



**CABINET
AGENDA**
for the meeting
on
12 October 2022 at
6.30 pm

To: Croydon Cabinet Members:

Mayor Jason Perry
Councillor Jeet Bains
Councillor Jason Cummings
Councillor Maria Gatland
Councillor Lynne Hale
Councillor Yvette Hopley
Councillor Ola Kolade
Councillor Scott Roche
Councillor Andy Stranack

Invited participants: All other Members of the Council

A meeting of the **CABINET** which you are hereby summoned to attend, will be held on **Wednesday, 12 October 2022 at 6.30 pm** in **Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX**

Katherine Kerswell
London Borough of Croydon
Bernard Weatherill House
8 Mint Walk, Croydon CR0 1EA

Democratic Services
democratic.services@croydon.gov.uk
www.croydon.gov.uk/meetings
4 October 2022

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<https://webcasting.croydon.gov.uk/croydon/meetings/14997>

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If you require any assistance, please contact Colin Sweeney 020 8726 6000 x61641.

AGENDA – PART A

1. **Apologies for Absence**

To receive any apologies for absence from Members.

2. **Disclosure of Interests**

Members and co-opted Members of the Council are reminded that, in accordance with the Council's Code of Conduct and the statutory provisions of the Localism Act, they are required to consider **in advance of each meeting** whether they have a disclosable pecuniary interest (DPI), an other registrable interest (ORI) or a non-registrable interest (NRI) in relation to any matter on the agenda. If advice is needed, Members should contact the Monitoring Officer **in good time before the meeting**.

If any Member or co-opted Member of the Council identifies a DPI or ORI which they have not already registered on the Council's register of interests or which requires updating, they should complete the disclosure form which can be obtained from Democratic Services at any time, copies of which will be available at the meeting for return to the Monitoring Officer.

Members and co-opted Members are required to disclose any DPIs and ORIs at the meeting.

- Where the matter relates to a DPI they may not participate in any discussion or vote on the matter and must not stay in the meeting unless granted a dispensation.
- Where the matter relates to an ORI they may not vote on the matter unless granted a dispensation.
- Where a Member or co-opted Member has an NRI which directly relates to their financial interest or wellbeing, or that of a relative or close associate, they must disclose the interest at the meeting, may not take part in any discussion or vote on the matter and must not stay in the meeting unless granted a dispensation. Where a matter affects the NRI of a Member or co-opted Member, section 9 of Appendix B of the Code of Conduct sets out the test which must be applied by the Member to decide whether disclosure is required.

The Chair will invite Members to make their disclosure orally at the commencement of Agenda item 3, to be recorded in the minutes.

3. **Minutes of the Previous Meeting**

To approve as an accurate record, the Part A (open) minutes of the last meeting held on 21 September 2022. **(To Follow)**

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.

5. Scrutiny Stages 1 and 2 (Pages 7 - 30)

Cabinet is invited to consider the attached report, which details recommendations that have been developed by the Council's Scrutiny and Overview Committee and its Sub-Committees since the last Cabinet meeting (Appendix A.) The Constitution requires that an interim or full response is provided within two months of this Cabinet meeting.

Cabinet is also asked to consider the report on the response to the task and finish group in relation to inclusion and exclusion. **(Appendices to Follow).**

6. Tackling Graffiti in Croydon (Pages 31 - 62)

Cabinet is invited to consider the attached report, which presents the Council's approach with an enhanced Graffiti service, which is the fulfilment of a key Manifesto commitment set out by the Executive Mayor.

It also sets out the Council's approach for an increased focus on removing illegal, antisocial, offensive graffiti, including non-offensive graffiti across the borough.

7. Report on the Results of Informal Public Consultations on 11 Healthy School Streets (Pedestrian and Cycle Zone only) (Pages 63 - 156)

Cabinet is invited to consider the attached report, which presents the results of an informal consultation, which sought the public's view on the possible introduction of 11 new Healthy School Streets under Experimental Traffic Management Orders (ETMOs) for a maximum period of 18 months.

The consultation was carried out over a one-month period between 1 July 2022 to 30 July 2022. **(Appendix E to Follow)**

8. Period 5 Financial Performance Report (Pages 157 - 190)

Cabinet is invited to consider the attached report, which provides the Council's annual forecast as at Month 5 (August 2022) for the Council's General Fund (GF), Housing Revenue Account (HRA) and the Capital Programme (CP).

The report forms part of the Council's financial management process for publicly reporting financial performance against its budgets on a monthly basis.

9. Review of Council Tax Support Scheme 2023-2024 (Pages 191 - 206)

Cabinet is invited to consider the attached report, which seeks authorisation to undertake statutory consultation with both the public and the Major Precepting Authorities (the GLA) in respect of proposed changes to Croydon's Council Tax Reduction (Support) Scheme (CTS), which will take effect from 1 April 2023.

10. South London Work and Health Job Entry target (JET) Programme Extension (Pages 207 - 220)

Cabinet is invited to consider the attached report, which seeks approval of the recommendation to vary the existing Contract with Reed in Partnership for the continuation of the WHP until 30 November 2026 and to increase the aggregate value of the Contract to include DWP funding of £3,202,023.36 in respect of WHP and £300,000 for the JETS Programme (the latter programme having been included via previously agreed variations to the Contract).

11. 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.”

PART B AGENDA

12. Exempt Minutes of the Last Meeting

To approve as an accurate record, the exempt minutes of the last meeting of the Cabinet, held on 21 September 2022. **(To Follow)**

13. South London Work and Health (JET) Programme Extension (Pages 221 - 226)

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Agenda Item 5

REPORT TO:	CABINET 12 OCTOBER 2022
SUBJECT:	STAGE 1: RECOMMENDATIONS ARISING FROM SCRUTINY (SEPTEMBER 2022)
LEAD OFFICERS:	JANE WEST - EXECUTIVE DIRECTOR - RESOURCES ADRIAN MAY – INTERIM HEAD OF DEMOCRATIC SERVICES & SCRUTINY
LEAD MEMBER:	COUNCILLOR ROWENNA DAVIS CHAIR, SCRUTINY AND OVERVIEW COMMITTEE
CABINET MEMBER:	JASON PERRY, EXECUTIVE MAYOR OF CROYDON
WARDS:	ALL
FINANCIAL IMPACT The Scrutiny recommendations to the Executive (Appendix A) may have financial implications. Following the recommendations being received at Cabinet, the Executive will identify and consider any financial implications as part of their response. If any recommendation is subsequently progressed for consideration and decision by the Executive Mayor in Cabinet, full financial, legal and equalities implications would be presented.	
FORWARD PLAN KEY DECISION REFERENCE: Not a key decision	

The Executive Mayor has the power to make the decisions set out in the recommendations contained within this report:

RECOMMENDATIONS

The Executive Mayor in Cabinet is asked to:

1. Receive the recommendations arising from the meeting of the Scrutiny & Overview Committee held on 6 September (Appendix A).
2. To provide a substantive response to the recommendations (a Scrutiny Stage 2 Report) within two months (i.e. at the next available Cabinet meeting on 7 December 2022).

2. STAGE 1: RECOMMENDATIONS ARISING FROM SCRUTINY

- 2.1 Recommendations that have been developed from the Scrutiny and Overview Committee and its Sub-Committees since the last Cabinet meeting are provided in Appendix A. The constitution requires that an interim or full response is provided within 2 months of this Cabinet meeting.

3. CONCLUSIONS FROM COMMITTEE/SUB-COMMITTEE MEETINGS

- 3.1 In order to provide additional context for the Cabinet, a summary of the conclusions reached by the Scrutiny & Overview Committee or relevant Sub-Committee follows.

Scrutiny & Overview Committee – 6 September 2022

Community Safety Partnership

- 3.2 Following its review of the Community Safety Partnership, the Committee agreed that it would be supportive of a campaign to de-normalise low level sexual harassment against women, such as ‘cat-calling’, but recognised that any such campaign would be dependent on further resources being identified.
- 3.3 The Committee welcomed confirmation that there would be an emphasis on recording offences in the town centre to provide evidence on the need for the Public Space Protection Order. The Committee also welcomed the proposed review of this scheme in two months to make sure that anti-social behaviour doesn't simply shift to neighbouring areas.
- 3.4 There was a concern about whether there was sufficient coordination of information between the Police and Council, but it was also acknowledged that the attendance of councillors at their local Ward Panel meetings may help to provide reassurance on this concern.
- 3.5 The Committee agreed that the following information would be requested following the meeting:-
- a. Information on the support available for women with no recourse to public funds.
 - b. Clarification on the Council’s policy on police presence in schools and the use of searches.
 - c. Clarification on processes for moving children across borough boundaries.
 - d. The statistics on the number of children subject to managed moves and placements in pupil referral units.

Budget Monitoring – Month 4

- 3.6 The Committee was frustrated that it had only received the report for this item after 6pm the night before the meeting, inhibiting Members' ability to scrutinise the paper with the attention that it deserves.
- 3.7 The Committee was frustrated that significant work was still required before the Council's financial reporting processes could be considered to be at an expected standard. The Cabinet Member for Finance's confirmation that it was likely to be 'two years' before an acceptable standard could be met was concerning. However, confirmation that additional resource had been allocated to embedding the Fusion Oracle system was welcomed.
- 3.8 The Committee welcomed confirmation from the Cabinet Member for Finance that there would be a greater emphasis on transformational projects to deliver the savings required in the 2023-24 and looked forward to reviewing these proposals once they were published in October.
- 3.9 The Committee was supportive of the principle of using capital funds for 'invest to save' schemes that would benefit the revenue budget in the longer term.
- 3.10 The Committee agreed that a report would be added to the Streets, Environment & Homes Sub-Committee work programme to provide further explanation on the Housing Benefit Budget deficit.
- 3.11 The Committee welcomed confirmation that training on the budget scrutiny process would be commissioned for later in the autumn for both officers and scrutiny members.

4. CONSULTATION

- 4.1 The recommendations were developed from the deliberations of either the Scrutiny & Overview Committee or one of its Sub-Committees.

5. PRE-DECISION SCRUTINY

- 5.1 The recommendations set out in the appendix to this report directly arise from Scrutiny.

6. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 6.1 There are no financial implications arising directly from the content of this report. Please see Finance Impact Section above.

7. LEGAL CONSIDERATIONS

- 7.1 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.

- 7.2 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 – 12 October 2022** 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

8. EQUALITIES IMPACT

- 8.1 There are no equalities implications arising directly from the content of this report, the report received recommendations from scrutiny, but no decision for recommendation.

9. HUMAN RESOURCES IMPACT

- 9.1 There are no human resource implications arising directly from the contents of this report

10. ENVIRONMENTAL IMPACT

- 10.1 There are no environmental implications arising directly from the contents of this report, the report received recommendations from scrutiny, but no decision for recommendation.

11. CRIME AND DISORDER REDUCTION IMPACT

- 11.1 There are no crime and disorder implications arising directly from the contents of this report, the report received recommendations from scrutiny, but no decision for recommendation.

12. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 12.1 There is a statutory requirement for Cabinet to receive the recommendations made by Scrutiny.

13. OPTIONS CONSIDERED AND REJECTED

- 13.1 None

14. DATA PROTECTION IMPLICATIONS

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

There are no Data Protection implications at this stage, but that the situation will be reviewed again at Stage 2 when Cabinet provide their response to the proposed recommendations.

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

No.

CONTACT OFFICER:

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APPENDICES:

Appendix A – Recommendations from Scrutiny

BACKGROUND DOCUMENTS:

Meeting of the Scrutiny & Overview Committee held on 6 September 2022

<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=166&MId=2925&Ver=4>

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Scrutiny Recommendations: Stage 1

Committee	Meeting Date	Agenda Item	Recommendation	Political Lead	Officer Lead
Scrutiny & Overview Committee	7 September 2022	Community Safety Partnership	The Committee would recommend that the evaluation criteria for the Violence against Women and Girls Strategy should include space for victims' voices and exit questioning	Councillor Ola Kolade	Kristian Aspinall
Scrutiny & Overview Committee	7 September 2022	Community Safety Partnership	The Committee urges the Council and the mayor to publicly recognise and celebrate frontline workers who works so hard to help with violence against women during the pandemic and beyond, particularly the independent domestic violence workers at the Family Justice Centre.	Councillor Ola Kolade	Kristian Aspinall
Scrutiny & Overview Committee	7 September 2022	Community Safety Partnership	The Committee welcomed the extra attention given to 'high priority areas' that suffer the vast majority of crime harm and recommends the creation of bespoke community plans to be created for these areas that involve their own unique community partners.	Councillor Ola Kolade	Kristian Aspinall
Scrutiny & Overview Committee	7 September 2022	Community Safety Partnership	The Committee recommends the police and the Council seek to partner with the voluntary sector on campaigns to de-normalise low level sexual harassment against women such as 'cat-calling'.	Councillor Ola Kolade	Kristian Aspinall
Scrutiny & Overview Committee	7 September 2022	Community Safety Partnership	As it was heard that it would increase the powers available to the Council to tackle antisocial behaviour in the private rented accommodation, the Committee recommends the development of a Landlord Licensing Scheme for Croydon being treated as a priority.	Councillor Ola Kolade	Kristian Aspinall

Committee	Meeting Date	Agenda Item	Recommendation	Political Lead	Officer Lead
Scrutiny & Overview Committee	7 September 2022	Community Safety Partnership	There was a recognition that at present there had been insufficient analysis to understand the links between the private rented sector and crime. As such the Committee would recommend that a workstream on this is created to ensure that an understanding is developed.	Councillor Ola Kolade	Kristian Aspinall
Scrutiny & Overview Committee	7 September 2022	Community Safety Partnership	The Committee would recommend that an emphasis is placed upon community engagement in informing the review of the Community Safety Partnership, with engagement being as extensive as possible within available resources. This should include community, voluntary, faith and resident groups.	Councillor Ola Kolade	Kristian Aspinall
Scrutiny & Overview Committee	7 September 2022	Community Safety Partnership	The Committee was supportive of the proposed youth engagement work outlined at the meeting and would recommend that work aimed at preventing crime was well embedded in future strategies.	Councillor Ola Kolade	Kristian Aspinall
Scrutiny & Overview Committee	7 September 2022	Budget Monitoring – Month 4	The Committee would request that a meeting is arranged with the Improvement and Assurance Panel, as part of the Budget Scrutiny process, to allow the Panel to share its insight on the Council's budget.	Councillor Jason Cummings	Jane West
Scrutiny & Overview Committee	7 September 2022	Budget Monitoring – Month 4	The Committee requests that future Cabinet Budget Monitoring reports include: - <ul style="list-style-type: none"> a) An explanation of potential changes to the Council's reserves b) The use of a dashboard in the Executive Summary to provide an easily digestible overview of the budget position. c) The estimated financial value when outline risks and other issues in the budget (see para 2.12 in Month 4 report for example). 	Councillor Jason Cummings	Jane West

Committee	Meeting Date	Agenda Item	Recommendation	Political Lead	Officer Lead
			<p>d) When income projections are included, actual income figures from previous years should be included for comparison.</p> <p>e) In light of being told it will possibly take 'two years' to get the Council's financial reporting systems up to standard, the Committee feels it would be beneficial to monitor how this is progressing through the inclusion of milestone targets that can be tracked.</p>		

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REPORT TO:	Cabinet 12 October 2022
SUBJECT:	Response to the Scrutiny Committee Task and Finish Group report on Inclusion and Exclusions
LEAD OFFICER:	Debbie Jones, Interim Corporate Director, Children, Young People and Education Shelley Davies, Director of Education, Children Young People and Education Jo Jack Acting Head of Access to Education
CABINET MEMBER:	Councillor Maria Gatland, Cabinet Member for Children and Young People
WARDS:	All

SUMMARY OF REPORT:

This report is a formal response to the task and finish group report in relation to inclusion and exclusion and in particular the recommendations from the task and finish group following the extensive focus on this.

The Education Department welcome the report and the opportunity to be involved in the process.

To implement the recommendations within the report the Education Department will need to work in partnership with school leaders across our sector. We will highlight, encourage, and support with the application of the recommendations. Several of the recommendations are not within the gift of the Local Authority to dictate but linked to individual education provisions decision making and it is them who will influence how the proposals will be delivered.

It is important that we do not focus on the recommendations in isolation but alongside the Education White and Green papers, the detail which is included in the report body, which focus on inclusion.

Oversight of the recommendations will be overseen by the Access to Education team in conjunction with school leaders. Governance of them will be through the Learning and Inclusion Board which has membership from our Lead Member, Corporate Director and officers.

FINANCIAL IMPACT:

The delivery of the recommendations should not result in any additional cost to the council but this will be explored based on further work in this area.

KEY DECISION REFERENCE NO: not a key decision

This is not a policy decision.

RECOMMENDATIONS:

The Executive Mayor, in Cabinet, is recommended to:

- I. Consider and comment on the report and recommendation on Inclusion and Exclusions from Children and Young People Scrutiny Committee Task and Finish Group; and
- II. To approve the draft response to the scrutiny recommendations which is set out at Paragraph 2 of this report

1. DETAIL OF YOUR REPORT

1.1 Context and Background

1.1.1. The legislative context: Green and White Papers and the importance of them alongside the Task and Finish Group recommendations

Alongside the Task and Finish Group report ‘Removal from roll and off-rolling of pupils in Croydon schools’ two key DfE Papers published in March 2022, will have considerable impact on how children are identified as needing support, how quickly they receive this support and from whom. Helpfully the factors identified within the report sit alongside some of the proposals within the DfE papers.

The White Paper *Opportunity for all: strong schools with great teachers for your child* aims to fortify support (at the right place and time) for children if they fall behind so as equip and enable them to have a fulfilled life.

Despite the Disadvantage Gap narrowing 9.1% between 2011 & 2019, more schools nationally being graded *good* or *outstanding* by Ofsted and better funding of increased Pupil Premium Grant (PPG), it is the Government’s perception that there are still too many children who leave education with a lack of key knowledge & skills. Therein lies the focus of the White Paper and our focus as an LA alongside our education provision.

There is an umbrella ambition that by 2030, the national GCSE average grade will increase from 4.5 (as it was in 2019), to 5. This ambition will be reinforced by an additional focus on ‘levelling up’ attainment at Key Stage 2.

How this is done will involve:

- Sharing practice (schools, teaching staff and children services)
- Attracting and developing a high-quality teaching taskforce and
- Scrutinising the functionality of the school environment – namely the improvement of behaviour and raising attendance.

The SEND Review (Green Paper): *Right support, right place, right time* also focuses on the need for children with SEND and / or with a Social Worker to receive timely and appropriate targeted support, so that they have the same opportunities as their peers.

This Review is in response to the acknowledgement that the reform of the 0 – 25 Service (implemented in 2014) was not working as it should. The system has not been without its complexities and the Paper identifies three main challenges:

1. Poor attendance and attainment outcomes for children and young people with SEN or in alternative provision in comparison to their peers.
2. The need to streamline processes, so that children, young people and their families can more easily navigate the SEND system. Furthermore, their success of this is not influenced by their access to finance and social resources.
3. Disparity between investment into the system vs. value for money outcomes for children, young people and their families.

The aim of the Review was to identify the causes of the identified challenges, set out a plan of action to rectify these and as a result, restore parents' / carers' confidence and rebalance the financial robustness. The Review is running alongside the health & social care reform - significant due to the very common overlap between young people with SEND accessing social care services.

The timing of these Papers are of particular significance. Prior to COVID, there was nationally some distance to travel in terms of attainment and progress. COVID has for some SYP had a negative impact on many children's learning and mental health, particularly those that are vulnerable.

In Croydon, the focus on early intervention / prevention is the drive for our current and developmental practise within the Access to Education Service and across the whole department. We champion a reflective, collaborative local area approach. All activities focus on levelling up the opportunity for participation for all children and young people. The Papers promote an inclusive system that includes early identification, good quality teaching and a knowledge rich curriculum. This ethos parallels with our work around inclusion, exclusions and behaviour in our Croydon schools.

1.1.2. The local context

Croydon has the 4th largest population of children and young people in London: 22.2% (85,672) of the population are aged 0–15 years. The projected growth in the population of children between the ages of 0 and 6 in Croydon between now and 2030 is just under 1000 - 40,431 – 41225.

1.2 Managed moves and exclusions

1.2.1. The responsibilities on local authorities in relation to exclusions / managed moves

All Croydon education settings must ensure that their exclusion procedures comply with the [Department for Education's \(DfE's\) statutory guidance](#), last updated in September 2017. In addition, the Council has a policy, which supersedes all other school-level handbook or policy statements in relation to exclusions. The policy outlines the varying stages and parameters of an exclusion, likewise the involved parties' duties.

1.2.2. The local context

The Access to Education Service continues to strive to reduce the rate of exclusions in Croydon schools and actively works to support schools and providers. It has been a combination of interventions that have led to the steady decrease in permanent exclusions at both primary and secondary ages. At primary school level there has been a total of 0 permanent exclusions this academic year. There has also been a steep decline in the number of pupils suspended/Fixed term excluded from school this academic year.

However exclusion rates for black Caribbean students nationally are disproportionately higher than those of their white peers in some local authorities, unfortunately the data in Croydon mirrors the national picture and our priority is to target support and resourcing for the pupil demographic presenting the most concern to reduce the disproportionality.

The complexion is also similar with Gypsy, Roma and Traveller children nationally. Exclusions are at much higher rates, with Roma children nine times more likely to be suspended in some areas. Similarly, exclusion rates for mixed-race white and black Caribbean students were more than four times higher than their white peers in several local authorities.

We understand that children who are outside of mainstream education are more vulnerable to becoming the victim of childhood criminal exploitation, the process of manipulating, threatening or coercing children into engaging in criminal activity, often to transport drugs in so called "county lines" operations.

The Access to Education Team have implemented several preventative models designed to support the reduction of pupils at risk of exclusion and to reduce disproportionality; schools are encouraged to take up this offer before considering permanent exclusion:

- Missing Monday Panel meeting (multi-agency panel meeting triaging and allocating out support for children at risk of or missing in education).
- Fair Access Panel (FAP) and Primary School Forum.
- The Team Around the School Approach (multi-agency early intervention support for schools).
- Frontline support from Attendance Improvement Officers (holistic support for pupils and their families).
- Exclusions Advice and guidance.
- Appropriate challenge at exclusion panel hearings.

1.3 Data on exclusions and managed moves

Local data

Indicator Title	2018/19	2019/20	2020/21	2021/22	Source
Overall					
Number of suspensions (fixed term exclusions)	1663	1401	1465	689	Capita One
Number of permanent exclusions	43	41	27	27	Capita One
Number of permanent exclusions reinstated	2	2	8	6	Capita One
Number permanent exclusions withdrawn	8	4	2	2	Capita One

Indicator Title	Published data						Source
	Croydon			2019/20 Benchmarking			
	2017/18	2018/19	2019/20	London	England	Stats Nbr Av.	
Permanent exclusions from schools as a percentage of the school population	0.06	0.06	0.05	0.04	0.06	0.03	DfE
Suspensions (fixed period exclusions) from schools as a percentage of pupils	3.83	3.82	3.39	2.61	3.76	2.55	DfE

The ongoing strategy for the new academic year is to continue with best practice in this area and to roll out the Team Around the School (TAS) approach to the most vulnerable schools, based on data on attendance and exclusions performance indicators. The goal is to ensure these schools are provided with on-going multi agency support that will support with early identification and early intervention to promote participation and further support vulnerable families.

2. Implementing the recommendations

To implement the recommendations within the Task and Finish Group report on '*Removal from roll and off-rolling pupils in Croydon schools*' the Education Department will need to work in partnership with school leaders across our sector.

We will lead on recommendations that fall within our remit and highlight, encourage, and support with the application of the recommendations which are part of education

provisions decision making processes and it is them who will influence how the proposals will be delivered.

	Recommendations	Response
1.	<p>That the Scrutiny and Overview Children and Young People Sub Committee seek from the Director of Education an annual report on Exclusions and Managed Moves, such report to be presented at an Autumn meeting and separate from the Standards report, the report to include the following areas at least in relation to managed moves:</p> <p>The number of managed moves agreed by the Fair Access Panel in the preceding academic year, including the provision of data as to the following characteristics of the children concerned: age, gender, free school meal eligibility, national curriculum year, SEND provision, ethnic group and level of deprivation - these are the characteristics which must be reported in respect of permanent exclusion</p> <ul style="list-style-type: none"> • the number of managed moves from a mainstream school to a PRU or other alternative provision • the number of managed moves from a mainstream school to another mainstream school • the number of managed moves which broke down during the 12 weeks' probationary period • an analysis of the reasons for the breakdown during the probationary period and information about the subsequent pathways of the children concerned. • the number of children reintegrated from alternative provision into mainstream, broken down into the number reintegrated who immediately prior to admission to AP had undergone permanent exclusion and the number reintegrated who immediately prior to admission to AP had undergone a managed move • in respect of managed moves to mainstream schools the number from each presenting school, and the number to each receiving school • such information as the local authority may possess about the number of managed moves not passing through the FAP process, including the characteristics set out in the first bullet point above • the chart of givers and takers (that is, for each school, the number of children 	<p>As part of a wider piece of work across the Service, progress is being made towards developing a data dashboard which aims to be inclusive of the points raised above.</p>

	<p>each school successfully presents to FAP, and the number each school accepts)</p> <ul style="list-style-type: none"> the destinations of children who have been permanently excluded 	
2.	<p>The Director prepares a paper on managed moves for the consideration of key stakeholders in FAP which sets out factors perceived to conduce to both good and bad outcomes and including some objective case studies.</p>	<p>Documents prepared include the following (which have been attached):</p> <ul style="list-style-type: none"> Managed Move Protocol A Managed Move Guide for Parents Secondary FAP Guidance. <p>The documents aim to act as a reference (in line with DfE legislation and guidance) and working guide in respect of operational best practice likewise strategic reflection of practise. We have started to collate case studies and will broaden the breadth of example schools.</p>
3.	<p>The Director instigates an independent evaluation of how participants perceive the collegiality of the managed moves process, and what might be done to enhance it.</p>	<p>There would be a cost to commission an independent evaluation of the managed move process, however in response to this the managed move process has been reviewed in its entirety in conjunction with a Working Group (11 secondary schools, including head teacher representation). The review has resulted in revised paperwork for stakeholders, ensuring that:</p> <ul style="list-style-type: none"> All offers of placements in mainstream schools, which are brokered through the Fair Access Panel will be managed moves. A managed move between two schools requires the knowledge, cooperation and consent of the parents / carers and governors of both schools. <p>This recommendation will need further discussion.</p>
4.	<p>The Director requests headteachers who are invited to the FAP to include information about the number of managed moves to and from their school in their termly report to their governing body, such as data to include all managed moves whether brokered through the FAP or in some other way.</p>	<p>The Working Group who scrutinised the Fair Access Protocol review have discussed this recommendation as part of our review. As a result, the Local Authority now receives and duly records data around manage moves that occur outside of the FAP process.</p> <p>This recommendation is not fully within the gift of the LA and Education Department and will be require the support of school leaders.</p>
5.	<p>The Governor Supports Team briefs secondary school governors on managed moves and provides guidance as to how they might scrutinise the issue.</p>	<p>The Strategic Lead responsible for FAP / managed moves has started discussions with Governor Services. It has been agreed that managed moves will be a component covered during future Governor training. Furthermore, Governors will be notified about any managed moves during their meetings with school leaders.</p>
6.	<p>The Director requests that the headteachers notify the Local Authority of a managed move they have arranged other than through FAP, such notification to be</p>	<p>Data collation as outlined in the recommendation has started (see Managed Moves outside of FAP 2021 – 2022 data attached). The next step in this process is to further develop the data dashboard,</p>

	<p>provided by the headteacher of the presenting school immediately after a starting date for the move has been agreed by all relevant parties</p>	<p>so that it encompasses the suggested characteristics above.</p> <p>This recommendation is not fully within the gift of the LA and Education Department and will be require the support of school leaders</p>
7.	<p>That the Director of Education continues to report to the Scrutiny and Overview Committee providing detailed information on how effective inclusion has been promoted in Croydon schools, including in particular information about how the Council has been using its role as community leader to inspire, share and disseminate good practice in inclusive education, and in particular but not limited to:</p> <ul style="list-style-type: none"> • further encouragement of schools to develop awareness of how and in what way they can use trauma-informed approaches • the identification of the characteristics of good pastoral care • the development of the use of quiet rooms in our schools to allow for pupils to benefit from non-punitive time out . • bringing school and community stakeholders together with a view to building capacity in more of our schools to introduce an extended day 5. • co-ordinating schools to ensure that commissioning of AP is conducted in a way which maximises the chance of the speedy and successful reintegration of children in AP/In-School Behaviour Units into the mainstream classroom. • working in concert with school and community stakeholders to make the case to government and other potential funding providers funding levels which enable schools to be able to commission sufficient specialised support so that more children can remain in or be reintegrated into the mainstream classroom 	<p>An example of promoting effective inclusion has been the introduction of the Team Around the School model.</p> <p>This multi-agency operating model addresses incidents whereby vulnerable families do not meet the threshold for statutory support, but would benefit from additional intervention.</p> <p>A guidance pack was put together and an introductory letter sent to Head teachers introducing the model and how it can benefit them, their pupils and their families.</p> <p>Some of this is included within our Standards report.</p>
8.	<p>The Director of Education be invited to present a report to the Scrutiny and Overview Children and Young People Sub-Committee with a view to improving primary to secondary school transition in Croydon, and taking particular account of the points set out in paragraph 3.1 of Section B of this</p>	<p>Whilst a report has not yet been completed, preliminary work has started in this area. In Summer term 2022, a roundtable discussion was held, led by the Education Safeguarding lead with DSLs / named members of staff in both primary and secondary schools. The aim of the session (held over two days) was to discuss / raise awareness and put in place plans for any learner</p>

	report.	transitioning from Yr. 6 – Yr. 7 that was cause for concern.
9.	The Director of Education is invited to consider those recommendations of the All Party Parliamentary Group on Autism which have most direct bearing on local authorities as set out in paragraph 3.2 above, and to set out in a report to the Scrutiny and Overview CYP Sub-Committee what the Council might do to address those recommendations.	This will be included as part of the development of the SEND strategy.
10.	The Director of Education is invited to publish pages on the Council website which set out in plain English: <ul style="list-style-type: none"> • the law on informal exclusions • the responsibilities of schools towards pupils with special educational needs and disabilities pursuant to the Equality Act, the SEND Code of Practice, and statutory and non-statutory guidance on suspension and exclusion practice and school behaviour policies as may be published and revised from time to time by the DfE; and, further, • to develop a clear procedure to enable parents to make anonymous reports about schools breaking exclusions law, and publicising the availability of the procedure on the website 	There is information on the website pertaining to exclusions with details of how parents can get in touch to anonymously report schools breaking exclusions law. SEND https://www.croydon.gov.uk/children-young-people-and-families/special-educational-needs-and-disability-support/SEND-support - access the Local Offer section.
11.	The Director of Education is invited to consider how all mainstream schools can be made aware of the best practice existing in Croydon schools as to the education of children with Autism Spectrum Disorder.	https://www.croydon.gov.uk/children-young-people-and-families/special-educational-needs-and-disability-support/SEND-support - access the Local Offer section.
12.	The Director of Education is invited to consider the issue that parents quite often find meetings with school leaders and/or other professionals (particularly meetings which are potentially contentious) as extremely stressful, and provide guidance to schools and other professionals who may attend such meetings on how to set up such meetings in a sensitive, constructive and unthreatening way.	This will be included as part of our meetings with School Leaders.
13.	The Director of Education is invited: <ul style="list-style-type: none"> • to ask Octavo Partnership Governor Services to provide training to school governors on issues surrounding removal from the classroom, and to publicise the availability of the training in all schools • to include questions on the use by schools of in-school behaviour units in the annual local authority safeguarding audit. 	The Octavo Partnership teams became LA staff at the start of the pandemic. We will work with these staff in relation to the points raised.

14.	<p>The Director of Education is invited to take into account the conclusions of the TFG in drafting the Council's response to the current DfE consultation on revised guidance about school behaviour policies, and in particular to highlight the following:</p> <ul style="list-style-type: none"> • The lack of clarity about different short-term and longer-term pathways for a pupil which might reasonably follow after removal from the classroom • The need for there to be a clear safeguarding framework surrounding removed pupils, including where necessary unannounced visits to units to which pupils have been removed, and for the local authority in which an ISU may be located to have the key role in undertaking the safeguarding function • The implications of the guidance for Ofsted in respect of its inspection framework: in particular, when Ofsted inspect a school with pupils registered at that school and an off-site ISU, the quality of the ongoing care and support provided by the school to those pupils should be a focus of their inspection, quite separate from inspection of the ISU itself • The funding implications if ISUs are to follow best practice as indicated in the draft guidance 	
15.	<p>The Director of Education is invited to hold an early discussion with borough headteachers and AP units about the implications of the draft DfE guidance for the development of good practice on removal of pupils from classrooms in Croydon schools and AP units.</p>	
16.	<p>That the KPI dashboard which is presented to Scrutiny and Overview CYP Sub-Committee shows what percentage of annual reviews of EHE have been completed.</p>	<p>Work is being undertaken to ensure that this data is presented in the KPI dashboard going forward. For the purpose of this report, a narrative about annual reviews of EHE has been included.</p>
17.	<p>That the Corporate Director responsible for Children and Young People provides by 18 March 2022 a written briefing note to members of the Scrutiny and Overview CYP Sub- Committee addressing the issue of whether the principles and practices set out in paragraphs 9.4-9.6 of the 2019 EHE policy are being implemented.</p>	
18.	<p>The Director of Education is asked to provide a short report setting out the Council's response to that part of the draft</p>	<p>FAP is a Statutory process, it does not just support managed moved but is part of the admissions process</p>

	<p>consultation which relates to managed moves, and dealing with among other things the following matters:</p> <ul style="list-style-type: none"> • the potentially positive and potentially negative consequences flowing from disbandment of the FAP • whether the FAP should continue as long as possible, or be disbanded at an early specific time • what contingency plans are being made to face a future without the FAP 	
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3. Governance

Governance of the strategy will be overseen by internal strategic management groups and partnership boards (see chart below). The Learning and Inclusion Board will provide support and challenge in relation to the delivery of the recommendations. (Considering the decision making of School Leaders to implement.)

4. Consultation

4.1 This report is for information purposes only – to provide an annual overview of education standards and pupil outcomes – and therefore consultation is not appropriate.

5. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

5.1 The Executive Mayor is asked to note the actions in response to the recommendations listed within the CYP Scrutiny sub-committee Task and Finish group report.

6. OPTIONS CONSIDERED AND REJECTED

NA

7. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

7.1 **The effect of the decision** – Not applicable

7.2 **Risks** – Not applicable

7.3 **Options** – Not applicable

7.4 **Future savings/efficiencies**

8. LEGAL CONSIDERATIONS

8.1 Under Section 9F Local Government Act 2000 (“The Act”), Scrutiny and Overview Committee (SOC) have the powers to review or scrutinise decisions made, or other action taken in connection with the discharge of any executive and non-

executive functions and to make reports or recommendations to the executive or to the authority with respect to the discharge of those functions. SOC also have the powers to make reports or recommendations to the executive or to the authority on matters, which affect the authority's area or the inhabitants of its area. To discharge this scrutiny function, SOC has appointed Scrutiny Review Sub-Committees, which includes Children and Young People's (CYP) Scrutiny Sub-Committee. Pursuant to the above provision, CYP Scrutiny Committee Task and Finish Group has provided a report on Inclusion and Exclusions and made several recommendations, set out in the report.

- 8.2 Under Section 9FE of the Act, there is a duty on Cabinet to respond to the scrutiny report, indicating what (if any) action Cabinet proposes to take, within 2 months of receiving the report and recommendations.
- 8.3 Local Authorities have a legal duty to ensure that every child fulfils their educational potential and to promote high standards of education and fair access to education under the Education Act 1996, 2002 and s.88 Equality Act 2010.

Approved by Doutimi Aseh, Head of Social Care & Education Law on behalf of Stephen Lawrence-Orumwense, Director of Legal Services & Monitoring Officer.

9. HUMAN RESOURCES IMPACT

- 9.1 The recommendations contained within this report will be dependent upon a high quality teaching workforce, effectively trained in equality, diversity and inclusion good practice. These will be important issues for the directorate and school leadership to address

Approved by: *Dean Shoesmith, Chief People Officer*

10. EQUALITIES IMPACT

- 10.2 Section 149 involves the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This requires organisations to undertake the following:
- Remove or minimise disadvantages suffered by people due to their protected characteristics.
 - Take steps to meet the needs of people from protected groups where these are different from the needs of other people.
- 10.1 This means we must take particular care to ensure that we seek the views of protected equality groups who are often 'seldom heard'
- 10.3 Due consideration will be given to ensuring that our focus of work in this area aims to reduce disproportionality particularly in relation to race and gender and that this is explicit to our stakeholders including parents / carers and families to ensure inclusion.

10.4 The Educations Standards Cabinet report will include a full breakdown of both National and Local Exclusions data.

Approved: Denise McCausland – Equality Programme Manager

11. ENVIRONMENTAL IMPACT

11.1 It is considered that there are no increased or decreased negative environmental sustainability impacts arising from the proposals in this report.

12. CRIME AND DISORDER REDUCTION IMPACT

12.1 The recommendations seeks to improve the pathway.

12.2 It is considered that there are no increased impacts on children and families from these proposals.

13. DATA PROTECTION IMPLICATIONS

14. WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

NO

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

NO

15.1 If required in the future, Information Management will be consulted for advice at the earliest opportunity.

15.2 Approved by: Shelley Davies, Direction of Education

CONTACT OFFICER: Shelley Davies, Director of Education

APPENDICES TO THIS REPORT:

Managed Move Protocol – see attached.

A Managed move Guide for Parents – attached.

Secondary FAP Guidance – attached.

Managed Moves outside of FAP 2021 – 2022 – attached.

BACKGROUND DOCUMENTS – LOCAL GOVERNMENT ACT 1972

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REPORT TO:	CABINET
SUBJECT:	Tackling Graffiti in Croydon
LEAD OFFICER:	<i>Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration and Economic Recovery</i> <i>Steve Iles Director of Sustainable Communities</i>
CABINET MEMBER:	Cllr Scott Roche - Cabinet Member Streets & Environment
WARDS:	All

SUMMARY OF REPORT:

This report presents the council's approach with an enhanced Graffiti service, which is the fulfilment of a key Manifesto commitment set out by the Executive Mayor. It sets out the Council's approach for an increased focus on removing illegal, antisocial, offensive graffiti, including non-offensive graffiti across the borough.

Graffiti is an issue which is seen across the borough, and which impacts on the image of our town.

This paper sets out the Council's framework and plans to increase resources to tackle and reduce the negative impact graffiti has on the quality of life for residents and businesses.

This new policy direction will allow graffiti enforcement and removal resources to focus on where they are needed, to improve local environmental quality, help reduce fear of crime, whilst helping increase pride in Croydon.

FINANCIAL IMPACT:

Financial impacts arising from the recommendations of this report are:

- The estimated £0.5m cost of the enhanced graffiti service will be financed in 2022/23 from the Streets & Neighbourhoods earmarked reserve
- The cost in future years will need to be the subject of a growth bid as part of 2023/24 budget setting, this will include exploration of Community Infrastructure Levy funding. The future service will be tailored to be delivered within the available resources.

KEY DECISION REFERENCE NO.: 3322EM

1. RECOMMENDATIONS:

For the reasons set out in the report and its appendix, the Executive Mayor in Cabinet is recommended:

- 1.1. To approve the plans for tackling graffiti across the borough.
- 1.2. To approve the additional expenditure of £0.5m as set out in section 4 of the report.
- 1.3. To approve the additional services being commissioned through the existing highways contract.
- 1.4. To approve a holistic task-force approach to clean up specific areas which would include graffiti.
- 1.5. To approve the council may charge property owners to recover its costs for the removal of graffiti.
- 1.6. To approve the draft Graffiti and Street Art Policy as set out in appendix 1.
- 1.7. To approve Officers to explore the options from external providers which support Croydon's financial and social value priorities.

2. BACKGROUND

- 2.1 This report presents the council with proposals for an enhanced Graffiti service. It sets out our approach for an increased focus on removing illegal, antisocial and offensive and non-offensive graffiti. Tackling graffiti is a mayoral priority with commitments to reinstate a full graffiti service.
- 2.2 Graffiti can be defined as any drawings, scribbles, messages or 'tags' that are painted or written on walls and other surfaces. Graffiti is criminal damage and costs the UK over £1 billion per year. For the purposes of this report, we are not including 'Graffiti-Art', where this is commissioned or tolerated by the owner of the surface.
- 2.3 The graffiti service was removed in 2020/21 as result of the serious governance and financial challenges that Croydon Council faced and formed part of the financial recovery agreed in the first phase of the Croydon Renewal Plan. In the year before the service deletion, the service removed approximately 12,000 items of graffiti, with 262 of these being classed as 'offensive' graffiti.

- 2.4 Following the removal of the previous service in 20/21, Croydon has experienced increased reporting of the level of graffiti in some parts of the borough, which has the potential to drive away inward investment into those areas.
- 2.5 Linked to this report are plans to increase resources to tackle unwelcome, antisocial, and offensive graffiti. By reinstating this service, it will allow graffiti enforcement and removal resources to focus on where they are needed, to improve local environmental quality, help reduce fear of crime and increase resident satisfaction.
- 2.6 The Council is directly responsible for removing graffiti from its property and is only indirectly responsible for other graffiti. Priority continues to be given to removing offensive graffiti, where it is considered racially offensive, hostile to a religious or belief group, sexually offensive, homophobic, depicts a sexual or violent act or is defamatory.
- 2.7 Additionally, the council may choose to remove Graffiti which is deemed to be detrimental - factors might include the surface area covered by the graffiti, local complaints and the degree and nature of the graffiti problem in the area.
- 2.8 Less priority has been given to removing street art in those areas where it is more welcome. Some residents and businesses believe street art can positively contribute to the appearance of an area, attract visitors and is good for business.
- 2.9 In the absence of a clear policy on how to deal with graffiti and street art we have previously followed national guidance and legislation. Where either of these is unwanted and appears without consent, this is viewed as an interference with the property owner's rights and as such the person has committed a criminal offence under the Criminal Damage Act 1971.
- 2.10 Appendix 1 details the draft Croydon Graffiti and Street Art policy where it is intended to set out the Council's position. If the policy is adopted, it will give clarity on how to deal with these issues moving forwards and provides the basis for a discussion on what constitutes street art, and what may be considered as graffiti and therefore dealt with accordingly.

3. CURRENT ARRANGEMENTS

- 3.1 Legislation for removal of graffiti places the responsibility to remove graffiti on the owner, resident, or managers of the property. The council remove graffiti from council owned property and take action to

encourage removal of graffiti from private property, where it is visible from the public highway.

- 3.2 Local Authorities have powers to serve graffiti removal notices to enforce removal on private land. As part of our new approach, we will try to work with landowners to encourage them to take action to remove graffiti, but, if necessary, would use available enforcement powers. section 43 Antisocial Behaviour Crime and Policing Act 2014 gives local authorities the power to serve graffiti removal notices on certain bodies responsible for the surface where graffiti has appeared. These bodies include the owners of street furniture (bus shelters, street signs, phone boxes etc.). The notice gives a minimum of 28 days for the removal of the graffiti, if after that time it has not been removed the local authority can remove it and can recover its costs.
- 3.3 Where graffiti is identified on property owned by Businesses, Registered Social Landlords, Private Landlords, Network Rail and Transport for London our teams work with these property owners to ensure they remove their own graffiti.
- 3.4 Further enforcement powers are available to the council to deal with graffiti offenders such as the issuing of Community Protection Notices, which can be used to help prevent individuals, aged 16 or over from doing specified things, including graffiti tagging.

4. FINANCIAL CONSIDERATIONS

- 4.1 With the Mayor making a manifesto commitment to tackle graffiti, £0.5m has been set aside from the 22/23 earmarked reserves. Further work is needed during the budget setting process for 23/24 to ensure sufficient monies are allocated to sustain a fit for purpose graffiti service. Community Infrastructure Levy funding will be explored as a potential source of funding the service. The scope and scale of the service will be designed to be delivered with the available resources.
- 4.2 The arrangements for 22/23 will allow of up to £0.5m to be spent on additional graffiti removal teams to help tackle the current backlog and to allow for more proactive removal of graffiti where required. This first year of operation of the enhanced service will allow the council to establish the reporting processes and operational plans with new teams brought into service from June 2022. These resources have been in place to undertake a targeted find and clean activity on highway property. This is to be based on known graffiti hotspots within the borough.
- 4.3 It is envisaged that with additional dedicated teams in place and a revised framework for managing the service, there will be a significant visible impact, both in terms of the speed of removal, return visits and ensuring a cleaner environment

- 4.4 The council will also develop proposals for introduction of a chargeable anti-graffiti coating service along with advice on graffiti prevention. This will reduce future costs of removing graffiti.
- 4.5 In addition, we will be reviewing operational plans to work more closely with Community Payback teams. The Community Payback scheme, hosted by the London Community Rehabilitation Company (LCRC), provides local communities the opportunity to suggest suitable areas for offenders to rejuvenate as part of their Community Order. LCRC works with offenders aged 18 and over who have been either sentenced by the courts to a Community Order or Suspended Sentence Order or released on licence from prison to serve the rest of their sentence in the community. Community Payback projects include removing graffiti, litter removal and environmental improvements. As part of developing plans the council will aim to carry out regular Community Payback Graffiti removal project.
- 4.6 The Council will work with Resident Associations, Friends' Groups and others, to look at how some areas might be cleaned via the Council providing support for materials which such groups may utilise themselves.
- 4.7 A taskforce approach will be set up to coordinate the clean-up of particular areas that have been identified from reporting, which would include the removal of graffiti alongside dealing with other anti-social issues.

5. CLEARING UNWANTED, OFFENSIVE, RACIST, AND ANTISOCIAL GRAFFITI FROM WHERE IT IS NOT WANTED

- 5.1 Offensive Graffiti removal is carried out by our current Highways contractor. Within the specifications, highways contractor is tasked to remove offensive graffiti within 24 hours and non-offensive graffiti within 10 working days.
- 5.2 Non-offensive graffiti is only to be removed on council property. Private landlords or other housing management organisations can request the council to remove graffiti on their property. They will be asked to sign a disclaimer to exonerate the council of any responsibility if the action of removing graffiti causes damage to a property. –
- **On public buildings or highways and street furniture** – removed for by the council
 - **On a Council Housing Estate** – clearance is organised via the local housing officers through the Highways contract and charges covered by the Housing Revenue Account (HRA).
 - **Where graffiti is reported on private land**, the Council will seek to contact the landowner and where necessary serve notice requiring them to remove the graffiti. Should the landowner fail to comply with

terms of the notice, the Council has the power to remove the graffiti and recover the cost from the landowner.

- **On property and estates roads managed by private landlords -** Removal of graffiti on private property is the responsibility of the owner(s). Many have their own graffiti removal teams in place so in the first instance, the council's contact is via the relevant housing office or managing agents to organise graffiti removal.
- **On other private property –** Many individual owners/occupiers of private dwellings do not have access to a graffiti removal facility. If the graffiti is not too large and is accessible, the council may arrange for its removal subject to a disclaimer being signed by the owner of the property. There may also need to be agreement to pay to cover the council's costs. Subsequent graffiti removal requests would normally be subject to a charge, with such charges being set as part of the Fees and Charges annual review.
- There will also be a more targeted use of clearance teams to deal with hotspots, problems areas and locations suffering from repeated graffiti incidents. However, efforts will be hampered by the sheer volume of graffiti across the borough, built up over several years but more recently due to the withdrawal of the service in 2020/21.

6. INITIAL REINSTATED SERVICE

- 6.1 The highways contractor (FM Conway) has the ability to flex the service offer to contribute to a 'blitz' clean-up approach to a particular area. This is to be undertaken in conjunction (and coordination) with other responsible property owners to remove graffiti on all surfaces. The Council may give notice to property owners to engage in the process, reserving the right to charge for removal as part of this 'blitz' approach. The intention is to clean an entire area to fulfil the Mayoral commitment to improve local environmental quality, help reduce fear of crime, whilst helping increase pride in Croydon
- 6.2 The reporting of graffiti on public land can be undertaken via the LoveCleanStreets app, and is automatically imported to Confirm, the Highways Asset Management system used to generate works orders for the highways contractor. This ensures there is little or no delay between the time a resident reports graffiti to the time the works order is generated to the contractor.
- 6.3 Picture reporting of before and after is used to validate the removal, and confirmation is made to the reporting email address to indicate that the graffiti has been removed.
- 6.4 Mapping of the reporting, progress and completion is available through Confirm.

7. CONSULTATION

- 7.1 Section 3 of the Local Government Act 1999 places a duty on local authorities to consult certain “representatives” for the purpose of deciding how to fulfil its best value duty. However, as it is proposed to rely on existing contractual arrangements, rather than to make any high-level changes in how the Council delivers these services, it is considered that the duty to consult will not apply
- 7.2 Graffiti reported by members of the public on the Council’s public highway network will be assessed / considered for appropriate action.

8. OPTIONS CONSIDERED AND REJECTED

- 8.1 Officers have carried out background research to explore potential options available for managing graffiti, street art and defacement, taking into consideration best practice from across other local authorities, with the main alternatives set out below:
- 8.2 Taking no action - The council will not take any action to remove any graffiti or defacement regardless of its location unless it is deemed to be of an offensive nature.
- 8.3 Offensive only removal - The council will not take any action to remove any graffiti or defacement regardless of its location unless it is deemed to be of an offensive nature.
 - 8.3.1. Neither of the above approaches are recommended because graffiti or defacement will increase in the borough, which will deteriorate local environmental quality, increase fear of crime, and reduce resident satisfaction in their neighbourhoods
- 8.4 Borough-wide ban - No graffiti or defacement of any form in any location or surface will be tolerated by the council and will be removed. This is not realistic as it fails to recognise the benefit of street art and is unrealistic to enforce.
- 8.5 Designated areas and graffiti walls - Allow inoffensive graffiti and street art in designated areas and surfaces within the borough. This is not recommended because previous experience by other local authorities shows that graffiti was left beyond designated areas and difficult to contain in designated areas.
- 8.6 Bringing the service in house. This option was considered and rejected due to the relatively high cost and difficulty in mobilising quickly given the need to recruit staff and purchase specialist equipment.

- 8.7 Using the Waste Services Contract to undertake the work. This option was rejected as whilst graffiti removal was an item within the schedule of rates, the contract was not resourced to undertake this function immediately and the costs associated would have been prohibitive.
- 8.8 Rejected in the short-term, but a future aspiration for service delivery is to enable external contractors (including SMEs) to bid. This was rejected in the short term, as there was insufficient time before mobilising to undertake graffiti removal. If the council decides not to use the highways contractor to continue with the graffiti removal day rate option as part of a medium-longer term procurement strategy, there would need to be a Tender opportunity for any contract work due to the value of the proposed works. A tender which considers the social value added to the contract could encourage local businesses to bid for the work.

9. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 9.1 As a key Mayoral pledge, we are committed to tackling the 'broken window effect' to improve areas as part of an overall clean-up, to encourage investment and tackle low-level anti-social behaviour.
- 9.2 The decision to use the highways contractor contract to deliver this service reflects the relative ease of adaptation to this demand, as this contractor is currently undertaking the removal of offensive graffiti in the borough and has provided a competitive rate for non-offensive graffiti as part of the competitive tendering exercise in 2018. This option represents value for money and continuity of service.

10. RISK ASSESSMENT CONSIDERATIONS

- 10.1 The lack of clear policy and action on tackling the increasing levels of graffiti across the borough would lead to an ever-worsening situation with graffiti.
- 10.2 The lack of a clear approach would risk our ability to deliver on priority outcomes for the borough.
- 10.3 The council undertakes to conduct a 'before and after' analysis to determine the value of the service commissioned through the highways contractor, and any 'return rate' of graffiti to a recently-cleaned area.

11. FUTURE SAVINGS/EFFICIENCIES

- 11.1 At present there are no future savings or efficiencies as this is a reinstatement of a previously removed service. Once the service has been established there may be opportunities for income generation through graffiti removal services on behalf of other organisations or private companies in addition to the proposals for introduction of a chargeable anti-graffiti coating service.
- 11.2 Approved by: Darrell Jones, Acting Head of Finance – Sustainable Communities, Regeneration & Economic Recovery

12. LEGAL CONSIDERATIONS

- 12.1 The Council has power under section 43 of the Anti-social Behaviour Act 2003 as amended by the Clean Neighbourhoods & environment Act 2005 to issue fixed penalty notices to anyone caught doing graffiti. The Environmental Offences (Fixed Penalties) (England) Regulations 2017 which came in force on 1st April 2018 amended the penalty charge for this offence.
- 12.2 In addition under section 43 Antisocial Behaviour Crime and policing Act 2014, the council has power to issue a Community Protection Notice to an individual aged 16 or over, or a body requiring the person or body to stop doing specified things, to do specified things or take reasonable steps to achieve specified things, if satisfied on reasonable grounds that: (a) the conduct of the individual or body is having a detrimental effect, of a persistent or continuing nature, on the quality of life of those in the locality, and b) the conduct is unreasonable.
- 12.3 Any conduct on or affecting premises is to be treated as the conduct of the owner or occupier.
- 12.4 Where a person issued with a community protection notice fails to comply with requirement of the notice, the Council may have work carried out to ensure that the failure is remedied, but only on land that is open to the air. Where the premises is not open to the air, the Council would first need to issue a notice specifying the work it intends to have carried out to ensure that the failure is remedied, the estimated cost of the work, and invite the defaulter to consent to the work being carried out before doing so. The consent must be obtained from the defaulter and the owner of the premises on which the work is to be carried out unless the authority is unable to contact the owner after making reasonable efforts to do so.
- 12.5 A person who fails to comply with a Community Protection Notice commits a criminal offence and on conviction if an individual, liable to a fine not exceeding level 4 (£2,500) or if a body, to a fine not exceeding £20,000.

- 12.6 Additionally, the Council has powers under section 1 of the Antisocial Behaviour Crime and Policing Act 2014 to apply for an injunction to compel the owners and occupiers of premises to remove graffiti from premises.
- 12.7 When carrying out its duties under this policy, the Council will be obliged to comply with its duties under section 149 of the Equality Act 2010 that is, the need to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act, advance equality of opportunity between people who share a protected characteristic and those who do not and foster good relations between people who share a protected characteristic and those who do not.
- 12.8 The Council has powers to enter into arrangements with private owners for the removal of graffiti under its general power of competence in Sec 1 of the Localism Act 2011 and to charge for providing this service under Sec 3 of that Act.
- 12.9 Approved by Sandra Herbert, Head of Litigation and Corporate Law and Deputy Monitoring Officer on behalf of the Director of Legal Services and Monitoring Officer.

13. HUMAN RESOURCES IMPACT

- 13.1 The report recommends the recruitment of a temporary administrator to assist with the administrative works whilst the development of the Lovecleanstreets App. This will be managed under the Council's Recruitment Policy. Other than this issue there are no other Human resources impacts arising from this report.
- 13.2 If any should arise these will be managed under the Council's Policies and Procedures.
- 13.3 Approved by: Jennifer Sankar, Head of HR Housing Directorate & Sustainable Communities, Regeneration and Economic Recovery, for and on behalf of Dean Shoemith, Chief People Officer

14. EQUALITIES IMPACT

- 14.1 The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in the Sec 149 Equality Act 2010. The Council must, in the performance of its functions, therefore, have due regard to:
- I. eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - II. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - III. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

- 14.2 It is imperative to ensure that graffiti that is targeted at any protected characteristic is removed at the earliest opportunity. Such graffiti is offensive, demeaning and has a negative impact on the lived experience of people belonging to protected characteristics. The removal of such graffiti may reduce perceptions of fear of crime in individuals who belong to protected characteristics.
- 14.3 The Council developed a Hate Crime Pledge in 2019. Graffiti which is offensive to protected characteristics may potentially be classed as a hate crime and should be monitored and reported to the Community Safety Team.
- 14.4 The policy is expected to make a positive impact on the environment of the Borough, which will be beneficial for all regardless of their background.
- 14.5 The policy is expected to make a positive impact on the environment of the Borough, which will be beneficial for all regardless of their background.
- 14.6 Approved by: Denise McCausland – Equality Programme

15. ENVIRONMENTAL IMPACT

- 15.1 Plans are being developed to ensure that all new graffiti removal vehicles and equipment comply with clean air emission standards. Operational plans will include measure to reduce as much as possible any adverse impacts on air quality.

16. CRIME AND DISORDER IMPACT

- 16.1 The Council's activities for tackling litter, fly tipping, removal of graffiti and flyposting that are incorporated into the Waste Management Strategy. This work contributes to the Council's efforts in managing anti-social behaviour within the borough. Sustainable Communities division will continue to incorporate the current policy requirement for the immediate removal of racist or offensive graffiti from Council owned property.

17. DATA PROTECTION IMPLICATIONS

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

NO

- 17.2 **HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

17.3 **NO**

Cabinet & Executive Template

The Director of Sustainable Communities comments that the council's information management team have advised that a DPIA would not be required in this instance and that the subject of the report does not involve the processing of personal data. Once the council has developed the chargeable service a DPIA will be completed.

Approved: by Steve Iles, Director of Sustainable Communities, dated 29/09

CONTACT OFFICER: *Steve Iles. Director of Sustainable Communities,*
steve.iles@croydon.gov.uk, Tel: ext 52821

APPENDICES TO THIS REPORT: Draft Council Graffiti Policy

BACKGROUND DOCUMENTS – LOCAL GOVERNMENT ACT 1972

None.

Graffiti and Street Art Policy

London Borough of Croydon Graffiti and Street Art Policy

Croydon Council recognises the adverse impact graffiti and fly-posting can have on public and visitor perception.

The Council is committed to tackling unwanted, illegal and antisocial graffiti, whilst taking a balanced view on street art. This policy supports priorities set out by the Croydon's Renewal Plan to deliver "a borough that our residents are proud of and love to live in".

The outcomes we aim to achieve under this priority are:

- People live in a borough that is clean and green.
- People live in good quality affordable homes and well-designed neighbourhoods.
- People feel safer in their neighbourhoods and anti-social behaviour is tackled.
- People feel they are part of a cohesive and vibrant community.
- Helps to restore respect in our towns and district centres.
- Reduce the perception of crime associated with areas containing graffiti.
- Encourage investment.
- Increase Pride in Croydon.

The policy sets out clear principles for addressing graffiti and street art. Where either of these is unwanted and appears without consent, this will be viewed as an interference with the property owner's rights and as such the person has committed a criminal offence under the Criminal Damage Act 1971. The Council also has a power under section 43 of the Anti-social Behaviour Act 2003 as amended by the Clean Air Neighbourhood & Environment Act 2005 to deal with graffiti offences and to enforce removal of graffiti from private property where required.

The Department of Food and Rural Affairs (DEFRA) defines graffiti as "any informal or illegal marks, drawings or paintings that have been deliberately made by a person or persons on any physical element comprising the outdoor environment, with a view to communicating some message or symbol etc. to others".

Graffiti, street art and fly-posting can have a detrimental impact on the local environment and people's quality of life when it is offensive. According to DEFRA guidance, offensive graffiti applies where it is racially offensive, hostile to a religious or belief group, sexually offensive, homophobic, depicts a sexual or violent act or is defamatory.

Graffiti Removal

The Council does not consent to any painting, writing, soiling, marking or other defacement

on its property including footways without its prior express permission being obtained. Where

graffiti is found on council owned properties or street furniture the graffiti will be removed.

In addition the Anti-Social Behaviour Act 2003 confers power on the Council to secure the

removal of graffiti from private property. Enforcement action can be taken, even where the

owner does not object to it remaining on their property.

In these circumstances the council reserves the right to take formal action against the owner

to secure removal and if the owner does nothing, then the council may enter the land, clear

or otherwise remedy the graffiti and recover the costs from the owner.

Subject to funding, the council may provide a free first-time graffiti removal service to owners/occupiers of properties. This removal work takes place in agreement with the owner

and in some more difficult cases the owner of the property may be required to contribute to the cost of removal and or the cost of anti-graffiti coatings.

Where graffiti is visible from the public areas, is considered accessible and deemed to be

offensive removal will take place within 24 hours where possible.

Preventing Graffiti

The Council will continue to work with residents and groups in creating alternative diversions

to graffiti problems (e.g. repeated tagging), examples of diversions include initiatives such as

community clean ups and graffiti prevention schemes. In addition the Council recognises the

importance of engaging young people through an on-going programme of education and

diversionary techniques, including through schools and organised youth activities in areas

where graffiti is identified as a problem.

They will also work in partnership with a range of other agencies and organisations to explore preventative measures and ideas.

Street Art

The Council recognises that public opinion on what constitutes graffiti has changed, that some "Graffiti" is now considered to be "Street art" and that some members of the community now consider that "Street Art" makes a positive contribution to the urban environment. Where some property owners commission street artists to decorate their properties enhancing visitor engagement with the public realm, this is viewed by the Council as a positive attraction to the borough.

In recognition of this the Council accepts that properly authorised and appropriate street art may be recognised and supported subject to meeting acceptance criteria within this policy and not being a detriment to local environmental quality.

If a property owner wishes to apply an artwork to their property they must inform the council at the earliest opportunity. Where graffiti has already been applied to a property but the owner of the property considers the graffiti to be street art the property owner must notify the council's that they would like to keep the work.

In both circumstances a decision not to remove the work will be based upon a test of whether the street art or graffiti are considered to be detrimental to the local environment and enjoyment of the location by users.

The list below highlights key considerations:

- Can the Street Art/Graffiti be seen from areas the public are entitled to frequent.
- Is the "Street Art" offensive in its nature, gang related, racially aggravating, insulting and against public interest.
- Are the images considered to be contextually detrimental including but not limited to:
 - Encouraging to illegal graffiti proliferation, inappropriate for the location e.g. Adult content near schools, out of keeping with surrounding area.
- Saturation (Consideration of the number of images already present in the area.
- Complaints
- Other policies likely to be infringed
- Explicit Images
- Intimidating
- Libellous or potentially libellous statements
- In a conservation area
- On a listed building
- Tag's
- Scratching
- On Local Authority property.

This list is not exhaustive and adequate exploration of the detriment question is critical to provide the Council with a clear considered rationale for any decision especially where conflicting opinions between owner/occupier, the council and the community exist.

This is a matter of judgment for the decision taker, acting reasonably and having due regard to national guidance and to this policy.

There is no obligation on the Council to consult in connection with the exercise of its Graffiti removal powers and in most cases it will not be in the public interest for it to do so.

Evaluating graffiti and street art

There may be occasions when it is difficult to make a clear decision whether a piece is street art. In this situation cases will be referred to an evaluation panel made up of council officers.

The evaluation panel will review each case applying the policy criteria in order to reach agreement on whether a piece is removed or allowed to remain in place.

Evaluation by the board will take place when the council receives challenge and complaints

from the community and when trained council staff have found it difficult to apply to policy and make a decision.

The council local environmental quality team supports engagement with the artistic Community particularly through a co-ordinating single point of contact.

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	SCRER
Title of proposed change	Reinstatement of Graffiti service
Name of Officer carrying out Equality Analysis	Daniel Shepherd

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

It is proposed to reinstate the Graffiti cleaning service within the borough.

The graffiti service was reduced in 2020/21 as result of the serious governance and financial challenges that Croydon Council faced and formed part of the financial recovery agreed in the first phase of the Croydon Renewal Plan. The service was reduced to focus on offensive graffiti only from both public and private land. In the year before the service reduction, the service removed approximately 12,000 items of graffiti, with 262 of these being classed as 'offensive' graffiti.

Tackling graffiti is a growing problem across the borough with an urgent need to reduce the negative impact it has on local areas and quality of life for residents and businesses.

Linked to this report are plans to increase resources to tackle unwelcome, antisocial, and offensive graffiti. This will allow graffiti enforcement and removal resources to focus on where they are needed, to improve local environmental quality, help reduce fear of crime and increase resident satisfaction.

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>The reinstatement of the Graffiti removal service is intended to reduce illegal, antisocial and offensive graffiti from the borough and protect street art, which can positively contribute to the appearance of an area, attract visitors and is good for business.</p> <p>It is said that graffiti, creating a negative perception of an area, contributes to people's fear of crime and increase worries about anti-social behavior. Removing and reducing graffiti and protecting street art will give a positive impact on not only the residents near the hotspots but businesses, visitors, those who work and study in the borough, as a graffiti free environment will help people feel safe.</p> <p>There is no data on perceptions of safety or instances of graffiti relating to this characteristic</p>	<p>Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.</p>	<p>Draft Graffiti Policy In the year 2019/20 the Environmental Response team removed approximately 12,000 items of graffiti. https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf Page 19</p> <p>There is no data on perceptions of safety or instances of graffiti relating to this characteristic</p> <p>ONS 2022</p> <ul style="list-style-type: none"> • 97,900 0-19 year olds. This is the highest in London. (2021 Census) • 239,700 20-64 year olds. This is the highest in London. (2021 Census) • 53,100 65+ year olds. This is the 3rd highest in London. (2021 Census)
Disability	<p>The reinstatement of the Graffiti removal service is intended to reduce illegal, antisocial and offensive graffiti from the borough and protect street art, which can positively contribute to the appearance of an area, attract visitors and is good for business.</p> <p>It is said that graffiti, creating a negative perception of an area, contributes to people's fear of crime and increase worries about anti-social behavior. Removing and reducing graffiti and protecting street art will give a positive impact on not only the residents near the hotspots but businesses, visitors, those who work and study in the borough, as a</p>	<p>Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.</p>	<p>Draft Graffiti Policy In the year 2019/20 the Environmental Response team removed approximately 12,000 items of graffiti. https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf Page 19</p> <p>There is no data on perceptions of safety or instances of graffiti relating to this characteristic</p>

	graffiti free environment will help people feel safe.		Census 2011 tells us that 6.7% of Croydon residents have their day-to day activities limited a lot
Sex	<p>The reinstatement of the Graffiti removal service is intended to reduce illegal, antisocial and offensive graffiti from the borough and protect street art, which can positively contribute to the appearance of an area, attract visitors and is good for business.</p> <p>It is said that graffiti, creating a negative perception of an area, contributes to people's fear of crime and increase worries about anti-social behavior.</p> <p>Removing and reducing graffiti and protecting street art will give a positive impact on not only the residents near the hotspots but businesses, visitors, those who work and study in the borough, as a graffiti free environment will help people feel safe.</p>	Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.	<p>Draft Graffiti Policy</p> <p>In the year 2019/20 the Environmental Response team removed approximately 12,000 items of graffiti.</p> <p>https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf Page 19</p> <p>Also, see page 21 of the same report where the survey of women and girls suggests that there is a higher % of women and girls who feel less safe in the areas where they are resident.</p> <p>If we look at perception of safety of where people live, then in the same 12.4% say a bit unsafe, and 4.5% Not safe at all.</p> <p>When broken down by women and girls (P21), this increases to "a bit unsafe 37.1%", and "not safe at all 13.2%".</p> <p>ONS 2021</p> <p>(51.9%) residents in Croydon are female and 187,800 are male (48.1%)</p>
Gender Reassignment Identity	The reinstatement of the Graffiti removal service is intended to reduce illegal, antisocial and offensive graffiti from the borough and protect street art, which can positively contribute to the appearance of an area, attract visitors and is good for business.	Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.	<p>Draft Graffiti Policy</p> <p>In the year 2019/20 the Environmental Response team removed approximately 12,000 items of graffiti.</p>

	<p>It is said that graffiti, creating a negative perception of an area, contributes to people's fear of crime and increase worries about anti-social behavior. Removing and reducing graffiti and protecting street art will give a positive impact on not only the residents near the hotspots but businesses, visitors, those who work and study in the borough, as a graffiti free environment will help people feel safe.</p>		<p>https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf Page 19</p> <p>There is no data on perceptions of safety or instances of graffiti relating to this characteristic</p> <p>No borough data at this time N/A Data unavailable until end 2022</p>
<p>Marriage or Civil Partnership</p>	<p>The reinstatement of the Graffiti removal service is intended to reduce illegal, antisocial and offensive graffiti from the borough and protect street art, which can positively contribute to the appearance of an area, attract visitors and is good for business.</p> <p>It is said that graffiti, creating a negative perception of an area, contributes to people's fear of crime and increase worries about anti-social behavior. Removing and reducing graffiti and protecting street art will give a positive impact on not only the residents near the hotspots but businesses, visitors, those who work and study in the borough, as a graffiti free environment will help people feel safe.</p>	<p>Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.</p>	<p>Draft Graffiti Policy</p> <p>In the year 2019/20 the Environmental Response team removed approximately 12,000 items of graffiti.</p> <p>https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf Page 19</p> <p>There is no data on perceptions of safety or instances of graffiti relating to this characteristic</p> <p>The borough data on marital status is as follows: 43% married, 39% single, 11% divorced or separated.</p> <p>In 2011, 796 people in Croydon were in a registered same-sex civil partnership. This was 0.3% of the 16+ population.</p> <p>ONS 2021</p>

Religion or belief	<p>The reinstatement of the Graffiti removal service is intended to reduce illegal, antisocial and offensive graffiti from the borough and protect street art, which can positively contribute to the appearance of an area, attract visitors and is good for business.</p> <p>It is said that graffiti, creating a negative perception of an area, contributes to people's fear of crime and increase worries about anti-social behavior.</p> <p>Removing and reducing graffiti and protecting street art will give a positive impact on not only the residents near the hotspots but businesses, visitors, those who work and study in the borough, as a graffiti free environment will help people feel safe.</p>	<p>Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.</p>	<p>Draft Graffiti Policy In the year 2019/20 the Environmental Response team removed approximately 12,000 items of graffiti.</p> <p>https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf Page 19</p> <p>There is no data on perceptions of safety or instances of graffiti relating to this characteristic</p> <p>Census 2011 data tells us that 56.4% of Croydon residents are Christian, 8.1% Muslim, 6% Hindu , 20% have no religion, and 7.6% did not state a religion</p>
Race	<p>The reinstatement of the Graffiti removal service is intended to reduce illegal, antisocial and offensive graffiti from the borough and protect street art, which can positively contribute to the appearance of an area, attract visitors and is good for business.</p> <p>It is said that graffiti, creating a negative perception of an area, contributes to people's fear of crime and increase worries about anti-social behavior.</p> <p>Removing and reducing graffiti and protecting street art will give a positive impact on not only the residents near the hotspots but businesses, visitors, those who work and study in the borough, as a graffiti free environment will help people feel safe.</p>	<p>Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.</p>	<p>Draft Graffiti Policy In the year 2019/20 the Environmental Response team removed approximately 12,000 items of graffiti.</p> <p>https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf Page 19</p> <p>There is no data on perceptions of safety or instances of graffiti relating to this characteristic</p> <p>GLA 2015, and gov.uk current data</p> <p>GLA 2105 data states that 54% of Croydon residents describe themselves as ethnic minority/mixed.</p>

Sexual Orientation	<p>The reinstatement of the Graffiti removal service is intended to reduce illegal, antisocial and offensive graffiti from the borough and protect street art, which can positively contribute to the appearance of an area, attract visitors and is good for business.</p> <p>It is said that graffiti, creating a negative perception of an area, contributes to people's fear of crime and increase worries about anti-social behavior. Removing and reducing graffiti and protecting street art will give a positive impact on not only the residents near the hotspots but businesses, visitors, those who work and study in the borough, as a graffiti free environment will help people feel safe.</p>	<p>Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.</p>	<p>Draft Graffiti Policy In the year 2019/20 the Environmental Response team removed approximately 12,000 items of graffiti. https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf Page 19</p> <p>There is no data on perceptions of safety or instances of graffiti relating to this characteristic</p> <p>We do not currently collect data on this characteristic, a working party has been developed to improve data collection.</p>
Pregnancy or Maternity	<p>The reinstatement of the Graffiti removal service is intended to reduce illegal, antisocial and offensive graffiti from the borough and protect street art, which can positively contribute to the appearance of an area, attract visitors and is good for business.</p> <p>It is said that graffiti, creating a negative perception of an area, contributes to people's fear of crime and increase worries about anti-social behavior. Removing and reducing graffiti and protecting street art will give a positive impact on not only the residents near the hotspots but businesses, visitors, those who work and study in the borough, as a graffiti free environment will help people feel safe.</p>	<p>Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.</p>	<p>Draft Graffiti Policy In the year 2019/20 the Environmental Response team removed approximately 12,000 items of graffiti. https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf Page 19</p> <p>There is no data on perceptions of safety or instances of graffiti relating to this characteristic</p> <p>There were 5,252 births in Croydon in 2020.</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
No further consultation required	N/A	N/A

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 PROTECTED GROUP	Column 2 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	Column 3 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	Column 4 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	1
Disability	1	1	1
Sex	2	2	4
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

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	Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.	Street Art to be agreed in line with the Council's Graffiti policy.	Unknown	N/A
Race	Artistic right to expression may be taken away, however the Council's	Street Art to be agreed in line with the Council's Graffiti policy.	Unknown	N/A

Equality Analysis

	policy sets out an approach to Street Art where such art is agreed.			
Sex	Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.	Street Art to be agreed in line with the Council's Graffiti policy.	Unknown	N/A
Gender reassignment identity	Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.	Street Art to be agreed in line with the Council's Graffiti policy.	Unknown	N/A
Sexual orientation	Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.	Street Art to be agreed in line with the Council's Graffiti policy.	Unknown	N/A
Age	Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.	Street Art to be agreed in line with the Council's Graffiti policy.	Unknown	N/A
Religion or belief	Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.	Street Art to be agreed in line with the Council's Graffiti policy.	Unknown	N/A
Pregnancy or maternity	Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.	Street Art to be agreed in line with the Council's Graffiti policy.	Unknown	N/A
Marriage/civil partnership	Artistic right to expression may be taken away, however the Council's	Street Art to be agreed in line with the Council's Graffiti policy.	Unknown	N/A

	policy sets out an approach to Street Art where such art is agreed.			
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6. Decision on the proposed change

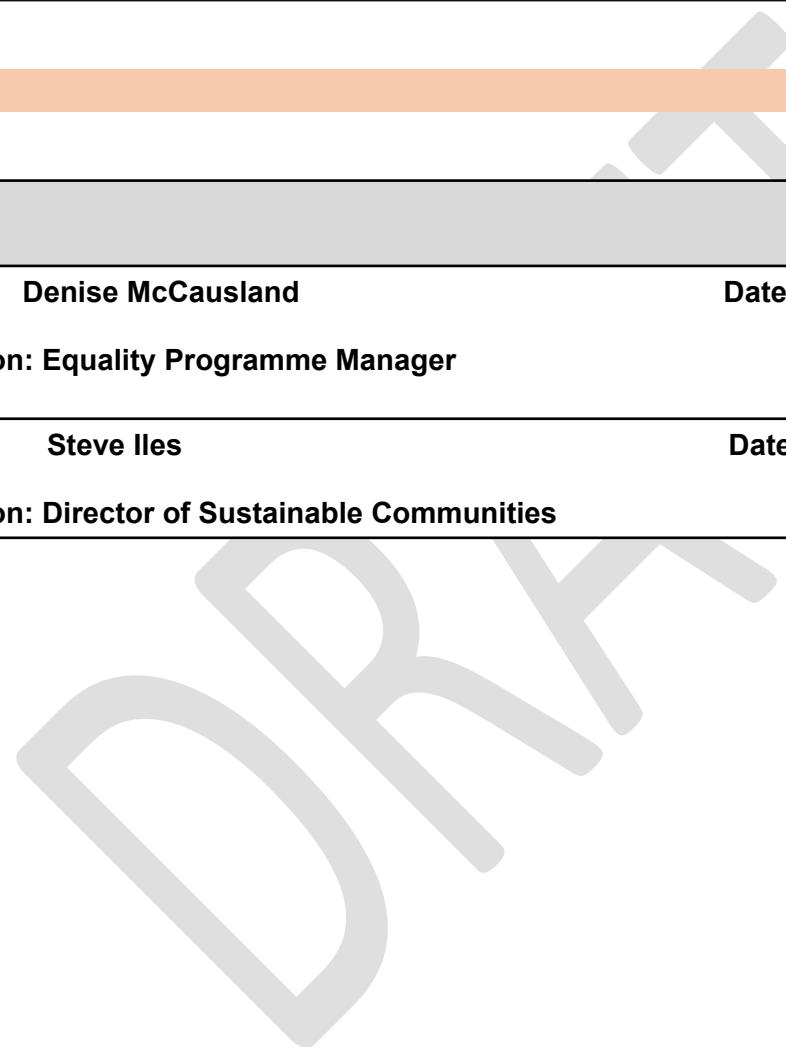
Based on the information outlined in this Equality Analysis enter **X** in column 3 (**Conclusion**) alongside the relevant statement to show your conclusion.

Decision	Definition	Conclusion - Mark 'X' below
No major change	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. The intention is to reinstate the graffiti cleaning service, borough-wide. It will be available to all sections of community, and will be the same service to all.	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? Cabinet		Meeting title: Cabinet

	Date:12/10/22
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7. Sign-Off

Officers that must approve this decision		
Equalities Lead	Name: Denise McCausland	Date: 25 August 2022
	Position: Equality Programme Manager	
Director	Name: Steve Iles	Date: 29th September 2022
	Position: Director of Sustainable Communities	



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Agenda Item 7

REPORT TO:	Cabinet 12 October 2022
SUBJECT:	Report on the results of informal public consultations on 11 Healthy School Streets (Pedestrian & Cycle Zone only)
LEAD OFFICER:	Nick Hibberd – Corporate Director of Sustainable Communities, Regeneration & Economic Recovery Steve Iles - Director of Sustainable Communities
CABINET MEMBER:	Councillor Scott Roche Cabinet Member for Streets & Environment
WARDS:	Multiple

SUMMARY OF REPORT:

The implementation of further Healthy School Streets (HSS) builds on the council's commitment to making streets outside our schools safer and healthier for children, parents, and residents.

This report presents the results of the informal consultation, which sought the public's view on the possible introduction of 11 new Healthy School Streets under Experimental Traffic Management Orders (ETMOs) for a maximum period of 18 months. The consultation was carried out over a one month period between 1 July 2022 to 30 July 2022.

The informal consultation was across multiple channels, including distribution of 8,345 letters and messaging on the council's website and social media channels. However, we unfortunately received a low response rate, with only 531 responses received (representing a 6% response rate). The importance of community feedback is recognised and to ensure we are listening to the community the recommendation is that the proposed schemes are taken forward as experiments to allow the community to assess the "real" impacts of the schemes.

Although, the council consulted on 11 Healthy School Street schemes, officers are recommending to the Executive Mayor of Croydon that only 9 Healthy School Street schemes are taken forward for implementation, with 2 schemes not being taken forward, as listed in the tables below.

This recommendation is being made following comprehensive analysis of the consultation responses received together with the council's assessment on the anticipated benefits of the schemes.

9 schemes to be progressed to ETMO:

Ref:	School Name(s)	Affected Road (s)	Ward (s)
HSS 1	The Crescent Primary School & Brit School	The Crescent & Saracen Close	Selhurst
HSS 3	South Norwood Primary School	Birchanger Road, Crowther Road & Gresham Road	South Norwood

HSS 4	St Cyprians Greek Orthodox Primary School	Ingram Road & Springfield Road	Norbury Park
HSS 5	Howard Primary School	Dering Place & Barham Road	Waddon
HSS 6	Oasis Shirley Park	Stroud Green Way	Shirley North
HSS 7	Good Shepherd Catholic School	Dunley Drive & Walker Close	New Addington North
HSS 8	Kenley Primary School	Mosslea Road & New Barn Lane	Kenley
HSS 9	Gonville Academy	Gonville Road	West Thornton
HSS 10	Park Hill Junior & Infants School	Stanhope Road & The Avenue	Park Hill & Whitgift

2 schemes not being progressed to ETMO:

Ref:	School Name(s)	Affected Road (s)	Ward (s)
HSS 2	Harris Academy South Norwood	Cumberlow Avenue	South Norwood
HSS 11	Krishna Avanti Primary School	Southbridge Place	Waddon

The report further sets out the following:

1. Background information on the council's Healthy School Street programme.
2. Highways and Parking Service's agreed consultation and engagement strategy for Healthy School Streets
3. Consultation methodology and analysis
4. Details on schemes recommended to be taken forward for implementation with agreed amendments
5. Design drawings of all proposed 11 Healthy School Streets as consulted upon labelled as **Appendix A**
6. Consultation leaflets for all proposed 11 Healthy School Street schemes labelled as **Appendix B**
7. Design drawings of the proposed amendments to 1 out of the 9 schemes recommended to be taken forward for implementation labelled as **Appendix C**
8. Equalities Impact Assessment, **Appendix D**
9. Data Protection Impact Assessment, **Appendix E**
10. Consultation analysis, **Appendix F**

Should the schemes be agreed for implementation under an 18 month ETMO, officers will produce a future report outlining any objections received during the 6 month objection period and make further recommendations on whether the schemes should be made permanent or not. The report will be produced within the ETMO period (within 18 months from implementation date).

FINANCIAL IMPACT:

- The introduction of the proposed Experimental Traffic Management Orders (ETMOs) including officer time and on-street changes is estimated to be £230,000

- In addition, the cost of collecting monitoring data (both traffic and air quality data) is estimated to be £60,000

Budget to meet these costs is available from the operational capital budget for Parking.

If motorised vehicles, without exemption permits, were to enter the pedestrian and cycle zone they would be contravening the motorised vehicle restriction and would be subject to Penalty Charge Notice (PCN). The surplus income generated from PCNs is ringfenced for transport initiatives and the Freedom Pass.

The delivery of the 9 schemes recommended to be taken forward is consistent with the budget approved by the council for 2022/23 financial year.

KEY DECISION REFERENCE NO.: 4522EM 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 Executive Mayor has the power to make the decisions set out in the recommendations contained within this report. The Executive Mayor agrees to the following subject to compliance with statutory requirements:

RECOMMENDATIONS:

- i. Officers from the council's Highways & Parking Service recommend to the Executive Mayor of Croydon that the following 9 Healthy School Street schemes are taken forward for implementation under ETMOs, with proposed amendments to HSS 10 scheme as detailed in this report:

Ref:	School Name(s)	Affected Road (s)	Ward (s)
HSS 1	The Crescent Primary School & Brit School	The Crescent & Saracen Close	Selhurst
HSS 3	South Norwood Primary School	Birchanger Road, Crowther Road & Gresham Road	South Norwood
HSS 4	St Cyprians Greek Orthodox Primary School	Ingram Road & Springfield Road	Norbury Park
HSS 5	Howard Primary School	Dering Place & Barham Road	Waddon
HSS 6	Oasis Shirley Park	Stroud Green Way	Shirley North
HSS 7	Good Shepherd Catholic School	Dunley Drive & Walker Close	New Addington North
HSS 8	Kenley Primary School	Mosslea Road & New Barn Lane	Kenley
HSS 9	Gonville Academy	Gonville Road	West Thornton

	HSS 10	Park Hill Junior & Infants School	Stanhope Road & The Avenue (<i>as amended</i>)	Park Hill & Whitgift
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If the above recommended school streets are agreed to proceed, the following will need to form part of the decision to ensure that the experimental schemes progress smoothly during the 18-month trial period.

- i. Provide the relevant delegated authority to the Road Space Manager, Sustainable Communities Division to make the required ETMOs which will be valid for a maximum period of 18 months. The first 6 months will serve as the statutory objection period.
- ii. Authorise officers to implement relevant parking, waiting and/or loading restrictions required to support the successful operation of the experimental school street schemes.
- iii. Authorise officers to install the relevant equipment that allows the collection of traffic and air quality data for the 9 School Street sites.

1. Executive Summary

- 1.1 The purpose of this report is to outline the results of the informal consultation carried out on the introduction of 11 new Healthy School Street (HSS) schemes under Experimental Traffic Management Orders (ETMOs) for a maximum period of 18 months. Based on the outcome of the consultation, this report makes recommendations to and seeks authorisation from the Executive Mayor of Croydon to implement 9 of the 11 Healthy School Streets schemes consulted upon as detailed in this report.
- 1.2 Healthy School Street schemes help the school communities to tackle concerns around air pollution, poor health, and road danger. They are implemented by restricting motorised traffic from entering the road (s) outside the school at drop – off and pick – up times. This results in a safer, healthier, and pleasant environment for all. The intended outcomes are to achieve healthier lifestyles, active travel, and better street environment.
- 1.3 Key to the success of any Healthy School Street scheme is comprehensive consultation and engagement with the community. The council is keen to seek views when shaping highway improvement schemes.
- 1.4 The Executive Mayor’s pledge prior to his election was that he wanted to ensure the council listens to the community. To ensure we are taking on board the valuable feedback from community, the council has an agreed two step approach to implementation of these School Street schemes. The first step is the informal public consultation stage, where we seek the community’s views informally on the council’s intention to introduce Healthy School Streets.
- 1.5 Given the relatively low response rate to the informal consultation (only 6% of those consulted responded) it is important that the community can inform the council of their views on the schemes in another way. The mechanism to achieve this will be to implement the schemes as experiments and invite

comments. This will allow the community to assess the “real” impacts of the schemes. These experiments will be implemented using Experimental Traffic Management Orders (ETMOs), which include an initial 6-month statutory objection period, during which the public is invited again, to formally submit objections on the schemes.

- 1.6 This report together with the supporting appendices presents the results and officer findings of the above explained informal consultation to Executive Mayor of Croydon for decision making on the future of the mentioned 11 Healthy School Street schemes.
- 1.7 The findings of the informal public consultation have been summarised below:
- 8,345 leaflets delivered across all 11 HSS schemes within the agreed 250m consultation areas.
 - 531 responses received from within the 250m consultation area. This represents a response rate of 6%, this is far less than the average response rate of 10% expected for similar consultations.
 - The council received 358 responses from those beyond the 250m area that wouldn't have received a council issued leaflet.
 - Total responses combined from both within and outside is 889
 - Across all 11 HSS schemes the response rate in favour from those within the 250m consultation area is 40% (212) 60% (319) not in favour.
 - Across all 11 HSS schemes the response rate in favour from those outside the consultation area is 39% (140), 60% (215) not in favour and 1% (3) undecided.

2. BACKGROUND

- 2.1 The council wants Croydon's streets to be safe spaces for the public to walk and cycle, for children to get to and from school safely, for businesses to grow and for the air that we all breathe to be cleaner.
- 2.2 Croydon intends to ensure that the borough has a cleaner, sustainable recovery from the pandemic encouraging healthier travel helping us to deliver Croydon's Transport Strategy and more widely the London Mayoral Transport Strategy. To help address challenges coming out of the pandemic around climate change, congestion, road safety issues and poor air quality.
- 2.3 The council's Parking Policy 2019-2022 aims to effectively manage parking provision across the borough in line with the Corporate Plan and the borough's growth objectives. Section 4 of this policy details the School Streets objectives, to ensure we secure a healthy and safe environment near to schools and to help children and parents use cars less and to walk, cycle and use public transport more. The school run presents a particularly harmful combination of air pollution and inactivity for our children and parents.
- 2.4 The Coronavirus (COVID-19) pandemic has changed how people live, study, work, and travel in Croydon. The start of the pandemic saw the public

alternating their daily routines, with a lot more people choosing to work from home and using local streets for exercise and leisure. This change in people's habits have made homes, local streets, neighbourhoods, and the local public realm more important than ever.

Evidence for Healthy School Streets:

- 2.5 The health impacts on children from air pollution and inactivity is not alleviated until a significant proportion of parents stop non-essential car use. Parents will not stop using the car until the school entrance feels safe. The causal link tells us that addressing the perception of road safety near to the school entrance can impact positively on air quality and health.
- 2.6 School street traffic at the start and end of the school day does not relate solely to the school run. In some school roads there is also an element of commuter traffic using the road as a so-called rat run. The amount of such commuter traffic is additionally influenced by the increased car ownership and use.
- 2.7 Several school roads have reached saturation point at the start and end of school days – meaning that in the most severe places there is practically no road space left for the problem to worsen. What is changing, however, is the awareness of and attitude towards air pollution. In Croydon's online public engagement survey carried out in September 2018¹, 86% of 994 respondents agreed that traffic levels are too high in Croydon and 72% agreed it should be lowered. 74% agreed they are concerned about air quality. 62% agreed they would use the car less if the alternatives were better. 57% agreed they would walk more and 39% would cycle more if conditions were right.
- 2.8 Those residents that live on a street home to a school, find their street to be exceptionally congested, polluted, and unsafe every weekday at pick up and drop off times. As a result, they struggle to enjoy the streetspace outside their home for play and active travel. School run-related traffic accounts for a quarter of cars on the road and adds 254,000 vehicles a day in London alone.
- 2.9 The council has already 14 successful permanent Healthy School Streets in place since 2017, with an additional 10 installed in April 2022 under ETMOs taking the total to 24. These schemes are welcomed by the schools and pupils they serve. Over time they do result in a shift from staff, parents and pupils relying on the motor vehicle to travel to and from school to using more sustainable forms of transport. This has a positive impact on the local street environment and the health of young children.
- 2.10 The DfT continues to expect boroughs to introduce measures that reallocates road space to people walking and cycling. The focus post-pandemic is now on devising further schemes and assessing temporary schemes installed during the pandemic with a view to making them permanent. Healthy School Streets are part of that initiative and commitment to introduce schemes that continue to encourage sustainable active travel. For those that must use a car to travel to and from school such as persons with disabilities or a need to carryout statutory

functions for which a motor vehicle is essential, the council has an agreed permit and exemption scheme in place administered by the council's Highways & Parking Service.

- 2.11 The table below indicates the average distance that would be travelled in minutes if pupils and parents opted to cycle or walk to and from their school. The travel time is estimated based on how far 75% of pupils in attendance live from the given school. The data used has been taken from the latest available information on: <https://maps.london.gov.uk/schools/>. Data for Krishna Avanti School and Oasis Shirley Park wasn't available as these schools were opened after the latest data had been captured.

Ref:	School Name(s)	75% of pupils live within X min walking distance	75% of pupils live with x min cycling distance
HSS 1	The Crescent Primary School & Brit School	20 minutes	8 minutes
HSS 2	Harris Academy South Norwood	20 minutes	8 minutes
HSS 3	South Norwood Primary School	12 minutes	4 minutes
HSS 4	St Cyprians Greek Orthodox Primary School	35 minutes	15 minutes
HSS 5	Howard Primary School	12 minutes	4 minutes
HSS 6	Oasis Shirley Park	No data available	No data available
HSS 7	Good Shepherd Catholic School	15 minutes	6 minutes
HSS 8	Kenley Primary School	40 minutes	18 minutes
HSS 9	Gonville Academy	12 minutes	4 minutes
HSS 10	Park Hill Junior & Infants School	10 minutes	3 minute
HSS 11	Krishna Avanti Primary School	No data available	No data available

The table above shows the following:

- 9 out of the 9 schools can be reached by bike in less than 20 minutes by 75% of pupils based on the place of abode.
- 7 out of the 9 schools can be reached by bike in less than 10 minutes by 75% of pupils based on the place of abode.
- 7 out of the 9 schools can be reached by walking in 20 minutes or less by 75% of pupils based on the place of abode.
- 5 out of the 9 schools can be reached by walking in 15 minutes or less by 75% of pupils based on the place of abode.

Why existing control measures are no longer effective:

- 2.12 A weakening in conventional parking control measures at schools has resulted from the Deregulation Act 2015. Prior to the Act, a camera vehicle was a strong deterrent to parking contraventions near to school entrances. A single camera

vehicle could efficiently cover many schools daily. Public opinion however perceived this method of enforcement as being over-zealous and the 2015 Act removed the powers to use camera enforcement for most parking contraventions. Camera enforcement is now mainly associated with moving traffic offences.

- 2.13 Manual enforcement, by patrolling Civil Enforcement Officers (CEO), is a weaker deterrent to parking contraventions near to school entrances. School parents tends to wait in or near to their vehicles and will simply move on once a CEO shows up and starts recording vehicle details. Most will simply drive around the block and park up again once the CEO has left the road. It is practically impossible to have permanent presence of CEO's for moving on drivers at the more than 130 schools in the borough.
- 2.14 The manual method of enforcement also regularly results in undesirable incidents of arguments and foul language from drivers, which can be intimidating and set a bad example in front of the children.

How will the council measure success?

- 2.15 Healthy School Streets are not an isolated device. It supports the educational and information efforts of the Council's Road Safety and School Travel Planners, including their coordination with the TfL STARS and Living Street's WoW Travel Tracker initiatives. STARS aims to inspire young Londoners to travel to school sustainably, actively, responsibly, and safely by championing walking, scooting and cycling. Living Streets is a charity that inspires the nation to walk more. WOW is a pupil-led initiative where children self-report how they get to school every day using the interactive WOW Travel Tracker.
- 2.16 A formal 6-month objection period will commence from the date the ETMOs come into force. This will provide the public a further opportunity to express their views on the schemes being made permanent. Officers will review the objections made and attempt to address them during the objection period. An option to amend the schemes in response to feedback given is available to officers to better the schemes if it's found that amendments are feasible and beneficial to the local community. However, any changes to the scheme may result in a restart of the 6-month ETMO objection period.
- 2.17 The council will call on the affected schools to participate in monitoring the impacts of the scheme. The schools can support the schemes by carrying out what are known as 'Hands Up Surveys' both before and after the schemes are implemented. The surveys are conducted in the school environment whereby pupils are asked the method of travel to and from school before the scheme has been implemented a similar survey is carried out after the school street is installed to determine if the method of travel has now changed. For example, a survey conducted may show that a high number of pupils were travelling to and from school by car, but since its implementation they are now walking instead.
- 2.18 The council will carry out its own monitoring through the installation lamp column mounted sensors that monitor all types of traffic in real time 24/7 with data uploaded on a portal that can be accessed directly by officers. The data will allow

us to understand behavioural trends and interactions between transport modes. The sensors are installed before the implementation of the agreed HSS schemes to capture an accurate baseline and this is compared with the data gathered following the implementation of the scheme to identify any changes in behaviour.

- 2.19 For Air Pollution monitoring they council will be installing Breathe London Sensors. Breathe London, maps and monitors air pollution across London, with over 100 sensors installed by Breathe London alone in 2019 and further funding granted to Breathe London for a further 100 in 2021 by the Mayor of London. Using Breathe London for air pollution monitoring allows us to compare air pollution data local to Croydon to other parts of the capital. The Breathe London sensors will be installed outside the school before the scheme is installed and will be monitored throughout the experimental period to determine if the scheme has had an impact on air pollution. Its anticipated a reduction in air pollution will be observed during school street operational hours.
- 2.20 For further information on the policy objectives and the evidence in support for implementation of Healthy School Streets please refer to sections 2 – 3 of the Schools Streets Traffic Management Advisory Committee Report (TMAC) dated May 2019, which can be found by clicking [here](#).

3. PROPOSALS

- 3.1 The council consulted on 11 Pedestrian and Cycle Zone only schemes, more commonly known as Healthy School Street schemes. The council proposed all the 11 Healthy School Street schemes operate between the hours of 08.00 – 9.30am and 2-4pm Mon – Fri during school term time only. Several agreed permits or exemptions are made available to permit access during the periods of restriction for those that need it as detailed below. The operational times and agreed exemptions are consistent with those that apply to the existing 24 Healthy School Street schemes in operation across the borough. The streets selected for a proposed School Street scheme were because both the school and residents had reported to the council problems with traffic, congestion, noise and air pollution during pick up/drop off times.

- 3.2 The table below set out the scheme proposals consulted on and the roads that the zone would affect:

Ref:	School Name(s)	Affected Road (s)	Ward (s)
HSS 1	The Crescent Primary School & Brit School	The Crescent & Saracen Close	Selhurst
HSS 2	Harris Academy South Norwood	Cumberlow Avenue	South Norwood
HSS 3	South Norwood Primary School	Birchanger Road, Crowther Road &	South Norwood
HSS 4	St Cyprians Greek Orthodox Primary	Ingram Road & Springfield Road	Norbury Park

Ref:	School Name(s)	Affected Road (s)	Ward (s)
HSS 5	Howard Primary	Dering Place &	Waddon
HSS 6	Oasis Shirley Park	Stroud Green Way	Shirley North
HSS 7	Good Shepherd Catholic School	Dunley Drive & Walker Close	New Addington North
HSS 8	Kenley Primary School	Mosslea Road & New Barn Lane	Kenley
HSS 9	Gonville Academy	Gonville Road	West Thornton
HSS 10	Park Hill Junior & Infants School	Stanhope Road & The Avenue	Park Hill & Whitgift
HSS 11	Krishna Avanti Primary School	Southbridge Place	Waddon

4. INFORMAL PUBLIC CONSULTATION

- 4.1 The informal consultation stage is an early engagement for purpose of gauging opinions and receiving feedback to verify the initial assumptions for a proposal. It is an invitation to residents, businesses and occupiers/operators of amenities in the locality to contribute their first-hand experiences and observations that are otherwise not obviously available to the local authority officers. The consultees were invited to propose changes to the initially suggested zone layout. The engagement effectively enables people in the locality to co-design the scheme.
- 4.2 The consultation launched on 1 July 2022 and expired at midnight on 30 July 2022. It was published on all digital platforms in tandem with announcements made about the consultation through a council press release and newsletter. In total 8,345 leaflets were delivered, and 531 responses were received, representing a response rate of 6%, the average response rate from consultations in Croydon 10%. All 11 consultation leaflets issued have been appended to this report labelled as Appendix B. Note: the response rate is based on the number of leaflets delivered to those within the consultation area (250 metre boundary) and responses received from the same only.
- 4.3 **250metre consultation boundary:** To fully understand and appreciate the consultation analysis as presented in this report, it is important to note the consultation boundary, its definition and categorisation.
- 250metre boundary: the council has chosen to consult properties that fall within 250metres of the extents of the proposed healthy school street scheme by sending them a consultation leaflet. This is consistent with the method use previously when consulting on the existing 24 school streets.
 - The distance of 250 metres is measured as road length from the various entry points to any one scheme.
 - For analysis purposes those properties that fall within 250metres from the extents of the school street proposal that would have received a consultation leaflet are categorised as responses from properties “**Within the area**”. Those responses received from persons beyond the 250metre consultation

boundary are categorised as responses from “**Outside the area**”, this could be responses from those live, work, study anywhere in Croydon and beyond it is an undefined area as anyone who feel that they may be impacted by the proposals can respond.

Analysis of responses from those **within** the consultation boundary and those from **outside** is important because depending on how close they live, work or study to the proposals, the impacts you feel or perceive could vary, therefore the feedback given will be different.

In line with good practice the council installed street notices in the vicinity of the school. The council has an active internal communications and engagement team that made announcements and publications in relation to the consultation via various means these have been detailed below with links to the relevant publications:

- 1) Your Croydon: <https://news.croydon.gov.uk/croydon-proposes-11-new-healthy-school-street-schemes-consultation-launches-today/>
- 2) I Love Croydon Facebook page
- 3) I Love Croydon Instagram page
- 4) I Love Croydon Twitter Account:
<https://mobile.twitter.com/yourcroydon/status/1547651390935166981>
- 5) The council has a dedicated Healthy School Streets website (www.croydon.gov.uk/school-streets), where the consultation material was published along with background information on the councils Healthy School Street programme
- 6) A dedicated Healthy School Streets email was set-up for enquiries – healthyschoolstreets@croydon.gov.uk

The tables below provide summary results across the 11 schemes:

All 11 School Proposals			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	8345	531	319	212	-
		6%	60%	40%	
Outside consultation area	-	358	215	140	3
			60%	39%	1%
Total	8345	889	534	352	3
			60%	40%	0%

The Crescent Primary School			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	1306	48	23	25	-
		4%	48%	52%	
Outside consultation area	-	55	37	17	1
			67%	31%	2%
Total	1306	103	60	42	1
			58%	41%	1%

Harris Academy South Norwood			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	884	13	10	3	-
		1%	77%	23%	
Outside consultation area	-	5	2	3	-
			40%	60%	
Total	884	18	12	6	-
			67%	33%	

South Norwood Primary School			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	1417	72	56	16	-
		5%	78%	22%	
Outside consultation area	-	40	23	17	-
			58%	42%	
Total	1417	112	79	33	-
			71%	29%	

St Cyprian Greek Orthodox Primary School			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	643	65 10%	46 71%	19 29%	-
Outside consultation area	-	14	8 57%	6 43%	-
Total	643	79	54 68%	25 32%	-

Howard Primary School			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	854	23 61%	14 39%	9	-
Outside consultation area	-	28	12 43%	16 57%	-
Total	854	51	26 51%	25 49%	-

Oasis Shirley Park Primary School			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	485	33 7%	18 55%	15 45%	-
Outside consultation area	-	8	4 50%	4 50%	-
Total	485	41	22 54%	19 46%	-

Good Shepherd Catholic Primary			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	450	28 6%	12 43%	16 57%	-
Outside consultation area	-	44	29 66%	14 32%	1 2%
Total	450	72	41 57%	30 42%	1 1%

Kenley Primary School			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	307	62 20%	35 56%	27 44%	-
Outside consultation area	-	25	19 76%	6 34%	-
Total	307	87	54 62%	33 38%	-

Gonville Primary School			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	429	44 10%	13 30%	31 70%	-
Outside consultation area	-	31	16 52%	15 48%	-
Total	429	75	29 39%	46 61%	-

Stanhope Primary School			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	451	69 15%	38 55%	31 45%	-
Outside consultation area	-	50	22 44%	27 54%	1 2%
Total	451	119	60 50%	58 49%	1 1%

Krishna Avanti Primary School			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	1119	74 7%	54 73%	20 27%	-
Outside consultation area	-	58	43 74%	15 26%	-
Total	-	132	97 73%	35 27%	-

4.4 In summary the results overall show that those responded are opposed to the introduction of HSS schemes, however officers believe this is primarily attributed to the following 3 elements:

- 1) Low response rate – the consultation only received an average response rate of 6%, suggesting further engagement is required. Given the relatively low response rate to the informal it is important that the community can inform the council of their views on the schemes in another way. The mechanism to achieve this will be to implement the schemes as experiments and invite comments. This will allow the community to assess the “real” impacts of the schemes. These experiments will implemented using Experimental Traffic Management Orders (ETMOs), which include an initial 6-month statutory objection period, during which the public is invited again, to formally submit objections on the schemes.

- 2) Displacement of traffic on surrounding roads – there is a perception that this will occur, but is not a given. Officers will measure the impacts of the scheme through extensive monitoring as described in this report, if the schemes are agreed to be implemented under ETMOs.
- 3) Access issues for deliveries etc – the council operates a flexible permit exception scheme. Several exemptions are offered and can be applied for in situations where legitimate access is needed.

4.5 As a result of the consultation analysis presented above and based on the council's own assessment of the schemes, officers recommend to the Executive Mayor of Croydon to proceed with all schemes to implementation under ETMO except for HSS 2 & HSS 11 for the following reasons:

4.6 **HSS 2 Cumberlow:** the school responded to say that pupils access the school primarily for the South Norwood High Street. The access on Cumberlow Avenue is used for deliveries and teachers, installing school street scheme here will not benefit the school or pupils, in fact it will have the opposite impact making it difficult for deliveries. South Norwood High Street, home to several businesses, several bus routes and a key access road cannot be converted into a school street.

4.7 **HSS 11 Southbridge Place:** the school responded to say that whilst it appreciates the council intention to implement a school street scheme, the school is not supportive of one, but instead would like the council to install other supplementary measures such as zebra crossing. The council's engineers have reviewed Southbridge Place and found that the road is one way, has a signed speed limit of 20mph, traffic calming is in place in the form of road humps. Narrow footways along Southbridge Place and the presence of parking bays mean that installation of zebra crossing is not feasible without a significant loss of on street parking and extensive engineering works to widen the footway to install a zebra crossing. As several traffic calming measures are already in place the council will not be installing further supplementary measures.

4.8 All the responses have been placed into 32 different themes; the following 10 themes have been identified as the most common:

Theme	Number of responses
The scheme will cause displacement of traffic and congestion	294 (55%)
The scheme will make it difficult for working parents, visitors, and residents	267 (50%)
The scheme will make it safer to go to school	172 (33%)
There should be better enforcement of existing restrictions	114 (21%)
The scheme is unnecessary	79 (15%)
The scheme will create unsafe surrounding roads	78 (14.55%)
The scheme will impact access for delivery vehicles and traders	74 (14%)
The scheme will cause additional pollution on side roads	69 (13%)

Extend scheme boundary	68 (12.8%)
Consider one way, no entry etc. as an alternative to proposal	60 (11%)

4.9 Whilst the above table lists out the top 10 response themes officers have focused on the top 4 most common re-occurring themes and provided a response to each one which is as follows:

4.10 Officer response to **Theme 1 – The scheme will cause displacement of traffic and congestion:** the schemes recommended for implementation will be installed under an Experimental Traffic Management (ETMO), this allows both the public and the council to realise and monitor the impacts of the schemes while they are in operation on the public highway. Some of other key benefits of installing schemes in this way are:

- Allows for an extended objection period. (6 months)
- Allows the council to make amendments to better the scheme in response to objections received during the 6-month statutory objection period.
- Allows the council to assess and monitor the impacts of a scheme on for example air quality and traffic.
- Allows decision makers to review the objections received and monitoring data during the experimental period before reaching a decision on retaining, replacing, or removing the experimental scheme before the end of the 18-month period.

4.11 The council will be installing traffic and air pollution equipment at all sites to monitor the impacts on traffic and pollution and report back on its findings. It is accepted that in the short term there may be a slight increase in displaced traffic to other roads as motorists get used to the new schemes and alter their choice of travel. School Streets do not simply shift traffic from one place to another. Instead, we see an overall reduction in the numbers of motor vehicles on roads, as people reduce the number of car journeys they make, take different routes, and replace some vehicle journeys with walking or cycling. This is known as ‘traffic evaporation’ and has been observed in numerous similar schemes around London. A study (carried out by Edinburgh Napier University and Sustrans) based on existing school streets implemented by various administrative authorities across the UK, showed that there is not significant displacement of parking near to school streets. The University website <https://www.napier.ac.uk/about-us/news/school-street-closures> contains a link to the published report from where the report can be downloaded. It found an uptake of more sustainable means of travel to and from schools located in ‘School Streets’ thereby reducing the overall number of car journeys. Croydon formed one of the administrative study areas featured in the report.

4.12 In addition to carrying out our own monitoring through on street equipment, the council will engage directly with the schools during the experimental period to determine if the benefits of the scheme have been felt by the school, its staff, and pupils. Schools are requested to carry out what are known as ‘hands up surveys’ asking pupils how they travel to and from school. There are compared with previous similar surveys carried out before the introduction of a scheme to determine if the school street has resulted in a change in the travel behaviour. As explained section 1 of this report installing schemes under a ETMO allows for

further engagement and provides another opportunity for those impacted by the scheme to voice their views through the statutory consultation mechanism. The latest available data shows that the school streets schemes installed so far have resulted in 15% to 25% reduction car use and 23% to 65% increase in active travel.

- 4.13 Officers acknowledge that several respondents have said that the scheme may cause dangerous driving on roads adjacent to the schemes. However, officers are of the view that a large concentration of motor traffic outside or close to the school gates where there is likely to be a high density of children is more dangerous heightening the risk of collision. Motor traffic spread over a large area or multiple streets is viewed to be better than traffic concentrated in one area or road causing congestion and air pollution. As explained above, during the first few weeks of a new traffic scheme being installed often short-lived disruption is observed overtime as motorists become accustomed to the scheme, they often find alternative routes or move to using more sustainable forms of travel. If a significant number of school related commuter traffic shifts from using motor vehicles to sustainable modes of travel the risk of collisions can be reduced further.
- 4.14 Officer response to **Theme 2 – The scheme will make it difficult for working parents, visitors, and residents:** The council has in place a suite of permits and exemptions to provide access for various users as detailed in the proposals section of this report. In certain circumstances, the exemptions can be extended to deliveries and visitors.
- 4.15 The council appreciates that the scheme may cause inconvenience to some working parents that drop off their children as well as reach their place of work in a short space of time during peak periods, however the safety of children who do walk and cycle to school is of a greater priority. Access for parents is not permitted to minimise the number of vehicles entering/exiting the school street during busy periods, unless they are parents/carers of children with disabilities. The scheme are only operational for short periods during weekdays and do not operate during school or public holidays. Residents are encouraged to arrange deliveries and visits outside of the operational hours. However, the council's Highways & Parking Service endeavour to accommodate a special access request on a case-by-case basis.
- 4.16 Officer response to **Theme 3 – the scheme will make it safer for children and the school:** Officers acknowledge this, and this is one of the key objectives of the scheme, it is encouraging to note that many respondents agree that the proposal will make it safer.
- Officer response to **Theme 4 - better enforcement of existing parking restrictions is needed:** this comment was found to be in two contexts both of which have been combined to create this theme. The context was:

- 1) Those that agreed with the scheme but also said that the council needs to better enforce other parking restrictions already in place.
- 2) Those that disagreed with the scheme and suggested that the council should better enforce existing parking restrictions already in place rather than coming up with new proposals.

Whilst the council would like to carry out more enforcement, limited resource means enforcement of all restrictions especially during peak periods across the borough can be challenging. The available resource is deployed in areas where there is a significant parking compliance concern or related road safety issue. School Street schemes will not take away precious resource as they are self-enforcing through automated cameras. As part of scheme installation officers will refresh line marking and introduce new parking restrictions where needed.

5. OFFICER CONCLUSION

- 5.1 The School Street schemes were proposed in response to calls by the local schools and residents to address concerns around poor air quality, traffic congestion and road safety on the named roads during school pick up/ drop off times. The council is leading on addressing the impacts of climate change, road safety and congestion outside schools by the introduction of series of school streets, with the first launched in 2017 and more recently an additional set of ten installed in April 2022. The council acknowledges that during the first few months of the school streets becoming operational there is likely to be some local disruption to normal travel patterns and behaviour, however studies show that as the scheme has an opportunity to bed in often the early disruption dissipates and a focus turns into the benefits of such schemes. For schemes where concerns around access and enforcement of existing restrictions have been raised, officers will remind residents of the suite of exemptions/permits available to them. For enforcement of existing restrictions officers will request this and refresh line markings to aid better parking practice.

6. OPTIONS CONSIDERED AND REJECTED

- 6.1 Option 1 not proceeding with the implementation of the 9 schemes under ETMO: officers are of the view that this would be a missed opportunity to relieve children, parents and residents from obstruction, road safety, air quality and inactivity problems resulting from traffic and parking. As explained previously installing the schemes under ETMOs will allow both the public and the council to appreciate and assess the true impacts of the schemes, providing those affected with a further opportunity to express their opinions views through statute. Officers have the option open to them to amend the schemes during the 18-month experimental period to better them or address any objections that come forward at this second stage.
- 6.2 Option 2 better enforcement in place of implementing school street schemes: increasing the conventional presence of Civil Enforcement Officers (CEOs) at peak times, as an alternative to the School Street, are demonstrated to be

insufficient in resolving the chaotic and, at times, hostile traffic conditions, which occurs in the space where children and cars co-exist. CEOs do not have powers to direct or enforce traffic with regards to resolving congestion and discouraging car use. It is practically impossible to provide a daily presence at each the 130 schools in the borough. The Council, and the London Mayor's office, are already working with schools and parents in other ways to encourage less car use; but nothing has yet emerged as equally effective as the combination School Street, in helping to reverse the trend of the many more children being driven to school.

7. REASONS FOR RECOMMENDATION

- 7.1 For the reasons set out in Section 2, 3 & 4 of this report officers conclude that 9 new Healthy School Streets are implemented under ETMOs with amendments made to 1 out of the 9 schemes. The new ETMOs are proposed to be made effective from January 2023 after the Christmas and New Year holidays, the 6 months consultation period will commence from said date.
- 7.2 The Council has reviewed and tried various options to reduce parking stress and improve safety around schools. The School Street schemes introduced to date have been successful as described in this report, so the recommendation is to introduce more such schemes where appropriate.
- 7.3 The schemes meet and support several of Croydon's transport objectives and priorities along with those within the Mayor of London's Transport Strategy. These are the reasons why officers recommend their implementation so that their effectiveness can be fully assessed.
- 7.4 Officers are of the view that information gained through the public's representations is highly valuable and will assist in officers improving the schemes especially in relation to enforcement.

8. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

8.1 Revenue and Capital consequences of report recommendations

The introduction of the proposed Experimental Traffic Management Orders (ETMOs) including officer time and on-street changes is estimated to be £230,000. In addition, the cost of collecting monitoring data (both traffic and air quality data) is estimated to be £60,000.

If motorised vehicles, without exemption permits, were to enter the pedestrian and cycle zone they would be contravening the motorised vehicle restriction and would be subject to Penalty Charge Notice (PCN). The surplus income generated from PCNs is ringfenced for transport initiatives and the Freedom Pass.

The delivery of the 9 schemes recommended to be taken forward is consistent with the budget approved by the council for 2022/23 financial year.

8.2 The effect of the decision

The making of the ETMOs and the implementation of the schemes and associated monitoring equipment to support them will incur expenditure as set out above, with budget available from the existing operational capital budgets for Parking (CAP39).

8.3 Risks

Revenue from parking charges (including ANPR enforcement) is a key source of income for the council. If the outcome of this report was to not proceed with the recommendation, this would result in a reduction of the projected income from 2022/23 onwards. Also, it is recognised that School Street compliance will change over time, and revenue is continually reducing. However, the schemes remain self-financing and bring important value through their road safety and air quality objectives.

8.4 Options

Substituting the proposed 9 School Street schemes with an elevated physical enforcement presence by Civil Enforcement Officers and using the CCTV smart car to enforce the school zigzags would be more resource demanding and less effective – i.e. is financially less efficient.

Approved by: Alan Layton, Interim Head of Service, on behalf of the Director of Resources & S151 Officer.

9. LEGAL CONSIDERATIONS

9.1 The Head of Litigation and Corporate Law and Deputy Monitoring Officer comments on behalf of the Director of Legal Services and Monitoring Officer as follows.

9.2 The Local Authorities' Traffic (Procedure) (England and Wales) Regulations 1996 (LATOPR 1996) establish the procedures for making a traffic regulation order, (including an Experimental Traffic Regulation Order). The procedural provisions for Experimental Traffic Regulation Orders are set out in regulations 22 and 23 and Schedule 5 to the LATOPR 1996. . Any person may object within the period of 6 months from the date an experimental order comes into force, to an order making the experimental order permanent.

9.3 By virtue of section 122 of the Road Traffic Regulation Act 1984, the Council must exercise its powers under that Act (including making experimental traffic orders under Section 9) so as to secure the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians, and the provision of suitable and adequate parking facilities on and off the highway having regard to:

- The desirability of securing and maintaining reasonable access to premises;
- The effect on the amenities of any locality affected and the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
- The national air quality strategy;
- The importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and
- Any other matters appearing to the local authority to be relevant.

9.4 High Court authority confirms that the Council must have proper regard to the matters set out at s122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision.

9.5 Where ANPR is used, the Council must ensure it adheres to the Surveillance Commissioner Guidance and Information Commissioner Guidance, where appropriate. The council's Parking Enforcement Team has carried out separate Data Protection Impact Assessments (DPIAs) for each camera and site.

(Approved by Mark Turnbull, Interim Corporate Solicitor on behalf of the Director of Legal Services and Monitoring Officer)

10. HUMAN RESOURCES IMPACT

10.1 There are no immediate HR impact issues in this report. If any should arise these will be managed under the Council's Policies and Procedures. Implementation of the recommendations should ensure continued transport investment funding to the Council from TfL/central government.
(Approved by: Dean Shoesmith, Chief People Officer)

11. EQUALITIES IMPACT

11.1 The Equality Act 2010 introduced the Public Sector Equality Duty. This requires all public bodies, including local authorities, to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

11.2 An Equalities Impact Assessment (EqIA) has been completed for the introduction of the new ETMOs for the School Streets, and is included in Appendix D.

11.3 The School Streets operational concept is unchanged since they were first introduced 2017. This project is intended to restrict access for motor traffic

- except resident permit holders, cyclists, emergency services and certain other groups such as carers and those with disabilities. The impact will benefit the more vulnerable – such as pregnant mothers, children, those with debilitating respiratory illnesses with secondary health benefits for the wider communities:
- 11.4 Feedback from the representations received as part of the statutory objection periods on the previous and ongoing ETMOs has not raised any new or emerging equalities issues. The implementing team has considerable practical experience of operating School Streets since 2017 and will bring forward during this experimental phase lessons learned in its operation. The intent being to inform any final decision on continuity.
- 11.5 The EqIA has identified some negative impact in regards to Age, Disability & Pregnancy & Maternity however, the team has in place mitigation to address these including making provision for schools to request temporary access if necessary.
- 11.6 Should the proposed experiment prove successful a full and extensive EqIA review will be carried out based around the project plan as part of any long term changes to the operational methods or in response to any feedback or concern.

(Approved by: Denise McCausland, Equalities Manager)

12. ENVIRONMENTAL IMPACT

- 12.1 The School Street schemes are expected to reduce car use, which in turn will contribute to reducing congestion and air pollution in a wider area. The zone signs are designed to meet the Department for Transport specification and will naturally fit the street scheme. The addition of signs and cameras within the public realm is compensated for by reducing the visual impact of congested traffic and parking.

13. CRIME AND DISORDER REDUCTION IMPACT

- 13.1 Hostile behaviours are presently daily occurrences experienced by driving parents other road users, school staff residents and parking enforcement. This disorderly behaviours can be intimidating and sets a bad example to children. The School Street schemes can significantly reduce and disperse such disorder away from the school entrance where a concentration of children exists.

14. DATA PROTECTION IMPLICATIONS

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

YES

The need for a DPIA has been identified as the project will involve the receiving of statutory objections and representations and using this data

collected during the Objection Period *will* be used to make an informed decision on the future of the schemes

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

YES

Attached copy in Appendix E of this report.

(Approved by: Olawale Adebambo on behalf of the Director of Legal Services and Monitoring Officer)

CONTACT OFFICER: Jayne Rusbatch – Head of Highways and Parking jayne.rusbatch@croydon.gov.uk & Tabrez Hussain – Principal Engineer, Highway Improvements Team

APPENDICES TO THIS REPORT:

1. Appendix A: Design drawings of all proposed 11 Healthy School Streets as consulted upon
2. Appendix B: Consultation leaflets for all proposed 11 Healthy School Street schemes
3. Appendix C: Design drawings of the proposed amendments to 1 out of the 9 schemes recommended to be taken forward for implementation
4. Appendix D: Equalities Impact Assessment
5. Appendix E: Data Protection Impact Assessment (DPIA)
6. Appendix F: Consultation analysis

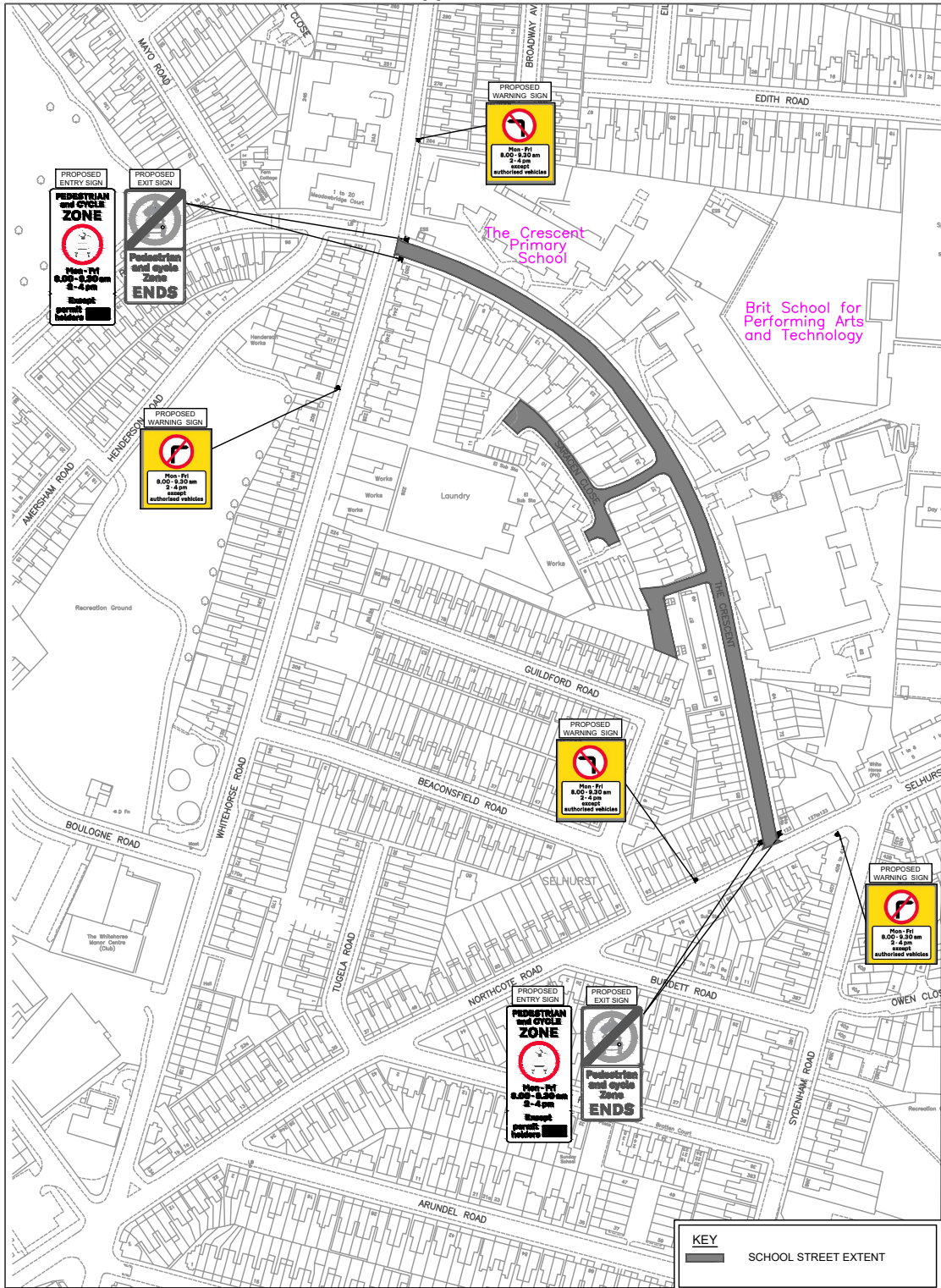
BACKGROUND DOCUMENTS – LOCAL GOVERNMENT ACT 1972

1. <https://www.croydon.gov.uk/transportandstreets/policies>
2. <https://www.gov.uk/government/publications/reallocating-road-space-in-response-to-covid-19-statutory-guidance-for-local-authorities/traffic-management-act-2004-network-management-in-response-to-covid-19>
3. <https://tfl.gov.uk/travel-information/improvements-and-projects/streetspace-for-london>
4. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/716075/vehicle-licensing-statistics-2017-revised.pdf
5. <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/bulletins/birthsummarytablesenglandandwales/20>

17

6. <https://www.sciencedirect.com/science/article/pii/S0048969701007586>
7. <https://www.mumsforlungs.org/resources>
8. <https://democracy.croydon.gov.uk/documents/s17358/Equality%20Analysis%20V3.pdf>
9. Healthy School Streets – Proposed New Experimental Traffic Management Orders at 10 locations; Traffic Management Advisory Committee 21 March 2022
<https://democracy.croydon.gov.uk/documents/s36942/Report%20for%20new%20ETMOs.pdf>.
10. School Streets; Traffic Management Advisory Committee 8 July 2020 [https://democracy.croydon.gov.uk/documents/g2262/Public reports pack 08th-Jul-2020 18.30 Traffic Management Advisory Committee.pdf?T=10](https://democracy.croydon.gov.uk/documents/g2262/Public%20reports%20pack%2008th-Jul-2020%2018.30%20Traffic%20Management%20Advisory%20Committee.pdf?T=10)

Appendix A

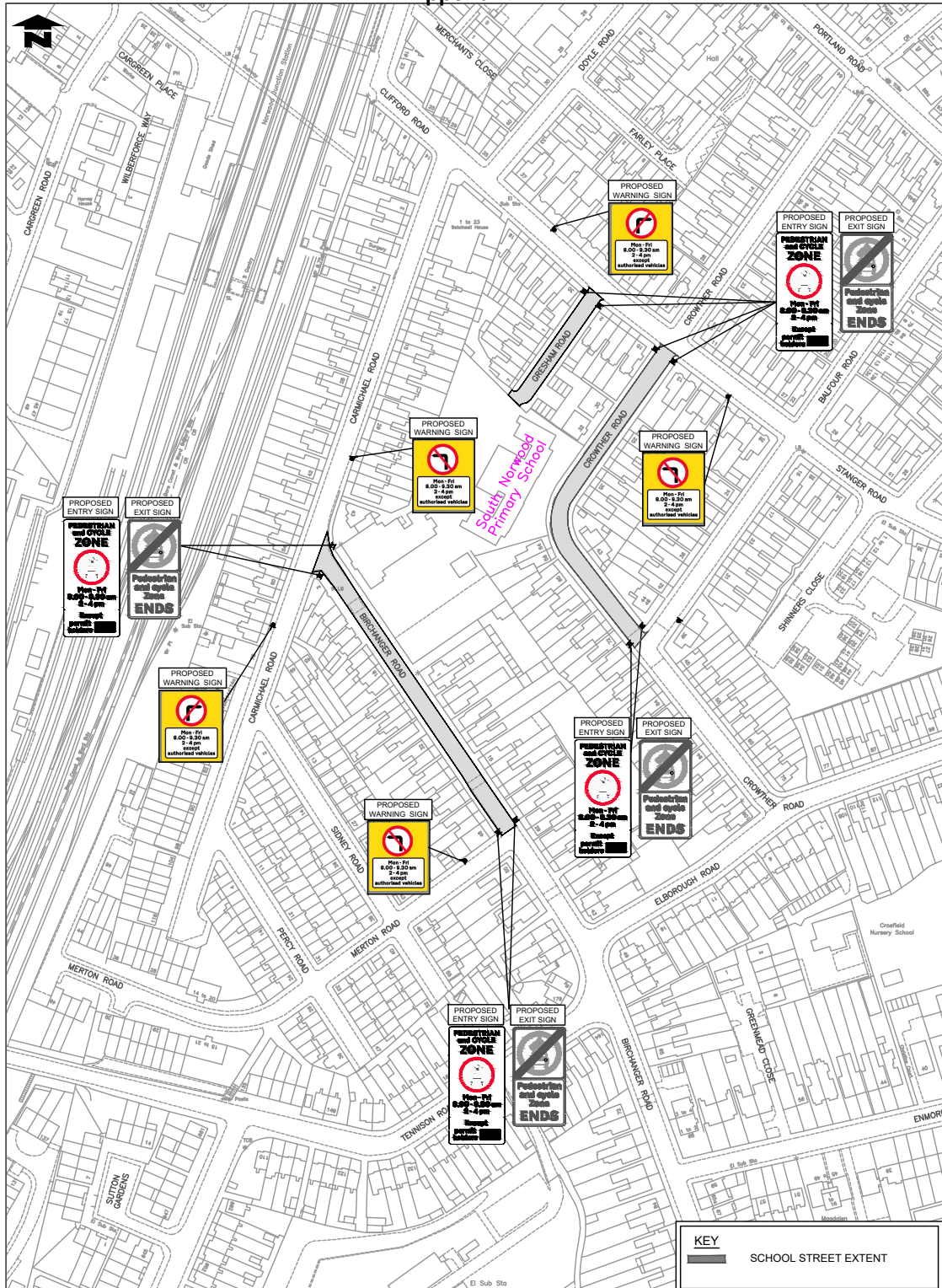


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INFORMAL CONSULTATION
HEALTHY SCHOOL STREET - THE CRESCENT & SARACEN CLOSE (CR0 2HN)

Appendix A



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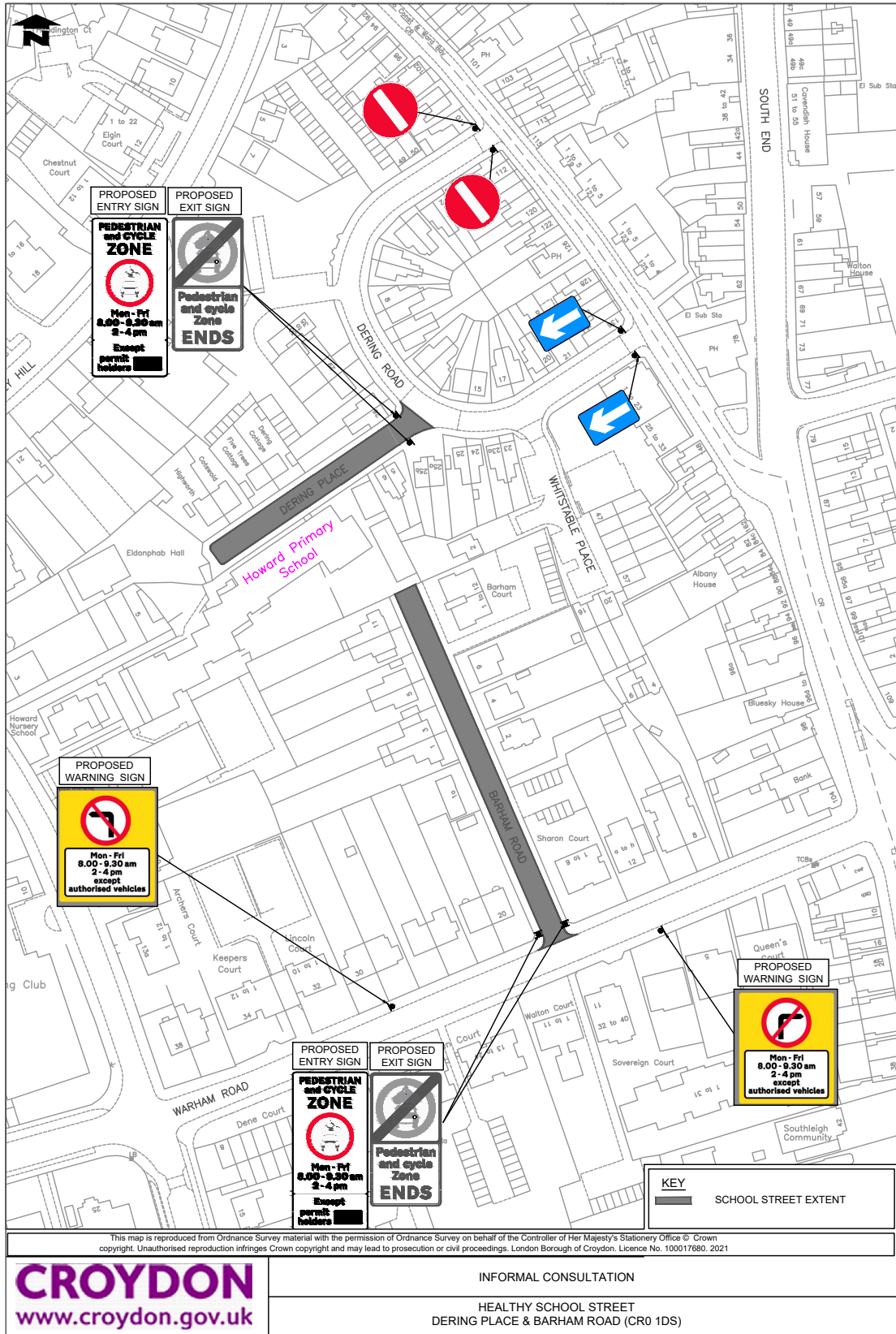
INFORMAL CONSULTATION

HEALTHY SCHOOL STREET
CROWTHER ROAD, GRESHAM ROAD & BIRCHANGER ROAD (SE25 5JU)

Appendix A



Appendix A

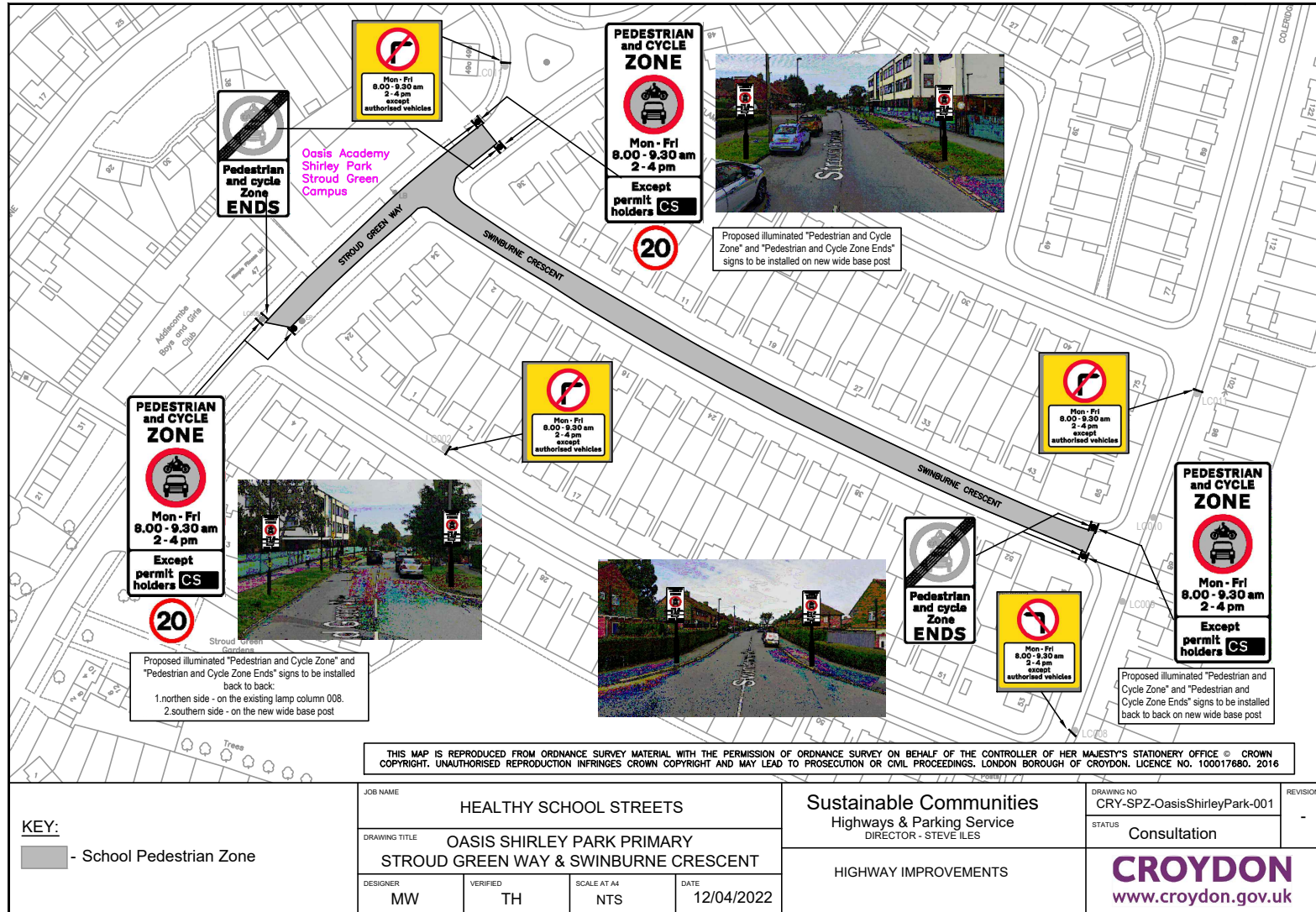


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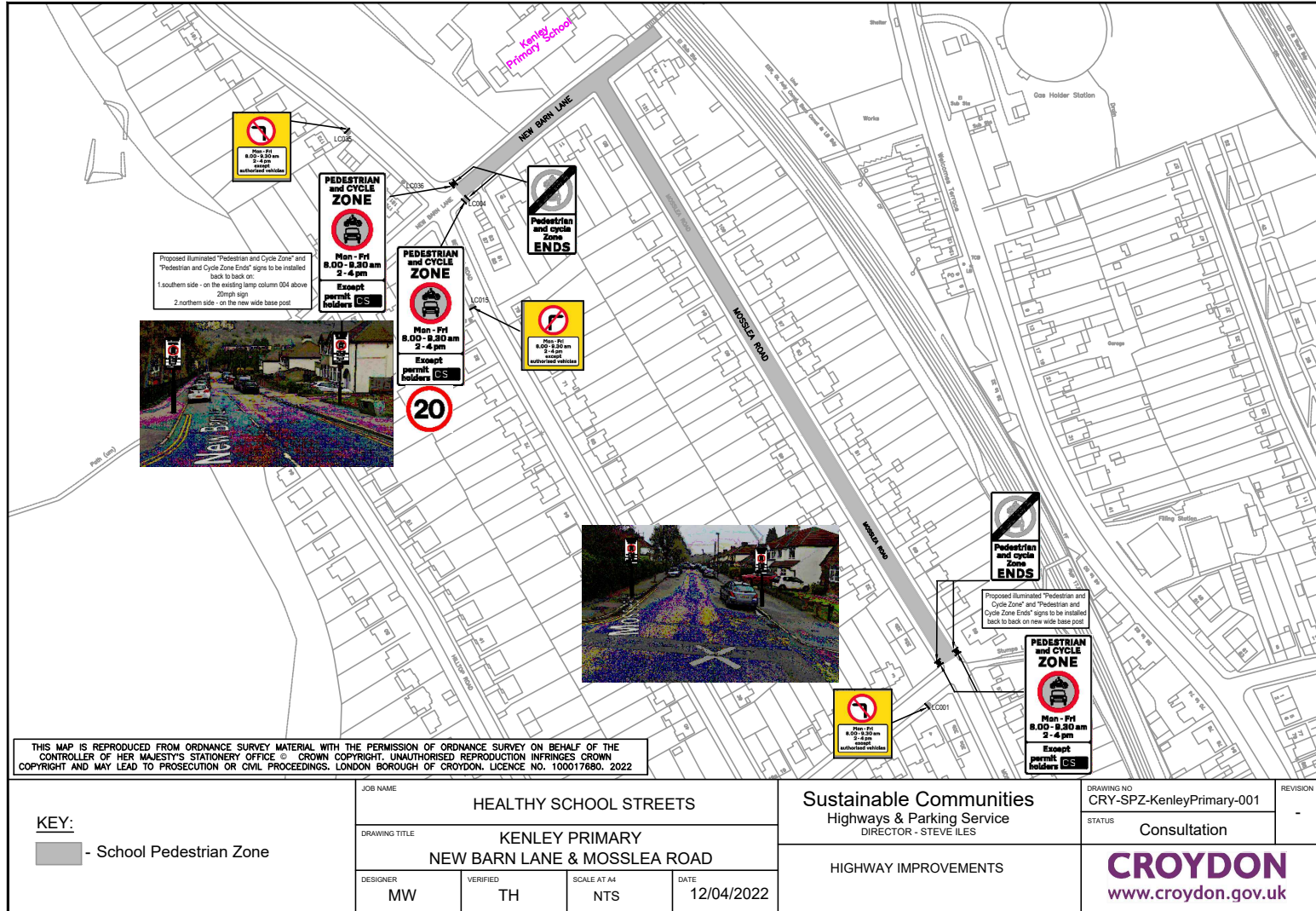
HEALTHY SCHOOL STREET
DERING PLACE & BARHAM ROAD (CR0 1DS)

Appendix A

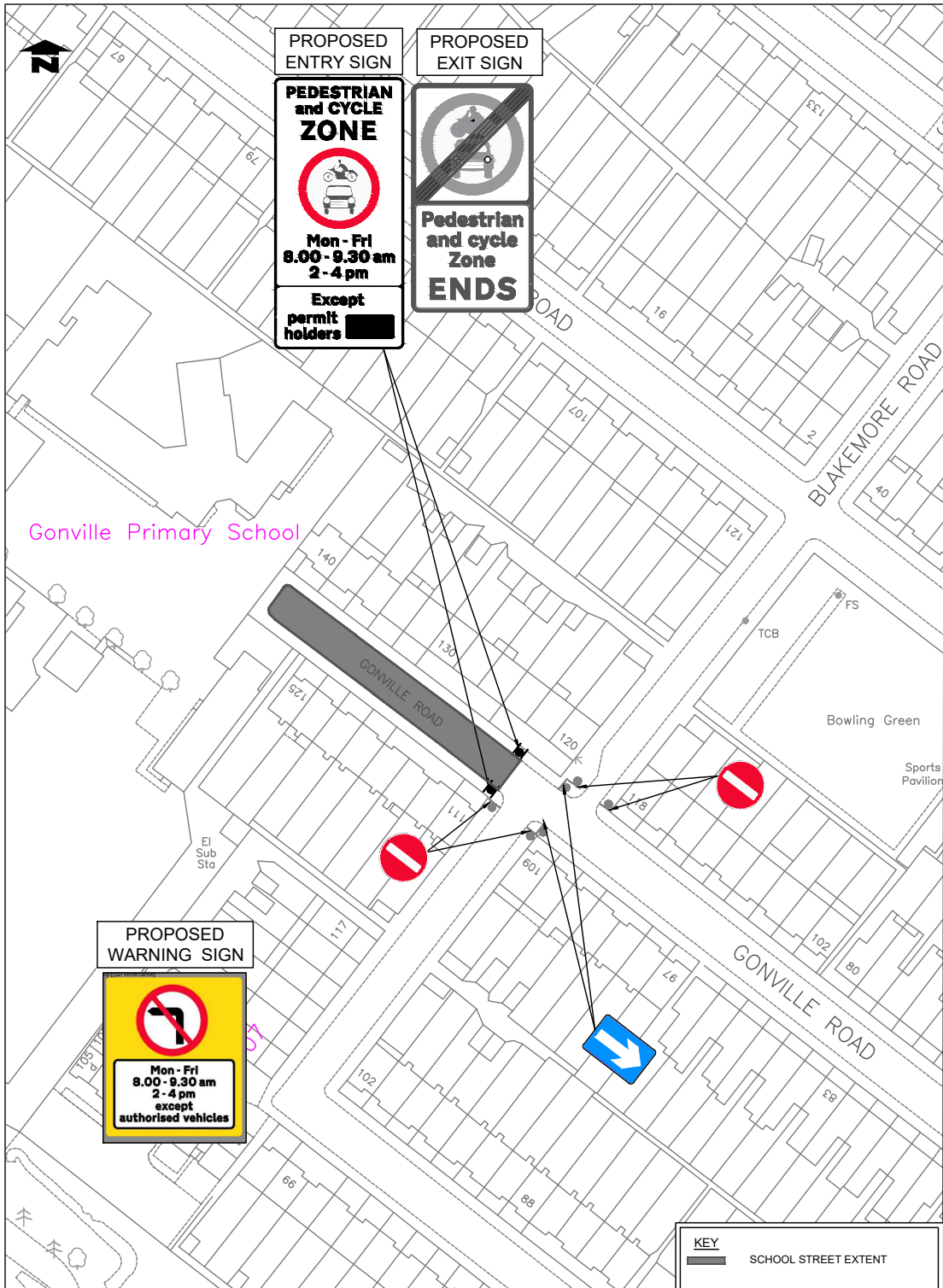


KEY: - School Pedestrian Zone	JOB NAME HEALTHY SCHOOL STREETS		Sustainable Communities Highways & Parking Service DIRECTOR - STEVE ILES		DRAWING NO CRY-SPZ-OasisShirleyPark-001	REVISION -
	DRAWING TITLE OASIS SHIRLEY PARK PRIMARY STROUD GREEN WAY & SWINBURNE CRESCENT		HIGHWAY IMPROVEMENTS		STATUS Consultation	
	DESIGNER MW	VERIFIED TH	SCALE AT A4 NTS	DATE 12/04/2022	CROYDON www.croydon.gov.uk	

Appendix A



Appendix A



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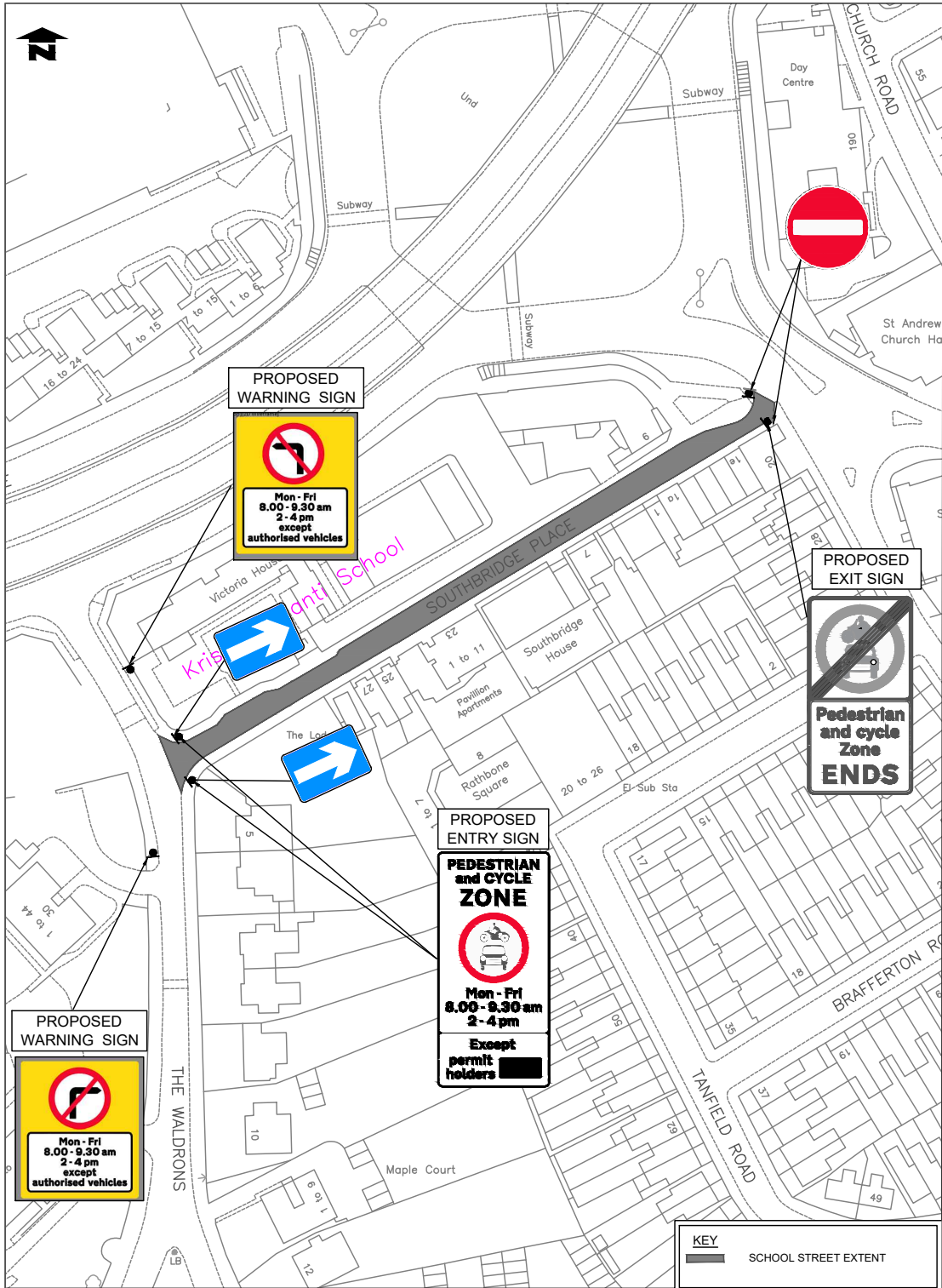
INFORMAL CONSULTATION

HEALTHY SCHOOL STREET
GONVILLE ROAD (CR7 6DL)

Appendix A



Appendix A



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IMPORTANT – PUBLIC CONSULTATION

This is your opportunity to provide your views

The Crescent & Saracen Close Healthy School Street



Croydon Council would like to hear your views on plans to trial a new Healthy School Street scheme on The Crescent & Saracen Close. This leaflet explains more about School Streets, how the scheme would work in your area and how you can respond to our survey.

What are Healthy School Streets?

Healthy School Streets help pupils to have safer, healthier journeys to and from school, by closing the surrounding roads to cars and other motor traffic during school drop-off and pick-up times. **This will not affect residents access – if you live in those roads, you will be able to apply for a permit.**

This encourages parents and pupils to leave the car at home for the school run and instead choose more sustainable and active means of travel to school, such as walking, cycling, or scooting. Healthy School Streets benefit local residents by decreasing non-residential motor traffic in their neighbourhood – reducing congestion, noise, and air pollution.

In Croydon there are already 24 successful Healthy School Streets.

Benefits of Healthy School Streets:

- Safer, cleaner and less polluted streets
- Make it easier to choose sustainable travel like walking and cycling
- Improve our air quality
- Help to tackle the climate crisis and achieve a carbon-neutral Croydon by 2030
- Encourage active travel, helping to promote healthy lifestyles

Why are we proposing to trial one in your street?

The BRIT School, The Crescent, and local residents have reported problems with traffic, congestion, noise, and air pollution during school-run times. The council is seeking to trial several new Healthy School Street schemes in Croydon. The Crescent & Saracen Close are two of 20 streets that have been chosen serving 11 schools in total.

Before we decide whether to introduce the trial scheme, we want to hear your views.

How would the experimental Healthy School Street work?

The Crescent and Saracen Close will become a Pedestrian and Cycle Zone only (except for those eligible for permits) between the hours of 8- 9.30am and 2 - 4pm from Monday to Friday, during school term time only. You can see how this will work in more detail in the plan we have enclosed.

Residents living within the zone – as shown on the plan - will be eligible to apply for a free School Street Exemption permit, so they can have access at all times. In addition, the council will provide permits/exemptions to some road-users who may need access, such as emergency services or refuse vehicles.

- You can find a full list of who is eligible for a permit or exempt from the scheme online at: www.getinvolved.croydon.gov.uk/hss
- For permit/exemption related enquiries only please: schoolstreets@croydon.gov.uk

IMPORTANT – PUBLIC CONSULTATION

This is your opportunity to provide your views

Cumberlow Avenue Healthy School Street



Croydon Council would like to hear your views on plans to trial a new Healthy School Street scheme on Cumberlow Avenue. This leaflet explains more about School Streets, how the scheme would work in your area and how you can respond to our survey.

What are Healthy School Streets?

Healthy School Streets help pupils to have safer, healthier journeys to and from school, by closing the surrounding roads to cars and other motor traffic during school drop-off and pick-up times. **This will not affect residents access – if you live in those roads, you will be able to apply for a permit.**

This encourages parents and pupils to leave the car at home for the school run and instead choose more sustainable and active means of travel to school, such as walking, cycling, or scooting. Healthy School Streets benefit local residents by decreasing non-residential motor traffic in their neighbourhood – reducing congestion, noise, and air pollution.

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- Help to tackle the climate crisis and achieve a carbon-neutral Croydon by 2030
- Encourage active travel, helping to promote healthy lifestyles

Why are we proposing to trial one in your street?

Harris Academy South Norwood, and local residents have reported problems with traffic, congestion, noise, and air pollution during school-run times. The council is seeking to trial several new Healthy School Street schemes in Croydon and Cumberlow Avenue is one of 20 streets that has been chosen.

Before we decide whether to introduce the trial scheme, we want to hear your views.

How would the experimental Healthy School Street work?

Cumberlow Avenue will become a Pedestrian and Cycle Zone only (except for those eligible for permits) between the hours of 8- 9.30am and 2 - 4pm from Monday to Friday, during school term time only. You can see how this will work in more detail in the plan we have enclosed.

Residents living within the zone – as shown on the plan - will be eligible to apply for a free School Street Exemption permit, so they can have access at all times. In addition, the council will provide permits/exemptions to some road-users who may need access, such as emergency services or refuse vehicles.

- You can find a full list of who is eligible for a permit or exempt from the scheme online at: www.getinvolved.croydon.gov.uk/hss
- For permit/exemption related enquiries only please: schoolstreets@croydon.gov.uk

Appendix B

Note: the Healthy School Street permit scheme is separate to any existing Controlled Parking Zone (CPZ) permit scheme in place. If you have a CPZ permit, you will still need to apply for a Healthy Streets Permit.

- Advanced warning signs will be installed on approach and at the junctions informing motorists of the Healthy School Street and times when the road is closed. The scheme will be enforced using Automatic Number Plate Recognition (ANPR) cameras. These will only capture Vehicle Registration Marks (VRMs) of vehicles entering the Healthy School Street during operational hours.
- Vehicles without a valid School Street permit or agreed exemption will not be permitted to enter the Healthy School Street during operational times, however vehicles that are already within the zone will be able to exit. **Note:** not complying with on-street signs may result in a Penalty Charge Notice.

How do I give my views?

You can give your views, quoting scheme reference **CUMBERLOWSS/2022** from **Friday 1 July 2022 – midnight on Thursday 30 July 2022**.

Option 1 – Online: complete our survey at: www.getinvolved.croydon.gov.uk/hss

Option 2 – Post: send your response quoting scheme reference **CUMBERLOWSS/2022** to Highway Improvements Team, Bernard Weatherill House, 8 Mint Walk, CR0 1EA, to arrive by **30 July 2022**. Please provide your full postal address if you would like us to record and consider your views.

Enquiries: for scheme specific queries please email: healthyschoolstreets@croydon.gov.uk including the scheme reference. If you require the materials in another format such as a physical copy/braille or in a larger font size, contact us on 020 8726 6000, 9am- 4pm Monday – Friday or via the email address above.

What happens next?

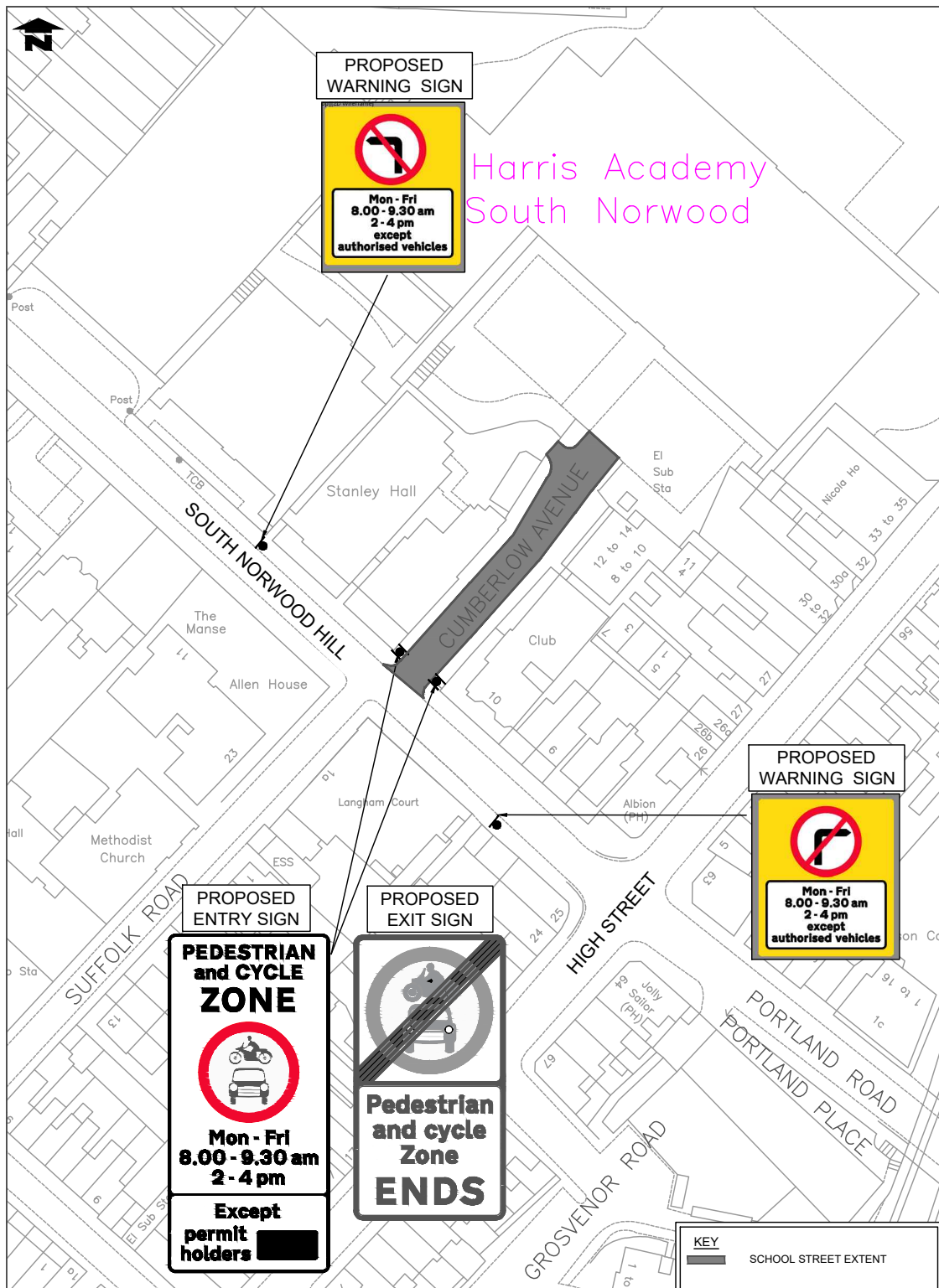
Consultation feedback will be presented as part of a report to the Executive Mayor of Croydon, for him to decide whether the scheme should be introduced on a trial basis. If they agree to go ahead, the public will be informed of the expected start date.

How long does the trial scheme last?

If approved, the Healthy School Street will be implemented as a trial under an Experimental Traffic Management Order (ETMO) for a maximum period of 18 months. The first 6 months is known as the statutory objection period, during which those affected by the trial scheme can submit formal objections. Introducing a scheme under an ETMO allows the council, school and others to experience its true effects, and give them an opportunity to raise any objections.

For further information on Healthy School Streets, ETMO process and permits please visit: www.croydon.gov.uk/school-streets

Appendix B



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IMPORTANT – PUBLIC CONSULTATION

This is your opportunity to provide your views

Birchanger Road, Crowther Road & Gresham Road Healthy School Street



Croydon Council would like to hear your views on plans to trial a new Healthy School Street scheme on Birchanger Road, Crowther Road & Gresham Road. This leaflet explains more about School Streets, how the scheme would work in your area and how you can respond to our survey.

What are Healthy School Streets?

Healthy School Streets help pupils to have safer, healthier journeys to and from school, by closing the surrounding roads to cars and other motor traffic during school drop-off and pick-up times. **This will not affect residents access – if you live in those roads, you will be able to apply for a permit.**

This encourages parents and pupils to leave the car at home for the school run and instead choose more sustainable and active means of travel to school, such as walking, cycling, or scooting. Healthy School Streets benefit local residents by decreasing non-residential motor traffic in their neighbourhood – reducing congestion, noise, and air pollution.

In Croydon there are already 24 successful Healthy School Streets.

Benefits of Healthy School Streets:

- Safer, cleaner and less polluted streets
- Make it easier to choose sustainable travel like walking and cycling
- Improve our air quality
- Help to tackle the climate crisis and achieve a carbon-neutral Croydon by 2030
- Encourage active travel, helping to promote healthy lifestyles

Why are we proposing to trial one in your street?

South Norwood Primary School, and local residents have reported problems with traffic, congestion, noise, and air pollution during school-run times. The council is seeking to trial several new Healthy School Street schemes in Croydon. Birchanger Road, Crowther Road & Gresham Road are three of 20 streets that have been chosen serving 11 schools in total.

Before we decide whether to introduce the trial scheme, we want to hear your views.

How would the experimental Healthy School Street work?

Birchanger Road, Crowther Road & Gresham Road will become a Pedestrian and Cycle Zone only (except for those eligible for permits) between the hours of 8 - 9.30am and 2 - 4pm from Monday to Friday, during school term time only. You can see how this will work in more detail in the plan we have enclosed.

Residents living within the zone – as shown on the plan - will be eligible to apply for a free School Street Exemption permit, so they can have access at all times. In addition, the council will provide permits/exemptions to some road-users who may need access, such as emergency services or refuse vehicles.

- You can find a full list of who is eligible for a permit or exempt from the scheme online at: www.getinvolved.croydon.gov.uk/hss
- For permit/exemption related enquiries only please: schoolstreets@croydon.gov.uk

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Note: the Healthy School Street permit scheme is separate to any existing Controlled Parking Zone (CPZ) permit scheme in place. If you have a CPZ permit, you will still need to apply for a Healthy Streets Permit.

- Advanced warning signs will be installed on approach and at the junctions informing motorists of the Healthy School Street and times when the road is closed. The scheme will be enforced using Automatic Number Plate Recognition (ANPR) cameras. These will only capture Vehicle Registration Marks (VRMs) of vehicles entering the Healthy School Street during operational hours.
- Vehicles without a valid School Street permit or agreed exemption will not be permitted to enter the Healthy School Street during operational times, however vehicles that are already within the zone will be able to exit. **Note:** not complying with on-street signs may result in a Penalty Charge Notice.

How do I give my views?

You can give your views, quoting scheme reference **BIRCHANGERSS/2022** from **Friday 1 July 2022 – midnight on Thursday 30 July 2022**.

Option 1 – Online: complete our survey at: www.getinvolved.croydon.gov.uk/hss

Option 2 – Post: send your response quoting scheme reference **BIRCHANGERSS/2022** to Highway Improvements Team, Bernard Weatherill House, 8 Mint Walk, CR0 1EA, to arrive by **30 July 2022**. Please provide your full postal address if you would like us to record and consider your views.

Enquiries: for scheme specific queries please email: healthyschoolstreets@croydon.gov.uk including the scheme reference. If you require the materials in another format such as a physical copy/braille or in a larger font size, contact us on 020 8726 6000, 9am- 4pm Monday – Friday or via the email address above.

What happens next?

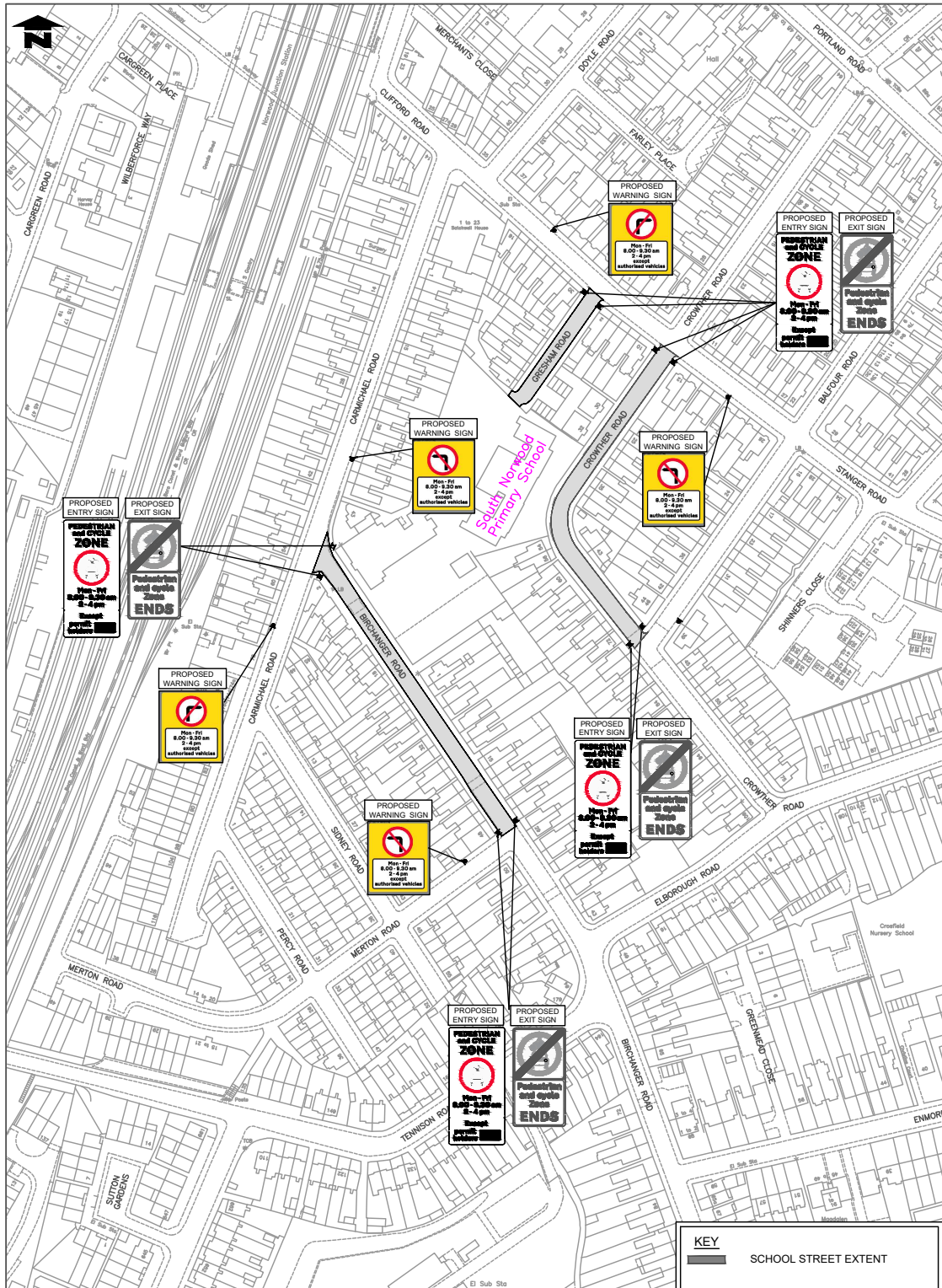
Consultation feedback will be presented as part of a report to the Executive Mayor of Croydon, for him to decide whether the scheme should be introduced on a trial basis. If they agree to go ahead, the public will be informed of the expected start date.

How long does the trial scheme last?

If approved, the Healthy School Street will be implemented as a trial under an Experimental Traffic Management Order (ETMO) for a maximum period of 18 months. The first 6 months is known as the statutory objection period, during which those affected by the trial scheme can submit formal objections. Introducing a scheme under an ETMO allows the council, school and others to experience its true effects, and give them an opportunity to raise any objections.

For further information on Healthy School Streets, ETMO process and permits please visit: www.croydon.gov.uk/school-streets

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INFORMAL CONSULTATION

HEALTHY SCHOOL STREET
CROWTHER ROAD, GRESHAM ROAD & BIRCHANGER ROAD (SE25 5JU)

IMPORTANT – PUBLIC CONSULTATION

This is your opportunity to provide your views

Ingram Road & Springfield Road Healthy School Street



Croydon Council would like to hear your views on plans to trial a new Healthy School Street scheme on Ingram Road & Springfield Road. This leaflet explains more about School Streets, how the scheme would work in your area and how you can respond to our survey.

What are Healthy School Streets?

Healthy School Streets help pupils to have safer, healthier journeys to and from school, by closing the surrounding roads to cars and other motor traffic during school drop-off and pick-up times. **This will not affect residents access – if you live in those roads, you will be able to apply for a permit.**

This encourages parents and pupils to leave the car at home for the school run and instead choose more sustainable and active means of travel to school, such as walking, cycling, or scooting. Healthy School Streets benefit local residents by decreasing non-residential motor traffic in their neighbourhood – reducing congestion, noise, and air pollution.

In Croydon there are already 24 successful Healthy School Streets.

Benefits of Healthy School Streets:

- Safer, cleaner and less polluted streets
- Make it easier to choose sustainable travel like walking and cycling
- Improve our air quality
- Help to tackle the climate crisis and achieve a carbon-neutral Croydon by 2030
- Encourage active travel, helping to promote healthy lifestyles

Why are we proposing to trial one in your street?

St. Cyprians Greek Orthodox Primary School, and local residents have reported problems with traffic, congestion, noise, and air pollution during school-run times. The council is seeking to trial several new Healthy School Street schemes in Croydon. Ingram Road and Springfield Road are two of 20 streets that have been chosen serving 11 schools in total.

Before we decide whether to introduce the trial scheme, we want to hear your views.

How would the experimental Healthy School Street work?

Ingram Road and Springfield Road - from its junction with Carolina Road and Northwood Road - will become a Pedestrian and Cycle Zone only (except for those eligible for permits) between the hours of 8-9.30am and 2 - 4pm from Monday to Friday, during school term time only. You can see how this will work in more detail in the plan we have enclosed.

Residents living within the zone – as shown on the plan - will be eligible to apply for a free School Street Exemption permit, so they can have access at all times. In addition, the council will provide permits/exemptions to some road-users who may need access, such as emergency services or refuse vehicles.

- You can find a full list of who is eligible for a permit or exempt from the scheme online at: www.getinvolved.croydon.gov.uk/hss
- For permit/exemption related enquiries only please: schoolstreets@croydon.gov.uk

Appendix B

Note: the Healthy School Street permit scheme is separate to any existing Controlled Parking Zone (CPZ) permit scheme in place. If you have a CPZ permit, you will still need to apply for a Healthy Streets Permit.

- Advanced warning signs will be installed on approach and at the junctions informing motorists of the Healthy School Street and times when the road is closed. The scheme will be enforced using Automatic Number Plate Recognition (ANPR) cameras. These will only capture Vehicle Registration Marks (VRMs) of vehicles entering the Healthy School Street during operational hours.
- Vehicles without a valid School Street permit or agreed exemption will not be permitted to enter the Healthy School Street during operational times, however vehicles that are already within the zone will be able to exit. **Note:** not complying with on-street signs may result in a Penalty Charge Notice.

How do I give my views?

You can give your views, quoting scheme reference **INGRAMSS/2022** from **Friday 1 July 2022 – midnight on Thursday 30 July 2022**.

Option 1 – Online: complete our survey at: www.getinvolved.croydon.gov.uk/hss

Option 2 – Post: send your response quoting scheme reference **INGRAMSS/2022** to Highway Improvements Team, Bernard Weatherill House, 8 Mint Walk, CR0 1EA, to arrive by **30 July 2022**. Please provide your full postal address if you would like us to record and consider your views.

Enquiries: for scheme specific queries please email: healthyschoolstreets@croydon.gov.uk including the scheme reference. If you require the materials in another format such as a physical copy/braille or in a larger font size, contact us on 020 8726 6000, 9am- 4pm Monday – Friday or via the email address above.

What happens next?

Consultation feedback will be presented as part of a report to the Executive Mayor of Croydon, for him to decide whether the scheme should be introduced on a trial basis. If they agree to go ahead, the public will be informed of the expected start date.

How long does the trial scheme last?

If approved, the Healthy School Street will be implemented as a trial under an Experimental Traffic Management Order (ETMO) for a maximum period of 18 months. The first 6 months is known as the statutory objection period, during which those affected by the trial scheme can submit formal objections. Introducing a scheme under an ETMO allows the council, school and others to experience its true effects, and give them an opportunity to raise any objections.

For further information on Healthy School Streets, ETMO process and permits please visit: www.croydon.gov.uk/school-streets

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IMPORTANT – PUBLIC CONSULTATION

This is your opportunity to provide your views

Dering Place & Barnham Road

Healthy School Street



Croydon Council would like to hear your views on plans to trial a new Healthy School Street scheme on Dering Place & Barnham Road. This leaflet explains more about School Streets, how the scheme would work in your area and how you can respond to our survey.

What are Healthy School Streets?

Healthy School Streets help pupils to have safer, healthier journeys to and from school, by closing the surrounding roads to cars and other motor traffic during school drop-off and pick-up times. **This will not affect residents access – if you live in those roads, you will be able to apply for a permit.**

This encourages parents and pupils to leave the car at home for the school run and instead choose more sustainable and active means of travel to school, such as walking, cycling, or scooting. Healthy School Streets benefit local residents by decreasing non-residential motor traffic in their neighbourhood – reducing congestion, noise, and air pollution.

In Croydon there are already 24 successful Healthy School Streets.

Benefits of Healthy School Streets:

- Safer, cleaner and less polluted streets
- Make it easier to choose sustainable travel like walking and cycling
- Improve our air quality
- Help to tackle the climate crisis and achieve a carbon-neutral Croydon by 2030
- Encourage active travel, helping to promote healthy lifestyles

Why are we proposing to trial one in your street?

Howard Primary School, and local residents have reported problems with traffic, congestion, noise, and air pollution during school-run times. The council is seeking to trial several new Healthy School Street schemes in Croydon. Dering Place & Barnham Road are two of 20 streets that have been chosen serving 11 schools in total.

Before we decide whether to introduce the trial scheme, we want to hear your views.

How would the experimental Healthy School Street work?

Dering Place and Barnham Road will become a Pedestrian and Cycle Zone only (except for those eligible for permits) between the hours of 8- 9.30am and 2 - 4pm from Monday to Friday, during school term time only. You can see how this will work in more detail in the plan we have enclosed.

Residents living within the zone – as shown on the plan - will be eligible to apply for a free School Street Exemption permit, so they can have access at all times. In addition, the council will provide permits/exemptions to some road-users who may need access, such as emergency services or refuse vehicles.

- You can find a full list of who is eligible for a permit or exempt from the scheme online at: www.getinvolved.croydon.gov.uk/hss
- For permit/exemption related enquiries only please: schoolstreets@croydon.gov.uk

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Note: the Healthy School Street permit scheme is separate to any existing Controlled Parking Zone (CPZ) permit scheme in place. If you have a CPZ permit, you will still need to apply for a Healthy Streets Permit.

- Advanced warning signs will be installed on approach and at the junctions informing motorists of the Healthy School Street and times when the road is closed. The scheme will be enforced using Automatic Number Plate Recognition (ANPR) cameras. These will only capture Vehicle Registration Marks (VRMs) of vehicles entering the Healthy School Street during operational hours.
- Vehicles without a valid School Street permit or agreed exemption will not be permitted to enter the Healthy School Street during operational times, however vehicles that are already within the zone will be able to exit. **Note:** not complying with on-street signs may result in a Penalty Charge Notice.

How do I give my views?

You can give your views, quoting scheme reference **DERINGSS/2022** from **Friday 1 July 2022 – midnight on Thursday 30 July 2022**.

Option 1 – Online: complete our survey at: www.getinvolved.croydon.gov.uk/hss

Option 2 – Post: send your response quoting scheme reference **DERINGSS/2022** to Highway Improvements Team, Bernard Weatherill House, 8 Mint Walk, CR0 1EA, to arrive by **30 July 2022**. Please provide your full postal address if you would like us to record and consider your views.

Enquiries: for scheme specific queries please email: healthyschoolstreets@croydon.gov.uk including the scheme reference. If you require the materials in another format such as a physical copy/braille or in a larger font size, contact us on 020 8726 6000, 9am- 4pm Monday – Friday or via the email address above.

What happens next?

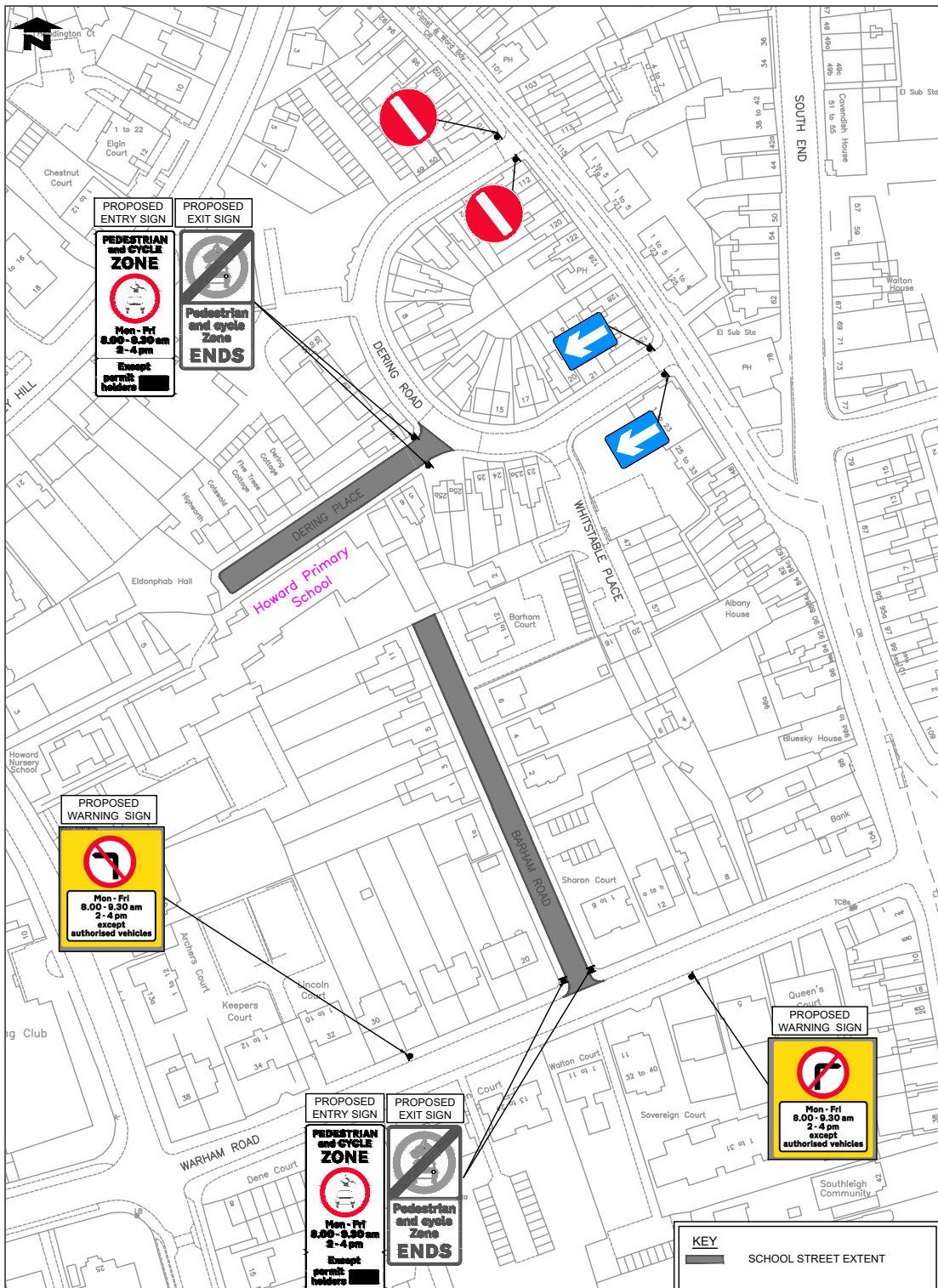
Consultation feedback will be presented as part of a report to the Executive Mayor of Croydon, for him to decide whether the scheme should be introduced on a trial basis. If they agree to go ahead, the public will be informed of the expected start date.

How long does the trial scheme last?

If approved, the Healthy School Street will be implemented as a trial under an Experimental Traffic Management Order (ETMO) for a maximum period of 18 months. The first 6 months is known as the statutory objection period, during which those affected by the trial scheme can submit formal objections. Introducing a scheme under an ETMO allows the council, school and others to experience its true effects, and give them an opportunity to raise any objections.

For further information on Healthy School Streets, ETMO process and permits please visit: www.croydon.gov.uk/school-streets

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INFORMAL CONSULTATION

HEALTHY SCHOOL STREET
DERLING PLACE & BARHAM ROAD (CR0 1DS)

IMPORTANT – PUBLIC CONSULTATION

This is your opportunity to provide your views

Stroud Green Way & Swinburne Crescent Healthy School Street



Croydon Council would like to hear your views on plans to trial a new Healthy School Street scheme on Stroud Green Way & Swinburne Crescent. This leaflet explains more about School Streets, how the scheme would work in your area and how you can respond to our survey.

What are Healthy School Streets?

Healthy School Streets help pupils to have safer, healthier journeys to and from school, by closing the surrounding roads to cars and other motor traffic during school drop-off and pick-up times. **This will not affect residents access – if you live in those roads, you will be able to apply for a permit.**

This encourages parents and pupils to leave the car at home for the school run and instead choose more sustainable and active means of travel to school, such as walking, cycling, or scooting. Healthy School Streets benefit local residents by decreasing non-residential motor traffic in their neighbourhood – reducing congestion, noise, and air pollution.

In Croydon there are already 24 successful Healthy School Streets.

Benefits of Healthy School Streets:

- Safer, cleaner and less polluted streets
- Make it easier to choose sustainable travel like walking and cycling
- Improve our air quality
- Help to tackle the climate crisis and achieve a carbon-neutral Croydon by 2030
- Encourage active travel, helping to promote healthy lifestyles

Why are we proposing to trial one in your street?

Oasis Academy Shirley Park, and local residents have reported problems with traffic, congestion, noise, and air pollution during school-run times. The council is seeking to trial several new Healthy School Street schemes in Croydon. Stroud Green Way and Swinburne Crescent are two of 20 streets that have been chosen serving 11 schools in total.

Before we decide whether to introduce the trial scheme, we want to hear your views.

How would the experimental Healthy School Street work?

Stroud Green Way and Swinburne Crescent - from its junction with Colerdige Road - will become a Pedestrian and Cycle Zone only (except for those eligible for permits) between the hours of 8- 9.30am and 2 - 4pm from Monday to Friday, during school term time only. You can see how this will work in more detail in the plan we have enclosed.

Residents living within the zone – as shown on the plan - will be eligible to apply for a free School Street Exemption permit, so they can have access at all times. In addition, the council will provide permits/exemptions to some road-users who may need access, such as emergency services or refuse vehicles.

- You can find a full list of who is eligible for a permit or exempt from the scheme online at: www.getinvolved.croydon.gov.uk/hss
- For permit/exemption related enquiries only please: schoolstreets@croydon.gov.uk

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Note: the Healthy School Street permit scheme is separate to any existing Controlled Parking Zone (CPZ) permit scheme in place. If you have a CPZ permit, you will still need to apply for a Healthy Streets Permit.

- Advanced warning signs will be installed on approach and at the junctions informing motorists of the Healthy School Street and times when the road is closed. The scheme will be enforced using Automatic Number Plate Recognition (ANPR) cameras. These will only capture Vehicle Registration Marks (VRMs) of vehicles entering the Healthy School Street during operational hours.
- Vehicles without a valid School Street permit or agreed exemption will not be permitted to enter the Healthy School Street during operational times, however vehicles that are already within the zone will be able to exit. **Note:** not complying with on-street signs may result in a Penalty Charge Notice.

How do I give my views?

You can give your views, quoting scheme reference **STROUDSS/2022** from **Friday 1 July 2022 – midnight on Thursday 30 July 2022**.

Option 1 – Online: complete our survey at: www.getinvolved.croydon.gov.uk/hss

Option 2 – Post: send your response quoting scheme reference **STROUDSS/2022** to Highway Improvements Team, Bernard Weatherill House, 8 Mint Walk, CR0 1EA, to arrive by **30 July 2022**. Please provide your full postal address if you would like us to record and consider your views.

Enquiries: for scheme specific queries please email: healthyschoolstreets@croydon.gov.uk including the scheme reference. If you require the materials in another format such as a physical copy/braille or in a larger font size, contact us on 020 8726 6000, 9am- 4pm Monday – Friday or via the email address above.

What happens next?

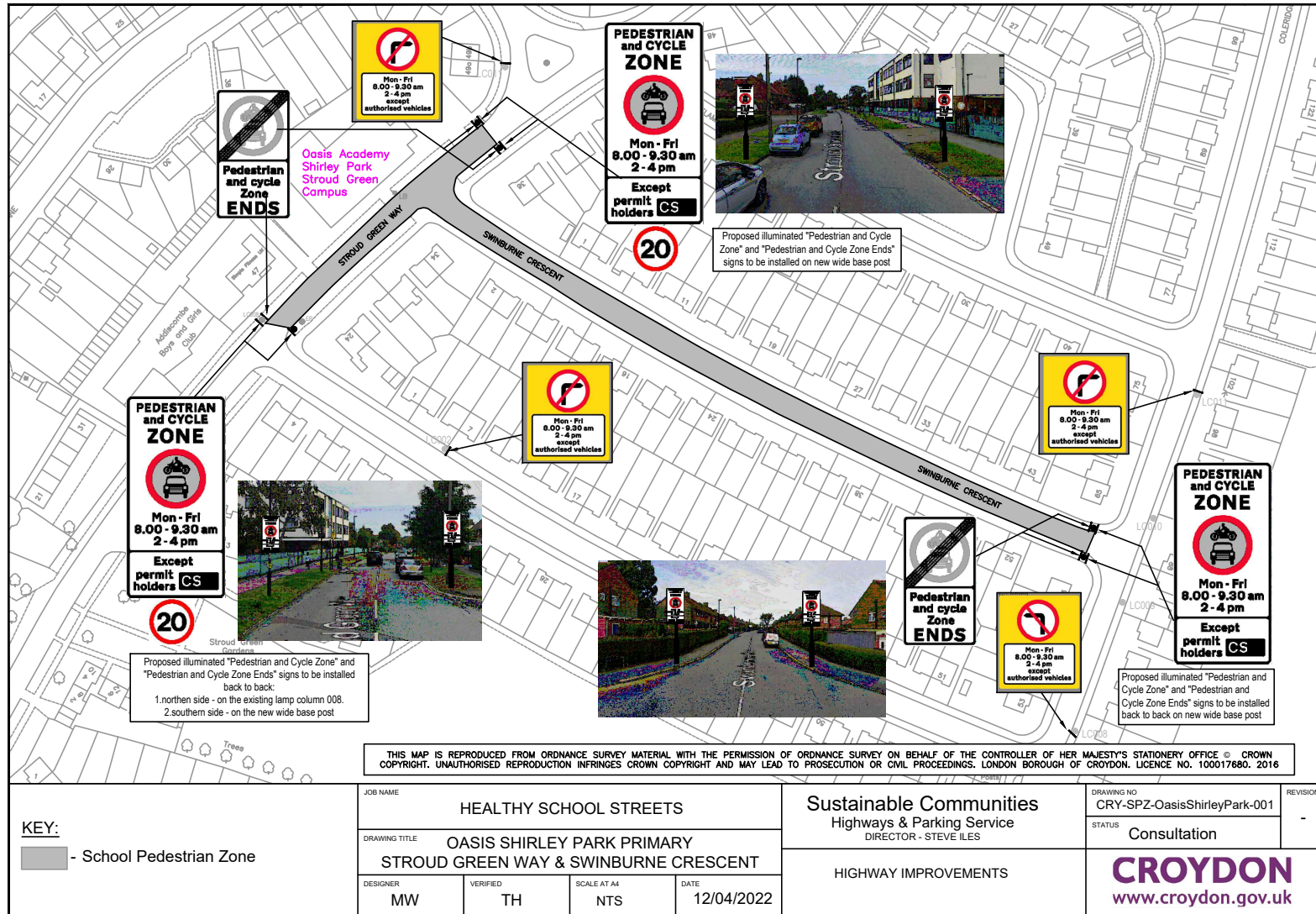
Consultation feedback will be presented as part of a report to the Executive Mayor of Croydon, for him to decide whether the scheme should be introduced on a trial basis. If they agree to go ahead, the public will be informed of the expected start date.

How long does the trial scheme last?

If approved, the Healthy School Street will be implemented as a trial under an Experimental Traffic Management Order (ETMO) for a maximum period of 18 months. The first 6 months is known as the statutory objection period, during which those affected by the trial scheme can submit formal objections. Introducing a scheme under an ETMO allows the council, school and others to experience its true effects, and give them an opportunity to raise any objections.

For further information on Healthy School Streets, ETMO process and permits please visit: www.croydon.gov.uk/school-streets

Appendix B



KEY: - School Pedestrian Zone	JOB NAME HEALTHY SCHOOL STREETS		Sustainable Communities Highways & Parking Service DIRECTOR - STEVE ILES		DRAWING NO CRY-SPZ-OasisShirleyPark-001	REVISION -
	DRAWING TITLE OASIS SHIRLEY PARK PRIMARY STROUD GREEN WAY & SWINBURNE CRESCENT		HIGHWAY IMPROVEMENTS		STATUS Consultation	
	DESIGNER MW	VERIFIED TH	SCALE AT A4 NTS	DATE 12/04/2022	 www.croydon.gov.uk	

IMPORTANT – PUBLIC CONSULTATION

This is your opportunity to provide your views

Dunley Drive & Walker Close Healthy School Street



Croydon Council would like to hear your views on plans to trial a new Healthy School Street scheme on Dunley Drive & Walker Close. This leaflet explains more about School Streets, how the scheme would work in your area and how you can respond to our survey.

What are Healthy School Streets?

Healthy School Streets help pupils to have safer, healthier journeys to and from school, by closing the surrounding roads to cars and other motor traffic during school drop-off and pick-up times. **This will not affect residents access – if you live in those roads, you will be able to apply for a permit.**

This encourages parents and pupils to leave the car at home for the school run and instead choose more sustainable and active means of travel to school, such as walking, cycling, or scooting. Healthy School Streets benefit local residents by decreasing non-residential motor traffic in their neighbourhood – reducing congestion, noise, and air pollution.

In Croydon there are already 24 successful Healthy School Streets.

Benefits of Healthy School Streets:

- Safer, cleaner and less polluted streets
- Make it easier to choose sustainable travel like walking and cycling
- Improve our air quality
- Help to tackle the climate crisis and achieve a carbon-neutral Croydon by 2030
- Encourage active travel, helping to promote healthy lifestyles

Why are we proposing to trial one in your street?

Good Shepherd Catholic Primary & Nursery School, and local residents have reported problems with traffic, congestion, noise, and air pollution during school-run times. The council is seeking to trial several new Healthy School Street schemes in Croydon and Dunley Drive & Walker Close are two of 20 streets that have been chosen serving 11 schools in total.

Before we decide whether to introduce the trial scheme, we want to hear your views.

How would the experimental Healthy School Street work?

Dunley Drive - from its junction with Leigh Cress and Walker Close - will become a Pedestrian and Cycle Zone only (except for those eligible for permits) between the hours of 8- 9.30am and 2 - 4pm from Monday to Friday, during school term time only. You can see how this will work in more detail in the plan we have enclosed.

Residents living within the zone – as shown on the plan - will be eligible to apply for a free School Street Exemption permit, so they can have access at all times. In addition, the council will provide permits/exemptions to some road-users who may need access, such as emergency services or refuse vehicles.

- You can find a full list of who is eligible for a permit or exempt from the scheme online at: www.getinvolved.croydon.gov.uk/hss
- For permit/exemption related enquiries only please: schoolstreets@croydon.gov.uk

Appendix B

Note: the Healthy School Street permit scheme is separate to any existing Controlled Parking Zone (CPZ) permit scheme in place. If you have a CPZ permit, you will still need to apply for a Healthy Streets Permit.

- Advanced warning signs will be installed on approach and at the junctions informing motorists of the Healthy School Street and times when the road is closed. The scheme will be enforced using Automatic Number Plate Recognition (ANPR) cameras. These will only capture Vehicle Registration Marks (VRMs) of vehicles entering the Healthy School Street during operational hours.
- Vehicles without a valid School Street permit or agreed exemption will not be permitted to enter the Healthy School Street during operational times, however vehicles that are already within the zone will be able to exit. **Note:** not complying with on-street signs may result in a Penalty Charge Notice.

How do I give my views?

You can give your views, quoting scheme reference **DUNLEYSS/2022** from **Friday 1 July 2022 – midnight on Thursday 30 July 2022**.

Option 1 – Online: complete our survey at: www.getinvolved.croydon.gov.uk/hss

Option 2 – Post: send your response quoting scheme reference **DUNLEYSS/2022** to Highway Improvements Team, Bernard Weatherill House, 8 Mint Walk, CR0 1EA, to arrive by **30 July 2022**. Please provide your full postal address if you would like us to record and consider your views.

Enquiries: for scheme specific queries please email: healthyschoolstreets@croydon.gov.uk including the scheme reference. If you require the materials in another format such as a physical copy/braille or in a larger font size, contact us on 020 8726 6000, 9am- 4pm Monday – Friday or via the email address above.

What happens next?

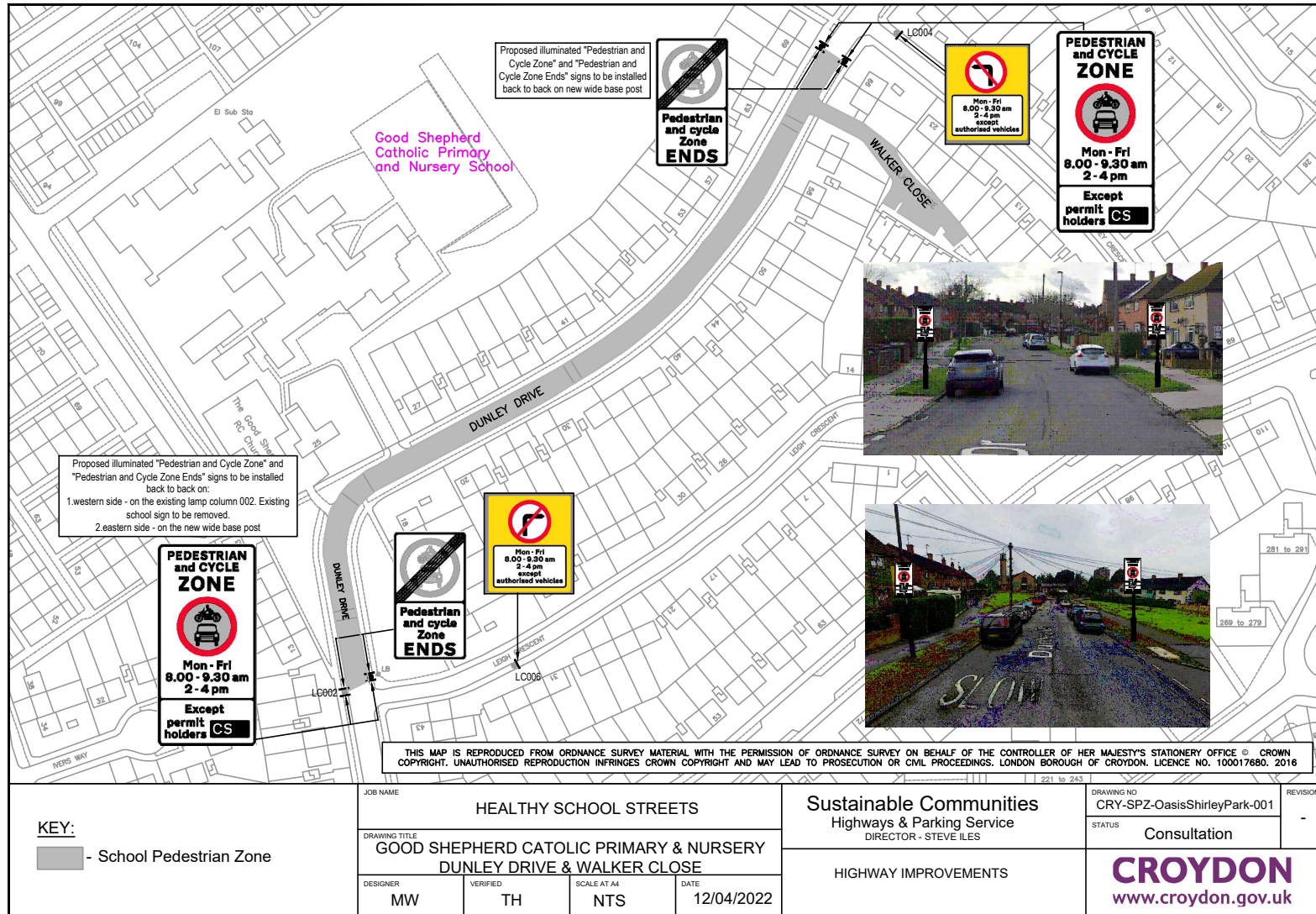
Consultation feedback will be presented as part of a report to the Executive Mayor of Croydon, for him to decide whether the scheme should be introduced on a trial basis. If they agree to go ahead, the public will be informed of the expected start date.

How long does the trial scheme last?

If approved, the Healthy School Street will be implemented as a trial under an Experimental Traffic Management Order (ETMO) for a maximum period of 18 months. The first 6 months is known as the statutory objection period, during which those affected by the trial scheme can submit formal objections. Introducing a scheme under an ETMO allows the council, school and others to experience its true effects, and give them an opportunity to raise any objections.

For further information on Healthy School Streets, ETMO process and permits please visit: www.croydon.gov.uk/school-streets

Appendix B



KEY: - School Pedestrian Zone	JOB NAME HEALTHY SCHOOL STREETS		DRAWING NO CRY-SPZ-OasisShirleyPark-001		REVISION -
	DRAWING TITLE GOOD SHEPHERD CATHOLIC PRIMARY & NURSERY DUNLEY DRIVE & WALKER CLOSE		Sustainable Communities Highways & Parking Service DIRECTOR - STEVE ILES		STATUS Consultation
	DESIGNER MW	VERIFIED TH	SCALE AT A4 NTS	DATE 12/04/2022	HIGHWAY IMPROVEMENTS

IMPORTANT – PUBLIC CONSULTATION

This is your opportunity to provide your views

Mosslea Road & New Barn Lane Healthy School Street



Croydon Council would like to hear your views on plans to trial a new Healthy School Street scheme on Mosslea Road & New Barn Lane. This leaflet explains more about School Streets, how the scheme would work in your area and how you can respond to our survey.

What are Healthy School Streets?

Healthy School Streets help pupils to have safer, healthier journeys to and from school, by closing the surrounding roads to cars and other motor traffic during school drop-off and pick-up times. **This will not affect residents access – if you live in those roads, you will be able to apply for a permit.**

This encourages parents and pupils to leave the car at home for the school run and instead choose more sustainable and active means of travel to school, such as walking, cycling, or scooting. Healthy School Streets benefit local residents by decreasing non-residential motor traffic in their neighbourhood – reducing congestion, noise, and air pollution.

In Croydon there are already 24 successful Healthy School Streets.

Benefits of Healthy School Streets:

- Safer, cleaner and less polluted streets
- Make it easier to choose sustainable travel like walking and cycling
- Improve our air quality
- Help to tackle the climate crisis and achieve a carbon-neutral Croydon by 2030
- Encourage active travel, helping to promote healthy lifestyles

Why are we proposing to trial one in your street?

Kenley Primary School & Kindergarten, and local residents have reported problems with traffic, congestion, noise, and air pollution during school-run times. The council is seeking to trial several new Healthy School Street schemes in Croydon. Mosslea Road & New Barn Lane are two of 20 streets that have been chosen serving 11 schools in total.

Before we decide whether to introduce the trial scheme, we want to hear your views.

How would the experimental Healthy School Street work?

Mosslea Road and New Barn Lane will become a Pedestrian and Cycle Zone only (except for those eligible for permits) between the hours of 8- 9.30am and 2 - 4pm from Monday to Friday, during school term time only. You can see how this will work in more detail in the plan we have enclosed.

Residents living within the zone – as shown on the plan - will be eligible to apply for a free School Street Exemption permit, so they can have access at all times. In addition, the council will provide permits/exemptions to some road-users who may need access, such as emergency services or refuse vehicles.

- You can find a full list of who is eligible for a permit or exempt from the scheme online at: www.getinvolved.croydon.gov.uk/hss
- For permit/exemption related enquiries only please: schoolstreets@croydon.gov.uk

Appendix B

Note: the Healthy School Street permit scheme is separate to any existing Controlled Parking Zone (CPZ) permit scheme in place. If you have a CPZ permit, you will still need to apply for a Healthy Streets Permit.

- Advanced warning signs will be installed on approach and at the junctions informing motorists of the Healthy School Street and times when the road is closed. The scheme will be enforced using Automatic Number Plate Recognition (ANPR) cameras. These will only capture Vehicle Registration Marks (VRMs) of vehicles entering the Healthy School Street during operational hours.
- Vehicles without a valid School Street permit or agreed exemption will not be permitted to enter the Healthy School Street during operational times, however vehicles that are already within the zone will be able to exit. **Note:** not complying with on-street signs may result in a Penalty Charge Notice.

How do I give my views?

You can give your views, quoting scheme reference **MOSSLEASS/2022** from **Friday 1 July 2022 – midnight on Thursday 30 July 2022**.

Option 1 – Online: complete our survey at: www.getinvolved.croydon.gov.uk/hss

Option 2 – Post: send your response quoting scheme reference **MOSSLEASS/2022** to Highway Improvements Team, Bernard Weatherill House, 8 Mint Walk, CR0 1EA, to arrive by **30 July 2022**. Please provide your full postal address if you would like us to record and consider your views.

Enquiries: for scheme specific queries please email: healthyschoolstreets@croydon.gov.uk including the scheme reference. If you require the materials in another format such as a physical copy/braille or in a larger font size, contact us on 020 8726 6000, 9am- 4pm Monday – Friday or via the email address above.

What happens next?

Consultation feedback will be presented as part of a report to the Executive Mayor of Croydon, for him to decide whether the scheme should be introduced on a trial basis. If they agree to go ahead, the public will be informed of the expected start date.

How long does the trial scheme last?

If approved, the Healthy School Street will be implemented as a trial under an Experimental Traffic Management Order (ETMO) for a maximum period of 18 months. The first 6 months is known as the statutory objection period, during which those affected by the trial scheme can submit formal objections. Introducing a scheme under an ETMO allows the council, school and others to experience its true effects, and give them an opportunity to raise any objections.

For further information on Healthy School Streets, ETMO process and permits please visit: www.croydon.gov.uk/school-streets

IMPORTANT – PUBLIC CONSULTATION

This is your opportunity to provide your views

Gonville Road Healthy School Street



Croydon Council would like to hear your views on plans to trial a new Healthy School Street scheme on Gonville Road. This leaflet explains more about School Streets, how the scheme would work in your area and how you can respond to our survey.

What are Healthy School Streets?

Healthy School Streets help pupils to have safer, healthier journeys to and from school, by closing the surrounding roads to cars and other motor traffic during school drop-off and pick-up times. **This will not affect residents access – if you live in those roads, you will be able to apply for a permit.**

This encourages parents and pupils to leave the car at home for the school run and instead choose more sustainable and active means of travel to school, such as walking, cycling, or scooting. Healthy School Streets benefit local residents by decreasing non-residential motor traffic in their neighbourhood – reducing congestion, noise, and air pollution.

In Croydon there are already 24 successful Healthy School Streets.

Benefits of Healthy School Streets:

- Safer, cleaner and less polluted streets
- Make it easier to choose sustainable travel like walking and cycling
- Improve our air quality
- Help to tackle the climate crisis and achieve a carbon-neutral Croydon by 2030
- Encourage active travel, helping to promote healthy lifestyles

Why are we proposing to trial one in your street?

Gonville Academy, and local residents have reported problems with traffic, congestion, noise, and air pollution during school-run times. The council is seeking to trial several new Healthy School Street schemes in Croydon and Gonville Road is one of 20 streets that has been chosen.

Before we decide whether to introduce the trial scheme, we want to hear your views.

How would the experimental Healthy School Street work?

Gonville Road from the school entrance upto its junction with Limpsfield Avenue will become a Pedestrian and Cycle Zone only (except for those eligible for permits) between the hours of 8- 9.30am and 2 - 4pm from Monday to Friday, during school term time only. You can see how this will work in more detail in the plan we have enclosed.

Residents living within the zone – as shown on the plan - will be eligible to apply for a free School Street Exemption permit, so they can have access at all times. In addition, the council will provide permits/exemptions to some road-users who may need access, such as emergency services or refuse vehicles.

- You can find a full list of who is eligible for a permit or exempt from the scheme online at: www.getinvolved.croydon.gov.uk/hss
- For permit/exemption related enquiries only please: schoolstreets@croydon.gov.uk

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Note: the Healthy School Street permit scheme is separate to any existing Controlled Parking Zone (CPZ) permit scheme in place. If you have a CPZ permit, you will still need to apply for a Healthy Streets Permit.

- Advanced warning signs will be installed on approach and at the junctions informing motorists of the Healthy School Street and times when the road is closed. The scheme will be enforced using Automatic Number Plate Recognition (ANPR) cameras. These will only capture Vehicle Registration Marks (VRMs) of vehicles entering the Healthy School Street during operational hours.
- Vehicles without a valid School Street permit or agreed exemption will not be permitted to enter the Healthy School Street during operational times, however vehicles that are already within the zone will be able to exit. **Note:** not complying with on-street signs may result in a Penalty Charge Notice.

How do I give my views?

You can give your views, quoting scheme reference **GONVILLESS/2022** from **Friday 1 July 2022 – midnight on Thursday 30 July 2022**.

Option 1 – Online: complete our survey at: www.getinvolved.croydon.gov.uk/hss

Option 2 – Post: send your response quoting scheme reference **GONVILLESS/2022** to Highway Improvements Team, Bernard Weatherill House, 8 Mint Walk, CR0 1EA, to arrive by **30 July 2022**. Please provide your full postal address if you would like us to record and consider your views.

Enquiries: for scheme specific queries please email: healthyschoolstreets@croydon.gov.uk including the scheme reference. If you require the materials in another format such as a physical copy/braille or in a larger font size, contact us on 020 8726 6000, 9am- 4pm Monday – Friday or via the email address above.

What happens next?

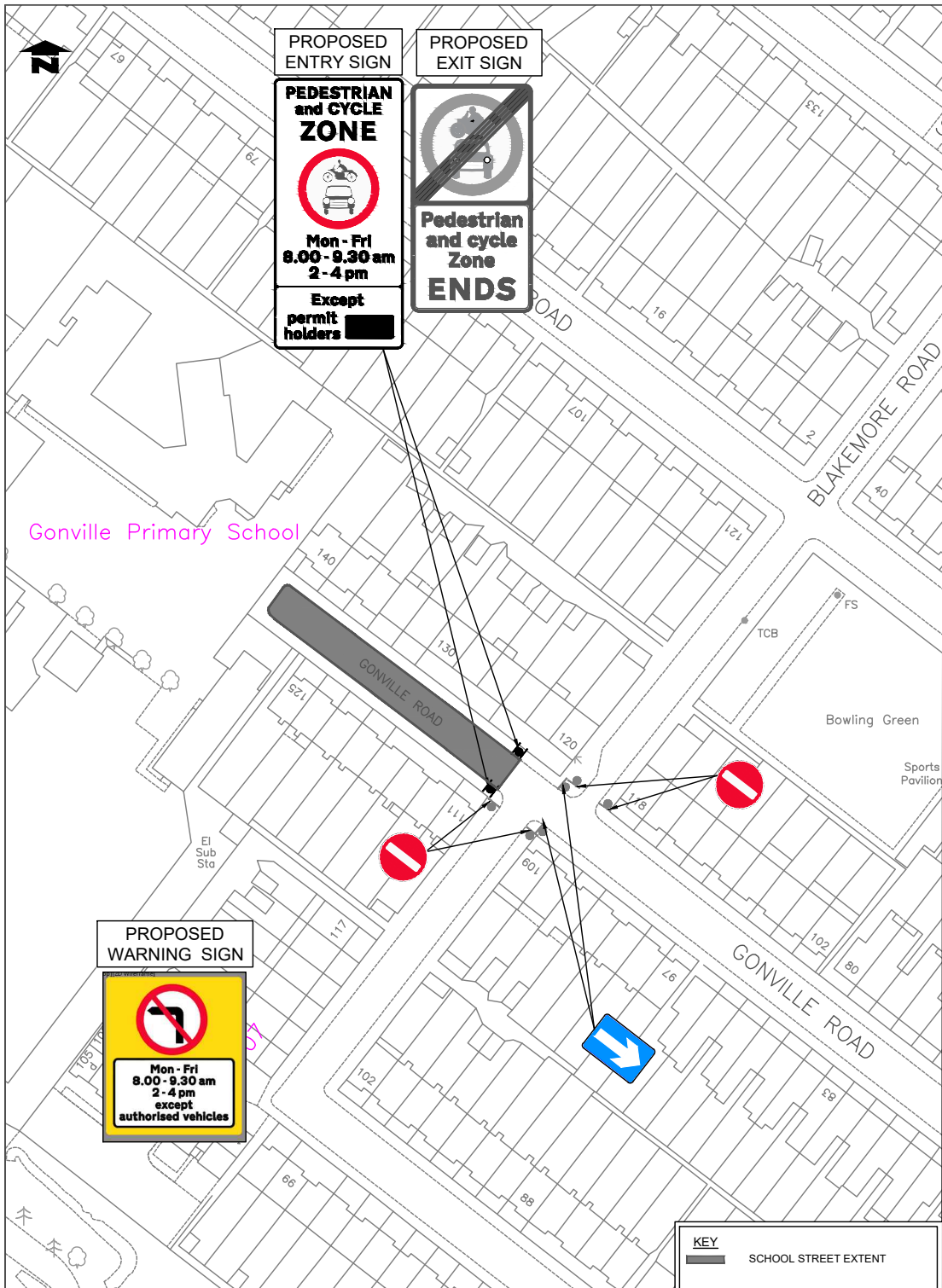
Consultation feedback will be presented as part of a report to the Executive Mayor of Croydon, for him to decide whether the scheme should be introduced on a trial basis. If they agree to go ahead, the public will be informed of the expected start date.

How long does the trial scheme last?

If approved, the Healthy School Street will be implemented as a trial under an Experimental Traffic Management Order (ETMO) for a maximum period of 18 months. The first 6 months is known as the statutory objection period, during which those affected by the trial scheme can submit formal objections. Introducing a scheme under an ETMO allows the council, school and others to experience its true effects, and give them an opportunity to raise any objections.

For further information on Healthy School Streets, ETMO process and permits please visit: www.croydon.gov.uk/school-streets

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CROYDON
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INFORMAL CONSULTATION

HEALTHY SCHOOL STREET
GONVILLE ROAD (CR7 6DL)

IMPORTANT – PUBLIC CONSULTATION

This is your opportunity to provide your views

Stanhope Road & The Avenue

Healthy School Street



Croydon Council would like to hear your views on plans to trial a new Healthy School Street scheme on Stanhope Road and The Avenue. This leaflet explains more about School Streets, how the scheme would work in your area and how you can respond to our survey.

What are Healthy School Streets?

Healthy School Streets help pupils to have safer, healthier journeys to and from school, by closing the surrounding roads to cars and other motor traffic during school drop-off and pick-up times. **This will not affect residents access – if you live in those roads, you will be able to apply for a permit.**

This encourages parents and pupils to leave the car at home for the school run and instead choose more sustainable and active means of travel to school, such as walking, cycling, or scooting. Healthy School Streets benefit local residents by decreasing non-residential motor traffic in their neighbourhood – reducing congestion, noise, and air pollution.

In Croydon there are already 24 successful Healthy School Streets.

Benefits of Healthy School Streets:

- Safer, cleaner and less polluted streets
- Make it easier to choose sustainable travel like walking and cycling
- Improve our air quality
- Help to tackle the climate crisis and achieve a carbon-neutral Croydon by 2030
- Encourage active travel, helping to promote healthy lifestyles

Why are we proposing to trial one in your street?

Park Hill Junior & Infants School, and local residents have reported problems with traffic, congestion, noise, and air pollution during school-run times. The council is seeking to trial several new Healthy School Street schemes in Croydon. Stanhope Road and The Avenue are two of 20 streets that has been chosen.

Before we decide whether to introduce the trial scheme, we want to hear your views.

How would the experimental Healthy School Street work?

Stanhope Road and The Avenue - from its junction with Chichester Road and Cotelands - will become a Pedestrian and Cycle Zone only (except for those eligible for permits) between the hours of 8- 9.30am and 2 - 4pm from Monday to Friday, during school term time only. You can see how this will work in more detail in the plan we have enclosed.

Residents living within the zone – as shown on the plan - will be eligible to apply for a free School Street Exemption permit, so they can have access at all times. In addition, the council will provide permits/exemptions to some road-users who may need access, such as emergency services or refuse vehicles.

- You can find a full list of who is eligible for a permit or exempt from the scheme online at: www.getinvolved.croydon.gov.uk/hss
- For permit/exemption related enquiries only please: schoolstreets@croydon.gov.uk

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Note: the Healthy School Street permit scheme is separate to any existing Controlled Parking Zone (CPZ) permit scheme in place. If you have a CPZ permit, you will still need to apply for a Healthy Streets Permit.

- Advanced warning signs will be installed on approach and at the junctions informing motorists of the Healthy School Street and times when the road is closed. The scheme will be enforced using Automatic Number Plate Recognition (ANPR) cameras. These will only capture Vehicle Registration Marks (VRMs) of vehicles entering the Healthy School Street during operational hours.
- Vehicles without a valid School Street permit or agreed exemption will not be permitted to enter the Healthy School Street during operational times, however vehicles that are already within the zone will be able to exit. **Note:** not complying with on-street signs may result in a Penalty Charge Notice.

How do I give my views?

You can give your views, quoting scheme reference **STANHOPESS/2022** from **Friday 1 July 2022 – midnight on Thursday 30 July 2022**.

Option 1 – Online: complete our survey at: www.getinvolved.croydon.gov.uk/hss

Option 2 – Post: send your response quoting scheme reference **STANHOPESS/2022** to Highway Improvements Team, Bernard Weatherill House, 8 Mint Walk, CR0 1EA, to arrive by **30 July 2022**. Please provide your full postal address if you would like us to record and consider your views.

Enquiries: for scheme specific queries please email: healthyschoolstreets@croydon.gov.uk including the scheme reference. If you require the materials in another format such as a physical copy/braille or in a larger font size, contact us on 020 8726 6000, 9am- 4pm Monday – Friday or via the email address above.

What happens next?

Consultation feedback will be presented as part of a report to the Executive Mayor of Croydon, for him to decide whether the scheme should be introduced on a trial basis. If they agree to go ahead, the public will be informed of the expected start date.

How long does the trial scheme last?

If approved, the Healthy School Street will be implemented as a trial under an Experimental Traffic Management Order (ETMO) for a maximum period of 18 months. The first 6 months is known as the statutory objection period, during which those affected by the trial scheme can submit formal objections. Introducing a scheme under an ETMO allows the council, school and others to experience its true effects, and give them an opportunity to raise any objections.

For further information on Healthy School Streets, ETMO process and permits please visit: www.croydon.gov.uk/school-streets

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July 2022

IMPORTANT – PUBLIC CONSULTATION

This is your opportunity to provide your views

CROYDON  TRANSPORT FOR LONDON
www.croydon.gov.uk

Southbridge Place Healthy School Street



Croydon Council would like to hear your views on plans to trial a new Healthy School Street scheme on Southbridge Place. This leaflet explains more about School Streets, how the scheme would work in your area and how you can respond to our survey.

What are Healthy School Streets?

Healthy School Streets help pupils to have safer, healthier journeys to and from school, by closing the surrounding roads to cars and other motor traffic during school drop-off and pick-up times. **This will not affect residents access – if you live in those roads, you will be able to apply for a permit.**

This encourages parents and pupils to leave the car at home for the school run and instead choose more sustainable and active means of travel to school, such as walking, cycling, or scooting. Healthy School Streets benefit local residents by decreasing non-residential motor traffic in their neighbourhood – reducing congestion, noise, and air pollution.

In Croydon there are already 24 successful Healthy School Streets.

Benefits of Healthy School Streets:

- Safer, cleaner and less polluted streets
- Make it easier to choose sustainable travel like walking and cycling
- Improve our air quality
- Help to tackle the climate crisis and achieve a carbon-neutral Croydon by 2030
- Encourage active travel, helping to promote healthy lifestyles

Why are we proposing to trial one in your street?

Krishna Avanti Primary School, and local residents have reported problems with traffic, congestion, noise, and air pollution during school-run times. The council is seeking to trial several new Healthy School Street schemes in Croydon and Southbridge Place is one of 20 streets that has been chosen.

Before we decide whether to introduce the trial scheme, we want to hear your views.

How would the experimental Healthy School Street work?

Southbridge Place will become a Pedestrian and Cycle Zone only (except for those eligible for permits) between the hours of 8 - 9.30am and 2 - 4pm from Monday to Friday, during school term time only. You can see how this will work in more detail in the plan we have enclosed.

Residents living within the zone – as shown on the plan - will be eligible to apply for a free School Street Exemption permit, so they can have access at all times. In addition, the council will provide permits/exemptions to some road-users who may need access, such as emergency services or refuse vehicles.

- You can find a full list of who is eligible for a permit or exempt from the scheme online at: www.getinvolved.croydon.gov.uk/hss
- For permit/exemption related enquiries only please: schoolstreets@croydon.gov.uk

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Note: the Healthy School Street permit scheme is separate to any existing Controlled Parking Zone (CPZ) permit scheme in place. If you have a CPZ permit, you will still need to apply for a Healthy Streets Permit.

- Advanced warning signs will be installed on approach and at the junctions informing motorists of the Healthy School Street and times when the road is closed. The scheme will be enforced using Automatic Number Plate Recognition (ANPR) cameras. These will only capture Vehicle Registration Marks (VRMs) of vehicles entering the Healthy School Street during operational hours.
- Vehicles without a valid School Street permit or agreed exemption will not be permitted to enter the Healthy School Street during operational times, however vehicles that are already within the zone will be able to exit. **Note:** not complying with on-street signs may result in a Penalty Charge Notice.

How do I give my views?

You can give your views, quoting scheme reference **SOUTHBRIDGESS/2022** from **Friday 1 July 2022 – midnight on Thursday 30 July 2022**.

Option 1 – Online: complete our survey at: www.getinvolved.croydon.gov.uk/hss

Option 2 – Post: send your response quoting scheme reference **SOUTHBRIDGESS/2022** to Highway Improvements Team, Bernard Weatherill House, 8 Mint Walk, CR0 1EA, to arrive by **30 July 2022**. Please provide your full postal address if you would like us to record and consider your views.

Enquiries: for scheme specific queries please email: healthyschoolstreets@croydon.gov.uk including the scheme reference. If you require the materials in another format such as a physical copy/braille or in a larger font size, contact us on 020 8726 6000, 9am- 4pm Monday – Friday or via the email address above.

What happens next?

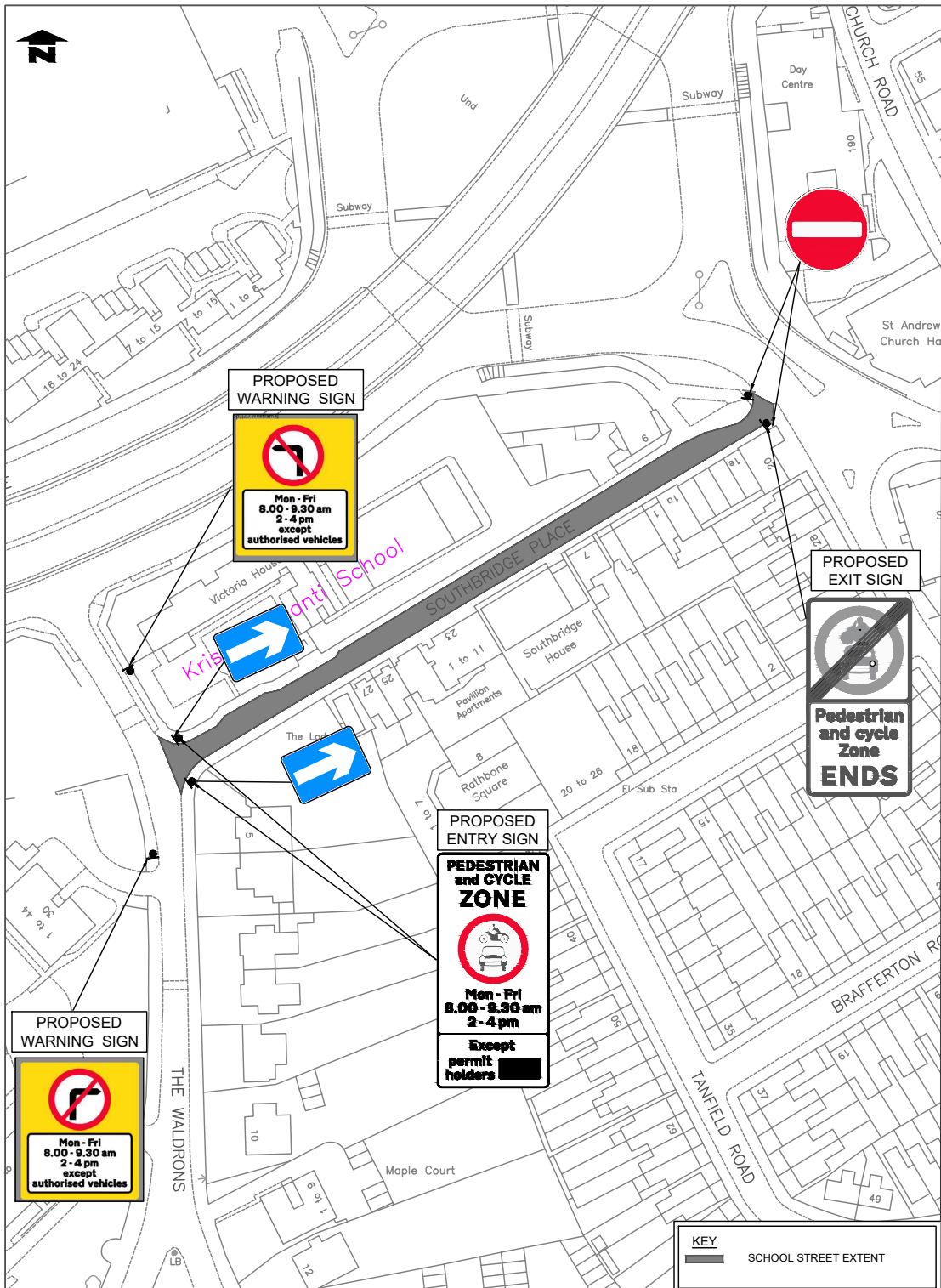
Consultation feedback will be presented as part of a report to the Executive Mayor of Croydon, for him to decide whether the scheme should be introduced on a trial basis. If they agree to go ahead, the public will be informed of the expected start date.

How long does the trial scheme last?


If approved, the Healthy School Street will be implemented as a trial under an Experimental Traffic Management Order (ETMO) for a maximum period of 18 months. The first 6 months is known as the statutory objection period, during which those affected by the trial scheme can submit formal objections. Introducing a scheme under an ETMO allows the council, school and others to experience its true effects, and give them an opportunity to raise any objections.

For further information on Healthy School Streets, ETMO process and permits please visit: www.croydon.gov.uk/school-streets

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 <p>www.croydon.gov.uk</p>	<p>INFORMAL CONSULTATION</p> <p>HEALTHY SCHOOL STREET SOUTHBRIDGE PLACE (CR0 4HA)</p>
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Note: the Healthy School Street permit scheme is separate to any existing Controlled Parking Zone (CPZ) permit scheme in place. If you have a CPZ permit, you will still need to apply for a Healthy Streets Permit.

- Advanced warning signs will be installed on approach and at the junctions informing motorists of the Healthy School Street and times when the road is closed. The scheme will be enforced using Automatic Number Plate Recognition (ANPR) cameras. These will only capture Vehicle Registration Marks (VRMs) of vehicles entering the Healthy School Street during operational hours.
- Vehicles without a valid School Street permit or agreed exemption will not be permitted to enter the Healthy School Street during operational times, however vehicles that are already within the zone will be able to exit. **Note:** not complying with on-street signs may result in a Penalty Charge Notice.

How do I give my views?

You can give your views, quoting scheme reference **CRESCENTSS/2022** from **Friday 1 July 2022 – midnight on Thursday 30 July 2022**.

Option 1 – Online: complete our survey at: www.getinvolved.croydon.gov.uk/hss

Option 2 – Post: send your response quoting scheme reference **CRESCENTSS/2022** to Highway Improvements Team, Bernard Weatherill House, 8 Mint Walk, CRO 1EA, to arrive by **30 July 2022**. Please provide your full postal address if you would like us to record and consider your views.

Enquiries: for scheme specific queries please email: healthyschoolstreets@croydon.gov.uk including the scheme reference. If you require the materials in another format such as a physical copy/braille or in a larger font size, contact us on 020 8726 6000, 9am- 4pm Monday – Friday or via the email address above.

What happens next?

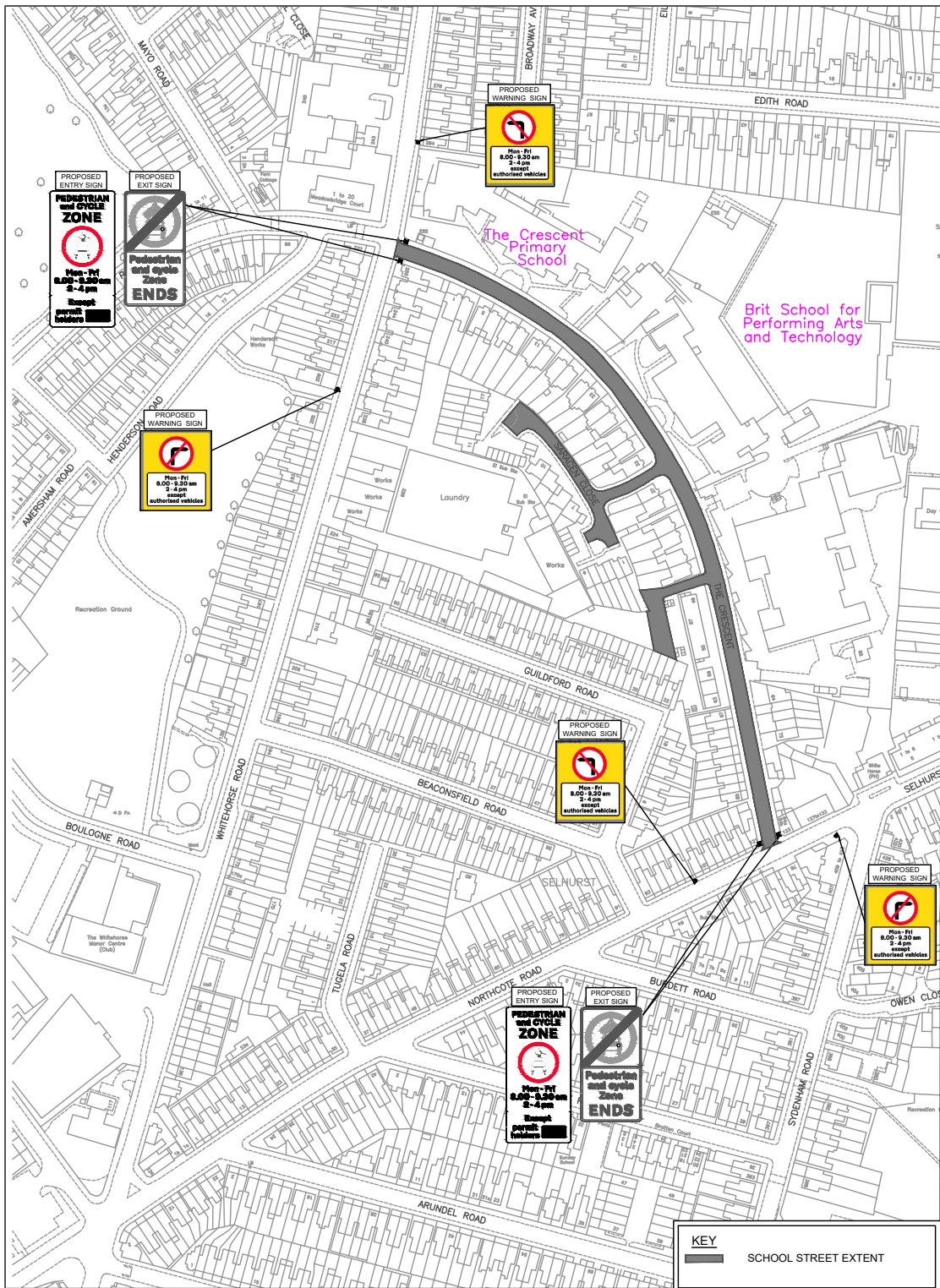
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How long does the trial scheme last?


If approved, the Healthy School Street will be implemented as a trial under an Experimental Traffic Management Order (ETMO) for a maximum period of 18 months. The first 6 months is known as the statutory objection period, during which those affected by the trial scheme can submit formal objections. Introducing a scheme under an ETMO allows the council, school and others to experience its true effects, and give them an opportunity to raise any objections.

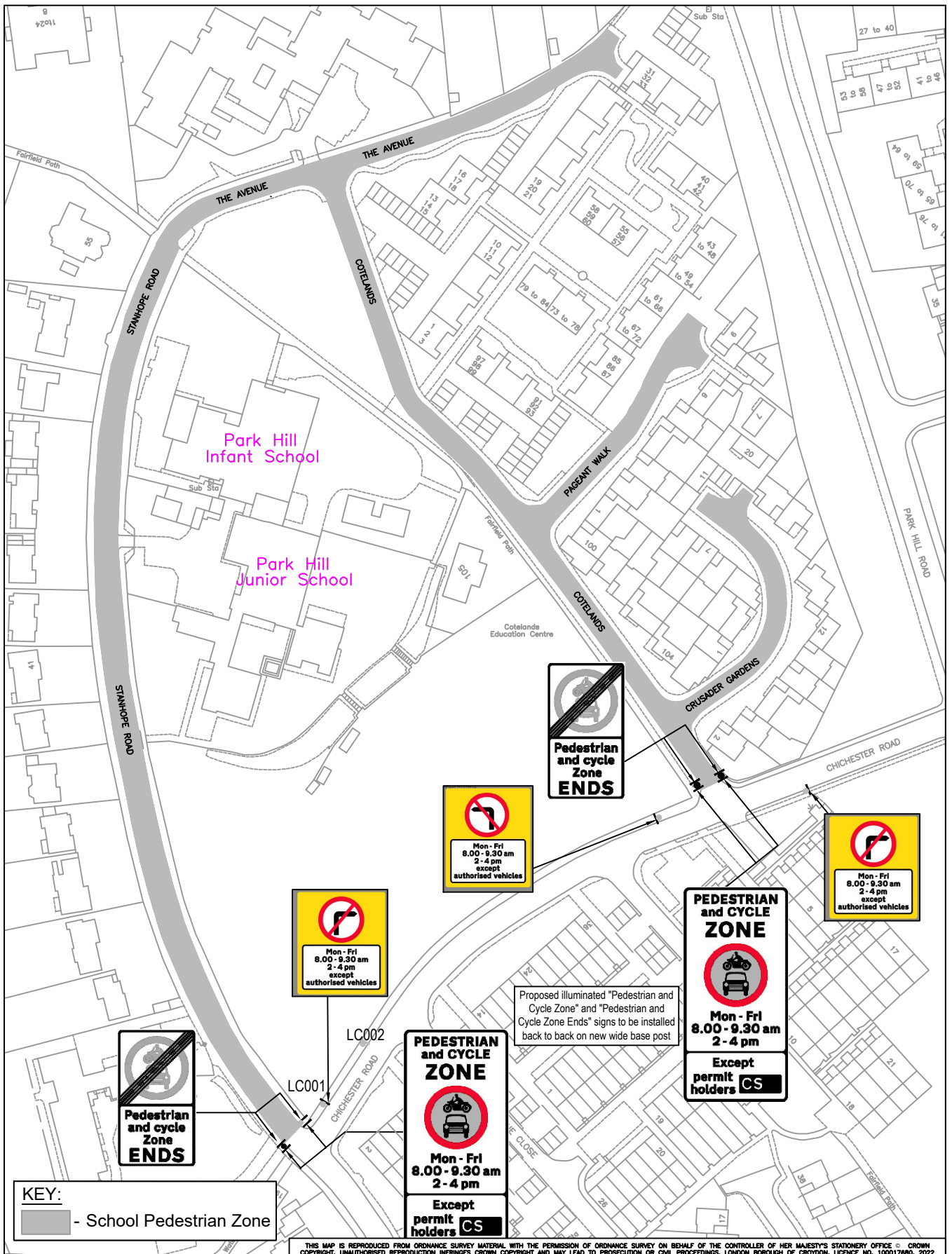
For further information on Healthy School Streets, ETMO process and permits please visit: www.croydon.gov.uk/school-streets

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 <p>CROYDON www.croydon.gov.uk</p>	<p>INFORMAL CONSULTATION</p>
	<p>HEALTHY SCHOOL STREET - THE CRESCENT & SARACEN CLOSE (CR0 2HN)</p>



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JOB NAME HEALTHY SCHOOL STREET		Sustainable Communities Highways & Parking Service DIRECTOR - STEVE ILES		DRAWING NO CRY-SPZ-ParkHillSchool-001	REVISION A
DRAWING TITLE PARK HILL SCHOOLS STANHOPE ROAD & THE AVENUE		HIGHWAY IMPROVEMENTS		STATUS Consultation	
DESIGNER MW	VERIFIED TH	SCALE AT A4 NTS	DATE 28/07/2022	CROYDON www.croydon.gov.uk	

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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	Sustainable Communities, Regeneration & Economic Recovery Directorate
Title of proposed change	Healthy School Streets
Name of Officer carrying out Equality Analysis	Jayne Rusbatch

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

The council's Parking Policy 2019-2022 aims to effectively manage parking provision across the borough in line with the Corporate Plan and the borough's growth objectives. Section 4 of this policy details the School Streets objectives, to ensure we secure a healthy and safe environment near to schools and to help children and parents use cars less and to walk, cycle and use public transport more. The school run presents a particularly harmful combination of air pollution and inactivity for our children and parents.

The Council introduced the first School Streets schemes in 2017 and in April 2022 re-introduced a further 10 Street schemes under Experimental Traffic Management Order (ETMOs), for a period of 18 months. School streets restrict access for motor traffic except resident permit holders, cyclists, emergency services and certain other groups such as carers and those with disabilities.

The Council is now proposing to introduce a further nine School Streets under ETMO, for a period of 18 months. The first 6 months of this 18 month period are known as "statutory objection period" during which anyone affected by the trial scheme has an opportunity to submit objections while the trial is in operation.

Motor traffic is restricted from entering the School Street at pick up and drop off times, reclaiming road space to create pedestrian and cycle zones. The operational hours for each School Street are 08.00 – 9.30 and 2-4pm Monday to Friday term time only. Times are indicated by traffic signs. School Streets aim to create safer and more pleasant environment outside each school, discouraging travel to school by car and promoting walking, cycling and scooting, achieving positive health outcomes for all.

The changes described allow each school and resident community access to the reclaimed space on the road, changing the way the streets are used. It is hoped that this new use of space by the school and community will support active travel.

Reducing traffic from the school gates also helps to tackle air pollution, which is a significant problem for children and pregnant women. Children are particularly vulnerable to the effects of air pollution and, in the context of School Streets, recent studies have indicated that increases in particulate matter PM2.5 can make individuals more susceptible to the effects of COVID-19, increasing the mortality rate. This is therefore a public health priority. Removing congested traffic and idling vehicles from the immediate vicinity of the school entrance, while creating an environment that encourages families to travel to school more actively, may have positive health outcomes for the school community. It is hoped that increased safety and reduced convenience for those driving will encourage more children and parents to walk, cycle and scoot to school.

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. 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

School Streets aim to discourage travel to school by car and promote active travel. This is important as in Croydon, we have a growing issue with obesity in the population, including children. Croydon has the fourth largest proportion of young people in London, with one in four Croydon residents (24.5%) aged between 0-17 years*. It is known that around 1 in 5 children (21.8%) in reception were overweight or living with obesity, and this position worsens in their last year of primary school (Year 6) where around 2 in 5 children (39.5%) were overweight or living with obesity*. School Streets create healthy and safe environment near to schools, to encourage modal shift, which will in turn contribute to addressing the obesity issue.

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The 65 years plus age group makes up 13.9% of the total population in Croydon. In London, this proportion is smaller at 12.2% and in England it is much bigger at 19.6%*. There is likelihood that some of this group may be more reliant on vehicular modes of travel, and consequently would be disadvantaged by the proposals in that they could not drive in the School Streets during the operational hours, but this is more than outweighed by the air pollution benefits. Air pollution is an important public health issue contributing to illness and shortened life expectancy, that disproportionately impacts on the most vulnerable in the population, in particular the sick, young and elderly.

The 2011 Census figures showed that 14.1% of the population in Croydon had their day-to-day activities limited to some extent by a long-term health problem or disability. School Streets will not disproportionately impact on this group as eligible residents are able to apply for exemption permits, to allow them (or their nominated carer) to drive in the School Streets during the operational hours.

* Source: Croydon Observatory www.croydonobservatory.org

+ Source: *Patterns and trends in child obesity in Croydon; A presentation of 2019/20 NCMP data at local authority level, July 2021*

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	<ul style="list-style-type: none"> The school streets schemes treat in general primary school sites, and 	<ul style="list-style-type: none"> For children that may need to be dropped/picked up close to the 	<ul style="list-style-type: none"> Air quality action plan 2017 – 2022.

therefore all age groups will benefit from a safer, quieter and clean street scene during pick up/drop off times.

- The schemes may offer additional space where footways are narrow making areas outside the school gates less congested.
- The elderly population may also benefit from such schemes as equally to the younger age groups this will provide them with a quieter street scene where as an example crossing the road outside the school may make it easier without the need to look out for moving traffic.
- The scheme benefits people of all ages as it encourages travel to and from school in an active forms such as walking and cycling resulting in better health outcomes.
- Public Health (NHS) data shows that Croydon currently have the highest rate of hospital admissions for childhood (0-9 years) asthma in London. 7.5% of premature deaths in Croydon are linked to air pollution. Failing to address NOx and particulate matter emissions in Croydon would deprive many local people of their fundamental right to safe air.
- Public Health data shows one in four Croydon residents (24.5%) aged between 0-17 years. It is known that around 1 in 5 children (21.8%) in reception were overweight or living with obesity, and this position worsens in their last year of primary school (Year 6) where around 2 in 5 children (39.5%) were overweight or living with obesity.

school gates, for reasons such as injuries or disabilities the school street may temporarily be a hindrance. However, the council has made provisions to the schools to request access on their behalf in such circumstances.

- Conversely, older people may be more reliant on travel by motor vehicle and in some cases journey times may increase as a result of the proposal, but the impact is expected to be limited and outweighed by improvements to safety and air quality

Disability	<ul style="list-style-type: none"> Exemptions apply to all residents who have a vehicle registered to an address within a School Street zone. This includes any residents who may have disabilities. Reducing road danger also has the potential to enable more people to participate in active travel who may previously have been discouraged to do so perhaps because of their disability. For example, cycles can improve mobility and access for disabled people, many of whom do not have access to motor vehicles. If individuals do not have a Blue Badge, additional exemptions may be considered in special circumstances on a case by case basis. For example, to allow a SEN Transport bus to collect a child from a residence within a School Street. 	<ul style="list-style-type: none"> There may be individuals who are not aware that they could be eligible for an exemption even in limited special circumstances. Blue Badge holders are eligible for an exemption, as are residents who have registered carers (the carer's vehicle is exempted). As a mitigation measure the council will inform the public of the potential exemptions they may be able to apply for. 	<p>Air quality action plan 2017 – 2022</p> <p>Blue Badge Scheme</p> <p>Croydon Observatory</p> <p>Disabled Parking Accreditation Scheme in association with Disabled Motoring UK.</p>
Sex	<ul style="list-style-type: none"> The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures 		<p>Air quality action plan 2017 – 2022</p>
Gender Identity	<ul style="list-style-type: none"> The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures 		<p>Air quality action plan 2017 – 2022</p>

Marriage or Civil Partnership	<ul style="list-style-type: none"> The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures 		Air quality action plan 2017 – 2022
Religion or belief	<ul style="list-style-type: none"> The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures 		Air quality action plan 2017 – 2022
Race	<ul style="list-style-type: none"> The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures. The proposal is expected to increase participation among under-represented groups in schools that are located in areas of higher deprivation. The schemes may help to create an environment helping to increase the proportion of BAME groups who choose to cycle. 		Air quality action plan 2017 – 2022
Sexual Orientation	<ul style="list-style-type: none"> The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by 		Air quality action plan 2017 – 2022

	implementing parking related measures.		
Pregnancy or Maternity	<ul style="list-style-type: none"> The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures. 	<ul style="list-style-type: none"> Potential negative impact on parents during pregnancy from the driving restrictions. As a mitigation measure the council can issue temporary exemptions on a case by case basis if needed. 	Air quality action plan 2017 – 2022

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
Additional information may come to light during the implementation phase of the schemes and will monitor this.		

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

<p>Column 1</p> <p>PROTECTED GROUP</p>	<p>Column 2</p> <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>Column 3</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>Column 4</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	2	2	4
Disability	2	2	4
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	2	2	4

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 above (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	There may be individuals who are not aware that they could eligible for an exemption even in limited special circumstances.	As a mitigation the council will inform the public of the potential exemptions they may be able to apply for, through communications around the sites at the time of launch and permanently on our website.	Parking	Prior to and at launch of each site Ongoing via the website

Equality Analysis

		Review exemptions criteria to ensure no unanticipated impact on protected characteristic group	Parking	12 months after launch
Race		Identify any further data sources to monitor impact and review EqIA	Parking	3 months after decision
Sex (gender)		Identify any further data sources to monitor impact and review EqIA	Parking	3 months after decision
Gender reassignment				
Sexual orientation				
Age	<p>For children that may need to be dropped/picked up close to the school gates, for reasons such as injuries or disabilities, the School Street may temporarily be a hindrance.</p> <p>Conversely, older people may be more reliant on travel by motor vehicle and in some cases journey times may increase as a result of the proposal.</p>	<p>The council has made provisions for the schools to request access on their behalf in such circumstances.</p> <p>The impact on older people is expected to be limited and outweighed by improvements to safety and air quality.</p>	Parking	Ongoing (process already in place)
Religion or belief				
Pregnancy or maternity	Pregnant parents would be restricted from driving in the School Street.	As a mitigation measure the council can issue temporary exemptions on a case by case basis where needed. The council will inform the public of the potential exemptions they may be able to apply for, through communications around the sites at	Parking	Prior to and at launch of each site Ongoing via the website

		the time of launch and permanently on our website.		
Marriage/civil partnership				

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.</p> <p>Extensive communication with the teachers and families of each school, as well as local -residents and businesses within the affected area, will take place before the trial period begins. Feedback and queries are monitored on an ongoing basis via the dedicated School Streets mailbox for each scheme. Changes in numbers of children travelling to school by car and travelling actively will be monitored by the school through hands up surveys on a termly basis Hands up surveys from each school will also be used as a way of measuring levels of active travel before and after each scheme has been implemented.</p> <p>Each scheme is being implemented on a trial basis. If a scheme receives overwhelmingly negative feedback or is deemed to pose a risk to those using the Pedestrian and Cycle Zone, the trial can be reviewed and stopped at any time.</p>	
Adjust the proposed change	<p>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; The introduction of the School Streets will be under an Experimental Traffic Management Order, and hence this gives the council the ability to adjust the proposals should it be identified during the initial 6 month objection period, that they are having an adverse effect on any of the identified groups.</p>	X

Equality Analysis

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: Cabinet Date: 12 October 2022

7. Sign-Off

Officers that must approve this decision	
Equalities Lead	Name: Barbara Grant on Behalf of Denise McCausland Date: 9th September 2022 Position: Programme Manager (PMO)
Director	Name: Nick Hibberd Date: 12th September 2022 Position: Corporate Director Sustainable Communities, Regeneration & Economic Recovery

Appendix F

This appendix sets out in detail the following items:

- Describes stage 1 of the consultation process (informal consultation) and in further detail stage 2. (The ETMO process)
- Consultation publicity
- Consultation methodology
- Analysis of the responses received per scheme
- Analysis of all 32 themes

Stage 1 - 4-week informal public consultation: the purpose of the 4-week informal consultation exercise was to seek the views of the relevant stakeholders particularly schools on the proposed schemes under ETMOs. This further provides council officers an opportunity to amend the schemes in response to feedback received at the end of the 4-week informal public consultation period to better the schemes before they are recommended for implementation under ETMOs as this report does. The informal public consultation stage has been split into two, the first being consultation with internal stakeholders within the council and the second being an external public consultation. Both methods have been explained in further detail below:

Internal consultation – officers will share the proposals and seek feedback from the following before the consultation is made public:

- The Cabinet Member for Streets & Environment
- Local Ward councillors
- Director of Education
- Highways and Parking Service Teams
- Transport Strategy Service
- Communications & Engagement Team
- Head Teachers of affected schools

External consultation – amendments following feedback at the internal stage will be made and the final public consultation leaflets will be published and shared with the following:

- Local Member's of Parliament
- The Cabinet Member for Streets & Environment
- Local Ward councillors
- Director of Education
- Highways and Parking Service Teams
- Transport Strategy Service
- Communications & Engagement Team
- External partners such as Transport for London, Trams & Buses
- All affected school, the staff and parents
- All affected residents and businesses located within 250m of the school street
- Local groups and associations located within 250m of the school street
- Places of worship located within 250m of the school street
- Emergency Services
- On all council digital platforms

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- Through council press release and newsletter

Consultation method: The council delivered a consultation leaflet per HSS explaining the schemes in detail to all residents, businesses and organisations located within 250metres from the extents of the proposed school street. The consultation leaflets sent out for all 11 proposed Healthy School Street schemes have been included with this report and can be viewed by clicking the relevant links above.

250metre consultation boundary:

To fully understand and appreciate the consultation analysis as presented in this report, it is important to note the consultation boundary, its definition and categorisation.

- 250metre boundary: the council has chosen to consult properties that fall within 250metres of the extents of the proposed healthy school street scheme by sending them a consultation leaflet. This is consistent with the method use previously when consulting on the existing 24 school streets.
- The distance of 250 metres is measured as road length from the various entry points to any one scheme.
- For analysis purposes those properties that fall within 250metres from the extents of the school street proposal that would have received a consultation leaflet are categorised as responses from properties “**Within the area**”. Those responses received from persons beyond the 250metre consultation boundary are categorised as responses from “**Outside the area**”, this could be responses from those live, work, study anywhere in Croydon and beyond it is an undefined area as anyone who feel that they may be impacted by the proposals can respond.

Analysis of responses from those **within** the consultation boundary and those from **outside** is important because depending on how close they live, work or study to the proposals, the impacts you feel or perceive could vary, therefore the feedback given will be different.

For example, those who live, work or study beyond the 250metre consultation boundary may have a greater reliance on the use of a private motor vehicle to pick up and drop off their children to the school and will see the proposal as being restrictive to their movements, whereas those who live within the 250metre boundary may find it easier to walk, cycle or scoot because they are closer, so will be less affected by the proposal.

Furthermore, those within the 250metre boundary are likely to live, work, study closer to the school so may be more appreciative of the issues experienced by residents at school drop off/pick up times.

Consultation publicity:

The consultation launched on 1 July 2022 and expired at midnight on 30 July 2022. It

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was published on all digital platforms in tandem with announcements made about the consultation through a council press release and newsletter. The response rate is based on the number of leaflets delivered to those within the consultation area (250metre boundary) and responses received from the same only. In total 7,491 leaflets were delivered, and 531 responses were received, representing a response rate of 7%, the average response rate from consultations in Croydon is around 10%. In line with good practice the council installed street notices in the vicinity of the school.

The council has an active internal communications and engagement team that made announcements and publications in relation to the consultation via various means these have been detailed below with links to the relevant publications:

- 1) Your Croydon: <https://news.croydon.gov.uk/croydon-proposes-11-new-healthy-school-street-schemes-consultation-launches-today/>
- 2) I Love Croydon Facebook page
- 3) I Love Croydon Instagram page
- 4) I Love Croydon Twitter Account:
<https://mobile.twitter.com/yourcroydon/status/1547651390935166981>
- 5) The council has a dedicated Healthy School Streets website (www.croydon.gov.uk/school-streets), where the consultation material was published along with background information on the councils Healthy School Street programme
- 6) A dedicated Healthy School Streets email was set-up for enquiries only relating to the consultations – healthyschoolstreets@croydon.gov.uk

Stage 2 implementation of schemes under ETMO (statutory consultation): this stage will only apply to those 9 schemes being taken forward for implementation if the recommendation made to the Executive Mayor of Croydon is agreed. The 9 schemes will be implemented under ETMO's for a maximum period of 18months of which the first 6 months is a period of 'statutory consultation' during which anyone affected by the experimental scheme can write in objection.

All the objections received during that 6-month statutory period are considered along with the council's own assessment on how the scheme has performed before taking a decision to either remove the scheme in its entirety or make the scheme permanent after the 18month period. The reasons for implementing schemes under ETMO's are as follows:

- Enables an extended consultation period (6 months)
- Enables those affected to appreciate the true impact of the schemes and submit objections in real time.
- Enables the council to monitor the schemes and its impacts on air pollution and traffic.
- Enables the council to make amendments to the schemes in response to objections received during the first 6 months of the 18-month ETMO period.
- Enables decision makers to review experimental feedback and data before a decision is made to retain or remove schemes.

Analysis of informal public consultation: the council created an online consultation

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survey form for each scheme, published on the council's "Get Involved" website. An opportunity for those that do not have access to the internet or who required the consultation material in another format did exist and where able to submit their response in writing. The benefit of using an online survey platform for response submission was that it made submitting a response easier, convenient for users and allowed officers to monitor and analyse responses received in real time using the tool available on the online platform.

The surveys had the ability to provide the user with an automatic acknowledgement of their response being received along with a link with useful information. Each response has been assigned a consultation ID number generated by the 'Get Involved' online platform, full analysis of the consultation responses received has been appended to this report and key findings of the said consultation have been summarised in the report.

The surveys were designed by colleagues in the council's Communications & Engagement team, based on their knowledge and expertise of similar surveys carried out by the council. The surveys were relatively short and simple and asked the following 6 questions:

- 1) Please provide your address including post code – this question was set as a mandatory response for officers to determine if the person responding falls from within the 250m consultation boundary or outside it, as explained above.
- 2) Please provide your full name
- 3) Please provide your email address – this was requested in the event officers would like to contact the respondent about their response and/or to keep them informed about the outcome of the consultation.
- 4) How strongly do you agree or disagree with the council's proposal to introduce this Healthy School Street? A scale of Strongly Agree, Agree, Strongly Disagree, Disagree and No Opinion. This was used to determine the strength of support or opposition to any given scheme.
- 5) Please explain your answer including any positive or negative impacts you feel the scheme will have on you.
- 6) If you have any other ideas for how we can make the streets outside our schools safer and healthier please tell us below.

Questions 5 & 6 above were used largely to review any suggestions made and formed the basis for officer's assessments on the 9 schemes recommended for implementation, but with proposed amendments to 1 because of the feedback given.

Officers have categorised the responses as follows:

- Within the 250-metre consultation boundary
- Outside the 250-metre consultation boundary
- Merged "Strongly Agree" and "Agree" as responses in support of the proposals
- Merged "Strongly Disagree" and "Disagree" as responses opposed to the proposals
- "No opinion"

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- Analysis of top 4 themes only – this will be the most common feedback given by most respondents.

The responses given have been placed into 32 different themes, analysis of the top 4 theme shows the following:

- Theme 1: the proposal will cause congestion and poor driver behaviour on side roads adjacent to the zone.
Total number of respondents who said the above: 294
Total number of respondents from within the area: 219
Total number of respondents from outside the area: 75
- Theme 2: the proposal will cause access difficulty for working parents, residents, and visitors.
Total number of respondents who said the above: 267
Total number of respondents from within the area: 123
Total number of respondents from outside the area: 144
- Theme 3: the proposal will make it safer to go to school
Total number of respondents who said the above: 172
Total number of respondents from within the area: 103
Total number of respondents from outside the area: 69
- Theme 4: the proposal will require better enforcement of existing restrictions
Total number of respondents who said the above: 114
Total number of respondents from within the area: 66
Total number of respondents from outside the area: 48

Tables 1 -6 below show break down of the results in detail on a scheme-by-scheme basis. The comments received have been categorised into 32 themes as given below.

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HEALTHY SCHOOL STREET	HOW STRONGLY DO YOU AGREE OR DISAGREE WITH THE COUNCILS PROPOSALS TO INTRODUCE THIS HEALTHY SCHOOL STREET?												No. Posted To Consultation Area	No. Returned From Within Consultation Area	%age of Consultation Returned From Within Area				
	AGREE						DISAGREE									No Opinion			
	Strongly Agree		Agree		TOTAL	Within Area	Outside Area	Strongly Disagree		Disagree		TOTAL				Within Area	Outside Area	No.	%
	No.	%	No.	%				No.	%	No.	%								
The Crescent – Crescent Primary School	27	26	15	15	42	25	17	43	42	17	17	60	23	37	1		1306	48	4
Cumberlow Avenue – Harris Academy South Norwood	5	28	1	6	6	3	3	9	50	3	17	12	10	2			884	13	1
Birchanger Road – South Norwood Primary School	23	21	10	9	33	16	17	62	55	17	15	79	56	23			1417	72	5
Springfield Road - St Cyprians Greek Orthodox Primary	19	29	6	8	25	19	6	39	49	15	19	54	46	8			643	65	10
Dering Place - Howard Primary School TBC	22	43	3	6	25	9	16	21	41	5	10	26	14	12			854	23	3
Stroud Green Way, Oasis Shirley Park Primary, Stroud Green	17	41	2	5	19	15	4	15	37	7	17	22	18	4			485	33	7
Dunley Drive, Good Shepherd Catholic Primary & Nursery School	25	35	5	7	30	16	14	34	47	7	10	41	12	29	1	2	450	28	6
New Barn Lane, Kenley Primary	16	18	17	20	33	27	6	40	46	14	16	54	35	19			307	62	20
Gonville Road, Gonville Academy	33	44	13	17	46	31	15	19	25	10	13	29	13	16			429	44	10
Stanhope Road, Park Hill Infant School	44	37	14	12	58	31	27	48	40	12	10	60	38	22	1	1	451	69	15
Krishna Avanti - Southbridge Place	20	15	15	11	35	20	15	91	69	6	5	97	54	43			1119	74	7

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HEALTHY SCHOOL STREET	COMMENTS ANALYSIS												
		Cause congestion in street / side roads (1)		Scheme will not change travel behaviour (2)		Permit area should be increased (3)		Allow CPZ permits to use the School Street (4)		Review your proposals/restrictions on times (5)		Impacts deliveries/traders (6)	
		Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area
The Crescent – Crescent Primary School	AGREE COMMENTS	4	4		1					2	1	1	2
	DISAGREE COMMENTS	10	11	1						2	2	3	1
	TOTAL	29		2		0		0		7		7	
Cumberlow Avenue – Harris Academy South Norwood	AGREE COMMENTS		1										
	DISAGREE COMMENTS	3										1	
	TOTAL	4		0		0		0		0		1	
Birchanger Road – South Norwood Primary School	AGREE COMMENTS	2	1	1									1
	DISAGREE COMMENTS	36	17	3	3	8				2	1	1	2
	TOTAL	56		7		8		0		3		4	
Springfield Road - St Cyprians Greek Orthodox Primary	AGREE COMMENTS	6											
	DISAGREE COMMENTS	33	7	5		1				3	1	5	
	TOTAL	46		5		1		0		4		5	
Dering Place - Howard Primary School TBC	AGREE COMMENTS											2	
	DISAGREE COMMENTS	7	3		1	1		3		4		4	2
	TOTAL	10		1		1		3		4		8	
Stroud Green Way, Oasis Shirley Park Primary, Stroud Green	AGREE COMMENTS	6				1				5		1	
	DISAGREE COMMENTS	7	1	2			1			4	1	3	1
	TOTAL	14		2		2		0		10		5	
Dunley Drive, Good Shepherd Catholic Primary & Nursery School	AGREE COMMENTS	3					1			3			
	DISAGREE COMMENTS	7	5		1	1				1		1	6
	TOTAL	15		1		2		0		4		7	
New Barn Lane, Kenley Primary	AGREE COMMENTS	9	2									1	
	DISAGREE COMMENTS	24	7	7	1					3		6	1
	TOTAL	42		8		0		0		3		8	
Gonville Road, Gonville Academy	AGREE COMMENTS	1								3			
	DISAGREE COMMENTS	6	4	3	1					2	1	1	2
	TOTAL	11		4		0		0		6		3	
Stanhope Road, Park Hill Infant School	AGREE COMMENTS	4	2	2		1		1			1	2	
	DISAGREE COMMENTS	28	1	3		1				1	1	2	
	TOTAL	35		5		2		1		3		4	
Krishna Avanti - Southbridge Place	AGREE COMMENTS	2	3	1		1					2		
	DISAGREE COMMENTS	21	6	1				1		2		21	1
	TOTAL	32		2		1		1		4		22	
		219	75	29	8	15	2	5	0	37	11	55	19
		294		37		17		5		48		74	

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HEALTHY SCHOOL STREET	COMMENTS ANALYSIS												
		Make it safer to go to school (7)		More trees / seating in area (8)		Consider additional traffic calming in area (9)		Provide health benefits (10)		Social/environmental benefits from scheme (11)		Social/environmental disadvantages from scheme (12)	
		Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area
The Crescent – Crescent Primary School	AGREE COMMENTS	10	4	2	3	3		3	1	6	1		
	DISAGREE COMMENTS		2			2	2					1	
	TOTAL	16		5		7		4		7		1	
Cumberlow Avenue – Harris Academy South Norwood	AGREE COMMENTS	2		1						2			
	DISAGREE COMMENTS												
	TOTAL	2		1		0		0		2		0	
Birchanger Road – South Norwood Primary School	AGREE COMMENTS	5	8	2	2	1	1	1	1	3	3		
	DISAGREE COMMENTS			2	1	4	1					1	2
	TOTAL	13		7		7		2		6		3	
Springfield Road - St Cyprians Greek Orthodox Primary	AGREE COMMENTS	10	3					1		4			
	DISAGREE COMMENTS		1			1	1						
	TOTAL	14		0		2		1		4		0	
Dering Place - Howard Primary School TBC	AGREE COMMENTS	5	6	1				2	1	2	2		
	DISAGREE COMMENTS												
	TOTAL	11		1		0		3		4		0	
Stroud Green Way, Oasis Shirley Park Primary, Stroud Green	AGREE COMMENTS	8	2		1			2		1	1		
	DISAGREE COMMENTS	1										1	1
	TOTAL	11		1		0		2		2		2	
Dunley Drive, Good Shepherd Catholic Primary & Nursery School	AGREE COMMENTS	6	8						1	1	1		
	DISAGREE COMMENTS	2					1	1					
	TOTAL	16		0		1		2		2		0	
New Barn Lane, Kenley Primary	AGREE COMMENTS	14	5			2			2	3	1		
	DISAGREE COMMENTS					3	1						
	TOTAL	19		0		6		2		4		0	
Gonville Road, Gonville Academy	AGREE COMMENTS	15	7					3	1	4			
	DISAGREE COMMENTS											1	1
	TOTAL	22		0		0		4		4		2	
Stanhope Road, Park Hill Infant School	AGREE COMMENTS	17	14					4	6	7	7		
	DISAGREE COMMENTS	1		1		2				1		2	
	TOTAL	32		1		2		10		15		2	
Krishna Avanti - Southbridge Place	AGREE COMMENTS	7	9					3	1	4	2		
	DISAGREE COMMENTS					11	16			1		3	
	TOTAL	16		0		27		4		7		3	
		103	69	9	7	29	23	20	14	39	18	9	4
		172		16		52		34		57		13	

Appendix F

HEALTHY SCHOOL STREET	COMMENTS ANALYSIS														
	Review parking practices in area (13)		Extend scheme extent (14)		Make restrictions obvious/clearly marked/more signage (15)		Exemption for disblaed people (16)		Scheme affects EV charging point in restricted road (17)		Scheme will cause additional pollution in side roads (18)		Scheme will provide no additional safety benefits (19)		
	Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area	
The Crescent – Crescent Primary School	AGREE COMMENTS			1		2						1			
	DISAGREE COMMENTS				1	1		1			4	4	1		
	TOTAL		0	2	4	1	0	9	1						
Cumberlow Avenue – Harris Academy South Norwood	AGREE COMMENTS				1										
	DISAGREE COMMENTS			1	2										
	TOTAL		0	1	3	0	0	0	0						
Birchanger Road – South Norwood Primary School	AGREE COMMENTS			1	1	2	1		1		1				
	DISAGREE COMMENTS				1	3	4	1	2	1	10	6	1		
	TOTAL		1	2	10	2	4	17	1						
Springfield Road - St Cyprians Greek Orthodox Primary	AGREE COMMENTS			3							1				
	DISAGREE COMMENTS			1	2						12	3			
	TOTAL		0	4	2	0	0	16	0						
Dering Place - Howard Primary School TBC	AGREE COMMENTS														
	DISAGREE COMMENTS					1					1	1	2		
	TOTAL		0	0	1	0	0	2	2						
Stroud Green Way, Oasis Shirley Park Primary, Stroud Green	AGREE COMMENTS			1									1		
	DISAGREE COMMENTS				1						1				
	TOTAL		0	1	1	0	0	1	1						
Dunley Drive, Good Shepherd Catholic Primary & Nursery School	AGREE COMMENTS			4							1				
	DISAGREE COMMENTS			3							1				
	TOTAL		0	7	0	0	0	2	0						
New Barn Lane, Kenley Primary	AGREE COMMENTS			3	1	2									
	DISAGREE COMMENTS			8	4						5	1			
	TOTAL		0	12	6	0	0	6	0						
Gonville Road, Gonville Academy	AGREE COMMENTS												1		
	DISAGREE COMMENTS			1	1								1		
	TOTAL		0	2	0	0	0	0	0				2		
Stanhope Road, Park Hill Infant School	AGREE COMMENTS			12	4	1			1		2				
	DISAGREE COMMENTS			18	1	2	1		1		7	1			
	TOTAL		0	35	3	0	2	10	0						
Krishna Avanti - Southbridge Place	AGREE COMMENTS				1	2									
	DISAGREE COMMENTS			1	1	4	18				5	1			
	TOTAL		0	2	25	0	0	6	0						
		0	1	58	10	22	33	1	2	5	1	51	18	7	0
		1	68	55	3	6	69	7							

Appendix F

HEALTHY SCHOOL STREET	COMMENTS ANALYSIS														
		Consider 'no entry' / 'one way' etc as an alternative to proposal (20)		Cash Cow (21)		Scheme Unnecessary (22)		Spend the money somewhere else (23)		Scheme creates unsafe surrounding roads (24)		Difficulty for working parents/residents/visitors (25)		Some schools will be less attractive (26)	
		Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area
The Crescent – Crescent Primary School	AGREE COMMENTS	6	6							1		3	1	1	
	DISAGREE COMMENTS	5	10	4	3	4	4			2	4	9	26		
	TOTAL	11	16	4	3	4	4	0	0	3	4	12	27	1	1
Cumberlow Avenue – Harris Academy South Norwood	AGREE COMMENTS					1									
	DISAGREE COMMENTS					4	1					2			
	TOTAL	0	0	0	0	5	1	0	0	0	0	2	0	0	0
Birchanger Road – South Norwood Primary School	AGREE COMMENTS														
	DISAGREE COMMENTS		4	5	8	8		1		7	4	19	9		1
	TOTAL	0	4	5	8	8	0	1	0	7	4	19	9	0	1
Springfield Road - St Cyprians Greek Orthodox Primary	AGREE COMMENTS	3	2			1									
	DISAGREE COMMENTS	1	1	4	3	6		1		4	2	24	5		
	TOTAL	4	3	4	3	7	0	1	0	4	2	24	5	0	0
Dering Place - Howard Primary School TBC	AGREE COMMENTS														
	DISAGREE COMMENTS			3	1		1					2	6		
	TOTAL	0	0	3	1	1	1	0	0	0	0	2	6	0	0
Stroud Green Way, Oasis Shirley Park Primary, Stroud Green	AGREE COMMENTS	1													
	DISAGREE COMMENTS			1	1	4	1	2			1	5	1		
	TOTAL	1	0	1	1	4	1	2	0	0	1	5	1	0	0
Dunley Drive, Good Shepherd Catholic Primary & Nursery School	AGREE COMMENTS	2	1							2			2		
	DISAGREE COMMENTS			1	2	2	7			2	4	7	21		
	TOTAL	2	1	1	2	2	7	0	0	4	4	7	21	0	0
New Barn Lane, Kenley Primary	AGREE COMMENTS		1								1	5	1		
	DISAGREE COMMENTS			4	2	14	3	1		9	3	12	10		
	TOTAL	0	1	4	2	14	3	1	0	9	3	12	10	0	0
Gonville Road, Gonville Academy	AGREE COMMENTS									2		2			
	DISAGREE COMMENTS			1	2	1	3	1		1	1		5		
	TOTAL	0	0	1	2	1	3	1	0	1	1	0	5	0	0
Stanhope Road, Park Hill Infant School	AGREE COMMENTS	1				1				1		3	3		
	DISAGREE COMMENTS	8	6	2	3	3	3			14		12	21	1	
	TOTAL	9	6	2	3	4	3	0	0	15	0	15	24	1	1
Krishna Avanti - Southbridge Place	AGREE COMMENTS		1								3		3		
	DISAGREE COMMENTS		1	2	2	6	1			9	1	18	30		3
	TOTAL	0	2	2	2	6	1	0	0	9	1	18	30	0	3
		27	33	27	27	55	24	6	0	54	24	123	144	2	4
		60	66	54	54	79	24	6	0	78	24	267	144	2	4

Appendix F

HEALTHY SCHOOL STREET	COMMENTS ANALYSIS												
		No IDLING signs (27)		Impacts Surrounding Schools (28)		Better enforcement of existing restrictions (29)		Waste of Money (30)		Loss of income due to inaccessible driveway by visitors (31)		Parking Problems (32)	
		Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area	Within Area	Outside Area
The Crescent – Crescent Primary School	AGREE COMMENTS					1	2						
	DISAGREE COMMENTS					4	7						
	TOTAL	0	0	0	0	14	0	0	0	0	0	0	0
Cumberlow Avenue – Harris Academy South Norwood	AGREE COMMENTS						1						
	DISAGREE COMMENTS												
	TOTAL	0	0	0	0	1	0	0	0	0	0	0	0
Birchanger Road – South Norwood Primary School	AGREE COMMENTS					1	4						
	DISAGREE COMMENTS		1	1		9	3	1	2			2	2
	TOTAL	1	1	1	1	17	3	3	0	0	2	2	4
Springfield Road - St Cyprians Greek Orthodox Primary	AGREE COMMENTS					6	2						
	DISAGREE COMMENTS				1	6	2						
	TOTAL	0	0	1	1	16	0	0	0	0	0	0	0
Dering Place - Howard Primary School TBC	AGREE COMMENTS					1	1						
	DISAGREE COMMENTS					1	1			1			
	TOTAL	0	0	0	0	4	0	0	1	0	0	0	0
Stroud Green Way, Oasis Shirley Park Primary, Stroud Green	AGREE COMMENTS					2	1						
	DISAGREE COMMENTS												
	TOTAL	0	0	0	0	3	0	0	0	0	0	0	0
Dunley Drive, Good Shepherd Catholic Primary & Nursery School	AGREE COMMENTS					1							
	DISAGREE COMMENTS						3						
	TOTAL	0	0	0	0	4	0	0	0	0	0	0	0
New Barn Lane, Kenley Primary	AGREE COMMENTS					3	2						
	DISAGREE COMMENTS					9	4						
	TOTAL	0	0	0	0	18	0	0	0	0	0	0	0
Gonville Road, Gonville Academy	AGREE COMMENTS					7	1						
	DISAGREE COMMENTS					3	1						
	TOTAL	0	0	0	0	12	0	0	0	0	0	0	0
Stanhope Road, Park Hill Infant School	AGREE COMMENTS	1				3	8						
	DISAGREE COMMENTS					5	4						
	TOTAL	1	0	0	0	20	0	0	0	0	0	0	0
Krishna Avanti - Southbridge Place	AGREE COMMENTS					1	1						
	DISAGREE COMMENTS					3							
	TOTAL	0	0	0	0	5	0	0	0	0	0	0	0
		1	1	1	1	66	48	1	2	1	0	2	2
		2	2	2	2	114	3	3	1	1	0	4	4

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Agenda Item 8

REPORT TO:	Cabinet 12th October 2022
SUBJECT:	Financial Performance Report – Month 5 (August 2022)
LEAD OFFICER:	Jane West, Corporate Director of Resources (Section 151)
CABINET MEMBER:	Councillor Jason Cummings Cabinet Member for Finance

SUMMARY OF REPORT:

This report provides the Council's annual forecast as at Month 5 (August 2022) for the Council's General Fund (GF), Housing Revenue Account (HRA) and the Capital Programme (CP). The report forms part of the Council's financial management process for publicly reporting financial performance against its budgets on a monthly basis.

FINANCIAL IMPACT

	Forecast Month 5	Forecast Month 4	Movement
	£m	£m	£m
General Fund over/(underspend)	10.5	9.5	1.0
Housing Revenue Account over/(underspend)	3.2	3.1	0.1

	Original Approved Budget 2022/2023	Actual to Date as at 31/08/22	Forecast for year end 2022/2023	Forecast Variance for year end 2022/2023
	£m	£m	£m	£m
Capital Programme	134.152	12.622	123.387	(10.765)

The Month 5 position for the General Fund shows a worsening of **£1.064m** in the forecast outturn for 2022/23 since Month 4, mainly due to the Housing service seeing an increase in demand for temporary accommodation and rising rental costs.

The Month 5 end of year projection for the General Fund is indicating a net overspend of **£10.547m** against the budget.

There are a further set of risks and opportunities, which indicate a net opportunity of **£1.838m** (risks **£10.769m** and opportunities of **£12.607m**) most of which are not yet sufficiently developed to be included in the outturn forecast.

Should all these risks materialise, and none of the mitigations be effective, the Council could overspend by **£21.316m**. However, if none of the risks materialise and all the opportunities are delivered, the Council could underspend by **£2.060m**.

It should be noted that the overall financial position of the Council suggests it is highly unlikely that it will be possible to use the existing £6.887m corporate budget to top up the Council's reserves in 2022/23. This budget is currently included as an opportunity in this month's report but from next month will be moved into the end of year projected outturn. Had this been actioned this month, the projected overspend this month would have been £3.6m. This is reflected at 2.18 which sets out the current projection for reserves at the end of the year.

Work is continuing to look at measures to mitigate the forecast overspend and avert any further adverse impacts on the forecast. Early mitigating actions are reported as opportunities in this report. The impact of the in-year position is also being considered as part of the planning for 2023/24.

Paragraph 2.15 includes a Deficit Recovery Plan which sets out the actions the Council is taking to mitigate the projected overspend, which together with minimising risks and maximising opportunities is designed to eliminate the overspend by the end of the financial year.

Section 3 details these risks and the risk mitigations that have been identified at this stage.

The Housing Revenue Account is forecasting a **£3.210m** overspend variance against budget at the end of the year, an adverse movement by **£0.063m** mainly due to inflation in energy costs.

The Capital Programme has spent **£12.622m** against a **£134.152m** budget in the fifth month. The end of year position is forecast to be an underspend of **£10.765m**.

The Executive Mayor in Cabinet is recommended to:

- 1.1 Note the General Fund is projecting a net overspend of £10.547m as at Month 5, or £3.6m assuming the budgeted contribution to reserves is moved from opportunities into the projected outturn. Service directorates are indicating a £25.316m overspend with a £14.769m underspend corporately.
- 1.2 Note that a further number of risks and compensating opportunities may materialise which would see the forecast year-end variance change. These indicate a net opportunity of £1.838m (risks £10.769m and opportunities of £12.607m) and are reported within Section 3 of this report. Should all these risks materialise, and none of the mitigations be effective, the Council is forecast to overspend by £21.316m. However, if none of the risks materialise and all the opportunities are delivered, the Council will underspend by £2.060m.
- 1.3 Note the further actions being taken, through development of the Deficit Recovery plan, to mitigate the projected overspend with a view to eliminating it by the end of the financial year. Further details are in paragraph 2.15.
- 1.4 To approve the non-delivery of the MTFS savings as indicated within Table 2b.
- 1.5 Note the Housing Revenue Account (HRA) is projecting an end of year position of a £3.210m overspend, mainly due to inflation in energy costs.
- 1.6 Note the Capital Programme spend to date for the General Fund of £7.644m (against a budget of £112.069m) with a projected forecast underspend of £7.715m for the end of the year.
- 1.7 Note the Housing Revenue Account Capital Programme spend to date of £4.978m (against a budget of £22.083m), with a projected forecast underspend of £3.050m for the end of the year.
- 1.8 Note, the above figures are predicated on forecasts from Month 5 to the year end and therefore could be subject to change as forecasts are made based on the best available information at this time.
- 1.9 Note, the Council continues to operate a Spend Control Panel to ensure that tight financial control and assurance oversight are maintained. A new financial management culture is being implemented across the organisation through increased scrutiny, such as the Assurance meetings, improved communication and budget manager training from CIPFA.

2. EXECUTIVE SUMMARY

- 2.1. The Financial Performance Report (FPR) is presented to each Cabinet meeting and provides a detailed breakdown of the Council's financial position and the in-year challenges it faces. It covers the General Fund, Housing Revenue Account and Capital Programme. The FPR ensures there is transparency in the financial position, and

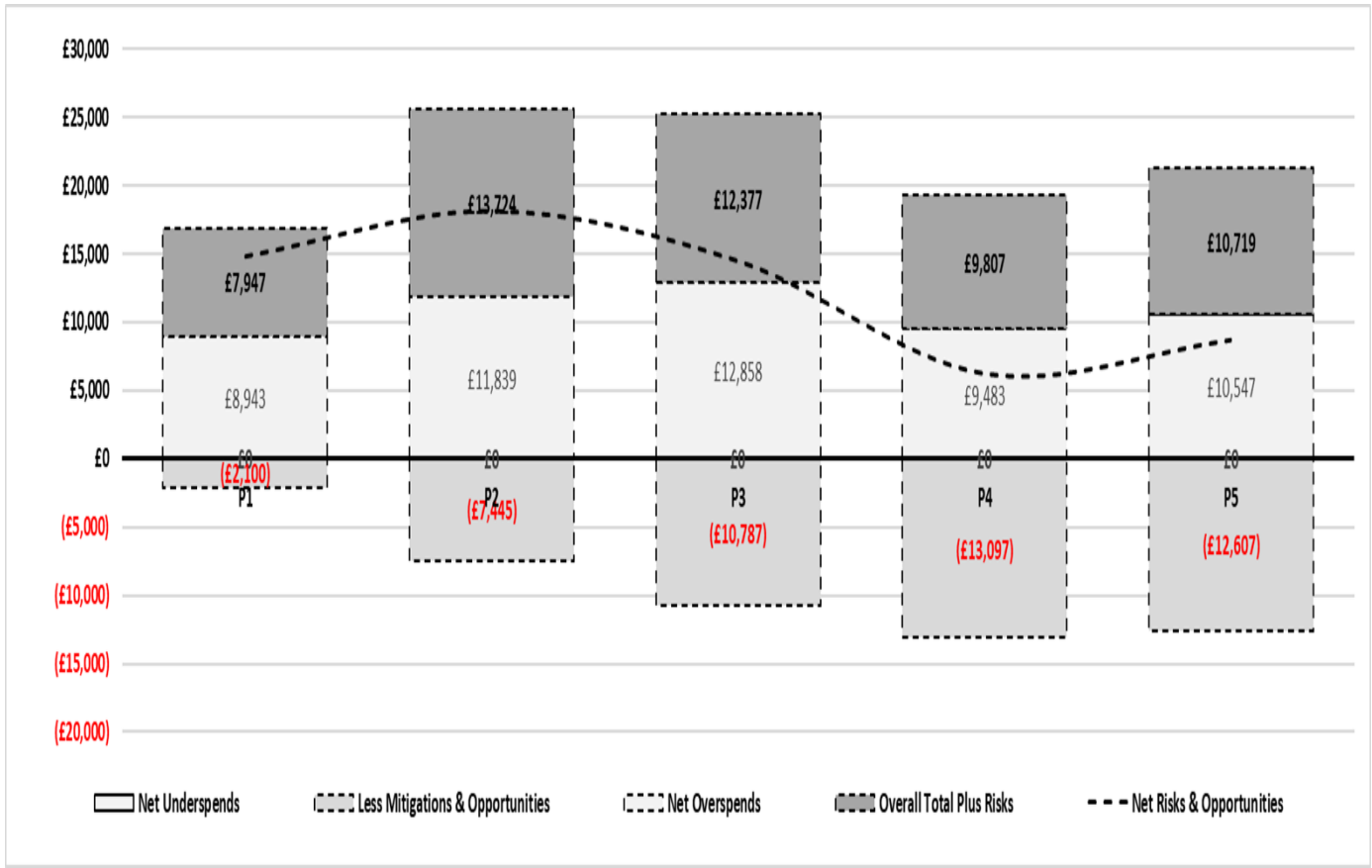
enables scrutiny by the Executive Mayor, Cabinet, Scrutiny, and the public. It offers reassurance regarding the commitment by Chief Officers to more effective financial management and discipline.

2.2. The General Fund revenue forecast outturn for Month 5 is an overspend of £10.547m. This is an adverse movement of £1.064m from Month 4.

2.3. There are a further set of risks and opportunities, which indicate a net opportunity of £1.838m (risks £10.769m and opportunities of £12.607m). The risks are not yet sufficiently developed to be included in the outturn forecast. Depending on how the risks and opportunities materialise, they may have a further negative impact on the projected outturn forecast. Should all the risks materialise, and none of the mitigations be effective, the Council is forecast to overspend by £21.316m. Key drivers of the projected overspend are non-delivery of savings agreed at Full Council in March 2022 and other new pressures previously not anticipated. However, if none of the risks materialise and all the opportunities are delivered, the Council will underspend by £2.060m. These are outlined in detail in Section 3 of this report.

2.4. The chart below illustrates the trend in the monthly monitoring reports for this financial year and shows both the forecast as well as the quantum of risks and opportunities, together with the impact should all risks and opportunities fully materialise (dashed line).

Chart 1 – Monthly financial movements on Monthly Forecast, Risk & Opportunity



- 2.5. Further work continues to bring the pressures down and find new mitigations so that the Council ensures that it stays within budget. Early mitigating actions for the projected overspend are reported within the opportunities contained in this report. The impact of the in-year position is also being considered as part of the planning for 2023/24.
- 2.6. The Housing Revenue Account is forecasting an overspend of £3.210m (an increase of £0.063m on the Month 4 forecast).
- 2.7. The Capital Programme for both the GF and HRA is reporting a total expenditure to date of £12.622m of which £7.644m is within GF and £4.978m for the HRA. The overall capital spend is projected to be £123.387m against a budget of £134.152m. This will result in a £10.765m underspend to budget. A review is currently underway of the Capital Programme with a view to further reducing spend in 2022/23.
- 2.8. The 2022/23 General Fund forecast includes the use of a £25m agreed capitalisation direction, to balance the Council's revenue budget. The capitalisation direction was approved (minded to) by the Department of Levelling Up, Housing and Communities (DLUHC) in March 2022 subject to regular positive reports from the Improvement and Assurance Panel and the Budget was approved at Full Council on 7th March 2022.
- 2.9. This report forms part of the reporting framework on the delivery of the Croydon Renewal Plan by ensuring the delivery of the Council's budget is reported monthly and transparently.
- 2.10. The format of this report will continue to evolve and expand as it will be important for the Council to be able to identify the additional pressures that the global economic crisis is causing in inflation and the impact on supplies and services the Council provides.
- 2.11. The Council continues to build on the improvements in financial management that were made over the past year however there is a considerable amount yet to do, which is fully recognised within the organisation. The Council's financial recovery is outlined within the current three-year MTFS. The second year of that strategy has always been recognised as the toughest of the three to deliver as the Council steps down from its reliance on capitalisation directions that allow it to meet revenue costs from capital funding.
- 2.12. The Opening the Books Project is underway to further assure the Council's financial position, the full results of which will be available by January 2023. The project is examining the last three years of the Council's accounts as potential errors have been identified in areas such as the accounting for Croydon Affordable Homes, the calculation of capital charges and the allocation of charges between capital, the Housing Revenue Account and the General Fund. These findings are delaying the completion of the Council's outturn position for 2021/22. The project is also examining the accuracy of budgets and the methodology and process for setting them. As an

example, overspends totalling £19m have arisen from mistakes in setting three specific budgets:

- Parking income – the reduction in demand for parking in the borough following the pandemic should have been better reflected in the assumptions for projected activity in 2022/23
- New traffic income projections were included with insufficient contingency built in to reflect the operational challenges of implementing new traffic schemes
- A deficit in the Housing Benefit budget for 2021/22 should have been recognised earlier. It was only picked up at the very end of the year and therefore has not been built into the 2022/23 budget.

2.13. In addition, and as this report identifies, the Council continues to face significant financial pressures. The delivery of Year 1 of the MTFs / financial recovery plan (2021/22) was aided by covid depressed demand for Council services that enabled the monthly expenditure to be reported as an underspend in many areas. Demand has begun to pick up for some Council services which is removing that underspend. There are also early signs of demand increasing for some services due to the cost-of-living pressures. In addition, some resident behaviour has changed since covid and this is having an impact on revenue. The inflationary pressures reflected in the forecast outturn are significant and further detailed at 2.20.

2.14. The outturn forecast identifies an overspend that the Council will need to mitigate. This report flags a number of other risks that could be realised and be declared in the outturn forecast during the year which would further worsen the position.

2.15. Over the last financial year, a monthly budget assurance process and independent challenge of expenditure by the Improvement and Assurance Panel took place. This is in addition to Cabinet, and Scrutiny and Overview review. The monthly budget assurance process has been reviewed and strengthened based on the learning from last year. The aim of the officer assurance meetings is to provide the Corporate Director of Resources (Section 151 Officer) and the Chief Executive with an opportunity to scrutinise and challenge the forecast outturn, review risks and opportunities to mitigate, challenge the use of accruals and provisions, ensure savings are delivered and income targets are met. Overall, the meetings ensure the Council is doing all it can to reduce overspends and deliver a balanced budget.

Deficit Recovery Plan

2.16. Each Directorate has been asked to identify mitigations and in year cost reductions to ensure that the Council brings its expenditure within budget to avoid any call on reserves. The following table sets out the mitigations proposed to date. Where the proposals are confirmed, their impact is already included in the projected outturn for the year. Where there is further work to be done to confirm them, they are included in this report as opportunities.

	£m	Allocation with P5
Delivery Plans in Forecast		

	£m	Allocation with P5
Duplication of interest costs budget in Resources	2.400	Included within Resources forecast.
Increased Court Costs Income	0.700	Included within Resources forecast.
Council Tax Support Scheme	1.100	Included within Resources forecast.
Reduction in loan non-repayment provision	1.400	The Council plans to release a £1.4m provision previously set aside to support potential risks to commercial loans. The loan is now likely to be repaid in full.
Election Account	0.241	Included within Assistant Chief Executive
Forecast Total	5.840	
Delivery Plans as Opportunities		
Public Health	1,000	Cross department reallocations of budgets, detailed in opportunities.
Housing Benefits	0.815	Included within Resources opportunities
Staff changes	0.100	Included within Resources opportunities
Children's Services Legal Costs	0.570	Included within Children's opportunities
External Grants in Children's Services	0.800	Included within Children's opportunities
Children Operational savings	0.500	Included within Children's opportunities
CIL substitution for General Fund expenditure	0.500	Included within SCRER's Opportunities
Delays in the capital programme	0.605	Reduced amount of £605k included within Corporate as opportunities
Opportunities Total	4.890	
Total	10.730	

2.17. In addition, the Council may not need to use the budgeted addition to its reserves of £6.9m in 2022/23. The financial year 2021/22 is still subject to further work, but the early indications are that reserves will be sufficient and that a further contribution may not be required. Should it not be necessary to transfer the full £6.9m into reserves, the Council's net expenditure would decrease by £6.9m.

2.18. The table below gives details of the general fund balances position as set out in the February 2022 budget report. Note that given a number of years accounts are still open the first 1st April 2022 opening balance may change.

2.19. The current financial position of the Council suggests it is highly unlikely that it will be possible to use an existing £6.887m corporate budget to top up the Council's reserves in 2022/23. This budget is currently included as an opportunity in this month's report but from next month will be moved into the end of year projected outturn. Had this been actioned this month, the projected overspend this month would have been £3.6m. This is what is set out in the table below.

General Fund Balances	£M
1st April 2022	27.5
Planned Contributions to/(from) Reserves	6.9
Underspend against the Planned Contributions budget	-6.9
Projected overspend	-3.6
Forecast 31st March 2023	23.9

2.20. Further work will be undertaken to add to the Deficit Recovery Plan. Without this Deficit Recovery Plan the Council's pressures would have been considerably higher. The macroeconomic climate is causing further pressure on the Council particularly from a very tight labour market and significant inflationary pressures. Energy expenditure will increase considerably as the UK sees significant increases in wholesale costs. The Council is mindful of the Chancellor's announcement with regards to Energy Bill Relief Scheme which will help towards some of these costs. Further review will need to be done on this however, this proposal will allow the Council to apply for discounts on its energy bills, which will be provided by the energy supplier. The energy supplier will then be able to claim the funds from Government. The key calculation in regard to usage the current rates paid will need to be made and assessed against the support criteria.

2.21. The macroeconomic climate is causing further pressure on the Council particularly from a very tight labour market and significant inflationary pressures. Energy expenditure will increase considerably as the UK sees significant increases in wholesale costs. The Council has budgeted a 5% inflationary uplift on all its contracts costs which is a prudent level compared to historic standards. However current inflation rates, which are around 10% and therefore significantly higher than budgeted, pose an added challenge that the Council does not have full control over. The Council cannot absorb all inflationary costs itself and will need to find ways to ensure the burden of these costs is fairly shared with our suppliers and customers.

2.22. The Council's overall financial position is still subject to a number of unresolved issues. The Opening the Books project is currently underway reviewing many aspects of the Council's accounts, the results of which will be reported by January 2023. The Council is continuing to work closely with the external auditors on finalising the 2019/2020 and 2020/2021 audit of accounts and is in the process of completing the accounts for 2021/22. The 2019/20 accounts require a resolution in relation to the accounting treatment of Croydon Affordable Homes and Croydon Affordable Tenures which, as previously reported, may have a c£70m impact on the Council's available reserves. Work is ongoing in this area in collaboration with Grant Thornton, the Council's External Auditors. All these areas of work may have implications for this year's budget.

3. COST OF LIVING CONSIDERATIONS

- 3.1. This report focuses on the Council's budget forecast. It highlights that there are a number of inflationary pressures that the Council, like all local authorities, is managing. The inflation level is at the highest level for 40 years. This impact goes beyond the Council – cost of living is affecting all households and businesses.
- 3.2. These macro-economic factors are impacted by international events, and therefore well beyond the controls of Croydon Council. Despite the limitations, the Council is seeking to support households wherever possible.
- 3.3. A dedicated cost of living information hub has been established on the Council's website. This provides a single source of information, informing residents of the financial support available and signposting to further support, advice and guidance. This information is continually reviewed, updated and improved.
- 3.4. At a national level, household support has been announced in the form of a revised energy price guarantee, designed to limit the inflation on household energy bills. Households with a domestic energy connection are eligible for a £400 discount this winter. Residents on means-tested benefits will receive a £650 cost of living payment from Government. Further announcements expected on 23 September.
- 3.5. The Council provides a wide range of support for residents that may be struggling due to the cost of living pressures. These include:
 - Discretionary support fund for residents in financial hardship
 - Council Tax support – For residents on a low income or in receipt of benefits, Council Tax bills could be reduced by up to 100%
 - Benefits calculator, to ensure residents receive all the support they are entitled to
 - Energy advice, including heating and money saving options, through our Croydon Healthy Homes service
 - Free holiday activity clubs with healthy meals for children
 - Croydon Works to help residents into employment or get training to get them in to work
- 3.6. The cost of living information hub also signposts residents to a range of support provided by other organisations in Croydon, including:
 - NHS Healthy start vouchers for families
 - Free school meals
 - Support from voluntary, community and faith sector organisations
 - Support for businesses through the London Business Hub and the British Business Bank
 - CroydonPlus credit union offers affordable ways to manage money, including savings accounts and loans

4. FINANCIAL POSITION

- 4.1. The overspend of £10.547m is driven by two underlying factors, which are £9.545m non-delivery of savings and £1.002m other pressures which are expanded in section 4 of this report. Work is underway to further improve the budget setting process and the Opening the Books project is examining this area in order to identify further improvements that can be made.
- 4.2. Directorate teams and Finance colleagues meet monthly to review the forecast position for each area, including risks of overspending and identify further options to mitigate these. A table of risks and opportunities are provided within this section where applicable.
- 4.3. The forecast outturn for the General Fund is shown below in Table 1.

Table 1 – Month 5 Forecast per Directorate

	Forecast Variance as at Current Month 5	Forecast Variance as at Prior Month 4	Change From Month 5 To 4	Savings Non-Delivery as at Month 5	Other Pressures as at Month 5
	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)
Children, Young People and Education	(408)	(133)	(275)	300	(708)
Adult Social Care and Health	(505)	(217)	(289)	1,213	(1,718)
Housing	2,582	847	1,735	1,705	877
Sustainable Communities Regen & Economic Recovery	15,641	15,140	501	5,743	9,898
Resources	9,210	9,135	75	172	9,038
Assistant Chief Executive	(1,204)	(520)	(683)	412	(1,616)
Departmental Total	25,316	24,252	1,064	9,545	15,771
Corporate Items & Funding	(14,769)	(14,769)	-	-	(14,769)
Total General Fund	10,547	9,483	1,064	9,545	1,002

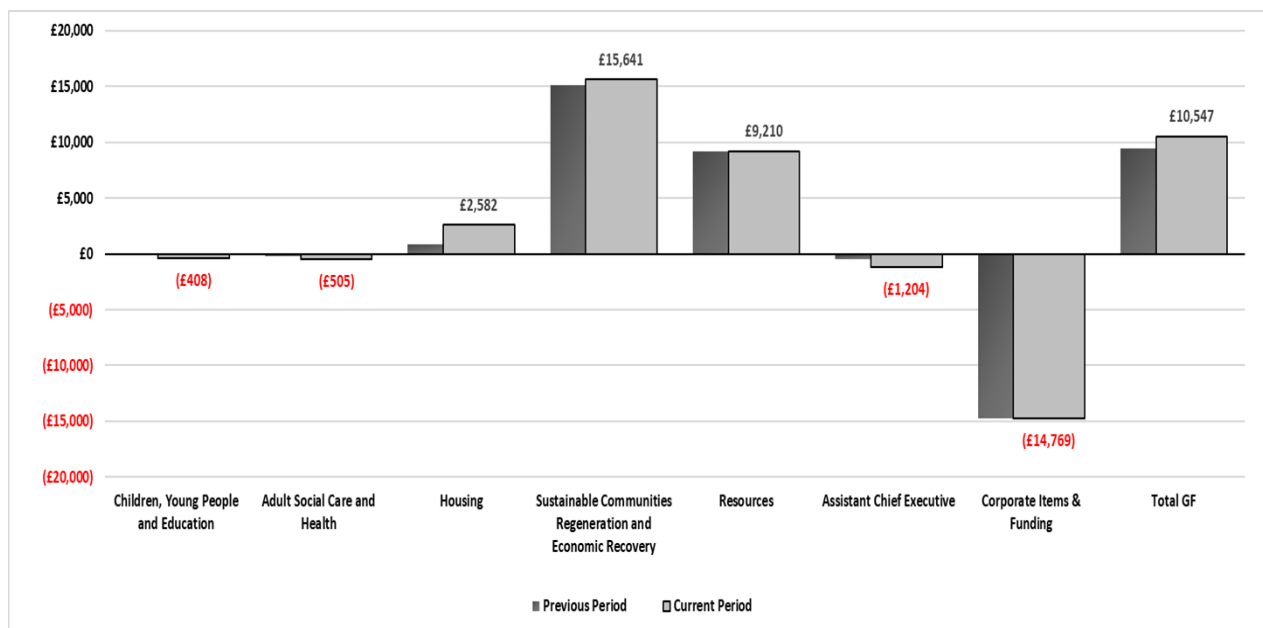
- 4.4. Net overspends and underspends within the service budgets are presented as a forecast variance (as per Table 1) and are additionally classified as either non-delivery of agreed in year savings or other pressures which were not foreseen or quantifiable at the time of setting the budget.
- 4.5. The main areas of movement from Month 5 are as follows:

- Adult Social Care and Health Directorate’s £0.289m **favourable** movement is due in the main to a staffing underspend particularly within provider services and the assessments team.
- Sustainable Communities, Regeneration and Economic Recovery Directorate’s **adverse** movement of £0.501m is mainly due to staffing pressures within the planning and development team
- Resources Directorate has moved £0.075m **adversely** from Month 4, which is largely as a result of one-off costs in relation to costs of the 2020-21 audit.
- Assistant Chief Executive has moved **favourably** by £0.683m mainly in relation to income projections and a review of the election account
- Housing Directorate is indicating a £1.735m **adverse** movement due to rising demand and costs for emergency accommodation.
- Children, Young People and Education Directorate is reporting a £0.275m **favourable** movement from Month 4 relates to staffing underspends.
- Corporate Budget has remained unchanged from Month 4.

Further details for each Directorate can be found in section 4 of this report.

4.6. The chart below shows the forecast by Directorate for both the current and previous month:

Chart 2: Forecast per Directorate as at Month 5



Risks and Risk mitigations

- 4.7. The outturn forecast has been reported excluding further potential risks and risk mitigations. Risks are split in to MTFS savings risks and other risks. Savings risks relate to savings proposals that were approved at Full Council in March 2022 to deliver a balanced budget. Other risks are risks that have risen from other operational challenges but not related to the delivery of savings. Risk mitigations are proposals that the services have identified that would mitigate their risks and help bring spend back within budget.
- 4.8. Savings are at various stages in their delivery, and it is important that the Council transparently reports the progress on these. Savings which are not deliverable are included within the forecast as overspends, however other MTFS savings which are at risk of non-delivery are reported in Table 2c, with Table 2b identifying savings not delivered. Table 2a below provides a summary of progress per directorate on delivery of their savings targets.

Table 2a – Progress on MTFS Savings

Division	Target Value £'000s	Balance Not Delivered (In Forecast) £'000s	On Track Value £'000s	Delivered Value £'000s	Current Month At Risk Value £'000s
Children, Young People and Education	(9,564)	300	7,046	1,077	1,141
Adult Social Care and Health	(16,500)	1,213	8,315	6,453	519
Housing	(2,841)	1,705	875	0	262
Sustainable Communities Regen & Economic Recovery	(12,396)	5,743	2,969	967	2,718
Resources	(3,029)	172	2,857	0	0
Assistant Chief Executive	(9,543)	412	8,281	250	600
TOTAL FOR MTFS	(53,873)	9,545	30,342	8,747	5,239

Table 2b – MTFS savings not delivered

Directorate & Saving Description	Target Value £000	Savings not Delivered £000
Adult Social Care and Health		
Refocusing Public Health funding	(380)	380
Baseline Savings - Disabilities Operational Budget	(4,371)	833
Assistant Chief Executive		
Fees And Charges	(19)	19
Increase in fees and charges	(93)	93
Rationalisation of software applications and contracts	(300)	300
Children, Young People and Education		
Refocusing Public Health funding	(300)	300
Housing		
Impact of maximising homelessness prevention	(578)	578
Impact of increasing speed of homelessness decisions	(101)	101
Increase use of LA Stock for EA/TA	(163)	163
Ending EA/TA where the council has no duty	(193)	193
Housing supply pipeline maximisation	(80)	80
Contract Reviews	(250)	250
Income Maximisation - Rent Collection	(240)	240
Resident Engagement & Tenancy Services £100,000 saving in 22/23	(100)	100
Resources		
Fees And Charges	(44)	28
Increase in fees and charges	(218)	144
Sustainable Communities Regen & Economic Recovery		
ANPR camera enforcement	(3,180)	2,040
Bus Re-Tender Contract Savings	(120)	40
Increase in Pre-Planning Applications	(66)	66
Independent travel optimisation	(20)	20
Introduction of a variable lighting policy	(417)	417
Parking charges increase	(650)	285
Private Sector Environmental Enforcement	(250)	125
Review and reduction of the Neighbourhood Operations (NSO team)	(950)	450
Revised Landlord Licensing scheme	(2,300)	2,300
Grand Total		9,545

- 4.9. Other risks and risk mitigations are split into quantified and unquantified items.
- 4.10. As with the outturn forecast set out in Table 1, risks are separately reported for those elements that relate to potential non or under-delivery of approved savings, as agreed by Full Council in March 2022, and those that are new and not directly related to agreed savings plans.
- 4.11. The Council is being transparent in flagging its risks that could potentially result in a change to the outturn forecast. This allows the Council to act and support these challenges before they become realised.
- 4.12. Table 2c below provides for details of MTFs savings that are at risk of non-delivery and Table 2d provides a list of quantified and unquantified other risks, which are in addition to the savings risks.
- 4.13. The report identifies savings at risk and mitigations for both the current and future years. Where risks are quantified currently, these are based on high level information and directorate experience of the service.

Table 2c – Month 5 MTFs Savings At Risk

MTFS Savings Ref	MTFS Savings Description	Savings at risk as at Month 5 (£,000's)	Savings at risk as at Month 4 (£,000's)	Change from Month 5 to Month 4 (£,000's)
21/22 CYPE 05	Review Support for Young People where Appeal Rights Exhausted	61	225	(164)
21/22 CYPE 06	Improve Practice System Efficiency	290	290	0
22/23 CYPE 07a and 7b	NHS Funding	790	790	0
Children, Young People and Education Total		1,141	1,305	(164)
21/22 ASCH 01	Baseline Savings - Disabilities Operational Budget	0	833	(833)
21/22 ASCH 05	Baseline Savings - Mental Health Operational Budget	83	83	0
21/22 ASCH 08	Baseline Savings - Older People Operational Budget	194	194	0
21/22 ASCH 04	Review of Contracts – Outcome Based Commissioning, Working Age Adults Commissioning and Public Health commissioning	132	132	0
21/22 RES 06	Contract savings	110	110	0
Adult Social Care and Health Total		519	1,352	(833)
22/23 HOUS 11	Procurement of Emergency Accommodation Contracts	0	100	(100)
22/23 HOUS 13	Income Maximisation - Rent Collection	0	101	(101)
22/23 HOUS 04	Repurpose under-utilised sheltered housing stock	158	158	0

22/23 HOUS 07	Ending Emergency Accommodation/Temporary Accommodation (EA/TA) where the Council has no duty	0	97	(97)
22/23 HOUS 09	Incentivising temporary accommodation leasing schemes	104	104	0
22/23 HOUS 01	Impact of maximising homelessness prevention	0	214	(214)
22/23 HOUS 02	Impact of increasing speed of homelessness decisions	0	40	(40)
22/23 HOUS 14	Resident Engagement & Tenancy Services £100,000 saving in 22/23	0	60	(60)
22/23 HOUS 03	Increase use of Council Stock for EA/TA	0	56	(50)
Housing Total		262	929	(667)
Various	Fees And Charges	350	350	0
22/23 SCRER 06	Review and reduction of the Neighbourhood Operations (NSO team)	260	260	0
22/23 SCRER 12	Contract Savings - Pay and Display Machines	300	300	0
22/23 SCRER 16	Private Sector Environmental Enforcement	63	63	0
22/23 SCRER 19	New gym in Monks Hill Leisure Centre	90	90	0
22/23 SCRER 20	Non-capital and contract impact of Purley Leisure Centre closure	50	50	0
22/23 SCRER 28	Merger of Management Functions in Place	100	100	0
22/23 SCRER 17	Parking charges increase	365	365	0
21/22 SCRER 11	ANPR camera enforcement	1,140	1,140	0
Sustainable Communities Regen & Economic Recovery Total		2,718	2,718	0
22/23 COR SAV 09	Rationalisation of software applications and contracts	0	300	(300)
22/23 ACE 18	Contract Savings - Managed Service Provider for Temporary Agency Resources £600K saving in 22/23	600	600	0
Assistant Chief Executive Total		600	900	(300)
Total Savings at Risk		5,239	7,204	(1,964)

Table 2d – Other quantifiable and unquantifiable risks

Quantified Risks	P5 £'000	P4 £'000	Details of Risk
Children, Young People and Education	2,284	2,284	Capitalisation income This is a historic income budget that was added to Children's Social Care. This amount was funded from capital receipts until 2020/21
			CLA Cost of Living There is an expectation that children in care providers will increase placement costs as cost of living rises
Adult Social Care and Health	-	-	None
Housing	2,000	-	Emergency Accommodation (EA) Bad Debt Provision The workings behind the forecast for the bad debt provision need reviewing as the model is suggesting increases in the forecast whilst collection rates have improved
			Emergency Accommodation Activity levels Targeted changes to service operation have been made to reduce the number of people supported by the EA service. These changes are embedded at August 2022 but the financial ledger and other reporting do not reflect lower numbers in the service but instead suggest that numbers are increasing. Investigatory work is about to commence to better understand the activity drivers and the links to the financial results and ensure a more accurate forecast can be brought in future months.
Sustainable Communities Regen & Economic Recovery	646	319	NSO (£125k) The service is dependent on the closure of the NSO Team and any delays in implementation of the proposal will have an impact on delivery of the saving.
			Planning Income (£325k) There is a £352k risk to planning income between now and the end of the year down to two reasons. A) Number of and income from major applications is down considerably from last year. 22/23 Period 5 £99k income as opposed to 21/22 Period 5 £300k income
			B) Income at risk from planning applications exceeding the 8(minor)13 (major) week statutory timeframes which can result in reimbursement of fees if not met. This has started to increase and therefore there is a risk that more will be refunded and therefore increase the pressure on the service. It should be noted that the reason for increased

Quantified Risks	P5 £'000	P4 £'000	Details of Risk
			<p>expenditure on staff for Period 5 has been to try and mitigate this.</p> <p>Capital Staff Recharges (£169k) As there is no TfL capital funding thus far this year, this is creating a risk of not being able to recharge staff time to capital at the level anticipated in the budget.</p>
Resources	-	-	None
Assistant Chief Executive	-	-	None
Corporate Items & Funding	600		NJC pay Award for 2022/23 - the current budget held corporately for the pay award may not be sufficient to cover the current pay offer of a flat rate of £1,925 per employee
Total Quantified Risks	5,530	2,603	

Un-Quantified Risks	P5 £'000	P4 £'000	Details of Risk
Children, Families and Education	-	-	None
Adults, Health and Social Care			Potential post Covid-19 pandemic latent demand working through the population resulting in additional care packages placements.
			Inflation , rising fuel and food costs significant expenditure for care providers - may result in claims for increased fees or face financial instability
			High vacancy rate is caused by significant challenges in recruitment across the Directorate. This means staff are focussed on statutory delivery, rather than transformation. This is a national issue.
			There is Hospital discharge pressure as the current system risk is running at winter levels due to Covid and backlog despite being summer. Work is being done on a deep dive, as the numbers of placements and equipment cost are rising.

Housing			New Housing Structure (temporary) There remains a temporary structure within Housing, including an Interim Director of Tenancy Services. A change programme is being developed and a bid for Transformation Funding to resource it has been submitted.
Sustainable Communities Regen & Economic Recovery			Highways and Parking Although unknown at this stage there is a potential risk to New Roads and Street Works Act Income due to delays and disputes with Utility Companies. Further work is being undertaken to quantify these risks and where possible mitigate the effect.
Resources			Legal Trading Model The legal trading services model is under review. Until this review is completed officers are flagging this area as a risk. Last year Legal Services were overspent by £306,000.
Assistant Chief Executive			Risk based upon the lack of available graves for sale until the cemetery extension opens
			Increased competition from neighbouring facilities, perceived increase in direct cremations, viewed as the cheaper option for families as inflation starts to take effect
Corporate Items & Funding	-	-	None
Total Un-Quantified Risks			

4.14. Table 3 provides a list of quantified and unquantified risk mitigations or opportunities. These are potential risk mitigations that will require further assurance to be included within the forecast. Service managers have identified these as potential mitigations to the risks identified Tables 2a, 2c and 2d.

Table 3 - Quantifiable and unquantifiable opportunities

Quantified Opportunities	P5 £'000	P4 £'000	Details of Opportunities
Children, Young People and Education	(2,170)	(2,170)	External grants (£0.800m) Increasing the income budget in 2022/23 in line with the actual grants
			Children Service legal costs (£0.570m) Review on operations to mitigate legal costs arising from challenges from service users. The aim is to improve the operations and process to ensure all aspects of support is carefully provided

Quantified Opportunities	P5 £'000	P4 £'000	Details of Opportunities
			<p>Operational Efficiency Savings in Children Social Care (£0.500m) Sustained impact of hybrid working has reduced use of workplace supplies and services across CYPE.</p> <p>Public Health (£0.300m) Ongoing Internal Review of Public Health Funding towards related expenses</p>
Adult Social Care and Health	(380)	(380)	<p>Public Health (£0.380m) Ongoing Internal Review of Public Health Funding towards related expenses</p>
Housing	-	(790)	None
Sustainable Communities Regen & Economic Recovery	(730)	(730)	<p>Community Infrastructure Levy Review (£0.500m) Further use of CIL monies to support revenue expenditure where the conditions met being reviewed.</p> <p>Streetlighting review (£0.230m) Current pilot is being evaluated.</p>
Resources	(915)	(915)	<p>Measures to reduce Housing Benefit subsidy loss (£0.815m) Measures to reduce Housing Benefit subsidy loss</p> <p>Staffing Review (£0.100m) Staff reviews that may lead to further savings in salary costs</p>
Assistant Chief Executive	(320)	(620)	<p>Public Health (£0.320m) Ongoing Internal Review of Public Health Funding towards related expenses.</p>
Corporate Items & Funding	(8,092)	(7,492)	<p>Reduced borrowing need (£0.605m) Potential saving as a result of a review of borrowing costs to fund the capital programme.</p> <p>Release of Corporate Reserve Top Up (£6.887m) The Council will consider if this top up is required. If not, it will represent an underspend which will contribute to the Deficit Recovery Plan.</p> <p>Reversal of National Insurance Increase (£0.600m) The government has announced that the National Insurance increase of 1.25% for employers and employees will be reversed from 6 November 2022</p>
Total Quantified Opportunities	(12,607)	(13,097)	

Un-Quantified Opportunities	P5 £'000	P4 £'000	Details of Opportunities
Children, Young People and Education	-	-	None
Adult Social Care and Health	-	-	None

Un-Quantified Opportunities	P5 £'000	P4 £'000	Details of Opportunities
Housing			New Housing Structure (temporary) We have a new temporary structure within Housing, including an Interim Director of Tenancy Services and three Change Managers, approx £100k. We have bid for Transformation Funding to resources these additional positions.
Sustainable Communities Regen & Economic Recovery	-	-	None
Resources		-	Recovery of utilities debt from schools still owed from when bills were paid by the council and recharged to schools rather than been billed direct
Assistant Chief Executive	-	-	None
Corporate Items & Funding	-	-	None
Total Un-Quantified Opportunities			

DIRECTORATE VARIANCES

4.15. Children, Young People and Education (CYPE)

At Month 5 a **£0.408m underspend** has been forecast alongside £1.141m of MTFS savings at risk of non-delivery together with £2.284m of other risks against £2.170m of opportunities. This is a favourable movement from Period 4 of £0.275m.

The £0.408m underspend is net position of £0.300m of non-delivery of the MTFS saving related to Public Health funding offset with a net benefit of £0.708m through underspends in Children's Social Care of £0.560m and £0.148m in non-DSG Education services.

The Directorate has also identified £2.284m of other risks in Table 2(b) which if realised could have a material impact on the CYPE forecast. These relate to cost pressures such as inflationary pressures above and beyond Council budgets and loss of income or contribution from the Council's partners.

However, the Directorate has identified potential opportunities of £2.170m from re-purposing grants and reducing legal costs substantially due to a reduction in age related assessment challenges.

4.16. Adult Social Care and Health (ASCH)

At month 5 an **underspend of £0.505m** is forecast with £0.519m MTFS savings at risk of non-delivery. The risk of savings non-delivery has reduced by £0.723m.

However, this is due to £0.833m risk being realised and is now reflected in the outturn forecast. In addition, following the transfer of the Commissioning function from Resources to ASCH, there is a £0.110m additional risk for contact savings. Quantified opportunities remain the same as Month 4.

The forecast underspend of £0.505m is a net position, the key items being:

- £1.497m underspend in staffing which, in return, is a barrier to achieving savings. There is a national shortage of both social workers and occupational therapists.
- £1.002m underspend following the detailed review of 21/22 accruals for disputed care costs which have been settled at a lower level than was accrued, and for planned care costs. It is usual that care is delivered at a lower level than planned for many reasons including delayed hospital discharge, temporarily staying with family etc. However, this year is slightly higher than normal which is believed to be Covid related.
- £0.833m overspend relating to the unachieved savings which had previously been shown as at risk.
- £0.725m overspend in care for 18-25 year old Transitions clients which remains the same as period 4 monitoring.

Unquantified Risks present continued concerns as to their impact upon the Directorate budget over the remainder of the financial year:

- Potential post COVID-19 latent demand working through the population resulting in additional care package placements and community equipment.
- Inflation, rising fuel costs will result in significant expenditure for ASC Providers – may result in claims for increased fees and/or financial instability with potential for 'handing back' contracts.
- Hospital discharge pressure as current system risk is running at winter activity levels due to COVID-19.
- High vacancy rate is caused by significant challenges in recruitment across the Directorate. This means staff are focused on statutory delivery, rather than transformation. This is a national issue.

Continued detailed analysis of demand and cost will take place each month up to the end of the financial year to enable, where possible, an estimate of the value of these current Unquantified Risks as listed.

There are also opportunities of £0.380m identified in relation to public health.

Finance continues to work closely with the service providing deep dive analysis of the budgets in Transitions, Disability Services, Older Peoples Services and Mental Health to support additional quality assurance.

4.17. Housing

At Month 5, Housing is forecasting a **£2.582m overspend** in relation to temporary accommodation activity in particular overnight paid accommodation, with key risks related to non-delivery of £0.262m of savings, and £1m of other quantifiable risks

having been identified that relate to emergency accommodation activity levels and the provisions for bad debts. However, the Directorate is looking to draw down £0.790m of housing reserves to support in year pressures and have identified this as an opportunity subject to further review. This will only be released once all other in-year mitigations have been exhausted.

The service is seeing an increase in demand for temporary accommodation and is also facing rising rental costs as the Council struggles to find viable accommodation.

4.18. **Sustainable Communities, Regeneration & Economic Recovery (SCRER)**

In Month 5, SCRER is forecasting a net **overspend of £15.641m**.

The main area of overspend relates to £10.5m shortfall in parking income, £0.950m relating to streetlighting energy costs and £0.5m SEN transport costs. This position has moved adversely from Month 4 by £0.501m.

There are also £0.646m other risks identified and £2.718m of MTFs savings at risk. However, the service has identified £0.730m of opportunities which will need to be worked through to confirm their achievability.

The service areas that are experiencing these overspends are within the Sustainable Communities division and particularly in the parking teams. Demand for parking services has not returned to pre-pandemic levels and this is affecting all areas of parking which includes, ANPR, pay and display and on-street parking. The division is also expecting delays in obtaining a license from government to run the Selective Licensing scheme which is further adding pressure of £1.580m.

The Council applied to renew its Landlord Licensing scheme in 2021/22 to the Department of Levelling Up, Housing and Communities (DLUHC). The Council budgeted for £1.5m of income that would be achievable from the scheme in this financial year. However, the scheme was rejected by the Secretary of State for DLUHC due to the lack of a Housing Strategy, one of the requirements for the scheme. The development of the Housing Strategy is being progressed but has not yet been completed due to the many other pressures on the Housing Service and the focus on the delivery of the Housing Improvement Plan. It also requires a review of the Council's policy for Landlord Licensing. It is expected that this will not be completed within the next 12 months and therefore for prudence the service is forecasting the non-delivery of the £1.5m income target.

Further pressures are experienced within Planning and Sustainable Regeneration Services particularly in relation to Building Control income and income from Planning.

4.19. **Resources**

At Month 5, there is a **£9.210m overspend** projected which is an adverse movement from Month 4 of £0.075m.

The overspend is largely related to loss in housing benefit (HB) subsidy and projected increases in energy costs across the Council's corporate estates. The £7.685m

overspend on HB is due to the difference between the value of HB expenditure and funding received from DWP on support exempt and temporary accommodation. A cross council working group is currently working to mitigate this over the next few years.

A further pressure of £4.223m is due to increased energy costs on utilities for the Council estate. £3.5m will be drawn down from the corporate inflation provision to mitigate part of this overspend. The pressures on Estates, Asset Management & Facilities are being netted off against a net saving of £1.551m. This relates to an historic budget for interest costs which is already covered within a corporate budget, offset by MTFs savings targets that are unachievable. Currently there is a predicted overspend of £0.279m in Corporate Finance & Treasury. This relates to higher than budgeted spend on specialist finance work and agency costs pending a restructure of the department.

There are no additional savings at risk and no further risks are reported at this point. Unquantifiable opportunities of £0.915m have been identified to try and mitigate the HB subsidy loss in year and reduce staffing costs.

4.20. Assistant Chief Executive

At Month 5, a **£1.204m underspend** is being projected, which is a favourable movement of £0.683m from month 4. Continued review on the income projections related to registrars and bereavement services has indicated a further improvement to Month 4. Reconciliation of the position regarding the Election account has realised a £241k favourable in month movement. This was highlighted as an opportunity at P4. Further planned staffing reviews have achieved savings of approximately £300k across the Directorate.

At this early-stage work is still being carried out to review fees and charges which were devolved to the service without consideration of demand. The council wide exercise that is taking place will enable the services within ACE to more accurately forecast income and until such time that this is completed, the pressure of £205k is factored within the forecast. The rationalisation of software applications project has identified £450k of mitigations, which have been included within the forecast, and further work is being carried out to focus on the remaining £300k.

For 2022/23 the remaining £300k can be met within budget underspends elsewhere in the department. Ongoing work will aim to ensure this in year saving is converted to a permanent budget saving from 2023/24.

4.21. Corporate

At Month 5, the corporate position is projecting an **underspend of £14.769m**. The corporate budget holds funding and financing streams such as Council Tax, Business Rates income share and General Revenue Support Grant income. The corporate budget also allocates Council wide risk contingency, inflation growth budgets and budgets to fund corporate debt and interest charges.

There has been no movement from Month 4 in the corporate projection. The projected underspends against contingency budgets and risk provisions will offset the projected overall overspend. A provision of £1.400m has been released and relates to risks to a key commercial loan which is now expected to be fully paid back in full. The total risk and provision underspends are £10.769m.

Corporate Finance have also identified a further one-off £4.0m of reserve drawdown in 2021/22 to support the in year inflationary pressures that the Council is facing as a result of macroeconomic factors which are largely not in the Council's control. A further opportunity has been identified due to the reversal of the 1.25% National insurance increase which has now been reversed.

A risk of £0.6m has been identified relating to the NJC staff pay award for 2022/23. The budget held corporately may not be sufficient to cover the current pay offer of £1,925 per employee.

Table 4 below summaries the overall position:

Table 4 – Summary – Month 5 with Month 4 Comparator

	Month 5	Month 4	Variance
	(£,000's)	(£,000's)	(£,000's)
Table 1 - Forecast	10,547	9,483	1,064
Table2b - MTFs Savings - At Risk	5,189	7,204	(2,015)
Table2d - Other Quantifiable Risks	5,530	2,603	2,927
Table 3 - Quantifiable Opportunities	(12,607)	(13,097)	490
Total	8,659	6,193	2,466

5 Housing Revenue Account (HRA)

5.1 The **forecast overspend** across the HRA is **£3.210m** as at Month 5. This is made up of an additional £1.8m of inflationary pressure on utilities bills. There is additional inflationary pressure on the repairs service of £0.7m, and disrepair costs of £0.8m. Other variances include increased costs of managing the estates, £0.5m, and underspends from vacancies across the service (£0.6m). There is ongoing review of all budgets and recharges across the HRA to mitigate the existing pressures. Nonetheless, the HRA has sufficient ring-fenced reserves to meet the £3.210m overspend currently projected if in year mitigations can't be found.

Table 5 – Housing Revenue Month 5 forecast

SERVICES	Variance For Month 5	Variance For Month 4	Change From Previous Month	Explanation of Variations
	£'000	£'000	£'000	
Responsive Repairs and Safety	904	893	11	Of the variance £700k is a result of inflationary increases on the repairs programme contracts. Disrepair claims and fees of £787k. With vacant posts of £583k offsetting the listed pressures
Asset Planning and Capital Delivery	(158)	(15)	(143)	There are a number of vacancies within this service area
Allocations Lettings and Income Collection	432	337	95	The projected void losses are based on P5 performance. A programme is in place to address this. This pressure also includes garage rental voids
Tenancy and Resident Engagement	2,557	2,382	175	The forecast overspend is made up of an additional £1.8m pressure on utilities. Additional grounds maintenance costs; legal fees and legacy water charges are also included in the pressure.
Homelessness and Assessments	(0)	50	(50)	This is a recharge to the general fund for the provision of this statutory service through a HRA owned property.
Directorate & Centralised costs	(500)	(500)	(0)	There are vacancies within the centralised budgets. There is also a review underway to ensure charges have been correctly posted to other service areas within the HRA
	3,210	3,147	63	

6 Capital Programme

5.1 The General Fund and Housing Revenue Account capital programmes have currently spent £12.622m to the end of Month 5 against approved budgets of £134.152m. **Forecast spend is £123.387m** resulting in a forecast underspend of £10.765m.

5.2 Table 6 below summarises the capital spend to date by directorate with further details of individual schemes provided in Appendix 2. Table 7 gives details of how the capital programme is financed.

Table 6 – Capital Programme as at Month 5

Department	Original Approved Budget 2022/2023 £'000	Actual to Date as at 31/08/22 £'000	Forecast for year end 2022/2023 £'000	Forecast variance for year end 2022/2023 £'000
CHILDREN, YOUNG PEOPLE AND EDUCATION	15,964	889	7,021	(8,943)
ADULT SOCIAL CARE AND HEALTH	1,707	0	1,707	0
HOUSING	3,493	587	3,554	61
SUSTAINABLE COMMUNITIES REGEN & ECONOMIC RECOVERY	36,971	3,419	37,207	236
RESOURCES	11,430	1,574	13,586	2,156
ASSISTANT CHIEF EXECUTIVE	13,455	1,175	12,230	(1,225)
CORPORATE ITEMS & FUNDING	29,049	0	29,049	0
General Fund Total	112,069	7,644	104,354	(7,715)
HOUSING REVENUE ACCOUNT	22,083	4,978	19,033	(3,050)
CAPITAL PROGRAMME TOTAL	134,152	12,622	123,387	(10,765)

Table 7 – Capital Programme Financing as at Month 5

	Approved Budget 2022/23 £'000	Forecast as at P5 2022/23 £'000	Variance 2022/23 £'000
General Fund Capital Financing			
CIL	7,427	7,427	-
s106	2,461	2,441	(20)
Grants & Other Contributions	33,447	19,946	(13,801)
Capital Receipts	4,049	4,049	0
Reserves	70	70	0
Borrowing	64,615	70,721	6,106
Total Financing – General Fund	112,069	104,354	(7,715)
Housing Revenue Account Capital Financing			
Major Repairs Reserve	12,336	12,336	0
Reserves	9,747	6,697	(3,050)
Total Financing - HRA	22,083	19,033	(3,050)
TOTAL PROGRAMME FINANCING	134,152	123,387	(10,765)

7 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 5.1 Finance comments have been provided throughout this report.
- 5.2 The Council continues to operate with internal spending controls to ensure that tight financial control and assurance oversight are maintained, and a new financial management culture is being implemented across the organisation through increased communication on financial issues and training for budget managers.
- 5.3 In-year savings are being sought across the Council to mitigate the projected overspend. Early actions are reported in the opportunities contained within this report. The impact of the in-year position is also being considered as part of the early planning for 2023/24.
- 5.4 The Council currently has a General Fund Reserve of £27.50m which serves as a further cushion should not all the overspend be eliminated by the end of 2022/23. However, any use of these reserves would have to be reinstated in later financial years as it's a one off support and not a permanent solution.

(Approved: Jane West – Corporate Director of Resources & S151 Officer)

8.0 LEGAL CONSIDERATIONS

- 8.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Legal Services and Monitoring Officer that the Council is under a statutory duty to ensure that it maintains a balanced budget and to take any remedial action as required in year.
- 8.2 Section 28 of the Local Government Act 2003 provides that the Council is under a statutory duty to periodically conduct a budget monitoring exercise of its expenditure and income against the budget calculations during the financial year. If the monitoring establishes that the budgetary situation has deteriorated, the Council must take such remedial action as it considers necessary to deal with any projected overspends. This could include action to reduce spending, income generation or other measures to bring budget pressures under control for the rest of the year. The Council must act reasonably and in accordance with its statutory duties and responsibilities when taking the necessary action to reduce the overspend.
- 8.3 In addition, the Council is required by section 151 of the Local Government Act 1972 to make arrangements for the proper administration of its financial affairs. The Council's Chief Finance Officer has established financial procedures to ensure the Council's proper financial administration. These include procedures for budgetary control. It is consistent with these arrangements for Cabinet to receive information about the revenue and capital budgets as set out in this report.
- 8.4 The monitoring of financial information is also a significant contributor to meeting the Council's Best Value legal duty and therefore this report is published in accordance with that legal duty.

(Approved by: Sandra Herbert, Head of Litigation and Corporate Law and Deputy Monitoring Officer on behalf of the Director of Legal Services and Monitoring Officer)

8 HUMAN RESOURCES IMPACT

- 5.1 There are no immediate workforce implications as a result of the content of this report, albeit there is potential for a number of the proposals to have an impact on staffing. Any mitigation on budget implications that may have direct effect on staffing will be managed in accordance with relevant human resources policies and where necessary consultation with recognised trade unions.
- 5.2 The Council is aware that many staff may also be impacted by the increase in cost of living. Many staff are also Croydon residents and may seek support from the Council including via the cost of living hub on the intranet. The Council offers support through the Employee Assistant Programme (EAP) and staff may seek help via and be signposted to the EAP and other appropriate sources of assistance and advice on the Council's intranet.

Approved by: (Gillian Bevan, Head of HR, Resources and Assistant Chief Executives on half of Dean Shoemith, Chief People Officer)

9 EQUALITIES IMPACT

- 10.1 The Council has a statutory duty to comply with the provisions set out in the Sec 149 Equality Act 2010. The Council must therefore have due regard to:
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act.
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 10.2 In setting the Council's budget for 2022/2023, all savings proposals must complete an Equality Impact Assessment. As Officers deliver against the approved budget, including the savings within it, they will continue to monitor for any unanticipated equality impacts. If any impacts arise, officers will offer mitigation to minimise any unintended impact.
- 10.3 The core priority of the Equality Strategy 2020-2024 is to tackle ingrained inequality and poverty and tackling the underlying causes of inequality and hardship, like structural racism, environmental injustice and economic injustice. The budget should take due regard to this objective in relation to each protected characteristic. The Borough's responsibility to asylum seekers, young people, disabled people and their families along with adults utilising social care provision is key to this regard. Though families and single parents are not classed as a protected characteristic under Equality Act 2010, the strategy commits to tackling inequality and tackling socio economic inequality so may also consider the impact on families.

- 10.4 The cost-of-living increase has impacted heavily on the most economically vulnerable in society. Energy increases have led to some vulnerable groups having to make a choice between heating and eating. Despite proposed increases in fees and charges being below the rate of inflation they may still have a detrimental impact on residents from our most vulnerable groups. This could potentially have an adverse impact on poverty and inequality and a socio-economic impact on residents. Deprivation in borough is largely focused in the north and the east where most ethnic residents from the African, African Caribbean and Asian communities reside.
- a. In setting this budget the Council has sought to mitigate the impact on all residents who may be economically affected at this time. Research states that the protected characteristics that are likely to be most impacted by fee rises and the cost of living increase are: young people, African and African Caribbean people, Disabled people and some pregnant women. There is also an intersectional aspect to the impact on equality, such as a higher impact on female mixed race disabled individuals and young Asian and African/African Caribbean young people been more affected. The Council have undertaken a wide range of initiatives to mitigate the affects for those in most need. The measures include: a cost-of-living hub, a range of financial support and advice including discretionary support and additional support payments, Council tax support, energy advice and a benefit calculator. Residents are also signposted to support from community partners in the delivery of initiatives to support residents such as healthy Schools Clubs. These packages are available to all eligible residents irrespective of equality characteristics and are targeted at those residents who are in the most need.
 - b. The full impacts of Covid 19 and long Covid on the Adult Social Care Service may not be apparent at this time. Evidence suggests that the impact of Covid 19 has resulted in an increase in care packages from Adult Social Care which places additional pressure on the service to deliver and meet the needs of vulnerable residents. There may also be a subsequent impact on disabled children along with their parents. It is essential to ensure that both groups receive an appropriate standard of care despite the pressure on services to reduce costs. Subsequently young people transitioning from Children's social care to Adults Social Care could impact heavily on budget dependent on the needs of individuals identified.
 - c. The impact on poverty and inequality may be increased for those residents who were economically affected by Covid 19 and are currently in rent arrears, have debt to energy companies or elsewhere.

(Denise McCausland, Equalities Programme Manager, Policy Programmes and Performance)

11 ENVIRONMENTAL IMPACT

- 5.1 There are no specific environmental impacts set out in this report

6 CRIME AND DISORDER REDUCTION IMPACT

- 5.1 There are no specific crime and disorder impacts set out in this report

6 DATA PROTECTION IMPLICATIONS

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

NO

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

NO, as the report contains no sensitive/personal data

Approved by Nish Popat – Interim Head of Corporate Finance

APPENDIX 1 – SERVICE BUDGETS AND FORECASTS MONTH 5

	Approved Budget (£,000's)	Current Actuals (£,000's)	Full-Yr Forecast (£,000's)	Projected Variance (£,000's)
C1410E : ADULT SOCIAL CARE OPERATIONS	111,275	52,002	110,831	(444)
C1405E : TOTAL ADULT SOCIAL CARE AND HEALTH DIRECTORATE SUMMARY	1,175	(1,372)	1,555	380
C1420E : ADULT SOCIAL CARE POLICY AND IMPROVEMENT	11,375	5,130	10,934	(441)
TOTAL ADULTS	123,825	55,761	123,320	(505)
C1305E : RESIDENT ENGAGEMENT AND ALLOCATIONS	8,175	377	10,784	2,610
C1310E : ESTATES AND IMPROVEMENT	82	144	54	(28)
TOTAL HOUSING	8,257	522	10,838	2,582
C1110E : SUSTAINABLE COMMUNITIES REGEN & ECONOMIC RECOVERY DIRECTORATE SUMMARY	(262)	325	(1,435)	(1,173)
C1120E : SUSTAINABLE COMMUNITIES	22,479	790	37,808	15,329
C1130E : CULTURE AND COMMUNITY SAFETY DIVISION	4,543	2,519	4,776	233
C1140E : PLANNING AND SUSTAINABLE REGENERATION DIVISION	696	1,941	1,948	1,252
TOTAL SUSTAINABLE COMMUNITIES REGEN & ECONOMIC RECOVERY	27,456	5,575	43,097	15,641
C1605E : RESOURCES DIRECTORATE SUMMARY	(6,901)	200	(6,910)	(9)
C1610E : DIRECTOR OF FINANCE	9,114	70,768	16,046	6,932
C1620E : PENSIONS DIVISION	343	556	261	(82)
C1625E : MONITORING OFFICER	2,094	851	2,097	3
C1630E : INSURANCE, ANTI-FRAUD AND RISK	1,018	1,158	821	(197)
C1640E : LEGAL SERVICES DIVISION	(1,644)	114	(1,378)	266
C1650E : INTERNAL AUDIT SERVICE	597	559	801	204
C1690E : COMMERCIAL INVESTMENT AND CAPITAL DIVISION	11,707	5,510	13,800	2,093
TOTAL RESOURCES	16,328	79,715	25,538	9,210
C1205E : CHILDREN, YOUNG PEOPLE AND EDUCATION	584	208	584	-

	Approved Budget	Current Actuals	Full-Yr Forecast	Projected Variance
	(£,000's)	(£,000's)	(£,000's)	(£,000's)
C1210E : CHILDREN'S SOCIAL CARE	72,417	21,839	71,857	(560)
UNACCOMPANIED ASYLUM SEEKING CHILDREN (UASC) AND CARE LEAVERS	(4,630)	1,433	(4,630)	-
C1220E : EDUCATION DIVISION - exc DSG	7,425	17,489	7,277	(148)
C1230E : QUALITY, POLICY AND PERFORMANCE IMPROVEMENT	5,978	841	6,278	300
TOTAL CHILDRENS, FAMILIES AND EDUCATION	81,774	41,811	81,366	(408)
C1505E : ASSISTANT CHIEF EXECUTIVE DIRECTORATE SUMMARY	(90)	361	22	112
C1510E : CROYDON DIGITAL AND RESIDENT ACCESS	23,149	10,303	22,664	(485)
C1520E : CHIEF PEOPLE OFFICER DIVISION	3,192	1,431	2,896	(296)
C1530E : POLICY, PROGRAMMES AND PERFORMANCE	6,111	5,468	5,576	(535)
C1540E : PUBLIC HEALTH	-	(10,752)	0	0
C1550E : SERVICE QUALITY, IMPROVEMENT AND INCLUSION	-	-	-	-
TOTAL ASSISTANT CHIEF EXECUTIVE	32,362	6,811	31,158	(1,204)

Appendix 2 – Capital Programme Month 5

Scheme Name	Original Approved Budget 2022/2023 £'000	Actual to Date as at 31/08/22 £'000	Forecast for year end 2022/2023 £'000	Variance to Date 2022/2023 £'000
Disabled Facilities Grant	2,993	512	2,993	-
Empty Homes Grants	500	15	500	-
HOUSING	3,493	527	3,493	-
Adults ICT	110		110	-
Provider Services - Extra Care	500	-	500	-
Sheltered Housing	938		938	-
Capital investment in Garden Centre	159		159	-
ADULT SOCIAL CARE AND HEALTH	1,707	-	1,707	-
Bereavement Services	1,000	520	1,775	775
Finance and HR system	500		500	-
ICT	8,955	320	6,955	(2,000)
People ICT	3,000	335	3,000	-
ASSISTANT CHIEF EXECUTIVE	13,455	1,175	12,230	(1,225)
Education – Fire Safety Works	902		902	-
Education - Fixed Term Expansions	3,243	28	550	(2,693)
Education - Major Maintenance	9,549	485	4,049	(5,500)
Education - Miscellaneous	-	125	134	134
Education - Permanent Expansion	44	22	319	275
Education - Secondary Estate	-	41	41	41
Education - SEN	2,226	188	1,026	(1,200)
CHILDREN, YOUNG PEOPLE AND EDUCATION	15,964	889	7,021	(8,943)
Allotments	200	177	200	-
Fixtures & Fittings FFH	-	571	571	571
Capitalised Feasibility Fund	330		330	-
Growth Zone	4,000	(19)	4,000	-
Grounds Maintenance Insourced Equipment	200		200	-
Highways - maintenance programme	8,618	1,376	13,290	4,672
Highways – flood water management	435	175	895	460
Highways - bridges and highways structures	3,403	1,102	3,403	-
Highways - Tree works	56	35	56	-
Mitigate unauthorised access to parks and open spaces	73		73	-
Leisure Equipment Upgrade	70	56	206	136
Libraries Investment - General	1,614	106	300	(1,314)
Libraries investment – South Norwood library	412		412	-
Museum Archives	75		75	-
Parking	2,141	63	2,141	-
Play Equipment	380	53	380	-

Scheme Name	Original Approved Budget 2022/2023 £'000	Actual to Date as at 31/08/22 £'000	Forecast for year end 2022/2023 £'000	Variance to Date 2022/2023 £'000
Safety - digital upgrade of CCTV	1,539		1,539	-
Section 106 Schemes	-	3	3	3
Signage	137		274	137
South Norwood Good Growth	1,032	(339)	1,208	176
Kenley Good Growth	425	292	760	335
Sustainability Programme	565		565	-
TFL - LIP	9,266	(238)	4,326	(4,940)
Unsuitable Housing Fund	-	60	61	61
Waste and Recycling Investment	1,000		1,000	-
Waste and Recycling - Don't Mess with Croydon	1,000	6	1,000	-
SUSTAINABLE COMMUNITIES, REGEN & ECONOMIC DVLPT	36,971	3,479	37,268	297
Asset Strategy - Stubbs Mead	700		300	(400)
Asset Strategy Programme	225		225	-
Asset Acquisition Fund	390		250	(140)
Clocktower Chillers	412		412	-
Corporate Property Maintenance Programme	2,500	299	2,500	-
Brick by Brick programme	6,203		6,203	-
Fairfield	1,000	1,275	3,448	2,448
Fieldway Cluster (Timebridge Community Centre)	-		248	248
RESOURCES	11,430	1,574	13,586	2,156
Capitalisation Direction	25,000		25,000	-
Transformation Spend (Flexible Capital Receipts)	4,049		4,049	-
CORPORATE	29,049	-	29,049	-
TOTAL GENERAL FUND PROGRAMME	112,069	7,644	104,354	(7,715)
Asset management ICT database	-	87	155	155
Fire safety programme	-	396	396	396
Major Repairs and Improvements Programme	22,083	4,479	18,482	(3,601)
Affordable Housing	-	16		-
HOUSING REVENUE ACCOUNT	22,083	4,978	19,033	(3,050)
TOTAL CAPITAL PROGRAMME	134,152	12,622	123,387	(10,765)

REPORT TO:	CABINET 12 October 2022
SUBJECT:	Review of Council Tax Support Scheme – 2023/24
LEAD OFFICER:	Jane West – Corporate Director of Resources and Section 151 Officer Matthew Davis – Interim Director of Finance Catherine Black – Head of Payments, Revenue and Benefits
CABINET MEMBER:	Councillor Jason Cummings Cabinet Member for Finance
WARDS:	All
FINANCIAL IMPACT -	
Options set out in this report include:	
1. £650,000 reduced cost to the Council	
2. £928,000 reduced cost to the Council	
3. £972,000 reduced cost to the Council	
4. £1,251,000 reduced cost to the Council	
FORWARD PLAN KEY DECISION REFERENCE NO. Not a Key Decision	

1.	DRAFT RECOMMENDATIONS
	The Executive Mayor in Cabinet is recommended to
1.1	Approve statutory consultation on changes to the income banded Council Tax Reduction (Support) Scheme for working age claimants from 1 st April 2023 specifically consultation with the GLA, publication of a draft revised Scheme, and consultation with other persons likely to have an interest in the operation of the Scheme, as set out in this report.
1.2	Agree that the recommended changes to be consulted on are:
	<ul style="list-style-type: none"> a) Removing the application of the minimum income floor to disabled working households b) Introducing non-dependent deductions to disabled not working households c) Changing the level at which the current income bands are increased annually from CPI to the same percentage increase as Council Tax.

2. EXECUTIVE SUMMARY

- 2.1 The purpose of this report is to seek authorisation to undertake statutory consultation with both the public and the Major Precepting Authorities (the GLA) in respect of proposed changes to Croydon's Council Tax Reduction (Support) Scheme (CTS) which will take effect from 1st April 2023.
- 2.2 Each financial year the Council is required to review its CTS scheme in accordance with the requirements of schedule 1A of the Local Government Finance Act 1992 and to either maintain the scheme or amend it.
- 2.3 An income banded CTS scheme was introduced from 1st April 2022 to simplify the scheme and to achieve MTFs cost reductions of £4.3m for Croydon.
- 2.4 As at July 2022 Croydon have awarded £28.4m for the financial year of Council Tax Support to residents. This is a decrease in CTS awarded of £6.7m compared to last year, with the financial impact to Croydon being a saving of £5.4m. Compared to the MTFs estimate of £4.3m it is on track to cost £1.1m less than originally planned. This report sets out proposals to review the CTS scheme and to make changes which will impact the level of expenditure by varying amounts.
- 2.5 This report seeks authorisation to undertake the statutory consultation on proposed changes to the scheme and makes recommendation to members for the 2023/24 scheme.
- 2.6 Following the completion of the consultation the final recommendation on the scheme will be taken to Full Council in December 2022.

3. BACKGROUND

- 3.1 CTS scheme was introduced by Central Government in April 2013 as a replacement for the Council Tax Benefit scheme, administered on behalf of the Department for Work and Pensions (DWP). As part of the introduction the Government:
 - Placed the duty to create a local scheme for Working Age claimants with local authorities
 - Reduced initial funding by the equivalent of 10% from the level paid through benefit subsidy to Local Authorities under the previous Council Tax Benefit scheme
 - Prescribed that person of Pension Age would be dealt with under the existing regulations set by Central Government and not the Local Authorities local scheme
- 3.2 Since that time, funding for the CTS scheme has been absorbed into other Central Government grants paid to Local Authorities and within the Business Rates Retention regime. It is now generally accepted that it is not possible to identify the amount of funding actually provided from Central Government sources for the CTS scheme but that in real terms funding to the council has continued to reduce since 2013.

- 3.3 The current CTS scheme created by the Council is divided into two schemes, with pension age claimants receiving support under the rules prescribed by Central Government, and the scheme for working age claimants being determined solely by the local authority (subject to certain criteria).
- 3.4 Pensioners, subject to their income, can receive up to 100% support towards their Council Tax. The Council has no powers to change the level of support provided to pensioners and therefore any changes to the level of CTS can only be made to working age scheme.
- 3.5 The working age CTS scheme was changed significantly from April 2022 and moved to an income banded scheme. The complexities of the old scheme, which was based mainly on the old council tax benefit rules, were removed and a simpler scheme was introduced.
- 3.6 The principles of the existing CTS scheme (as locally adopted) for working age claimants are as follows:
- **Council Tax Support should be paid to those with minimal savings** – residents who have Capital of more than £8,000 cannot claim (excluding Pensioners or disabled not working whose limit is £16,000)
 - **Council Tax Support should be property related** – Residents can only receive Council Tax Support to a maximum of band D.
 - **Everyone should pay something** - all residents will be asked to contribute something towards Council Tax unless they are in one of the protected groups i.e., pensioner (pensioner or disabled not working).
 - **Everyone in the household should pay something** – Other adults living in a household who are not the main taxpayer, or their partner will contribute to meeting the cost of Council Tax for the property
 - **Make Work pay** – £50 income disregard for disabled working residents.
 - **Protecting the vulnerable** – Residents who are working age residents who receive Disability Living Allowance, Personal Independence Payments or Employment and Support Allowance and not working receive 100% council tax support.

3.7 Details of the current scheme:

Resident Type	Pensioners	Disabled Not Working	Disabled Working	Income Band (All other residents)
Number of Residents in Scheme	7,917	7,378	757	10,465
Amount of Capital Before Nil Entitled	No Changes to this group of Residents	£16,000	£8,000	£8,000
Council Tax Band Cap		No Band Cap	Council Tax Band: D	
Incomes received by residents not counted for the purposes of an income band / Disregarded		100% of Child Care Costs 100% of Child Maintenance 100% of Universal Credit Housing Element 50% of Carer's Allowance 100% Personal independence payments/Disability living allowance 100% child benefit		
Earned Income not counted for the purposes of an income band / Disregard		N/A	£50 per week	Nil
Non-Dependant Deductions		No non-dep deductions	£5 per week non-working £10 up to £23,999 £30 for £24,000 over	
Self-Employed Min. Income Floor		£186.41 per week for Lone Parents £297.93 per week for single claimants and couples		

Amount of capital before nil entitled: The amount of capital claimants can have before they are not entitled to claim CTS. This is set to £16,000 for claims where the claimant or partner are disabled and not working, and £8,000 for every other working age claim.

Council Tax Band Cap: For all working age claims, excluding those for disabled not working groups, the amount of council tax liability used to calculate the maximum CTS award is capped to a band D.

Incomes not counted for purposes of the income bands: These are a list of incomes that are fully ignored when calculating the income of claimants to work out how much CTS they should be awarded.

Earned income not counted for the purpose of the income bands: This is the amount of earnings we will ignore when calculating the income of claimants to work out how much CTS they should be awarded. For those classified as disabled working, we ignore the first £50 of earned income. For all other working age claims we include all of the earnings.

Non-dependant deductions: An amount deducted from the claimants CTS entitlement based on the income of any other adult living in the property, other than a partner. Deductions are taken for all working age claims other than those classed as disabled not working.

Self-employed minimum income floor: When a claimant has been self-employed for longer than a year and they declare lower than expected income, an assumed income is applied to CTS calculation for that self-employed resident.

3.8 The income bands used currently:

Weekly income	Percentage of Council Tax Liability covered by CTS		
	Disabled non-working	Lone parents with a child under 5	All other claimants
£0 to 100.99	100%	80%	75%
£101 to 150.99	100%	70%	60%
£151 to 200.99	100%	60%	40%
£201 to 250.99	100%	50%	30%
£251 to 300.99	100%	40%	20%
£301 to 350.99	100%	30%	15%
£351 to 400.99	100%	20%	10%
£401+	100%	0%	0%

4. DETAIL

4.1 Since the introduction of the change to an income banded scheme in April 2022, there have been some elements of the scheme that have been highlighted as needing review to make the scheme fairer to some of the vulnerable groups of residents. i.e., removing the application of the minimum income floor to self-employed disabled working residents.

- 4.2 There is also a decision to be made regarding the level at which the income bands are increased each year. The unprecedented monthly increase in CPI means that the part of the scheme which links the increase in income bands to the level of CPI as of September needs to be reviewed.
- 4.3 Given the original intention that everyone in the household should contribute to the cost of Council tax there is an option to introduce non-dependant deduction to disabled not working households, either at the same rate as other groups, or at a reduced rate.

Option to amend the Income banded scheme for consultation

- 4.4 In view of some areas that have been identified as needing review, it is recommended to consult on changing some elements of the existing scheme.
- 4.5 The final details of any changes to the scheme will need to take account of the outcome of public consultation. Cabinet is asked to agree the following principles for the changes to the existing scheme as the basis for public consultation: -
- Remove the application of the minimum income floor to households where the claimant or partner are disabled.
 - Change the rate at which the income bands are increased annually from the level of CPI (currently 9.4%) to the amount Council Tax is increased for that year – modelled for indicative purposes on 3%.
 - Introduce non-dependent deductions (NDD) to disabled not working households, except where the non-dependent is in receipt of Employment Support Allowance or Limited Capability to Work.
- 4.6 **Removal of minimum income floor** – This will positively affect households that have been classified as disabled working, and where the claimant or partner are self-employed and their income isn't disregarded already under permitted earnings. This change is proposed to acknowledge that where the person who is disabled is self-employed, or their partner, there may be reasons as to why they are unable to increase their hours or income, and as a result we should not use assumed income that may be unachievable in their circumstances.
- An example of how this would effect a claim: Claimant is self-employed as a hairdresser and their income is £80 per week after expenses. If we applied the minimum income floor we would use assumed income of £297.93 per week. If they had no other income the level of CTS they would get in each circumstance is very different. They would be awarded 20% of their CTS if we used the assumed income figure, but 75% if we used the £80 actual income.
- 4.7 **CPI change** – This change will affect all claimants equally. The proposal is to increase the income bands used within the scheme by the same percentage that we increase Council Tax. This won't be a set percentage but rather the scheme will state that the income bands will increase by how much London Borough of Croydon increases council tax each year. We will then not need to consult on this each year.

4.8 The current scheme states that the 50% band which is at £201.00 as of the 1st April 2022 will increase based on the Consumer Price Index as September of the preceding year. The bands must then continue to move at £50 intervals As of June 2022 CPI has risen by 9.4% in the last 12 months. The updated bands based on this increase would be as follows:

Weekly income	Percentage of Council Tax Liability covered by CTS		
	Pensioners and disabled non-working	Lone parents with a child under 5	All other claimants
£0 to £119.99	100%	80%	75%
£120 to £169.99	100%	70%	60%
£170 to £219.99	100%	60%	40%
£220 to £269.99	100%	50%	30%
£270 to £319.99	100%	40%	20%
£320 to £369.99	100%	30%	15%
£370 to £419.99	100%	20%	10%
£420+	100%	0%	0%

4.9 The proposal is to change the scheme to increase the income bands by the percentage by which Council Tax is increased, this is currently 3%. If the scheme was changed in the income bands would be increased to the following amounts:

Weekly income	Percentage of Council Tax Liability covered by CTS		
	Pensioners and disabled non-working	Lone parents with a child under 5	All other claimants
£0 to £106.99	100%	80%	75%
£107 to £156.99	100%	70%	60%
£157 to £206.99	100%	60%	40%
£207 to £256.99	100%	50%	30%
£257 to £306.99	100%	40%	20%
£307 to £356.99	100%	30%	15%
£357 to £406.99	100%	20%	10%
£407+	100%	0%	0%

4.10 **Non-dependent deductions** - One of the principles of the CTS scheme is that everyone in the household should pay towards council tax. Non-dependents are other adults that live in the property, excluding any partners. In all other groups within the scheme a deduction is taken from the level of CTS entitlement based on the non-dependents income. To implement the 'everyone in the household should pay' principle across all residents we are proposing to introduce non-dependent deductions to disabled not working claims. The rate of the weekly deductions are £5 if the non-dependent is not working, £10 if earning up to £23,999 and £30 if earning £24,000 or over.

4.11 Consideration has been given to changing the non-dependent deductions from set amounts to a percentage of council tax liability. In practice the way the processing system is set up means that it is unable to tie the deductions directly to the liability amount and having a set figure means we can update the amount once a year and all claims will be updated. Changing the deductions to a percentage of council tax would mean that a non-dependent in a band A property would be paying much less than a non-dependent in a band D property, even if they had the same level of income which would make the scheme complex and unfair. The deduction should be based on the income of the non-dependent and not the property situation.

Disabled not working claim if non-dependent deductions were introduced as a percentage of council tax liability (assumed a 20% deduction):

Band A property

Non-dependent income £15,000 – deduction set at 20% of weekly liability

Deduction would be 20% of £25.21 = £5.04

Band D property

Non-dependent income £15,000 – deduction set at 20% of weekly liability

Deduction would be 20% of £37.80 = £7.56

This methodology is therefore not recommended.

Instead, we are proposing to add to the scheme that the level of the cash deduction is increased annually by the same percentage that the non-dependent deductions are increased for Housing Benefit. The increased figure would be updated in the system in one place and all the claims would be updated. All figures are reviewed annually and this will form part of that process.

- 4.12 An example of how the proposed change will effect entitlement for disabled not working claims is as follows, based on income of £260 per week, a Band C property with liability of £33.60 per week and a non-dependent in the property who is not working:

Disabled not working claims: For disabled not working claims no matter how much their weekly income is and what income band they fall in too they will get 100% of their council tax liability covered via CTS. So they will be awarded £33.60 per week. Under the proposed changes a deduction of £5 would be taken off this award for the other adult in the property, reducing the CTS award to £28.60

Disabled working claims: For disabled working claims the total income for the claimant and their partner is added up and using the income bands the percentage of CTS award can be calculated. There is a £50 disregard for disabled working claims, meaning we would use a weekly income of £210. A weekly income of £210 would mean they fall in to the 30% CTS award income band. 30% of their weekly council tax liability of £33.60 would be £10.08.

Income banded claims: For income banded claims there are no income disregards meaning we would use the full £260 as weekly income for the claim. Weekly income of £260 equates to an award of CTS of 20% based on the income bands. 20% of £33.60 would be an award of £6.72.

	Current CTS entitlement	Entitlement after proposed changes
Disabled not working	£33.60	£28.60
Disabled working	£10.08	no change
Income band	£6.72	no change

4.13 Neighboring authorities Merton, Sutton and Bromley all take non-dependent deductions within their CTS schemes.

4.14 The table below demonstrates the financial implications of the distinct options listed above. All the scenarios below include removing the minimum income floor for disabled households.

	Scheme Impact	Saving in 2023 of £1.1m change to:
9.4% Without NDD	-£425k	£650k
3.0% Without NDD	-£146k	£928k
9.4% With NDD	-£102k	£972k
3.0% With NDD	£177k	£1,251k

4.15 All options result in a saving for Croydon, but at varying amounts depending which elements are taken forward.

4.16 The proposed changes are still designed to protect the most vulnerable residents including disabled residents not able to work.

4.17 Any income disregarded (i.e., not counted) under the current scheme will continue to be disregarded under the new scheme, e.g., Disability benefits such as Disability Living Allowance and Personal Independence Payments. Any disregards on war pensions and war disablement pensions will continue.

4.18 A hardship scheme consisting of a total £650k was already agreed for 2023/24 as part of the move to an income banded scheme in 2022/23. This amount has been ringfenced and does not affect the levels of savings proposed for 2023/24 based on the options above. The hardship scheme will continue to be administered by the Benefits team who are best placed to understand household circumstances and resident's ability to pay Council Tax.

5. CONSULTATION

5.1 These proposals would represent a change for a number of residents. It is important that residents and other stakeholder's views are considered and reflected in the final design of any changes. A full and comprehensive consultation will allow us to seek feedback and explore options and to further mitigate any negative impacts of the proposed changes CTS scheme.

Section 13A of the Local Government Act 1992 requires the Council as the billing authority to make a localised Council Tax Support scheme in accordance with section 1A of the Act. Each financial year the council must consider whether it wants to revise the scheme, leave as is or replace it. Consultation must occur on any option required to change the scheme prior to introduction, and is set out in Schedule 1A (3) of the Local Government Finance Act 1992:

Consult any major precepting authority which has power to issue a precept to it
Publish a draft scheme in such a manner as it thinks fit and
Consult such other persons as it considers are likely to have an interest in the operation of the scheme

- 5.2 When carrying out consultation the following guiding principles for a fair consultation must be adhered to:

At a time when the proposal is at a formative stage
Include sufficient reasons to enable those consulted to give consideration and respond
Awareness of the factors which are of decisive relevance to the decision
Adequate time for consideration and response

The result of the consultation should be conscientiously considered by the decision makers when the decision is made.

- 5.3 Consultation will take place with the following:

Major Precepting Authorities (the Greater London Authority) – a formal request will be made for comments on the proposed scheme. This will be in writing giving a 14-day timescale for any response. Experience from previous consultations have shown that preceptors will be focussed on the effect on the Council Tax base as well as the effect on residents.

Public – an open invitation will be given to all residents of Croydon to comment on the proposed new scheme, irrespective of whether they are in receipt of Council Tax Support or not. Both working age and pension age residents will be encouraged to respond, although it should be noted that the scheme for pension age claimants is prescribed by Central Government. If agreed the Council can only change the working age Council Tax Support scheme. An online survey will be made available via the Council's website, and a comprehensive communications plan will be delivered to ensure as much feedback as possible.

Consultation will also take place with other interested stakeholders and with equalities support organisations within the borough.

- 5.4 Approval to commence consultation by officers is proposed to enable adequate consideration of proposals resulting from the consultation by December 2022, being the year prior to the scheme being implemented.
- 5.5 In addition to formal consultation, the Council will provide information on its website as to the proposed changes.
- 5.6 If a new scheme is agreed, the Council will contact any Council Tax payer affected by the changes.

6 PRE-DECISION SCRUTINY

- 6.1 This paper sets out proposed changes to the Council Tax Support scheme with a recommendation to undertake a full public consultation on the proposals. No pre-decision scrutiny on the decision to consult has been undertaken.

7 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 7.1 The current CTS scheme costs around £28.4m of which 80% or £22.72m is borne by the Council's Collection Fund. The remaining 20% or £5.68m is attributed to the GLA.
- 7.2 The proposals to be included in the consultation deliver a saving to the Council of between £650k and £1,251k.
- 7.3 Risks – as we are asking some residents to pay more towards their Council Tax there is a risk that they may struggle to make the requested payments. To mitigate this risk, the Council will implement a hardship scheme to support those most in need or unable to pay their Council Tax. In addition to this the Council have close working partnerships with welfare agencies e.g., Citizens Advice Bureau and Money and Pension Service to further support residents in need.
- 7.4 The monetary impact of the recommendation set out in this report will be included in the budget setting and MTFs proposals 2023/24.

Approved by: Matthew Davis Interim Director of Finance Resources

8. LEGAL CONSIDERATIONS

- 8.1 The Head of Litigation and Corporate Law and Deputy Monitoring Officer comments on behalf of the Director of Legal Services and Monitoring Officer that the Council is required, under the Local Government Finance Act 1992 ('the 1992 Act'), for each financial year, to consider whether to revise or replace its CTS scheme. The Council's substantive review, detailed in this report, complies with this requirement.
- 8.2 The 1992 Act provides that a billing authority's Council Tax Reduction Scheme must include prescribed matters set out in the Council Tax Reduction Schemes

(Prescribed Requirements) (England) Regulations 2012. Therefore, the Council is required, without any exercise of discretion, to amend the CTS Scheme, to reflect any changes made to those regulations.

- 8.3 This report includes a recommendation that the revised and proposed CTS scheme be consulted upon as required by Schedule 1A of the 1992 Act.
- 8.4 When a billing authority decides to revise or replace its scheme it is required to comply with the preparation requirements set out in Schedule 1A of the 1992 Act. This includes consulting any major precepting authority, publishing the draft scheme and consulting upon it.
- 8.5 The proposed consultation is set out within section 4 of the report. Any consultation process should be conducted in accordance with the Gunning principles, as set-out at paragraph 4.2.
- 8.6 Under the 1992 Act, a decision to revise a billing authority's scheme is required to be made by the authority, not its executive. This is outlined at paragraph 2.6 of the report.

Approved by Sandra Herbert, Head of Litigation and Corporate Law and Deputy Monitoring Officer on behalf of the Director of Legal Services and Monitoring Officer.

9. HUMAN RESOURCES IMPACT

- 9.1 There are no immediate HR issues arising from this report for LBC employees or staff.

Approved by: Gillian Bevan Head of HR Resources and Assistant Chief Executives

10. EQUALITIES IMPACT -

- 10.1 An equalities impact assessment has been completed based on all the possible options presented in this report and this will be reviewed after the statutory consultation has taken place and results have been analysed. A further Equalities impact assessment will be completed at that stage when final decisions has been made.
- 10.2 The council needs to review its scheme whilst ensuring that groups more affected by the changes are provided with support.
- 10.3 The Council recognised that some people may be affected more than others. The groups listed below were identified by the Council to be affected by the proposed changes
- Self-employed disabled residents
 - Disabled non-working households with a non-dependent resident
- 10.4 It is noted that consultation will be taking place with other interested stakeholders and with equalities support organisation within the borough.
- 10.5 There are four potential outcomes of an Equality Analysis these are:

- No major change - 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.
- Adjust the proposed change to lessen the impact should it adversely impact the Council's ability to meet any of the Public Sector Duties and/or remove barriers or better promote.
- Continue the proposed change despite potential for possible adverse impact or missed opportunities to promote equality – as we are satisfied that these will not lead to unlawful discrimination and there are justified reasons to continue as planned.
- Stop and remove the change – if there will be potential for adverse effects on one or more protected groups that are not justified and cannot be mitigated it must be stopped and removed or changed.

10.6 Residents affected by the changes will be signposted to debt advisory organisations and given support with budgeting by way of mitigation.

10.7 Until full Council has made its decision around what changes will be made to the existing scheme (if any), it is not possible to confirm the final outcomes of an Equality Analysis. A further final Equality Analysis will be carried out once we are made aware of the Full Council decision in December 2022.

Approved by: Denise McCausland, Equalities Programme Manager

11. ENVIRONMENT AND CLIMATE CHANGE IMPACT

11.1 The proposed changes will not have an impact on The Council's commitment to address environmental sustainability

12. CRIME AND DISORDER REDUCTION IMPACT

12.1 No impact on Crime and Disorder.

13. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

13.1 Some changes are being proposed to amend decisions made in the original scheme such as the effect of the minimum income floor on disabled working households. Others are to further mitigate against the cost of CTS to the Council in an area where central government funding has been decreasing.

13.2 The Council is therefore recommended to agree the making the proposed changes to the CTS scheme from April 2023.

14. OPTIONS CONSIDERED AND REJECTED

14.1 The option of doing nothing is one that has been rejected as elements of the scheme such as the application of the minimum income floor need to be amended so that groups of residents are not adversely affected.

15. DATA PROTECTION IMPLICATIONS

15.1 None required. The new scheme uses only existing data held. No further personal

data will be requested, obtained, held, or published.

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

YES

Name, Address, Date of birth, National insurance number, income details, capital information and household information which may include special category data, such as ethnicity and health information

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

YES

CONTACT OFFICER: Catherine Black, Head of Payments, Revenue and Benefit.

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REPORT TO:	CABINET 12 October 2022
SUBJECT:	South London Work and Health and Job Entry Target (JET) Programme Extension/Variation
LEAD OFFICER:	Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration and Economic Recovery Heather Cheesbrough, Director of Planning and Sustainable Regeneration
CABINET MEMBER:	Councillor Jeet Bains, Cabinet Member for Planning and Regeneration.
WARDS:	All
FINANCIAL IMPACT	
<p>Additional funding of £3,502,023.36 from the Department of Work & Pensions (DWP) will be allocated to WHP and JETS as follows:</p> <ul style="list-style-type: none"> - £3,202,023.36 to WHP to extend the programme by a further twenty-three months from October 2022, meaning referrals to the programme will continue until September 2024. - £300,000 to JETS to bolster the programme and deliver more employment outcomes due to the success and overperformance of the contract to date. <p>The programme will require legal fees to initially come from Council budget, this cost will then be shared proportionally between all the five South London Partnership boroughs. (As an indication of legal expenses for the programmes, JETS legal costs to date total £7,557.50 of this total Croydon will be responsible for 42% to the value of £3,174).</p>	
<p>FORWARD PLAN KEY DECISION REFERENCE NO.: 5322EM 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.</p>	

1. For CCB

The Contracts and Commissioning Board (CCB) is requested to approve the recommendations in this report to the Mayor in Cabinet:

- 1.1 Approve a variation of the contract between the London Borough of Croydon (as Lead Accountable Body on behalf of the South London Partnership) and Reed in Partnership (“Contract”) in order to:

- a) extend the term of the Contract for the continued delivery of the South London Work and Health Programme (WHP) which also incorporates the Job Entry Targeted Support (JETS) Programme, until 30th November 2026 (referrals for WHP until September 2024 with a tail off period until 30th November 2026 and referrals for JETS until September 2022 with a tail off period until April 2023).
- b) increase the Contract value from £20,015,610 to incorporate DWP funding of £3,202,023.36 in respect of WHP and £300,000 for JETS, for a new aggregate contract value of £23,517,633.36

The Executive Mayor has the power to make the decisions set out in the recommendations below:

1.3 DRAFT RECOMMENDATIONS

The Executive Mayor, in Cabinet, is recommended to:

1.4 Approve a variation of the contract between the London Borough of Croydon (as Lead Accountable Body on behalf of the South London Partnership) and Reed in Partnership (“Contract”) in order to:

- a) extend the term of the Contract for the continued delivery of the South London Work and Health Programme (WHP) which also incorporates the Job Entry Targeted Support (JETS) Programme, until 30th November 2026. This means the referrals for WHP will continue until September 2024 with a tail off period until 30th November 2026 and referrals for JETS until September 2022 with a tail off period until April 2023.
- b) increase the Contract value from £20,015,610 to incorporate DWP funding of £3,202,023.36 in respect of WHP and £300,000 for JETS, for a new aggregate contract value of £23,517,633.36.

2. EXECUTIVE SUMMARY

- 2.1 The purpose of this report is to seek approval of the recommendation to vary the existing Contract with Reed in Partnership for the continuation of the WHP until 30th November 2026 and to increase the aggregate value of the Contract to include DWP funding of £3,202,023.36 in respect of WHP and £300,000 for the JETS Programme (the latter programme having been included via previously agreed variations to the Contract).
- 2.2 As the lead accountable body on behalf of the five South London Partnership boroughs, the Council was awarded £13,385,684 funding from DWP and the European Social Fund (ESF) to deliver the South London Work & Health Programme for 5 years from January 2018 to 2023 for a contract value of £13,385,684. Following a competitive dialogue procurement process, the contract was awarded to Reed in Partnership to deliver the WHP for an initial five-year period with two-year extension options. The content of the original award report was endorsed by the Contracts and Commissioning Board on 3rd November 2017 (Ref: CCB1285/17-18) and approved by Cabinet (ref: 2017CAB). Whilst it reflected the contract term of 5 +2 years, the award value of £13,385,684 in those reports appears to have mistakenly not take into account

the extension option. The reports should have stated a maximum contract value of £17m inclusive of the extension option. It is not clear why this error occurred. The contract award notice did however reflect the additional term and a contract value of £17m, which would have covered funding for WHP for the additional two years.

- 2.3 Since then, the Contract has been varied twice with approval from Cabinet (Refs 2620CAB; 4021CSBR). Firstly, to (respectively) incorporate the JETS programme to the value of £3.47m from Oct 2020-2021, Secondly, to include additional top up funds (£820k) for services exceeded in light of Covid and an extension to JETS for a further 1 year from October 2021 to September 2022 at a value of £2.364m. This increased the value of the Contract to £20,015,610. Both variations relied on Regulations 72 (1) (c) of the Public Contracts Regulations 2015 which permits variation due to unforeseen circumstances, in this case, the Covid pandemic.
- 2.4 This report recommends approval of the variation in order to utilise DWP funding in the sum of £3,202,023.36 for the additional referrals over 23 months from October 2022 to September 2024 in respect of WHP. The Contract provides for expiry 791 days after the last referral. This would lead to a Contract end date of 30th November 2026. Since this exceeds the permitted extension period of two years, approval is required for the additional contract term.
- 2.5 The report also recommends approval to include within the increased Contract value additional funding of £300,000 from DWP to deliver additional outcomes through the JETS programme. This will bring the total contract value to £23,517,633.36.

Detail

- 2.6 The Job Entry Targeted Support (JETS) Programme was introduced as a response to Covid-19 which had an unprecedented impact on unemployment and inequality. The JETS programme was intended to provide light touch, short term support to up to 3,520 residents from the five SLP boroughs, who had become newly unemployed as a result of Covid-19.
- 2.7 In September 2020 the contract variation to the South London Partnership (SLP) WHP contract held with Reed in Partnership was endorsed by the Contracts and Commissioning board Ref: CCB1607/20-21 and Cabinet ref: 2620CAB to accommodate a separate employment strand Work & Health Programme Job Entry: Targeted Support (WHP JETS) for a 12-month period starting in October 2020 for the value of £3,465,926.
- 2.8 Due to the demand being greater than anticipated, Reed in Partnership received an additional £3.164,000 from DWP to continue the programme for a second year on behalf of the South London Partnership for the continuation of the JETS programme A Cabinet Member variation report was approved by the Contracts and Commissioning board ref: (CCB ref: 1607/20-21) for a further 1 year from October 2021 to September 2022:, at a value of £2,364,000 as a permitted modification under the Public Contracts Regulations 2015 72 (1) c.

- 2.9 The SLP Work and Health Programme was awarded for £17m (though the Cabinet approval was for £13,385,684) jointly funded via DWP and ESF for 5 years from January 2018 to 2023 with an option to extend for a further 2 years. A modification to the contract with Reed in Partnership to include the addition of WHP JETS additional service increased the value of the contract to £20,015,610.
- 2.10 The report recommends Executive Mayor approval of £3,202,023.36 for DWP funding and an extension to South London WHP alongside an additional £300,000 DWP funding for the JETS programme.
- 2.11 The additional funding from DWP will increase the total contract value to £23,517,633.36 over the full-term contract term.
- 2.12 The variation to the contract to date as follows:

JETS		
Sep-20	Original Value	£3,465,926.00
Sep-21	Additional funding 21/22	£800,000.00
Sep-21	1 st Extension Contract Value	£2,364,000.00
Nov-22	Additional funding 22/23	£300,000.00
	Total	£6,929,926.00

WHP		
Mar-18	Original Value	£13,385,684.00 (Contract award notice £17m)
Oct-22	Extension Contract Value	£3,202,023.36
	Total	£16,587,707.36

- 2.13 The Work and Health Programme has supported 5616 residents across the five South London Partnership boroughs since the start of the Programme in March 2018, with over 1900 residents being placed into work (up to the end of July 2022). Additional funding would allow a further 1510 individuals to start the programme.
- 2.14 It will be delivered via the same Grant Funding mechanism as the core Work & Health Programme, which will form the basis of the formal agreement between DWP and each Local Growth Partnership for their responsibility for the delivery of WHP JETs. The Grant Funding will be solely from DWP and there will be no ESF funding.

Background

- 2.15 The South London Work and Health Programme is intended to support up to 5582 residents of Croydon, Merton, Kingston, Sutton, and Richmond into sustainable employment, targeting residents with disabilities and/or health conditions, the long term unemployed and specified disadvantaged groups.

- 2.16 The funding for the Programme is being derived from a £6,690,000 grant from the Department of Work & Pensions (DWP) for the initial 5-year period of the Programme. The grant value of £6,695,684 was match funded by the European Social Fund (ESF) providing a total budget of £13.385,684 for the Programme's initial 5-year period. The funding was approved due to the DWP's devolving powers and funding to London sub-regions which enables Croydon as the Lead Authority to receive the funding on behalf of the South London Partnership boroughs.
- 2.17 The programme is funded externally through grants from the Department for Work and Pensions (DWP) and the European Social Fund (ESF). The funding was approved due to DWP devolving limited authority and funding to London sub-regions which enabled Croydon as the Lead Authority to receive the funding on behalf of the South London Partnership boroughs. The DWP grant and ESF match funding provided a total budget of £13.385,6840,000 for the programme's initial 5-year period and subsequent addition funding provided to incorporate JETS and to further extend the contract with Reed In Partnership.
- 2.18 The programme has been particularly beneficial to Croydon residents with the borough having 2478 programme starts (44%) and 837 job starts (43%).

3. WORK AND HEALTH PROGRAMME

- 3.1 The South London Partnership is a sub-regional collaboration of five South London Boroughs: Croydon, Kingston, Merton, Richmond upon Thames, and Sutton. Working together and with partners, building on many years of collaborative working. SLP brings an integrated approach which adds value to what individual boroughs could achieve on their own, whilst seeking to build on the many strengths of South London as a place to live, work and thrive.
- 3.2 Croydon is the lead accountable body for the Work and Health Programme and JETS on behalf of the SLP and will be responsible for the management of the programmes.
- 3.3 The Work and Health Programme was initially introduced as a 5-year programme, providing tailored support to residents from disadvantaged backgrounds, such as people with disabilities and health conditions and the long term unemployed.
- 3.4 Along with Greater Manchester, London received devolved funding from DWP for the Work and Health Programme, which facilitated a more integrated approach, allowing residents to access relevant support services such as financial support or training and employment opportunities. This integrated approach has enabled Council services, such as Housing and Croydon Works to refer candidates to the programme, allowing them access to tailored support.
- 3.5 This integrated approach also allows us to work in partnership with external support services who have historically had a presence in the borough such as MIND and Croydon IAPT. This enables a holistic programme of support to residents and draws on the expertise of local provisions.

3.6 After an initial slow start (exacerbated by the effect of Covid - 19) the contract has seen an upturn in performance over the last year:

	Contract 100%	Croydon (42%)	Sutton (17%)	Merton (17%)	Richmond (12%)	Kingston (12%)
Referrals Actual	10687	4936	1381	1779	1317	1110
% of Total	100%	46%	13%	17%	12%	10%
Starts Actual	5616	2476	844	972	644	628
% of Total	100%	44%	15%	17%	11%	11%
Job Entry Actual	1925	839	325	325	222	200
% of Total	100%	44%	17%	17%	12%	10%
Lower Job Outcome Actual	1132	475	191	203	127	128
% of Total	100%	42%	17%	18%	11%	11%
Higher Job Outcome Actual	834	335	143	152	104	94
% of Total	100%	40%	17%	18%	12%	11%

*Figures cover the period March 2018 – July 2022

The Tables below sets out the total value of the funding for the South London Work & Health Programme and for JETS, broken down by borough, based on the expected level of benefit to each borough:

South London Work & Health Programme

	Contract 100%	Croydon (42%)	Sutton (17%)	Merton (17%)	Richmond (12%)	Kingston (12%)
Original Contract Value	£ 13,385,684	£ 5,621,987	£ 2,275,566	£ 2,275,566	£ 1,606,282	£ 1,606,282
Extension Value	£ 3,202,023	£ 1,344,850	£ 544,344	£ 544,344	£ 384,243	£ 384,243
Total Value (excluding M&A funding detailed below)	£ 16,587,707	£ 6,966,837	£ 2,819,910	£ 2,819,910	£ 1,990,525	£ 1,990,525
Management & Admin funding from ESF to cover LBC's staffing costs to Contract Manage the	£ 866,061	£ 866,061	N/A	N/A	N/A	N/A

Programme (actual costs form 17/18 – 21/22, forecast for 22/23).							
Management & Admin funding from DWP to cover LBC's staffing costs to Contract Manage the extension	£ 981,503	£ 981,503	N/A	N/A	N/A	N/A	N/A

Job Entry Targeted Support

	Contract 100%	Croydon (42%)	Sutton (17%)	Merton (17%)	Richmond (12%)	Kingston (12%)
Original Contract Value	£ 3,465,926	£ 1,455,689	£ 589,207	£ 589,207	£ 415,911	£ 415,911
Additional Funding 21/22	£ 800,000	£ 336,000	£ 136,000	£ 136,000	£ 96,000	£ 96,000
Extension Value	£ 2,364,000	£ 992,880	£ 401,880	£ 401,880	£ 283,680	£ 283,680
Additional Funding 22/23	£ 300,000	£ 126,000	£ 51,000	£ 51,000	£ 36,000	£ 36,000
Total Value	£ 6,929,926	£ 2,910,569	£ 1,178,087	£ 1,178,087	£ 831,591	£ 831,591

- 3.7 An extension would allow an additional 1510 SLP residents to receive the support of the programme.
- 3.8 The proposal presented before the Executive Mayor is to seek approval for a further variation of the contract with Reed in Partnership to increase the contract value in respect of WHP by an additional £3,202,023.36 and exercise the two-year contract extension. (Excluding JETS).
- 3.9 All management and administration costs would be utilised through the funding with only legal costs being spent from council budget.
- 3.10 It was agreed a variation to the existing contract is the most appropriate route given the strong performance from the existing contractor, Reed in Partnership. Furthermore, the short timescales set by DWP and the need to ensure uninterrupted delivery mean a new procurement would not be viable and support the delivery of the service.

4 JOB ENTRY TARGETED SUPPORT (JETS)

- 4.1 The SLWHP JETS programme was introduced for an initial period of 1 year, to respond to the impact of the Covid-19 pandemic and complement the existing WHP programme with the same core objectives.
- 4.2 The aim of the programme is to support people who have been newly unemployed and in receipt of benefits for at least 13 weeks to a year as a result of Covid-19, to find sustainable work.
- 4.3 Due to the ongoing challenges of Covid, the Programme was extended for a second year but will not be extended beyond this. However, due to

overperformance, DWP has allocated £300,000 of additional funding to deliver additional outcomes within the existing contract period.

In broad principles the SLWHP JETS has:

- Provided a light touch provision that includes, but is not limited to, transferable skills analysis, CV writing, job search support, interview skills, self-efficacy, and confidence building.
- Been delivered and managed separately from the core WHP programme.

4.4 To date JETS has seen 6167 residents start the programme with 2225 placed into employment.

4.5 The second year of JETS has seen job entry sustainment's reach 204% against profile.

4.6 Programme starts for the second year reached the contracted target of 2400 at the beginning of August 7 weeks ahead of schedule. This has caused us to reach the funding ceiling much earlier than anticipated for the second consecutive year.

4.7 An extra £300,000 of funding has been provisionally confirmed (subject to DWP governance) by the DWP to allow the programme to support an additional 412 people into employment.

5. CONSULTATION

5.1 All South London Partnership boroughs have been consulted in regard to additional funding for an extension to the Work and Health Programme and agreement in principle was obtained from all SLP Growth Directors, prior to DWP confirming allocations and volumes. Since DWP confirmed the allocation, a further update was provided to the Growth Directors at their meeting on 12th September 2022. [Formal written approval shall also be sought prior to implementing the extension]. Further updates will be provided as and when necessary, at scheduled monthly meetings.

5.2 Each of the five South London boroughs nominated Lead Officers have been involved and contributed to this process throughout.

5.3 Wider Work and Health Programme sub regions (including Central London Forward and West London Alliance) have been consulted in regard to their plans for a WHP extension and all are in agreement in regard to varying their contracts.

6 PRE-DECISION SCRUTINY

6.1 This item has not been to scrutiny meeting for a pre-decision due to the urgent measures needed to ensure the programme can continue with the additional funding.

7 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

7.1 Revenue and Capital consequences of report recommendations

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2022/23	2023/24	2024/25	2025/26
	£'000	£'000	£'000	£'000
Revenue Budget available				
Expenditure	4,575,000	0	0	0
Income	(4,575,000)	0	0	0
Effect of decision from report				
Expenditure	£523,984	£1,102,569	£1,326,553	£503,175
Income	£523,984	£1,102,569	£1,326,553	£503,175
M&A Funding	£236,676	£ 248,276	£ 244,409	£244,409
Legal Costs*	£ 7,558			
Remaining budget	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Capital Budget available				
Expenditure	0	0	0	0
Effect of decision from report				
Expenditure	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Remaining budget	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

*Legal costs are an estimate based on JETS legal costs to date.

The effect of the decision

The effect of the decision is the Council will commit to spending an additional £3,202,023.36 on the Work and Health Programme for a twenty-three month extension and allowing 1510 more SLP residents to start the programme. The Council will also commit to spending an additional £300,000 on the JETS programme to support an additional 412 SLP residents into employment. All additional spend will be paid to the Council in the form of grant funding from the DWP. A small cost will be shared between the five SLP boroughs for any legal costs involved during the programme which will be contained within other Economic Development Budgets. (As an indication of legal expenses for the programmes, JETS legal costs to date total £7,557.50, of this total Croydon will be responsible for 42% to the value of £3,174).

Risks

This is set out in Part B of the report as it includes legal professional privilege information

7.3 Options

The following alternative options were considered and rejected due to the negative impact on performance and support available to residents.

The option of re-procuring was considered but due to the short-term nature of the extension it was felt that there would be minimal interest from the market given the length of time and investment that would be required from a new provider. Additionally, the adjustment time that a new provider would need, would lead to a dramatic drop off in performance, meaning the required number of employment outcomes would not be achieved within the necessary timeframe. Furthermore, a re-procurement would lead to a break in delivery, which would adversely affect vulnerable residents in need of support and would contravene DWP's stipulation that there should be no break in delivery.

The option of rejecting the opportunity of additional funding was considered but would result in a lack of support for SLP residents.

7.4 Future savings/efficiencies

This extended provision of support will maximise employment opportunities for local residents and support the Council in delivering value for money in performance, delivery, and cost.

The Work and Health Programme allocated 30% in value £981,503 of additional funding to cover costs in relation to management and administration, this could be used to support procurement expenses as staff costs were covered through the original funding.

As the expenditure will be covered from DWP grant funding, there are no saving opportunities. A small cost will be shared between the five SLP boroughs for any legal costs involved during the programme.

Approved by: Darrell Jones, Acting Head of Finance – Sustainable Communities, Regeneration & Economic Recovery 31st August 2022.

8. LEGAL CONSIDERATIONS

- 8.1 The Head of Commercial & Property Law comments on behalf of the Director of Legal Services & Monitoring Officer as follows:
- 8.2 The Council may enter into contracts and variations of contracts under the general power of competence (Localism Act 2011), which gives local authorities the power to do anything that individuals generally may do.
- 8.3 The Executive Mayor has the power to exercise executive functions pursuant to s9E of the Local Government Act 2000.
- 8.4 The original Cabinet award report should have included the full value of the permitted extension (plus 2 years) of the WHP programme i.e. £17m. It is understood that this omission appears to have been a mistake. Although the original Cabinet award report omitted the extension value, the contract award notice and the contract covered the 5+2 years and the full value for WHP.

Therefore, the recommendation to extend WHP contract value by £3,202,023.36 is not a variation within the Public Contracts Regulations 2015.

- 8.5 The Council must comply with the Public Contracts Regulations 2015 (PCR). Regulation 72 of the PCR sets out a number of 'safe harbours' which can be used to modify a contract during its term. As stated above, the previous variations were made pursuant to Regulation 72 (1) (c) which permits variation due to unforeseen circumstances. For these variations, the Council is required to publish modification notices.
- 8.5 This report recommends a further variation to JETS to include additional funding of £300k. This can be considered to be a non-substantial variation pursuant to Regulation 72(1)(e) as it does not meet any of the criteria of a substantial variation contained within 72(8) of the PCR. In order to rely on this provision, the value of the modification does not need to be aggregated with previous modifications and no notice is required.
- 8.6 The Council is under a general Duty of Best Value to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness (Section 3 of the Local Government Act 1999 (as amended by s137 of the Local Government & Public Involvement in Health Act 2007)).

Approved by Kiri Bailey, Head of Commercial and Property Law, on behalf of the Director of Legal Services & Monitoring Officer.

9. HUMAN RESOURCES IMPACT

- 9.1 The original funding for WHP allocated 10% of total funding towards funding management and admin costs in relation to management of the programme.
- 9.2 Agreement has been given for local administration costs equating to 23% of the total funding to be allocated towards funding the management and administration of the programme. Any staff employed to oversee the programme will be a council employee on a fixed term contract.
- 9.3 There will be an HR impact in regard to this report, in terms of when any staff member's fixed term contract comes to an end. The post holder may be entitled to a redundancy payment and redeployment.
- 9.4 If any other issues arise these will be managed under the Council's policies and procedures.

Approved by Jennifer Sankar, Head of HR for Sustainable Communities, Regeneration and Economic Recovery, for and on behalf of Dean Shoemith, Chief People Officer. August 2022

10. EQUALITIES IMPACT

- 10.1 The council has an obligation under the public sector equality duty, which is to eliminate unlawful discrimination, to advance equality of opportunity and to build better relationships between groups with protected characteristics.
- 10.2 An equality analysis was completed in August 2020 as part of the initial contract variation and was signed off by the Equalities Manager.
- 10.3 The outcome is no major change; 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.

Approved by Gavin Handford, Director of Policy, Programmes & Performance

11. ENVIRONMENT AND CLIMATE CHANGE IMPACT

- 11.1 With the original contract, Reed in Partnership was required to create, submit and maintain a Sustainable Development implementation plan. The plan covers various areas such as minimising waste, energy efficiency, reducing transportation/travel and staff awareness training. That plan applies to this strand.

12. CRIME AND DISORDER REDUCTION IMPACT

- 12.1 There are no adverse Crime and Disorder impacts arising from this report. The expected increase in number of residents becoming employed will have a positive impact across the boroughs potentially reducing crime and disorder within the borough.

13. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 13.1 The success of both the Work and Health Programme and JETS has highlighted the demand for this type of support, by continuing extending these programmes we would be able to support the London recovery mission of 'good work for all'.
- 13.2 The original WHP funding was aimed at supporting 2510 SLP residents into employment. By increasing the funding, we will be able to increase the number of residents who are supported into employment.

14. OPTIONS CONSIDERED AND REJECTED

- 14.1 Two further options were considered.

Option One: Procure a new provider – this was not a viable option as the programme is well established and the current provider has integrated the programme into the South London area, focusing on a locality approach that

would take at least 18 months to replicate. A change in the provider would be at the detriment to the participants of the programme.

Option Two: Do not extend the programme – this would leave a gap in employment support for those participants who were further away from employment and therefore not acceptable.

These options were deemed not acceptable and rejected. This has been done with extensive consultation with legal and procurement colleagues and other Work & Health Contract Managers across London.

15. DATA PROTECTION IMPLICATIONS

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

YES - Any data shared between Reed in Partnership, the Council and SLP is anonymised and therefore does not include any personal data.

This is a contract variation and the contractor processes personal data. There is existing detailed governance and approved protocols around GDPR.

Reed in Partnership have confirmed the same protocols will apply.

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

YES

A DPIA assessment was completed when the programme was initiated.

(Approved by Heather Cheesbrough, Director of Planning & Sustainable Regeneration)

CONTACT OFFICER: Gurvinder Doal, JETS Project Manager
Kate Apted, Work and Health Programme Manager

APPENDICES TO THIS REPORT – CABINET REPORTS



Cabinet Report WHP
JETS_Sep 20.pdf



Cabinet Report -
WHP JETS_Sep 21.pdf



South London Work
and Health Programr

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