Discretionary Rejection	Pass
Relevant experience and contract examples	Pass
Modern Slavery Act 2015	Pass
Compliance with Insurance	Pass
Compliance with Business Continuity Requirements	Pass
Compliance with London Living Wage or National Living Wage	Pass

Quality Assessment

Quality Question	Question	Weighting	Score out of 5	Weighted Score
1	Service Outcomes and KPIS	15%	3	9%
2	Engagement	15%	4	12%
3	Service delivery model	5%	4	4%
4	Added Value & Innovation	5%	3	3%
5	Social Value	5%	3	3%
6	Presentation to Carers Panel	25%	4	20%
	TOTAL	70%		51%

Price

The price was assessed as the lowest tender received receiving the highest percentage of 30%. As Whitgift Foundation was the only organisation that tendered they received the full 30%. The tender price submitted was within the maximum guide price.

- 3.14 The submitted tender scored good in 3 quality questions and acceptable in 3 quality questions. Whitgift Foundation showed a clear understanding of the requirements of the service and showed:
- Ability to deliver the service and be flexible to changing needs of Carers.
 - Partnership working across Carers sector
 - Understanding of locality working.
 - Ability to develop the service over time by using IT.
 - Changing the way it delivers support into by carrying out bite sized chunks of training rather than full days.
 - Support to BAME carers.
 - Understanding of social value and importance of this to Croydon.
- 3.15 Question 6 of the evaluation was a presentation to a Carers Panel which was made up of 3 independent Carers and 2 officers. The Carers Panel felt that the presentation was good and Whitgift Foundation showed a clear understanding of the service and provided added benefits.
- 3.16 Whilst only one tender was evaluated, the evaluation panel felt it was a strong proposal that exceeded the specification requirements and recommends Whitgift Foundation for award.

Infrastructure support

- 3.17 The tender followed the competitive procedure with negotiation as detailed within the tender documents and the initial tender closed on the 20 September 2019.
- 3.18 The Council received one response on time and no late submissions.
- 3.19 The only response received was a collaborative bid from Asian Resource Centre LTD, Croydon BME Forum, Croydon Voluntary Action, Croydon Neighbourhood Care Association and was evaluated in accordance with the tender documentation. Whilst the Council retained the right to use negotiation if required, from the initial submission on 20 September 19 the evaluation panel agreed that this was not required and any queries would be dealt with by clarification questions. The tender was evaluated as follows in three sections:

Mandatory and Discretionary Exclusion

Assessment Criteria	Pass/Fail
Mandatory Grounds for Exclusion	Pass
Grounds for Discretionary Exclusion	Pass
Economic and Financial Standing	Pass
Economic and Financial Standing Discretionary Rejection	Pass
Relevant experience and contract examples	Pass
Modern Slavery Act 2015	Pass
Compliance with Insurance	Pass
Compliance with Business Continuity Requirements	Pass
Compliance with London Living Wage or National Living Wage	Pass

Quality Assessment

MS	Question	Weighting	Score out of 5	Weighted Score
1	Approach to delivering the service	15%	3	9%
2	Delivering continuous improvement	20%	3	12%
3	Management of the service	10%	3	6%
4	Mobilisation	5%	3	3%
5	Performance	10%	3	6%
6	Social value	10%	4	8%
	TOTAL	70%		44%

Price

The price was assessed as the lowest tender received receiving the highest percentage of 30%. As the collaborative bid was the only organisation that tendered they received the full 30%. The tender price submitted was within the maximum guide price.

- 3.20 Clarification questions and one clarification question meeting was held with all parties of the collaborative bid. The responses to these questions were then considered by the panel and the scores as detailed in section 3.18 were then finalised by the panel.
- 3.21 The submitted tender scored good in 1 quality questions and acceptable in 5 quality questions. The collaborative bid showed a understanding of the requirements of the service and showed:
- How the organisations intend to work together as a collaborative to ensure joint approaches and reducing duplication
 - Which organisations would be the lead for each of the contracted

outcome areas

- A sound experience of delivering support to Croydon organisations and existing well developed partnerships

- 3.22 Whilst only one tender was evaluated, the evaluation panel felt it was a proposal that met the specification requirements and recommends Asian Resource Centre LTD, Croydon BME Forum, Croydon Voluntary Action and Croydon Neighbourhood Care Association for award.

Contract Management & Quality Assurance of the Prevention Fund

- 3.23 The Tender followed the one stage open procedure as detailed within the Tender documents and the tender closed on the 27 October 2019.
- 3.24 The Council received three responses on time and no late submissions.
- 3.25 Organisation C were excluded from the tender process and were not evaluated in full as they operated in the profit sector contrary to the eligibility requirements in the tender document.
- 3.26 Therefore the responses received from Croydon Neighbourhood Care Association (CNCA) and Organisation B were evaluated in accordance with the tender documentation. The tender was evaluated as follows in two sections:

Quality Assessment

MS	Question	Weighting	CNCA		Organisation B	
			Score out of 5	Weighted Score	Score out of 5	Weighted Score
1	Service delivery model	25%	3	15%	2	10%
2	Engagement	20%	2	8%	2	8%
3	Quality & Contract Compliance	15%	3	9%	2	6%
4	Social Value	10%	3	6%	3	6%
	TOTAL	70%		38%		30%

Price

The price was assessed as the lowest tender received receiving the highest percentage of 30%.

Organisation	Weighted Score
CNCA	29.29%
Organisation B	30%

- 3.27 The combined scores below of quality and price shows that CNCA is the

highest ranked bidder:

Organisation	Quality Score	Price Score	Total Score	Rank
CNCA	38%	29.29%	67.29%	1
Organisation B	30%	30%	60%	2

3.28 CNCA tender scored acceptable in 3 quality questions. CNCA showed an understanding of the requirements of the service by:

- Providing local employment opportunities.
- Paying London Living Wage.
- How they will monitor the contract and use of quality assurance.
- How they will support organisations who require DBS checks.

Based on the above, the evaluation panel felt it was a proposal that met the specification requirements and recommends CNCA for award as being the highest scoring tender. The tender price submitted was within the maximum guide price.

Outcomes Approach Over £15K- Tender process

3.29 The tender followed the one stage open procedure as detailed within the tender documents and the tender closed on the 1 October 2019.

3.30 The Council received 90 on time submissions and 2 late submissions. The 2 late submissions were accepted by the Director of Commissioning and Procurement due to login issues on the London Tenders Portal that affected both organisations. The breakdown of these submissions per Outcome theme were as follows

Outcome Theme	Submissions
People Live Long, Happy and Independent Lives	27
Children & Young People Thrive and meet their Potential	21
Access to Homes and Prevention of Homelessness	2
Everybody feels safe in their street, neighbourhood and home	9
Everybody has an opportunity to work and build their career	5
Prevention Fund (Over 65+)	24

3.31 The tenders were evaluated as follows in three sections.

- Eligibility and organisation requirements
- Project proposal
- Value for money

3.32 Details of the evaluation as per the sections in 3.31 are:

Eligibility and organisation requirements

All 90 organisations' submissions were checked against the following pass/fail criteria below and all passed these criteria:

- A Non-Statutory Organisation
- Operates in the Not For Profit Sector
- Deliver services or plan to deliver services in Croydon
- Financial Management
- How are you governed and led?
- How do you plan your activities?
- Managing your organisation
- Managing people
- Safeguarding
- Advancing Equalities
- Insurance Levels

Project proposal & value for money

All 90 tenders were evaluated against the criteria in the Outcomes Prospectus. Evaluation panels were set up for each Outcome which included officers, residents and young commissioners who evaluated on the criteria listed below.

Question	Weighting
Describe your project	10%
Evidence of need	15%
Users engagement	10%
Measure of success	10%
Social Value	10%
Collaboration	15%
Value for money	30%
TOTAL	70%

3.33 Following the evaluation of all tenders as per the Outcomes Prospectus the below tender bids are recommended for award per Outcome:

Outcome	Bid	Awarded Value	Project
People Live Long, Happy and Independent Lives	Metro	£207,698	Croydon HIV Living Service Integrated community-based model of support for people living with HIV within all areas of Croydon
	Mind in Croydon	£168,676	The Active Minds project supports people with mental health problems to access mainstream sports and healthy lifestyle activities in the community.

Outcome	Bid	Awarded Value	Project
	Whitgift Foundation Carers Information Service	£120,000	A free Health and Wellbeing Service for carers of people who need help due to illness, disability or old age. Services include a Carers Café, self – help groups and social and physical activities.
	The Family Centre	£90,000	Extend existing café opening hours, to include a lunch club for older people. Project also includes establishing a food education programme and Croydon Fare Share Pantry (Foodstop).
	Asian Resource Centre	£120,000	The programme will bring together 5 grassroots organisations. The partnership's overall aim is to support older Asian people to live a healthier and more connected life free from isolation, loneliness and poor health
	Croydon Mencap	£104,746	Supported Volunteering Buddies, is a formal partnership between Mencap and CVA to provide meaningful volunteering activities for those with ongoing support needs, focusing on adults with Learning Disabilities.
Children & Young People Thrive and meet their Potential	Play Place (South)	£118,355	Provision of 250 free culturally diverse activities, clubs and holidays to achieve better outcomes for 300 young people aged 8 and over
	Metro	£100,860	Holistic package of support to LGBTQ young people, including: 2 weekly youth groups, one to one support liaising with families, community outreach events, workshops for schools and capacity training.
	Reaching Higher	£120,000	Early intervention programme to 250 young people aged 11-16 identified by schools as being disadvantaged. Programme includes, group sessions, 1-2-1 weekly coaching, work with primary schools on transitions, training and supporting peer mentors and community based activities.

Outcome	Bid	Awarded Value	Project
			Programme will target schools with low attainment scores.
	Play Place (East)	£117,791	8 partners engaging 400 people across 6 social housing communities to provide educational activities, sports, programme of mechanical skills, specific information sessions for young women and holiday and food schemes.
	Generating Genius	£89,250	Programme to provide range of stimulating, engaging and accessible activities for 12-15-year olds to help prepare for academic and career success with focus on key professions underrepresented by state-educated pupils. (STEM, Medicine, Finance, Politics & law)
	Duffus Cancer Foundation	£116,323.71	24 programmes per year consisting of 3 sessions to support young people in a group setting, giving the tools to live resiliently and cope with life challenges. Based on University research, the programme focuses on building resilience, how to lead a healthy lifestyle, stress management, communication and relationships.
	JAGS	£89,757	Accredited programme to work with vulnerable and socially disadvantaged females aged 11-18 and aims to empower young people to reject negative narratives by providing necessary leadership skills through arts based therapy and social action.
Access to Homes and Prevention of Homelessness	Crisis	£120,000	Accommodating homeless EEA nationals with no entitlement to public funds, whilst not in employment. The project combines an accommodation offer with intensive coaching and employment support, which supports the individual into work as soon as possible.
Everybody feels safe in their street,	Croydon Drop In	£152,088.95	Multi-skilled mobile resource (Talk Bus), engaging face to face with children and young people of all

Outcome	Bid	Awarded Value	Project
neighbourhood and home			ages and their friends and families
	Bromley & Croydon Women's Aid	£89,259.57	Strengthen the provision of abuse services for BAME women by offering prevention and bespoke support services
	Rape and Sexual Abuse Centre	£112,865.56	Provide sustained and consistent support to female survivors of domestic abuse and their children
	Metro	£86,641.40	Creating a safe space situated between hate crime victims and statutory agencies where they can discuss their cases face to face and gain support and information.
	Croydon BME Forum	£88,124	Multi-agency and collaborative approach to reduce violence. Project co-ordinator to manage various forums including BME Serious Youth Violence Forum
Everybody has an opportunity to work and build their career	CAYSH	£111,432.78	Partnership with CVA to run volunteer mentoring programme, providing homeless young people (16-25) with intensive support in employability
Prevention Fund (Over 65+)	Upper Norwood Association for Community Care	£116,797.44	UNACC support 100s of residents each year through this holistic health/social package for older
	Croydon Vision	£119,066.05	Provides a range of activities for members and their families/carers who are blind or partially sighted.
	Contact-Selsdon Churches Neighbourhood Care	£88,550.89	Partnership between the local churches, the local authority and the community to provide services, information and advice that help elderly and vulnerable residents remain independent in their own homes
	Croydon African Caribbean Family Organisation-UK	£89,997	Provision of adult day services at CACFO Adult Day Centre
	New Addington Good Samaritans	£101,068	Stay physically and mentally active by providing residents with a safe, therapeutic and friendly environment, thereby reducing isolation and improving their quality of life.

Outcome	Bid	Awarded Value	Project
	Shirley Neighbourhood Care Association	£81,052.88	Deliver services that enhance elderly residents to live independently for as long as possible and combat loneliness
	Addiscombe Neighbourhood Care Association	£65,390	The provision of services that target support, prevention and intervention including: Lunch Club, escorted shopping bus service, exercise classes, advice, loan of equipment and outings. Operating in the Addiscombe area
	Westbury Community Project	£219,262.50	The Westbury Community Project provides a day service at the Mercedes Amos Day Centre for older people over the age of 65
	Croydon Neighbourhood Care Association	£122,758.82	Befriending very vulnerable, frail elderly people and their carer's. The service is to provide a home visit, telephone call and to "keep in touch" with carer's.
	Parchmore Methodist Church and Community Centre	£120,000	Parchmore 65's+ service will provide activities and support for older people in Thornton Heath
	Purley and Coulsdon Club for the Elderly	£89,925	PACE is a community-led day opportunity and support service for older people with some physical disabilities who look after themselves, perhaps with the assistance of a carer.
	South Norwood and Woodside Community Association	£89,250	Vibrant diverse group who welcome mainly older people who need support to live independently and to not be socially isolated.
	AGE UK Croydon	£120,000	Memory Tree Café to partner with the multi-disciplinary Dementia Pilot to establish a community hub where service users can access services in one place
	Purley Cross Community Information Centre	£83,379.65	PCC is a Community Hub offering an accessible service to members of the local community and surrounding areas. Provides info training, advice and help to live independently

Outcome	Bid	Awarded Value	Project
Total Awards	34 awards totaling £3,830,359		

- 3.34 The recommended awarded Organisations will deliver against the Corporate Plan objectives that have been highlighted in section 2.8 of this report.
- 3.35 The submissions were of very high quality and tender application bid values exceeded the available budget and were assessed in accordance with the prospectus. Full details of the evaluation are included in Part B of this report. From the evaluation panels the Organisations in section 3.33 of this report are recommended for award.

Outcomes Approach under £15K grant bids

- 3.36 The Councils small grants bids opened for applications on 1 September 19 and closed on 3 October 2019. The Council received over 110 applications and were evaluated by Council officers. This was a separate process from the Over £15K Outcomes Approach as it followed a grant process rather than procurement process.
- 3.37 From the applications received, 19 projects have been recommended for grant award and have been approved under delegated powers by the Cabinet member for Safer Croydon & Communities at an award value of £233,281 for a period of one year. The applications that have been approved are:-

Outcome	Organisation	Awarded Value	Project
People Live Long, Happy and Independent Lives	Club Soda	£10,483	Gig Buddies – is a project designed to build positive and equal relationships amongst people with and without learning disabilities; gaining better accessibility at venues and improving accessible information about leisure opportunities
	Croydon BME Forum	£10,000	Black History Month Launch and events - seeks to promote community cohesion and resilience through activities that promote 'neighbourliness' and intercultural understanding.
	Old Lodge Lane Baptist Church	£4,942	Community Connect/Food Stop promotes the Council's Gateway approach into the community via a single

			access point (community hub).
	African Youth Development Assoc	£14,730	Project aims to address cultural/traditions taboos by speaking out about FGM and establish more positive community relationships.
	Caridon Foundation	£11,820	To address avoidable health and socio-economic inequalities for some of Croydon's most disadvantaged residents using Sport, Education, Employment opportunities and counselling.
	Young Roots	£14,895	Support highly vulnerable & isolated young people to reduce social isolation and anxiety through weekly girls' group activities
	Parents in Partnership	£14,763	Support families of young people with learning or other disabilities who are about to transition to adulthood
Children & Young People Thrive and meet their Potential	Cassandra Centre	£12,000	To reduce the emotional impact of DV on children, to build confidence through art, craft, talking therapy, targeting children from BAME communities.
	British Refugee Council	£14,999	The Youth Development Project aims to help 325 young people in Croydon to take the first steps towards rebuilding their lives
	Waggy Tails Club	£2,200	Help children who suffer from mental as well as physical disabilities to make friends and develop their social and communication skills through interaction with dogs and dog-related activities
	The Chartwell Cancer Trust	£14,000	Using technology to allow young cancer and leukaemia patients to access education during and after treatment – virtually attending school, socialising with classmates and remaining in contact with peers and support networks

	Lions Society	£14,999	Young ambassadors programme teaching young people to be responsible active citizens, giving young people a voice
	Gloves Not Gunz	£14,999	Project aims to divert and prevent young people from engaging in negative lifestyles such as drugs, violence and gangs
Access to Homes and Prevention of Homelessness	Parchmore Road Methodist Church	£14,000	Parchmore Community Connect/Food Stop
Everybody feels safe in their street, neighbourhood and home	Freedom Together	£14,402	Main aims are to educate, empower and support women who are affected by domestic abuse and/or sexual violence.
	Croydon Borough Neighbourhood Watch Association	£14,000	Crime Prevention days, working with schools to promote safety, working with CALAT, newsletters, training, welcome packs and recruit more coordinators
Everybody has an opportunity to work and build their career	Disability Croydon	£14,999	Project to offer range of specialist employment services specifically focusing on barriers facing disabled people seeking employment. To provide support and training, emphasising confidence building and skills development
Prevention Fund (Over 65+)	Old Coulsdon Centre for the Retired	£14,950	To improve the conditions of life for the retired by providing facilities, in the interests of social welfare, for recreation and leisure.
	Croham Hurst Good Neighbours	£6,000	The project supports and befriends old people with house visits, shopping, social activities, outings, form filling and minor repairs in flats and houses.
TOTAL	19 Grant awards at a total of £233,281		

Contract Award and Value

3.38 In summary it is recommended to award Contracts as below:

Tender	Organisation	Contract Value
Advice Services	Croydon Citizens Advice Bureau LTD	£999,000
Carers	Whitgift Foundation Carers Information Service	£1,416,171
Infrastructure Support	A collaboration consisting of:- <ul style="list-style-type: none"> • Asian Resource Centre Croydon LTD • Croydon BME Forum • Croydon Voluntary Action • Croydon Neighbourhood Care Association 	£750,000
Contract Management & Quality Assurance of the Prevention Fund	Croydon Neighbourhood Care Association	£120,000
Outcomes Approach	34 awards for Bids detailed in section 3.33	£3,830,359
TOTAL		£7,115,530

Contract and Performance Management

- 3.39 Contracts and how they will be performance managed are detailed in the specifications and contracts for each of the five tenders. The lead officer for the Community Fund will be the Director of Policy & Partnership and the Director of Integration and Innovation for the prevention fund. Contracts will be managed by staff across the Council with support from the Commissioning and Procurement team. Regular meetings and reporting with the respective awarded Organisations will be proportionate to the size of each contract award.

Commissioning and Procurement Options

- 3.40 There was no deviation from the agreed procurement strategy and the recommended awards are detailed in this report. Due to this there are no other commissioning and procurement options that have been considered.

4. CONSULTATION

- 4.1 Extensive engagement was undertaken to inform the VCS strategy as detailed in the procurement strategy.
- 4.2 As part of the development of the tender documents for the tenders listed in this project, market engagement was carried out with the VCS sector in two stages:

- **Engagement Events Part 1-** Two sessions were held with over 80 organisations in attendance to review the proposed tender process for the Community Fund, review lessons learnt from the current Community Fund and listen to suggestions from VCS organisations on how it is best to carry out the process.
- **Engagement Events Part 2-** Three sessions were held with over 80 organisations in attendance to review the outcomes of the first engagement session and inform VCS organisations of how to apply and support that they will be provided by the Council and VCS infrastructure organisations.

4.3 For the Carers, Advice and Infrastructure, further market engagement sessions were held for specific focus on these tenders before the tender documents were issued through the tenders portal.

5. PRE-DECISION SCRUTINY

5.1 This report did not go to a pre-decision Scrutiny meeting as this report is for information only as the decisions were delegated to the Cabinet Member for Safer Croydon & Communities in consultation with the Cabinet Member for Families, Health and Social Care and the Cabinet Member for Finance and Resources.

6 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

6.1 Revenue and Capital consequences of report recommendations

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2019/20 £'000	2020/21 £'000	2021/22 £'000	2022/23 £'000
Revenue Budget available				
Expenditure		2,698	2,698	2,698
Income				
Effect of decision from report				
Expenditure		2,604	2,367	2,378
Income				
Remaining budget		94	331	320
Capital Budget available				
Expenditure				
Effect of decision from report				

Expenditure

Remaining budget

- 6.2 **The effect of the decision-** The effect of this decision is detailed above based on tender awards for 3 years, and grant awards for 1 year. The budget available in 20/21 includes the emerging needs fund, and in 21/22 and 22/23 the budget includes both emerging needs fund and small grant awards. As these amounts have yet to be awarded, the table above shows a remaining budget for future years, but this will be awarded in due course.
- 6.3 **Risks-** There are no direct financial risks by awarding the tenders and grants as detailed in the report. The Council has committed to increase funding compared to the last three years in the VCS sector. Risk of failure to deliver the required services will be monitored by officers during regular contract monitoring.
- 6.4 **Options-** Options explored for delivery were identified in the approved procurement strategy. The only option would be not to fund these projects, however the Council has a strong commitment to the VCS via its VCS strategy and understand the important work that they do in contributing to the Councils Corporate Plan.
- 6.5 **Future savings/efficiencies-** No further savings or efficiencies were identified. This reports details key contracts and grants to VCS Organisations to deliver key Council priorities.

Approved by: Ian Geary, Head of Finance, Resources

7 LEGAL CONSIDERATIONS

- 7.1 There are no additional legal considerations arising directly from this report

Approved by Sonia Likhari, Lawyer, on behalf of the Director of Law and Governance.

8 HUMAN RESOURCES IMPACT

- 8.1 There are no immediate HR implications that arise from the recommendations in this report for Croydon Council employees or staff. If any arise these will be managed under the Council's policies and procedures.

Approved by: Jennifer Sankar, Head of HR Place & GSE, on behalf of Sue Moorman, Director of Human Resources

9 EQUALITIES IMPACT

- 9.1 A full Equalities Impact Assessment was carried out as part of the Community

Fund Strategy and evidence shows there is no potential for discrimination with positive opportunities to advance equality and foster good relations. Steps are being taken to actively monitor and review this principle. The Equality Analysis formed part of the 25th March 2019 considerations.

- 9.2 The recommended awards in this report support and deliver projects for residents with protected characteristics across borough and locality working. Included are projects that will specifically support residents in terms of age, gender, disability and sexual orientation. This reflects the importance placed on equalities by that, the Council during the tender and grant award process.
- 9.3 The Equalities Impact Assessment has been updated in light of the recommended contracts and grant awards detailed in this report.

Approved by: Yvonne Okiyo, Equalities Manager

10 ENVIRONMENTAL IMPACT

- 10.1 Within the tender process Organisations were asked to provide details of how their schemes will contribute to the Councils Social Value priorities which includes Environmental Impact. From the tender returns Organisations have put forward proposals on how they will contribute to a green borough, reduce waste, increase recycling and reduce CO2 consumption. As part of Contract mobilisation officers will work with these Organisations to ensure their proposals are delivered.

11 CRIME AND DISORDER REDUCTION IMPACT

- 11.1 The Outcomes Approach tender and grant awards focused on Organisations submitting proposals that contribute to the Council Plan outcome of 'Everybody feels safe in their street, neighborhood and home'.
- 11.2 Awards that are recommended contribute to this which will deliver on developing services that support survivors of domestic and sexual violence and work in partnership to develop an approach to tackling serious youth violence and knife crime

12 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 12.1 The recommended list of Organisations for each tender are listed in section 3.38 of this report. The Organisations have demonstrated through the evaluation process that they can deliver the services required to support the Councils Corporate Plan and VCS strategy. All Organisations recommended met the minimum quality criteria to be recommended for award.

13 OPTIONS CONSIDERED AND REJECTED

- 13.1 Options that were considered were not to award the Organisations within this report. However as the tender responses and grant applications were of high quality this was dismissed and recommendations are made within this report.

14 DATA PROTECTION IMPLICATIONS

14.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

YES

14.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

YES

An initial DPIA has been completed. As each of the projects are unique then before Contracts are signed and agreed the DPIA will be updated and individual agreements put in place per Contract.

Approved by the Director of Policy & Partnership

CONTACT OFFICER:	Stephen Hopkins Head of Children & Adults Placement & Brokerage
APPENDICES:	None
BACKGROUND PAPERS:	Updated Equalities Impact Assessment

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For General Release

REPORT TO:	CABINET 20 JANUARY 2020
SUBJECT:	Policy for Council community properties, rent subsidy and rate relief for the voluntary and community sector
LEAD OFFICER:	Jacqueline Harris Baker, Executive Director of Resources and Monitoring Officer Gavin Handford, Director of Policy and Partnership
CABINET MEMBER:	Councillor Hamida Ali, Cabinet Member for Safer Croydon & Communities Councillor Simon Hall, Cabinet Member for Finance and Resources
WARDS:	All
CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON <p>The Corporate Plan and Voluntary & Community Sector Strategy recognise the importance of working in partnership to deliver the priorities and outcomes we have promised in new and creative ways. This includes working with the voluntary and community sector. This policy will enable the Council to make best use of its premises-related support to the sector.</p>	

FINANCIAL IMPACT

The financial impact is neutral. The budget for rent subsidy and discretionary rate relief will not change as a result of these proposals. Any extra income raised from charging market rents instead of peppercorn rents will be used to provide rent subsidy for qualifying organisations.

FORWARD PLAN KEY DECISION REFERENCE NO.: 0220CAB

The notice of the decision will specify that the decision may not be implemented until after 13.00 hours on the 6th working day following the day on which the decision was taken unless referred to the Scrutiny and Overview Committee.

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

Having due regard to the consultation outcomes detailed in Section 12 of this report, Cabinet is recommended to:

- | | |
|-----|--|
| 1.1 | Adopt the policy for the allocation of council community properties to voluntary and community organisations and groups, providing rent subsidy and discretionary rate relief set out at Appendix 3. |
| 1.2 | Agree that the provisions for the allocation of council community properties to voluntary and community organisations and groups is implemented from 1 April 2020. |
| 1.3 | Adopt the framework for setting market rents in council community properties to be effective from 1 April 2021. |
| 1.4 | Agree that the provisions for allocating rent subsidy to eligible voluntary and community organisations and groups renting community properties owned or leased by the Council are implemented from 1 April 2021. |
| 1.5 | Agree that the provisions for allocating discretionary relief from national non-domestic rates to voluntary and community organisations and groups are implemented from 1 April 2021. |
| 1.6 | Delegate authority to the Director of Policy and Partnership in consultation with the Cabinet Member for Safer Croydon & Communities to make the administrative preparations required to implement the policy adopted under 1.1. |
| 1.7 | Note the proposal to review this policy in 2023 |

2. EXECUTIVE SUMMARY

- 2.1 The Voluntary and Community Sector (VCS) is a key partner of the Council in delivering services and support to residents of Croydon. The Council is a strong contributor to the VCS in Croydon, providing significant funding and staff support through various teams, its commissioning and procurement function and the One Croydon partnership.
- 2.2 The availability of affordable premises and space for events is a major challenge for VCS organisations and groups. The Council supports VCS organisations in respect of premises and associated subsidies in a number of ways, in total worth more than £0.5m a year. Its intention is to continue supporting the sector at the same level, but focus this assistance on organisations that support the priority outcomes in the Council's [VCS Strategy](#) (adopted in March 2019) and have the greatest community impact and need, and spread the benefit of funding as widely as possible.

- 2.3 The provisions in this policy give effect to the pledges made in the VCS strategy relating to premises related support. It covers the allocation of council community properties, sets a framework for charging rents for those properties, and the allocation of rent subsidy and discretionary business rate relief to voluntary and community organisations. It provides transparency on how support is allocated and offers equality of opportunity to organisations that have not received funding to date, while operating within the Council's budgetary constraints.
- 2.4 Consultation on the draft policy was undertaken between 9 October and 19 November through an online survey and engagement event. A wide range of VCS organisations responded. 63 took part in the survey and 21 VCS representatives attended the engagement event. Responses were broadly supportive of the proposals across the board.
- 2.5 The budget for rent subsidy and discretionary rate relief (DRR) will no change as a result of the policy. Any extra income raised from charging market rents instead of peppercorn rents will be used to provide rent subsidy for qualifying organisations. The policy for allocating council community properties would come into effect on 1 April 2020. The new rent charging framework and policies on rent subsidy and DRR would take effect from 1 April 2021.

3. VOLUNTARY AND COMMUNITY SECTOR STRATEGY 2019-23

- 3.1. In March 2019 the Council adopted a VCS Strategy that provides a framework for prioritising the Council's support and resources for the VCS while working in partnership with it to deliver for Croydon. A summary of the priority outcomes within the strategy is set out in Appendix 1.
- 3.2. Engagement with VCS organisations during the development of the VCS Strategy highlighted that the availability of affordable premises and space for events was a major challenge for the VCS.
- 3.3. There was a desire for greater transparency and clearer guidelines about how and why organisations are allocated council community premises or paid rent subsidy or discretionary relief from national non-domestic rates (commonly known as business rates), when many others do not receive such support. Organisations also said that there should be more monitoring of performance and of usage of allocated premises.
- 3.4. The VCS Strategy therefore includes a number of actions for the Council concerning premises related subsidies:

- Develop clear criteria for allocating properties and rent subsidy, requiring organisations to support our priorities and making the sharing of premises a desirable requirement.
 - Allocate properties for a limited term; performance and the level of use of the premises will be monitored regularly.
 - Improve transparency by transitioning from peppercorn rents for community properties to market rents, with rent subsidy provided where appropriate.
 - Encourage organisations to share available space: we will amend our leases to allow occupiers to sublet to approved organisations and develop proposals in 2019/20 to facilitate the exchange of information on spaces offered and spaces sought by VCS organisations.
- 3.5. The new rent charging framework and policies for allocating council community properties, Rent Subsidy and DRR seek to implement these actions.

4. CURRENT APPROACH

- 4.1. Premises are a critical area of support for VCS organisations. However, they are an expensive resource that is often in short supply. The Council supports voluntary and community organisations in respect of premises and associated subsidies in a number of ways, in total worth more than £0.5m a year.
- 4.2. In order to make council-owned community premises more affordable, many rents are charged at only a peppercorn rent (for 51 premises), or the Council provides Rent Subsidy to support the VCS with premises costs. The Council provides DRR in addition to the 80% mandatory rate relief that may apply. It also provides and fully funds internal and external repairs to its properties, buildings insurance and statutory inspections, a significant subsidy in itself.
- 4.3. The Council's approach to premises related subsidy and support to the VCS has lacked an integrated approach. There has been no formal adopted policy or procedure for allocating council community properties and setting the rents for such properties, and determining which organisations should benefit from Rent Subsidy and DRR. The draft policy is designed to rectify this.

Rent subsidy

- 4.4. The Council is providing £245,000 in Rent Subsidy in 2019/20 for 19 premises. The subsidy benefits a range of organisations including sports clubs, scouts associations, residents associations, youth and community centres as well as larger VCS organisations.
- 4.5. The budget is fully allocated against historic commitments, and the council is therefore not able to consider any new applications for Rent Subsidy under

current arrangements. No assessment is currently made on the community benefit provided by the organisations receiving funding.

Discretionary Business Rate Relief

- 4.6. Charitable organisations such as registered charities are entitled to 80% mandatory relief for national non-domestic rates ('business rates') wherever they are located. This cost is absorbed by central government.
- 4.7. Discretionary Business Rate Relief (DRR) provides further discount on non-domestic rates. If Discretionary Business Rate Relief is offered by the Council, it is required to be met from Council resources.
- 4.8. In 2019/20 a total of £143,000 was awarded in DRR to 47 organisations in respect of 69 properties. While the vast majority of organisations receive a 20% top-up in DRR to their mandatory rate relief, three payments cover 100% discretionary relief where groups did not qualify for mandatory relief.
- 4.9. There are currently three simple eligibility criteria. These are that the organisation is Croydon based, not for profit and meets basic requirements regarding governance, financial management and equalities.
- 4.10. Most of the payments are low value: 51 (74%) of payments are below the average of £2,075, but nearly 50% of the total budget is paid to just seven organisations.
- 4.11. As with Rent Subsidy, the current DRR budget is fully allocated, and the Council is unable to consider any new applications for DRR under current arrangements. No assessment is currently made on the community benefit provided by the organisations receiving funding.
- 4.12. The Council operates a separate scheme (approved by cabinet in December 2016) for providing discretionary rate relief to increase or safeguard the number of jobs in the borough by supporting inward investment from large companies bringing significant numbers of new jobs to the borough; supporting smaller business to locate in the area and help them through difficult periods to become sustainable in the longer term; and bringing empty space back into use to support the economy. Under that scheme, the council uses its discretion to pay up to 100% of the business rates charge having regard to the impact on other residents and tax and rate payers in the borough and the affordable budget available. Awards are made for one year, with no guarantee of renewal. The proposals in this report will have no impact on this scheme. Ratepayers are not eligible for relief under that scheme if they are eligible for any mandatory or other discretionary relief and/or they could receive relief as a non-profit making organisation or as a sports club or similar.

5. PRACTICE IN OTHER LOCAL AUTHORITIES

- 5.1. In developing the draft policy, the Council looked at how other local authorities provided premises related support for the VCS.
- 5.2. Many authorities do not offer any rent subsidy at all. Those that do only support organisations in council owned premises and require organisations to provide a community benefit. We are not aware of any authority that offers rent subsidy to VCS organisations renting privately.
- 5.3. The level of rent that is subsidised varies. Some councils require VCS tenants to pay for repairs, insurance and statutory services to council community buildings, reducing the value of the rent subsidy they provide. Some only pay subsidy to community centres.
- 5.4. DRR is provided by more councils than rent subsidy, but by no means all offer this support. Some will only support organisations that qualify for mandatory relief, and pay 20% top-up relief so that organisations pay no business rates at all. Others offer partial relief only, but exclude organisations getting 80% mandatory relief. Generally, organisations must apply annually for DRR.
- 5.5. The analysis demonstrated that Croydon Council continues to provide a strong level of financial support for the VCS, and more than most local authorities.

6. DRAFT POLICY OBJECTIVES

- 6.1. In drafting the policy proposals, the Council is seeking to offer organisations equality of opportunity to access premises and subsidies, ensure value for money and to spread the benefit as widely as possible across the VCS.
- 6.2. A number of objectives have been included in the draft policy, and are aligned to the priorities within the VCS Strategy:
 - Focus funding on VCS organisations with biggest community impact and greatest need.
This is considered to be those organisations that support VCS Strategy priority outcomes, operate in areas of the greatest deprivation, use their properties as intensively as is practicable and those with the greatest financial need.
 - Focus funding on VCS organisations occupying council community properties
This is proposed for phase 1 (2021-2024). From 2024/25, subject to a review in early 2023, the policy proposes the option to open the rent subsidy

scheme to applications from VCS organisations renting premises in the private sector, thus further widening the number of organisations that would be eligible.

- Provide transparency on how rents are charged, subsidies are offered and council community properties are allocated.
- Spread the benefit of the funding as widely as possible, offering opportunity to organisations that have not received funding to date, while operating within the council's budgetary constraints.

7. DRAFT POLICY PROVISIONS: RENT SUBSIDY

- 7.1. It is proposed that a new application process be introduced for rent subsidy. In order to provide some stability to VCS organisations, and enable them to plan in the medium to long term, it is intended that rent subsidy will be awarded to successful applicants for a period of 3 years. The scheme will offer rent subsidy up to 100% of the contractual rent.
- 7.2. Whilst rent subsidy funding will be awarded for 3 years, it will be with a requirement for annual monitoring and the ability to amend or remove rent subsidy if the recipient no longer qualifies.
- 7.3. Clear eligibility criteria will be introduced. Organisations will need to be:
 - Community led, a co-operative [or a social enterprise](#);
 - Properly constituted, with good governance;
 - Capable of sustainably, legally and safely managing an asset and delivering services;
 - Compliant with the Equality Act 2010; and
 - Willing to offer space (if available) and support to smaller groups.
- 7.4. The organisations will also need to provide services that support the Council's VCS strategy (see Appendix 1) and these services must be delivered primarily for the benefit of Croydon residents. At least 75% of beneficiaries must be Croydon residents.
- 7.5. Profit making organisations (other than co-operatives and social enterprises), faith groups using premises mainly for religious purposes, and organisations providing services to a restrictive membership group will be excluded from receiving rent subsidy.
- 7.6. Where an organisation wholly or mainly sublets the premises to other organisations, then the property may be eligible for rent subsidy on condition that the subtenants are VCS organisations approved by the Council and the

amount paid by the subtenant is no more than a charge to cover the organisation's reasonable costs of managing and running the building. The organisation's rent subsidy will only be reduced if it is making a profit from the arrangement.

- 7.7. If an organisation receives rental contributions from other council grants or commissioning, they will not be eligible to apply for rental subsidy. This ensures there is no duplication in funding contribution.

Assessment

- 7.8. Even with the exclusions above, there will be more eligible organisations than there is funding to support. Therefore, an assessment process will be utilised to score and prioritise applicants for rent subsidy.
- 7.9. Priority will be given to organisations that:
- Make greater use of the premises
This will encourage organisations to make valuable community assets available throughout the week, offering more services and support to local communities.
 - Share premises with other VCS organisations
This will also increase availability of valuable community assets. However, where it is agreed that organisations cannot share premises, they will not be disadvantaged.
 - Deliver services in areas of the greatest deprivation
 - Are critical for achieving priority outcomes
- 7.10. The Council will seek to develop a web-based system to put VCS organisations and groups that have available space(s) within their premises in touch with other VCS organisations and groups that are looking for premises or space.
- 7.11. A financial assessment will form part of the application, with priority given to organisations with a lower gross annual income. Organisations with higher levels of gross annual income will be expected to demonstrate how they have secured funding from non-council sources. This will target funding where it is most needed, whilst also encouraging VCS organisations to be less reliant on council funding.
- 7.12. Any organisation with reserves equivalent to more than two years' operating costs will not receive funding.

8. DRAFT POLICY PROVISIONS : DISCRETIONARY RATE RELIEF

- 8.1. It is proposed that a new application process also be introduced for DRR. As the amounts awarded are generally lower, it is considered less critical to provide a multi-year award. Therefore, it is intended that DRR be awarded on an annual basis.
- 8.2. DRR will be paid at 20% of the total business rate charge. Some eligible VCS organisations may also qualify for mandatory rate relief, which is paid at 80% of the business rate charge. If so, DRR will provide a top-up to provide 100% relief. This policy seeks to encourage organisations to apply for mandatory rate relief, as it brings in central government funding and frees up the Council's DRR budget to support other organisations.
- 8.3. Revised eligibility criteria for DRR will be introduced. Organisations will need to:
- Be community-led, a co-operative or or a social enterprise
 - Support priority outcomes of the Council's VCS strategy (see Appendix 1)
 - Meet requirements on governance, management and financial competence
 - Comply with the Equality Act 2010
- 8.4. The organisations will also need to provide services that support priority outcomes in the Council's VCS strategy (see Appendix 1) and these services must be delivered primarily for the benefit of Croydon residents. At least 75% of beneficiaries must be Croydon residents.
- 8.5. The following organisations will not be eligible for discretionary rate relief
- charity shops and cafés operated by trading arms of charities
 - housing associations
 - buildings used mainly for worship or to promote religious belief
 - bodies operating a restrictive membership policy, unless they are fulfilling a special need within the community
 - profit making organisations (other than co-operatives and social enterprises)
 - empty properties
 - social clubs.

It should be noted that buildings registered for public religious worship or church halls are exempt from business rates altogether.

Assessment

- 8.6. Applications will open in October each year, with a closing date of 31 October. Assessment of applications would take place in November and December with decisions taken by March at the latest (see 8.10 and 8.11). It is anticipated that the total relief sought by eligible organisations will exceed the budget available.

- 8.7. VCS organisations will be asked to submit an application form for DRR, their most recent audited/checked accounts, the amount and purpose of funding currently received from the council and other sources and a business plan or budget to allow an assessment of their financial management and viability.
- 8.8. Priority will be given to organisations with lower rateable values. It is proposed that applications will be ranked according to the rateable value of the property, from lowest to highest. Rate relief will be allocated, starting with the lowest amount of relief to be awarded, until the budget is fully allocated.
- 8.9. Using rateable value is administratively simple, encourages organisations to avoid higher value properties and use buildings with a lower rateable value.
- 8.10. The allocation system prioritises smaller qualifying organisations, although there is no guarantee that an organisation will get relief two years in a row, even if its circumstances have not changed. This is because it will be dependent on the total applications received.
- 8.10 Awards in valuation years:** every three years the government's Valuation Office Agency will calculate the rateable value of each property. The next valuation year is 2021, the first year of the implementation of the provisions in this policy relating to DRR. As some rate bills can vary considerably as a result, the Council will calculate the DRR to be awarded only once the new rateable value is known and the Government has notified the Council of the multiplier to be used to calculate the business rate charge. A decision letter will be sent to the organisation in March.
- 8.11 **Awards in non-valuation years:** in order to give organisations a decision as early as possible, subject to administrative arrangements, the Council will calculate the DRR amount on the basis of the old year's business rate charge and issue a decision in January. It is likely that the new business rate charge will subject to an increase for inflation (applied through the multiplier set by central government). The VCS organisation would therefore have to pay the difference between the DRR awarded (20% of the old year's business rate charge) and the new rate charge, and would receive a bill asking for the difference in April.

9. DRAFT POLICY PROVISIONS: ALLOCATION OF COMMUNITY PROPERTIES

- 9.1. The Council works closely with the VCS to identify suitable future uses for vacant space within its community properties portfolio. Allocation may be through Community Asset Transfer (CAT), competitive tender, or through

discussion with specific groups identified as suitable occupiers for the space concerned.

- 9.2. CATs transfer the council asset to the occupying VCS organisation on a long lease at a peppercorn rent. The organisation takes on full responsibility for the cost of running the building. A CAT may be appropriate if a council property asset is surplus to requirements, the Council considers that the VCS organisation is better placed than itself to deliver the service in question, and the transfer would enable them to benefit from grant funding available to organisations with longer leases.
- 9.3. The Council will publish a list of council community premises and their lessees. These properties will be available to organisations delivering services primarily for the benefit of Croydon residents, and that support the priority outcomes in the VCS Strategy (see Appendix 1). Organisations will need to be properly constituted, capable of managing an asset, willing to offer space to smaller groups and compliant with the Equality Act 2010.
- 9.4. The supply of council properties is insufficient for all potentially eligible VCS organisations that may need premises. The Council will therefore consider applications according to a number of criteria including:
 - The soundness of the business case for why the building or land is needed
 - The community benefit offered by the organisation
 - Local need for the service
 - Financial management and viability: VCS organisations will be asked to provide their most recent audited/checked accounts, a business plan or budget, and sources of funding.
 - Ability for the organisation to manage an asset and comply with the lease obligations.

10. DRAFT POLICY PROVISIONS: RENT CHARGING FRAMEWORK

- 10.1. It is proposed to establish a framework for charging VCS organisations market rents for council community properties, rather than peppercorn rents. Instead, subsidy will be provided through rent subsidy. This approach provides greater transparency.
- 10.2. The market rent will reflect the geographical location, the use, the physical condition and the repair liability applicable to the property. However, a market rent for a D1 (community use) property may be significantly lower than the market rent for other properties classified for alternative commercial use.

- 10.3. Although rents will be individually assessed, given the nature of Croydon's community buildings and their current occupation, it is proposed that a simplified approach be adopted:
- Basic properties offering community activities that actively support the council's key policies will give rise to a rental value in the region of £4 per square foot per annum (it is assumed most will fall within this category)
 - Buildings that offer more potential for third party/commercial letting will be valued at £8 per square foot per annum or higher where the property is predominantly used as office space, is in a specific geographical location commanding higher rental values (such as a town centre), or involves a use that generates a significant income.
- 10.4. Any additional income raised by moving from peppercorn rents will be utilised for the continued funding of the VCS sector, such as through rent subsidy, and the provision of council services.
- 10.5. Exceptions to the above framework will include properties such as scout sites, where, due to the restrictive nature of the use, a standard rent of £500 per annum will be applied. There will also be some instances where a volunteer group with no income is undertaking a service on behalf of the Council where it is appropriate to continue to charge a peppercorn. Where a VCS organisation is investing capital to fit out premises, the Council may agree a rent-free period in recognition of this investment.
- 10.6. There will be no change to the current rent charged where there is an existing lease or agreement that sets the rent. There will also be no change to properties that are subject to a Community Asset Transfer.

11. IMPLEMENTATION

- 11.1. The proposed changes to the funding schemes may have an impact on those organisations currently in receipt of the funding.
- 11.2. The Council has notified these organisations at regular points over the last two years of the intention to review the scheme, and that this could impact on any future funding.
- 11.3. In addition, it is proposed to implement the changes to the scheme over a longer period, to ensure organisations have sufficient notice of any changes in the funding they receive.
- 11.4. Therefore, during 2020/21 rent subsidy and rate relief will be payable under current arrangements.

11.5. If the policy is approved by Cabinet, the following timetable is planned.

Rental subsidy

10 February 2020	New rent subsidy scheme opens for applications
13 March 2020	Deadline for applications for rent subsidy
April 2020	Organisations notified of decisions regarding rent subsidy
1 April 2021	New rent subsidy payments begin

Discretionary rate relief

1 October 2020	New rate relief scheme opens for applications
31 October 2020	Deadline for applications for discretionary rate relief
March 2021	Organisations notified of decisions regarding discretionary rate relief (due to the valuation process)
1 April 2021	New rate relief payments begin

11.6. The transition from peppercorn rents to market rents would be implemented over time from April 2020: immediately for expired leases, and in other cases, as leases expire or break clauses allow.

11.7. Allocations of council community properties will be made under the new policy from 1 April 2020, starting with a review of expired leases that are holding over.

12. CONSULTATION

12.1 As mentioned at 3.2 above, the Council undertook engagement to inform the VCS Strategy that was adopted in March 2019, which in turn has informed the proposals within the draft policy.

12.2 In addition, consultation on the draft rent setting framework and provisions for allocating properties, rent subsidy and rate relief was undertaken between 9 October and 19 November. The consultation included an online survey and engagement event. The consultation was promoted on the Council's Get Involved web portal and via the VCS infrastructure organisations' regular communications channels to VCS organisations across Croydon.

12.3 21 representatives of VCS organisations and groups attended the engagement event, which was held on 1 November 2019. 63 VCS organisations responded to the online survey. Respondents to the survey included organisations that did not rent their premises from the Council (52%); did not receive rent subsidy (65%) and did not receive DRR (43%). Of those that did rent from the Council, 23% paid nil rent; and 68% did not share their premises with another VCS organisation.

12.4 Responses to the proposals were broadly positive across the board:

- **Overall policy objectives:** 67% agreed or strongly agreed with the policy objectives, and 24% neither agreed nor disagreed
- **Rent setting framework:** 51% agreed or strongly agreed with the proposed method for setting rents in council community properties, and 33% neither agreed nor disagreed
- **Rent subsidy:** 70% agreed with the proposed eligibility and assessment criteria for rent subsidy, with 24% neither agreeing nor disagreeing. 57% agreed or strongly agreed with the proposed grounds on which rent subsidy might be reduced or withdrawn, with 33% neither agreeing nor disagreeing
- **Renewal of lease:** 77% thought that the council should renew the lease if a tenant organisation still met the eligibility criteria at the end of the lease
- **Discretionary Rate Relief (DRR):** 57% agreed with the proposed criteria for determining eligibility, assessing priority and awarding DRR, and 28% neither agreed nor disagreed
- **Performance monitoring:** 67% agreed or strongly agreed with the proposed arrangements for performance monitoring and other arrangements, and 21% neither agreed nor disagreed
- **Implementation:** 64% agreed or strongly agreed with the proposed implementation arrangements, and 24% neither agreed nor disagreed.

12.5 A summary of the consultation responses is set out in Appendix 2.

13 PRE-DECISION SCRUTINY

13.1 The policy was considered by the Scrutiny Streets, Environment & Homes Sub-Committee on 17 December 2019 for pre-decision scrutiny. In reaching its recommendations, the sub-committee came to the following **Conclusions**:

1. It was not deemed appropriate for social enterprises and co-operatives to be

automatically excluded from submitting an application for rent subsidy.

2. The timeline for notification of award of discretionary business rate relief be amended to ensure that organisations were notified as early as possible of the decision made to enable alternative arrangements to be made ahead of the beginning of the financial year should they not be eligible for the rate relief.

13.2 The Sub-Committee resolved to **Recommend**:

1. That social enterprises and co-operatives should:
 - a) Be eligible to submit an application should they meet the criteria and their application be considered on its own merit.
 - b) Officers to discuss and formulate a plan as to how to assess the eligibility of these groups if there is to be a difference in application criteria to that of voluntary organisation.
2. That in order to reduce the length of time between submission of application and notification of decision, organisation be notified of the outcome of their application for discretionary rate relief no later than the January following submission. Except in a re-evaluation year where notification should be made in the March following submission of their application to ensure that a definite decision is provided in the first instance.

14 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 14.1 Current annual funding for rent subsidy (£276,000) and discretionary rate relief to the VCS (£157,000) will remain unchanged as a result of the policy. Additional income, obtained from charging market rents (instead of peppercorn rents) from 1 April 2021, would eventually amount to £46,000. This income would be allocated for paying rent subsidy to eligible VCS organisations renting council community properties.

14.2 **The effect of the decision**

There are no direct costs arising from the implementation of the policy.

14.3 **Risks**

There is a risk that any unsubsidised rent due is not paid if a tenant's financial management is poor. This is mitigated against by strong and close working relationships between the Council and funding recipients. The policy provides for requiring tenants to demonstrate that they are viable, competent at financial management and able to manage an asset and comply with the lease obligations. Where tenants are eligible for rent subsidy and DRR, these sums will be credited directly to the appropriate account.

14.4 Options

Transfer the extra rental income obtained from charging market rents (instead of peppercorn rents) in council community properties to the communities rent subsidy budget.

14.5 Future savings/efficiencies

The funding will be focussed more effectively on activities that support the Council's priority outcomes, as set out in the VCS Strategy.

Approved by Felicia Wright, Head of Finance

15. LEGAL CONSIDERATIONS

15.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that the proposed policy covers a number of different statutory regimes.

15.2 The Local Government Finance Act 1988 makes provision for local authorities to award 80% Mandatory relief to charities. Section 47 of the Local Government Finance Act 1988 allows a local authority to grant Discretionary relief if:

- a) all or part of the hereditament is occupied for the purposes of one or more institutions or other organisations:
 - i. none of which is established or conducted for profit and
 - ii. each of whose main objects are charitable or otherwise philanthropic or religious or concerned with education, social welfare, science, literature or the fine arts; or

b) the hereditament:

- i. is wholly or mainly used for purposes of recreation, and
- ii. all or part of it is occupied for the purpose of a club, society or other organisation not established or conducted for profit.

15.3 A local authority may in its discretion award up to 20% Discretionary relief to charitable organisations in receipt of 80% Mandatory rate relief. A local authority may also in its discretion award up to 100% of Discretionary relief to organisations not eligible for Mandatory relief.

15.4 In respect of Croydon specific discounts or rebates, the Localism Act 2011 amends Section 47 of the Local Government Finance Act 1988 to allow local authorities to grant Discretionary reliefs to any ratepayer, subject to the rules on State Aid.

15.5 State aid rules apply as a matter of course to any assistance or advantage given on a selective basis by a public authority (such as a Council or body through whom government funding is channelled) to any organisations that could potentially distort competition and trade in the EU. The rules will continue to apply even if/when the UK leaves the EU.

15.6 The definition of state aid is deliberately very broad because 'an advantage' can take many forms. It is anything which an undertaking (an organisation

engaged in economic activity) could not get on the open market. “Undertaking” in this context can include voluntary and non profit-making public or private bodies such as charities or voluntary sector bodies when they engage in activities which have commercial competitors. It includes self-employed/sole traders.

- 15.7 State aid specifically includes such things as grants, loans, tax breaks, rate relief, the use or sale of a state (or Council) asset for free or at less than market price (such as peppercorn rent) etc. Not all State Aid is unlawful as there are certain defined exemptions.
- 15.8 Consideration of State aid will form part of the assessment undertaken by the department in considering whether or not to grant aid via the proposed policy at Appendix 3 in respect of which they will seek specific advice as and when required.

Approved by Sandra Herbert, Head of Corporate and Litigation on behalf of the Director of Law and Governance & Deputy Monitoring Officer

16. HUMAN RESOURCES IMPACT

- 16.1 There are no direct Human Resources implications for Croydon Council staff arising from this report.

Approved by Sue Moorman, Director of Human Resources

17. EQUALITIES IMPACT

- 17.1 The Equality Analysis concluded that no major change was required. The Equality Analysis demonstrates that the policy is robust and that the evidence shows no potential for discrimination and that all opportunities to advance equality have been taken.
- 17.2 Having clear, written policies will increase transparency and ensure fairness. The policies create opportunities for relatively new groups to apply for and obtain community premises, get rent subsidy and DRR, when previously support was provided on a rolling basis to existing beneficiaries.
- 17.3 The policies focus premises related support on organisations that will contribute to the achievement of the priority outcomes in the Council’s VCS strategy (see Appendix 1). These priorities have been designed to enhance the Council’s ability to meet its Public Sector Duties, namely advancing equality of opportunity between people who belong to protected groups, eliminating unlawful discrimination, harassment and victimisation and fostering good relations between people who belong to protected characteristic groups and those who do not. The focus on the priority outcomes means that organisations that deliver services that benefit people with protected characteristics will receive premises related support.

- 17.4 The allocation of properties will take account of local need and community benefit. The policy for DRR prioritises smaller qualifying organisations. Enhanced priority will be given for rent subsidy to organisations with lower income and those that work in areas of greatest deprivation.
- 17.5 Policies encourage the sharing of premises, creating opportunities for smaller groups to access space in other organisations' premises for part time use or a small work station.

Approved by: Yvonne Okiyo, Equalities Manager

18. ENVIRONMENTAL IMPACT

- 18.1 There are no direct environmental sustainability impacts arising from this report.

19. CRIME AND DISORDER REDUCTION IMPACT

- 19.1 There are no direct impacts on crime and disorder reduction arising from the recommendations in this report.

20. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 20.1 The Council's approach to premises related subsidy and support to the VCS has lacked an integrated approach. There has been no formal adopted policy or procedure for allocating council community properties and setting the rents for such properties, and determining which organisations should benefit from Rent Subsidy and DRR.
- 20.2 This policy is designed to rectify this and gives effect to the pledges made in the VCS strategy relating to premises related support. It covers the allocation of council community properties, sets a framework for charging rents for those properties, and the allocation of rent subsidy and discretionary rate relief to voluntary and community organisations. It provides transparency on how support is allocated and offers equality of opportunity to organisations that have not received funding to date, focuses the council's assistance on organisations that support the priority outcomes in the council's VCS Strategy (adopted in March 2019) and have the greatest community impact and need, and spreads the benefit of funding as widely as possible.

21. OPTIONS CONSIDERED AND REJECTED

- 21.1 **No change**
No transparency in allocations, rent subsidy and discretionary rate relief allocated on a historic basis, with no opportunity for new organisations to apply for premises related support, support not focussed on council's priority outcomes, no clear mechanism to bring support to an end in the event of unsatisfactory performance.

21.2 Rent subsidy

- ***Open scheme immediately to organisations renting from private landlords:*** to ensure that there is the capacity to pay rent subsidy to all eligible existing VCS tenants of council community properties when market rents are introduced.

21.3 Discretionary Rate Relief

- ***Using same eligibility criteria as Rent Subsidy, with applicants not required to qualify for mandatory rate relief.*** Mandatory rate relief attracts government funding for 80% of the rate burden. If the Council had to cover 100% of a rate bill, it would be able to support fewer organisations with DRR.
- ***Direct DRR to organisations not qualifying for 80% mandatory relief.*** Some smaller organisations lack the resources to cover even part of a rate bill. DRR that tops up mandatory relief achieves 100% relief. Profit-making organisations are more able to afford business rates.
- ***Using organisations' turnover to rank applications*** would favour smaller organisations. This would apply to the whole organisation. The assessment would have to be alert to larger organisations setting up a subsidiary with a low turnover in order to benefit from this provision. However, this option would ignore the burden of rate bill and not encourage organisations to seek premises with a lower rateable value.

22. DATA PROTECTION IMPLICATIONS

22.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

No

The Director of Policy and Partnership comments that data obtained in relation to applications for council community properties, rent subsidy and discretionary rate relief will all relate to organisations, not individuals.

Approved by: Gavin Handford, Director of Policy and Partnership.

CONTACT OFFICER: John Montes, Senior Strategy Officer, ext 61613.

APPENDICES:

Appendix 1: Summary of Voluntary and Community Sector Strategy priorities

Appendix 2: Summary of consultation responses

Appendix 3: Draft Policy for allocating council community properties, setting rents and providing rent subsidy and discretionary rate relief to VCS organisations

Appendix 4: Equality Impact Analysis

BACKGROUND PAPERS: None

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VCS Strategy Priorities

- 1. People live long, healthy, happy and independent lives. We want people to be able to stay well and to manage well. Should they need support or services they will be closer to home.**
 - a. Visible, cohesive and resilient communities
 - b. Croydon becomes a more equal place
 - c. Healthy, happy and independent lives: are lived by as many as possible for as long as possible
 - d. Access to effective health services and care services when needed
- 2. Our young people thrive and reach their full potential**
 - a. Children and young people in Croydon and their families are safe, healthy and happy; young people aspire to be the best they can be.
 - b. Every child and young person can access high-quality education and youth facilities
 - c. Getting more young people involved in taking part in local democracy and in tackling the issues that matter most to them
- 3. Access to homes and prevention of homelessness: all have the opportunity to access a suitable home and avoid homelessness, with no one forced to sleep on the streets**
- 4. Everyone feels safer in their street, neighbourhood, home. We pledge to treat serious youth violence including knife crime as a public health issue**
 - a. Working in partnership to reduce crime; including serious youth violence, domestic abuse and sexual violence, and hate crime
 - b. Anti-social behaviour and environmental crime are reduced throughout the borough, through work with partners and local community involvement
- 5. Everybody has the opportunity to work and build their career**
 - a. More residents can develop their skills through apprenticeships, academic and technical courses and access employment opportunities
- 6. We value arts, culture, sports**
 - a. Croydon's cultural offer enhances our town and creates places where people want to live, work and visit
 - b. Good, affordable and accessible sports and leisure facilities enable people to be as active and healthy as they want to be
 - c. Our parks and open spaces are safe, pleasant, thriving places where everyone can exercise and have fun

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Consultation feedback: the Council response

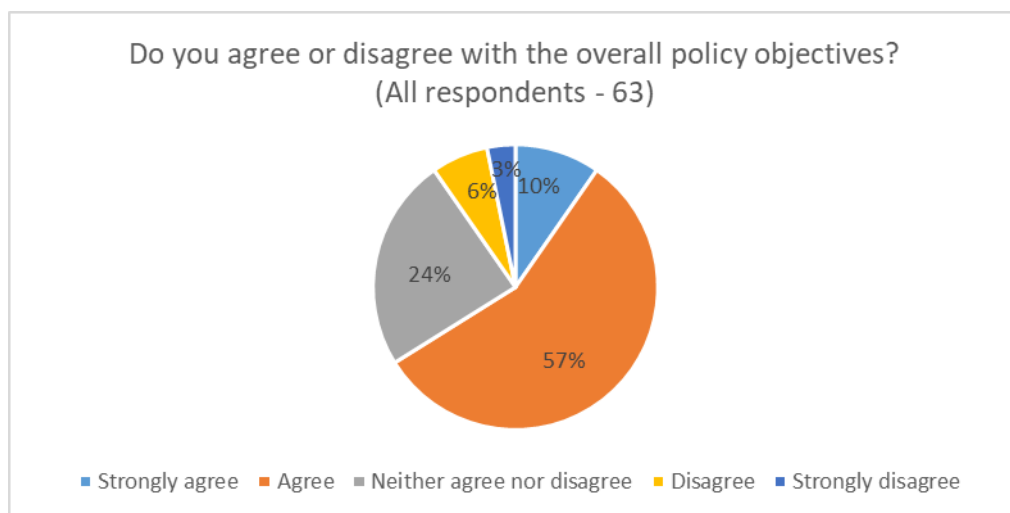
Consultation on a draft policy for allocating council community properties, setting rents, and awarding rent subsidy and discretionary rate relief to the voluntary and community sector

1. Overview

- 1.1. Consultation on the draft policy for properties, rent subsidy and rate relief was undertaken between 9 October and 19 November 2019. It included an online survey and engagement event. The consultation was promoted on the Council's Get Involved web portal and via the VCS infrastructure organisations regular communications channels to VCS organisations across Croydon.
- 1.2. 21 representatives of VCS organisations and groups attended the engagement event, which was held on 1 November 2019. 63 VCS organisations responded to the online survey. Not all respondents answered every question. Respondents to the survey included organisations that did not rent their premises from the Council (52%); did not receive rent subsidy (65%) did not receive discretionary rate relief (DRR) (43%). Of those that did rent from the Council, 23% paid nil rent; and 68% did not share their premises with another VCS organisation. All responses have been analysed and given full consideration in the preparation of the final policy. We are grateful to everyone who took the time to respond.
- 1.3. This document provides a summary of the consultation responses received, and views expressed at the engagement event. It does not attempt to capture every point made. This document sets out the changes the Council has made in response to the points raised in the consultation and where the council has not made changes, the reasons are explained.

2. Overall objective of proposed policies

Question 1: Do you agree or disagree with the overall policy objectives?



Question 2: Should there be any other objectives?

Question 2 response

There were 32 responses. Points raised include:

- A wish for clarity and transparency regarding Council properties available to the VCS.
- Some VCS organisations renting privately said they had immediate needs and would not be able to wait until 2024/25 for rent subsidy.
- Need to improve health and safety in Council community properties
- VCS organisations and non-VCS organisations sharing Council and private properties as a solution.
- The need to be based in 'areas of greatest deprivation' to qualify was seen as unfair, as some organisations help those from these areas but are not based in the areas themselves. Being able to 'show that people who use their premises live in areas of deprivation' was fairer.

The Council response

The Council intends to limit phase 1 (2021/24) of the rent subsidy scheme to organisations occupying premises owned or leased by the Council in order to ensure that there is sufficient income from market rents to enable eligible VCS organisations renting council properties to receive rent subsidy; some of them may be applying for it for the first time. The Council does not have additional resources to add to the scheme. The overall effect of the policy must therefore be cost neutral. The operation of the scheme in Phase 1 will be reviewed in 2023 before deciding whether to extend it to organisations renting privately.

Giving some weighting to organisations based in an area of deprivation is consistent with the Council's locality approach to service delivery. When considering issues to

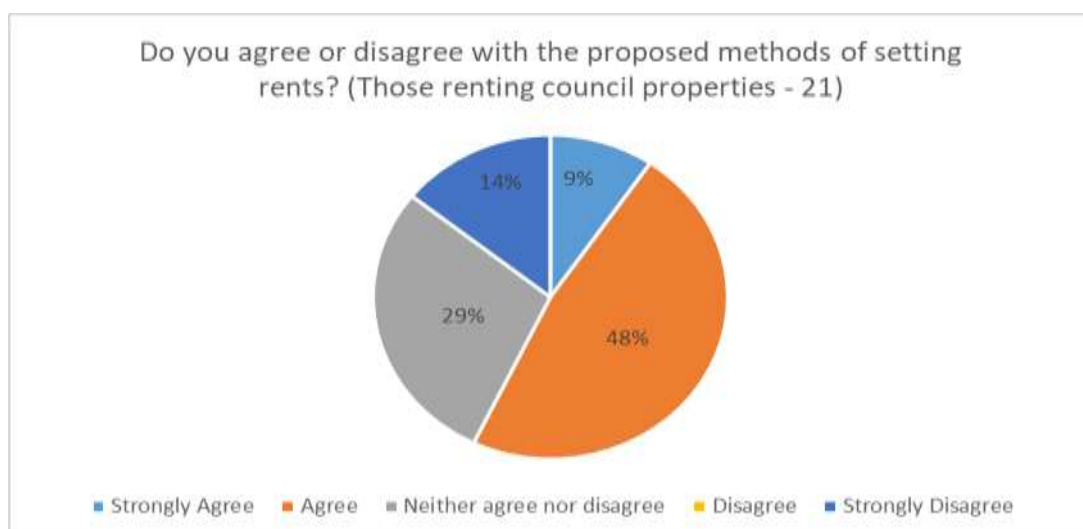
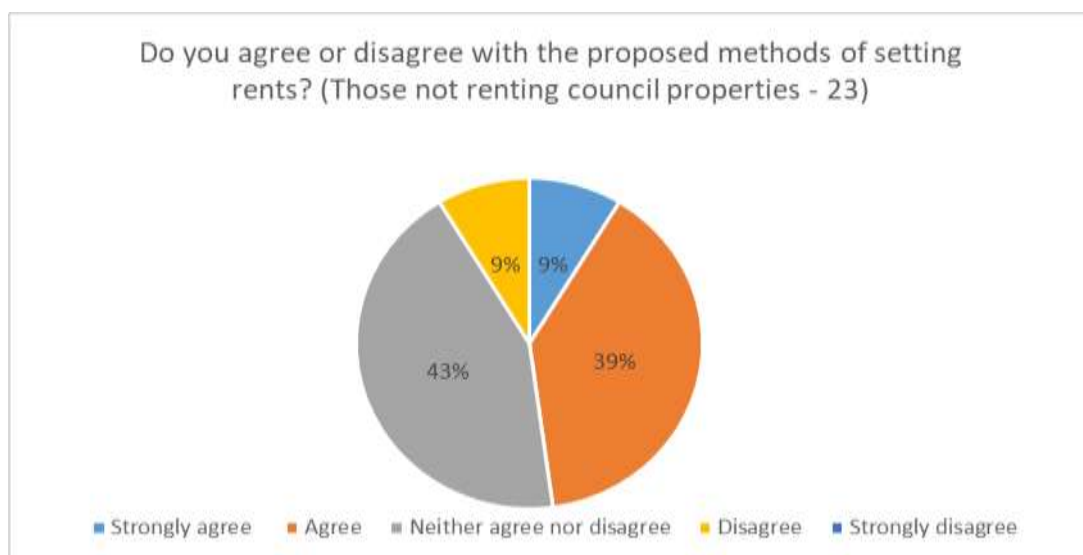
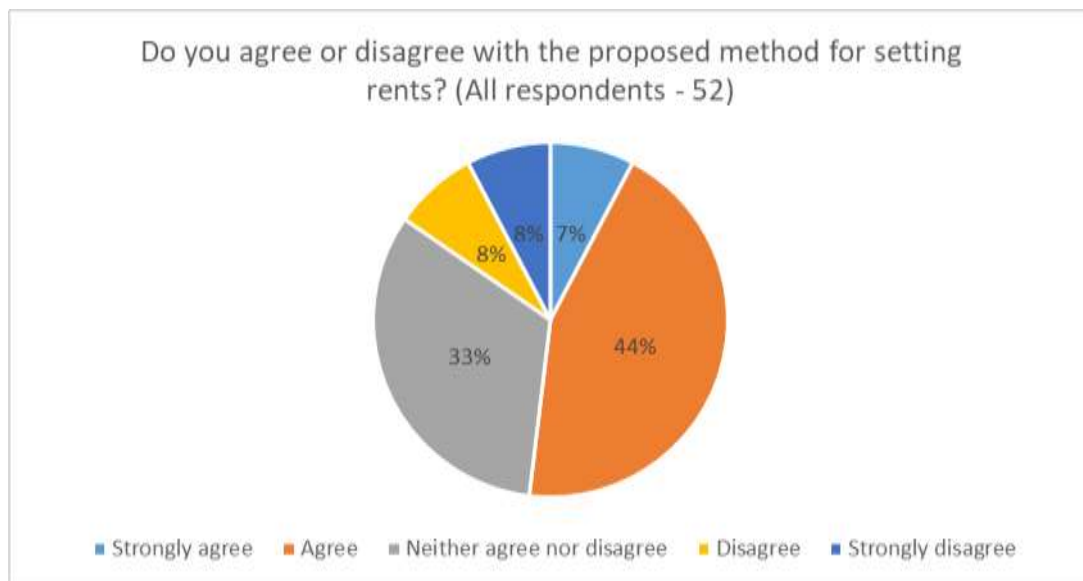
be addressed by the VCS Strategy on 11 February 2019, the Scrutiny and Overview Committee observed that some localities were underrepresented by voluntary organisations compared to others.

AMENDMENT TO POLICY

The policy has been amended to reduce the weighting given to organisations based in areas of deprivation, awarding 5 points for multiple deprivation only, a modest degree of extra priority for organisations based in areas of greatest deprivation.

3. Rent charging framework for Council community properties

Question 3: Do you agree or disagree with the proposed method for setting rents?



Respondents were broadly in favour of the proposed method of setting the rent. Not all respondents to this question indicated whether they rented a council property. The proportion of respondents who agreed with the rent setting framework was higher among those renting from the Council (57%) than among those who did not (48%). The proportion of respondents who neither agreed nor disagreed with the framework was higher among those not renting from the Council (43%) than among those who did (29%).

Question 4: Do you have any other comments in respect of setting rents?

Question 4 response.

There were 33 responses. Points raised included:

- There was concern that the loss of rent subsidy or DRR would shift organisations' resources away from service delivery and drain their reserves. It would also make their bids for other grants less competitive as they would have to include housing costs, making organisations less likely to leverage external funding and more likely to shift costs onto other Council programmes. It was noted that the Council's premises related support for local groups is a major factor in their fundraising success.
- Some respondents questioned the need for the policy to change.
- Some wondered how much higher the new rents would be
- VCS organisations that have invested capital in the fit out of premises should benefit from an adequate and lengthy lease or a defined rent free period to enable them to recover financially
- The need to exempt organisations from service charges as well as rent subsidy/DRR.
- If the market rent reflected potential usage, including potential development, this could open up community spaces to risks of unviability and potential development.
- Basing the rent on a geographical location commanding higher rental values may result in a lack of community activity in central Croydon run by those with lower incomes, as those spaces became unviable. It would be preferable to let such properties at a peppercorn or to focus rent subsidy on council properties to ensure the availability of rent subsidy to maintain the viability of such properties.
- The Council needed to be strategic in targeting support at groups making best use of premises, whether subsidised before or not. Without rent subsidy rents in community hubs would have to increase to cover management and maintenance costs.
- VSC organisations should be allowed to hire affordable space to other community or commercial groups offering a community activity or service.
- Support for encouraging the sharing of premises, as there were insufficient properties for groups to rent, such as small or shared spaces for smaller

organisations needing a base for equipment and an office space for one or two days a week.

The Council response

AMENDMENT TO POLICY

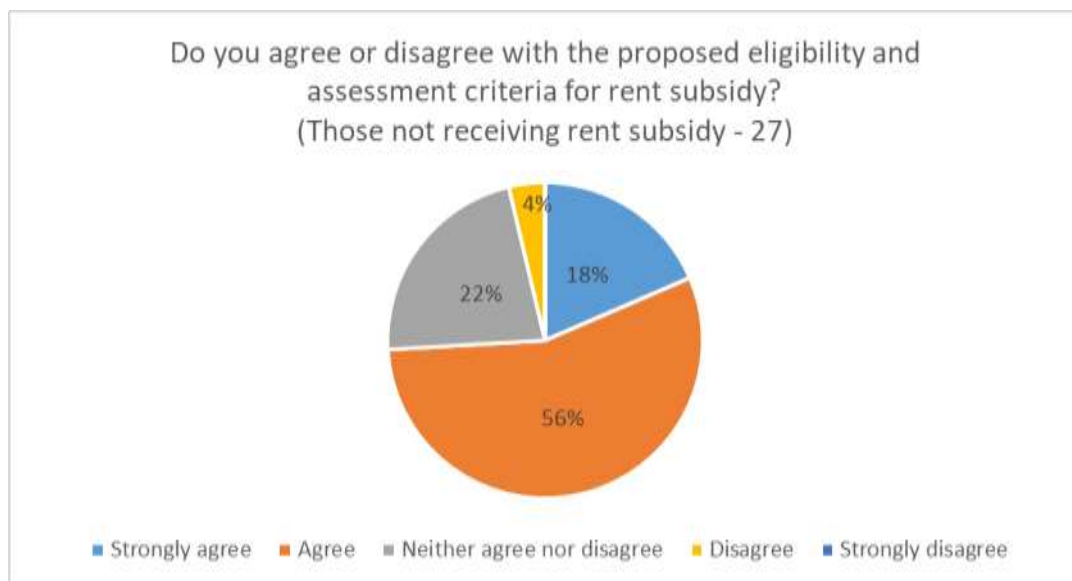
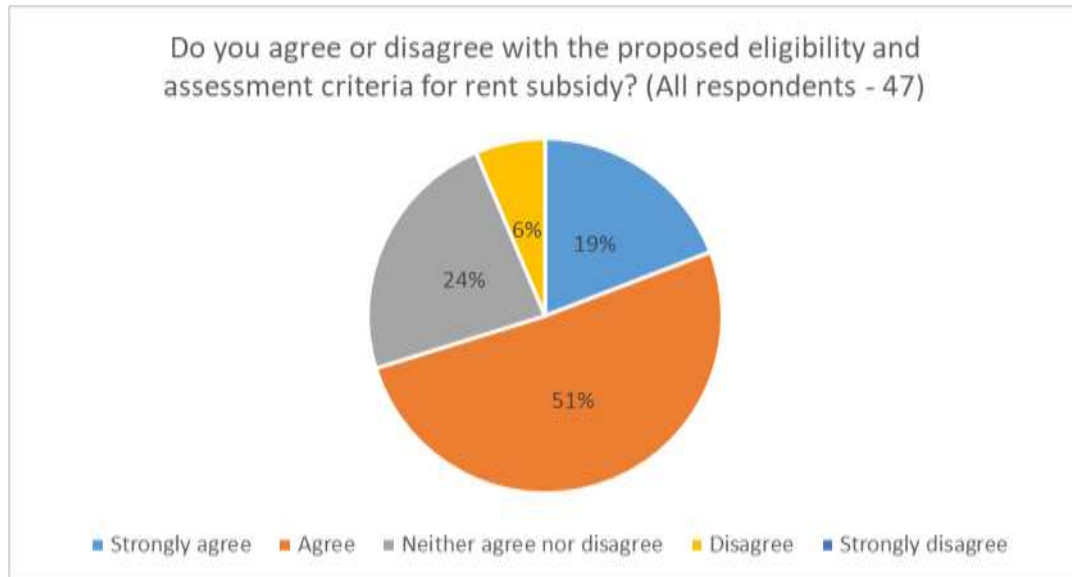
The wording of the policy was changed to make it clear that market rents would not reflect potential development and that capital investment in properties by lessees would be recognised through a rent free period.

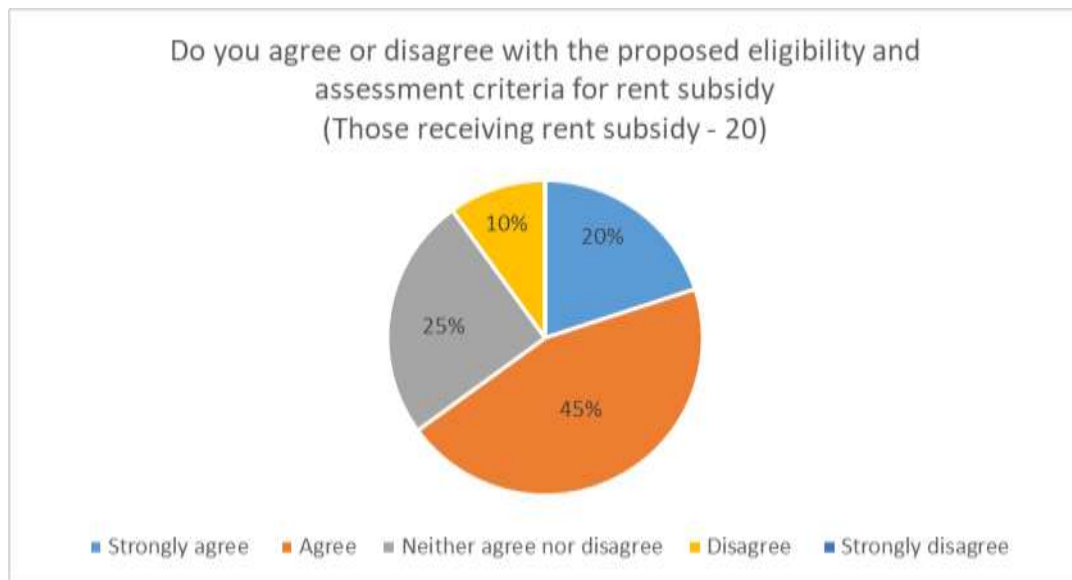
Most council community properties are not located in areas of highest rental value in central Croydon. Moving from the use of peppercorn to market rents is not expected to have such an impact on viability as rent subsidy would target support at organisations supporting the priority outcomes in the Council's VCS strategy. Rent subsidy will be focussed on council properties for three years and the policy will be reviewed before any extension to privately owned properties.

The policy allows VCS organisations to sublet to other VCS organisations approved by the council at a charge that enables them to recover reasonable expenses of doing so. This permission will not extend to commercial organisations as the aim of the policy is to increase the availability of space to VCS organisations and groups. The sharing of premises is also encouraged. The Council plans to develop a web-based project to share information about VCS organisations and groups seeking space and potential providers of space.

4. Rent subsidy

Question 5: Do you agree or disagree with the proposed eligibility and assessment criteria for rent subsidy?





Whether they received rent subsidy or not, the majority of respondents supported the criteria. Only three disagreed.

Question 6: Do you agree with the proposed eligibility and assessment criteria for rent subsidy?

Question 6 response.

There were 33 responses. Points raised included:

- A welcome for rewarding organisations' willingness to offer space to smaller groups and support for a framework that fosters collaboration among groups, with a call for a council register of spare spaces that small groups can use, not just premises to let.
- Questioning whether it was appropriate to ask organisations to share if they needed to ensure confidentiality to their beneficiaries
- Sharing properties may lead to greater administrative costs.
- A request to clarify whether 'financial turnover' refers to 'total income' or 'total expenditure'
- Some felt turnover should not trump community need, or the value and specialisation that each charity brings to the borough.
- Suggestion to use net current assets (which excludes debtors and creditors) rather than 'reserves'. Some felt that organisations should not be penalised for building up reserves, nor should it be assumed that organisations with large turnovers would necessarily have the resources for fundraising. They should be given contacts for the infrastructure organisations.
- Some felt that it was excessive to require 85% of users to be Croydon residents, especially for organisations based near the borough boundary; others felt it was right to give priority to organisations based in Croydon.

The Council response

AMENDMENT TO POLICY

The policy has been amended, with the percentage of users that should be Croydon residents lowered from 85% to 75%. 'Turnover' is now defined in the policy as 'gross annual income'.

The points system gives appropriate weight (40 points) to critical services which would include some specialist services, compared with low financial turnover (5 or 10 points) or sharing (5 points). Given the limited funding available, the Council considers that it is reasonable to expect organisations with reserves of more than two years' operating costs to pay their rent. Advice will be available from the Council and infrastructure organisations on fundraising.

The Council plans to develop a web-based project to share information about VCS organisations and groups seeking space and potential providers of space. The policy does not penalise organisations if the Council accepts that they cannot share their premises, and it allows a charge to recover the reasonable expenses of subletting or sharing.

Question 7: On what grounds should an organisation receive 100% rent subsidy?

Question 7 response.

There were 41 responses. Points raised included:

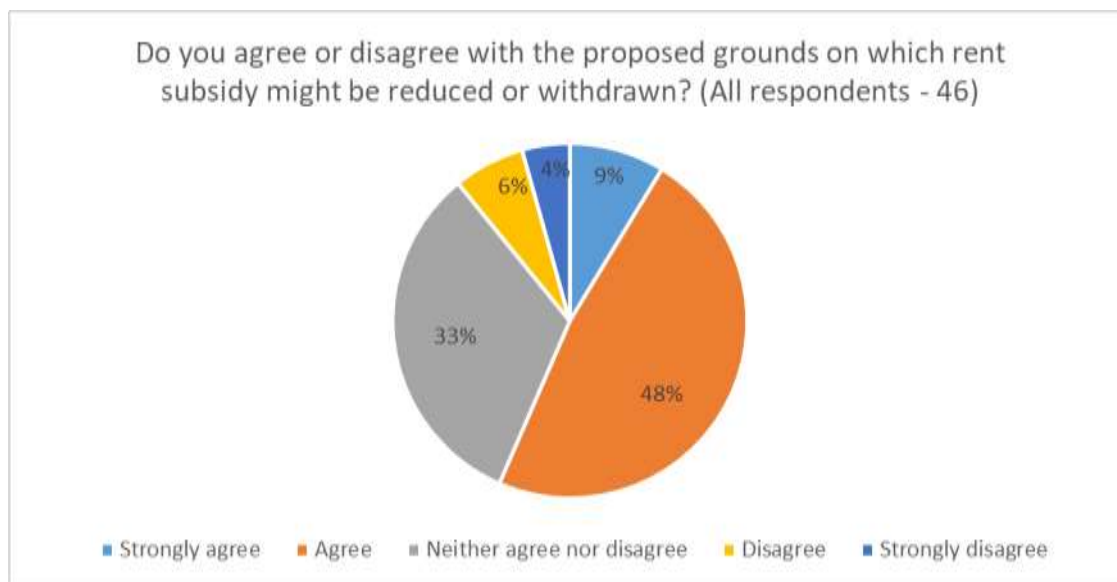
- Organisations with no income, with little capacity to earn income to meet its rent, and not-for-profit.
- The lack of subsidy would reduce the income available to deliver services.
- To retain a vital service in the borough
- The number of residents benefitting from the organisation.
- The organisation is open 5-days a week.
- It meets the strategic needs of the Council.
- It provides a hub/community space for other local services to use
- Has a low turnover, defined as less than £5,000 or £20,000 pa (£50,000 as a medium category was too high) and have little or no reserves.
- The organisation has never received rent subsidy before.
- Received on the basis of high performance and achievement.
- The organisation does not receive grants from the Council.
- The organisation has a robust business plan ensuring its sustainability.

The Council response

The policy as drafted allocates subsidy equivalent to 100% of the rent. Most of the suggestions made are reflected in the policy in terms of the eligibility criteria or priority awarded. The policy offers an opportunity for organisations that have not

received rent subsidy before, although this would not of itself be a reason to give priority.

Question 8: Do you agree with the proposed grounds on which rent subsidy might be reduced or withdrawn?



Question 9: Do you have any other comments on our proposals for rent subsidy?

Question 9 response

There were 26 responses. Points raised included:

- Allocating properties for a limited term may not provide organisations with the stability they need. For most organisations, a long lease for five or more years is necessary to achieve long-term funding options across different sectors.
- Adequate notice should be given when rent subsidy is reduced, for instance where Council priority outcomes change. The reduction could be phased over a period of time.
- Non-VCS organisations should be taken into account when assessing usage.
- Make sure information is transparent and correct.
- A request for help from the Council for organisations under-utilising their premises to find groups with which to share
- Concerns regarding the exclusion of organisations wholly or mainly subletting the premises from rent subsidy and a request that this be clarified.

The Council response

AMENDMENT TO POLICY

The policy has been amended to allow organisations wholly or mainly subletting the premises to claim rent subsidy. However, the Council will have to agree the rent charged to the subtenant, which should be no more than a reasonable charge to allow for the recovery of costs. The policy has been amended to state that in the event of a decision to reduce rent subsidy,

six months' notice will be given. In the event of a decision to withdraw rent subsidy, a letter will give the reasons for this measure.

The Council will assist organisations to find other VCS groups to share with. Commercial organisations are not taken into account, as the policy is intended to increase the availability of premises for the VCS. The length of a lease awarded by the Council will depend on the property concerned, but five years would not be an unusual period.

5. Allocation of Council community properties

Question 10: How should the council prioritise allocations of premises?

Question 10 response

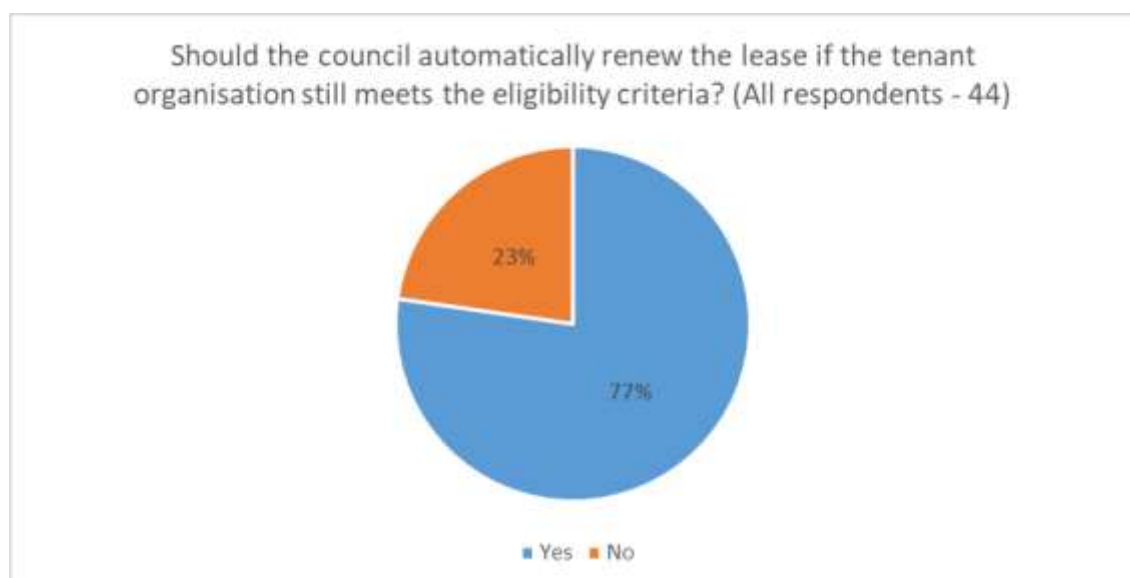
There were 38 responses. Points raised included:

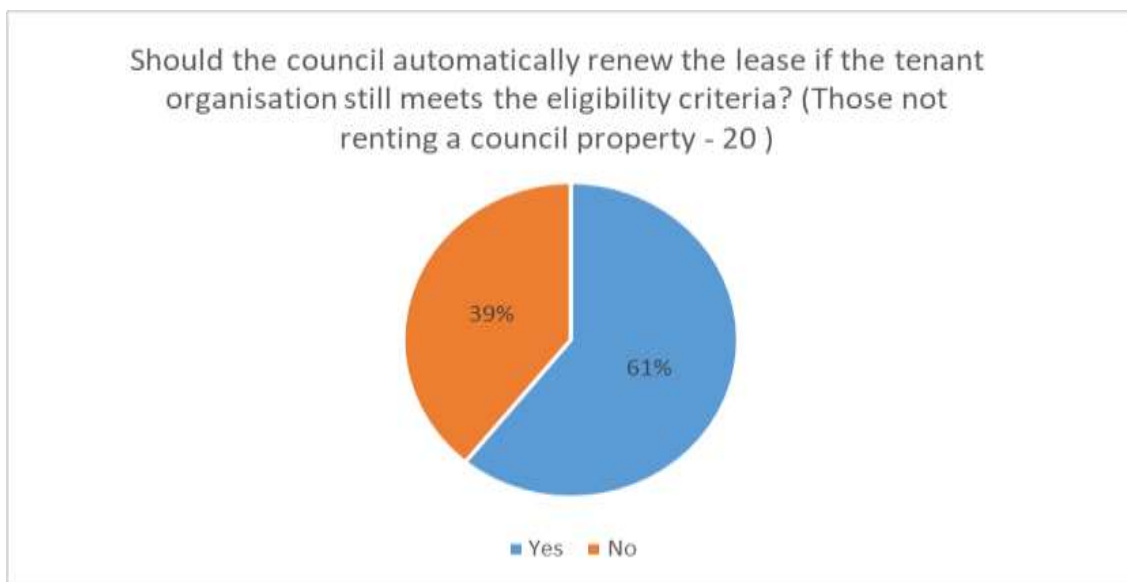
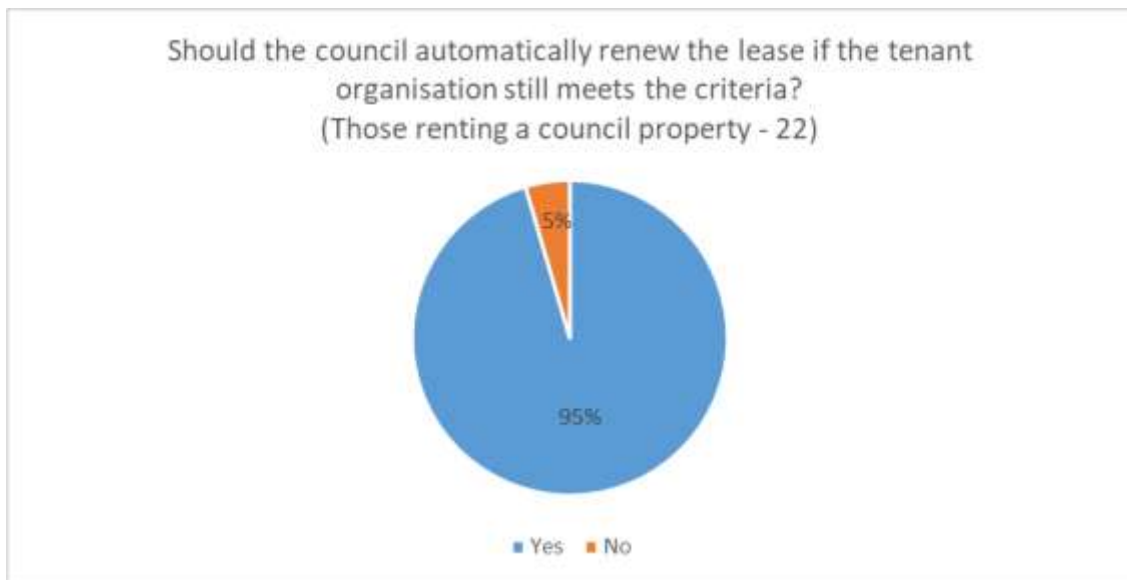
- Support for allocating premises to organisations that support VCS strategy priority outcomes and for considering the needs in the area where the premises are located and the client group(s) that organisations would serve.
- Consideration should be given to organisations that provide business and infrastructure support and space for VCS organisations and businesses.
- The need of the organisation, the priorities that they address and their track record in making a difference to their community should be considered.
- The application process needs to be improved and made more transparent and connected with the stated long-term objectives of the Council and wishes of local people.
- The Council should prepare a list of premises.

The Council response

The policy criteria include support for priority outcomes, the local need for the proposed service and the needs of the organisation as well as its capability with regard to financial and asset management. This policy will make the application process more transparent. The Council will prepare a list of its current community premises and their occupants.

Question 11: What should happen when an existing lease expires? Should the Council automatically renew the lease if the tenant organisation still meets the eligibility criteria?





Respondents overwhelmingly supported the renewal of the lease if the tenant still met the eligibility criteria. Among respondents renting from the Council, this support neared unanimity. Two respondents did not indicate whether they rented from the Council.

Question 12: Under what circumstances should the property be offered to another organisation?

Question 12 response

There were 12 responses. Points raised included:

- Due diligence checks should be taken out to assess the impact and sustainability of the organisation.
- The lease should be renewed if the organisation still fulfils the eligibility criteria, adheres to the priority outcomes and has made progress in achieving its aims.
- The property should be offered to another organisation:

- If the organisation does not meet eligibility requirements.
- If there is no longer a local need for the service.
- If the space is not used regularly or for community benefit
- If there is evidence that an organisation is no longer carrying out the work it was supposed to do, or cannot manage the property or pay the rent on time, or is using it incorrectly in breach of the lease
- If another organisation has a greater need for the premises.
- If they no longer require assistance as they are exceeding their goals.
- If the Council decides not to renew a lease it should give sufficient notice and seek to provide assistance to locate alternative premises.

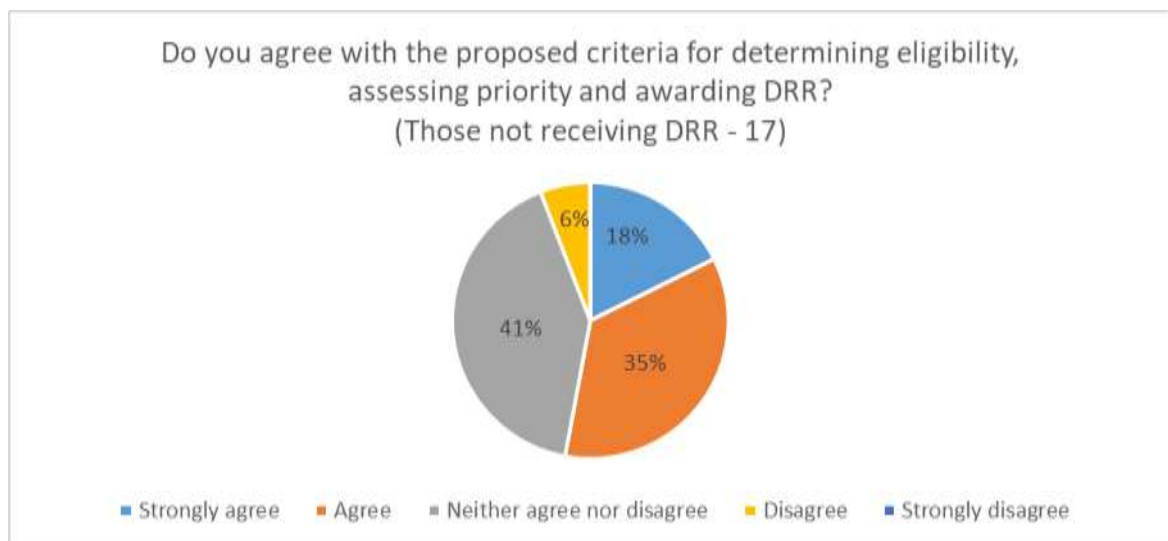
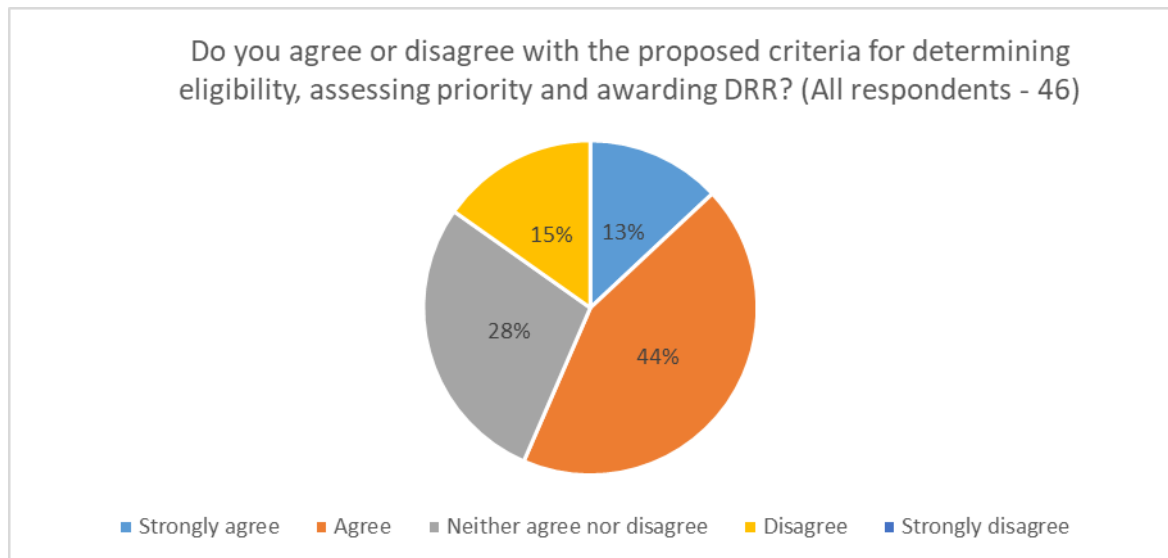
The Council response

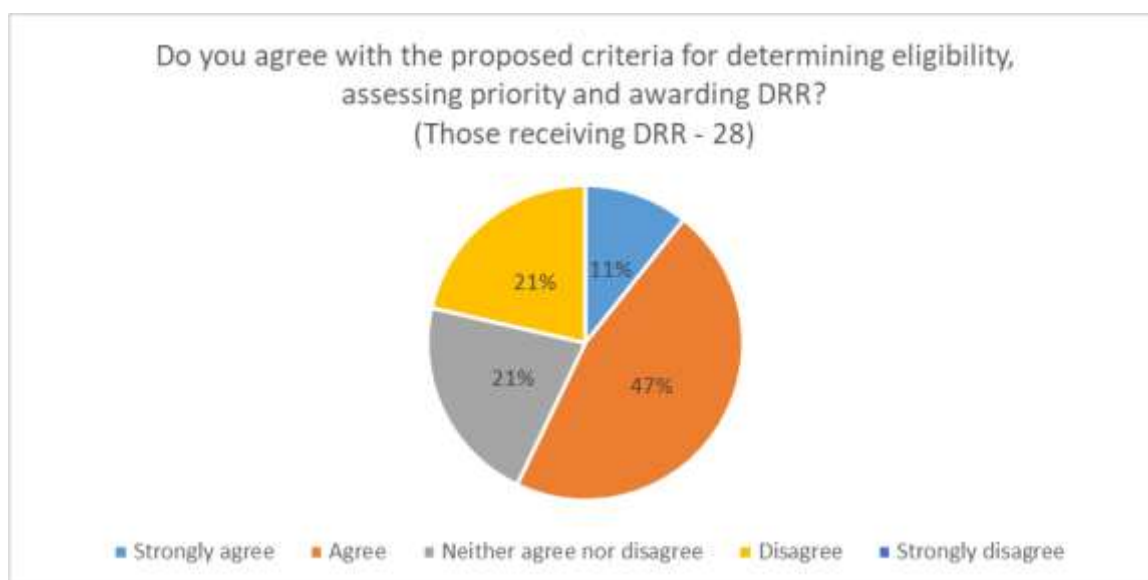
AMENDMENT TO POLICY

The policy has been amended to set out more clearly the criteria to be used in deciding whether to renew the lease, namely whether the priorities against which eligibility was assessed at the time the property was allocated are still relevant, the organisation's performance, compliance with the lease and regular use of the property for purposes agreed with the Council as well as the Council's own needs and the community's needs. The policy has also been amended to provide that grant six months' notice will be given to the occupier if the Council decides not to renew the lease.

6. Discretionary Rate Relief (DRR)

Question 13: Do you agree with the proposed criteria for determining eligibility, assessing priority and awarding DRR?





Respondents were broadly in favour of the proposed criteria for awarding DRR, whether they received it or not, and none strongly disagreed. One respondent did not indicate whether they received DRR. The proportion of respondents who disagreed with the criteria was higher among those who received DRR (21%) than among those who did not (6%). The proportion of respondents who neither agreed nor disagreed with the criteria was higher among those who did not receive DRR (41%) than among those who did (21%).

Question 14: Please give reasons for your answer

Question 14 response

There were 30 responses. Points raised included:

- The proposals were a fair and transparent system that would allow small concerns to thrive. DRR was seen as a lifeline to small start-ups and organisations struggling with funding.
- Some respondents were opposed to priority being given to organisations occupying premises with lower rateable values, though their reasons varied:
 - Payment of DRR to more small organisations should not be at the expense of larger ones. The criteria should be merit and performance.
 - Larger organisations would not necessarily have the resources to bear the rating costs if they were unsuccessful in their application for DRR
 - Organisations should not be penalised for requiring large premises to carry out the services they provide
 - Discouraging organisations from using properties with a higher rateable value might prohibit community activity in higher value areas
 - A larger organisation subletting rooms to smaller organisations would be compelled to pass the cost on and it was doubtful that those tenant organisations would be able to meet the increase in charges.
- Organisations should be encouraged to get the 80% Government subsidy (through mandatory rate relief) where possible.

- Some respondents felt that awards should be made for three to five years. This was either for reasons of stability, to avoid uncertainty or to avoid excessive bureaucracy. Organisations should not have to submit full supporting documentation each year with their applications.
- Several respondents said they didn't understand DRR and asked for staff to answer questions and help them understand what they would have to pay if their application failed.

The Council response

The aim of the DRR policy is to support those smaller organisations that are less able to meet the business rate burden. As DRR is a lesser sum than rent subsidy, annual applications will be required to give new and smaller organisations the opportunity to receive this support sooner than a three year cycle would allow. However, to reduce the burden on organisations, the Council will develop a renewal form that does not require organisations to resubmit supporting documentation every year. The Communities Team provide support and guidance on accessing funding opportunities generally and can answer questions about DRR. The operation of the policy and outcomes will be reviewed in 2023.

Question 15: If your organisation does not currently receive mandatory 80% relief from business rates, what is preventing you from applying for it?

Question 15 response

There were 32 responses. Points raised included:

- Several respondents didn't know that such rate relief was available or did not know how to apply for it.
- Others did not require it as they had no fixed premises or operated within another organisation's premises such as a community centre.

The Council response

AMENDMENT TO POLICY

The policy has been amended to include information on how to apply for mandatory rate relief and information on other rate relief schemes.

Question 16: Do you have any other comments about our proposals for DRR?

Question 16 response

There were 24 responses. Points raised included:

- Smaller charities that have few reserves need to be given priority as they cannot be supported by loans or grants from national bodies.
- An organisation with multiple properties questioned why it should be put at a disadvantage (through the aggregation of applications); rather, each property should be assessed for DRR on its merits.

- Timing of DRR (applications in October, with results January 31st) was misaligned with rent subsidy (applications in February-March, with results in April); this might mean that an organisation only found out later that its premises was unaffordable.

The Council response

AMENDMENT TO POLICY

The policy has been amended so that applications for multiple properties are not aggregated and each application is assessed separately.

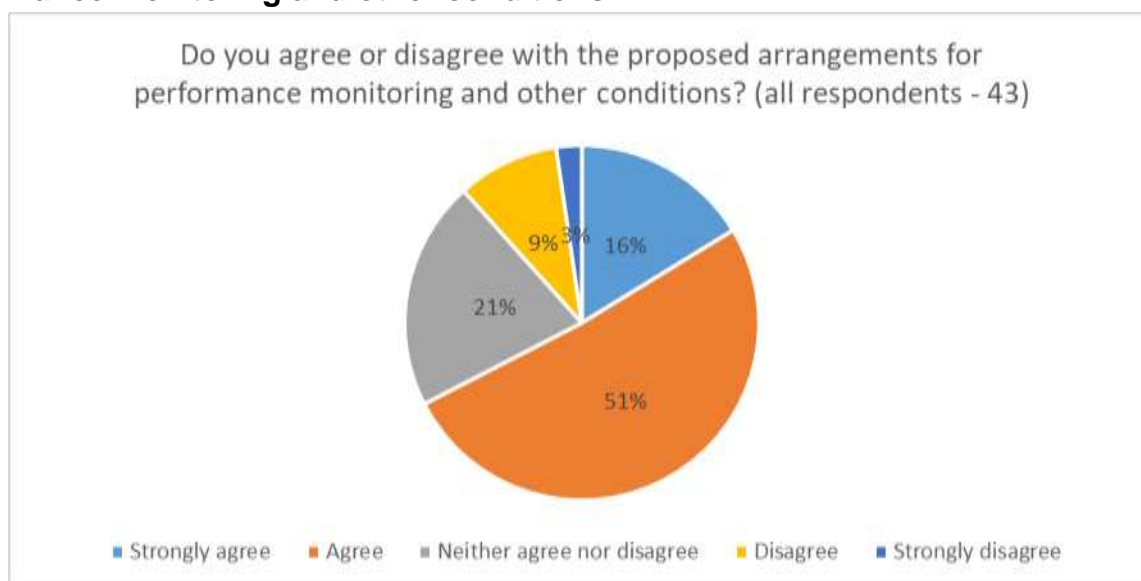
It has also been amended to state that decisions will be given in March for DRR for years when a revaluation of rateable values takes place. In non-valuation years, subject to administrative arrangements, the Council will calculate the DRR amount on the basis of the old year's business rate charge and issue a decision in January. It is likely that the new business rate charge will subject to an increase for inflation. The VCS organisation would therefore have to pay the difference between the DRR awarded (20% of the old year's business rate charge) and the new rate charge and would receive a bill asking for the difference in April.

Smaller charities with lower reserves will tend to be in properties with lower rateable values and will therefore receive priority under the new policy. The impossibility of providing an undertaking to cover DRR in advance (given that the Council is notified of the business rate multiplier in February each year and revaluations occur every three years) should not frustrate the Council's wish to provide 11 months' notice of its decisions on rent subsidy.

The Government has decided that revaluations will take place every three years. The next is due in 2021. Revaluation is the review of the rateable values of all business and other non-domestic property in England at a particular point in time. In a year when there is a revaluation there may be significant changes in the business rate charge for some properties. It will therefore not be possible to make a decision on DRR before March in valuation years. In non-valuation years, subject to administrative arrangements, the Council will calculate the DRR amount on the basis of the old year's business rate charge and issue a decision in January, as explained above, in order to give organisations a decision sooner.

7. Performance monitoring and other conditions

Question 17: Do you agree or disagree with the proposed arrangements for performance monitoring and other conditions?



Question 18: Do you have any other comments on proposed arrangements for performance monitoring and other conditions?

Question 18 response

There were 25 responses. Points raised included:

- While it was recognised that VCS organisations should be accountable for the public funding they received, there was concern that the application process and monitoring system should not be onerous for small organisations, or they would be deterred from applying for support.
- Monitoring should not duplicate the performance information requested by the Council in relation to other programmes.

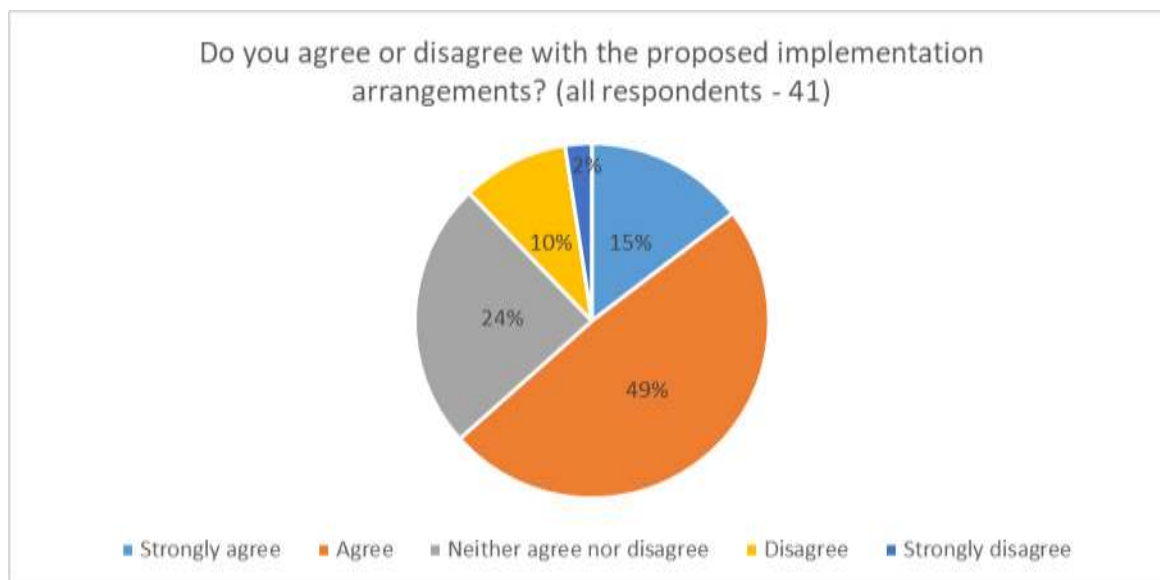
The Council response

AMENDMENT TO POLICY

The Council recognises the need to avoid unnecessary bureaucracy. The policy has been amended to state that it will align monitoring arrangements for rent subsidy and discretionary rate relief and where possible with grant performance monitoring.

8. Implementation

Question 19: Do you agree or disagree with the proposed implementation arrangements?



Question 20: Do you have any other comments about the proposed implementation arrangements?

Question 20 response

There were 23 responses. Points raised included:

- Applicants should be able to prove their capability through impact reports, accounts or similar governing documents.
- Concerns regarding the timing of rent subsidy and DRR were reiterated.
- More clarity was needed regarding deadlines and timings
- Stable council staffing would be required to enable consistency and transparency in implementing the policy.

The Council's response

AMENDMENT TO POLICY

The policy has been amended to provide a more detailed implementation timetable.

As mentioned in response to question 16 above, the impossibility of providing undertakings to cover DRR in advance (given that revaluations occur every three years) should not frustrate the Council's wish to provide 11 months' notice of its decisions on rent subsidy.

Main points raised at the VCS Consultation Event, 1 November 2019

Rent charging framework

1. Will the Council visit properties to measure the rooms?

The Council response

The Council should already have this information in most cases. Officers will ensure that the rates to be charged by square-foot are sense-checked. If the Council increases the income raised from rents for community properties it will be able to support more VCS organisations. Some VCS organisations may end up paying more, whilst some may pay less. VCS organisations may receive business rates relief alongside rent subsidy.

2. Is the Council able to influence how much schools charge to hire out their halls and get them to lower the hire fee?

The Council response

No, the Council has no control over school hire charges. Schools often charge a high fee as they need to pay cleaners and caretakers overtime, which significantly increases costs.

Allocation of properties

3. A request for the Council to set up a site for the demand for and availability of community space and act as brokerage facility

The Council response

The Council will seek to develop a web-based system to put VCS organisations and groups that have available space(s) within their premises in touch with other VCS organisations and groups that are looking for premises or space.

4. Networking opportunities are needed to allow spaces to be shared between VCS organisations.

The Council response

The Council recognises the benefits of holding networking opportunities for VCS organisations.

5. A request for a full list of all council community properties to be published on the council website, with lease expiry dates and for any available the type of terms under which they would be available e.g. rent band, term

The Council response

The Council will publish on its website a list of council community properties and their current occupiers. It should be noted that there are usually very good reasons why Council buildings are not in use; for example, structural issues.

6. **A request for available commercial space to be included in the list** as organisations such as Start Up Croydon would find this helpful and may be able to offer financial support – these would be outside of charity provisions and would not attract any subsidies from Council

The Council response

The Council will publish a list of vacant commercial spaces that it owns.

7. **A standard simplified lease was requested and clarity on what Council would be responsible for**

The Council response

The Council will develop a standard simplified lease with clarity on what the Council would be responsible for, including external repairs and statutory tests.

Rent subsidy

8. **Clarity sought on what qualifies as a VCS organisation**, e.g. non-profit organisations and social enterprises, under the eligibility criteria for rent subsidy.

The Council response

AMENDMENT TO POLICY

To be eligible for rent subsidy an organisation should be community-led, but the policy has been amended so that co-operatives and social enterprises will also be eligible.

9. **How will the Council score organisations that may only appear open to public a few days a week but are actually operational as offices for the remainder** when assessing applicants' ability to share accommodation or generate income

The Council response

The Council's criterion is about the time that the building is used for community benefit, its opening hours, so this is covered and understood

10. **Deprivation criterion:** Some VCS organisations felt penalised for not receiving points relating to tackling deprivation because they were not based in an area of deprivation.

The Council response

AMENDMENT TO POLICY

The policy has been amended to reduce the weighting given to organisations based in areas of deprivation, awarding 5 points for multiple deprivation only, a modest degree of extra priority for organisations based in areas of greatest deprivation.

Nevertheless, giving some, albeit reduced, weighting to organisations based in an area of deprivation is consistent with the Council's locality approach to service delivery. When considering issues to be addressed by the VCS Strategy on 11 February 2019, the Scrutiny and Overview Committee observed that some localities were underrepresented by voluntary organisations compared to others.

11. **Concern was expressed about the ability to share a property if it was not appropriate for specific groups and so could not cater for all protected groups.**

The Council response

The Council is aware that some organisations use their premises every day despite only being open to the public on certain days. The aim of the policy is to encourage premises to be shared.

With regard to concerns expressed around maintaining the confidentiality of clients if premises are shared with other organisations, the Council does not think that this would necessarily arise, but would discuss individual cases with the organisations concerned.

12. **Clarity was sought about how income received from hiring premises would impact on assessments for rent subsidy.**

The Council response

AMENDMENT TO POLICY

The policy has been amended to allow organisations wholly or mainly subletting the premises to make a reasonable charge to allow for the recovery of the costs of subletting or sharing, without it affecting any rent subsidy received. Rent subsidy may, however, be reduced if the Council considers that an excessive charge is being made.

The Council needs to ensure that the rates charged by VCS to those hiring their Council buildings are consistent across the borough and maximise the use of this

valuable space. It would not want to have a VCS organisation profiting from a Council building through excessive charges.

13. What will be the policy on VCS organisations letting out the space commercially? Will this be penalised?

The Council response

Our policy priority is to increase the availability of premises for the VCS. Subject to the written approval of the Council, organisations will be allowed to hire or sublet under-used parts of their premises to a VCS organisation that provides a community benefit to Croydon. Where an organisation wholly or mainly sublets the premises to other organisations, the property may be eligible for rent subsidy on condition that the subtenants are VCS organisations approved by the Council and the amount paid by the subtenant is no more than a reasonable charge to cover the tenant's costs of managing and running the building.

Discretionary rate relief

14. It was questioned why the policy offers Discretionary Rate Relief (DRR) to organisations that already receive 80% mandatory rate relief? Why not focus on organisations that don't get anything or offer them a lower percentage?

15. A request was made for wider guidance on business rate relief schemes that may be available outside of charitable relief, such as small business rate relief and exemptions for places of worship.

The Council response to 14 and 15

AMENDMENT TO POLICY

The policy has been amended to state that to be eligible for discretionary rate relief organisations may be community-led, a co-operative or a social enterprise.

Discretionary rate relief will be paid at 20% of the business rate charge.

Information has been added to the policy on other business rate relief schemes, including how to apply for mandatory relief.

Some small VCS organisations lack the means to pay any business rates at all, so it is important to be able to offer 20% top-up discretionary rate relief to organisations that already receive 80% mandatory rate relief.

Because the budget available is small compared to the demand for assistance, the Council considers it important to encourage organisations seeking business rates relief to apply for 80% mandatory rate relief if they qualify, as this is funded

by central government. While we respect an organisation's choice not to register as a charity, the Council does not consider it appropriate to pay 100% of the cost of relief (when this could use resources that could potentially be used to help four other organisations with 20% top-up discretionary rate relief).

DRAFT POLICY FOR ALLOCATING AND SETTING RENTS IN COUNCIL COMMUNITY PROPERTIES AND PROVIDING RENT SUBSIDY AND DISCRETIONARY RATE RELIEF

Adopted on DD.MM.YYYY. Review by DD.MM.YYYY

1. Premises and associated subsidies for the VCS in Croydon

- 1.1 Premises are a critical area of support for voluntary and community sector (VCS) organisations. They are also, however, an expensive resource that is often in short supply. Through the policies set out in this document, the council is determined to offer organisations equality of opportunity to access premises and subsidies and to spread the benefit as widely as possible across the VCS.

2. VCS STRATEGY 2019-2023

- 2.1 In March 2019 the Council adopted a [VCS Strategy](#) to provide an open and honest framework for prioritising the Council's support and resources for the VCS while working in partnership with it to deliver for Croydon.
- 2.2 This policy gives effect to the pledges in the VCS strategy for making best use of the Council's community properties:
- Develop clear criteria for allocating properties and rent subsidy, requiring organisations to support our priorities and making the sharing of premises a desirable requirement.
 - Allocate properties for a limited term; performance and the level of use of the premises will be monitored regularly.
 - Improve transparency by transitioning from peppercorn rents for community properties to market rents, with rent subsidy provided where appropriate.
 - Encourage organisations to share available space: we will amend our leases to allow occupiers to sublet to approved organisations and develop proposals in 2019/20 to facilitate the exchange of information on spaces offered and spaces sought by VCS organisations.

3. Overall objective of proposed policies

- 3.1 The objective of the financial assistance the Council gives to VCS organisations through the level of rent charged and the payment of Rent Subsidy and Discretionary Rate Relief (DRR) is to:
- a) Focus funding on VCS organisations with the greatest community impact and need:
- organisations that support VCS Strategy priority outcomes,
 - organisations operating in areas of the greatest deprivation,
 - organisations that use their properties as intensively as is practicable, including sharing with other VCS organisations, and

- organisations with the greatest financial need
- b) Provide transparency on how rents are charged, subsidies are offered and council community properties are allocated.
- c) Spread the benefit of the funding as widely as possible, offering opportunity to organisations that have not received funding to date, while operating within the Council's budgetary constraints.
- d) Focus rent subsidy on organisations occupying council community properties and properties leased by the Council and sublet to VCS organisations during phase 1 (2021-2024). This transitional phase will subject existing recipients of rent subsidy to the new policy's criteria; allow VCS organisations currently paying peppercorn rents to adjust to new market rents and apply for subsidy under the new rent subsidy policy if they are eligible; and enable other organisations currently paying unsubsidised rent for council properties to apply for assistance for the first time, without opening up the rent subsidy budget to wider demand. Subject to a review of the operation of this policy, VCS organisations renting premises from private landlords will be able to apply for rent subsidy from 2024/25 (Phase 2).

4. Rent charging framework for council community properties

- 4.1 A rent charging framework will be used to set market rents for council community properties, rather than peppercorn rents, with VCS tenants applying for relief through Rent Subsidy where they qualify for such relief.**
- 4.2 The market rent will reflect the geographical location, the use, the physical condition and the repair liability applicable to the property. It should be noted that a market rent for a D1 (community use) property may be significantly lower than the market rent for other properties classified for alternative commercial use.
- 4.3 Rents will be individually assessed, given the nature of Croydon's community buildings and their current occupation, using the following approach:
- Basic properties offering community activities that actively support the Council's key policies will give rise to a rental value in the region of £4 per square foot per annum (it is assumed most will fall within this category)
 - Buildings that offer more potential for third party/commercial letting will be valued at £8 per square foot per annum or higher where the property is predominantly used as office space, is in a specific geographical location commanding higher rental values (such as a town centre), or involves a use that generates a significant income

- Exceptions include scout sites, where, due to the restrictive nature of the use, a standard rent of £500 per annum will be applied
- There will also be some instances where a volunteer group with no income is undertaking a service on behalf of the Council (for example, Friends of Shirley Windmill who run a visitors centre) where it is appropriate to charge a peppercorn.
- Where a VCS organisation is investing capital to fit out premises, the Council may agree a rent-free period in recognition of this investment.

4.4 There will be no change to the current rent charged where:

- An unexpired lease sets the rent level or peppercorn rent
- An agreement reached following negotiations between the Council and a VCS organisation includes the term that no rent will be charged (e.g. where an organisation is obliged by the Council to move to alternative premises).
- Properties are subject to a Community Asset Transfer.

4.5 The income raised by moving from peppercorn rents to market rents or other rent levels proposed will be utilised for the continued funding of the VCS sector, such as through rent subsidy, and the provision of council services.

5. Rent subsidy

5.1 Eligibility Criteria for rent subsidy

5.1.1 To be eligible, organisations should satisfy the following criteria:

a. **Eligible organisations should be:**

- Community-led, a co-operative or a [social enterprise](#)
- Properly constituted, with good governance
- Capable of sustainably, legally and safely managing an asset and delivering services
- Compliant with the Equality Act 2010
- Willing to offer space (if available) and support to smaller groups.

b. **Services must be delivered primarily for the benefit of Croydon residents (more than 75% of beneficiaries must be Croydon residents)**

c. **Services must support priority outcomes of the Council's VCS Strategy:**

- People live long, healthy, happy and independent lives. We want people to be able to stay well and to manage well. Should they need support or services they will be closer to home.
- Our young people thrive and reach their full potential
- Access to homes and prevention of homelessness: all have the opportunity to access a suitable home and avoid homelessness, with no one forced to sleep on the streets

- Everyone feels safer in their street, neighbourhood, home. We pledge to treat serious youth violence including knife crime as a public health issue
- Everybody has the opportunity to work and build their career
- We value arts, culture, sports

See Appendix 1 for full details.

- d. **Rent must be payable for properties owned or leased by the Council.**
- e. **Where an organisation wholly or mainly sublets the premises to other organisations, the property may be eligible for rent subsidy** on condition that the subtenants are VCS organisations approved by the Council and the amount paid by the subtenant is no more than a reasonable charge to cover the tenant's costs of managing and running the building.
- f. **The following organisations will be excluded from receiving Rent Subsidy:**
 - Profit-making organisations (other than co-operatives and social enterprises) including commercially run Day Care and Playgroups, as rent reduction would mask the true cost of providing care; private sector or larger organisations using the property for economic benefit (notwithstanding its D1 use class), including pre-schools and play groups (as opposed to volunteer-run mother and toddler groups), will be charged the full open market rental for the property.
 - Faith groups using buildings mainly for religious services or to promote religious belief (however, faith groups providing eligible services to the wider community will not be excluded).
 - Organisations providing services to a restrictive membership group (such as a social club) therefore providing no wider community benefit, unless they are fulfilling a special need within the community that the Council accepts is essential.
 - Organisations whose rent is met through other council funding programmes or as part of a commissioning agreement.

5.2 Assessment criteria for Rent Subsidy

- 5.2.1 As the budget for Rent Subsidy will be insufficient to fund all eligible organisations, a points system will be applied to prioritise eligible applications. Additional priority will be given to eligible VCS organisations that make the most intensive use of and share their premises, to critical services, and to smaller organisations, as measured by their annual gross income (see Appendix 2 for details of points to be awarded under each of the following categories):

Use of the property

- a. **Amount of time the building is used:** a point awarded for every morning, afternoon and evening that the premises are used for community benefit from Monday to Sunday.
- b. **Extent to which premises are shared:** Organisations that share premises with at least one other VCS organisation will be given additional priority.
 - i. Applicants will be asked to provide a list of organisations sharing the premises and evidence of the times that they use the premises.
 - ii. If it is agreed that an organisation cannot share its premises (e.g. because it supports vulnerable people with sensitive or difficult issues where privacy and anonymity are essential) with another organisation, the extra points for sharing will be awarded where appropriate so the application is not disadvantaged.

Area of need

- c. **Deprivation and social isolation:** Organisations that deliver a service primarily in an area that ranks in the top five Lower Super Output Areas (LSOAs) in the borough for multiple deprivation will receive an additional 5 points. The rating will be taken from the [Index of Multiple Deprivation](#), the official measure of relative deprivation in England. (See Appendix 3 for a map of top 5 LSOAs)

Critical services

- d. **Extent to which an organisation is critical for achieving priority outcomes:** VCS organisations considered by the Council to provide critical services will receive additional priority if it assesses that, should the organisation cease to provide a service, a council priority outcome would not be achieved, for example:
 - if the organisation was the only one delivering a service to support a given priority outcome, or
 - if the impact of an organisation ceasing to operate would have an unacceptably significant knock-on effect on the achievement of a given priority outcome.

Financial assessment and ability to pay

- e. **Income:** Organisations with a lower gross annual income (up to £5,000 and between £5,000 and £50,000) will be given additional priority.
- f. **Reserves:** organisations with reserves equivalent to more than two years' operating costs will not receive funding
- g. **Other sources of income:** Organisations with a gross annual income of more than £10,000 will be asked what steps they have taken to obtain more funding from non-council sources and be offered support to do so, if required.

- 5.2.2 VCS organisations will be asked to provide their most recent accounts, a business plan or budget (the level of detail to be proportionate to the size of the organisation), and the amount and purpose of funding currently received from the Council and other sources, to allow an assessment of the financial management and viability of the organisation and the potential impact of state aid rules (see section 8).
- 5.2.3 We want to encourage and enable VCS organisations to become less reliant on council funding. The Council's Communities Team can advise groups on obtaining funding from other sources and increasing their income, for example through crowdfunding and bid writing. In addition, the Council has commissioned VCS infrastructure organisations to provide advice and support on bid writing and fundraising.

5.3 Rent Subsidy payable

- 5.3.1 **Rent Subsidy will be awarded to successful applicants for a period of three years.** This offers VCS organisations financial stability.
- 5.3.2 **Rent Subsidy will be paid at a rate equivalent to up to 100% of the contractual rent, unless the subsidy is reduced because of a failure to share or sublet premises when required (see 5.3.4 and 5.3.5 below), to support council priority outcomes, or to perform effectively**
- 5.3.3 **The amount of Rent Subsidy paid will be reduced if the contractual rent is reduced.** However, due to budgetary constraints, there is no guarantee that an increase in rent during the three year period would be covered by the subsidy scheme.
- 5.3.4 Standard clauses will be inserted into leases which will include the requirement for annual monitoring of the tenant's activities and the ability to amend the Rent Subsidy should the VCS organisation not fulfil the scheme criteria. Subject to the written approval of the Council, organisations will be allowed to hire or sublet under-used parts of their premises to a VCS organisation that provides a community benefit to Croydon. This is in addition to standard clauses (already inserted in new leases since 2016) requiring tenants to make premises available free of charge for a number of hours per year to certain qualifying groups nominated by the Council or ward councillors. Refusal could reduce the level of Rent Subsidy.
- 5.3.5 Rent subsidy to organisations subletting to VCS organisations approved by the Council will not be reduced as long as they keep their charges at a level that enables them to recover no more than their reasonable costs of running and managing the building. Rent subsidy will be reduced if organisations are assessed to be making a profit from the arrangement.
- 5.3.6 In the event of the Council deciding to reduce rent subsidy within the three year funding period, the Council will give 6 months' notice of its decision, and give reasons for its decision.

- 5.3.6 VCS organisations considered to be under-utilising premises will be given 9 months to find other appropriate VCS organisation(s) to sublet the vacant or under-used part of premises to or to share the premises with, otherwise the level of rent subsidy may be reduced. The Communities Team can provide assistance in finding a suitable organisation to share with. The Council will seek to develop a web-based system to put VCS organisations and groups that have available space(s) within their premises in touch with other VCS organisations and groups that are looking for premises or space. Authorisation must be obtained from the Estates Team for subletting part of the premises, as the lease may need to be amended.

6. Allocation of council community properties

6.1 Identification of properties to be allocated

- 6.1.1 The Council's Estates Team will work closely with the VCS to identify suitable future uses for vacant space within its community properties portfolio, the appropriate route for its allocation and the terms of any lease agreement. This may be through Community Asset Transfer (CAT), competitive tender, or through discussion with specific groups identified as suitable occupiers for the space concerned. The Council will publish a list of council community premises and their lessees.
- 6.1.2 The Council will continue to consider CATs on a case by case basis for its properties. CATs transfer the council asset to the occupying VCS organisation on a long lease at a peppercorn rent. The organisation takes on full responsibility for the cost of running the building (subject to any transitional relief arrangements). A CAT may be appropriate in specific circumstances where a council property asset is surplus to requirements, the Council considers that the VCS organisation is better placed than itself to deliver the service in question (for example, a community hall), and the transfer would enable them to benefit from grant funding available to organisations with longer leases.

6.2 Eligibility Criteria for the allocation of a property

- 6.2.1 To be eligible, organisations should satisfy the following criteria:
- a. **Eligible organisations should be:**
 - Properly constituted, with good governance
 - Capable of sustainably, legally and safely managing an asset and delivering services
 - Compliant with the Equality Act 2010
 - Willing to offer space (if available) and support to smaller groups.
 - b. **Services must be delivered primarily for the benefit of Croydon residents** (more than 75% of beneficiaries must be Croydon residents)
 - c. **Services must support priority outcomes of the Council's VCS Strategy:**

- People live long, healthy, happy and independent lives. We want people to be able to stay well and to manage well. Should they need support or services they will be closer to home.
- Our young people thrive and reach their full potential
- Access to homes and prevention of homelessness: all have the opportunity to access a suitable home and avoid homelessness, with no one forced to sleep on the streets
- Everyone feels safer in their street, neighbourhood, home. We pledge to treat serious youth violence including knife crime as a public health issue
- Everybody has the opportunity to work and build their career
- We value arts, culture, sports

See Appendix 1 for full details.

6.3 [Assessment criteria of priority for a property](#)

6.3.1 As the supply of properties is insufficient for all potentially eligible VCS organisations that may need premises, the Council will consider applications according to a number of criteria including:

- The soundness of the business case for why the building or land is needed
- The community benefit offered by the organisation
- Local need for the service
- Financial management and viability: VCS organisations will be asked to provide their most recent audited/checked accounts, a business plan or budget, and sources of funding.
- Ability for the organisation to manage an asset and comply with the lease obligations.

6.3.2 Leases are excluded from the security of tenure provisions of the Landlord and Tenant Act 1954. This means that tenants do not have an automatic right to renew the lease when it expires. The length of the lease granted by the Council depends on a number of factors including: the length of a commission agreement provided; the financial viability of the organisation; its ability to manage a property and comply with the terms of the lease; the initial investment required by the organisation to refurbish the property; and the Council's medium or long term plans for the property.

6.3.4 When the lease expires, organisations should not assume that the lease will be renewed automatically. The Council will assess whether the tenant organisation continues to meet the eligibility criteria (set out at 6.2.1) and whether it is appropriate for them to remain in occupation under a renewed lease or for the property to be offered to an alternative organisation. In considering whether to renew the lease, the Council will take into account the means by which the lease was originally acquired, for example whether it was subject to a competitive tender,

whether the priorities against which eligibility was assessed at the time the property was allocated are still relevant, and the organisation's satisfactory performance, compliance with the lease and regular use of the property for purposes agreed with the Council. The Council will also consider its needs and community needs at the time the decision is made.

- 6.3.5 If the Council decides to not to renew the lease, it should give the lessee six months' notice.

7. Discretionary Rate Relief (DRR) for VCS Organisations

7.1 Business rates relief

- 7.1.1 There are a [number of schemes](#) under which organisations may receive relief from national non-domestic rates (NNDR), commonly known as 'business rates'. This policy is for VCS organisations; it does not deal with other types of mandatory or discretionary rate relief, such as [small business rate reduction](#) and DRR for businesses.

7.2 Eligibility criteria for discretionary rate relief for VCS organisations

- 7.2.1 DRR can be a lifeline for small VCS organisations. This policy is designed to ensure that relief is targeted at organisations that need it most, irrespective of whether they occupy a council-owned property.
- 7.2.2 DRR will be awarded to eligible community-led organisations, cooperatives and social enterprises. Some of these organisations may be eligible for mandatory rate relief which is paid at 80% of the national non-domestic rates (NNDR) charge: registered charities, community amateur sports clubs (CASCs) and Charitable Community Benefit Societies. Successful applicants for DRR will be awarded 20% of the national non-domestic rates (NNDR) charge. In the case of community organisations eligible for mandatory rate relief, this will be top-up DRR to provide 100% relief. The property must be wholly or mainly used for activities that meet the criteria set out under 7.2.3 below.
- 7.2.3 As with other financial support for the VCS including the Community Fund and Rent Subsidy, organisations applying for DRR must satisfy all of the following eligibility criteria:
- a. **The organisation must be community-led, a co-operative or social enterprise**
 - b. **Services must be delivered for the benefit of Croydon residents (more than 75% of beneficiaries must be Croydon residents)**
 - c. **Services must support priority outcomes of the Council's VCS Strategy (see Appendix 1)**
 - d. **The organisation must meet requirements on governance, management and financial competence (see 9.1)**

e. The organisation must comply with the Equality Act 2010.

7.2.4 The following organisations are ineligible for DRR:

- charity shops and cafés operated by trading arms of charities
- housing associations
- buildings used mainly for worship or to promote religious belief
- bodies operating a restrictive membership policy, unless they are fulfilling a special need within the community
- profit making organisations (other than co-operatives and social enterprises)
- empty properties
- social clubs.

7.2.5 It should be noted that buildings registered for public religious worship or church halls are exempt from business rates altogether. Where possible, organisations that are not charities will be referred to the [Small Business Discretionary Rates Reduction Scheme](#) managed by the Council's Business Rates Team. This council-run, government funded, scheme provides relief to organisations who demonstrate specific employment and economic benefits for Croydon residents. The scheme will bring in central government funding and free up the Council's DRR budget to support other organisations.

7.2.5 The Council encourages eligible organisations to apply for mandatory 80% Business Rates Charity Relief. To qualify, an organisation:

1. The ratepayer must be:

- Registered with the Charity Commission; or
- An organisation that is [specifically exempt](#) from registration with the charity commission; or
- A sports club that is registered with The Community Amateur Sports Club scheme (CASC); or
- An academy school

2. The property must be wholly or mainly used for the charitable purposes of that organisation

7.2.6 Guidance on applying for mandatory rate relief for property wholly or mainly used for charitable purposes is available [here](#). To obtain the application form click on <https://www.croydon.gov.uk/business/businessrates/reductions/relief> and scroll to the bottom of the screen for the DOWNLOAD section.

7.3 [Award limit for discretionary rate relief](#)

7.3.1 As the budget for DRR is limited, it is anticipated that the total relief sought by eligible organisations will exceed the budget available. Priority will be given to

applications for DRR from organisations occupying properties with lower rateable values.

- 7.3.2 Applications from eligible organisations will be ranked according to the rateable value of the property, from lowest to highest. DRR will be allocated for properties (starting with the lowest proposed award of DRR on the list) until the budget for that year is used up.

7.4 Application and decision process

- 7.4.1 Applications for DRR will be invited annually in October. Relief will be awarded for one year. Organisations must reapply in October each year for DRR for the following financial year. Retrospective applications for rate relief, e.g. to clear rate arrears, will not be admitted.
- 7.4.2 VCS organisations will be asked to submit an application form, their most recent audited/checked accounts, the amount and purpose of funding currently received from the Council and other sources and a business plan or budget to allow an assessment of their financial management and viability.
- 7.4.3 The maximum amount of DRR paid for a property will vary each year, as it will be dependent on the number of applications received. A decision letter will be sent to the organisation by March. The DRR will be credited to its rate account in April. There will be no appeal and no further applications will be considered until the following October.
- 7.4.4 **Awards in valuation years:** every three years the government's Valuation Office Agency will calculate the rateable value of each property. The next valuation year is 2021. As some rate bills can vary considerably as a result, the Council will calculate the DRR to be awarded only once the new rateable value is known and the government has notified the Council of the multiplier to be used to calculate the business rate charge. A decision letter will be sent to the organisation in March.
- 7.4.5 **Awards in non-valuation years:** in order to give organisations a decision as early as possible, subject to administrative arrangements, the Council will calculate the DRR amount on the basis of the old year's business rate charge and issue a decision in January. It is likely that the new business rate charge will subject to an increase for inflation (applied through the multiplier set by central government). The VCS organisation would therefore have to pay the difference between the DRR awarded (20% of the old year's business rate charge) and the new rate charge and will receive a bill asking for the difference in April.
- 7.4.6 There is no way of anticipating which organisations will apply or what their rateable value will be, but under this policy eligible organisations with smaller rateable values will be more likely to receive relief than those with relatively higher values.

- 7.4.7 The allocation system prioritises smaller qualifying organisations, although there is no guarantee that an organisation will get relief two years in a row, even if its circumstances have not changed.

8 State Aid

- 8.1 Any award of rent subsidy or discretionary rate relief, or use of a council community property for free or at less than market price (such as a peppercorn rent) or rent rebates may count as state aid and if so must therefore comply with rules on state aid. The Council must therefore consider whether state aid rules apply which will include considering whether services provided or goods traded by a VCS organisation applying for assistance under these policies have the potential to be traded across EU member states.
- 8.2 There are also exemptions which may be applicable. In order to allow officers to consider if State Aid or any of the exemptions apply, the application forms for rent subsidy, discretionary rate relief and council community properties will require organisations to confirm all funding received over a three year period.

9. Performance monitoring and other conditions

- 9.1 Applicants for rent subsidy, DRR or council community properties are expected to meet requirements on governance (including constitution, terms of reference or other governing document, details of the board/committee, and decision-making processes), management (including policies concerning health and safety, safeguarding, and equal opportunities, public liability insurance and monitoring arrangements) and financial competence (including latest accounts, decision-making processes and monitoring). However, the evidence required will depend on the scheme concerned, following the principle of proportionality. The requirements will be set out in the respective application forms for rent subsidy, DRR or council community properties.
- 9.2 Continued occupancy of the property and payment of Rent Subsidy and DRR will depend on the ongoing performance of the organisation against the VCS strategy priority outcomes and the level of use of the premises. The organisation must also comply with the terms of the subsidy or relief, remain solvent and not subject to a winding up order. Rent subsidy or discretionary rate relief may be recovered if it is misused or in the event of fraudulent activity. Similarly, usage of a council community property and compliance with the terms of the lease will be monitored; the lease may be terminated in the event of a breach of the terms. Compliance with these conditions will be monitored regularly. The Council will align monitoring arrangements for rent subsidy and discretionary rate relief and where possible with grant performance monitoring.
- 9.3 The Council is committed to reducing fraud in all its forms. An organisation which tries to fraudulently apply for a council community property, rent subsidy or discretionary rate relief by falsely declaring their circumstances, or providing a false statement or evidence in support of their application, may have committed an

offence. Where we suspect that such a fraud may have occurred, the matter will be investigated in line with the Council's Anti-Fraud Strategy. This may lead to criminal proceedings being instigated.

- 9.4 The organisation should obtain user feedback on a regular basis to monitor service provision. Evidence of this will form part of the annual reviewing process and failure to satisfy this may lead to the subsidy being withdrawn.
- 9.5 Voluntary and community organisations in receipt of a Rent Subsidy or DRR will agree a statement with the Council that summarises the use of the premises and the activities linked to the subsidy and how they benefit the service provided to the residents.
- 9.6 The organisation must acknowledge the Council's assistance in literature and publicity about the work of the organisation, should a subsidy or DRR be granted.

10. Implementation

10.1 Notice of changes:

- 10.1.1 All recipients of Rent Subsidy and of DRR in 2017/18 and 2018/19 have received either emails or letters to alert them to the review of both schemes and warn that the new schemes when implemented will be competitive with no guarantee of funding.
- 10.1.2 VCS organisations are advised to plan for the reduction or end of any rent subsidy they receive and to treat rent payable as a core cost when applying for any funding.

10.2 Implementation arrangements:

- 10.2.1 Allocations of council community properties be made under the new policy from 1 April 2020, commencing with a review of leases that have expired and are holding over.
- 10.2.2 The new policies for Rent Subsidy and DRR will be implemented from 1 April 2021.
- 10.2.3 The transition from peppercorn rents to market rents will be implemented over time from 1 April 2021 as leases expire and are renegotiated. When break clauses allow it, leases will be brought to an end in order to renegotiate the terms. Where leases have expired and are being held over, a market rent will be charged from 1 April 2021.

10.2.4 The new Rent Subsidy scheme will be limited for three years to VCS organisations renting properties owned or leased by the Council. This will provide scope for supporting VCS organisations moving from peppercorn rents to market rents and those already paying rent in council properties who have not yet had the opportunity to apply for rent subsidy, as well as those already receiving rent subsidy. The operation of the scheme will be reviewed early in 2022/23. Subject to the outcome of the review, a decision will be taken on whether to open the scheme to organisations renting in the private sector from 2023/4.

10.3 Implementation timetable

- VCS organisations had the opportunity to comment on these proposals for 6 weeks from 9 October to 19 November 2019. Consultation responses were considered and the proposals amended accordingly.
- It is proposed to take this to Cabinet for consideration on 20 January 2020.
- If approved on 20 January 2020, the new Rent Subsidy scheme would open on 10 February 2020 for applications for rent subsidy for the three year period (April 2021 to March 2024). Applications would close on 13 March 2020, giving organisations 5 weeks to apply. VCS organisations would be notified of decisions on rent subsidy for 2021/24 in April 2020.
- Council community properties would be allocated under the new policy from 1 April 2020, starting with a review of expired leases that are holding over.
- Applications under the new scheme for DRR for the financial year 2021/22 would be invited in October 2020. Decisions would be announced in March 2021.
- Rent Subsidy would be payable under the new policy from 1 April 2021, giving organisations a full 11 months to prepare for any changes to their funding.
- The transition from peppercorn rents to market rents would be implemented from 1 April 2021: immediately for expired leases, and in other cases, as leases expire or break clauses allow.
- During 2020/21 Rent Subsidy and DRR will be payable under current arrangements.

Appendix 1: VCS Strategy Priorities

- 1. People live long, healthy, happy and independent lives. We want people to be able to stay well and to manage well. Should they need support or services they will be closer to home.**
 - a. Visible, cohesive and resilient communities
 - b. Croydon becomes a more equal place
 - c. Healthy, happy and independent lives: are lived by as many as possible for as long as possible
 - d. Access to effective health services and care services when needed
- 2. Our young people thrive and reach their full potential**
 - a. Children and young people in Croydon and their families are safe, healthy and happy; young people aspire to be the best they can be.
 - b. Every child and young person can access high-quality education and youth facilities
 - c. Getting more young people involved in taking part in local democracy and in tackling the issues that matter most to them
- 3. Access to homes and prevention of homelessness: all have the opportunity to access a suitable home and avoid homelessness, with no one forced to sleep on the streets**
- 4. Everyone feels safer in their street, neighbourhood, home. We pledge to treat serious youth violence including knife crime as a public health issue**
 - a. Working in partnership to reduce crime; including serious youth violence, domestic abuse and sexual violence, and hate crime
 - b. Anti-social behaviour and environmental crime are reduced throughout the borough, through work with partners and local community involvement
- 5. Everybody has the opportunity to work and build their career**
 - a. More residents can develop their skills through apprenticeships, academic and technical courses and access employment opportunities
- 6. We value arts, culture, sports**
 - a. Croydon's cultural offer enhances our town and creates places where people want to live, work and visit
 - b. Good, affordable and accessible sports and leisure facilities enable people to be as active and healthy as they want to be
 - c. Our parks and open spaces are safe, pleasant, thriving places where everyone can exercise and have fun

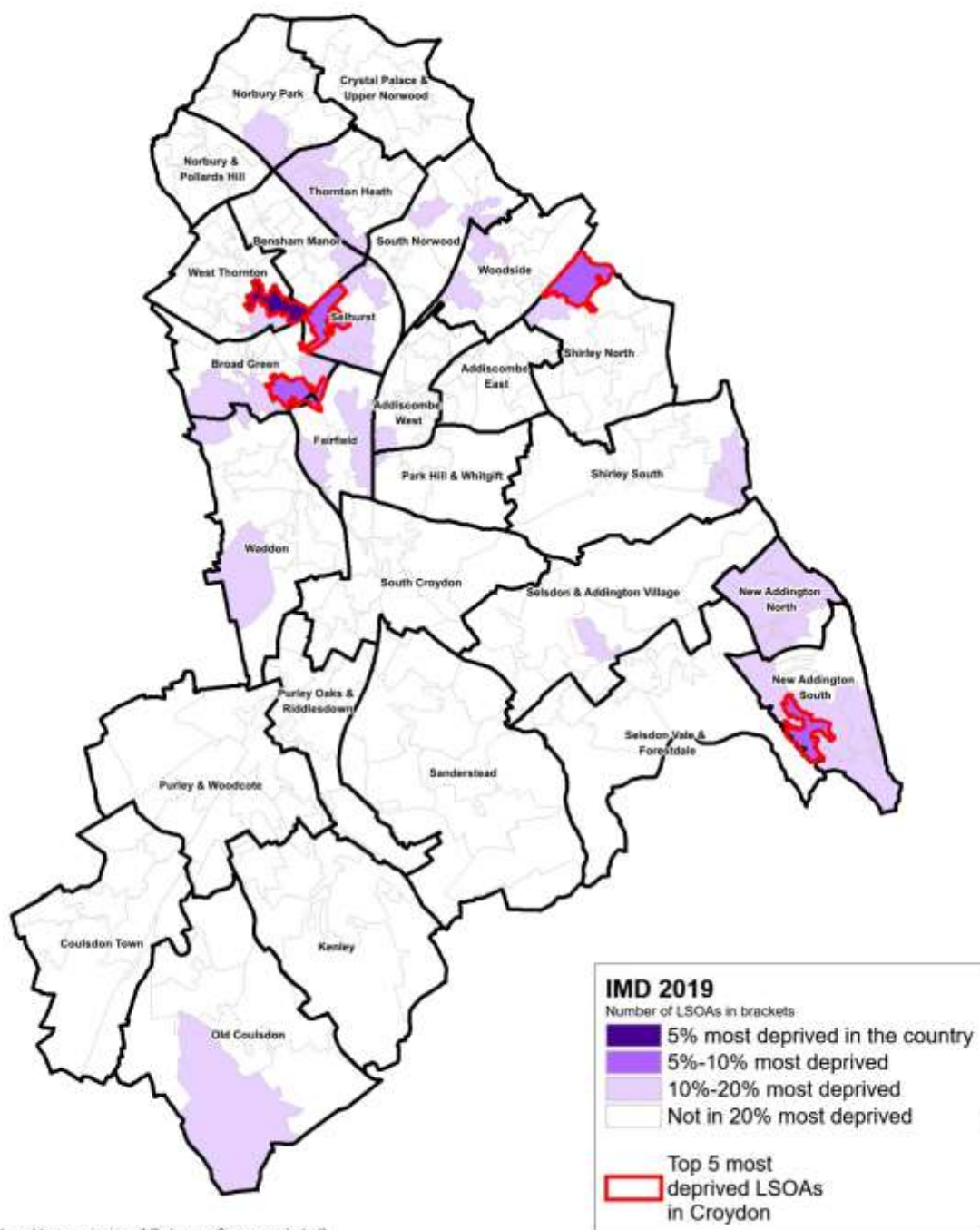
Appendix 2 Assessment and scoring scheme for Rent Subsidy Assessment (an application form will be developed)

Preliminary Questions			
1	Has the organisation provided all the evidence requested in the application form? Does evidence provided demonstrate that the organisation meets the Council's eligibility criteria? a. Is it community led? b. Is it properly constituted, with good governance? (10.1) c. Is it capable of sustainably, legally and safely managing an asset and delivering services? d. Does it comply with the provisions of the Equality Act 2010? e. Is it willing to offer space (if available) and support to other groups?	Yes to all questions (carry on to question 2)	No (organisation is not eligible for this support)
2	What proportion of the people benefitting from the organisation's services live in the London Borough of Croydon?	75% or more (carry on to question 3)	0-84% (organisation is not eligible for this support)
3	Do the organisation's services support priority outcomes of the VCS Strategy?	Yes X (carry on to question 4)	No (organisation is not eligible for this support)
4	Does the organisation occupy a council-owned building or a building leased by the Council?	Yes X (carry on to question 5)	No (organisation is not eligible for this support in 2021/24)
5	Has the organisation provided its most recent accounts?	Yes X (carry on to question 6)	No (organisation is not eligible for this support)
6	Has the organisation provided a budget or business plan?	Yes X (carry on to question 7)	No (organisation is not eligible for this support)
7	Is the amount of reserves equal to or greater than two years of the organisation's operating costs? a. Amount of operating costs b. Gross annual income	No (carry on to question 8 a. Amount b. Amount)	Yes (organisation is not eligible for this support)
8	Organisation should list sources of funding to be received over the three years (2021/24) from Croydon Council, stating the amount, funding programme and purpose; and any contracts with the Council, what the contract is for, the term and the value	Amount	Funding programme Purpose
9	Organisation should list the sources of funding to be received over the three years (2021/24) from other sources stating the amount, organisation/ funding programme and purpose.	Amount	Funding programme Purpose
10	If the organisation's gross annual income is £10,000 or more, what steps has the organisation taken to obtain more funding from non-council sources?	Fund raising measures attempted	
11	What is the annual rent?	Amount	
12	How much is the organisation seeking from Rent Subsidy each year?	Amount	

Scored Questions			Score
13	On average, how many mornings a week is the building in use?		(0 – 7)
14	On average, how many afternoons a week is the building in use?		(0 – 7)
15	On average, how many evenings a week is the building in use?		(0 – 7)
16	Does the organisation share any space with other users? (if yes, details are required) (If sharing is not possible, give reasons)		(No = 0, Yes = 5)
17	Is the organisation delivering a service primarily in an area that ranks in the top five Lower Super Output Areas (LSOAs) in the borough for multiple deprivation (according to the Index of Multiple Deprivation)?		Yes – 5 No - 0
18	Is the Council satisfied the organisation critical for achieving a council priority outcome? a. Is the organisation the only one delivering a service to support a priority outcome? b. Would the organisation ceasing to operate have an unacceptably significant impact on the achievement of a priority outcome?		Yes – 40 No - 0
19	Organisation's gross annual income: £ Is the gross income low (up to £5k), medium (up to £50k) or high (over £50k)?	Amount	(low = 10, med = 5, high = 0)
Maximum total points awarded			81

Appendix 3

Indices of Deprivation 2019 Croydon Lower Super Output Areas (LSOAs)



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Equality Analysis Form

1. Introduction

1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

2. Proposed change

Directorate	Gateway, Strategy and Engagement
Title of proposed change	Policy for allocating council community properties, setting the rents in those properties and providing rent subsidy and discretionary rate relief (DRR) to voluntary and community organisations
Name of Officer carrying out Equality Analysis	John Montes

2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

The Council gives the voluntary and community sector (VCS) premises related support worth more than £0.5m a year. However, often this support is given to organisations already in receipt of it, with no clear criteria and no assessment of the community benefit provided by the organisations. The Council intends to keep support at the current level but focus it more effectively. The purpose of the new policy is therefore to:

- Focus premises related support on voluntary and community sector (VCS) organisations with the greatest community impact and need: organisations that support VCS Strategy priority outcomes, organisations operating in areas of the greatest deprivation, organisations that use their properties as intensively as is practicable, including sharing with other VCS organisations, and organisations with the greatest financial need.
- Provide transparency on how rents are charged, rent subsidy and discretionary rate relief are offered and how council community properties are allocated through having clear, written policies.
- Spread the benefit of the funding as widely as possible, offering opportunity to organisations that have not received funding to date, while operating within the Council's budgetary constraints.
- Focus rent subsidy on organisations occupying council community properties and properties leased by the Council and sublet to VCS organisations during phase 1 (2021-2024). This transitional phase will subject existing recipients of rent subsidy to the new policy's criteria; allow VCS organisations currently paying peppercorn rents to adjust to new market rents and apply for subsidy under the new rent subsidy policy if they are eligible; and enable other organisations currently paying unsubsidized rent for council properties to apply for assistance for the first time, without opening up the rent subsidy budget to wider demand. Subject to a review of the operation of this policy, VCS organisations renting premises from private landlords will be able to apply for rent subsidy from 2024/25.

3. Impact of the proposed change

Important Note: It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

3.1 Deciding whether the potential impact is positive or negative

Table 1 – Positive/Negative impact

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	<p>There is a potential positive impact across all protected characteristics, given that the policy may allow new and smaller organisations to receive premises related support and access to council community properties, either directly or through sharing, when they may not have previously done so.</p> <p>Support will be focussed on organisations that support priority outcomes in the VCS strategy, thus the following groups are more likely to benefit as follows:</p> <p>For older people:</p> <ul style="list-style-type: none"> Support for community interventions and activities that enable older people to live healthy, happy and independent 	<p>A number of organisations working with older people and with children and young people either rent property from the council or receive rent subsidy/DRR. Provided these organisations meet the eligibility criteria it is expected that this support will continue. However, as the policy will allow financial assistance to be distributed more broadly across VCS organisations without increasing the overall amount of funding provided, it is possible that an organisation with reserves totaling more than two years' operating costs or occupying a property with a higher rateable value, that is already in receipt of financial assistance, may cease to receive support if displaced by an eligible smaller organisation.</p>	<p>VCS organisations who responded to the consultation survey on the proposals have been matched alongside the financial assistance they currently receive, and the people with protected characteristic(s) they work with.</p>

	<p>lives for as long as possible, avoiding isolation and loneliness. Community support for older people with long term health conditions or dementia, and carers support services.</p> <p><i>For children and young people:</i></p> <ul style="list-style-type: none"> • Services, activities and facilities that support the physical and emotional wellbeing of children and their families and encourage young people to aspire to be the best they can be. • Awareness raising and prevention of trafficking, exploitation and FGM. • Integrated youth work with young people in school and excluded from school that will divert them from offending and keep them safe from violence 		
Disability	<p>There is a potential positive impact across all protected characteristics, given that the policy may allow new and smaller organisations to receive premises related support and access to council community properties, either directly or through sharing, when they may not have previously done so.</p> <p>Support will be focussed on organisations that support priority outcomes in the VCS strategy. For people with disabilities this is likely to mean:</p> <ul style="list-style-type: none"> • Support for community interventions and activities that enable disabled people to live healthy, happy and independent lives, avoiding isolation, loneliness and anxiety and improving access to employment. 	<p>A number of organisations working with those with disabilities either rent property from the council or receive rent subsidy/DRR. Provided these organisations meet the eligibility criteria it is expected that this support will continue. However, as the policy will allow financial assistance to be distributed more broadly across VCS organisations without increasing the overall amount of funding provided, it is possible that an organisation with reserves totaling more than two years' operating costs or occupying a property with a higher rateable value, that is already in receipt of financial assistance, may cease to receive support if displaced by an eligible smaller organisation.</p>	<p>VCS organisations who responded to the consultation survey on the proposals have been matched alongside the financial assistance they currently receive, and the people with protected characteristic(s) they work with.</p>

	<ul style="list-style-type: none"> • Community support for disabled people with long term health conditions, and carers support services. • Preventative early intervention enablement and support activities for physical and mental wellbeing. Community support for people with particular conditions, including HIV and mental health conditions. 		
Gender	<p>There is a potential positive impact across all protected characteristics, given that the policy may allow new and smaller organisations to receive premises related support and access to council community properties, either directly or through sharing, when they may not have previously done so.</p> <p>Support will be focussed on organisations that support priority outcomes in the VCS strategy, including organisations that provide:</p> <ul style="list-style-type: none"> • Awareness raising and prevention of trafficking, exploitation and FGM. • Community responses to domestic abuse and sexual violence (DASV), which affects all parts of the community, including people in marriages and civil partnerships. • Support for lone parents (overwhelmingly women) that improves access to employment 	<p>A number of organisations working with women either rent property from the council or receive rent subsidy/DRR. Provided these organisations meet the eligibility criteria it is expected that this support will continue. However, as the policy will allow financial assistance to be distributed more broadly across VCS organisations without increasing the overall amount of funding provided, it is possible that an organisation with reserves totaling more than two years' operating costs or occupying a property with a higher rateable value, that is already in receipt of financial assistance, may cease to receive support if displaced by an eligible smaller organisation.</p>	<p>VCS organisations who responded to the consultation survey on the proposals have been matched alongside the financial assistance they currently receive, and the people with protected characteristic(s) they work with.</p>

Gender Reassignment	<p>DRR/rent subsidy is not currently provided to VCS organizations working with this group. By extending funding to more organisations, it is possible that this protected characteristic group may benefit.</p> <p>Support will be focussed on organisations that support priority outcomes in the VCS strategy, including organisations that:</p> <ul style="list-style-type: none"> • Run activities that promote community cohesion and festivals and cultural activities that are inclusive and diverse. • Contribute to partnership work to reduce hate crime 	<p>DRR/rent subsidy is not currently provided to VCS organizations working with this group. Provided these organisations meet the eligibility criteria it is expected that this support will continue. However, as the policy will allow financial assistance to be distributed more broadly across VCS organisations without increasing the overall amount of funding provided, it is possible that an organisation with reserves totaling more than two years' operating costs or occupying a property with a higher rateable value, that is already in receipt of financial assistance, may cease to receive support if displaced by an eligible smaller organisation.</p>	<p>VCS organisations who responded to the consultation survey on the proposals have been matched alongside the financial assistance they currently receive, and the people with protected characteristic(s) they work with. The consultation feedback shows that of those who responded, no organisations working with the following protected characteristic groups rented a council property or received DRR/rent subsidy: Gender Reassignment, Sexual Orientation and Marriage or Civil Partnership.</p>
Marriage or Civil Partnership	<p>DRR/rent subsidy is not currently provided to VCS organizations working with this group. By extending funding to more organisations, it is possible that this protected characteristic group may benefit.</p> <p>Support will be focussed on organisations that support priority outcomes in the VCS strategy, including organisations that provide community responses to domestic abuse and sexual violence, which affects all parts of the community, including people in marriages and civil partnerships.</p>		<p>VCS organisations who responded to the consultation survey on the proposals have been matched alongside the financial assistance they currently receive, and the people with protected characteristic(s) they work with. The consultation feedback shows that of those who responded, no organisations working with the following protected characteristic groups rented a council property or received DRR/rent subsidy: Gender Reassignment, Sexual Orientation and Marriage or Civil Partnership.</p>
Religion or belief	<p>There is a potential positive impact across all protected characteristics, given that the</p>		<p>VCS organisations who responded to the consultation</p>

	<p>policy may allow smaller organisations to receive funding when they may not have previously done so. However, it should be noted that under this policy organisations are supported if they provide services to the wider community rather than to their congregation alone.</p> <p>Support will be focussed on organisations that support priority outcomes in the VCS strategy, including organisations that:</p> <ul style="list-style-type: none"> • Run activities that promote community cohesion and festivals and cultural activities that are inclusive and diverse. • Contribute to partnership work to reduce hate crime 		<p>survey on the proposals have been matched alongside the financial assistance they currently receive, and the people with protected characteristic(s) they work with.</p>
Race	<p>There is a potential positive impact across all protected characteristics, given that the policy may allow smaller organisations to receive funding when they may not have previously done so.</p> <p>Support will be focussed on organisations that support priority outcomes in the VCS strategy, including organisations that provide:</p> <ul style="list-style-type: none"> • Activities that promote community cohesion and festivals and cultural activities that are inclusive and diverse. • Support for migrants and people with no recourse to public funds, including help into jobs and reconnection to their home country. • Integrated youth work, involving young people at school, those excluded from school and those at risk of reoffending 	<p>A number of organisations working with those with BAME either rent property from the council or receive rent subsidy/DRR. Provided these organisations meet the eligibility criteria it is expected that this support will continue. However, as the policy will allow financial assistance to be distributed more broadly across VCS organisations without increasing the overall amount of funding provided, it is possible that an organisation with reserves totaling more than two years' operating costs or occupying a property with a higher rateable value, that is already in receipt of financial assistance, may cease to receive support if displaced by an eligible smaller organisation.</p>	<p>VCS organisations who responded to the consultation survey on the proposals have been matched alongside the financial assistance they currently receive, and the people with protected characteristic(s) they work with.</p>
Sexual Orientation	<p>DRR/rent subsidy is not currently provided to VCS organizations working with this group. By extending funding to more</p>		<p>VCS organisations who responded to the consultation survey on the proposals have</p>

	<p>organisations, it is possible that this protected characteristic group may benefit.</p> <p>Support will be focussed on organisations that support priority outcomes in the VCS strategy, including organisations that:</p> <ul style="list-style-type: none"> • Run activities that promote community cohesion and festivals and cultural activities that are inclusive and diverse. • Contribute to partnership work to reduce hate crime 		<p>been matched alongside the financial assistance they currently receive, and the people with protected characteristic(s) they work with. The consultation feedback shows that of those who responded, no organisations working with the following protected characteristic groups rented a council property or received DRR/rent subsidy: Gender Reassignment, Sexual Orientation and Marriage or Civil Partnership.</p>
Pregnancy or Maternity	<p>There is a potential positive impact across all protected characteristics, given that the policy may allow smaller organisations to receive funding when they may not have previously done so.</p> <p>Support will be focussed on organisations that support priority outcomes in the VCS strategy, including organisations that provide:</p> <ul style="list-style-type: none"> • Services, activities and facilities that support the physical and emotional wellbeing of children and their families • Support for lone parents (overwhelmingly women) that improves access to employment 	<p>A number of organisations working with mothers/parents either rent property from the council or receive rent subsidy/DRR. Provided these organisations meet the eligibility criteria it is expected that this support will continue. However, as the policy will allow financial assistance to be distributed more broadly across VCS organisations without increasing the overall amount of funding provided, it is possible that an organisation with reserves totaling more than two years' operating costs or occupying a property with a higher rateable value, that is already in receipt of financial assistance, may cease to receive support if displaced by an eligible smaller organisation.</p>	<p>VCS organisations who responded to the consultation survey on the proposals have been matched alongside the financial assistance they currently receive, and the people with protected characteristic(s) they work with.</p>

Important note: You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

3.2 Additional information needed to determine impact of proposed change

Table 2 – Additional information needed to determine impact of proposed change

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:

Additional information needed and or Consultation Findings	Information source	Date for completion

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact)
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

Severity of Impact	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	Likelihood of Impact			

Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

Equality Analysis

Table 3 – Impact scores

Column 1	Column 2	Column 3	Column 4
PROTECTED GROUP	LIKELIHOOD OF IMPACT SCORE	SEVERITY OF IMPACT SCORE	EQUALITY IMPACT SCORE
	<p>Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p>1 = Little impact 2 = Moderate impact 3 = Severe impact</p>	<p>Calculate the equality impact score for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group.</p> <p>Equality impact score = likelihood of impact score x severity of impact score.</p>
Age	1	2	2
Disability	1	2	2
Gender	1	2	2
Gender reassignment	1	2	2
Marriage / Civil Partnership	1	2	2
Race	1	2	2
Religion or belief	1	2	2
Sexual Orientation	1	2	2
Pregnancy or Maternity	1	2	2

4. Statutory duties

4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

☐

Eliminating unlawful discrimination, harassment and victimisation

☐

Fostering good relations between people who belong to protected characteristic groups

☐

Important note: If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

5. Action Plan to mitigate negative impacts of proposed change

Important note: Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

Table 4 – Action Plan to mitigate negative impacts

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	A VCS organisation working with this group may lose financial assistance in the circumstances described in section 3.1.	With regard to rent subsidy, the council may apply extra priority under this policy if it considers that the organisation delivers a critical service. In addition, the Communities Team provide support and guidance on accessing funding opportunities.	Simon Bashford	During the duration of this policy
Race	A VCS organisation working with this group may lose financial assistance	With regard to rent subsidy, the council may apply extra priority under	Simon Bashford	During the duration of this policy

Equality Analysis

	in the circumstances described in section 3.1.	this policy if it considers that the organisation delivers a critical service. In addition, the Communities Team provide support and guidance on accessing funding opportunities.		
Sex (gender)	A VCS organisation working with this group may lose financial assistance in the circumstances described in section 3.1.	With regard to rent subsidy, the council may apply extra priority under this policy if it considers that the organisation delivers a critical service. In addition, the Communities Team provide support and guidance on accessing funding opportunities.	Simon Bashford	During the duration of this policy
Gender reassignment	As there are no known specialist VCS organisations working with this protected characteristic group, the likelihood of this group being impacted by the policy is low. If they are impacted, the severity will be equal to that of all other protected characteristic groups.	With regard to rent subsidy, the council may apply extra priority under this policy if it considers that the organisation delivers a critical service. In addition, the Communities Team provide support and guidance on accessing funding opportunities.	Simon Bashford	During the duration of this policy
Sexual orientation	As there are no known specialist VCS organisations working with this protected characteristic group, the likelihood of this group being impacted by the policy is low. If they are impacted, the severity will be equal to that of all other protected characteristic groups.	With regard to rent subsidy, the council may apply extra priority under this policy if it considers that the organisation delivers a critical service. In addition, the Communities Team provide support and guidance on accessing funding opportunities.	Simon Bashford	During the duration of this policy
Age	A VCS organisation working with this group may lose financial assistance	With regard to rent subsidy, the council may apply extra priority under	Simon Bashford	During the duration of this policy

Equality Analysis

	in the circumstances described in section 3.1.	this policy if it considers that the organisation delivers a critical service. In addition, the Communities Team provide support and guidance on accessing funding opportunities.		
Religion or belief	A VCS organisation working with this group may lose financial assistance in the circumstances described in section 3.1.	With regard to rent subsidy, the council may apply extra priority under this policy if it considers that the organisation delivers a critical service. In addition, the Communities Team provide support and guidance on accessing funding opportunities.	Simon Bashford	During the duration of this policy
Pregnancy or maternity	A VCS organisation working with this group may lose financial assistance in the circumstances described in section 3.1.	With regard to rent subsidy, the council may apply extra priority under this policy if it considers that the organisation delivers a critical service. In addition, the Communities Team provide support and guidance on accessing funding opportunities.	Simon Bashford	During the duration of this policy
Marriage/civil partnership	As there are no known specialist VCS organisations working with this protected characteristic group, the likelihood of this group being impacted by the policy is low. If they are impacted, the severity will be equal to that of all other protected characteristic groups.	With regard to rent subsidy, the council may apply extra priority under this policy if it considers that the organisation delivers a critical service. In addition, the Communities Team provide support and guidance on accessing funding opportunities.	Simon Bashford	During the duration of this policy

6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter X in column 3 (Conclusion) alongside the relevant statement to show your conclusion.		
Decision	Definition	Conclusion - Mark 'X' below
No major change	<p>Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</p> <p>It is not expected that those of a particular protected characteristic will be disadvantaged by this policy. On the contrary, they are likely to benefit, as the effect of this policy is to target premises related support more effectively at organisations that support priority outcomes in the VCS strategy. Nonetheless, as the policy will allow financial assistance to be distributed more broadly across VCS organisations without increasing the overall amount of funding provided, it is possible that in certain circumstances some support currently given to a larger organisation may be directed to a smaller organisation in greater need. It is not, however, expected that there will be a disproportionate number of VCS organisations who lose out which work with a single protected characteristic group. The analysis identified groups which were unlikely to be adversely affected by the change as they do not currently receive financial assistance.</p>	X
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form	
Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	

Equality Analysis

Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet	Meeting title: Cabinet Date: 20 th January 2020
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7. Sign-Off

Officers that must approve this decision	
Equalities Lead	Name: Yvonne Okiyo Date: 17.12.19 Position: Equalities Manager
Director	Name: Gavin Handford Date: 19.12.19 Position: Director Policy and Partnership

REPORT TO:	CABINET 20 JANUARY 2019
SUBJECT:	STAGE 1: RECOMMENDATIONS ARISING FROM SCRUTINY
LEAD OFFICERS:	JACQUELINE HARRIS BAKER, EXECUTIVE DIRECTOR - RESOURCES STEPHEN ROWAN – HEAD OF DEMOCRATIC SERVICES & SCRUTINY
LEAD MEMBER:	COUNCILLOR SEAN FITZSIMONS CHAIR, SCRUTINY AND OVERVIEW COMMITTEE
WARDS:	ALL
CORPORATE PRIORITY/POLICY CONTEXT:	THE CONSTITUTIONAL REQUIREMENT THAT CABINET RECEIVES RECOMMENDATIONS FROM SCRUTINY COMMITTEES AND TO RESPOND TO THE RECOMMENDATIONS WITHIN TWO MONTHS OF THE RECEIPT OF THE RECOMMENDATIONS.
<p>The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations contained within this report:</p> <p>1. RECOMMENDATIONS</p> <p>Cabinet is asked to:</p> <p>1.1 Receive the recommendations arising from the Scrutiny & Overview Committee (29 October 2019) and Children & Young People Sub-Committee (5 November 2019), and to provide a substantive response within two months (i.e. at the next available Cabinet meeting on 23 March 2020)</p>	

2. EXECUTIVE SUMMARY

- 2.1 Recommendations that have been received from the Scrutiny and Overview Committee and its Sub-Committees since the last Cabinet meeting are provided in Appendix 1. The constitution requires that an interim or full response is provided within 2 months of this Cabinet meeting.

3. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 3.1 There are no financial implications arising directly from the contents of this report.

4. LEGAL CONSIDERATIONS

- 4.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that the recommendations are presented to Cabinet in accordance with the Constitution.
- 4.2 This requires that the Scrutiny report is received and registered at this Cabinet Meeting and that a substantive response is provided within 2 months (i.e. **Cabinet, 23 March 2020** is the next available meeting).

Approved by Sandra Herbert, Head of Litigation & Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer

CONTACT OFFICER:

Simon Trevaskis, Senior Democratic
Services & Governance - Scrutiny
T: 020 8726 6000 X 64840
Email: simon.trevaskis@croydon.gov.uk

APPENDICES:

Appendix 1 – Recommendations from
Scrutiny

BACKGROUND DOCUMENTS:

Background document 1: Report to Scrutiny & Overview Committee on 29 October 2019.

<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=166&MId=1939&Ver=4>

Background document 2: Report to Children & Young People Sub-Committee on 5 November 2019

<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=167&MId=1974&Ver=4>

Scrutiny Recommendations: Stage 1

Committee	Meeting Date	Agenda Item	Conclusion	Recommendation	Cabinet Lead	Officer Lead
Scrutiny & Overview	29/10/19	Delivery of the Growth Zone	Given the scale and importance of the Growth Zone project the Scrutiny & Overview Committee agreed that the potential risks to the delivery of the project should be monitored through a project specific risk register.	That a risk register be developed and maintained specifically for the risks associated with the Growth Zone project.	Stuart King/Paul Scott/Manju Shahul-Hameed	Stephen Tate
Children & Young People Sub-Committee	5/11/2019	Children's Improvement Plan 2019/20	The Sub-Committee would welcome the opportunity to be able to influence and add value to the work of the Children's Improvement Board	That the Executive Director for Children Families and Education and Chair of the Children's Improvement Board work with the Chair and Vice Chair of the Sub-Committee on the future work programme for Scrutiny.	Alisa Flemming	Robert Henderson

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REPORT TO:	Cabinet 20 January 2020
SUBJECT:	STAGE 2: RESPONSE TO RECOMMENDATIONS ARISING FROM: SCRUTINY & OVERVIEW COMMITTEE ON 2 SEPTEMBER 2019, SCRUTINY & OVERVIEW COMMITTEE ON 10 SEPTEMBER 2019, STEETS, ENVIRONMENTS & HOMES SCRUTINY SUB-COMMITTEE ON 1 OCTOBER 2019 AND CHILDREN & YOUNG PEOPLE SCRUTINY SUB-COMMITTEE ON 5 NOVEMBER 2019.
LEAD OFFICERS:	Jacqueline Harris Baker, Executive Director of Resources and Monitoring Officer Stephen Rowan, Head of Democratic Services and Scrutiny
CABINET MEMBERS:	All
WARDS:	All
CORPORATE PRIORITY/POLICY CONTEXT:	The constitutional requirement that Cabinet receives recommendations from scrutiny committees and to respond to the recommendations within two months of the receipt of the recommendations.

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below:

1. RECOMMENDATIONS

- 1.1 Cabinet is recommended to approve the response and action plans attached to this report at Appendix 1 and that these be reported to the Scrutiny and Overview Committee or relevant Sub-Committees.

2. EXECUTIVE SUMMARY/DETAIL

- 2.1 This report asks the Cabinet to approve the full response reports arising from the Stage 1 reports presented to the Cabinet meeting held on 18 November 2019 including:

- Action plans for the implementation of agreed recommendations, or
- Reasons for rejecting the recommendations

and that these be reported to the Scrutiny and Overview Committee or relevant Sub-Committees.

- 2.2 The Constitution requires that in accepting a recommendation, with or without amendment, from a Scrutiny and Overview Committee or Sub-Committee, the Cabinet shall agree an action plan for the implementation of the agreed recommendations and shall delegate responsibility to an identified officer to report back to the Scrutiny and Overview Committee or Sub-Committee, within a specified period, on progress in implementing the action plan.

3. SCRUTINY RECOMMENDATIONS

- 3.1 The Scrutiny recommendations are contained in the schedule in the appendix to this report.
- 3.2 The detailed responses including reasons for rejected recommendations and action plans for the implementation of agreed recommendations are contained in the appendices.

4. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 4.1 The recommendations in this report may have a financial implication and as each recommendation is developed the financial implication will be explored and approved.

Approved by: Lisa Taylor, Director of Finance, Investment & Risk.

5. LEGAL CONSIDERATIONS

- 5.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that the Constitution requires that Cabinet both receives recommendations from Scrutiny Committees and responds to the recommendations within two months of their receipt.

Approved by: Sandra Herbert Head of Litigation and Corporate Law on behalf of the Director of Law and Governance and Deputy Monitoring Officer.

6. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 6.1 These are contained in the appendix to this report.

7. OPTIONS CONSIDERED AND REJECTED

- 7.1 These are contained in the appendix to this report.

CONTACT OFFICER:

Stephen Rowan, Head of Democratic Services
and Scrutiny
T: 020 8726 6000 X 62529
Email: stephen.rowan@croydon.gov.uk

APPENDICES:

Appendix 1 – Scrutiny Stage 2 Responses

BACKGROUND DOCUMENTS:

Background document 1: Report to Scrutiny & Overview Committee on 2 September 2019.

<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=166&MId=2086&Ver=4>

Background document 2: Report to Scrutiny & Overview Committee on 10 September 2019.

<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=166&MId=1938&Ver=4>

Background document 3: Report to Steets, Environments & Homes Scrutiny Sub-Committee on 1 October 2019.

<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=170&MId=1978&Ver=4>

Background document 4: Report to Children & Young People Scrutiny Sub-Committee on 5 November 2019.

<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=167&MId=1974&Ver=4>

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SCRUTINY RECOMMENDATION	CONCLUSIONS	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPT/ REJECT RECOMMENDATIONS (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
Report: Call-in: Objections to Emissions Based Parking Charges and Diesel Surcharges for Permits (Considered by the Scrutiny & Overview Committee on 2 September 2019)							
1. That the possibility of allowing payment for parking permits in instalments be explored.	That it may help to mitigate against the increased cost for a parking permit if a system could be put in place to allow for payment in instalments.	Councillor Stuart King/ Paul Scott (Job Share) Place	Accept	Steve Iles	Not yet known.	May 2020 - The service will be reviewing its back office processing system.	TBC
Report: Report of the Chief Executive (Considered by the Scrutiny & Overview Committee on 10 September 2019)							
1. That consideration be given to appointing a sponsor for cultural change in the Executive Management Team.	Having raised similar concerns during its review of the Council's Digital Strategy, the Committee agreed that resistance to cultural change remained a key risk for any new corporate initiatives and felt that having a sponsor for cultural change within the Executive Management Team would begin to address this issue.	Councillor Simon Hall Resources	The oversight of cultural change sits collectively at ELT as a senior leadership key accountability. All of the Executive Directors attend the Culture Board as part of this responsibility.	Jo Negrini	N/A	N/A	TBC
Report: Question Time: Cabinet Member for Finance & Resources (Considered by the Scrutiny & Overview Committee on 10 September 2019)							
1. That a written report setting out an overview of their portfolio along with key performance data be submitted in addition to a presentation by Cabinet Members for their Question Time sessions with the Scrutiny and Overview Committee and its Sub-Committees.	The Committee was disappointed that a detailed report had not been provided and as such concluded that it had been difficult to reach any further clarity on the budget setting process. It was agreed that a recommendation reminding Cabinet Members of the need to provide a written report in addition to a presentation would be made.	All Cabinet Members Chief Executive's Office	Accept	Jo Negrini	N/A	For next Question Time.	10 February 2020

SCRUTINY RECOMMENDATION	CONCLUSIONS	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPT/ REJECT RECOMMENDATIONS (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
2. That information be included on spending power along with grant funding figures in future updates to the Committee.	It was agreed that it would be useful to request further information on spending power as well as grant funding figures in future updates from the Cabinet Member for Finance and Resources.	Councillor Simon Hall Resources	Accept	Lisa Taylor	N/A	The 2020/2021 budget will be presented to Scrutiny and Overview Committee on the 14th January 2020. This is ahead of approval by Cabinet and full council in February 2020.	14 January 2020
Report: Call In: Proposed Closure of St Andrew's Church of England High School (Considered by the Scrutiny & Overview Committee on 17 September 2019)							
1. a. A formal commitment be made to ensure that the whole site was retained for educational use. b. That a commitment be made to utilise the Local Plan to ensure that the land remained allocated for educational use.	It was regrettable and sad that the school was closing during a period of population growth in Croydon.	Councillor Alisa Flemming Children Families and Education	Accept	Rob Henderson	The council would be responsible for maintenance of the school building if agreement was reached with the Diocese to utilize the site in the short term.	The Diocese is the decision maker on the future use of site as the Diocese owns the site (excluding the playing fields which are owned by the council). The Diocese gave their commitment that the site will be retained for educational use to ensure number and proportionality of church school places in Croydon.	TBC
2. That the Council work with the Diocesan to produce an ongoing plan to raise capital through the short term use of the building.	It was regrettable that the funding system for schools made it difficult for smaller schools to function effectively and remain in operation.	Councillor Alisa Flemming Children Families and Education	Accept	Rob Henderson	The Diocese would charge the council a peppercorn rent to help offset the school's deficit which would be absorbed by the council.	Discussions are underway with the Diocese and due diligence checks are being undertaken by Croydon regarding utilising the site for a period of 3 to 4 years for educational use. The Council is leading a Task and Finish Group with the Diocese and the School/Governing Board. The group is responsible for coordinating and implementing a closure	TBC

SCRUTINY RECOMMENDATION	CONCLUSIONS	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPT/ REJECT RECOMMENDATIONS (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
						plan for the successful closure of St Andrew's CofE High School by 31st August 2020.	
Report: South London Waste Partnership (Considered by the Streets Environment & Homes Sub-Committee on 1 October 2019)							
1. Recommend that any data presented in future reports be contextual over a longer period than 3 months with comparative data with other boroughs.	The data evidence supplied in the report was not sufficient to enable detailed analysis of the performance of Veolia	Councillor Stuart Collins Place	Accept	Steve Iles	N/A	The service will work with scrutiny to ensure all Data requirements for future Scrutiny meetings will be clarified as part of the scrutiny brief.	17 March 2020
2. Recommend that Veolia staff working in the community report incidences of flytipping and street cleansing if and when observed.	It was important to explore different ways to encourage the reporting of street cleansing issues.	Councillor Stuart Collins Place	Accept	Steve Iles	N/A	This is currently happening although there is work to do in improving the consistency of reporting across all staff.	17 March 2020
3. Recommend that improved means of communications be explored to ensure that residents and businesses were made aware of work that was being carried out as well as any changes.	More work was needed to improve methods of communication with the wider community.	Councillor Stuart Collins Place	Accept	Steve Iles	Not yet known.	Ongoing - the service will work closely with scrutiny to seek clarity where Scrutiny feel this has not been the case.	17 March 2020
4. Recommend that the information on the FAQ's page on the Council website be reviewed on a regular basis and kept up to date.	It was important that the Council ensure that its webpages contain up to date information.	Councillor Stuart Collins Place	Accept	Steve Iles	N/A	Ongoing.	17 March 2020

SCRUTINY RECOMMENDATION	CONCLUSIONS	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPT/ REJECT RECOMMENDATIONS (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
5. Recommend that the Council lobby government to develop new recycling infrastructure to combat the shipping of waste, in particular plastic to other countries.	The Sub-Committee recognised the need for a wider government response to the shipping of waste.	Councillor Stuart Collins Place	Accept	Steve Iles	N/A	January 2020.	17 March 2020
Report: Question Time: Cabinet Member for Clean Green Croydon (Considered by the Streets Environment & Homes Sub-Committee on 1 October 2019)							
1. Recommend that the Cabinet Member for Clean Green Croydon ensure that a representative from Viridor attend a future meeting.	There were many questions regarding emissions, pollution and the monitoring of air quality that could only be answered in detail by Viridor.	Councillor Stuart Collins Place	Accept	Steve Iles	N/A	Cabinet member will invite a representative from both the SLWP and Viridor to a future meeting to be confirmed.	17 March 2020
2. Recommend that as part of the steps being taken to encourage waste minimisation, an initiative to promote increased bottle reuse amongst council staff be explored.	The steps being taken to promote waste minimisation were encouraging.	Councillor Stuart Collins Place	Accept	Steve Iles	Yes - c £20k required.	N/A	17 March 2020
3. Recommend that software integration be made a priority to ensure that fundamental improvements are made to the interface between the Council's systems and Veolia's.	The interface between Veolia and the Councils reporting system was poor and required more work to ensure that information was being shared.	Councillor Stuart Collins Place	Reject - the council's and Veolia's systems are integrated, but we will continue to work with the Digital Team to improve the user experience.	Steve Iles	Yes - TBC	Ongoing.	17 March 2020

SCRUTINY RECOMMENDATION	CONCLUSIONS	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPT/ REJECT RECOMMENDATIONS (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
4. Recommend that the Cabinet Member for Clean Green Croydon explore ways to maximise the operational model of the free bulky waste service in order to make it more cost effective.	Assurances given on the continuity of the free bulky waste service was welcomed.	Councillor Stuart Collins Place	Reject - It is unclear what this recommendation is seeking to achieve. Bulky waste collections are booked via an online booking system which has allotted days depending on where the property is within the borough.	Steve Iles	N/A	N/A	17 March 2020
5. Recommend that all Cabinet Members to continue to lobby Government to legislate on various environmental issues where appropriate.	It was important that the government lends it support to local authorities by rolling out initiatives nationally and legislating on various recycling initiatives as has been done in some European countries.	Councillor Stuart Collins Place	Accept	Steve Iles	N/A	Ongoing.	17 March 2020
Report: Interim Report of the Task and Finish Group: Exclusions and Offrolling in Croydon Schools (Considered by the Children & Young People Sub-Committee on 5 November 2019)							
1. That the Cabinet be recommended to: a) endorse the Statutory Guidance on Overview and Scrutiny in Local Government and Combined Authorities, which included the need for local authorities to ensure that support is provided for scrutiny to ensure it has a profile in the wider community; and	It was disappointing to note that the work of the Task and Finish Group had been delayed due to the lack of communications and engagement support for the consultation process of the Review.	Councillor Simon Hall Resources	a) Accept	Hazel Simmonds	N/A	N/A	TBC

SCRUTINY RECOMMENDATION	CONCLUSIONS	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPT/ REJECT RECOMMENDATIONS (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
b) that communication and engagement resources are made available to support the work of Scrutiny.			b) Accept subject to resource constraints				

REPORT TO:	CABINET 20 JANUARY 2020
SUBJECT:	INVESTING IN OUR BOROUGH
LEAD OFFICER:	SARAH WARMAN, DIRECTOR OF COMMISSIONING & PROCUREMENT JACQUELINE HARRIS-BAKER, EXECUTIVE DIRECTOR RESOURCES
CABINET MEMBER:	COUNCILLOR SIMON HALL CABINET MEMBER FOR FINANCE AND RESOURCES
WARDS:	ALL
<p>CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON: Effective outcome based commissioning and prudent financial transactions contribute to all corporate priorities.</p> <p>The Council's Commissioning Framework (2019 – 2023) sets out the approach to commissioning and procurement and puts delivery of outcomes at the heart of the decision making process. As the Council develops more diverse service delivery models, it is important to ensure that our contractual and partnership relationships are not only aligned to our corporate priorities but also represent value for money for citizens and taxpayers, contributing to the growth agenda for Croydon.</p>	
<p>FINANCIAL SUMMARY: There are no direct costs arising from this report.</p>	
<p>KEY DECISION REFERENCE NO.: There are key decisions mentioned in this report, but approval of the Recommendations would not constitute a key decision.</p>	

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1 RECOMMENDATIONS

1.1. The Cabinet is requested to approve:

1.1.1. The contract variation award for Timebridge Community Centre at a maximum contract value of £5,807,247, an increase by £1,807,247, over a term of 19 months as set out at agenda item 14a.

1.2. The Cabinet is requested to note:

1.2.1. The contracts over £500,000 anticipated to be awarded by the nominated Cabinet Member, in consultation with the nominated Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources, in consultation with the Leader, as set out in section 4.2.1.

- 1.2.2. The list of delegated award decisions made by the Director of Commissioning and Procurement, between 16/11/2019 – 17/12/2019, as set out in section 4.2.2.
- 1.2.3. The list of delegated award decisions for contracts over £500,000 in value made by the nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet, as set out in section 4.2.3.
- 1.2.4. Property acquisitions and disposals agreed by the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet, as set out in section 4.3.

2 EXECUTIVE SUMMARY

2.1 This is a standard report which is presented to the Cabinet, for information, at every scheduled Cabinet meeting to update Members on:

- Contract awards and strategies to be agreed by the Cabinet at this meeting which are the subject of a separate agenda item;
- Contracts anticipated to be awarded under delegated authority from the Leader by the nominated Cabinet Member, in consultation with the Cabinet Member for Finance and Resources and with the Leader in certain circumstances, before the next meeting of Cabinet;
- Delegated contract award decisions under delegated authority from the Leader by the Nominated Cabinet Member for Safer Croydon & Communities or Cabinet Member for Families, Health & Social Care in consultation with the Cabinet Member for Finance & Resources related to the Community Fund Commissioning Programme;
- Delegated contract award decisions made by the Director of Commissioning and Procurement 16/11/2019 – 17/12/2019;
- Property lettings, acquisitions and disposals agreed by the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet;
- Delegated contract award decisions under delegated authority from the Leader by the Nominated Cabinet Member for Families, Health & Social Care in consultation with the Cabinet Member for Finance & Resources related to the Adult and Young People Social Care Dynamic Purchasing Systems (DPS);
[As at the date of this report there are none].

- Delegated contract award decisions under delegated authority from the Leader by the Nominated Cabinet Members for Finance and Resources & for Children, Young People & Learning related to the new Addington Valley SEN School;
[As at the date of this report there are none].
- Partnership arrangements to be agreed by the Cabinet at this meeting which are the subject of a separate agenda item.
[As at the date of this report there are none].

3 DETAIL

- 3.1 Sections 4.1 of this report list those contracts that are anticipated to be awarded or approved by the Cabinet.
- 3.2 Section 4.2.1 of this report lists those contracts that are anticipated to be awarded by the nominated Cabinet Member.
- 3.3 Section 4.2.2 of this report lists the delegated award decisions made by the Director of Commissioning and Procurement, between 16/11/2019 – 17/12/2019.
- 3.4 Section 4.2.3 of this report lists the delegated decisions made by the Nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet.
- 3.5 Section 4.3 of this report lists the property lettings, acquisitions and disposals agreed by the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet.
- 3.6 The Council's Procurement Strategy and Tender & Contracts Regulations are accessible under the Freedom of Information Act 2000 as part of the Council's Publication Scheme. Information requested under that Act about a specific procurement exercise or contract held internally or supplied by external organisations, will be accessible subject to legal advice as to its commercial confidentiality, or other applicable exemption, and whether or not it is in the public interest to do so.

4 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

4.1 Proposed contract awards

- 4.1.1 Revenue and Capital consequences of contract award decisions to be taken by Cabinet which are the subject of a separate agenda item.

Contract Title	Contract Revenue Budget	Contract Capital Budget	Dept/Cabinet Member
Timebridge Community Centre Contract Variation		£5,807,247 (Contract length 18 months) (Increase of £1,807,247)	Environment, Transport and Regeneration / Cllr King/Scott (job share)

4.2 Contract Awards

4.2.1 Revenue and Capital consequences of contract award decisions to be made between £500,000 to £5,000,000 by the nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources, in consultation with the Leader.

Contract Title	Contract Revenue Budget	Contract Capital Budget	Dept/Cabinet Member
Housing and Housing Assets ICT Management System		£1,599,340 (Contract length 3 + 1 years)	Finance and Resources / Cllr Hall
My Resources Oracle Cloud ERP system third line support services contract award	£206,050 (Contract length 2 years)	£418,450	Finance and Resources / Cllr Hall

4.2.2 Revenue and Capital consequences of delegated decisions made by the Director of Commissioning and Procurement for contract awards (Regs. 19, 28.3 a & b) between £100,000 & £500,000 and contract extension(s) previously approved as part of the original contract award recommendation (Reg. 28.4 d) and contract variations (Reg.30).

Contract Title	Contract Revenue Budget	Contract Capital Budget	Dept/Cabinet Member
Fire Risk Assessments Contracts Awards		£170,000 (Contract length 9 months)	Homes and Gateway Services / Cllr Butler

Contract Title	Contract Revenue Budget	Contract Capital Budget	Dept/Cabinet Member
Special Sheltered Housing – Furniture Contract Award		£100,000 (Contract length 3 months)	Homes and Gateway Services / Cllr Butler

CONTRACT VARIATIONS & EXTENSIONS					
Contract Title	Value of Contract to Date	Value of Extension Term	Total Revenue value including extension term	Contract Capital Budget	Dept/Cabinet Member
South London Coroners Service	£93,259	£99,085 (2 +2 years extension)	£192,344		Finance and Resources / Cllr Hall
Croydon Growth Zone Navigation App	£115,000	£58,875 (36 month extension)		£173,875	Environment, Transport & Regeneration / Cllr King/Scott (job share)
Croydon Area Remodelling Scheme – Appointment of London Continental Railways (LCR)	£91,300	£283,825 (11 month extension)		£375,125	Environment, Transport & Regeneration / Cllr King/Scott (job share)
Extra Care Housing IT system contract variation	£48,326.5	£161,576.5 (3 years extension)	£209,903		Finance and Resources / Cllr Hall

4.2.3 Delegated award decisions for contracts over £500,000 in value made by the nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet.

Contract Title	Contract Revenue Budget	Contract Capital Budget	Dept/Cabinet Member
Community Fund Commissioning Programme	£7,115,530 (Contract length 3 years)		Safer Croydon & Communities / Cllr Ali

4.3 Property Acquisitions and Disposals

- 4.3.1 Revenue and Capital consequences of property lettings, acquisitions and disposals over £500,000 to be agreed by the Cabinet Member for Finance and Resources in consultation with the Leader of the Council.

Title	Lettings	Disposals	Acquisitions	Dept/Cabinet Member
Purchase of 24 Affordable Housing properties at Longheath Gardens for retention in the Housing Revenue Account			£3,600,000	Finance & Resources / Cllr Hall

Approved by: Ian Geary, Head of Finance - Resources on behalf of Lisa Taylor, Director of Finance, Investment and Risk and Section 151 Officer.

5 LEGAL CONSIDERATIONS

- 5.1 The Director of Law and Governance comments that the information contained within this report is required to be reported to Members in accordance with the Council's Tenders and Contracts Regulations and the council's Financial Regulations in relation to the acquisition or disposal of assets.

Approved by: Sean Murphy, Director of Law and Governance and Deputy Monitoring Officer.

6 HUMAN RESOURCES IMPACT

- 6.1 There are no immediate HR issues that arise from the strategic recommendations in this report for LBC staff. Any specific contracts that

arise as a result of this report should have their HR implications independently assessed by a senior HR professional.

Approved by: Sue Moorman, Director of Human Resources

7 EQUALITY IMPACT

- 7.1 An Equality Analysis process has been used to assess the actual or likely impact of the decisions related to contracts mentioned in this report and mitigating actions have been defined where appropriate.
- 7..2 The equality analysis for the contracts mentioned in this report will enable the Council to ensure that it meets the statutory obligation in the exercise of its functions to address the Public Sector equality duty (PSED). This requires public bodies to ensure due regard to the need to advance equality of opportunity; foster good relations between people who share a “protected characteristic” and those who do not and take action to eliminate the potential of discrimination in the provision of services.
- 7..3 Any issues identified through the equality analysis will be given full consideration and agreed mitigating actions will be delivered through the standard contract delivery and reporting mechanisms.

8 ENVIRONMENTAL IMPACT

- 8.1 Any issues emerging in reports to the relevant Cabinet member will require these considerations to be included as part of the standard reporting requirements, and will not proceed without full consideration of any issues identified.

9 CRIME AND DISORDER REDUCTION IMPACT

- 9.1 Any issues emerging in reports to the relevant Cabinet Member will require these considerations to be included as part of the standard reporting requirements, and will not proceed without full consideration of any issues identified.

10 DATA PROTECTION IMPLICATIONS

- 10.1 Will the subject of the report involve the processing of ‘personal data’?

NO

Has a Data Protection Impact Assessment (DPIA) been completed?

NO

Data Protection Impact Assessments has been used to assess the actual or likely impact of the decisions related to contracts mentioned in this report and mitigating actions have been defined where appropriate.

Approved by: Sarah Warman, Director of Commissioning & Procurement

CONTACT OFFICER:

Name:	Bianca Byrne
Post title:	Head of Commissioning and Procurement (Corporate)
Telephone no:	63138

BACKGROUND DOCUMENTS:

The following public background reports are not printed with this agenda, but are available as background documents on the Croydon Council website agenda which can be found via this link [Cabinet agendas](#)

- Housing and Housing Assets ICT Management System
- My Resources Oracle Cloud ERP system third line support services contract award
- Purchase of 24 Affordable Housing properties at Longheath Gardens for retention in the Housing Revenue Account

REPORT TO:	Cabinet 20 January 2020
SUBJECT:	Timebridge Community Centre and Fieldway Family Centre Contract Variation
LEAD OFFICER:	Shifa Mustafa Executive Director Place Stephen Tate - Director of District Centres and Regeneration
CABINET MEMBER:	Councillor Stuart King - Cabinet Members for Environment, Transport and Regeneration (job share) Councillor Paul Scott - Cabinet Members for Environment, Transport and Regeneration (job share) and Councillor Simon Hall Cabinet Member for Finance and Resources
WARDS:	New Addington North

CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON

This project supports delivery of the following key themes of the proposed corporate plan 2018-22:

- **One borough – many places:** There is an opportunity for us to provide space for local communities, for new businesses but also for council services. We want to create a network of hubs that support local initiatives and meet local needs. Using our Community Fund and other forms of revenue and grants we can give our local voluntary sector the support it needs to make a real difference.
- **Education and Learning:** We want to work towards a borough that can provide every young person the best possible start and recognizes the different needs and challenges that they all face.
- **A fairer Croydon:** The Opportunity and Fairness Commission provides much that we must still pursue including a commitment to equality of access to education and jobs. We also need to look at how we provide the best possible opportunities for all our communities and celebrate our diversity. We will do this through continued investment in our voluntary sector through the Community Fund in line with the recommendations of the Opportunity and Fairness Commission.

This project, through release of the Timebridge site and relocation of the community facilities to a new modular build, whilst retaining the valued community provisions, will enable the development of a new SEN school for the borough.

FINANCIAL IMPACT

£4m was originally allocated within the Council's Capital Programme Budget. Additional budget of £2,216,000 was secured, therefore the current total approved budget is £6,216,000. The report recommends varying the award of a Design and Build contract for the delivery of the Timebridge Community Centre for an increase maximum contract (2 contracts) value of £6,110,143 inclusive of 5% (£302,896) contingency to be held by the Council.

FORWARD PLAN KEY DECISION REFERENCE NO.: 3118ETR

The notice of the decision will specify that the decision may not be implemented until after 13.00 hours on the 6th working day following the day on which the decision was taken unless referred to the Scrutiny and Overview Committee.

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below:

1. RECOMMENDATIONS

The Cabinet is recommended by the Contracts and Commissioning Board to approve the following contract variations to The McAvoy Group Ltd, in accordance with Regulation 30 of the Council's Tenders and Contracts Regulations and for the reasons detailed within this report:

- 1.1 The Timebridge and Community Centre Design and Construction contract variation for a new maximum contract value of £5,297,860. This new contract value includes a 5% contingency value of £302,896 and the new contract period of 18 months including 12 months defects liability period.
- 1.2 The design and contract of the permanent modular building contract variation for a new maximum contract value of £509,387 for the Fieldway Family Centre.

2. EXECUTIVE SUMMARY

- 2.1 On 26th February 2018, the Cabinet endorsed the recommended Education Estate Capital Programme 2018-21 (ref: A14/18a), as part of the Council's budget setting process. This includes the delivery of a new community centre to replace the existing Timebridge Community Centre at an agreed budget of £4m, to allow for the development of the new SEN school (Addington Valley SEN Free School) to be completed by September 2020.
- 2.2 The Timebridge Community Centre project consists of the following:
 - The construction of a new community building to accommodate the Fieldway Family Centre and Timebridge community centre in Fieldway;

- The demolition of the existing Fieldway family centre;
- Temporary accommodation to house the Fieldway Family Centre during the construction of the new centre.

2.3 Project objectives and ambitions in relation to the Council's policies/priorities:

- The new proposed Community Centre has been designed to offer a central community gateway services hub in Fieldway and New Addington where access to education, health, career and social support can be acquired.
- New Addington and Fieldway are amongst the most deprived areas in the borough. The community centre will enable the Council and the voluntary/community sector to connect and collaborate to tackle challenges including unemployment, crime and anti-social behaviour, deprivation, poverty and homelessness.
- The Centre will be the base for a diverse range of community uses including a nursery, food bank, youth and family Centre and a community café.
- The Family Centre in collaboration with the Council's Gateway division will support the residents and help prevent homelessness and build community resilience through providing various services such as job club, health wellbeing, benefits advice and personal budgeting support.
- In addition, the building includes other flexible spaces for hire such as a multi-purpose hall, two studio spaces, conference and meeting rooms and social and work space.

2.4 Through the above mentioned project objectives, the delivery of the project will support the following key themes of the corporate plan 2018-2022:

- **One borough – many places:** There is an opportunity for us to provide space for local communities, for new businesses but also for council services. We want to create a network of hubs that support local initiatives and meet local needs. Using our Community Fund and other forms of revenue and grants we can give our local voluntary sector the support it needs to make a real difference.
- **A fairer Croydon:** The Opportunity and Fairness Commission provides much that we must still pursue including a commitment to equality of access to education and jobs. We also need to look at how we provide the best possible opportunities for all our communities and celebrate our diversity. We will do this through continued investment in our voluntary sector through the Community Fund in line with the recommendations of the Opportunity and Fairness Commission.

- 2.5 The purpose of this report is to approve the recommendation to vary the original contracts with the McAvoy Group Ltd, from the original contract value of £4,000,000 to a new contract value of £5,807,246 in addition to 5% contingency valued at £302,896.
- 2.6 The content of this report has been endorsed by the Contracts and Commissioning Board.

CCB ref. number	CCB Approval Date
CCB1532/19-20	02/12/2019

3. DETAIL

- 3.1 The original approved award report (CCB1392/18-19) recommended the award of contract for the design and build of the new Timebridge Community Centre to the McAvoy Group Ltd for a maximum contract value of £4m, inclusive of the option to incorporate a temporary modular build to facilitate decant of the existing facilities at an estimated value of £200,000 subject to project requirements and funding being agreed.
- 3.2 The original award report of £4,000,000 was for one contract for both the main Timebridge Community Centre and the temporary modular. The route of awarding this contract was via direct award through the LHC Framework and using the NEC4 ECC Option A form of contract. Following the award and due to changes in the timing of the project the two elements were split under two contracts instead of one. Following the same award route and form of contract.
- 3.3 On 14th November 2018 Growth Board approved further funding of £1,413,000 which was subsequently approved by Cabinet in February 2019. The additional funding was to cover:
- Expanding the scope to include the Fieldway Family Centre into the redevelopment of new facilities. This has led to an increase in the building floor area by circa 225m².
 - Providing a temporary facility to accommodate the Family Centre during the construction of the new centre.
 - Introducing some design changes including an increase to the building footprint and improved materiality of the building following collaborative design workshops with the planning officers and the inclusion of recommendations from the Place Review Panel.
- 3.4 Subsequently on 4th July 2019, senior management including Head of Finance agreed to an additional funding of £1,160,000 to cover:

- Purchase of Fieldway Family Centre temporary accommodation for a cost of circa £534,000 (of which £509,000 are related to this contract award), increased from £350k hire cost (was planned to accommodate the Boxing Club permanently).
- The full RIBA stage 4 Contractor's proposals for the **proposed Design and construction** cost of £5,598,000 (an increase of approximately £741,000 from the previous submitted RIBA Stage 3 Design and Construction cost of £4,857,000).

3.5 Overview of the detailed breakdown of the costs:

Item	Cost
Design and Construction costs	£5,297,860
Permanent Modular building Design and construction	£509,387
Contingency (5%)	£302,896
Total Report Award Value	£6,110,143

Other project associated costs:

Item	Cost
Project Management fees	£64,964
Planning	£26,520
Family Centre decant fees	£15,429
Building Control	£3,000
Legal fees	£2,000
Surveys and other miscellaneous costs	£138,764
Total	£250,677

3.6 The reason behind the increase in construction costs is outlined below:

- The costs of the mechanical and electrical, substructure, external works and internal finish elements have increased from the original estimated contractor's costs from stage RIBA 3 to RIBA Stage 4. The original costs were based on the London Housing Consortium (LHC) framework rates, however following supply chain engagement and obtaining three comparable quotes for those elements from subcontractors, it was found that the LHC rates do not represent the current market rates.
- It is important to note that the contractor's cost proposal is subject to an open book tendering procedure, where the contractor submits all the quotes from the subcontractors and those were reviewed by the appointed independent cost consultant on this project.

3.7 Under regulation 72 of the PCR 2015, the risk of challenge as a result of this variation is low. As this falls under 72. (b) Additional works, by the original contractor that have become necessary and were not included in the initial

procurement. A change of contractor at this stage would cause significant inconvenience and substantial duplication of costs for the Council.

- 3.8 The delivery of the contracts will be managed by the Capital Delivery (HSIS) team in accordance with the Council's contract management framework. The progress of delivering this contract will be reported on a monthly basis to the Growth Board.

4. CONSULTATION

- 4.1 The main driver for this project was the adopted Croydon Local Plan 2018, in which the Timebridge site was re-designated for educational use. In preparing the Croydon Local Plan 2018, the Council has worked with partners and interested parties to devise policies and proposals that it thinks will best address the needs of the borough up to 2036. The strategic policies have been subject to four periods of consultation.
- 4.2 The consultation for the development of the Timebridge community centre has been undertaken and included the Local Community Groups, who are currently using the existing Timebridge Centre and Fieldway Family Centre. The consultation took the form of an information event where the proposed design for the community centre was presented to the local community to take any feedback or comments.

5 PRE-DECISION SCRUTINY

- 5.1 This report has not gone to a Scrutiny meeting.

6. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

6.1 Revenue and Capital consequences of report recommendations

	Previous Year	Current Year		
	2018/19	2019/20	2020/21	2021/22
	£'000	£'000	£'000	£'000
Capital Budget available				
Expenditure	4,000	5,514	600	
Effect of decision from report				
Expenditure	702	4,914	600	
Remaining budget	3,298	600	0	

6.2 The effect of the decision

This decision will commit the Council to a total sum of £6,110,142 (inclusive of 5% contingency) which can be met from the capital budget. The table above shows that the budget as at the end of 2019/2020 will be carried forward into the following financial year.

6.3 Risks

The following risks have been identified and are being actively managed:

Risk	L	I	Mitigations
Programme of works takes longer than anticipated.	M	M	Contract Period reflects the programme requirements. Effective change management will ensure works are delivered within the agreed timeframe. The Contract includes Liquidated Damages for late completion.
PCR 2015 procurement challenge due to the proposed variation.	L	M	The proposed variation reflects a contract value increase of 45.18% which is considered not to be substantial material change. The proposed variation is still within scope of the original direct award of contract in accordance with the LHC framework agreement.

6.4 Options

Ref	Short Description	Main Advantages	Main Weaknesses
1	Do nothing	No costs associated with this option	<p>The useful life of the Asset is expiring and doesn't offer fit for purpose facilities to the local community</p> <p>Doesn't allow for the optimum master plan of the site to be delivered in relation to the new SEN school.</p> <p>This option is not recommended.</p>
2	Transfer Timebridge Centre Community groups to an existing Council asset	<p>Less funding required.</p> <p>Faster route to deliver the project.</p>	<p>There isn't an available asset in Fieldway/ New Addington to accommodate the current activities in the community centre.</p> <p>This option is not recommended.</p>

Ref	Short Description	Main Advantages	Main Weaknesses
3	Build a new community centre	Offers a purpose built facility to the local community. Allows for the optimum development of the Timebridge site along with the free SEN school	Requires a £5.8m capital cost. This option is recommended.

6.5 Future savings/efficiencies

The building has been designed to meet BREEAM 'Excellent', the building is therefore designed to be energy efficient and low maintenance which will minimize on going energy costs and repair and maintenance costs.

Approved by: Kate Bingham, Head of Finance

7. LEGAL CONSIDERATIONS

- 7.1 The Director of Law comments that there are no additional legal issues directly arising directly from the report.

Approved by Sean Murphy, Director of Law and Governance

8. HUMAN RESOURCES IMPACT

- 8.1 This report does not invoke the effects of the Transfer of Undertakings (Protection of Employment) 2006 and no Human Resource impact for Council staff.

Approved by: Jennifer Sanker on behalf of the Director of Human Resources

9. EQUALITIES IMPACT

- 9.1 The Equality Policy 2016 - 20 sets out the Council's commitment to equality and its ambition to create a stronger, fairer borough where no community is held back. The policy reflects the council's statutory duties under the Equality Act 2010 and is supported by the equality objectives set out in the Opportunity and Fairness Plan 2016-2020.
- 9.2 The equality objectives for 2018-22 are aligned to and will support the delivery of the Council's business outcomes set out in its Corporate Plan particularly in relation to:

- **People live long, healthy, happy and independent lives:** the delivery of this project is an investment in the voluntary and community sector, delivering a high quality purpose built space for the community, voluntary and the Council to work together to reduce inequality and increase the resilience of communities and individuals.
 - **Everyone feels safer in their street, neighbourhood and home:** Creating a welcoming, inclusive and pleasant place in which local people want to live and work and feel safe. The Community Centre will help in bringing people together through a diverse range of activities, increasing the resilience of the local community which in turn will help reduce crimes and anti-social behaviour.
- 9.3 The McAvoy Group Ltd will be required to comply with the CDM Regulations 2015 which includes the obligation to meet the provisions set out in the Equality Act 2010.
- 9.4 The project will give us the opportunity for us to provide space for local communities, for new businesses but also for council services. We want to create a network of hubs that support local initiatives and meet local needs
- 9.5 The community centre will enable the Council and the voluntary and community sector to connect and collaborate to tackle challenges including unemployment, crime and anti-social behaviour, deprivation, poverty and homelessness

Approved by: Yvonne Okiyo, Equalities Manager

10. ENVIRONMENTAL IMPACT

- 10.1 The new building works have been designed to comply with the Council's requirement for BREEAM 'Excellent' and also the London Plan which exceeds the minimum energy efficiency requirements in the latest Building Regulations.
- 10.2 There will be a Site Waste Management Plan for the proposed construction site, to ensure that a minimum of waste is sent to landfill and opportunities for recycling and reusing materials are maximised.
- 10.3 The design of the scheme to date ensures there is no impact on the environment as the following points have been incorporated:
- Identification and promotion of environmental issues.
 - Sustainable solutions are designed into the scheme, and minimises waste, the carbon footprint and resources.
 - Minimises the impact of vibration, and air, light and noise pollution.
 - Protects the ecology, the landscape, wildlife, vegetation and water courses.

11. CRIME AND DISORDER REDUCTION IMPACT

- 11.1 There are no immediate adverse Crime and Disorder impacts arising from this report. However, there is potential for the project to aid in reducing crime and disorder in the locality. The community centre will enable the Council and the voluntary and community sector to connect and collaborate to tackle challenges including unemployment, crime and anti-social behaviour, deprivation, poverty and homelessness.

12. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 12.1 To enable the delivery of Timebridge development which includes the Design and build of the new Addington Valley SEN Free School, to enable the Council to accommodate 150 placements (from age of 2-19) from September 2020. Also, to enable the children and young people with special education needs to be educated within the borough.

13. OPTIONS CONSIDERED AND REJECTED

- 13.1 The Council has considered the option of not proceeding with this however, this would have significant impact on delivering the Timebridge development. This includes the design and build of the new Addington Valley SEN Free School, to enable the Council to accommodate 150 placements from September 2020. It is therefore recommended to approve the award of the following contracts:
- a) the Timebridge Community centre contract (NEC4 ECC) to the McAvoy Group Ltd for a total contract value of £5.297m
 - b) the purchase and adaptation of the current modular units contract (NEC4 - ESSC) short form agreement to the McAvoy Group Ltd for a total contract value of £509k.

14. DATA PROTECTION IMPLICATIONS

- 14.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

NO

- 14.2 **HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

NO. This report does not involve the processing of 'PERSONAL DATA'.

The Director of Council Homes, Districts and Regeneration comments that there are no additional data protection implications arising directly from the report.

For General Release

Approved by: Stephen Tate, Director of Council Homes, Districts,
Regeneration and Growth Zone.

CONTACT OFFICER: Saheed Ullah, Programme Manager

BACKGROUND DOCUMENTS: None

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