



HILLINGDON  
LONDON



# CABINET

## To all Members of the Cabinet:

**Date:** THURSDAY, 14 OCTOBER  
2021

**Time:** 7.00 PM

**Venue:** COMMITTEE ROOM 6 -  
CIVIC CENTRE, HIGH  
STREET, UXBRIDGE

**Meeting  
Details:** Members of the Public and  
Media are welcome to attend  
this meeting and observe the  
public business discussed.

This meeting will also be  
broadcast live on the  
Council's YouTube Channel.

You can view the agenda  
at [www.hillingdon.gov.uk](http://www.hillingdon.gov.uk) or use a smart  
phone camera and scan the code below:



Ian Edwards, Leader of the Council  
(Chairman)

Jonathan Bianco, Deputy Leader of the  
Council & Cabinet Member for Property &  
Infrastructure (Vice-Chairman)

Douglas Mills, Cabinet Member for  
Corporate Services & Transformation

Martin Goddard, Cabinet Member for  
Finance

Susan O'Brien, Cabinet Member for  
Families, Education and Wellbeing

Jane Palmer, Cabinet Member for Health  
& Social Care

Eddie Lavery, Cabinet Member for  
Environment, Housing & Regeneration

John Riley, Cabinet Member for Public  
Safety and Transport

## Published:

Wednesday, 6 October 2021

## Contact:

Mark Braddock

Tel: 01895 250470

Email: [mbraddock@hillingsdon.gov.uk](mailto:mbraddock@hillingsdon.gov.uk)

Putting our residents first

Lloyd White  
Head of Democratic Services  
London Borough of Hillingdon,  
Phase II, Civic Centre, High Street, Uxbridge, UB8 1UW

# Useful information for residents and visitors

## *Watching & recording this meeting*

You can watch the public part of this meeting on the Council's YouTube channel, live or archived after the meeting. Residents and the media are also welcome to attend in person, and if they wish, report on the public part of the meeting. Any individual or organisation may record or film proceedings as long as it does not disrupt proceedings.

Watch a **LIVE** broadcast of this meeting on the Council's YouTube Channel: *Hillingdon London*

Those attending should be aware that the Council will film and record proceedings for both official record and resident digital engagement in democracy.



It is recommended to give advance notice of filming to ensure any particular requirements can be met. The Council will provide seating areas for residents/public, high speed WiFi access to all attending and an area for the media to report. The officer shown on the front of this agenda should be contacted for further information and will be available to assist. When present in the room, silent mode should be enabled for all mobile devices.

## *Travel and parking*

Bus routes 427, U1, U3, U4 and U7 all stop at the Civic Centre. Uxbridge underground station, with the Piccadilly and Metropolitan lines, is a short walk away. Limited parking is available at the Civic Centre. For details on availability and how to book a parking space, please contact Democratic Services.

Please enter via main reception and visit the security desk to sign-in and collect a visitors pass. You will then be directed to the Committee Room.

## *Accessibility*

For accessibility options regarding this agenda please contact Democratic Services. For those hard of hearing an Induction Loop System is available for use.

## *Emergency procedures*

If there is a FIRE, you will hear a continuous alarm. Please follow the signs to the nearest FIRE EXIT and assemble on the Civic Centre forecourt.

Lifts must not be used unless instructed by a Fire Marshal or Security Officer. In the event of a SECURITY INCIDENT, follow instructions issued via the tannoy, a Fire Marshal or a Security Officer. Those unable to evacuate using the stairs, should make their way to the signed refuge locations.



# Notice

## **Notice of meeting and any private business**

The London Borough of Hillingdon is a modern, transparent Council and through effective Cabinet governance, it seeks to ensure the decisions it takes are done so in public as far as possible. Much of the business on the agenda for this Cabinet meeting will be open to residents, the wider public and media to attend. However, there will be some business to be considered that contains, for example, confidential, commercially sensitive or personal information. Such business is shown in Part 2 of the agenda and is considered in private. Further information on why this is the case can be sought from Democratic Services.

This is formal notice under The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 to confirm that the Cabinet meeting to be held on:

*14 October 2021 at 7pm in Committee Room 6, Civic Centre, Uxbridge*

will be held partly in private and that 28 clear days public notice of this meeting has been given. The reason for this is because the private (Part 2) reports listed on the agenda for the meeting will contain exempt information under Part 1 of Schedule 12A to the Local Government Act 1972 (as amended) and that the public interest in withholding the information outweighs the public interest in disclosing it. An online and a hard copy notice at the Civic Centre in Uxbridge indicates a number associated with each report with the reason why a particular decision will be taken in private under the categories set out below:

- (1) information relating to any individual
- (2) information which is likely to reveal the identity of an individual
- (3) information relating to the financial or business affairs of any particular person (including the authority holding that information)
- (4) information relating to any consultations or negotiations, or contemplated consultations or negotiations, in connection with any labour relations matter arising between the authority or a Minister of the Crown and employees of, or office holders under, the authority.
- (5) Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.
- (6) Information which reveals that the authority proposes (a) to give under any enactment a notice under or by virtue of which requirements are imposed on a person; or (b) to make an order or direction under any enactment.
- (7) Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

## **Notice of any urgent business**

To ensure greater transparency in decision-making, 28 clear days public notice of the decisions to be made both in public and private has been given for these agenda items. Any exceptions to this rule are the urgent business items on the agenda marked \*. For such items it was impracticable to give sufficient notice for a variety of business and service reasons. The Chairman of the relevant Select Committee has been notified in writing about such urgent business.

## **Notice of any representations received**

No representations from the public have been received regarding this meeting.

## **Date notice issued and of agenda publication**

6 October 2021  
London Borough of Hillingdon

# Agenda

- 1 Apologies for Absence
- 2 Declarations of Interest in matters before this meeting
- 3 To approve the minutes of the last Cabinet meeting 1 - 12
- 4 To confirm that the items of business marked Part 1 will be considered in public and that the items of business marked Part 2 in private

## **Cabinet Reports - Part 1 (Public)**

- 5 Report from the External Services Select Committee on Children's Dental Health (Cllr Jane Palmer & Cllr Susan O'Brien) 13 - 40
- 6 Statement of Community Involvement (Cllr Eddie Lavery) 41 - 118
- 7 London Borough of Hillingdon Enforcement Policy (Cllr John Riley) 119 - 138
- 8 Consultation on changes to school admissions arrangements (Cllr Susan O'Brien) 139 - 166
- 9 Procurement of Temporary Accommodation Placements Utilising a Dynamic Purchasing System (Cllr Eddie Lavery) 167 - 172
- 10 Appropriation of land at the former Yiewsley Swimming Pool and Falling Lane, Yiewsley (Cllr Jonathan Bianco) 173 - 182
- 11 Transport for London, Local Implementation Plan, 2022/23 Delivery Programme (Cllr John Riley) 183 - 188
- 12 The Annual Report of Adult and Child Safeguarding Arrangements (Cllr Jane Palmer) 189 - 242
- 13 Monthly Council Budget Monitoring Report: Month 5 (Cllr Martin Goddard) 243 - 266

## **Cabinet Reports - Part 2 (Private and Not for Publication)**

- |           |   |           |
|-----------|---|-----------|
| <b>14</b> | Contract for the provision of Pesticide Analysis, Radiation Testing, Bacterial Testing (Cllr John Riley)                      | 267 - 276 |
| <b>15</b> | Software Support and Maintenance for the HR and Payroll system (Cllr Douglas Mills)   | 277 - 282 |
| <b>16</b> | Street Lighting Term Contract Extension (Cllr John Riley)   | 283 - 292 |
| <b>17</b> | Voluntary Sector Lease - Wren Centre, Queens Walk, Ruislip (Cllr Jonathan Bianco)   | 293 - 300 |
| <b>18</b> | St Andrew's Park, Uxbridge - Theatre and Former Cinema Building Transfer Notices (Cllr Jonathan Bianco & Cllr Eddie Lavery) * | ---       |

### ***REPORT TO FOLLOW ON AGENDA B***

*The reports in Part 2 of this agenda are not for publication because they involve the disclosure of information in accordance with Section 100(A) and Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended), in that they contain exempt information and that the public interest in withholding the information outweighs the public interest in disclosing it.*

- 19** Any other items the Chairman agrees are relevant or urgent

*\*denote urgent business not on the Forward Plan*

This page is intentionally left blank

## Minutes

### CABINET

Thursday, 2 September 2021

Meeting held at Committee Room 6 - Civic Centre,  
High Street, Uxbridge



Decisions published on: 3 September 2021

Decisions come into effect on: 5pm, Friday 10 September 2021

#### **Cabinet Members Present:**

Ian Edwards (Chairman)

Douglas Mills

Martin Goddard

Susan O'Brien

Jane Palmer

Eddie Lavery

John Riley

#### **Members also Present:**

Duncan Flynn (Attendee of the Cabinet meeting as Chief Whip - non-voting)

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

Apologies were received from Councillor Jonathan Bianco.

#### **2. DECLARATIONS OF INTEREST IN MATTERS BEFORE THIS MEETING**

No interests were declared by Members present.

#### **3. TO APPROVE THE MINUTES OF THE LAST CABINET MEETING**

The decisions and minutes of the Cabinet meeting held on 8 July 2021 were agreed as a correct record.

#### **4. TO CONFIRM THAT THE ITEMS OF BUSINESS MARKED PART 1 WILL BE CONSIDERED IN PUBLIC AND THAT THE ITEMS OF BUSINESS MARKED PART 2 IN PRIVATE**

This was confirmed.

## 5. HILLINGDON DIGITAL CONNECTIVITY STRATEGY

### RESOLVED:

**That the Cabinet approves the London Borough of Hillingdon's Digital Connectivity Strategy.**

### Reasons for decision

Cabinet approved a Digital Connectivity Strategy to ensure that the Council would continue to be 'investor ready' and make maximum use of what is available in digital technologies and infrastructure improvements to support residents and local businesses into the future.

The Cabinet Member for Corporate Services & Transformation expressed the importance of investment across the whole Borough and the Council's ability to have open discussions with the private sector about what is expected. He welcomed the opportunity for the Council itself to also take advantage of these changes for its own service delivery to residents.

The Leader of the Council considered good digital connectivity an essential part of a successful borough and its economic growth going forward.

### Alternative options considered and rejected

None.

<b>Relevant Select Committee</b>	Corporate, Finance & Property
<b>Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)</b>	5pm, Friday 10 September 2021
<b>Officer(s) to action</b>	Helen Vincent / Sajad Rashid / Perry Scott
<b>Directorate</b>	Infrastructure, Transport & Building Services
<b>Classification</b>	<b>Public</b>
	<i>The report and any background papers relating to this decision by the Cabinet are available to view on the Council's website or by visiting the Civic Centre, Uxbridge.</i>



**6. CONSIDERATION OF SETTING A LICENSED DEFICIT BUDGET IN 2021/22 FOR THREE SCHOOLS IN THE BOROUGH**

**RESOLVED:**

**That Cabinet:**

- 1. Approves the application for a licensed deficit from Bishop Winnington-Ingram CE Primary School for 2021/22.**
- 2. Approves the application for a licensed deficit from Holy Trinity CE Primary School for 2021/22.**
- 3. Approves the application for a licensed deficit from Oak Wood School for 2021/22.**

**Reasons for decision**

Cabinet gave its approval for three schools in the Borough to hold a licensed deficit, noting that this would enable the schools to function with the certainty of funding, whilst they would also take reasonable steps to manage their costs.

The Cabinet Member for Families, Education & Wellbeing noted the positive movement from the previous year, where there had been five schools that had set a deficit budget. The Cabinet Member paid thanks to Council finance officers who had worked closely with schools on their financial plans.

**Alternative options considered and rejected**

Cabinet could have decided to write-off the deficit, which would have required agreement from the Schools Forum, or alternatively withdrawn the governors delegated powers over their budgets.

<b>Relevant Select Committee</b>	Families, Health & Wellbeing
<b>Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)</b>	5pm, Friday 10 September 2021
<b>Officer(s) to action</b>	Graham Young
<b>Directorate</b>	Finance
<b>Classification</b>	<b>Public</b>
	<i>The report and any background papers relating to this decision by the Cabinet are available to view on the Council's website or by visiting the Civic Centre, Uxbridge.</i>

## **7. MONTHLY COUNCIL BUDGET MONITORING REPORT: MONTH 3**

### **RESOLVED:**

#### **That the Cabinet:**

- 1. Note the budget monitoring position and treasury management update as at June 2021 (Month 3) as outlined in Part A of this report.**
- 2. Approve the financial recommendations set out in Part B of this report**
  - a. Note those consultancy and agency assignments over £50k approved under delegated authority between the July 2021 and September 2021 Cabinet meetings, detailed at Appendix A.**
  - b. Approve forward phasing of future years' funding of £2,920k allocated to Electrical Fire Safety within the Works to Stock programme into 2021/22 to accelerate electrical fire safety works into this year.**
  - c. Approve a virement of £24,826k from the 2021/22 Acquisition and Developments Budget to the following schemes: Hayes Estate Regeneration £3,743k, Hayes Estate Leaseholder Buy Backs £16,783k, Packet Boat House Buy Backs £2,300k, Loft Extensions £2,000k.**
  - d. Agree to allocate £13,291k of specific contingency budgets held centrally and reported under Development and Risk Contingency into the base budgets within specific Services Operating Budgets, so that these budgets reflect the full budgeted cost of operating these services.**
  - e. Agrees a proposed update to the Council's Fees & Charges schedule relating to the tipping of DIY waste at the New Years Green Lane Civic Amenity Site as set out in Appendix B.**

#### **Reasons for decision**

Cabinet was informed of the forecast revenue, capital and treasury position for the current year 2021/22 to ensure the Council achieved its budgetary and service objectives.

The Cabinet Member for Finance outlined the projected balances at the end of the financial year which had remained consistent. He also updated Cabinet on the exceptional pressures due to Covid-19 which had now totalled in excess of £50m, but welcomed that this was covered by both Government funding, and if necessary, the Council's own earmarked reserves.

The Cabinet Member updated Cabinet on the Council's savings programme which whilst generally on target had been impacted by Covid-related delays in achieving income. On the capital programme, a projected overspend was noted on the planned Yiewsely and West Drayton leisure centre where the Council was looking to mitigate the cost increases to progress the project.

Turning to the schools budget, the Cabinet Member noted the financial pressures from the unprecedented increase in demand for special educational needs provision and use of out of borough provision, but it was welcomed that work was underway to create additional places in the Borough to counteract this.

On the housing budget, it was noted that it would be geared towards the Council's priorities of increasing the housing stock and regeneration schemes.

Other financial recommendations approved by the Cabinet included re-phasing of various capital budgets and the allocation of specific contingency funds into service budgets, the amount of which was amended at the meeting. Furthermore, Cabinet ratified an update to the Council's fees and charges with respect to the tipping of DIY waste.

### Alternative options considered and rejected

None.

<b>Relevant Select Committee</b>	Corporate, Finance & Property
<b>Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)</b>	The financial decisions made by Cabinet shown above as 2 b,c,d & e can be called-in by 5pm, Friday 10 September 2021. The other decisions made are to 'note' which cannot be called in.
<b>Officer(s) to action</b>	Paul Whaymand
<b>Directorate</b>	Finance
<b>Classification</b>	<b>Public</b>
	<i>The report and any background papers relating to this decision by the Cabinet are available to view on the Council's website or by visiting the Civic Centre, Uxbridge.</i>

## 8. SCHOOL CAPITAL PROGRAMME UPDATE

### RESOLVED:

#### That Cabinet:

1. Note the progress made with primary and secondary school expansions, the school condition programme and other school capital projects.
2. Delegates full authority to the appropriate Cabinet Members, in consultation with the Corporate Director of Infrastructure, Transport & Building Services, to make all necessary procurement and financial decisions, including the appointment of consultancies and the placing of building contracts for School Condition Programme.

#### Reasons for decision

Cabinet received an update on the Council's school expansion programme and also the school condition programme, improving the fabric of local schools. Cabinet agreed to delegate authority to progress the school condition programme.

The Cabinet Member for Families, Education & Wellbeing noted the success of the schools expansion programme to-date which had enabled the Council to meet its statutory requirements to provide sufficient school places. The latest pupil projections were noted and to meet this, the Cabinet Member updated Cabinet on the secondary school expansion projects, along with other expansion plans at local special educational needs schools.

#### Alternative options considered and rejected

None.

<b>Relevant Select Committee</b>	Families, Health & Wellbeing
<b>Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)</b>	Decision no.2 above can be called in by 5pm, Friday 10 September 2021. Decision no.1 above cannot be called in as it was to 'note'.
<b>Officer(s) to action</b>	Bobby Finch / Michael Naughton
<b>Directorate</b>	Infrastructure, Transport & Building Services
<b>Classification</b>	<b>Public</b>
	<i>The report and any background papers relating to this decision by the Cabinet are available to view on the Council's website or by visiting the Civic Centre, Uxbridge.</i>

## 9. POSTAL SERVICES CONTRACT

### RESOLVED:

That the Cabinet:

1. Accept the tender from The Royal Mail Group Limited for the Crown Commercial Services (CCS) Framework for Postal Goods and Services Solutions (RM6017) Lot 3 - Collection and delivery of letters, large letters and parcels for the London Borough of Hillingdon for a three-year period from September 2021.
2. Furthermore, agree that this includes the provision to extend the contract for a two-year period, (five years in total), subject to Cabinet Member approval.

### Reasons for decision

Cabinet approved a contract for postal services for the next 3 years, with an option to extend it to 5 years and noted that the proposed contract would also align with the Council's digital transformation plans.

### Alternative options considered and rejected

Cabinet could have agreed to continue arrangements outside the framework but determined this would not provide value for money.

<b>Relevant Select Committee</b>	Corporate, Finance & Property
<b>Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)</b>	5pm, Friday 10 September 2021
<b>Officer(s) to action</b>	Sean Stone
<b>Directorate</b>	Infrastructure, Transport & Building Services
<b>Classification</b>	<b>Private</b>  <i>Whilst the Cabinet's decisions above are always made public, the officer report relating to this matter is not because it was considered in the private part of the meeting and contained information relating to the financial or business affairs of any particular person (including the Authority holding that information) and the public interest in withholding the information outweighed the public interest in disclosing it in accordance with Section 100(A) and paragraph 3 of Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended).</i>

10. GREAT CENTRAL HOUSE, SOUTH RUISLIP

**RESOLVED:**

**That the Cabinet agree to the 3-year lease extension at Great Central House.**

**Reasons for decision**

Cabinet agreed to extend the Council's lease of Great Central House in South Ruislip which provides 18 one-bedroomed flats for temporary emergency housing accommodation for vulnerable residents in line with the Council's statutory responsibilities.

**Alternative options considered and rejected**

Cabinet could have decided to source alternative accommodation which would not have been either desirable or cost-effective.

<b>Relevant Select Committee</b>	Environment, Housing & Regeneration
<b>Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)</b>	5pm, Friday 10 September 2021
<b>Officer(s) to action</b>	Ben Sargent
<b>Directorate</b>	Planning, Environment, Education & Community Services
<b>Classification</b>	<b>Private</b>  <i>Whilst the Cabinet's decisions above are always made public, the officer report relating to this matter is not because it was considered in the private part of the meeting and contained information relating to the financial or business affairs of any particular person (including the Authority holding that information) and the public interest in withholding the information outweighed the public interest in disclosing it in accordance with Section 100(A) and paragraph 3 of Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended).</i>

## 11. BACKUP CONTRACTOR FOR REACTIVE REPAIRS MAINTENANCE SERVICE

### RESOLVED:

That the Cabinet accept the tender for the provision of a backup contractor for reactive repairs maintenance service, corporate sites, complaints, and property repairs to the Council's general needs housing stock, to PFL Electrical Services Ltd for 3+2 years, at a cost of £1.505m over 5 years (£903k over 3 years, £301k per annum).

### Reasons for decision

Cabinet agreed to award a 3-year contract, with the option to extend, in order to support the in-house repairs service to undertake day-to-day responsive repairs to social housing and other corporate properties owned by the Council.

### Alternative options considered and rejected

Cabinet could have considered obtaining ad-hoc tenders for works, but this would have resulted in delays to the completion of repairs.

<b>Relevant Select Committee</b>	Corporate, Finance & Property
<b>Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)</b>	5pm, Friday 10 September 2021
<b>Officer(s) to action</b>	Gary Penticost
<b>Directorate</b>	Infrastructure, Transport and Building Services
<b>Classification</b>	<b>Private</b>  <i>Whilst the Cabinet's decisions above are always made public, the officer report relating to this matter is not because it was considered in the private part of the meeting and contained information relating to the financial or business affairs of any particular person (including the Authority holding that information) and the public interest in withholding the information outweighed the public interest in disclosing it in accordance with Section 100(A) and paragraph 3 of Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended).</i>

## 12. VOLUNTARY SECTOR LEASE

### RESOLVED:

That Cabinet agrees the rent set out in the table below, which has been the subject of negotiation with the voluntary sector organisation detailed in this report and instructs officers to complete the legal documentation.

### Reasons for decision

Cabinet made a decision regarding a rent review for the Bessingby Park and Deane Park Bowling Clubs who use the Bowls Pavilion at Bessingby Park. Cabinet's decision enabled the organisation concerned to benefit from heavily discounted rent as part of the Council's Voluntary Sector Leasing Policy and wider commitment to a vibrant local voluntary sector.

### Alternative options considered and rejected

None.

<b>Relevant Select Committee</b>	Corporate, Finance & Property
<b>Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)</b>	5pm, Friday 10 September 2021
<b>Officer(s) to action</b>	Michele Wilcox
<b>Directorate</b>	Infrastructure, Transport & Building Services
<b>Classification</b>	<b>Private</b>
	<i>Whilst the Cabinet's decisions above are always made public, the officer report relating to this matter is not because it was considered in the private part of the meeting and contained information relating to the financial or business affairs of any particular person (including the Authority holding that information) and the public interest in withholding the information outweighed the public interest in disclosing it in accordance with Section 100(A) and paragraph 3 of Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended).</i>



**13. ANY OTHER ITEMS THE CHAIRMAN AGREES ARE RELEVANT OR URGENT**

No additional items were considered by the Cabinet.

The meeting closed at 7.17pm

**Internal Use only\***

**Implementation of decisions & scrutiny call-in**

**When can these decisions be implemented by officers?**

Officers can implement Cabinet's decisions in these minutes only from the expiry of the scrutiny call-in period which is:

**5pm, Friday 10 September 2021**

However, this is subject to the decision not being called in by Councillors on the relevant Select Committee. Upon receipt of a valid call-in request, Democratic Services will immediately advise the relevant officer(s) and the Cabinet decision must then be put on hold.

**Councillor scrutiny call-in of these decisions**

Councillors on the relevant Select Committee shown in these minutes for the relevant decision made may request to call-in that decision. The call-in request must be before the expiry of the scrutiny call-in period above.

Councillors should use the Scrutiny Call-in App (link below) on their devices to initiate any call-in request. Further advice can be sought from Democratic Services if required:

[Scrutiny Call-In - Power Apps](#) (secure)

**Notice**

These decisions have been taken under The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012.

This Cabinet meeting was also broadcast live on the Council's YouTube channel [here](#) for wider resident engagement.

Please note that these minutes and decisions are the definitive record of proceedings by the Council of this meeting. If you would like further information about the decisions of the Cabinet, please contact the Council below:

[democratic@hillington.gov.uk](mailto:democratic@hillington.gov.uk)

Democratic Services: 01895 250636

Media enquiries: 01895 250403

This page is intentionally left blank

## REVIEW BY THE EXTERNAL SERVICES SELECT COMMITTEE - REVIEW OF CHILDREN'S DENTAL SERVICES

<b>Cabinet Member(s)</b>	Councillor Jane Palmer Councillor Sue O'Brien
<b>Cabinet Portfolio(s)</b>	Cabinet Member for Health and Social Care Cabinet Member for Families, Education and Wellbeing
<b>Officer Contact(s)</b>	Nikki O'Halloran, Democratic Services
<b>Papers with report</b>	External Services Select Committee's review of 'Children's Dental Services'

### HEADLINES

<b>Summary</b>	To receive the External Services Select Committee review into 'Children's Dental Services'. To give consideration to the recommendations of the review.
<b>Putting our Residents First</b>	This report supports the following Council objective of: <i>Our People</i> .
<b>Financial Cost</b>	The recommendations proposed as a result of this review do not in themselves have a direct financial impact on Council finances.
<b>Relevant Select Committee</b>	External Services Select Committee
<b>Relevant Ward(s)</b>	All

### RECOMMENDATIONS

That Cabinet welcomes the review by the External Services Select Committee and acknowledges, appreciates and recognises the work that is already being undertaken across the Borough to improve dental health outcomes for children in Hillingdon. Furthermore, Cabinet agrees the recommendations made by the Committee set out below:

1. That the Cabinet Member for Health and Social Care write to the Department of Health and Social Care / Secretary of State for Health and Social Care, The Rt Hon Sajid Javid MP, to request that a proportion of the Soft Drinks Industry Levy (SDIL) be ringfenced for dental health initiatives;
2. That the North West London Clinical Commissioning Group (NWL CCG) be asked to liaise with NHS England regarding the collection and carry forward of any unused Units of Dental Activity (UDAs) in Hillingdon within the year for redistribution to local dental

related action programmes / initiatives such as fluoride varnishing in schools;

3. That the Cabinet Member for Health and Social Care liaise with pan London counterparts to encourage the fluoridation of water supplies across London;
4. That the Council's Early Years team liaise with private and local authority run nurseries (as well as school nurseries and Children's Centres) in Hillingdon to encourage routine supervised brushing after meals;
5. That the North West London Clinical Commissioning Group be asked to liaise with dentists locally to agree a way that children under the age of 11 can be guaranteed an appointment;
6. That the Corporate Director of Social Care & Health be asked to ensure that health visitors provide new mothers with information about free NHS dental services and brushing kits at their first contact and ask the Royal College of Paediatrics and Child Health to include oral health information in the Personal Child Health Record ('red book');
7. That Corporate Director of Social Care & Health ensure that training be made available for health professionals such as health visitors and school nurses on the promotion of good oral health;
8. That the Families, Health and Wellbeing Select Committee receives annual updates from Public Health on the performance of dental health services commissioned by the NHS in Hillingdon; and
9. That the Health and Wellbeing Board oversee a comprehensive communications and education plan on oral health coordinated by a Children & Young People's Dental Health task and finish group.

#### **Reasons for the recommendations**

To consider the report of the External Services Select Committee's review into 'Children's Dental Services'.

#### **Alternative options considered / risk management**

The Cabinet could decide to reject some, or all, of the Committee's recommendations or pursue alternative routes by which to progress the objectives of the review.

## **SUPPORTING INFORMATION**

On 21 May 2015, the Council's Social Services, Housing and Public Health Policy Overview Committee presented a report to Cabinet on children's oral health. Given that children's oral health continues to be a matter of concern both nationally and at a local level, at its meeting on 9 October 2019, the External Services Select Committee received an information report and heard from witnesses in relation to this topic. In light of the evidence received, it was agreed that the

Committee would undertake a review of dental services in the Borough; specifically focussing on service provision for children and young people and the effectiveness of preventative measures taken by partners in relation to caries and other oral health issues. The Committee has now concluded its review and a report, supported by nine recommendations, was endorsed by the Committee at its meeting on 15 September 2021 for submission to Cabinet.

Members discovered that, in London, about 1 in 4 five year olds have tooth decay with an average of four teeth affected. In 2017/18, this resulted in about 7,000 children in London under 10 years old having one or more teeth extracted in hospital because of tooth decay. In that same year in Hillingdon, more than double the number of 5-9 year olds were admitted to hospital for dental decay than for tonsillitis.

The review heard from key witnesses and considered how partners could work together to help improve residents' oral health, in particular the oral health of children in the Borough.

The following Terms of Reference were agreed by the Committee from the outset of the review:

1. To gain a thorough understanding of the current dental service provision offered to children and young people within the Borough and to consider possible areas for improvement;
2. To explore the current situation in relation to the dental health of children and young people in the Borough and to consider how this can be improved on;
3. To identify barriers to attendance – reasons for current low attendance rates and what can be done to address this issue;
4. To review current and future plans by health partners to prevent incidences of caries and to improve oral health;
5. To examine best practice elsewhere through case studies, policy ideas and witness sessions;
6. To review the current policies, legislation, research and campaigning by Government to improve children's oral health and to explore best practice and advice that could be adopted by the NHS; and
7. After due consideration of the above, to bring forward recommendations to Cabinet for Council endorsement, before being sent to health partners to consider.

Because of the restrictions associated with the Covid-19 pandemic, Members embraced new methods of investigation through virtual means. Through a range of informal information gathering sessions with and formal witness sessions (as outlined in the report), the Committee sought to gain an understanding of the nature and extent of action that was being taken in the Borough to address poor oral health in children. Considering all factors, the Committee has made recommendations to build on the positive work already being undertaken by partners and to ensure that there is oversight of the progress made.

### **Officer Comments on Recommendations**

The recommendations have been reviewed by the relevant senior officers. Officers are supportive of the recommendations and have raised no issues regarding their feasibility.

### **Financial Implications**

The recommendations resulting from this review will not require any additional resources.

## RESIDENT BENEFIT & CONSULTATION

### **The benefit or impact upon Hillingdon residents, service users and communities**

The recommendations will help to improve awareness of oral health and ensure that interventions continue to be in place to support this.

### **Consultation carried out or required**

The Committee sought a wide range of external witness testimony as set out in its report.

## CORPORATE CONSIDERATIONS

### **Corporate Finance**

Corporate Finance has reviewed this report, noting that there would be no direct financial implications of the Select Committee's recommendations in respect of processes and joint working with partner organisations.

### **Legal**

The Borough Solicitor has confirmed that there are no specific legal implications arising from this report.

## BACKGROUND PAPERS

NIL.

# Children's Dental Services



## **A review by the External Services Select Committee**

**Councillors on the Committee:** Councillors Nick Denys (Chairman), Devi Radia (Vice-Chairman), Simon Arnold, Darran Davies, Heena Makwana, Peter Money (Opposition Lead) and June Nelson

**2020/2021-2021/2022**

## Contents

	Page
<b>Chairman’s Foreword</b>	<b>3</b>
<b>Summary of recommendations to Cabinet</b>	<b>5</b>
<b>Background to the review</b>	<b>7</b>
<b>Evidence and witness testimony</b>	<b>8</b>
Responsibilities	8
Context - national trends and focus	8
Regional concerns and health inequalities	9
<b>The Committee’s Findings</b>	<b>10</b>
Emergency Interventions	10
Interventions	11
Dentists	15
Healthy Living	16
<b>About the Review – witnesses and activity</b>	<b>20</b>
<b>References</b>	<b>22</b>



## Chairman's Foreword

### 'A Review of Children's Dental Services'



*"Nothing you wear is more important than your smile." – Connie Stevens*

Young children in Hillingdon have higher levels of dental decay than is average for England. The latest figures show that 32.5% of children aged five have suffered from dental decay, the seventh highest in London. In some cases, the dental decay in a child's mouth has been so bad that they have had to be rushed to hospital and given surgery under anaesthetic. This is not a new problem or an unknown one. In 2015, the Council's Social Services, Housing and Public Health Policy Overview Committee produced an excellent report highlighting the concerns we have with children's dental care in Hillingdon.

Dental care is about more than just teeth, it is about physical and mental health. Concerns about oral health are often an early indicator that problems will arise in general health – for example lung disease and diabetes. Oral health is strongly associated with health inequalities and there is a clear divide in the quality of oral health between the most deprived and the least deprived areas. This divide does not just affect a person's physical health, it also impacts on the confidence they have to interact with the world. Research shows that those who are positive about their oral health have higher self-confidence<sup>1</sup>. It has also been found that insecurities about smiling and oral health have a direct impact on employment opportunities<sup>2</sup>.

During our investigations, the Committee concluded that there were four levels of activity that affected children's oral health, which have been illustrated as a triangle in the main body of the report. The base of the triangle is *healthy living*, which encompasses people making healthy lifestyle choices such as brushing their teeth regularly and reducing the consumption of sugary foods. These activities are the foundation of good oral health. The next segment is *dentists* who provided ongoing primary dental care and advice to patients. Then comes *active interventions* such as fluoride varnishing and supervised brushing, which can help those who have missed support available during the first two layers. At the top of the triangle is *emergency interventions*, such as surgery. The bad news is that approximately one third of children in Hillingdon fall into the top half of the triangle. The good news is that the Committee has identified nine strategic interventions that can increase the number of children who get all their oral health needs satisfied in the lower quadrants, thus preventing the need for the more traumatic and costly interventions.

<sup>1</sup> [http://images.connecting.cigna.com/Web/CIGNACorporation/%7B1068fec3-a6d7-48c1-9664-05ccebba3710%7D\\_930138\\_Self\\_Esteem\\_Article\\_Dental\\_flyer.pdf](http://images.connecting.cigna.com/Web/CIGNACorporation/%7B1068fec3-a6d7-48c1-9664-05ccebba3710%7D_930138_Self_Esteem_Article_Dental_flyer.pdf)

<sup>2</sup> <http://hrnews.co.uk/taking-a-bite-out-of-life-more-than-half-of-brits-say-having-bad-teeth-would-affect-their-confidence-in-the-workplace/>

The NHS model focuses too much on commissioning services to treat oral health problems rather than preventing it. The cost to the NHS of treating oral health conditions is around £3.4 billion per year. Dental decay and gum disease were the most common oral conditions, both of which are largely preventable through the maintenance of good oral health practices. A significant amount of money, £10m in London per year, that is allocated to public oral health care gets lost due to underutilisation of primary dental services in some areas. If this money could be re-invested locally to target specific preventative health interventions then the cost of treating problems should decline.

Oral health can sometimes be the Cinderella of health care advice. There currently exists good mechanisms to convey information to parents about bringing up healthy children, such as the maternity red book, but very often messages about oral health are not included. Inserting advice about how to develop good oral health habits into these existing tracks should teach more parents and children the benefits of constant maintenance to avoid dramatic interventions.

By the time the Committee concluded our review, we came to the positive conclusion that many of the oral health problems that children suffer from are preventable and there exists much local will and expertise to improve oral health outcomes. We hope that our recommendations will stimulate the different actors who have responsibility for public oral health care to reevaluate how they use their skills and resources so that the gaps are filled with smiles.

On behalf of the Committee I would like to thank all the witness who shared their views and time with us. I would also like to thank the Committee and Councillor Brightman for their curiosity and analysis of the issue, and Democratic Services for the invaluable support they gave us.

**Councillor Nick Denys**

**Chairman, External Services Select Committee  
Councillor for Eastcote and East Ruislip Ward**

## Summary of recommendations to Cabinet

Through the witnesses and evidence received during the detailed review by the Committee, Members have agreed the following recommendations to Cabinet:

**1** That the Cabinet Member for Health and Social Care write to the Department of Health and Social Care / Secretary of State for Health and Social Care, The Rt Hon Sajid Javid MP, to request that a proportion of the Soft Drinks Industry Levy (SDIL) be ringfenced for dental health initiatives.

**2** That the North West London Clinical Commissioning Group (NWL CCG) be asked to liaise with NHS England regarding the collection and carry forward of any unused Units of Dental Activity (UDAs) in Hillingdon within the year for redistribution to local dental related action programmes / initiatives such as fluoride varnishing in schools.

**3** That the Cabinet Member for Health and Social Care liaise with pan London counterparts to encourage the fluoridation of water supplies across London.

**4** That the Council's Early Years team liaise with private and local authority run nurseries (as well as school nurseries and Children's Centres) in Hillingdon to encourage routine supervised brushing after meals.

**5** That the North West London Clinical Commissioning Group be asked to liaise with dentists locally to agree a way that children under the age of 11 can be guaranteed an appointment.

**6** That the Corporate Director of Social Care & Health be asked to ensure that health visitors provide new mothers with information about free NHS dental services and brushing kits at their first contact and ask the Royal College of Paediatrics and Child Health to include oral health information in the Personal Child Health Record ('red book').

**7**

**That Corporate Director of Social Care & Health ensure that training be made available for health professionals such as health visitors and school nurses on the promotion of good oral health.**

**8**

**That the Families, Health and Wellbeing Select Committee receives annual updates from Public Health on the performance of dental health services commissioned by the NHS in Hillingdon.**

**9**

**That the Health and Wellbeing Board oversee a comprehensive communications and education plan on oral health coordinated by a Children & Young People's Dental Health task and finish group.**

## Background to the review

On 21 May 2015, the Council's Social Services, Housing and Public Health Policy Overview Committee presented a report to Cabinet on children's oral health<sup>3</sup>. During the single meeting review, Members had considered information from witnesses about the work that was being undertaken in relation to children's oral health in the Borough, noting the preventative measures being taken at the time to include the Early Years Programme and Brushing for Life campaign.

Given that children's oral health continues to be a matter of concern both nationally and at a local level, at its meeting on 9 October 2019, the External Services Select Committee received an information report and heard from witnesses in relation to this topic. At this meeting, Members heard that:

- In London, about 1 in 4 five year olds have tooth decay with, on average, 4 teeth affected<sup>4</sup>
- In 2016/17, the proportion of five year olds with tooth decay in London ranged from 14% to 40% compared to the national average of 23%<sup>2</sup>
- In London, tooth decay is the top cause of non-emergency hospital admissions amongst 5-9 year olds<sup>5</sup>
- In 2017/18, about 7,000 children in London aged under 10 years had 1 or more teeth extracted in hospital because of tooth decay<sup>3</sup>
- In Hillingdon, more than double the number of 5-9 year olds were admitted to hospital for dental decay (also known as caries) than for tonsillitis in 2017/18
- Inequalities in oral health are strongly associated with social deprivation
- Oral health impacts profoundly on a child's development

In light of such concerning evidence, it was agreed that the Committee would undertake a review of dental services in the Borough; specifically focussing on service provision for children and young people and the effectiveness of preventative measures taken by partners in relation to caries and other oral health issues. The primary remit of the review was to explore the current situation within Hillingdon and consider possible areas for improvement, with a view to increasing customer satisfaction and reducing the incidences of tooth decay in the young.

---

<sup>3</sup><https://modgov.hillingdon.gov.uk/ieListDocuments.aspx?CId=115&MId=1971&Ver=4>

<sup>4</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/768368/NDEP\\_for\\_England\\_OH\\_Survey\\_5yr\\_2017\\_Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/768368/NDEP_for_England_OH_Survey_5yr_2017_Report.pdf)

<sup>5</sup> <https://digital.nhs.uk/data-and-information/publications/statistical/hospital-admitted-patient-care-activity/2017-18>

## Evidence & Witness Testimony

### Responsibilities

It was established that dental services were not the responsibility of the local authority. However, the External Services Select Committee had a statutory remit to scrutinise the performance of local health services and the Council's Families, Health and Wellbeing Select Committee had responsibility for scrutinising public health issues.

NHS England (NHSE) was responsible for the commissioning of all dental services including specialist, community and out of hours dental services. Most dentistry within the Borough was provided by private practitioners paid to deliver frontline NHS services, many of whom also provided, on a commercial basis, services which the NHS did not provide (private dental examination and treatment as well as cosmetic).

### Context - national trends and focus

The NHS England / Improvement (NHSE/I) spend on dental services in 2019 was around £391m in London and Hillingdon was 22<sup>nd</sup> in terms of the amount of funding it received. The Borough had a population of around 309,000, had 33 dental practices (which had NHS contracts) and 103 dentists. However, given the current contract arrangements, there was no opportunity for practices to expand or develop insofar as NHS patients were concerned. With a growing population and large number of dental practices in the Borough not taking on new NHS patients, this would have an impact on children's oral health and no organisation appeared to have responsibility for picking up those children that had been left without a routine NHS dental service available to them.

Although NHSE could compel a GP surgery to register a resident that fell within its catchment area, this was not the case with dentists. Dentists did not have catchment areas, people did not need to 'register' with a dental practice and there was no body that could compel a dentist to treat or assess a patient.

In relation to dental health in the UK, there were concerning levels of variation throughout the country and between different socioeconomic groups; on the whole, dental health was better in the south and east of England and poorer in the north of England.

Poor oral health had been associated with a number of general health conditions such as respiratory diseases and poor diabetic control. There was also an association between chronic gum disease and cardio-vascular disease. The cost to the NHS of treating oral health conditions was around £3.4 billion per year. Dental decay (caries) and gum disease were the most common oral conditions and were largely preventable through the maintenance of good oral health practices.

Poor oral health may be indicative of dental neglect and wider safeguarding issues<sup>6</sup>. Regular dental check ups can help to highlight these problems and dental teams can contribute to a multi-agency approach to safeguarding.

Good oral health was fundamental in facilitating good general health and wellbeing. In recent years, there had been a focus on adopting preventative strategies to combat major public health concerns facing the UK. There were large scale public health campaigns addressing widespread concerns such as obesity and type-II diabetes; however, more needed to be done to ensure that the focus on prevention in dental health was joined up with wider efforts to prevent ill health.

## Regional concerns and health inequalities

Although dental health was generally better in the south and east of England, in 2019 Londoners were the least likely to see an NHS dentist, with just 44% having had a check-up in the previous 24 months (NHSE, 2019) (NHSE)<sup>7</sup>. Nationwide, the number of adults accessing NHS dental services in 2019 had fallen to a 10-year low with just 50.2% of adults reporting that they had seen a dentist within the previous two years. Attendance at NHS dentistry services had become a matter of growing concern and links had been drawn between the prevalence of gum disease and individuals who did not visit the dentist regularly.

The most prominent reason cited for the unwillingness to access dental services was the increasing cost; more than a third of survey respondents (36%) admitted to sacrificing dental visits due to financial concerns. This highlighted the need to emphasise the availability of free NHS dental treatment, specifically for those in receipt of low-income benefits, as access to these services remained low for this demographic.

Since 2010, net Government expenditure in England on dental services had dropped by £550 million in real terms; over the same period, the cost to the service user had increased by more than 30%. However, cost was not the only barrier to attendance; other factors such as anxiety (22%), the fear of getting bad news (18%) and work commitments (8%), were also reasons why people stayed away.

Lifestyle choices such as amount and frequency of consumption of foods and drinks that contained free sugars<sup>8</sup> had a major impact on oral health. For example, tobacco use and drinking alcohol above the recommended levels were risk factors for oral cancer. The combined effect of drinking alcohol and using tobacco multiplied the risk of developing mouth cancer. Moreover, other factors, often associated with socio-economic circumstances (such as poor diet) contributed to health inequalities and a divide in the quality of oral health between the most deprived and the least deprived areas.

During the course of their investigations, Members found that there were four distinct levels of

---

<sup>6</sup> LGA (2016) [Tackling poor oral health in children: local government's public health role | Local Government Association](#)

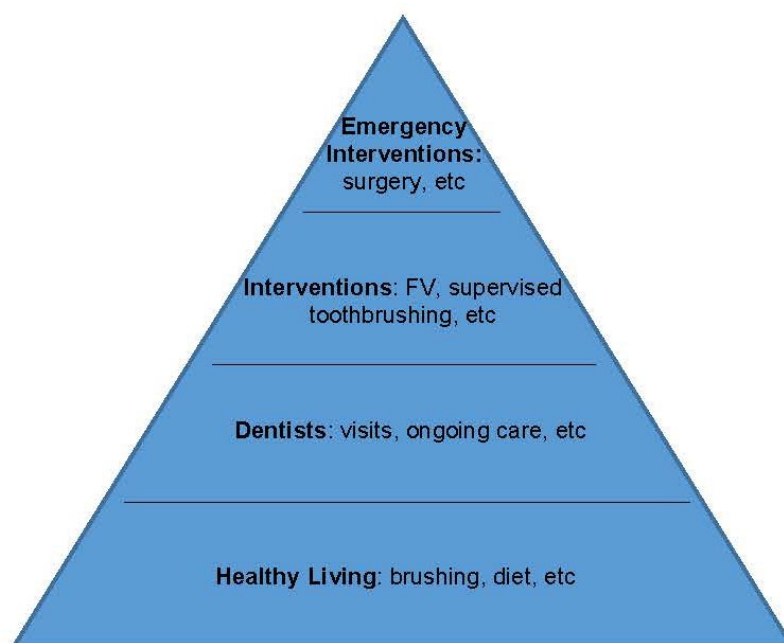
<sup>7</sup> Patient Survey Dental Statistics – [https://www.england.nhs.uk/statistics/2019/07/11/gpps\\_dent\\_8492\\_822742/](https://www.england.nhs.uk/statistics/2019/07/11/gpps_dent_8492_822742/)

<sup>8</sup> Free sugar is defined as any sugar added to a food, plus sugar that is naturally present in fruit juices, honey and syrup



activity which affected children’s oral health and which needed to be addressed and which could be illustrated in a triangle (see diagram below).

The lower these issues were in the list (e.g., Healthy Living), the cheaper they would be to address and the more effective they would be in preventing the need for action to be taken in areas higher up in the diagram.



*Healthy living* (effective brushing, diet, etc) was seen as the foundation of good oral health. Above that were *Dentists* who provided ongoing care and advice to patients. Then came *active Interventions* such as fluoride varnishing and supervised brushing and at the top of the triangle sat *Emergency interventions* including surgery. Therefore, interventions aimed at the lower end of this triangle would prevent the need for the potentially more traumatic and costly interventions at the top of the triangle.

## The Committee’s Findings

### Emergency Interventions

One of the dental health issues of particular concern within the Borough, which had been prioritised as part of Hillingdon’s Health and Wellbeing Strategy for 2018-21, is that young children in Hillingdon have levels of dental decay which are higher than the average for England. The 2015 National Dental Epidemiology Programme found that the percentage of children aged five years old affected by dental decay in Hillingdon (37.8%) was only exceeded by one other London borough (Ealing, 39%). This paints a picture of a localised issue in North West London as Harrow also experienced a high proportion of child dental decay at 34.2%. The prevalence of decay has been partly attributed to long term bottle use; this suggests that action to discourage long term



bottle use and sugary drinks consumption will be required alongside encouraging good oral hygiene habits in babies and children if oral health levels are to be improved.

A 2010 Oral Health Needs Assessment, conducted by NHS Hillingdon, found that in Hayes and Harlington there was a particularly high unmet need in both referral to specialist services and in community dental services. Whittington Health NHS Trust is the current provider of community dental services in Hillingdon, having assumed responsibility for this service from the previous provider (Central and North West London NHS Foundation Trust) in April 2019.

Access to dental services has been negatively impacted by the pandemic with residents finding it increasingly difficult to get an NHS appointment (existing patients and new patients). During this time, dental related hospital admissions have been highest for those aged 5-9.

The Paediatric Dental Network (PDN) in North West London (NWL) comprises clinicians from the NHS with a focus on paediatric dentistry. Work has recently been channelled towards addressing the huge backlog of children that need dental treatment under general anaesthetic (GA) by trying to increase capacity. A network of dental practices is also being developed to help improve skills. It is generally agreed that there needs to be a greater focus on supporting upstream public health programmes as the driver for GA activity is tooth decay in children.

## Interventions

Whatever interventions are undertaken in relation to children's oral health in Hillingdon, it will be important to monitor their effectiveness and to establish a focussed and sustained approach which covers the wider population. The child population in Hillingdon increases by approximately 4,000 each year. As such, 'one off' interventions will not be useful in the long term as there will always be new parents and children that need to be brought up to speed on how best to care for their teeth.

### Soft Drinks Industry Levy (SDIL)

The Government's Soft Drinks Industry Levy (SDIL), more commonly known as the sugar tax, was introduced in April 2018 as part of the childhood obesity strategy; the measure introduced levies of 24p per litre for drinks containing >8g of sugar per 100ml and 18p per litre for drinks containing 5-8g of sugar per 100ml. Its aim was to reduce sugar consumption, a leading cause of dental caries<sup>9</sup>, by persuading companies to reformulate their high sugar brands and avoid paying the levy.

In the two years preceding the introduction of the tax, many soft drinks manufacturers reduced the sugar content of their beverages in preparation for the levy; as a result, HMRC reduced its revenue forecast from the levy to £275m from an initial £520m during the first year of operation. The revenue generated from the SDIL was to be earmarked to help fund physical education activities in primary schools, the Healthy Pupils Capital Fund and provide a funding boost for

---

<sup>9</sup>Advances in Nutrition - Sugars and Dental Caries

breakfast clubs in over 1,700 schools. However, as the primary objective of the levy was to tackle childhood obesity rates, there were calls from the Global Child Dental Fund for 20% of the proceeds to be reinvested into innovative oral health prevention strategies.

Research on the practical implications of the UK's SDIL on dental health is in its early stages; however, a 2019 Dutch-German study estimated that a 20% taxation on sugary beverages would result in a €159m saving in terms of Government dental care expenditure<sup>10</sup>; concluding that, an intervention of this kind could substantially improve oral health and reduce the caries-related economic burden.

There are frequent calls for the sugar tax to go further and cover other confectionery products. Although soft drinks account for 10% of a child's sugar intake, confectioneries such as sweets, ice cream and puddings make up more than a fifth of their sugar intake. The early successes of the SDIL in changing the behaviours of soft drinks manufacturers has fuelled calls for a more extensive sugar tax, particularly to help address wider health problems; such as the 29% of UK adults classified as obese and the nearly five million people living with type-II diabetes.

To ensure that the revenue generated by SDIL contributes towards initiatives that address dental health as well as physical health, it is recommended by the Committee:

**1**

**That the Cabinet Member for Health and Social Care write to the Department of Health and Social Care / Secretary of State for Health and Social Care, The Rt Hon Sajid Javid MP, to request that a proportion of the Soft Drinks Industry Levy (SDIL) be ringfenced for dental health initiatives.**

## Ringfencing UDAs

In 2006, dental practices had been issued with new contracts by NHSE/I which gave a figure for a practice in return for a specified number of UDAs (Units of Dental Activity). The number of UDAs each practice was awarded varied and the value of each UDA varied for each practice but the number of UDAs needed for a particular procedure was the same for every practice (the value of one UDA may be higher in an area where there are fewer dentists). These units would be utilised exclusively for NHS work.

The current NHS contracts are coming to an end and will be due for negotiation and reform in April 2022. Practices have not previously been given any guidance or direction by NHSE/I on how many of their UDAs should be used on adults or how many on children so it has been suggested that the new contracts should specify the proportions of UDAs that should be used by a practice on each age cohort.

Currently, at the end of the year, if a practice has not used all of its UDAs, these (and the

---

<sup>10</sup> [Public Health - Caries related effects of a tax on sugar-sweetened beverages](#)

associated funding) will be clawed back by NHSE/I from the practice and put back into general funds. This clawed back funding is not ringfenced for reinvestment into dental services.

A total of 308,000 units of dental activity (UDAs) are commissioned annually in Hillingdon across the 33 dental practices in the Borough and this allocation must be used before 31 March each year. Those dentists who have contracts for a large number of UDAs are often unable to meet their targets and any unspent funds relating to unused UDAs are clawed back by NHSE. Conversely, if a practice does not have enough UDAs remaining, they cannot obtain additional UDAs and will therefore be unable to accept any new patients. In London in 2018, £10m was clawed back and none of this money was re-invested in dental services.

To address this gap in UDA excess/shortfall, Members are keen that NHSE/I be asked to carry any unused UDAs in the Borough into the subsequent financial year and that this funding then be used to support oral health related initiatives and interventions such as fluoride varnishing. In 2015, NHSE funded a local fluoride varnish project where dentists were commissioned to examine children's teeth in schools located within areas of high deprivation in Hillingdon, and applied fluoride varnish based on clinical assessments. This was further underpinned by a local campaign to encourage families to take their children to dentists for regular dental check ups. This project exemplifies good use of funds which accumulate as a result of families not accessing dental check ups in the first place. As the distribution of UDAs is broken down into two or three batch releases, their use could be reviewed during the year.

On that basis, the Committee recommends:

**2**

**That the North West London Clinical Commissioning Group (NWL CCG) be asked to liaise with NHS England regarding the collection and carry forward of any unused Units of Dental Activity (UDAs) in Hillingdon within the year for redistribution to local dental related action programmes / initiatives such as fluoride varnishing in schools.**

## Fluoride Varnishing

Fluoride is a naturally occurring mineral found in water supplies in varying amounts and in some foods; it has beneficial topical effects on teeth. Public Health England advise that all adults and children brush their teeth with fluoridated toothpaste at least twice daily to help prevent tooth decay.

Public Health England recommends the application of fluoride varnish to be considered at least twice a year in adults and children who are causing concern to their dentist.

Whittington Health NHS Trust presented an example where they had undertaken a programme of fluoride varnishing in schools elsewhere in London and, 10 years later, the level of dental caries had reduced significantly. During the programme, the parents of those children who were found to have decay were advised to take them to the dentist. Although effective, this was thought by some to be one of the more expensive types of intervention.

Fluoride varnish contains alcohol due to which some patients of Islamic faith are reluctant to allow fluoride varnishing as they believe it is contrary to their religion. A statement was released by the West Midlands Sharia Council advising that this was incorrect due to the medicinal purpose in this case as opposed to intoxication. However, this statement has not been widely communicated and understood. Nonetheless, it is acknowledged that fluoride varnishing as such is not the answer...behaviours need to change too.

### Water Fluoridation

The variation in children's dental decay can in part be attributed to the fact that, in some regions, fluoride has been added to the water (and children's dental health is significantly better in those areas); this is not the case in London. At present, roughly 10% of the UK water is fluoridated.

Water fluoridation has not been implemented everywhere due to some opposition to it. For example, a number of people believe fluoride to be poisonous and are concerned that the fluoridation of water can cause bones to become weaker; these have been proven to be false beliefs.

A reorganisation of the NHS has been set out in a White Paper which will make it easier to fluoridate the water and help reduce dental decay significantly. Although this would reduce inequalities, it is recognised that there are significant challenges associated with fluoridating the water supply to 32 London boroughs due to the number of councils and water companies that would need to be coordinated and that, as such, the sooner action is taken to start the process the sooner it will be achieved.

'The Health and Care Bill: Water Fluoridation', published on 19 July 2021, looks to transfer responsibility for water fluoridation from local authorities to the Secretary of State. the purpose of the water fluoridation clauses in the Bill are to give the Secretary of State the power to directly introduce, vary or terminate water fluoridation schemes. The revenue costs of the schemes would also transfer to the Secretary of State. This will allow central government to directly take responsibility for fluoridation schemes. Any future decisions on new fluoridation schemes will be subject to funding being secured.

On that basis, the Committee recommends:

**3**

**That the Cabinet Member for Health and Social Care liaise with pan London counterparts to encourage the fluoridation of water supplies across London.**

### Supervised Toothbrushing

In terms of addressing levels of tooth decay in the Borough, strategies are needed to improve access to services but also to reduce the need for services. Dental decay and gum disease can be both prevented and reduced by regular toothbrushing with fluoride toothpaste. Children need

to be helped or supervised by an adult until age 7 at least to ensure they brush their teeth in the right way. A number of schemes have taken place to promote oral health in children and young people which include: supervised brushing in schools in areas of deprivation where there are also high levels of tooth decay in children; the distribution of toothbrush and toothpaste packs ('Brush for Life' scheme); and train the trainer sessions for staff working in children's settings.

Unfortunately, the level and type of oral health promotional activity in Hillingdon is likely to fall short of that required to address the high level of tooth decay in the Borough. What is required is more targeted programmes, such as fluoride varnish and supervised toothbrushing programmes, which have evidence to show reduction in decay levels.

To this end, a programme of supervised toothbrushing has been set up in Hillingdon with ten schools already signed up. However, some schools have refused join the programme, perhaps due to time constraints. The supervised brushing programme had been funded by NHSE but had stalled at the start of the pandemic. However, the oral health promoter had continued to work with schools during the pandemic to encourage schools' participation once the initiative restarts.

The Children and Young People's Dental Steering Group has worked to ensure that the Brushing for Life programme is delivered by health visitors and in Early Years Centres and Children's Centres in Hillingdon. This initiative has seen the distribution of toothbrush packs to those children who don't have toothbrushes (either because their parents cannot afford them or because the parents do not see it as a priority). The Children's Centres have also worked with parents on weaning and educating parents about dental health.

Members are aware that supervised brushing after meals is already undertaken in some private nurseries across the Borough on their own initiative. This targets the very young, helps to develop good habits and is a practice that could be encouraged in all nurseries (private and Council run) as well as school nurseries, perhaps in conjunction with the Brushing for Life programme.

On that basis, the Committee recommends:

**4**

**That the Council's Early Years team liaise with private and local authority run nurseries (as well as school nurseries and Children's Centres) in Hillingdon to encourage routine supervised brushing after meals.**

## Dentists

### Access and engagement

With approximately 4,000 births in Hillingdon each year, action needs to be taken to develop a sustainable programme of prevention for the long term rather than ad hoc initiatives. To support this, access to dental services needs to be improved both by increasing parental awareness of the need to visit the dentist as well as addressing the issue of parents being refused appointments for their children. It should be noted that, since 2006, residents have not needed to be 'registered'

with a dentist to receive treatment from them – which effectively means that any individual should be able to request an appointment at any dental practice which has an NHS contract, irrespective of where they live. However, not all requests for appointments are currently met and individuals are given no indication of which dental practices might have NHS capacity to be able to see them.

A pan-London pilot (Staying Well) funded by NHS England was undertaken in Hillingdon. Three dental practices signed up to the pilot and had been involved with schools that had been geographically close to them. The practices had focussed on engagement with families from the schools and they were invited to visit the practices and have dental check-ups whilst there. As dentists are usually very busy, dealing with schools as an additional task could prove to be a mammoth undertaking within existing resources. However, many dentists recognise that, if they don't go upstream with preventative / early action in some areas, they could be dealing with much more serious issues at a later date, taking up more of their limited resources.

There have been many stories of residents being unable to get an appointment with a dentist for their children (or themselves). As dentists have a public health responsibility, it has been suggested that an initiative be introduced whereby dentists within the Borough commit to never turning away a child of primary school age. To support this, it has already been recommended in this report that any UDAs which are unused locally be redistributed for use on other dental health interventions in the Borough. These interventions could include initiatives such as guaranteed appointments for children up to the end of primary school and fluoride varnishing and would ensure that the funding was used to address the increasing dental health crisis in the Borough rather than being returned to NHSE and being absorbed in general budgets.

In addition, to support the commitment to providing appointments for all children up to the end of primary school, consideration could be given to NHSE or NWL CCG maintaining a local list of dentists who have capacity/UDAs available so that they could be signposted when needed.

On that basis, the Committee recommends:

**5**

**That the North West London Clinical Commissioning Group be asked to liaise with dentists locally to agree a way that children under the age of 11 can be guaranteed an appointment.**

## Healthy Living

### Maternity / New Parent Services

It appears that the NHS model focuses on commissioning services to treat a problem rather than preventing it even though an issue such as dental decay in the very young is generally preventable. Prevention strategies are always preferable and are generally much cheaper than treatment.

The Committee believes that targeting expectant parents (and parents with new babies) with



information about looking after their children's oral health is key to improving oral health and reducing dental caries in children. Although free dental packs used to be distributed to new parents on the maternity ward, this no longer happens.

The NHS 'red book', also known as the Personal Child Health Record (PCHR), is a standard health and development record given to parents just before or at their child's birth. It contains details of the baby's growth and development and is where the baby's measurements are recorded, milestones described/noted and vaccinations are charted. The inclusion of information in the red book about free NHS dental treatment for children as well as advice about when to start brushing and the importance of having check ups with the dentist would go a long way to helping parents with their children's oral health.

A section on dental care in pregnancy has been included in the Mum & Baby app that is provided by NWL CCGs and advises women to ensure that they have regular dental check ups and highlights that NHS dental care is free to pregnant women up to the baby's first birthday. However, the app is targeted at pregnant and newly delivered women so does not stray into advice beyond 28 days which is the end of maternity remit - advice about babies' oral health then falls into the remit of health visitors.

To this end, the Committee believes that there would be benefit in strengthening the role of health visitors and school nurses in relation to children's oral health. Health visitors are in a position where they get to know parents and are more able to identify those that do not regularly visit the dentist and those whose children who are bottle fed. Once identified by health visitors, action could be taken to get fluoride varnishing for these children where needed.

Dental screening is not routinely undertaken in mainstream schools in Hillingdon so action needs to be intelligence led to ensure that the limited resources available are being directed to the children that are most in need. Although annual dental screening is undertaken in special educational needs (SEN) schools across the Borough, there is no further information available about whether or not a child subsequently sought further treatment from a dental practice. To this end, between March 2020 and March 2021, 3,180 brushing packs were distributed in schools around Hillingdon and 600 packs were supplied to three SEN schools. It is suggested that these brushing packs and information about the free NHS services available to new mothers also be provided to new parents, perhaps following first contact with the health visitors (the provision of a pack could be something that is highlighted in the red book).

On that basis, the Committee recommends:

**6**

**That the Corporate Director of Social Care & Health be asked to ensure that health visitors provide new mothers with information about free NHS dental services and brushing kits at their first contact and ask the Royal College of Paediatrics and Child Health to include oral health information in the Personal Child Health Record ('red book').**

## Education and awareness

A survey of 3 year olds carried out in 2012 showed that 16% in Hillingdon (the highest in the country - compared with 3.9% in England) had incisor caries (decay of front teeth). This showed how dental decay can start at a very early age and can be related to poor infant feeding practices.

Dr Amit Rai, a local dentist, has been working with a number of primary schools across the Borough for approximately 13 years to raise awareness of the importance of oral health. He regularly spoke at school assemblies and invited groups of under 5-year-olds to attend 1½ hour sessions at his practice in Yiewsley, during which their teeth would be checked, fluoride varnishing applied and advice given. Many of these children had never visited a dentist before. Dr Rai also provided information to school nurses to be cascaded to the children. This approach to educating the children and providing them with information about good oral health seemed to work well and make a real difference.

Many parents lack awareness and understanding of the need to look after their children's teeth from a very early age. As such, staff at children's centres across the Borough are expected to promote oral health, as are school nurses and health visitors. In reality, this does not always happen and there are no KPIs in relation to the work of school nurses or health visitors at present. As every family receives a mandatory visit from a health visitor, it has been suggested that oral health conversations could form part of these visits. This would assist in raising awareness, particularly in hard-to-reach groups.

The 0-19 service contract is currently held by Children's Services and the specification is being reviewed so that it can be re-procured, following Cabinet's agreement in December 2019 to a one-year extension of the contract. The Committee would like to see the need for oral health promotion included in the contract specification. KPIs should also be put in place to ensure the service is delivered at the level required; particularly in the south of the Borough. It is anticipated that the contract will be re-tendered and awarded by the end of the 2021 financial year.

To ensure that staff are equipped to provide parents with information on their children's oral health, the Committee recommends:

**7**

**That Corporate Director of Social Care & Health ensure that training be made available for health professionals such as health visitors and school nurses on the promotion of good oral health.**

## Collaboration and Monitoring

Consideration is currently being given to promoting specific initiatives at the same time as advising residents about other issues (for example, encouraging the take up of cervical smear tests when advising women about Covid vaccinations). It is anticipated that pregnant women will be targeted in the autumn to encourage them to get their flu vaccination. As such, consideration will be given by NWL CCG to working with key groups to providing this cohort with information about the dental



services that are available to pregnant women and their children and emphasising that these services are free.

Currently, although NHSE/I commission community dental services, local priorities are directed by the Council. The importance of monitoring the implementation of any action to deliver these priorities is clear as this will provide the local authority with information about the impact that the action and collaborative working has had on children's oral health. To ensure that the local authority has this oversight, if agreed by the Cabinet, the relevant Select Committee could request regular updates to enable them to monitor those community dental services provided in the Borough that can be influenced by the Council.

On that basis, the Committee recommends:

**8**

**That the Families, Health and Wellbeing Select Committee receives annual updates from Public Health on the performance of the community dental service in Hillingdon.**

### Communication and Promotion

Concern has been expressed that dental health does not appear to be seen as a priority and sometimes feels as if it has been forgotten. Although residents can easily access primary medical care, it is not quite so easy when trying to access good quality paediatric dental care. The nature of the current contracts held by dental practices mean that children's dental care is not given priority. With good networks already in place for physical and mental health, it has been suggested that more work is done to ensure that dental health is included as part of this existing system rather than working in isolation.

Campaigns to raise awareness of the need for good oral health and to provide signposting have previously taken place in the Pavilions shopping centre in Uxbridge before the pandemic. Promotional activity has also been undertaken with regard to weaning and healthy eating and staff and parents in early years settings have improved their understanding about the impact of things like sugary foods. Other action taken includes targeting particular communities about the need for a healthy diet to maintain oral health and improvements to the food offered at schools.

The Children & Young People's Dental Health Steering Group (C&YPDHSG) has been set up in Hillingdon to target specific areas so that the different organisations involved can collectively look at improving children's oral health in the targeted. This group includes representation from NWL CCG, Whittington, London Borough of Hillingdon, Local Dental Committee and GPs.

Providing new and expectant mothers with information about maintaining babies' oral health is thought to be key. As such, it has been suggested that information could be disseminated through antenatal classes (as pregnant women will want what is best for their child) or through platforms such as Facebook, Mumsnet, etc. A lot of activity has already been undertaken on this by the Steering Group with things like drawing competitions, a Guinness world record attempt,

campaigns and activities.

Small rewards have been found to entice engagement in initiatives and improve public health outcomes. As such, it has been suggested that low cost incentives be introduced that might help residents on limited budgets. For example, the C&YPDHSG had run a competition to draw a picture of a healthy family meal with a glow in the dark toothbrush as the prize. Pink disclosing tablets could also be distributed as part of these initiatives as a fun way for children to identify the effectiveness of their brushing habits.

A character called Aggie the Alien had also been created to help children in the Borough to identify with specific issues via a video. Whilst having these kinds of messages from GPs and dentists is powerful, consideration also needs to be given to the messages conveyed within communities and targeting these more proactively.

The mechanisms to convey information are already in place for other health interventions, so messages about dental health just need to be dropped into these existing tracks. All of the different agencies want to set residents up for a healthy life and will need to work together to develop effective approaches for information and messaging as a single approach will not suffice for such a huge issue.

On that basis, the Committee recommends:

**9**

**That the Health and Wellbeing Board oversee a comprehensive communications and education plan on oral health coordinated by a Children & Young People's Dental Health task and finish group.**

## About the review - witnesses and activity

The following Terms of Reference were agreed by the Committee from the outset of the review:

1. To gain a thorough understanding of the current dental service provision offered to children and young people within the Borough and to consider possible areas for improvement;
2. To explore the current situation in relation to the dental health of children and young people in the Borough and to consider how this can be improved on;
3. To identify barriers to attendance – reasons for current low attendance rates and what can be done to address this issue;
4. To review current and future plans by health partners to prevent incidences of caries and to improve oral health;
5. To examine best practice elsewhere through case studies, policy ideas and witness sessions;
6. To review the current policies, legislation, research and campaigning by Government to improve children’s oral health and to explore best practice and advice that could be adopted by the NHS; and
7. After due consideration of the above, to bring forward recommendations to Cabinet for Council endorsement, before being sent to health partners to consider.

Given the impact of the ongoing Covid-19 pandemic on witnesses ability to attend meetings in person, the Committee received evidence through formal and informal meetings from the following sources and witnesses:

<p><b>Select Panel Witness Session – 12 February 2020</b></p>	<p><b>External witnesses:</b></p> <ul style="list-style-type: none"> <li>• Dr Lalit Patel, Chair, Hillingdon Local Dental Committee</li> <li>• Dr Amit Rai, West Drayton and Yiewsley Dental</li> </ul> <p><b>Council officers in attendance:</b></p> <ul style="list-style-type: none"> <li>• Dr Steve Hajioff, Director of Public Health</li> <li>• Dan Kennedy, Director – Housing, Environment, Education, Performance, Health &amp; Wellbeing</li> <li>• Shikha Sharma, Consultant in Public Health</li> </ul>
<p><b>Virtual Chairman’s briefing - 15 June 2021</b></p>	<p><b>External attendees:</b></p> <ul style="list-style-type: none"> <li>• Andrew Biggadike, Regional DOP Lead for Acute, Community and Specialist Dental Contracts, NHS England and NHS Improvement - London Region</li> </ul>
<p><b>Committee Witness Session 1 – 16 June 2021</b></p>	<p><b>External witnesses:</b></p> <ul style="list-style-type: none"> <li>• Dr Lalit Patel, Chair, Hillingdon Local Dental Committee</li> <li>• Dr Andrew Read, Clinical Director Dental Services / Deputy Chair – Managed Clinical Network for</li> </ul>

	<p>Paediatric Dentistry in NWL, Whittington Health NHS Trust</p> <p><b>Council officers in attendance:</b></p> <ul style="list-style-type: none"> <li>• Shikha Sharma, Consultant in Public Health</li> </ul>
<p><b>Children &amp; Young People Steering Group - 17 June 2021</b></p>	<p><b>Attendees:</b></p> <ul style="list-style-type: none"> <li>• Sally McGregor, Whittington Health NHS Trust</li> <li>• Ayesha Masood, Whittington Health NHS Trust</li> <li>• Shikha Sharma, Public Health</li> <li>• Carol McLoughlin, NWL CCG</li> <li>• Laura Laryea, London Borough of Hillingdon</li> <li>• Stephen Vaughan-Smith, HCCG GP</li> <li>• Councillor Nick Denys, London Borough of Hillingdon</li> <li>• Nikki O'Halloran, London Borough of Hillingdon</li> </ul>
<p><b>Virtual Chairman's briefing – 12 July 2021</b></p>	<p><b>External attendees:</b></p> <ul style="list-style-type: none"> <li>• Dr Huda Yusuf, Consultant in Public Health / Clinical Lead for Child Healthy Weight, Homelessness and Dental Health, Public Health England (London)</li> </ul> <p><b>Council officers in attendance:</b></p> <ul style="list-style-type: none"> <li>• Shikha Sharma, Consultant in Public Health</li> </ul>
<p><b>Committee Witness Session 2 – 20 July 2021</b></p>	<p><b>External witnesses:</b></p> <ul style="list-style-type: none"> <li>• Richard Ellis, Joint Lead Borough Director, North West London Clinical Commissioning Group (NWL CCG)</li> <li>• Carol McLoughlin, CYP Dental Steering Group Chairman, NWL CCG</li> <li>• Caroline Morison, Managing Director, Hillingdon Health and Care Partners</li> </ul>
<p><b>Virtual Chairman's briefing - 23 July 2021</b></p>	<p><b>External attendees:</b></p> <ul style="list-style-type: none"> <li>• Dan West, Managing Director, Healthwatch Hillingdon</li> </ul>

## References

Advances in Nutrition (2016) “Sugars and Dental Caries: Evidence for Setting a Recommended Threshold for Intake”, Volume 7, Issue 1, January 2016, Pages 149-156, <https://doi.org/10.3945/an.115.009365>.

Cigna (2019) *Behind the Smile – Oral health Impacts Self-Esteem Confidence and Employability*. Available at: <http://images.connecting.cigna.com/Web/CIGNACorporation/%7B1068fec3-a6d7-48c1-9664-05ccebba3710%7D%20930138%20Self%20Esteem%20Article%20Dental%20flyer.pdf> (Accessed: 2 September 2021).

Gov.uk (2021) *Policy Paper: Health and Care Bill: water fluoridation*. Available at: <https://www.gov.uk/government/publications/health-and-care-bill-factsheets/health-and-care-bill-water-fluoridation>

HR News (2019) *Taking a bite out of life: More than half of Brits say having bad teeth would affect their confidence in the workplace*. Available at: <http://hrnews.co.uk/taking-a-bite-out-of-life-more-than-half-of-brits-say-having-bad-teeth-would-affect-their-confidence-in-the-workplace/> (Accessed: 2 September 2021)

Jevdjevic, M., Trescher, A.L., Rovers, M. and Listl, S. (2019) “The caries-related cost and effects of a tax on sugar-sweetened beverages”. *Public Health*, Volume 169, April 2019, Pages 125-132, <https://www.sciencedirect.com/science/article/abs/pii/S0033350619300344>

Local Government Association (2016) *Tackling poor oral health in children: local government's public health role*. Available at: <https://www.local.gov.uk/publications/tackling-poor-oral-health-children-local-governments-public-health-role>

London Borough of Hillingdon (2015) *Social Services, Housing and Public Health Policy Overview Committee Report: Children's Oral Health*. Available at: <https://modgov.hillingdon.gov.uk/documents/s26735/06%20-%20REPORT%20Dentistry%20Report%20-%20Cabinet%20report%20FINAL%20-%205.5.2015%201.pdf>

National Wellness and Public Health Network (2015) *Dental Epidemiology Programme: oral health survey of five-year-old children 2015*. Available at: [https://www.nwph.net/dentalhealth/14\\_15\\_5yearold/14\\_15\\_16/DPHEP%20for%20England%20OH%20Survey%205yr%202015%20Report%20FINAL%20Gateway%20approved.pdf](https://www.nwph.net/dentalhealth/14_15_5yearold/14_15_16/DPHEP%20for%20England%20OH%20Survey%205yr%202015%20Report%20FINAL%20Gateway%20approved.pdf)

NHS Digital (2018) *Hospital Admitted Patient Care Activity, 2017-18*. Available at: <https://digital.nhs.uk/data-and-information/publications/statistical/hospital-admitted-patient-care-activity/2017-18>

NHS Hillingdon (2010) *Oral Health Needs Assessment*. Available at:

[https://archive.hillingdon.gov.uk/media/21664/Oral-Health-Needs-Assessment---January-2010/pdf/Oral\\_Health\\_Needs\\_Assessment\\_-\\_January\\_2010.pdf](https://archive.hillingdon.gov.uk/media/21664/Oral-Health-Needs-Assessment---January-2010/pdf/Oral_Health_Needs_Assessment_-_January_2010.pdf)

Public Health England (2018) *National Dental Epidemiology Programme for England: oral health survey of five-year-old children 2017. A report on the inequalities found in prevalence and severity of dental decay*. Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/768368/NDEP\\_for\\_England\\_OH\\_Survey\\_5yr\\_2017\\_Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/768368/NDEP_for_England_OH_Survey_5yr_2017_Report.pdf)

## REVISED STATEMENT OF COMMUNITY INVOLVEMENT 2021

<b>Cabinet Member(s)</b>	Councillor Eddie Lavery
<b>Cabinet Portfolio(s)</b>	Housing, Environment and Regeneration
<b>Officer Contact(s)</b>	Julia Johnson, Planning Policy
<b>Papers with report</b>	Appendix A – Summary of SCI Consultation Responses Appendix B – Revised Statement of Community Involvement 2021

### HEADLINES

<b>Summary</b>	<p>This report seeks approval for minor changes to, and then the adoption of, the Statement of Community Involvement (SCI) following a public consultation in July 2021 which was approved by the Council at the June 2021 Cabinet meeting. A summary of the responses received from the consultation and officers' response to those comments is provided as an appendix to this report.</p> <p>The Statement of Community Involvement (SCI) is a statutory document that sets out how the Council intends to involve all sections of the community in the planning process and engage with local communities, businesses and other interested parties when developing and reviewing planning documents and determining planning applications. It will replace the Council's current Statement of Community Involvement which was adopted in 2006. The SCI establishes formal arrangements and standards to enable the community to know how and when they will be involved in the preparation, alterations and review of Hillingdon's Development Plan and other policy documents, and how they will be consulted on planning applications.</p>
<b>Putting our Residents First</b>	This report supports the following Council objectives of: <i>Our People; Our Built Environment</i> by supporting and encouraging community involvement in the planning process to achieve better planning outcomes for Hillingdon's residents.
<b>Financial Cost</b>	There are no direct financial implications associated with the recommendations to this report.
<b>Relevant Select Committee</b>	Environment, Housing & Regeneration
<b>Relevant Ward(s)</b>	All.

## RECOMMENDATIONS

### That the Cabinet:

- 1. Consider the summary of consultation comments and the Planning Policy Team's response to these comments, attached as Appendix A.**
- 2. Agree the adoption of the revised Statement of Community Involvement, attached as Appendix B.**

### Reasons for recommendation

To ensure that the Council meets its statutory requirement to have in place an up-to-date Statement of Community Involvement.

### Alternative options considered / risk management

The Council could continue to rely on the existing Statement of Community Involvement (SCI) adopted in 2006. However, this document is out of date as it does not reflect changes to legislation and planning policy and planning practice guidance since 2006. The existing SCI also does not take account of the latest consultation practices. This course of action is not recommended as this would not lead to the most effective involvement of the community in the planning process. The Council is required by legislation to review the SCI every five years and so the review and adoption of a new SCI is a statutory requirement.

It should also be noted that whilst the Council has a statutory duty to prepare and keep up-to-date an SCI, there is no requirement to consult on draft SCI documents prior to adoption. However, given the length of time since the Council adopted its last SCI and the scale of the updates it is considered good practice that the opportunity is taken to consult the local community before the final document is adopted.

### Select Committee comments

The Draft Revised SCI was presented to the Environment, Housing and Regeneration Select Committee in July 2021, following the June 2021 Cabinet meeting. The Select Committee had the following comments as set out in the minutes from the meeting:

*The Committee was requested to comment on the proposed SCI as set out in the appendix to the report (appendix refers to the SCI itself).*

*Regarding a query on how neighbourhood forums were engaged with under the terms of the SCI, the Committee was advised that there were rules for the formation of neighbourhood forums, including the minimum number of members required, together with ratification by the Council that the Forum was representative of its community. Once approved, such Forums could then be engaged as part of any relevant consultations. Regarding the format of how residents were consulted with on the matter of developments within their local area, legislation required that the Planning Authority produce a site notice*



*or that they advise neighbours, and while there was no set radius for whom should be notified, officers did have a level of discretion.*

*Members advised that some residents had complained that they had not been consulted on developments within their immediate areas.*

*Members expressed their view that further transparency on the use of CIL monies was required. In response, the Committee was advised that work was underway with the Council's ICT department to update its systems and create a new database, which would allow a greater level of detail to be reported as part of the annual CIL statement.*

*It was agreed that officers would provide further detail regarding any plans for the introduction of a refund to address damage to the public realm during constructions (e.g. damage to pavements).*

*RESOLVED: That the report be noted, and that the relevant comments made by the Committee be included in the forthcoming report to Cabinet.*

## SUPPORTING INFORMATION

### Background

1. The Council is required to produce a Statement of Community Involvement (SCI) in accordance with section 18 of the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012. The purpose of the SCI is to set out how the Council intends to involve all sections of the community in the planning process and engage with local communities, businesses and other interested parties when developing and reviewing planning documents and determining planning applications.
2. The SCI establishes formal arrangements and standards to enable the community to know how and when they will be involved in the preparation, alterations and review of Hillingdon's development plan and other policy documents, how they will be consulted on planning applications, any other ways the community can get involved in the planning process.
3. Following a June 2021 Cabinet Report which sought approval to consult on a draft version of the Revised SCI, the Planning Policy Team undertook a formal public consultation for four weeks from Friday 25<sup>th</sup> June to Friday 23<sup>rd</sup> July 2021. The Council also held a virtual meeting to allow participants to log in and discuss their queries directly with the team. A total of 11 written responses were received, the details of which are summarised in **Appendix A**.
4. For a more detailed summary of the content of the SCI, Cabinet Members should refer to the June 2021 Cabinet Report, as a background paper listed.

### Revised Statement of Community Involvement

5. Following consultation, the Council has made amendments to the SCI in response to the comments received. Although the changes made are important, the majority of the content

and the general structure of the SCI has remained the same. The changes to the SCI are presented as track changes in **Appendix B** to this report.

## Financial Implications

6. There are no direct financial implications associated with the recommendations to this report. The consultation process and revision of the Hillingdon Statement of Community Involvement has been undertaken by existing staff within the Planning Policy Team.

## RESIDENT BENEFIT & CONSULTATION

### The benefit or impact upon Hillingdon residents, service users and communities?

7. The revised SCI (Appendix B) will be beneficial for residents and the community as it will identify how they can be more involved in the planning process and shape development in their area. The SCI is designed to provide the community with the information they need to get more involved in the planning process if they wish to do so.
8. It has not been considered necessary to complete an Equalities and Human Rights Impact Assessment as there are considered to be no equalities or human rights implications associated with undertaking the consultation.

### Consultation carried out or required

#### Feedback from consultation

9. A summary of the comments received during the public consultation and the Planning Policy Team's response to these comments is provided in Appendix A. Some of the comments received, however, are written below.
10. All statutory consultees and every individual/organisation on the Council's Planning Policy Consultation Database was consulted, with details also put on the Council's consultation webpage and advertised via social media. The team also held a virtual meeting which was open to all individuals.
11. The Council received written responses from 11 different individuals or organisations in total. Feedback was generally constructive and some useful suggestions were put forward, some of which have resulted in changes being made to the SCI. Where the team has not made changes as a result of the comments received, the reasons for this have been explained in the Summary of SCI Consultation Responses (Appendix A).
12. A couple of consultees commented on how the Council should be clearer about what they will do at different stages of plan-making, rather than stating what may be done. The SCI was purposely worded this way to allow the Council flexibility to try alternative approaches depending on the circumstances and the type and effect of documents being consulted on. It is understood however that some of the wording could be strengthened to show more clearly the Council's commitment to positively engaging with communities.

13. It was also suggested by one consultee that the Council set out more clearly policies on how to specifically increase the range of community groups it engages with. In response to this, we have stated that it is considered that the engagement techniques identified in the new SCI will help achieve this, however, the commitment to reach a wider range of community groups and targeting hard to reach groups will be reiterated in the report.
14. One consultee suggested the addition of a number of useful links to guides and information on different planning topics for the community. This advice has been taken on board.
15. Regarding consultation on planning applications, a couple of consultees suggested extending the consultation period from 21 days to 28 days due to days to respond being lost in the post, and people generally not having enough time to respond. One consultee also suggested that all amendments to schemes are consulted on, not just ones which the case officer consider necessary to consult on. Regarding the first point, we responded by stating that this is something that can be discussed but is beyond the scope of the SCI at present due to more thought being needed to be put into it and the resource and cost implications that would result from such a change. Regarding the second point, we stated that case officer's cannot consult on every change as there are limitations in terms of resources and that it must also balance ensuring community involvement with not unnecessarily delaying schemes. It was stated that planning officer's use their planning experience and judgement to determine what is a significant change to a scheme.
16. Other important points which were outside of the scope of the SCI were raised by consultees, as is evident in Appendix A, and these will be discussed internally.

## CORPORATE CONSIDERATIONS

### Corporate Finance

Corporate Finance has reviewed the report and concur with the financial implications set out above, that there are no direct financial implications associated with the recommendations in this report.

### Legal

The Borough Solicitor confirms that the legal implications are included in the body of the report.

## BACKGROUND PAPERS

[Cabinet report and decision – 17 June 2021](#)

This page is intentionally left blank

## Statement of Community Involvement (SCI) Summer 2021 Public Consultation Responses - Summary

Individual or Organisation	Organisation name	Summary of response	LBH Officer Comments
Individual	n/a	Regarding paragraph 5.2.2 on the production of conservation area appraisals and management plans, the individual suggested consultation with residents associations be made an obligation.	Agree that the wording should be changed to state that community engagement will take place, rather than may take place. The extent of engagement however should be proportionate to what is being proposed and this will be made clear in the text.
Individual	n/a	Regarding the planning application process outlined in paragraph 6.8.1, the individual suggested that all changes to the application should be communicated to anyone who has objected/commented, and not just those thought to be substantive, with a further period to make further objections/comments.  The individual also suggested putting comments on the portal for all to see.	While it is appreciated that communities would want an opportunity to comment on any and all changes to a proposed scheme, planning officers' must use their planning judgement to resconsult only if those changes that could have a potentially significant effect. The Council needs to be mindful of ensuring communities have an opportunity to be involved in the planning process, but also of not unnecessarily delaying the planning process. Planning officers would use their planning experience and knowledge to determine what amendments to a scheme require resconsultation.
Organisation	Ickenham Residents Association	Pleased that LBH has undertaken this update of the statement of community involvement. We are pleased to see the continuing focus on the involvement of community groups but are concerned that LBH have not set out any policies on how to specifically increase the range of community groups it engages with or to set out any policies on measuring the effectiveness of community engagement. Doing so would hopefully increase the range of views expressed on planning matters and give local people an opportunity to give feedback on the quality and quantity of engagement facilitated by LBH.	Your concerns are noted and it can be made clearer in the document how the Council intends to reach a wider range of people. On measuring the effectiveness of community engagement, this would be achieved through monitoring the number and range of responses received.

Organisation Ickenham Residents Association

Further concerns about the lack of detail in the draft SCI on the tools and techniques that LBH expect to use to deliver community engagement.

While some details have been given (outlined in figure 3), the Council intends to use a range of methods and retain some flexibility on how it consults so that it can use the most appropriate methods for the type of document being consulted on. The Council is committed to maximising community engagement and intends to use a case-by-case approach to achieve this.

The SCI was purposely worded this way to allow the Council flexibility to try alternative approaches depending on the circumstances and the type and effect of documents being consulted on, however, figure 3 does outline the various methods the Council will use to engage with the community. It is understood however that some of the wording could be strengthened to show more clearly the Council's commitment to positively engaging with communities.

<p>Organisation Ickenham Residents Association</p>	<p>para 2.6.3 states: “during the preparation phase the Council may undertake some informal consultation.” It would be helpful to know what is intended. A “may consult” policy do not provide the certainty that communities and other interested parties need.</p>	<p>Agree that the wording should be changed to state that community engagement will take place, rather than may take place.</p>
--	--	---

The SCI was purposely worded this way to allow the Council flexibility to try alternative approaches depending on the circumstances and the type and effect of documents being consulted on, however, figure 3 does outline the various methods the Council will use to engage with the community. It is understood however that some of the wording could be strengthened to show more clearly the Council’s commitment to positively engaging with communities.

<p>Organisation Ickenham Residents Association</p>	<p>Para 2.6.6 states: “At this stage we can supplement the written consultations with a number of meetings and workshops and with face to face opportunities to explore the issues in real depth.” Again , It would be helpful to know what is intended. LBH should set out what “will” be done, rather than what “can” be done.</p>	<p>While some details have been given (outlined in figure 3), the Council intends to use a range of methods and retain some flexibility on how it consults so that it can use the most appropriate methods for the type of document being consulted on. The Council is committed to maximising community engagement and intends to use a case-by-case approach to achieve this.</p>
--	--	---

Organisation	Ickenham Residents' Association	Para 2.6.9 states “This is the last opportunity for the Council to make significant changes to the content of the Local Plan”. Is this really the case? Surely LBH have the flexibility to make significant changes later in the process if this is needed?	The most significant issues with the Local Plan should be addressed at this stage as the next stage is focused on refining and finalising policies before submission to the Secretary of State for examination. While it is possible to make further changes later, paragraph 2.6.9 is highlighting the fact that it is more difficult to make significant changes later in the plan-making process and that the Council is focused on addressing all issues with the Local Plan as early as possible. This will be made clearer in the text.
--------------	---------------------------------	---	---

Organisation	Eastcote Residents' Association	<p>On page 27 it states ‘we encourage residents and businesses to check our weekly list of received applications here <a href="https://planning.hillingdon.gov.uk/OcellaWeb/planningSearch">https://planning.hillingdon.gov.uk/OcellaWeb/planningSearch</a>.</p> <p>Currently, there is a weekly list which is emailed to us each week, as local associations. If a widely available website version is envisaged, it would seem to be a good way for residents to learn about planning applications in their area - we would be in favour of it, unless GDPR/other issues prevent it.</p> <p>We must add, though, that at the moment the above link does not take you to such a weekly list but rather to the LBH general application search page. This does not help residents unless they know already what they want to search for, eg a specific address (see also website links below).</p>	It is agreed that the link does not generate a weekly list and the website text as it is confuses matters. There is an element of self service required to generate the weekly list, however, as you mentioned it is not helpful unless you know what you are looking for. The Council will look into amending the website text and also the SCI text to make it clearer.
Organisation	Eastcote Residents' Association	<p>Page 29 states, in the bottom bullet point, that ‘Comments received will be put on the website’ (personal details will be redacted). If these are for all to view during the consultation/assessment process, this would be a new offering. Again, it is one that we would see as a positive addition.</p> <p>Currently, such comments (with personal information redacted) only appear in the Case Officer’s final report. This process is detailed on Page 30, suggesting the one detailed on Page 29 is an addition, provided earlier, before determination.</p>	This is noted. Due to an oversight this was included despite not being possible at present due to GDPR and resourcing issues. The current practice will continue for the time being. The SCI will be amended to reflect this.



<p>Organisation</p>	<p>Eastcote Residents' Association</p>	<p>We appreciate the work that the Council does to ensure real and meaningful consultation, that LBH goes beyond statutory requirements, where possible, and the various methods that might be used are stated in this SCI.</p> <p>However, the reality, particularly highlighted in these COVID times, is that residents cannot expect any specific communication(s) in all cases. The very different ways which are deemed as acceptable can mean that even immediate residents are not actually informed. If a posted/emailed notification is not used, a notice on a lamp post can be removed before it is seen and details on the LBH website are only useful if you know something has been posted and where to look for it.</p> <p>This brings us back to the weekly list above – it would go some way to ensuring residents are able to see an application near them, assuming the availability of this tool is widely advertised.</p>	<p>Your concerns are noted and the Council will look into how communications are handled from a practice point of view.</p>
<p>Organisation</p>	<p>Eastcote Residents' Association</p>	<p>The examples we give here are just that and not intended to be an exhaustive trawl though the document.</p> <ul style="list-style-type: none"> <li>•We would suggest that there are places where references to additional sources of information would be helpful, taking you to the precise website pages. For example:-             <ul style="list-style-type: none"> <li>oLocal Plan and SDP documents on the LBH website</li> <li>oCIL, Pages 20/21 – the appropriate pages on the LBH website.</li> <li>oWebsite heading in Table 1, Page 26 – link to LBH planning search page?</li> <li>oMaterial Considerations, Page 32 – if these are examples, where can the full details on material considerations be found?</li> </ul> </li> <li>•We note that website details in a couple of cases do not take you to the correct, relevant place:-             <ul style="list-style-type: none"> <li>oWeekly list as detailed above.</li> <li>oLondon Borough of Hillingdon- Planning committees, Page 30 – this takes you to the old North, South/Central, Major Applications website, not the new Minor/Major Applications Committees.</li> </ul> </li> </ul>	<p>This is very helpful and the SCI will be amended to include some of the suggested links.</p>

Organisation	Eastcote Residents' Association	<p>Licencing Applications</p> <p>We appreciate that currently this is treated separately from Planning Applications and thus is not part of this SCI.</p> <p>We are raising the issue because we feel that it should be integrated within the Planning process such that relevant conditions can be included in the approval of a relevant application. Also, we ask that Licencing applications should be sent out for consultation, at least to relevant community organisations, such as ours, if not to the wider general public.</p>	<p>We understand your thinking however Licencing and Planning are two statutorily different systems. This does however raise the point that communication between licencing and planning teams could be improved. Your point regarding the consultation on licencing applications will also be passed on to the Licencing team.</p>
Organisation	Eastcote Residents' Association	<p>Regarding pre-application advice from the Council, where such advice has been provided, we would support the Council including their pre-application advice report as part of the application documentation posted on the LBH website.</p>	<p>Noted, however pre-application services are offered confidentially and the reports cannot be made public.</p>
Individual	n/a	<p>Regarding para 1.3.2 The Council should commit to refining its database of those individuals, groups, businesses etc. in order to deliver the “everyone in the community to take up the opportunity to be actively involved ...” ambition. It has been suggested that the database does not have the comprehensiveness or operational abilities to support this ambition. There ought to be a place in the SCI clearly explaining where to go to register one’s interest in being actively involved in the opportunities afforded by the planning system, to provide the necessary level of information that will make both broad brush and targeted notifications/consultations possible as appropriate.</p>	<p>Noted. The Council can look into making it clearer how to sign up to the consultation database.</p>
Individual	n/a	<p>Re Planning Policy documents and relationships with national and London-wide policy &amp; guidance, whilst I appreciate that ‘conform’ is a simple way of expressing this, you have later used “take account of” which seems to better embrace the official language of ‘general conformity’, ‘consistent with’ and ‘have regard to’.</p>	<p>Noted.</p>
Individual	n/a	<p>Regarding para 1.6.1 The conventional referencing of NPPG is to at least identify which PPG ‘Category’ – in this case ‘Plan-making’ (ID 61 etc). However, this PPG para does not yet cross reference to ‘Consultations and pre-decision matters’ Category para 047 Reference ID: 15-047-20210719.</p>	<p>Noted. The referencing of NPPG paragraphs will be made clearer.</p>
Individual	n/a	<p>Regarding para 1.7.3 There is an active ‘Planning Aid for London’ now – see <a href="https://planningaidforlondon.org.uk/">https://planningaidforlondon.org.uk/</a></p>	<p>Noted. The link will be amended.</p>

Individual	n/a	Regarding para 1.8.1, refer to para 7.1 on more accurate (regulatory) requirements to review SCIs every 5 years	Noted. Para 1.8.1 will be amended to reflect this.
Individual	n/a	Regarding para 1.8.2 Some good practice includes the Lake District Park Authority's Local Plan consultation's use of social media, GLA/LB Newham's Royal Docks community engagement programme and LB Brent's EqIA on changes to planning governance arrangements. Also, there was the pre-pandemic LB Croydon's Urban Room as best practice for youth engagement.	Noted.
Individual	n/a	<p>The following comments will also apply to the Development Management section and elsewhere.</p> <p>Events: From my experience across London, on-line activities seem to be well thought through, but it is those without internet access that is of more concern. So far, during Covid, experience has demonstrated that meetings which are assemblies of people who previously knew one another pre-Covid can work well on-line, although there is a learning process to using this appropriately.</p> <p>Indeed there are advantages to on-line participation, allowing those with personal circumstances or other commitments to join in. HEAR, the London voluntary and community sector's pan-equalities and human rights network, has contributed to comments on another consultation that I have sight of: that there is an advantage to keeping this option post-Covid as an adjunct to any public event to enable the less mobile to participate so long as it is done properly to avoid further exclusion. To this I would add that some webinar systems can offer subtitles and that the 'Chat' and 'Question' functions allow additional communication to those with 'quieter voices' when an on-line meeting is being dominated by those with 'loud voices'.</p> <p>But there are concerns that those who have not previously worked with other attendees or the Council may be reluctant to join in the discussion. Again, it is apparent that even those well acquainted with internet access may dislike using 'Zoom' or equivalent. Anecdotally, 'Zoom' may be better suited to younger persons or those with an office type history of employment which marginalises older persons or those with, say, manual type employment history.</p>	Noted

Individual	n/a	Publicising consultations: The continuation of more traditional lines of communication, if safe to do so, is supported. Keeping open the use of multiple channels of communication whilst seemingly to be a 'scatter-gun' or over-kill approach does have the advantage of ensuring deeper coverage and reach and can have a cumulative or reinforcing effect on recipients.	Noted.
Individual	n/a	Those without internet access: As noted above this raises concerns – ones that are difficult to deal with under the prevailing circumstances. I have asked my colleagues in various community networks across London for examples of good practice that could be recommended, but none to date have been forwarded to me. No doubt we will be returning to this aspect of community involvement again as research and searches continue.	Noted. The Council has sought to make clear that it will use alternative approaches where appropriate and not limit itself to set procedures, other than those that are statutorily required.
		Given the scale and diversity of the potential targets for community involvement, together with other features of local life circumstances, including a variety of languages and cultures, effective outreaching in these pandemic times is proving difficult for all – authorities, developers and community networks. In a sense there is an added barrier to democratic engagement with as of yet insufficient solutions. We need to recognise these limitations, keep them under review and correct them if remedies emerge. That the Council states it has an 'openness' and willingness to entertain new approaches that address these issues would be welcomed as something to be explicitly expressed in the SCI.	
Individual	n/a	Regarding para 2.5.8. - This paragraph raises expectations regarding the Preparation stage not just Regulation 18 stage. It is correct to do so since the Neighbourhood Planning Act 2017 and The Neighbourhood Planning Act 2017 (Commencement No. 3) Regulations 2018 , by amending Section 18 of the Planning & Compulsory Act 2004, now requires the SCI to address the (now additional) Sections 13 & 15 of the P&CPA 2004. As I understand this, there is an expectation that the SCI should set out how the Council is engaging communities and stakeholders in the preliminary stage of plan-making. However, the following sub sections on Preparation and Preferred Options (Regulation 18) do not fulfil this to the degree necessary.	Noted. It is considered that the SCI as a whole meets this requirement.

Individual	n/a	<p>2.6.3 Contrary to the above cited legislation, the Council is proposing only to “may undertake some informal consultation”, a much lesser degree of engagement than that proposed for the Regulation 18 stage. Opportunities for involvement at the early formative stage are stressed in current national policy &amp; guidance, the new London Plan 2021 and in the White Paper on Planning Reform. As NPPF 2021 para 16 c) says: “plans should c) be shaped by early, proportionate and effective engagement between plan- makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees”. Fuller, deeper and wider opportunities for engagement should be set out for the Preparation stage as for the Regulation 18 stage.</p>	<p>This is noted. The SCI will be amended to make clearer what will be done rather than what may be done. It will also be made clearer that the methods used are those identified in figure 3.</p>
Individual	n/a	<p>It is not till 2.6.7 that this paragraph under the Regulation 18 stage first mentions the Integrated Impact Assessment (IIA). It is only here, at this stage, that the (draft) IIA is first revealed to the public. The IIA, by definition, includes Sustainability Appraisal (SA) and Strategic Environmental Assessments (SEA). The environmental report accompanying the draft plan has to address the requirements of the EU Directive 2001/42/EC. In critiquing the adequacy of engagement at the Preparation stage, it is relevant to observe that ODPM guidance ‘A Practical Guide to the Strategic Environmental Assessment Directive’ (Appendix 6, p69) on developing and assessing alternatives states: “Stakeholders may usefully be involved in the generation [my emphasis]and assessment of both strategic and more detailed alternatives through consultation. Demonstrating that there are choices to be made is an effective way of engaging stakeholders in the process.” Consequently, your sentence “the focus will be on identifying issues and options in relation to emerging evidence” at this first stage of plan-making, namely Preparation, would be most usefully the subject of public engagement of the degree proposed for Regulation 18 stage.</p>	<p>The SCI will be amended to make clearer that the IIA scoping report will be consulted on at an early stage and the IIA consulted on at later stages of plan-making too.</p>
Individual	n/a	<p>Turning now to the production of the SEA, close reading of still relevant Government Guidance and the EU Directive for assessments has generated my analysis that the required and recommended involvement of the public should occur at the early formative stages. (This is one of the basic requirements for a fair consultation endorsed by the Supreme Court). Public involvement is useful at Stage A, and ought to happen at Stages B and C. The ODPM guidance on p10 applying EU Directive Article 6.1 &amp; 6.2 explains that the public shall be given an early and effective opportunity ... to express their opinion on the drafts... at both Stages B and D.</p>	<p>Noted. See above.</p>

Individual	n/a	However, it is on Stage A, “Setting the context and objectives, establishing the baseline and deciding on the scope”, that I wish to draw your attention to. The ODPM guidance says: “Responsible Authorities need to consider what information they already have and what more they will need. They may already hold useful information, for example from environmental assessments of previous plans or programmes. It may be useful to consult the public at this stage to seek additional information and initial opinions” (p26) And Appendix 3 says: “Other consultees, including representative bodies and members of the public, who often have a wealth of knowledge and understanding of the strategy or plan area, e.g. local conservation groups”. All this I advance to support my argument that the Preparation stage of the SCI proposes engagement, preferably comparable to, or at least approaching the degree of, that proposed for Regulation 18.	Noted
Individual	n/a	3.1.1 Neighbourhood Plans are ‘made’ which you could better explain as ‘made (adopted)’. This also appears elsewhere as at para 3.3.1	Noted. SCI will be amended to reflect this.
Individual	n/a	3.1.1 Typo – no apostrophe: “Once made (that is adopted) neighbourhood plans are...”	Noted.
Individual	n/a	3.1.2 “At the submission stage the Council will take a lead on finalising the plan.” Whilst it certainly takes a lead in procedural/administrative matters, ‘finalising’ here suggests that the Council fulfils the roles of the Examiner and/or plan-maker. Please rephrase.	Noted. SCI will be amended to reflect this.
Individual	n/a	I am doubtful that this section on Council Support, with its use of such loose phrases as “generally speaking”, adequately describes the setting out of the Council’s policy as required by The Neighbourhood Planning Act 2017 (Commencement No. 3) Regulations 2018 UK SI 2018 No. 38: Regulation 4(a) brings into force section 6 of the Act. Section 6 amends section 18 of the 2004 Act to require a local planning authority to set out their policy for discharging the duty to give advice or assistance to qualifying bodies to facilitate proposals for neighbourhood development plans (including proposals for the modification of neighbourhood development plans) or orders.	Noted.

Individual	n/a	3.4.2 The GDPR is certainly an obstacle (as a protection) to the dissemination of contact details. Therefore, I would ask that in properly setting out the Council's policy, you would commit to utilising the Council's communications & engagement systems (including contact databases) to raise awareness and assist with the consultations that are required through the neighbourhood planning process.	
Individual	n/a	4.1.1 CIL is levied on developments rather than developers.	Noted.
Individual	n/a	<p>Whilst the SCI explains CIL only in terms of the stages of preparation to adoption, it does not explain the opportunities for community involvement in the investment of its proceeds. To omit this is a significant omission. To hive off information on this to another document or later would diminish the purpose and role of the SCI in setting out how the Council involves community in planning.</p> <p>The Council should commit to engaging with the local community to agree with them how best to spend the 'neighbourhood portion' of the levy. The neighbourhood portion is made up of 15% of the overall CIL levy charged on development (subject to capping). However, where a development is granted planning permission within the boundary of a made neighbourhood plan the neighbourhood portion would be 25%. Furthermore, the neighbourhood portion of CIL can be spent on a wider range of projects than the remainder of CIL provided that it is demonstrated that they support the development of the area. Both CIL and planning obligations are now an important part of plan-making and its delivery of sustainable development. These are significant features that should be brought to greater public attention and for the Council to proactively seek to involve them in these opportunities.</p> <p>Monitoring and reporting on CIL and planning obligations is now through the preparation of Infrastructure Funding Statements published at least annually (in addition to the Council's good practice of periodic and regular Section 106 reports to Committee/Cabinet). As national planning guidance explains: "Why is reporting on developer contributions important? Reporting on developer contributions helps local communities and developers see how contributions have been spent and understand what future funds will be spent on, ensuring a transparent and accountable system"(PPG category CIL para172 Reference ID: 25-172-20190901).The Council should commit to raising awareness of the benefits of these planning mechanisms by referencing them in the SCI as outlined above.</p>	Your concern is noted.

Individual	n/a	<p>The aim of the SCI at para 1.3.1's 5th bullet point is to ensure that all sectors of the community can put forward their ideas of (sic – probably should read 'or') views about issues... . I cannot find a specific place in this SCI that would direct and enable me and others to put forward ideas or views that are other than responding to planning applications or to plan-making proposals that are being consulted on by the Council. For example, having been prompted by the latest iterations of the NPPF and PPG, how and where should I ask the Council to bring forward Article 4 Directions that protect the primary shopping frontages/cores of the borough's town centres to protect their vitality and viability in the face of 'Class E permitted development' consequences.</p> <p>The point here is not one about the appropriateness of Article 4 – I could have used the example of preparing for biodiversity net gain/off setting etc. Whatever I use as an example of an idea/view, I am asking where in the SCI one "can put forward ideas or views on matters" (other responding to planning applications or plan-making) "and feel confident that there is a a formal process for considering these" (as you write). You have proposed this to be part of the aim of the SCI, therefore, you ought to specify the way/provide signposts on how this will happen.</p>	<p>Noted however there is nothing stopping an individual contacting the Council's planning teams using the contact details provided in the 'Contact sheet'. All queries we receive are taken seriously and properly investigated. What can be done however is make it clearer how to contact the Council.</p>
Individual	n/a	<p>5.2.2 In 2014-15 the Council did enable local communities to co-produce several Conservation Area Character Appraisals and it would be beneficial if this good or best practice continued.</p>	Noted.
Individual	n/a	<p>That a commitment to publish pre-application advice at the time of originating and not wait till an application has been submitted should be stated here. I believe that, for example, the Royal Borough of Kensington &amp; Chelsea does this as a general rule. There is considered advice, particularly on the inter-related matters of transparency and increasing public opportunities for reasonable democratic scrutiny and accountability of the development management process. The 10 Commitments document of January 2014 was published by the Local Government Association and the British Property Federation with endorsements from other significant parties. Commitment 9 (p18), from my reading, advises that there should be a presumption for pre-application stage discussions to be open to all, and that confidentiality has to be justified, particularly in light of the Freedom of Information Act 2004 and the Environmental Regulations 2004. This openness should prevail when commercial confidentiality does not figure.</p>	<p>The Council offer pre-application advice as a confidential service.</p>



Individual	n/a	<p>Note also that Commitment 10 advises that all involved in pre-application engagement should maintain an agreed record of information etc. Therefore, it ought to be incumbent on the Council to keep and maintain proper records of meetings and so forth.</p> <p>These Commitments were then further evolved by the Local Government Association and Planning Advisory Service in June 2014. Whilst section 4 sets out the merits of actively engaging communities at the earliest stages of development, it is to Section 2 I wish to draw your attention to, in particularly the part on 'Confidentiality' (p10). Once again it references the Fol Act and EIRegs, in conveying the message that the default position is one of open disclosure. Only if the prospective applicant requests confidentiality should the authority consider this request.</p> <p>In light of the above the Council should set out here a procedural policy of open disclosure and state that any request for confidentiality is treated on a case by case basis.</p>	Noted.
Individual	n/a	<p>6.7.3 It has been indicated by another that Weekly Lists are no longer available and that this webpage link does not work. Please clarify.</p>	See response in row 10.
Individual	n/a	<p>6.8.1 &amp; Table 2 (or possibly 6.10 Viewing and Commenting on a Planning Application) The SCI is silent on what information is available to consultees. Two important subjects are Viability Assessments and Planning Obligations, both of which are not usually available when during the prescribed statutory periods of consultation. Without these a full and proper response often cannot be made.</p> <p>For viability assessments the onus is on full disclosure and any redacted parts should be fully justified. PPG Viability para 10 says "This National Planning Guidance sets out the government's recommended approach to viability assessment for planning. The approach supports accountability for communities by enabling them to understand the key inputs to and outcomes of viability assessment". It goes on to say more about transparency. [Reference ID: 10-010-20180724]. The Council should commit to this degree of disclosure and availability in this SCI.</p>	This is beyond the remit of the SCI at present, however the Council will take this on board and explore how transparency can be improved.

Individual	n/a	<p>For planning obligations (S106), the draft heads of terms should be disclosed sufficiently early on in the process to allow local communities to influence what is required to mitigate the impact of a development. After all they have the lived experiences of living and/or working, accessing services etc. within the vicinity of a development proposal and understand the prevailing pressures or opportunities. The Town &amp; Country Planning (Development Management Procedures)(England) Order 2015 No.595 Article 40(3)b requires proposed planning obligations be entered into Part 1 of the Planning Register. Simply publishing the Heads of Terms along with the Officer report to the Planning Committee a week/5 days before meeting is not good enough. For this denies the community being able offer their insights, knowledge and experience at a sufficiently earlier enough stage to be able to influence the outcome and is not in accordance with the cited Regulations.</p>	<p>Your concern is noted and the Council will look into what can be done about this.</p>
Individual	n/a	<p>It would be helpful to bear in mind, as Covid related restrictions wax and wane, that potential respondents may have difficulties in meeting conventional consultation periods. Prospective applicants with their pre-application consultations could be reminded of this.</p>	<p>Noted. We will bear this in mind.</p>
Individual	n/a	<p>A commitment to structured monitoring and assessment as to whether the aims and envisaged outcomes (your paras 1.3.1 &amp;1.3.2) are being achieved should be explicitly set out here. Reliance on the Council's own review and the taking on board of 'feedback' is insufficient. The 'feedback' needs to be proactively sought, analysed and the analysis published and available for scrutiny.</p> <p>It is important for the Council to assess the effectiveness of the SCI and to monitor the success rates of the various methods/approaches being used through periodic tracking of views and experiences of a representative survey group of residents, community groups and businesses. This is made all the more important as we move permanently to more on-line consultations, the digitisation of the planning process and the promised planning reform of the planning system. Even now not all potential persons or organisations are comfortable or are able to cope with the move to on-line processes. Furthermore, in order to ensure that the engagement is truly inclusive, effective and maximised (your phrase) those 'whose voices are seldom heard' in the planning process ought to be positively approached and asked for their 'feedback' on how to better outreach and engage.</p> <p>The points raised here under this Section have general relevance to other parts of the SCI.</p>	<p>The Council will look into how it can integrate a structured monitoring framework into the SCI in the next review.</p>

Individual	n/a	Regarding the glossary, AMR: write “Authority Monitoring Report (AMR): ...previously known as Annual Monitoring Reports...” rather than start with Annual Monitoring Report.	Noted.
Individual	n/a	Regarding the contact sheet, this is useful. Without wishing to detract from clarity, perhaps, add the web page links for such well used functions as ‘Planning Search’, ‘Planning Committees’.	Noted. SCI will be amended to reflect this.
Organisation	Gatehill Residents' Association	Regarding section 2.4 - As officers who are assessing the applications have 8 or 13 weeks from date of validation to determine the application, it would be useful for an extra 7 days to be added to the consultation period (21 days to 28 days) to recognise that neighbours, local residents and businesses also have to work under different circumstances in the event of future social distancing, for example some residents are unable to access information due to libraries being closed.	The Council has generally been flexible on it's consultation period during the pandemic to take account of these issues and it is agreed that in the event of future social distancing measures, similar flexibility could be applied. How this flexibility should be applied however should be done on a case by case basis, in the Council's opinion.
Organisation	Gatehill Residents' Association	Regarding section 2.5.7 - We welcome the Council's intention to actively engage the community and other key stakeholders in the plan-making process. The document does not say how the Council intends to carry this out. More importantly, if the Council wishes to actively engage the community it needs to pledge to place weight on the local community's views and not to be swayed by property developers who are solely motivated by profits. If the local community's views carry little weight, then the local community will disengage with the process or increase its complaints. The Council should also be aware that neighbours assume that the Council will check the accuracy of 'facts' and apply planning policy in a consistent manner. They are not aware that their silence will be taken as agreement with the proposals. Neighbours are also concerned that any negative comments from them will be considered as a 'dispute' to be raised should they wish to sell their property at a later date. There is an increasing number of threats to neighbours who raise objections and most residents do not wish to be on bad terms with their neighbours.	Noted. The SCI will be amended to state more clearly when it intends to go beyond the statutory consultation requirements. The SCI was purposely worded this way to allow the Council flexibility to try alternative approaches depending on the circumstances and the type and effect of documents being consulted on, however, figure 3 does outline the various methods the Council will use to engage with the community. It is understood however that some of the wording could be strengthened to show more clearly the Council's commitment to positively engaging with communities.  Regarding your other concerns, this is beyond the remit of the SCI however the Council will explore outside of the SCI how it can tackle these issues.

Organisation	Gatehill Residents' Association	Regarding section 6.3.1 - Box 6 of the process refers to the drafting of a report by the case officer. If the application is to be decided by a Planning Committee Meeting rather than by delegated powers, at the moment, this report is made available to applicants and objectors one week before the application is to be heard (box 7). The report has to be submitted to Democratic Services at least one week before its publication by the case officer so it would be helpful if a copy was sent to the applicant and objectors contemporaneously.	Noted
Organisation	Gatehill Residents' Association	Regarding section 6.5 - This section appears only to apply to major applications. The Council should consider how it could ensure that applicants of minor applications could undertake consultations with their neighbours and residents' associations and how this could be evidenced.	Pre-application consultation by applicants is encouraged rather than mandatory. It's usefulness is highlighted in section 6.5. This section does not apply to only major applications however it is stated that level of engagement encouraged will depend on the scale of development proposed.
Organisation	Gatehill Residents' Association	Regarding section 6.7 - The Council is seeking to continue with its minimum statutory 21-day consultation which is disappointing and we suggest that this is extended to the 28 days which was the timescale previously set when site notices were erected. Reasons - (i) Current practise of posting neighbour letters by second class post reduces actual the time for the consultation by up to 7 days. (ii) Neighbours are rarely planners, are often engaged in fulltime employment, have family commitments or occasionally go away on holiday, there is very little time for them to track down plans, understand them and then write a letter to officers to raise material objections. (iii) The 21-day period does not take into account Bank Holidays or religious festivals.	Noted. The Council will review this issue. This is something that can be discussed but is beyond the scope of the SCI at present due to more thought being needed to be put into it and the resource and cost implications that would result from such a change. If necessary the Council will conduct an earlier review of the SCI.

Organisation	Gatehill Residents' Association	<p>Regarding section 6.8.1 - We note the intention only to reconsult if the Council considers that 'substantive' new issues are proposed. This is also the current situation. It would be better if objectors were routinely reconsulted so that objections or petitions could be withdrawn if plans have been amended in such a way that their reason for objecting had been addressed. This would save the officers' time and speed up the decision-making process.</p> <p>It would be better to reconsult direct neighbours on all amendments to avoid officers making errors due to a lack of accurate information of the relative position of neighbouring properties. For example, a 'minor' amendment to the location of a side facing window was proposed by the applicant. The neighbour was not advised. The plans were approved and the neighbour's private seating area in the rear garden became overlooked by the relocated window. The neighbours would have objected if they had been aware of the proposed change. You can imagine the bad feeling which has arisen.</p> <p>If the Council does not intend to routinely reconsult it must clearly state in the notice to consultees that they will not be reconsulting and advise consultees to check the Council's website regularly to look out for amendments to plans and any additional documents.</p>	<p>While it is appreciated that communities would want an opportunity to comment on any and all changes to a proposed scheme, planning officers' must use their planning judgement to reconsult only if those changes that could have a potentially significant effect. The Council needs to be mindful of ensuring communities have an opportunity to be involved in the planning process, but also of not unnecessarily delaying the planning process. It must also be mindful of resource implications. Planning officers would use their planning experience and knowledge to determine what amendments to a scheme require reconsultation.</p>
Organisation	Gatehill Residents' Association	<p>Regarding the Planning Application procedure table on page 29 - This proposal would bring Hillingdon into line with most other LPAs. Those wishing to make comments must be advised that their comments will be made available on the Council's website. Currently, the Council makes the personal details of those making comments available to applicants so I trust that this practise will cease as it clearly, because of a natural desire to preserve neighbourliness, acts as a barrier to honest objections.</p>	<p>This is noted. Due to an oversight this provision was included despite not being possible at present due to GDPR and resourcing issues. The current practice will continue for the time being, with details of comments made being summarised in the Officer's Report and anonymised rather than being published on the website.</p>

Organisation	Gatehill Residents' Association	<p>Regarding the Planning Application procedure table on page 31 - I understood that objectors had the right to appeal to the High Court if they believe that the Council had made procedural errors. Has this right been removed? If not, it should be included in Table 2.</p> <p>The lack of right of appeal for objectors raises the importance of officers taking the comments from objectors seriously. Rarely does the officer seek evidence from either the applicant or the objector when 'facts' are in dispute. Once permission has been granted, rarely does the Council use its powers to invalidate the permission due to the applicant misleading the council. Applicants should be advised at time of making the application that their planning consent will be invalid if they have supplied the Council with misleading or inaccurate information.</p>	A link to a guide to the planning appeal process which will advise on what you have mentioned can be included in the SCI.
Organisation	Gatehill Residents' Association	<p>Regarding section 6.9 - In the event of social distancing, the council is proposing to accept dated photos from the applicant. I do not agree with this. Surely, by their very nature, extensions, alterations and development work takes place outdoors. Officers must view the site in person. If an applicant refuses to allow an officer to view the site in person the application should be put on hold until the site can be visited by the officer. Photographs are frequently misleading and can give a false impression. If the Council decides to rely on photographs from the applicant, the photographs should be put on the Council's website so that neighbours can see whether the photographs are misleading.</p>	Officers will always view the site if it is safe to do so. Paragraph 6.9.3 suggests alternative arrangements only where the Council considers it appropriate.
Organisation	Gatehill Residents' Association	<p>Regarding section 6.10 - The right to raise objections is an absolute right. We are experiencing an increasing number of threats and attempts to intimidate by applicants. If the Council is serious in wishing greater involvement from the local community, it must take steps to advise applicants in writing that objectors have the absolute right to comment on their planning application.</p>	Your concern is noted. It is considered that paragraph 6.10.1 makes it clear that anyone can comment on a planning application.

Organisation	Gatehill Residents' Association	<p>Regarding section 6.11 - The list of examples of material objections is helpful, figure 10. It does however include the following line in the first example 'This can also include emerging plans that have been through at least one round of public consultation'.</p> <p>Previously, when we have raised objections pointing out that proposed plans do not conform with emerging policy, even policy which has been considered acceptable by the Inspector but not yet adopted by the full Council, officers have stated to members at a North Planning Committee meeting that if the application is refused and the applicant appeals then the Inspector will likely approve the application as the new policy has not yet been formally adopted. The specific example can be provided if you would like further information.</p>	<p>This is noted and it will be useful to discuss this however that emerging plans that have been through a round of consultation are a material consideration is factually correct. The weight given to it however will depend on a number of things.</p>
Organisation	Gatehill Residents' Association	<p>Regarding para 6.12.2 on appeals - A sentence could be added in here advising objectors that they may also submit further information to the Inspectorate.</p>	<p>Noted. The SCI can be amended to include a guide to the appeals process.</p>
Organisation	Gatehill Residents' Association	<p>Regarding section 6.13.1 on enforcement - As the Council relies heavily on information from residents, and there is an increase in threats from those who are being investigated, a sentence should be added here that the personal information of the person who makes the report will be protected.</p>	<p>Noted. The SCI will be amended to include a guide to the enforcement process, including on questions about anonymity.</p>
Organisation	Gatehill Residents' Association	<p>As we know, everyone has a legal right to object to a Planning Application. We also know that in order for the Application to be considered by the relevant Planning Committee an objection must be backed-up with a Petition signed by at least 20 residents. In the case of an application where there are objections but no petition the system for approving or rejecting is opaque. It is not clear what the internal review procedures consists of and whether there is a check list of possible pitfalls. Objectors such as the Gatehill Residents' Association (GRA) speak for many members, in our case 191 households who elect committee members annually. It would improve the process if an objection from the GRA did not need to be backed-up with a petition, but taken as-read that there is the required level of support for that objection.</p> <p>We at the GRA have been concerned that in two recent cases obvious mistakes have been made in the process of checking an Application and in answers given at a Planning Committee meeting. This highlights the need for more rigorous application by officers of the rules and also points to the need for more training or retraining. Having in these cases raised genuine objections of fact, it would have been helpful in these two cases, and in the future, if the Officer was encouraged to open a dialogue on our objections.</p>	<p>Noted. This is a matter to be discussed separately from the SCI</p>

## APPENDIX A

Organisation	Affinity Water	A general comment on the SCI, advising how Affinity Water wish to be consulted going forward.	Noted.
Organisation	Highways England	A general comment on the SCI, advising how Highways England wish to be consulted going forward.	Noted
Organisation	Highways England	With regards to Local Plan documents, we are interested in the council's approach to highway and transport matters in relation to regeneration and new development. We are keen to understand how local authorities initially identify and prioritise transport improvements in order to deliver sustainable development. Specifically, how local authorities set and implement policy to manage trip demand and ultimately how these might contribute to the safe and efficient operation of the SRN for which we are responsible.	Noted however this is a query not within the scope of the SCI. A separate discussion about this will be arranged.
Organisation	Highways England	With regards to planning applications, we are interested in the potential impact that the development might have on the SRN, and whether there would be any adverse safety implications or material increase in queues and delays on the SRN as a result of development or detrimental environmental visual impact.	Noted. The Council will take this on board however a separate discussion about this will also be arranged.
Organisation	Highways England	We have reviewed the SCI and we are satisfied that the outcome of the consultation will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF2019, particularly paragraphs 108 and 109). Based on this, Highways England does not offer any comments on the consultation at this time.	Noted.
Organisation	Canal and River Trust	The Trust is generally supportive of the Councils production of this SCI which provides clarity on how consultees and stakeholders will be involved in the preparation and review of planning policy documents and consideration of planning applications. As only about 4% of the land adjacent to our waterways is actually owned by the Trust, our waterways are highly vulnerable to the impact of development by others. The ability to influence such developments through the planning and design process is therefore of utmost importance to us.	Noted.



Organisation	Canal and River Trust	<p>On Plan-Making - The Trust is not currently a statutory consultee on planning policy but recognises and values the important role of planning policy in not only protecting our network of canals, rivers and docks from inappropriate development, but also in unlocking the potential of the inland waterway network for the greater benefit of an area and its communities. Our waterways can provide significant benefits in terms of wellbeing and we believe that the formation of planning policy that identifies and includes approaches for promoting access to our network is highly important for helping to realise the positive benefits of our network to local communities.</p> <p>Given the multi-functional nature and varying characteristics of the waterways there is no 'one-size fits all' planning policy and we believe there is a need to strengthen existing planning policy at all spatial levels to provide a robust policy framework that supports canals, rivers and docks as a cross-cutting policy theme. The Trust would therefore wish to be engaged with in the production of those policy documents relevant to its waterways.</p> <p>We welcome reference to the Councils Planning Policy database of interested parties.</p>	Noted. We will ensure the Canal and River Trust are involved in the plan-making process.
Organisation	Canal and River Trust	<p>On Neighbourhood Plans - The Trust is happy to engage with communities working to produce Neighbourhood Plans likely to impact our waterways and has produced its own guide on planning for waterways in Neighbourhood Plans. This has been forwarded to town and parish councils and is available on the Trusts website at: <a href="https://canalrivertrust.org.uk/media/original/32800-planning-for-waterways-in-neighbourhood-plans.pdf">https://canalrivertrust.org.uk/media/original/32800-planning-for-waterways-in-neighbourhood-plans.pdf</a></p> <p>As Neighbourhood Plans are generally produced by local communities it is sometimes the case that we only become aware of such documents at a very late stage in their production once submitted to and consulted on by the local planning authority which is far from ideal. It would be helpful if groups could be given contact details for all relevant consultees and interested stakeholders to assist with early engagement and consultation. The Trust would wish to be included in any such list.</p>	Noted. The Council will ensure this is taken on board for current and future neighbourhood plans.
Organisation	Canal and River Trust	<p>On CIL - It would be helpful if the SCI also included details of how stakeholders will be able to engage with the identification of all projects eligible for CIL funding going forward.</p>	Noted. The Council will expand on this in the SCI.

Organisation	Canal and River Trust	<p>On Development Management - The Trust is a statutory consultee in the development management process and LPAs are required to consult us before making a decision on certain types of planning applications likely to affect our waterways. We note reference to consultation with the various statutory and non-statutory consultees within the SCI.</p> <p>For your information, details of the defined areas where we should be notified of any planning applications likely to affect our waterways can be found at <a href="https://canalrivertrust.org.uk/specialist-teams/planning-and-design/our-statutory-consultee-role/planning-applications/our-notified-area">https://canalrivertrust.org.uk/specialist-teams/planning-and-design/our-statutory-consultee-role/planning-applications/our-notified-area</a></p>	Noted
Organisation	Canal and River Trust	<p>Our waterways are multi-functional assets and as such there are a wide range of matters of potential interest to us. We are more than happy to enter into discussions, with local planning authorities (LPAs) and applicants/developers and positively encourage pre-application discussions so that any issues and potential mitigation can be highlighted early in the planning process. We would be pleased if the SCI could include the following link to the Trusts pre-application process: <a href="https://canalrivertrust.org.uk/specialist-teams/planning-and-design/our-statutory-consultee-role/what-were-interested-in/pre-application-advice">https://canalrivertrust.org.uk/specialist-teams/planning-and-design/our-statutory-consultee-role/what-were-interested-in/pre-application-advice</a></p> <p>As part of this we can also direct applicants to other areas of the Trust for advice in our capacity as landowner such as access and discharges to the waterway.</p>	Noted. While it won't be included in the SCI specifically, the Council can at a later date publish a list of useful contacts to sit alongside the SCI. The Council will need time to come up with a list of useful contacts. In the meantime the Council can advise applicants of the pre-application service of this.
Organisation	Canal and River Trust	<p>The NPPF highlights the benefits of early engagement and states that LPAs have a key role to play in encouraging parties to take maximum advantage of the pre-application stage and should encourage engagement with statutory and no-statutory consultees before submitting their application. We are pleased to note that this is reflected in the SCI.</p>	Noted.
Organisation	Canal and River Trust	<p>We would also welcome the LPA directing applicants to relevant statutory consultees for preapplication advice as part of this process. Paragraph 6.5.1 could be amended to read: Whilst not mandatory, the Council encourages applicants to engage with the owners / occupiers of neighbouring land / premises and wider community, including relevant statutory consultees at the earliest stage of preparing their development proposal (pre-application stage) where it will add value to the process and the outcome.</p>	Agreed.
Organisation	Transport for London	<p>2.1.2 - The London Plan is developed by the Mayor of London. The Greater London Assembly provides input and feedback but it is not responsible for the London Plan</p>	Noted. The SCI will be amended to reflect this

Organisation	Transport for London	2.3.1 - Within London there is no Duty to Cooperate with County Councils but there is a requirement to work with the Mayor of London and Transport for London (See Policy SD2 and paragraph 2.2.7 of the London Plan 2021)	Noted. The SCI will be amended to reflect this
Organisation	Transport for London	2.3.4 - It would be helpful to provide clarity on the relevant organisations and other stakeholders that appear on the list of specific and general consultation bodies and for this list to be included as a table or a separate appendix	Noted. A user-friendly version of this can be published at a later date to sit alongside the SCI.
Organisation	Transport for London	6.3.1 - The two stage requirements for referral of planning applications to the Mayor of London are not fully reflected in figure 8 (More information can be found here <a href="https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/what-powers-does-mayor-have-planning-applications">https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/what-powers-does-mayor-have-planning-applications</a> ).	Noted. The SCI will be amended to reflect this
Organisation	Transport for London	6.7.4 – The list of statutory consultees should include Transport for London in its role as the highways authority for the Transport for London Road Network and as the strategic transport authority with an interest in all applications that are referred to the Mayor or are likely to give rise to transport impacts	Noted.
Organisation	Transport for London	6.8.1 – Table 2 should show how the process of referring applications to the Mayor forms part of the overall application and decision making process	Noted. The SCI will be amended to reflect this
Organisation	Transport for London	6.11.1 – Figure 10 should make it clear that transport issues beyond traffic and highway safety including access, capacity, connectivity, parking and safeguarding are also material considerations	Noted. The SCI will be amended to reflect this
Organisation	CPRE	We believe that plan-making at all levels must be properly open to local engagement and scrutiny. We would welcome any initiatives to engage communities earlier in the plan-making process. One of local stakeholders' greatest frustrations is that crucial components of plans, such as the scale and location of strategic sites for housing and employment, are so advanced by the time of public consultation that, in practice, there is no way to influence them. Thus, consultations often become a box ticking exercise to say they have been carried out but no substantive changes are made, or indeed could be made to the plan presented, as otherwise the whole plan would need to be reassessed	Your concern is noted and it is the aim of this SCI to encourage engagement in the planning process as early as possible in the plan-making process.

Individual	n/a	<p>We're pleased that LBH has undertaken this update of the statement of community involvement. We are also pleased to see the continuing focus on the involvement of community groups but are concerned that LBH have not set out any policies on how to specifically increase the range of community groups it engages with or to set out any policies on measuring the effectiveness of community engagement. Doing so will hopefully increase the range of views expressed on planning matters and give local people an opportunity to give feedback on the quality and quantity of engagement facilitated by LBH.</p>	<p>Your concerns are noted and it can be made clearer in the document how the Council intends to reach a wider range of people. On measuring the effectiveness of community engagement, this would be achieved through monitoring the number and range of responses received.</p>
Individual	n/a	<p>We have further concerns about the lack of detail in the draft SCI on the tools and techniques that LBH expect to use to deliver community engagement.</p>	<p>While some details have been given (outlined in figure 3), the Council intends to use a range of methods and retain some flexibility on how it consults so that it can use the most appropriate methods for the type of document being consulted on. The Council is committed to maximising community engagement and intends to use a case-by-case approach to achieve this.</p> <p>The SCI was purposely worded this way to allow the Council flexibility to try alternative approaches depending on the circumstances and the type and effect of documents being consulted on, however, figure 3 does outline the various methods the Council will use to engage with the community. It is understood however that some of the wording could be strengthened to show more clearly the Council's commitment to positively engaging with communities.</p>

Individual	n/a	para 2.6.3 states: “during the preparation phase the Council may undertake some informal consultation.” It would be helpful to know what is intended. A “may consult” policy do not provide the certainty that communities and other interested parties need.	<p>Agree that the wording should be changed to state that community engagement will take place, rather than may take place.</p> <p>The SCI was purposely worded this way to allow the Council flexibility to try alternative approaches depending on the circumstances and the type and effect of documents being consulted on, however, figure 3 does outline the various methods the Council will use to engage with the community. It is understood however that some of the wording could be strengthened to show more clearly the Council’s commitment to positively engaging with communities.</p>
Individual	n/a	Para 2.6.6 states: “At this stage we can supplement the written consultations with a number of meetings and workshops and with face to face opportunities to explore the issues in real depth.” Again , It would be helpful to know what is intended. LBH should set out what “will” be done, rather than what “can” be done.	While some details have been given (outlined in figure 3), the Council intends to use a range of methods and retain some flexibility on how it consults so that it can use the most appropriate methods for the type of document being consulted on. The Council is committed to maximising community engagement and intends to use a case-by-case approach to achieve this.

Individual	n/a	Para 2.6.9 states “This is the last opportunity for the Council to make significant changes to the content of the Local Plan”. Is this really the case? Surely LBH have the flexibility to make significant changes later in the process if this is needed?	The most significant issues with the Local Plan should be addressed at this stage as the next stage is focused on refining and finalising policies before submission to the Secretary of State for examination. While it is possible to make further changes later, paragraph 2.6.9 is highlighting the fact that it is more difficult to make significant changes later in the plan-making process and that the Council is focused on addressing all issues with the Local Plan as early as possible. This will be made clearer in the text.
------------	-----	---	---



# HILLINGDON

LONDON

## Hillingdon Council

### ~~Draft~~ Revised Statement of Community Involvement

2021



PLANNING POLICY [local.plan@hillington.gov.uk](mailto:local.plan@hillington.gov.uk)

If you would like us to translate information about this project into another language, or require an interpreter, please call 0800 9949323.



<b>1</b>	<b>INTRODUCTION</b>	<b>1</b>
1.1	THE PLANNING SYSTEM	1
1.2	WHAT IS A STATEMENT OF COMMUNITY INVOLVEMENT?	1
1.3	PURPOSE OF THE SCI	1
1.4	WHAT IS THE LOCAL AUTHORITY REQUIRED TO DO?	2
1.5	OPPORTUNITIES FOR INVOLVEMENT IN THE PLANNING SYSTEM	2
1.6	TEMPORARY CHANGES IN RESPONSE TO THE COVID-19 PANDEMIC	3
1.7	PLANNING INFORMATION AND SUPPORT	3
1.8	FUTURE REVIEW	4
<b>2</b>	<b>PLAN-MAKING</b>	<b>5</b>
2.1	WHAT IS PLAN-MAKING?	5
2.2	CONSULTATION METHODS	6
2.3	WHO WILL THE COUNCIL INVOLVE IN THE PLAN-MAKING PROCESS?	7
2.4	TEMPORARY CONSULTATION ARRANGEMENTS IN THE EVENT OF FUTURE SOCIAL DISTANCING	9
2.5	DEVELOPMENT PLAN DOCUMENTS	10
2.6	DEVELOPMENT PLAN DOCUMENT PROCESS	11
2.7	SUPPLEMENTARY PLANNING DOCUMENTS (SPDs)	14
2.8	SPD PROCESS	15
<b>3</b>	<b>NEIGHBOURHOOD PLANS</b>	<b>17</b>
3.1	INTRODUCTION	17
3.2	NEIGHBOURHOOD PLANNING PROCESS	17
3.3	CONSULTATION BY NEIGHBOURHOOD FORUMS	18
3.4	COUNCIL SUPPORT	19
<b>4</b>	<b>COMMUNITY INFRASTRUCTURE LEVY</b>	<b>20</b>
4.1	COMMUNITY INFRASTRUCTURE LEVY (CIL)	20
4.2	CIL PROCESS	20
<b>5</b>	<b>OTHER POLICY GUIDANCE</b>	<b>22</b>
5.1	ARTICLE 4 DIRECTIONS	22
5.2	CONSERVATION AREA APPRAISALS & MANAGEMENT PLANS	22
<b>6</b>	<b>DEVELOPMENT MANAGEMENT</b>	<b>23</b>
6.1	INTRODUCTION	23
6.2	TYPES OF PLANNING APPLICATIONS	23

<u>6.3 SUMMARY OF THE PLANNING APPLICATION PROCESS</u>	<u>24</u>
<u>6.4 PRE-APPLICATION</u>	<u>24</u>
<u>6.5 PRE-APPLICATION CONSULTATION BY APPLICANTS</u>	<u>25</u>
<u>6.6 STATUTORY CONSULTATION REQUIREMENTS FOR THE COUNCIL</u>	<u>26</u>
<u>6.7 WHO WILL THE COUNCIL CONSULT</u>	<u>27</u>
<u>6.8 DETAILED PLANNING APPLICATION PROCESS AND OPPORTUNITIES FOR ENGAGEMENT</u>	<u>28</u>
<u>6.9 CHANGES TO DEVELOPMENT MANGEMENT PROCEDURES IN RESPONSE TO FUTURE SOCIAL DISTANCING</u>	<u>31</u>
<u>6.10 VIEWING AND COMMENTING ON A PLANNING APPLICATION</u>	<u>32</u>
<u>6.11 MATERIAL CONSIDERATIONS</u>	<u>33</u>
<u>6.12 APPEALS</u>	<u>35</u>
<u>6.13 PLANNING ENFORCEMENT</u>	<u>35</u>
<u>7 MONITORING AND REVIEW</u>	<u>36</u>
<u>8 LINKS TO USEFUL RESOURCES AND INFORMATION</u>	<u>37</u>
<u>GLOSSARY</u>	<u>38</u>
<u>CONTACT SHEET</u>	<u>41</u>

# 1 INTRODUCTION

## 1.1 THE PLANNING SYSTEM

1.1.1 The planning system is an important part of our lives and affects us all in some way; from the homes and streets we live in, the places that we work, the location and types of shops that we shop in, as well as the outdoor spaces and natural environment that we spend time relaxing in.

1.1.2 How Hillingdon Council's built environment develops in the future will be led by the planning system. It is therefore important that the local community and stakeholders know how they can take part in the planning process and participate in planning decisions.

1.1.3 Understanding the issues, opportunities, challenges and options is an important part in the plan-making process and engagement and consultation with relevant partners and communities is essential to this.

## 1.2 WHAT IS A STATEMENT OF COMMUNITY INVOLVEMENT?

1.2.1 A Statement of Community Involvement (SCI) sets out how the Council intends to involve all sections of the community in the planning process and engage with local communities, businesses and other interested parties when developing and reviewing planning documents and determining planning applications.

1.2.2 The SCI establishes formal arrangements and standards to enable the community to know how and when they will be involved in the preparation, alterations and review of Hillingdon's Development Plan and how they will be consulted on planning applications.

## 1.3 PURPOSE OF THE SCI

1.3.1 The aim of the SCI is to ensure that all sectors of the community in Hillingdon:

- Are informed about the planning documents being prepared or local planning applications being considered;
- Understand how they can make their views of these known;
- Have ready access to information;
- Are involved early in the decision-making process;
- Can put forward their ideas of views about issues and feel confident that there is a formal process for considering these;
- Can take an active part in preparing proposals or options to manage land use and future development in their community;
- Can comment on planning applications; and
- Will get feedback and be informed about progress and outcomes.

1.3.2 The Council wants to encourage everyone in the community to take up the opportunity to be actively involved in the preparation of the Development Plan and in the consideration of planning applications. The Council firmly believes that community involvement in the planning process can help:

- Develop better plans and achieve higher quality development, which is supported by the local community;
- Improve the quality and efficiency of decisions by drawing on local knowledge and minimising costly and unnecessary conflict;
- Educate all participants about the needs of local communities, the business sector and how local government works;
- Foster ownership and promote social cohesion by making real connections with people in the community and offering them a tangible stake in decision-making;
- Offer different, more locally relevant or practical solutions to resolve contentious or complex issues;
- Promote certainty to both the community and developers as to the type of land use or development desired by the community for certain locations or areas; and
- Achieve consensus in the preparation of the Development Plan.

#### 1.4 WHAT IS THE LOCAL AUTHORITY REQUIRED TO DO?

1.4.1 Section 18 of the Planning and Compulsory Purchase Act 2004 (as amended) requires local authorities to prepare and maintain the Statement of Community Involvement (SCI). An SCI must set out how the Council intends to achieve community involvement, public participation and cooperation in the preparation of their Local Plan, including any Supplementary Planning Documents (SPDs), as well as setting out how they intend to involve the public when consulting on planning applications.

1.4.2 Hillingdon's last SCI was adopted in 2006 and so this SCI will include a number of updates in line with changes in legislation as well as national policy, guidance and best practice. This SCI will also identify opportunities for the use of technology to reach more people and enable more effective engagement.

1.4.3 The SCI has also been updated to take account of temporary changes to consultation practices due to the global Covid-19 pandemic.

#### 1.5 OPPORTUNITIES FOR INVOLVEMENT IN THE PLANNING SYSTEM

1.5.1 There are two main parts to the planning system which the Council seeks to involve partners and communities in:

- **Planning Policy** is concerned with the preparation of local development documents and policies that are used to guide development in Hillingdon. These documents provide information on how the borough will change during the plan making period, which is usually for a minimum of 15 years. They also form the basis for determining planning applications. The documents must conform to relevant Government and London-wide guidance and policy and there are specific statutory procedures that must be followed during the preparation of the documents.
- **Development Management** is responsible for processing and determining planning applications for new development, changes of use for development and also determines

applications in relation to listed buildings, advertisements and works to certain trees where they are covered by a Tree Preservation Order. The Development Management team also provides pre-application planning advice. The **Planning Enforcement** team investigates and where appropriate acts where breaches of planning control have taken place.



Figure 1: Various stages of the planning process

## 1.6 TEMPORARY CHANGES IN RESPONSE TO THE COVID-19 PANDEMIC

1.6.1 The Government published amendments to Town and Country Planning Regulations in May 2020 and again in December 2020. The National Planning Practice Guidance (NPPG) was also updated to include paragraphs [Paragraph: 076 Reference ID: 61-076-201200513 to Paragraph: 080 Reference ID: 61-080-20200715-76-82](#) and recommends that local authorities review and update their SCI and incorporate temporary changes that would help to prevent the spread of the disease but also allow the process of plan-making to continue.

1.6.2 NPPG [Paragraph: 077 Reference ID: 61-077-201200513 paragraph 77](#) states that, "Where any policies in the SCI cannot be complied with due to current guidance to help combat the spread of coronavirus (COVID-19), the local planning authority is encouraged to undertake an immediate review and update the policies where necessary so that plan-making can continue".

1.6.3 Hillingdon Council has reviewed the SCI and is now updating it. While the pandemic is hopefully coming to an end, the SCI is being updated to ensure that any potential similar situation in the future is appropriately planned for and to ensure alternative engagement methods for both development management and plan-making are identified and easy to implement if necessary to do so. These temporary alternative methods will be identified as such in the relevant sections of this SCI.

1.6.4 The alternative consultation practices will be temporary and will only be used when it is not possible to use the preferred engagement methods.

## 1.7 PLANNING INFORMATION AND SUPPORT

1.7.1 Contact details for all the relevant Council planning departments are provided at the end of this document should you need to contact us.

1.7.2 Further information about the planning process and how the planning system works is also available online at the Planning Portal website: [www.planningportal.gov.uk](http://www.planningportal.gov.uk). This website provides information on a number of different areas in planning in a clear and concise way.

1.7.3 Independent planning advice can also be obtained from Planning Aid, which is a voluntary service offering free, professional planning advice to community groups and individuals who cannot afford to employ a planning consultant. Planning Aid is independent from the Council. The contact details for Planning Aid are as follows:

**Online:** <https://planningaidforlondon.org.uk>/<http://www.rtpi.org.uk/planning-aid/>

Formatted: Font: Bold

**Telephone:** 020 7929 9494

**Email:** [advice@planningaid.rtpi.org.uk](mailto:advice@planningaid.rtpi.org.uk)

**Advice on the neighbourhood planning process can also be found at**  
<https://neighbourhoodplanning.org/>.

**1.7.4 The Council also offers a translation and/or interpretation service to ensure more individuals can be included in the planning process. Translations to other languages, Braille or audio tape, or interpreters, can be provided for this document as well as other planning documents if required by contacting the Council.**

## 1.8 FUTURE REVIEW

1.8.1 The SCI will be reviewed regularly and updated when necessary to reflect any changes in legislation or best practice guidance. ~~Planning practice guidance advises that SCI's are updated every five years at least. SCI's must be updated every 5 years at least as required by Section 10A of the Town and Country Planning (Local Planning) Regulations 2017.~~ The Council will also ensure that the most effective and appropriate consultation methods are used and incorporate these into the SCI where necessary.

1.8.2 The Council is also investigating opportunities to improve online access to planning services and will be reflected within future reviews.

## 2 PLAN-MAKING

### 2.1 WHAT IS PLAN-MAKING?

2.1.1 Plan making is the process of shaping and influencing the future planning and development of an area. Plan-making involves preparing evidence-based policies and supporting guidance informed by engagement with local stakeholders. Planning policies set out the long-term framework for development in the borough and form the basis for determining planning applications.

2.1.2 In Hillingdon, the hierarchy of planning policy is as set out in Figure 2 below.



Figure 2: Hierarchy of planning policy in Hillingdon

2.1.3 Collectively, the adopted London Plan, Local Plan and any adopted Neighbourhood Plans form the 'development plan' for Hillingdon. Planning applications (with a few exceptions such as development which falls within permitted development) will be assessed against the development plan and the NPPF.

2.1.4 The NPPF and national planning legislation require Local Plans to be created in consultation with the community and interested stakeholders.

2.1.5 Whilst views can be submitted to the Council at any time in respect to local plan matters there will be specific points in the plan-making process where the Council will actively seek views on its Local Plan. Engagement and participation early in the plan-making process can help shape local plans as they are being prepared and provides the opportunity to influence planning and development outcomes in the borough.

2.1.6 Hillingdon's Local Plan must be in 'general conformity' with the London Plan which sets out the overall strategic plan for London and provides context for the Local Plan. The Local Plan

must also be 'consistent with' national policy (the NPPF). Within this framework of national and London-wide policy, local plans can address local issues in proactive and creative ways that respond to the views and needs of local communities provided policies are evidence-based. Views expressed by the community and other interested stakeholders can also form the basis for new policies and the amendment of existing policies.

2.1.7 Local communities are also able to influence development in their area through Neighbourhood Planning, which is covered later in the document.

2.1.8 The final tier are those documents produce to support and guide the implementation of policies in the development plan. These can take the form of statutory Supplementary Planning Documents (SPDs) as well site briefs or master plans. Such documents cannot introduce new policies but they can explain how a particular policy should be applied.

## 2.2 CONSULTATION METHODS

2.2.1 The Council understands that consultation at different stages of plan preparation have different degrees of impact on the final content of the plan. Wide and more in-depth engagement particularly at the initial stages of plan preparation is the most important in affecting the direction of the plan and its policies. This is when participants have the most ability and effect on shaping the plan and a wide range of views are sought. The later stages are very important in helping refine policies in order to ensure they have the desired impact and those that have already participated have an opportunity to build on their initial ideas. The Council has therefore considered what additional measures beyond the statutory requirements it can employ to maximise participation at these early stages. The Council is also seeking to reach a wider range of people and ensure hard to reach groups are given the opportunity to participate in the planning process. Different methods will be used according to the scope of the consultation, the target audience and the resources available. Figure 3 outlines some of the different methods of consultation which will be utilised. The Council is opting not to be too specific about which methods will be used in which circumstance so that it can retain flexibility and use the consultation methods that are most appropriate to the type of plan being prepared.





Figure 3: Consultation methods Hillingdon Council will utilise for plan-making

**2.3 WHO WILL THE COUNCIL INVOLVE IN THE PLAN-MAKING PROCESS?**

**DUTY TO COOPERATE**

2.3.1 The Localism Act 2011 places a duty on the Council to work and cooperate with other local planning authorities, the [Mayor of London County Council](#) and other prescribed bodies to address strategic planning issues that cross administrative boundaries. [The London Plan also requires the Council to work with the Mayor of London and Transport for London on planning matters.](#)

2.3.2 As part of the duty to cooperate process, authorities are required as set out in the NPPF, to produce and maintain statements of common ground, which is a written record of progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. The purpose is to document where cooperation is and is not happening through the plan-making process. The statements will provide evidence that local plans are effective in relation to them being deliverable over the specified plan period and are sound in that they have been based on effective joint working on cross-boundary strategic matters.

2.3.3 The Council will meet its requirements under the duty to cooperate through regular engagement with its partners and will publish statements of common ground as they are prepared and finalised for publication.

#### 'SPECIFIC' AND 'GENERAL' CONSULTATION BODIES

2.3.4 Legislation provides the minimum legal requirement for consultation on local plan documents. This includes:

- Specific consultation bodies who must be consulted at formal consultation stages in Local Plan production. This includes statutory authorities such as neighbouring boroughs / districts, government agencies and utility providers;
- General consultation bodies include organisations and bodies who have an interest in the borough. This can include interest and amenity groups, resident's associations, property, trade and business associations, voluntary organisations and community groups; and
- Residents, businesses and landowners located in the local authority area.

2.3.5 It should be noted that not everyone in the borough will be contacted directly in respect of every planning document but details of such consultations will be made publicly available by a range of communication methods outlined in this document. Elected Council Members will be notified directly of consultation on every planning document produced by the Council. Residents, businesses or landowners/representatives are also able to sign up to the Council Planning Policy Consultation Database if they wish to be contacted directly with regards to planning documents.

2.3.6 As an example, an SPD that relates to only part of the borough or is being produced on a specific topic area may benefit from targeted consultation in that area or with specific partners or sections of the community.

2.3.7 Following key consultation stages, the Council will produce consultation summary reports which will provide information on the key issues raised and will provide a response to these prior to finalising a planning document. This summary will be available on the Council's website. It should also be noted that in many cases responses to the consultation may also be published in accordance with the relevant Privacy Statement.

**To sign-up to the Council's Planning Policy Consultation Database, please email the Council at [localplan@hillington.gov.uk](mailto:localplan@hillington.gov.uk)**

Formatted: Font: 16 pt, Bold, Font color: Accent 6

## 2.4 TEMPORARY CONSULTATION ARRANGEMENTS IN THE EVENT OF FUTURE SOCIAL DISTANCING

2.4.1 Under current circumstances (and in the event of any similar circumstances in the future) there may be variations to the consultation methods used. In these situations, the Council will seek to prioritise usage of consultation methods which allow for social distancing, such as increased use of social media, and will limit or stop altogether consultation methods which potentially put consultees at risk, such as public exhibitions and group meetings.

2.4.2 For certain consultations, the Council would ordinarily provide planning policy documents for inspection at various locations across the borough such as libraries and the Civic Centre. However, this may not be possible during times where social distancing is required or where the libraries remain closed.

2.4.3 Prior to the Coronavirus pandemic, the Government encouraged the use of social media tools and other platforms to communicate with communities in plan-making. This has now been emphasised further in an update to comply with COVID-19 guidance. The Council will keep under review its engagement processes and methods to ensure that consultation and engagement with our communities and stakeholders is effective whilst also ensuring the safety and well-being of all those involved. Where it is not possible to undertake certain methods of consultation due to social distancing, the Council will use all of its available channels of communication and will use online engagement methods to ensure that effective consultation on the Local Plan and other Local Plan Documents can take place. Further detail in relation to the consultation methods to be used will be provided at the time of the consultation, when we are aware as to whether any restrictions are in place at that time.

## 2.5 DEVELOPMENT PLAN DOCUMENTS

2.5.1 Development Plan Documents (DPDs) are planning policy documents which make up the Local Plan. The Local Plan is the Council's overarching planning policy document and part of the statutory development plan. The Local Plan sets out the strategic priorities for development of our borough and covers housing, commercial, public and private development, including transport infrastructure, along with protection for the local environment. It provides clear guidance on what development will and won't be permitted in the borough. At one end of the scale the Local Plan provides, for example, the policy framework against which we will assess a strategically important housing site. What new roads will be needed? What new schools or medical uses must be provided? How many of the homes must be truly affordable? At the other end, it includes the detailed policies which allow us to assess the suitability of the loss of a shop, a new basement or householder development.

2.5.2 To develop the Local Plan, the Council must have regard to statutory provisions, case law, and national and regional guidance. The Local Plan is consulted on and undergoes public examination conducted by a Planning Inspector appointed by national government. The Local Plan must progress through a number of stages until its ultimate adoption. The regulations set out minimum requirements for consultation throughout the plan preparation process.

2.5.3 Figure 4 below sets out the main stages in the local plan preparation process. It highlights both statutory and non-statutory stages which Hillingdon Council is committed to following.

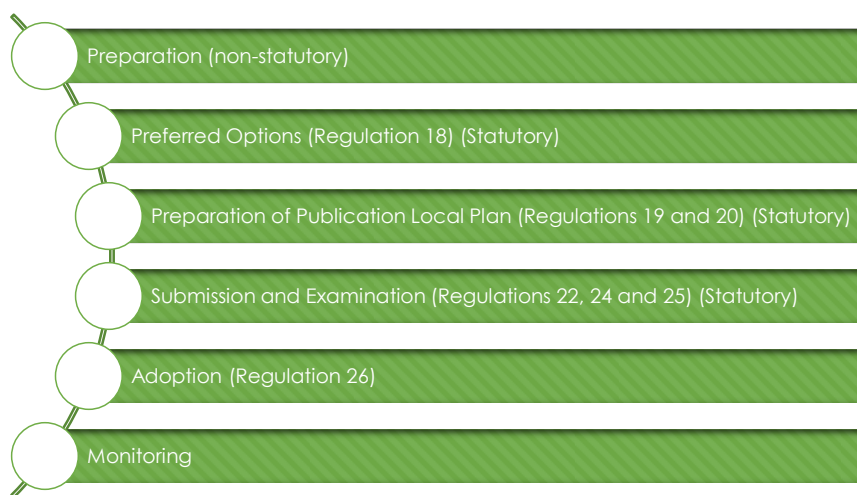


Figure 4: Stages in producing and adopting a local plan

2.5.4 There are opportunities for the community to be involved at various stages in the plan-making process, however involvement at the earliest stages in the plan-making process is likely to have the greatest influence on the final scope and content of the local plan. For this reason, Hillingdon Council will also seek to maximise community engagement at the

earlier stages of plan-making and go beyond statutory requirements. Consultation during the latter stages of plan-making will generally be more in line with the statutory requirements however, the Council will consider at the time whether it is appropriate to go beyond this.

#### MINIMUM CONSULTATION ACTIONS

2.5.5 As a minimum, the Council will do the following at each stage of the plan-making process for development plan documents during both statutory and non-statutory stages:

- Make consultation documents, supporting documents and related information available on the Council's website.
- Make consultation documents and supporting documents available for inspection at the Civic Centre.
- Notify 'specific' and 'general' consultation bodies and 'duty to co-operate' bodies of each consultation stage by email and invite comments.
- Notify residents and other interested parties on the Council's Planning Policy Consultation Database of each consultation stage by email or writing (where requested) and invite comments.
- Each consultation period in the local plan-making process will last for a minimum six-week period.

2.5.6 If you would like to be added to the Planning Policy Consultation Database, please email the Planning Policy Team at [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk)

#### CONSULTATION BEYOND STATUTORY REQUIREMENTS

2.5.7 The Council is committed to actively engaging the community and other key stakeholders in the plan-making process and so it will go beyond the minimum statutory consultation requirements at certain stages of the plan-making process, particularly early on in the plan-making process, where it feels it is appropriate to do so. Either public events, meetings, workshops and/or more advertising will be a feature of the earlier stages of the plan-making process to maximise the number of people that can shape the plan from an early stage. As plans progress, the significance of changes being made will be a determining factor in the level of community engagement that the Council will carry out beyond statutory requirements.

2.5.8 The Council will seek to engage the community early on before the formal stages of the plan-making process begin at the 'early engagement' and/or 'issues and options' stages. We believe that these, as well as the statutory 'Regulation 18' stage are where consultees can help shape the local plan the most. The Council will therefore seek to maximise consultation reach and depth at these stages and go beyond the statutory requirements.

2.5.9 The minimum consultation methods outlined above will be used at each stage of the plan-making process. In the earlier stages of the local plan process, additional consultation techniques will also be used where appropriate to maximise participation.

#### 2.6 DEVELOPMENT PLAN DOCUMENT PROCESS

2.6.1 This section highlights what is involved at each of the stages identified in figure 5 and the opportunities for community engagement at each stage. At all stages of the production process the Council will follow the statutory consultation requirements as set out in legislation. Where the Council considers it appropriate to do so it will go implement additional measures to maximise the effectiveness of the consultation. This may include consulting a wider group of people, publicising on social media and holding public events when it is safe to do so.

## PREPARATION - EVIDENCE GATHERING

### WHAT IS INVOLVED?

2.6.2 The purpose of this stage is primarily to gather evidence and collect information on the issues and options that will need to be addressed by the Local Plan. The Council will start the background scoping work and commission technical evidence on the various topics to be covered in the Local Plan. National policy requires proportionate evidence to support policy changes and new requirements on developments.

### OPPORTUNITIES FOR ENGAGEMENT

2.6.3 During the preparation phase the Council ~~will~~ undertake ~~some~~ informal/formal consultation, where appropriate. The extent and range of this consultation will depend on the content of the documents being prepared. This is an important stage as it narrows down the scope of what will be addressed in the document. The focus will be on identifying issues and options in relation to emerging evidence. The Council ~~will~~ also undertake a 'call for sites' requesting the submission of potential development sites across the borough. There ~~will~~ also be some general awareness raising of the Local Plan process identify interested parties. The Council will also consult on the Integrated Impact Assessment Scoping Report at this stage.

## PREFERRED OPTIONS (REGULATION 18)

### WHAT IS INVOLVED?

2.6.4 This stage builds on the preparation phase to create a set of preferred policies for further consultation. These will be the policy approaches that the Council considers are most appropriate and justified to take forward in the draft local plan. In preparing the draft policies the Council will take into account the outcomes of any previous consultations and technical evidence. At this stage further evidence may still need to be collected, however a number of technical pieces of evidence will be concluded and fed into the draft Local Plan.

2.6.5 The Council will publish a summary of the consultation responses received from the previous consultations and also set out how the Council considered these responses and what impact they had on the draft Local Plan.

### OPPORTUNITIES FOR ENGAGEMENT

2.6.6 The preferred options stage (Regulation 18) is likely to be that with the widest engagement. This is a stage where we first set out what the Council thinks may be the future policies and invites stakeholder feedback. At this stage the Council will ~~we can~~ supplement

the written consultations with a number of meetings and workshops and with face to face opportunities to explore the issues in real depth.

2.6.7 At this stage the Council will consult for a minimum six week period as per the statutory requirements, however the actual consultation period is likely to exceed this. The community and general and specific consultation bodies will be consulted on the contents of the draft local plan and the Integrated Impact Assessment (IIA) and have access to the evidence that underpins these policies.

2.6.8 If it is considered appropriate to do so the Council may consult on the preferred options more than once or reconsult on specific issues.

2.6.9 The most significant issues with the Local Plan should be addressed at this stage. At this stage the community can have the largest impact on shaping the Local Plan as it is still in its early stages. The next stage focuses on refining and finalising policies. It is more difficult for significant changes to be made to the content of the Local Plan or new policies introduced at later stages. This is the last opportunity for the Council to make significant changes to the content of the Local Plan and the Council will seek to ensure it has consulted as appropriately and addressed all issues raised up until this point.

## PUBLICATION LOCAL PLAN (REGULATION 19)

### WHAT IS INVOLVED?

2.6.10 At this stage the Council will publish its final version of the plan for submission to the Secretary of State for examination. This version of the plan will take account of the representations received at Regulation 18.

2.6.11 The Council will also publish a summary of the consultation responses received from the Regulation 18 consultation and also set out how the Council considered these responses and what impact they had on the Publication Local Plan.

2.6.12 The local plan viability assessment will be reviewed and finalised to ensure changes made as a result of the Regulation 18 stage do not affect the overall viability of the local plan policies.

### OPPORTUNITIES FOR ENGAGEMENT

2.6.13 The Council must consult for a minimum six week period as per the statutory requirements. The community and general and specific consultation bodies will be consulted on the contents of the publication local plan and the IIA and have access to the evidence that underpins these policies.

2.6.14 The scope of the consultation at this stage is more limited. The Council can only accept representations to confirm legal compliance in accordance with the NPPF, that 'duty to cooperate' requirements have been met, or to assess whether the tests of soundness identified in the NPPF have been met in preparing the plan.

## SUBMISSION AND EXAMINATION

### WHAT IS INVOLVED?

2.6.15 The draft plan and relevant supporting information will be submitted to the Secretary of State for independent examination. The supporting information will include all of the representations received, a summary of main issues raised, the background evidence and a consultation statement setting out how the Council has involved the community and other stakeholders in the preparation of the plan.

2.6.16 Following submission to the Secretary of State, an independent Planning Inspector will be appointed to conduct an examination in public of the draft plan. The purpose of the examination is for the Planning Inspector to assess the soundness and legal compliance of the plan, and whether the document is positively prepared, justified, effective and consistent with national policy. If, as a result of the evidence heard at the examination, the Inspector decides that the document needs significant amendment, there may be further formal consultation on the changes made, known as 'Main Modifications' to the plan.

#### OPPORTUNITIES FOR ENGAGEMENT

2.6.17 There is no consultation at the submission stage however specific, general and all other consultees who the Council consider may have an interest will be notified of the submission and examination.

2.6.18 The Inspector will consider all representations made during the Council's previous consultations and may invite further representations on specific issues to be considered as part of the examination.

#### ADOPTION

##### WHAT IS INVOLVED?

2.6.19 If the Plan is recommended for adoption (with or without recommended modifications) the Council will consider the Inspector's report and whether it wishes to adopt the document as recommended by the Inspector.

#### OPPORTUNITIES FOR ENGAGEMENT

2.6.20 The Local Plan, adoption statement and other relevant evidence base documents will be published on the council's website, and copies made available at the Council's offices and libraries. A copy of the adoption statement will also be sent to all consultees on the local plan consultation database including anyone who has asked to be notified of the adoption of the document.

#### [HILLINGDON LOCAL PLAN](#)

[The most up to date Local Plan and details of any updates can be found on the Council's website at https://www.hillingdon.gov.uk/local-plan.](https://www.hillingdon.gov.uk/local-plan)

## 2.7 SUPPLEMENTARY PLANNING DOCUMENTS (SPDS)

2.7.1 The purpose of Supplementary planning documents (SPDs) is to provide more detailed guidance on how the policies in the Local Plan are applied. While SPDs are



adopted formally by the Council and are material considerations in the determination of planning applications, they do not form part of the development plan.

2.7.2 As SPDs cannot introduce new policy requirements, the statutory consultation requirements for SPDs are less extensive than for development plan documents.

## 2.8 SPD PROCESS

2.8.1 Figure 5 below outlines the stages involved in producing an SPD

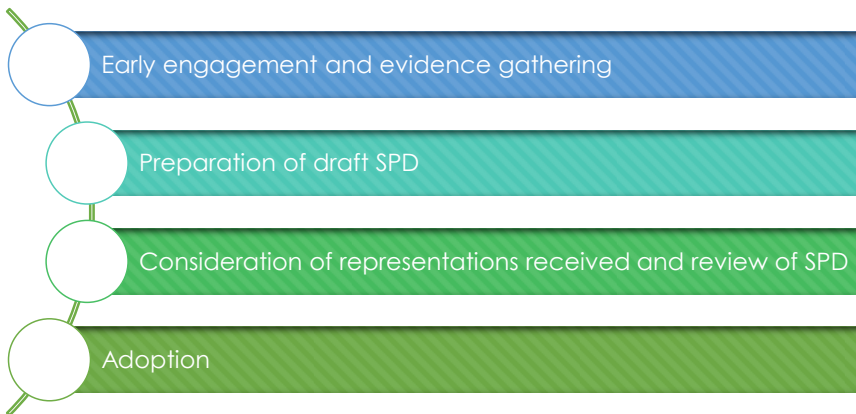


Figure 5: Stages of producing an SPD

### EVIDENCE GATHERING

#### WHAT IS INVOLVED?

2.8.2 The Council will collect baseline evidence, identify the issues to be addressed in the SPD and then identify reasonable options for guidance in the SPD. The Council may also engage with specific bodies relevant to the issue the SPD is trying to address.

#### OPPORTUNITIES FOR ENGAGEMENT

2.8.3 The Council has a duty to consult with specified environmental organisations (Natural England, Historic England and the Environment Agency) when determining the need for SEA. In situations where SEA is not deemed to be required, the Council has a duty to prepare a statement of its reasons for determining that SEA is not required.

2.8.4 Informal consultation with organisations and potentially other members of the community relevant to the issue being addressed may be undertaken if the Council considers it is appropriate and necessary to do so.

### PREPARATION OF DRAFT SPD (REGULATION 13)

#### WHAT IS INVOLVED?

2.8.5 The draft version of the SPD along with associated evidence base documents, SA/SEA and IIA reports (where necessary) will be formally published and a formal public consultation will be held for a minimum of four weeks, inviting statutory and non-statutory consultation bodies to share their views.

#### OPPORTUNITIES FOR ENGAGEMENT

2.8.6 At this stage the Council will consult for a minimum four-week period as per the statutory requirements. The community and general and specific consultation bodies will be consulted on the contents of the SPD and associated documents. This is the main opportunity for the community to influence the content of the SPD.

2.8.7 The Council will consider the content of the SPD before deciding on the appropriate scope and extent of consultation and how far beyond the statutory requirements it should go at this stage of the process. Where an SPD is specific to a location, the Council will seek to additionally engage with the local community of that location.

2.8.8 The Council will consult more than once at this stage of the process if it considers it appropriate to do so.

#### CONSIDERATION OF REPRESENTATIONS RECEIVED AND REVIEW OF SPD

##### WHAT IS INVOLVED?

2.8.9 The Council will review representations received and make changes to the SPD where justified.

2.8.10 A summary of the comments received will be made available on the Council's website. Personal information of individual consultees will not be published. The Council will publish a schedule of its response to each of the representations received and identify how particular issues have been addressed, and if they have not been addressed, why they were not.

2.8.11 Further consultation may be undertaken if responses lead to a significant change of direction.

#### ADOPTION

##### WHAT IS INVOLVED?

2.8.12 The SPD will be formally adopted by the Council. The SPD, associated documents and an adoption statement will be published on the Council website.

#### OPPORTUNITIES FOR ENGAGEMENT

2.8.13 A copy of the adoption statement will be sent to specific, general and duty to cooperate bodies, as well as individuals and organisations on the Council's Planning Policy Consultation Database.

## 3 NEIGHBOURHOOD PLANS

### 3.1 INTRODUCTION

3.1.1 Neighbourhood planning was introduced by the Localism Act (2011). It provides communities with a statutory power to shape how their area develops in the future. Neighbourhood plans allow communities to establish planning policies for the development in their area. Once 'made' (adopted), neighbourhood plans are part of the statutory development plan and must be considered alongside the Council's Local Plan when determining planning applications. Neighbourhood plans must be in general conformity with the strategic policies in the statutory development plan and have regard to national planning policy and guidance.

3.1.2 Neighbourhood plans are produced by local communities themselves, with support from the Council. The Council's role is to provide advice and support to Neighbourhood Forums developing a plan. At submission stage the Council will take a [procedural/administrative](#) lead on finalising the plan.

3.1.3 A neighbourhood plan must be developed by a neighbourhood forum that has been approved by the Council. Further information and more detailed guidance on the process of setting up Neighbourhood Forums can be found at the following websites: <https://neighbourhoodplanning.org/> and <https://www.gov.uk/guidance/neighbourhood-planning-2>. It is advised that these resources are reviewed before proceeding.

3.1.3 Local communities are also able to utilise Neighbourhood Development Orders. Neighbourhood Development Orders (including community right to build orders) grant planning permission for a specific type of development in a particular area. This could be either a particular development or a particular class of development such as housing or commercial.

3.1.4 The process for preparing a neighbourhood plan/order is set out in The Neighbourhood Planning (General) Regulations 2012. Figure 7 below summarise this process.

### 3.2 NEIGHBOURHOOD PLANNING PROCESS

3.2.1 The Neighbourhood Planning process is summarised in Figure 6 below.

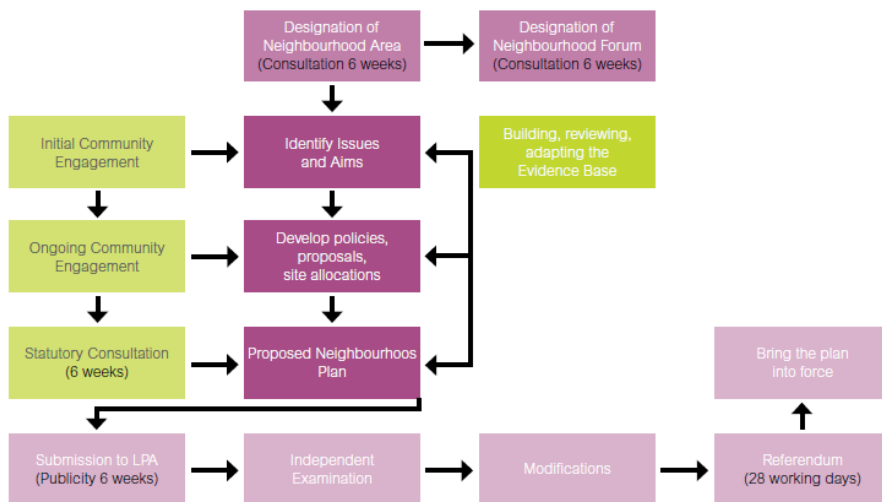


Figure 6: The Neighbourhood Planning Process

### 3.3 CONSULTATION BY NEIGHBOURHOOD FORUMS

3.3.1 Given its status as a development plan document, a neighbourhood plan must go through a formal consultation and examination process before it can be **'made'** (adopted). The Neighbourhood Forum developing the plan is responsible for the design and management of the consultation.

3.3.2 The nature of the consultation will depend on the stage of Neighbourhood Plan's progression:

- *Setup*: In order to prepare a neighbourhood plan, local people first need to set up a Neighbourhood Forum and to propose the boundaries of a Neighbourhood Area. The Council would encourage the Forum to consult those living and working within the proposed neighbourhood area on both, the appropriateness of the forum and the nature and the extent of the proposed area.
- *Preparation*: Whilst, there is no requirement in the regulations for the Forum to involve local people in the preparation of the plan, it is strongly advisable. It is only by wider public involvement will the forum be able to demonstrate that the plan reflects the views and ambitions of the local community. It is possible that the plan will not be approved by the examiner unless public involvement can be demonstrated.
- *Submission and examination*: Before the plan is finalised, the Forum must make a draft available for local people to comment on. It is for the Forum to decide how best to do this and to decide what questions they wish to ask. The Forum will need to be able to demonstrate how it has taken any comments into account when the Plan is examined and an examiner considers whether it meets the "basic conditions".

## 3.4 COUNCIL SUPPORT

3.4.1 Producing a Neighbourhood Plan is a technical process and requires navigation of legislative requirements, as well as technical information which local communities may not be familiar with. The Council has a statutory duty to provide advice and assistance to Neighbourhood Forum's preparing a neighbourhood plan. The Council also believes that for neighbourhood plans to be effective, well informed and representative of the local community's views, Council resources and experience applied to certain stages beyond the statutory requirements can be very beneficial to the process.

3.4.2 The type of advice and assistance will vary on a case-by-case basis however generally speaking the Council will offer technical and logistical support, planning advice and general guidance throughout the plan preparation process. The Council will also assist with consultation and provide contact details for relevant organisations, subject to restrictions of the GDPR.

# 4 COMMUNITY INFRASTRUCTURE LEVY

## 4.1 COMMUNITY INFRASTRUCTURE LEVY (CIL)

4.1.1 The Community Infrastructure Levy (CIL) Regulations allow the Council to levy a charge on developers for certain types of new development to help fund improvements to local infrastructure (e.g. schools, transport, green spaces and health facilities) which are needed as a result of development. The Council has an adopted CIL Charging Schedule which sets out the charges for different types of development which will be reviewed from time to time.

<https://www.hillingdon.gov.uk/community-infrastructure-levy>

## 4.2 CIL PROCESS

4.2.1 The key stages in preparing the Hillingdon CIL Charging Schedule are summarised in Figure 7 below:



Figure 7: CIL Charging Schedule Process

### EVIDENCE GATHERING

4.2.2 At this stage the Council will prepare evidence base studies to inform the Draft Charging Schedule which will set out the proposed levy rates. The Council may engage with key stakeholders such as infrastructure providers and other interested parties.

### PUBLICATION OF DRAFT CHARGING SCHEDULE

4.2.3 The Draft Charging Schedule will be published for consultation for a minimum period of six weeks. This will involve publication of the draft charging schedule and supporting documents on the Council website and writing to specific and general consultation bodies as well as all individuals and organisations on the Council's Planning Policy Consultation Database.

4.2.4 Details of the comments received will be made available on the Council's website along with a summary of their content. Personal information of individual consultees will not be published. The Council will publish a schedule of its response to each of the representations received and identify how particular issues have been addressed.

#### SUBMISSION

4.2.5 At this stage the Charging Schedule along with a summary of the main issues raised through consultation, copies of the representations received, and associated evidence is submitted to for examination.

4.2.6 At the submission stage the Council will prepare a statement summarising the results of the consultation and contact all those who requested notification that the draft charging schedule has been submitted to the secretary of state.

#### EXAMINATION

4.2.7 An independent examiner will be appointed to examine the draft schedule. The examiner will assess whether it is legally compliant, economically viable and consistent with national guidance. The examiner may request further representations if required.

4.2.8 The examiner will make recommendations in a final report which will be published on the Council's website.

#### ADOPTION

4.2.9 Having regard to the examiner's recommendations, the Council will formally adopt the Charging Schedule. The Charging Schedule, Adoption Statement and relevant evidence will be published on the website and notify those who have indicated they wish to be informed of adoption.

#### SPENDING OF CIL FUND

[While Hillingdon's CIL Charge is in effect, the council publishes a list setting out the strategic projects or types projects it intends to fund from the revenue raised from the charge. This list is known as the Regulation 123 list and this can be found at <https://www.hillingdon.gov.uk/community-infrastructure-levy>. Any reviews to this list will be subject to public consultation.](#)

## 5 OTHER POLICY GUIDANCE

### 5.1 ARTICLE 4 DIRECTIONS

5.1.1 Certain works that would normally require planning permission are permitted by the General Permitted Development Order (GPDO) 2015.

5.1.2 The GPDO enables councils to issue a direction under article 4 to restrict the scope of permitted development rights either in relation to a particular area or site, or a particular type of development anywhere in the authority's area. Article 4 directions are issued where evidence suggests that undertaking certain types of development (where planning permission is not normally required) would harm local amenities or the proper planning of an area.

5.1.3 The Council will follow the minimum statutory requirements for consulting on new or amended article 4 directions which includes as set out in Schedule 3 of the GDPO.

<https://www.hillingdon.gov.uk/article-4-directions>

### 5.2 CONSERVATION AREA APPRAISALS & MANAGEMENT PLANS

5.2.1 Conservation area appraisals and management plans define the special character of a conservation area. They set out our approach for its preservation and improvement. Generally, they include:

- an appraisal of the special character of the area;
- lists of buildings and features which make a positive contribution to the character and appearance of the area;
- lists of sites that have a negative impact on the conservation area;
- where an opportunity may exist for improvement of the area by redevelopment of a building or site; and
- management strategies which set out our policies and procedures to manage, monitor and enforce change in the area.

5.2.2 The Council ~~will~~<sup>may</sup> engage with local residents, residents' associations and conservation societies ~~in the process of~~<sup>before</sup> producing a ~~new~~ draft conservation appraisal or management plan. The extent of engagement will depend upon the content of the appraisal and/or management plan, and if amending an existing appraisal and/or management plan, the level of changes being proposed.

<https://www.hillingdon.gov.uk/conservation-areas>



# 6 DEVELOPMENT MANAGEMENT

## 6.1 INTRODUCTION

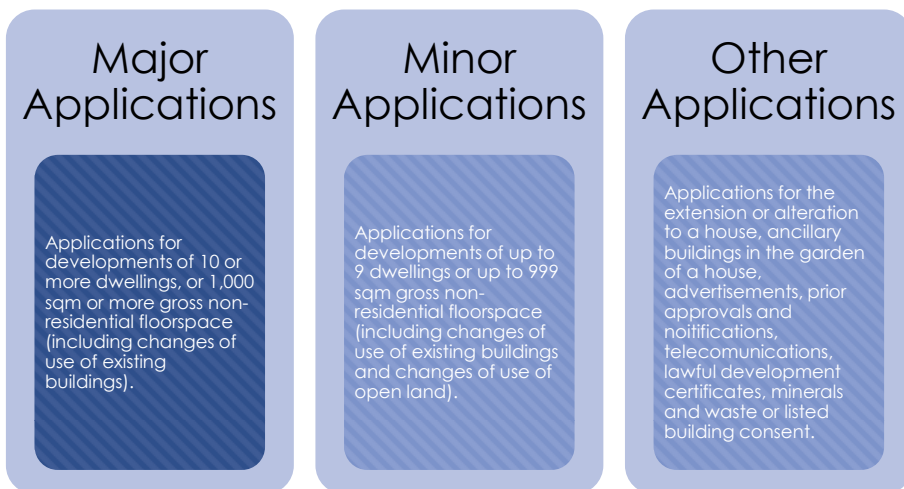
6.1.1 Development management is the process by which the Council determines whether a proposal for development should be granted planning permission, taking into account the development plan, the National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG) and any other materials considerations, including consultation responses.

6.1.2 The SCI must set out standards of consultation to be achieved by the Council in making decisions on planning applications. Planning applications can be submitted for a range of developments which are explained below.

6.1.3 The Town and Country Planning (Development Management Procedure) (England) Order 2015 sets out a minimum standard of publicity and notification of applications to the local community, depending on the nature of the application.

## 6.2 TYPES OF PLANNING APPLICATIONS

6.2.1 There are a number of different types of applications depending on the consent sought. They are commonly sorted into the following three categories:



These definitions are as prescribed in Government policy and guidance.

## 6.3 SUMMARY OF THE PLANNING APPLICATION PROCESS

6.3.1 Figure 8 below outlines the planning application process.

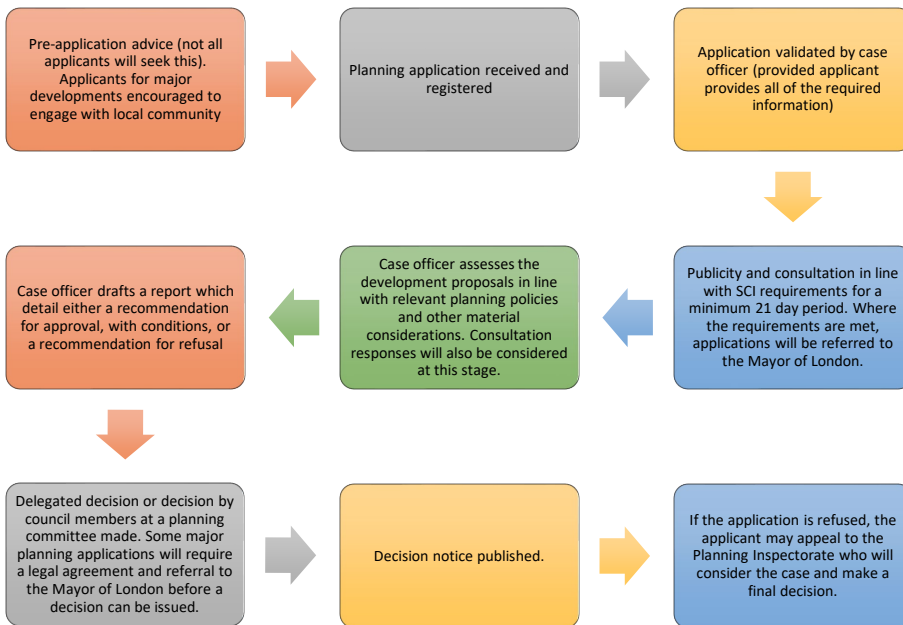


Figure 8: Overview of the planning application process

*Further information on GLA referable applications can be found here at: <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/what-powers-does-mayor-have-planning-applications>.*

Formatted: Font: Italic

## 6.4 PRE-APPLICATION

6.4.1 The Council believes that developments of varying scale can benefit from pre-application advice. The Council offers a full pre-application advice service for applicants proposing schemes that range in scale from 'small scale minor' developments to 'large scale strategic' developments. Further specific information about the service can be found by following this link: [Hillingdon Full Pre-Application Advice](#).

6.4.2 The service is designed to:

- make applicants aware of any likely issues that may affect the outcome of their development proposals and find solutions;
- provide positive recommendations to a scheme;
- provide an understanding of policies and specialist areas that apply to the development;

- give early advice on applications that have little or no prospect of success.

6.4.3 The advice benefits the applicant by speeding up the application process and minimising the costs of submitting subsequent revisions or unacceptable applications.

6.4.4 Depending on the nature of the scheme the Council will also encourage pre-application engagement with statutory and non-statutory consultees, elected members and local people. The level of engagement should be proportionate to the nature and scale of a proposed development.

## 6.5 PRE-APPLICATION CONSULTATION BY APPLICANTS

6.5.1 Whilst not mandatory, the Council encourages applicants to engage with the owners / occupiers of neighbouring land / premises and wider community at the earliest stage of preparing their development proposal (pre-application stage) where it will add value to the process and the outcome.

6.5.2 There are clear benefits of involving the community in developments which are considered likely to have an impact on the community, and the most effective time to involve the community is at the pre-application stage. At this point in the development process, information and views gained from the community can still have a meaningful impact on the final shape the development takes. It will also assist in resolving any objections and conflicts prior to a formal application being submitted. Engaging in consultation on proposals which have already been developed to a point where it is difficult to take other views on-board would be a less meaningful exercise.

6.5.3 Consultation by applicants using some of the methods identified in Figure 9 below are encouraged. The people involved and the level of engagement needs to be proportionate to the nature and scale of a proposed development. The Council can also advise developers on good practice for engagement and assist in providing contact details for stakeholders likely to be interested in the proposal or affected by it.

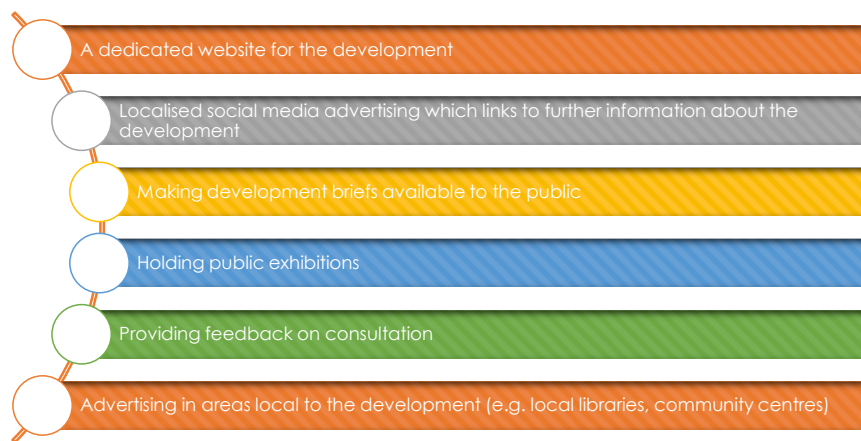


Figure 9: Preferred pre-application consultation methods for applicants

6.5.4 The Council is aware that there are significant costs involved in undertaking pre-application consultation, and that such costs will have to be met by the applicant. However, the Council considers that depending on the type and size of the scheme, such costs can be a worthwhile expense to the applicant, given that it enables the community to engage with the emerging proposals and provides the opportunity to improve the quality of the application.

6.5.5 It is encouraged that the results of any pre-application consultation with the community be formally included as a Statement of Pre-Application Consultation as part of the planning application submission which outlines:

- the methods of consultation used to engage community participation;
- who was consulted and the level of involvement; and
- how matters raised in consultation were addressed by the development proposals.

## 6.6 STATUTORY CONSULTATION REQUIREMENTS FOR THE COUNCIL

6.6.1 After a local planning authority has received a planning application, it is required to undertake a formal period of consultation where views on the proposed development can be expressed.

6.6.2 The formal consultation period will be set out in the publicity accompanying the planning application. It will normally last for a minimum of 21 days however this may be extended if the Council considers it to be appropriate. This period is also statutorily required to be extended to 30 days for applications accompanied by an Environmental Statement made under the 2017 EIA Regulations, and extended by the equivalent amount when the consultation period includes bank or public holidays.

6.6.3 There are some statutory consultation requirements which local planning authorities must follow as a minimum, depending on the type of planning application received. Statutory methods of consultation for different development types are outlined in Table 1 below.

Type of development	Site Notice	Site notice or neighbour notification letter	Newspaper advertisement	Website
Applications for major development as defined in Article 2 of the Development Management Procedure Order (which are not covered in any other entry)	x	✓	✓	✓
Applications subject to Environmental Impact Assessment which are accompanied by an environmental statement	✓	x	✓	✓
Applications which do not accord with the development plan in force in the area	✓	x	✓	✓

Applications which would affect a right of way to which Part 3 of the Wildlife and Countryside Act 1981 applies	✓	x	✓	✓
Applications for planning permission not covered in the entries above eg non-major development	x	✓	x	✓
Applications for listed building consent where works to the exterior of the building are proposed	✓	x	✓	✓
Applications to vary or discharge conditions attached to a listed building consent or involving exterior works to a listed building.	✓	x	✓	✓
Applications for development which would affect the setting of a listed building, or affect the character or appearance of a conservation area.	✓	x	✓	✓

Table 1: Statutory consultation requirements for development management procedures

## 6.7 WHO WILL THE COUNCIL CONSULT

6.7.1 After a local planning authority has received a planning application, it will undertake a period of consultation where views on the proposed development can be expressed. The formal consultation period will normally last for 21 days, and the local planning authority may identify and consult a number of different groups.

6.7.2 The Council will consult neighbouring residents within a certain radius of the application site and community groups. Not all individuals / associations that the Council will consult are required to be consulted by law however the Council recognises the valuable input that local residents can provide to the planning application process.

6.7.3 In most cases, where new development (e.g. 'major' application) affects more properties than those that are immediately adjacent to the boundary of the site, wider consultation may be carried out. We encourage residents and businesses to [use the 'Map Search' function on the https://www.hillingdon.gov.uk/planning-search website, which displays planning applications currently out to consultation. It allows you to identify the application, view the details and documents, and submit a comment.](https://www.hillingdon.gov.uk/planning-search) [Check our weekly list of received applications here:-](#)

<https://planning.hillingdon.gov.uk/OcellaWeb/planningSearch>

6.7.4 The Council are also required by law to consult statutory consultees. Statutory consultees include bodies such as other local planning authorities, NATS, the Environment Agency, Forestry Commission, Historic England, Natural England, Sport England etc.

6.7.5 In addition to the statutory consultees, local planning authorities will need to consider whether there are reasons to engage other consultees who – whilst not designated in law – are likely to have an interest in a proposed development (non-statutory consultees).

Formatted: Font color: Accent 1

6.7.6 Input will also be sought from relevant Council departments such as with housing, environmental health, transport and other specialist departments.

6.7.7 Ward councillors will also be notified when an application relates to their area.

## 6.8 DETAILED PLANNING APPLICATION PROCESS AND OPPORTUNITIES FOR ENGAGEMENT

6.8.1 Table 2 below sets out the planning application process in detail and the different requirements and opportunities for engagement and different stages of the process.

Planning application stage	Process and requirements	Opportunities for engagement
<b>Receipt and registration of planning application</b>	<ul style="list-style-type: none"> <li>Ensure the applicant has provided all the relevant information and fees and meets validation requirements.</li> </ul>	
<b>Publicity and consultation</b>	<ul style="list-style-type: none"> <li>Depending on the type of application, consult in line with the regulations as a minimum.</li> <li>Consultation will be for a minimum 21 day period.</li> <li>If the scheme is amended, and we consider that those amendments raise <b>substantive</b> new issues which consultees may wish to comment on, the Council will re-consult for a further <u>14</u> days.</li> <li><u>Once an application has been submitted, and if it meets the Mayor of London Order, the Council is required to refer it to the Mayor. The Mayor has six weeks to provide comments on the application.</u></li> </ul>	<p>The Council will consult the relevant stakeholders and members of the community in accordance with the regulations as a minimum. Depending on the type of application this will involve all or some of the following:</p> <ul style="list-style-type: none"> <li>Publishing the application details and instructions on how to comment on the Council's website.</li> <li>Sending letters to the owners / occupiers of properties adjoining the application site advising of application and the period in which</li> </ul>

	<p><u>assessing whether it complies with the London Plan policies. This is a consultation response known as stage one.</u></p> <ul style="list-style-type: none"> <li>• <u>The application is then considered by the Council at its planning committee, where it decides whether to grant or refuse permission.</u></li> <li>• <u>Following its consideration, the Council is then required to refer the application to the Mayor for his final decision, known as a Stage 2 referral. The Mayor has 14 days to make a decision to allow the local planning authority decision to stand, to direct refusal, or to take over the application, thus becoming the local planning authority. More details on GLA referable applications can be found at: <a href="https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/what-powers-does-mayor-have-planning-applications">https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/what-powers-does-mayor-have-planning-applications</a></u></li> </ul>	<p>to submit comments, and / or;</p> <ul style="list-style-type: none"> <li>• Site notice placed on or near sites subject to applications for development (where it is considered safe to do so), and / or;</li> <li>• Publishing a notice in the local press for certain types of development;</li> <li>• <u>A weekly list of all new applications received by the Council will be posted on the website and emailed to subscribers. Applications being consulted on will be posted on the Council's 'Map search' tool at <a href="https://www.hillingdon.gov.uk/planning-search">https://www.hillingdon.gov.uk/planning-search</a>.</u></li> </ul> <p>Depending on the proposals, the Council will also consult with:</p> <ul style="list-style-type: none"> <li>• Various statutory and non-statutory consultees.</li> <li>• Other bodies and interest groups relevant to the proposal</li> <li>• Duty to Cooperate bodies on major strategic applications or neighbouring authorities on applications for development close the borough boundary.</li> </ul>
--	---	--

<b>Assessment</b>	<ul style="list-style-type: none"> <li>The Planning Case Officer will normally visit the site (where this is safe to do so).</li> <li>All material considerations will be taken into account in assessing the application, including relevant national, regional and local planning policies and consultations responses.</li> <li><del>Comments received will be put on the website however personal details such as signatures, phone numbers and email addresses will be redacted.</del></li> </ul>	
<b>Making a decision</b>	<ul style="list-style-type: none"> <li>The planning case officer will make a recommendation on the application in a report which sets out the reasoning, along with a summary and consideration of comments and consultation responses.</li> <li>The majority of planning applications are determined under delegated powers.</li> <li>Decisions for such applications will be made in accordance with the Council's 'Scheme of Delegation':  <a href="#">Council constitution and delegations - Hillingdon Council</a></li> <li>In certain circumstances a planning application will be reported to and determined by a planning committee.</li> </ul>	<ul style="list-style-type: none"> <li>It is possible for individuals / organisations to speak at and address the planning committee. How to do this is set out on the Council's website at: <del><a href="#">Planning Committees - Hillingdon Council London Borough of Hillingdon - Planning committees</a></del></li> <li>The Committee meetings are broadcast live on YouTube and are available for viewing after the meeting has been held. A link can be found on the Council's website.</li> <li>Once a decision has been issued, a decision notice will be sent to the applicant and / or agent to inform them of the decision.</li> <li>An officer's report is also published which sets out how the officer has assessed the</li> </ul>



		<p>development proposal and their recommendations.</p> <ul style="list-style-type: none"> <li>• If you have commented on an application, you will also be notified of the decision.</li> <li>• All planning decisions are published on the Council's website.</li> </ul>
<b>Post decision</b>	<ul style="list-style-type: none"> <li>• If the applicants disagree with the Council's decision, they have the opportunity to make an appeal to the Secretary of State.</li> <li>• <u>There is no right of appeal for third parties.</u> This means that if planning permission is granted a member of the public cannot take the application to an appeal.</li> <li>• <u>The following website provides guidance on the appeals procedure:</u> <a href="https://www.planningportal.co.uk/info/200207/appeals">https://www.planningportal.co.uk/info/200207/appeals</a></li> </ul>	

Table 2: Planning application process and opportunities for engagement in Hillingdon

## 6.9 CHANGES TO DEVELOPMENT MANGEMENT PROCEDURES IN RESPONSE TO FUTURE SOCIAL DISTANCING

6.9.1 At the time of writing this SCI, temporary changes to legislation and national planning practice guidance as a result of Covid-19 were introduced.

6.9.2 Whilst Covid-19 means that some consultation methods previously undertaken may not be possible at present, the Council will endeavour to use other consultation methods which comply with social distancing guidance to enable people to be fully involved in the development management process. The SCI does not place limitations in terms of additional measures the Council could use to consult effectively and the Council will use alternative methods where it considers it appropriate to do so.

6.9.3 In order to execute statutory consultation requirements (where legislation has not been altered) the Council reserve the right to ask the applicant to undertake the following:

- Erect site notices on behalf of the Council and send dated photographic evidence that a notice has been erected on site;
- Send dated photographs of the site and surrounding area.

6.9.4 These changes will continue to apply until Covid-19 related restrictions are formally removed. However, in the event that restrictions are reintroduced due to Covid-19 or any other extraordinary event which requires restrictions to be put into place, alternative development management procedures appropriate to the situation will be reintroduced.

6.9.5 Meetings with officers, for example as part of planning applications or pre-application enquiries are also being carried out via video conferencing at present due to Covid-19. It is intended that this practice continues where appropriate.

## 6.10 VIEWING AND COMMENTING ON A PLANNING APPLICATION

6.10.1 Anyone can respond to a planning consultation. Comments should relate to material planning considerations. Material planning considerations are only those matters that can be considered within planning law in assessing and determining a planning application. Figure 13 in section 7.11 "Material Planning Considerations" below provides a list of examples of topics which can be considered in assessing and determining a planning application.

6.10.2 Comments related to 'non-material' considerations cannot be taken into account. Non-material considerations include issues such as the loss of property value, boundary and other legal disputes between neighbours, potential problems associated with construction work and competition between businesses.

6.10.3 Comments received the defined consultation period will be fully considered. However, comments cannot be considered in isolation or be the sole justification for a particular decision on a planning application. The case officer and / or planning committee will consider the comments alongside the development plan and other relevant considerations before making a recommendation or decision.

6.10.4 It is important that personal information is not included in comments. Any objections and comments from members of the public will be noted in the planning case officer's report, along with how they have been considered.

6.10.5 Comments on planning applications can be made in the following ways:

**Via the website at:**

<https://www.hillingdon.gov.uk/article/6380/Comment-on-a-planning-application>

**By post:**

**Development Management – Planning**  
**3N**  
**London Borough of Hillingdon**  
**Civic Centre**  
**High Street**  
**Uxbridge**  
**Middlesex**  
**UB8 1UW**

**By email to the allocated case officer or by emailing:**

[planning@hillingsdon.gov.uk](mailto:planning@hillingsdon.gov.uk)

6.10.6 To ensure comments are considered they must include details of which planning application and site address the comments relate to as well as the name of the case officer.

6.10.7 All comments on planning applications must be made before the consultation period ends, which is usually within 21 days of the date of the notification letter, or 21 days from the date of a press notice or site notice appearing. The date the consultation period ends will usually be noted on the website. The local planning authority will only determine a planning application after the public consultation period has ended.

## 6.11 MATERIAL CONSIDERATIONS

6.11.1 When making a decision, we can only take account of certain issues that are legally allowed to influence planning applications – these are known as 'Material planning considerations'. Examples of material considerations are listed in Figure 10 below. [This is not an exhaustive list.](#)



Figure 10: Material considerations

## 6.12 APPEALS

6.12.1 An applicant can appeal a decision made by the local authority on a planning application if they disagree with it or if the application wasn't determined within eight weeks (for a typical householder development) or 13 weeks for major developments. There are no third-party rights of appeal - so if you have objected to a planning application and it is approved by the LPA then you cannot appeal that decision.

6.12.2 Where an applicant chooses to appeal a decision, the Planning Inspector acts as an independent decision-maker. Any representations made at the application stage will be considered by the Planning Inspector, alongside relevant policy and other material considerations.

6.12.3 Further information about the appeal process can be found on the Planning Portal website and by following the link here: [Appeals | Planning Portal](#).

## 6.13 PLANNING ENFORCEMENT

6.13.1 The Council can use its planning enforcement powers to resolve breaches of planning control. The process of planning enforcement seeks to ensure that people comply with planning law and the requirements of a planning permission. The majority of cases arise through referrals from members of the public, councillors and council officers. As such, local people play an essential role in this aspect of the planning system and local people are encouraged to contact the Council with any information related to unauthorised development and its impacts so that we can keep responding to local concerns.

6.13.2 Further information on the Council's planning enforcement procedures can be found here: [Planning enforcement - Hillingdon Council](#)

## 7 MONITORING AND REVIEW

7.1 The SCI will be reviewed regularly to ensure consultation techniques and principles are still fit-for-purpose. As a minimum, the SCI will be reviewed every five years as required by Section 10A of the Town and Country Planning (Local Planning) Regulations 2017. In monitoring the SCI, the Council will review whether engagement in the plan-making and development management process is inclusive, effective and whether participation is being maximised. The Council will also take on feedback received and see where it can improve the effectiveness and reach of engagement on planning issues with the community.

7.2 Changes to government guidance and / or regulations may also instigate an earlier review and update of the SCI.

## 8 LINKS TO USEFUL RESOURCES AND INFORMATION

8.1 This section provides links to further information on some of the topics mentioned above.

- Hillingdon planning application search - <https://www.hillingdon.gov.uk/article/6379/Search-planning-applications>
- Hillingdon Local Plan documents - <https://www.hillingdon.gov.uk/local-plan>
- Hillingdon planning enforcement - <https://www.hillingdon.gov.uk/planning-enforcement>
- Hillingdon planning appeals guidance - <https://www.hillingdon.gov.uk/planning-appeals>
- Hillingdon conservation areas - <https://www.hillingdon.gov.uk/conservation-areas>
- Hillingdon planning advice (including pre-application advice) - <https://www.hillingdon.gov.uk/planning-advice>
- Hillingdon Community Infrastructure Levy (CIL) - <https://www.hillingdon.gov.uk/community-infrastructure-levy>
- Hillingdon Article 4 Directions - <https://www.hillingdon.gov.uk/article-4-directions>
- Hillingdon Neighbourhood planning - <https://www.hillingdon.gov.uk/neighbourhood-area>
- GLA Referrable planning application guidance - <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/what-powers-does-mayor-have-planning-applications>
- Planning Portal – General planning guidance on a number of topic areas - <https://www.planningportal.co.uk/info/200127/planning>
- Planning Portal guidance on planning permission - <https://www.planningportal.co.uk/info/200187/your-responsibilities/37/planning-permission>
- Planning Portal Use Classes Order guidance - <https://www.planningportal.co.uk/info/200130/common-projects/9/change-of-use>
- National Planning Practice Guidance – national guidance on a number of different planning areas - <https://www.gov.uk/government/collections/planning-practice-guidance>

8.2 This is not an exhaustive list of links. If you need further information, please use the contact details provided at the end of this document.

Field Code Changed

## GLOSSARY

This glossary is neither a statement of law nor an interpretation of the law, and its status is only an introductory guide to planning issues and should not be used as a source for statutory definitions.

**Authority Annual Monitoring Report (AMR):** Local authorities are required to produce Authority Monitoring Reports (AMRs) under the Town and Country Planning (Local Planning) (England) Regulations 2012. Such reports provide updates on planning policy documents and monitoring information to help assess the progress and effectiveness of policies in the Development Plan.

**Article 4 Direction:** An article 4 direction is a direction under article 4 of the General Permitted Development Order which enables the Secretary of State or the local planning authority to withdraw specified permitted development rights across a defined area.

**Community Infrastructure Levy (CIL):** The Community Infrastructure Levy (the 'levy') is a charge which can be levied by local authorities on new development in their area. It is an important tool for local authorities to use to help them deliver the infrastructure needed to support development in their area.

**Development Plan:** Is defined in section 38 of the Planning and Compulsory Purchase Act 2004, and includes adopted local plans and neighbourhood plans.



**Development Plan Document (DPD):** Development Plan Documents (DPDs) are planning policy documents which make up the Local Plan. They help to guide development within a local planning authority area by setting out the detailed planning policies, which planning officers use to make their decisions on planning applications.

**Equality Impact Assessment:** The equality impact assessment is a systematic and evidence-based tool, which enables us to consider the likely impact of work on different groups of people. It is designed to ensure that a policy, project or scheme does not unlawfully discriminate against any protected characteristic.

**Habitats Regulations Assessment (HRA):** A Habitats Regulations Assessment (HRA) refers to the several distinct stages of Assessment which must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it.

**Health Impact Assessment (HIA):** Health Impact Assessment (HIA) is a tool to identify and optimise the health and wellbeing impacts of planning.

**Independent Examination:** The process by which a planning inspector may publicly examine a Development Plan Document (DPD) before issuing a binding report. The findings set out in the report of binding upon the local authority that produced the DPD.

**Integrated Impact Assessment (IIA):** The IIA brings together into a single document a number of assessments which are required to assess the social, environmental and economic impact of the planning policies contained in the DPDs. following statutory requirements are addressed and presented together in one document:

- o Sustainability Appraisal (SA) and Strategic Environmental Assessments (SEA), and
- o Health Impact Assessment (HIA) and
- o Equalities Impact Assessment (EqIA)
- o Habitats Regulation Assessment (HRA)

**Local Development Documents (LDD):** These include Development Plan Documents (which form part of the statutory development plan) and Supplementary Planning Documents (which do not form part of the statutory development plan). LDDs collectively deliver the spatial planning strategy for the local planning authority's area.

**Local Development Scheme:** The local planning authority's scheduled plan for the preparation of Local Development Documents.

**Local Plan:** A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.

**Neighbourhood Development Order:** An Order made by a local planning authority (under the Town and Country Planning Act 1990) through which parish councils and neighbourhood

forums can grant planning permission for a specific development proposal or classes of development.

**Neighbourhood Plans:** A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).

**Permitted Development Rights:** Permission to carry out certain limited forms of development without the need to make an application to a local planning authority, as granted under the terms of the Town and Country Planning (General Permitted Development) Order.

**Strategic Environmental Assessment (SEA):** A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.

**Supplementary Planning Document:** Documents which add further detail to the policies in the local plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

**Sustainability Appraisal (SA):** An appraisal of the economic, environmental and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development.

# CONTACT SHEET

## DEVELOPMENT MANAGEMENT

**Address:**

Development Management Team  
London Borough of Hillingdon  
3N, Civic Centre  
High Street  
Uxbridge  
Middlesex  
UB8 1UW

**Email:** [planning@hillingdon.gov.uk](mailto:planning@hillingdon.gov.uk)

**Web:** [www.hillingdon.gov.uk/planning-search](http://www.hillingdon.gov.uk/planning-search)

## PLANNING POLICY

**Address:**

Planning Policy Team  
London Borough of Hillingdon  
3N, Civic Centre  
High Street  
Uxbridge  
Middlesex  
UB8 1UW

**Email:** [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk)

**Web:** <https://www.hillingdon.gov.uk/planning>

## PLANNING ENFORCEMENT

**Address:**

Planning Enforcement Team  
London Borough of Hillingdon  
3N, Civic Centre  
High Street  
Uxbridge  
Middlesex  
UB8 1UW

**Email:** [planningenforcement@hillingdon.gov.uk](mailto:planningenforcement@hillingdon.gov.uk)

**Web:** [www.hillingdon.gov.uk/planning-enforcement](http://www.hillingdon.gov.uk/planning-enforcement)

This page is intentionally left blank

## LONDON BOROUGH OF HILLINGDON ENFORCEMENT POLICY

<b>Cabinet Member(s)</b>	Cllr John Riley
<b>Cabinet Portfolio(s)</b>	Public Safety & Transport
<b>Officer Contact(s)</b>	Stephanie Waterford, Planning, Environment, Education & Community Services.
<b>Papers with report</b>	Appendix 1 – Draft Enforcement Policy

### HEADLINES

<b>Summary</b>	This report seeks the approval and adoption of the new London Borough of Hillingdon Enforcement Policy which will consolidate practices and ensure a consistent approach to enforcement across the Council's regulatory and enforcement services. The Policy sets out the legal principles, responsibilities and considerations which officers will follow when enforcing regulatory legislation.
<b>Putting our Residents First</b>	This report supports the following Council objectives of: <i>Our People;</i> <i>Our Natural Environment;</i> <i>Our Built Environment;</i> <i>Strong financial management.</i>
<b>Financial Cost</b>	There is no immediate direct financial cost to the Council relating to the approval of the new policy.
<b>Relevant Select Committee</b>	Public Safety & Transport
<b>Relevant Ward(s)</b>	All

### RECOMMENDATIONS

That the Cabinet

- 1) Approves the adoption of the London Borough of Hillingdon Enforcement Policy
- 2) Instructs officers to review the Policy in 2024

## Reasons for recommendation

The recent alignment of the Council's enforcement functions into one Corporate Directorate has enabled reviews of working practices and the refinement and improvement of current procedures. This policy has been drafted with input from the Council's regulatory and enforcement teams and will serve as a framework to guide officers and decision makers on enforcement principles and standards.

The adoption of the policy will help to ensure a consistent approach to enforcement across the Council's regulatory and enforcement teams. The policy will set out the guiding principles which the Council will follow when considering enforcement actions to ensure fairness, consistency, necessity and proportionality.

Policies should be reviewed from time to time to ensure that they reflect the current legal framework and promote best industry practice.

## Alternative options considered / risk management

To not have an Enforcement Policy. This could leave the Council vulnerable to inconsistencies in approach to enforcement actions and could be the subject of legal challenge which could weaken prospects for successful enforcement.

## Select Committee comments

None at this stage.

## SUPPORTING INFORMATION

- 1) Regulatory and enforcement services frequently need to demonstrate that their actions are consistent with legal requirements and standards, public interest and government guidance. Enforcement policies provide a consistent decision-making framework and commonly form part of the policy framework of a local authority.
- 2) This enforcement policy has been formed by the Council's regulatory and enforcement teams which have come together under the Corporate Directorate changes. The placement of all these services into one directorate ensures that the Council's regulatory enforcement actions are approached with the same levels of consistency giving residents and businesses confidence in how the Council will deal with non-compliance issues.
- 3) The aims of the policy are to:
  - a. Provide a clear and concise enforcement framework to regulatory officers
  - b. Ensure consistent enforcement that is proportionate to the risks involved
  - c. Acknowledge the shared enforcement role between different Council teams and external regulators
  - d. Recognise the alternatives to enforcement by education and proactive engagement

- e. Commitment to the five core principles of enforcement: proportionality, accountability, consistency, transparency, targeted.
- 4) The policy recognises the range of enforcement options available to the Council and promotes the principles which must be applied when considering matters of non-compliance.

### **Financial Implications**

There is no immediate financial cost associated with the recommendations outlined in this report. Should Cabinet approve and adopt the new London Borough of Hillingdon Enforcement Policy, consideration of potential future resourcing requirements relating to its implementation will be undertaken (together with the associated funding options available). This links in with the current ongoing strategic review of the Council's enforcement functions/structures.

## **RESIDENT BENEFIT & CONSULTATION**

The introduction of this policy will give a clear and consistent approach to enforcement which will inform residents of how the Council will investigate matters and deal with issues on their behalf. The policy framework will also inform residents of the service they can expect from Council enforcement teams.

## **CORPORATE CONSIDERATIONS**

### **Corporate Finance**

Corporate Finance has reviewed the report and concurs with the finance implications set out above, that there are no direct cost implications to the recommendations.

### **Legal**

The policy has been fully reviewed by the prosecutor at the Council in line with all relevant legislative frameworks, guidance and protocols.

### **Comments from other relevant service areas**

All comments from relevant enforcement teams have been included in the enforcement policy which has been formulated as part of the Enforcement Transformation working group.

## **BACKGROUND PAPERS**

NIL

This page is intentionally left blank





HILLINGDON  
LONDON

# **London Borough of Hillingdon Enforcement Policy**

*Draft for adoption October 2021*

## Contents

1	Introduction .....	3
2	Activities within scope .....	3
3	Principles of Enforcement .....	4
4	Governing Legislation and Codes .....	5
5	Delegation of Authority .....	6
6	Shared Enforcement Role .....	6
7	Data Protection .....	7
8	Primary Authority / Home Authority .....	7
9	Risk Assessment and Planned Inspections .....	8
10	Sufficiency of Evidence .....	8
11	Enforcement Options .....	9
12	Compliance Advice, Guidance and Support .....	10
13	Voluntary Undertakings .....	10
14	Statutory Notices .....	11
15	Fixed Penalty Notices .....	11
16	Injunctive Actions, Enforcement Orders etc. ....	11
17	Simple Cautions .....	11
18	Conditional Cautions .....	12
19	Prosecutions .....	13
20	Confiscation Proceedings .....	14
21	Refusal/Suspension/Revocation of Licences .....	14
22	Seizure of Food, Goods, Plant and Equipment .....	14
23	Integration with other Council Policies and Strategies .....	15
24	How Enforcement Decisions are Made .....	15
25	Complaints about the Councils Enforcement Activity .....	15

## **1 Introduction**

- 1.1 This policy sets out the London Borough of Hillingdon's approach to any non-compliance with relevant legislation enforced by the Council.
- 1.2 The Councils regulatory and enforcement teams are responsible for ensuring compliance with a vast range of legislation which aims to protect the rights and quality of life for residents, businesses, and visitors across the borough.
- 1.3 This policy sets out the guiding principles which the Council will follow when considering and taking enforcement actions to ensure fairness, consistency, necessary and proportionate decisions are made.

## **2 Activities within scope**

- 2.1 This policy will be used by all Officers and teams engaged with enforcement action across the Council by providing clear and concise guidance to enforcement officers across the following functions and services:
  - Animal Welfare
  - Environmental & Public Health
  - Building Control
  - Planning
  - Trading Standards
  - Licensing
  - Imported/Exported Food and Feed
  - Port Health
  - Food Safety
  - Public Safety
  - Noise and Nuisance control
  - Highways and Street Scene
  - Housing
  - Anti-Social Behaviour
- 2.2 Whilst this policy contains the overarching principles of enforcement for these areas, individual service areas may have their own specific legislative policies which form part of the Council's Policy Framework. The Council will ensure consistency between all policy areas on enforcement principles.

### **3 Principles of Enforcement**

- 3.1 The Council is fully committed to the five core principles of good regulation as required by the Department of Business Innovation and Skills Regulators Code. However, in certain instances, it may conclude that a provision in the Code is either not relevant or is outweighed by another provision. Any decision to depart from the Code will be properly reasoned, based on material evidence, and documented.
- 3.2 Proportionality – The Council will ensure that enforcement action is proportionate to the seriousness of the alleged offence or breach. The Council will always take into account the individual circumstance of the case when considering action.
- 3.3 Accountability – All actions that the Council takes will be open to public scrutiny and the Council will ensure that there are clear and accessible policies and complaints procedures where concerns can be raised and investigated.
- 3.4 Consistency – The Council will carry out its enforcement functions in a fair and consistent manner. Previous cases and compliance actions will be considered when deciding how compliance should be achieved and sanctions imposed.
- 3.5 Transparency – Open sources of advice and guidance will be available from all relevant service areas to advise residents and businesses on compliance requirements. The information will be clear and, in a format where it can be easily understood.
- 3.6 Targeted – The Council will operate an intelligence led approach to enforcement activity reflecting local needs, national priorities, or repeated instances of complaint/non-compliance.
- 3.7 Public Interest Test – Once the evidential thresholds have been met, the Council will consider whether the pursuit of enforcement sanctions is in the public interest. Suspected criminal offences should not automatically be the subject of prosecution, but prosecution should follow wherever it appears that the offence or its circumstances is or are of such a character that a prosecution is required in the public interest. Each case will be considered on its own merits. In considering whether actions are in the public interest, the Council will have regard to the following factors:
- The seriousness of the contravention or breach i.e. the detriment or potential detriment, risk of loss, actual loss, number of parties affected and risk of harm;
  - The likelihood of achieving compliance i.e. the person’s ability to comply and efforts made to comply;
  - The age of the offence or breach (staleness) – (unless the offence is serious; the delay was caused by the defendant; the offence or breach has only recently come to light; or the complexity of the offence breach required a lengthy investigation);

- If there is an element of fraud, intent, or gross negligence in commission of the offence or breach the risk of re-offending;
- The offence, though not serious in itself, is widespread in the area;
- The frailty or youth of any individual likely to be proceeded against (always bearing in mind the seriousness of the offence or breach);
- The previous history of the business or individual – including previous advice given;
- Whether the victim was vulnerable, put in considerable fear, suffered personal attack, damage or disturbance;
- Whether or not violence was used/threatened;
- Whether or not the offence or breach was committed against a person serving the public (e.g. obstruction/assault of Council staff);
- Important but uncertain legal points may have to be tested by way of prosecution;
- Any relevant case law.

3.8 Public Sector Equality Duty - All enforcement action will be undertaken without regard to race, colour, religion, gender, or sexual orientation. Enforcement action taken against an individual or organisation will be consistent with the Council's commitment to equality and diversity. If necessary, during formal enforcement action, correspondence will be translated and interpreters provided.

## **4 Governing Legislation and Codes**

4.1 The Council will comply with and follow the requirements laid out in the following legislation and codes when considering the approach to investigations and enforcement:

- Regulators Code (Better Regulation Delivery Office) 2014
- Human Rights Act 1998
- Data Protection Act 2018
- Regulatory Enforcement and Sanctions Act 2008
- Code for Crown Prosecutors
- Regulation of Investigatory Powers Act 2000 (RIPA)
- Investigatory Powers Act 2016
- Police and Criminal Evidence Act 1984
- Public Interest Disclosure Act 1998
- Criminal Procedure and Investigations Act 1996
- Criminal Justice and Police Act 2001
- Attorney General's Guidelines on Disclosure 2020
- Pre-action protocol for Possession claims by Social Landlords

4.1 These Acts and associated guidance dictate how evidence is collected and used and give a range of protections to both investigators and defendants.

## **5 Delegation of Authority**

- 5.1 The Council's scheme of delegations specifies the extent to which enforcement powers are delegated to officers and elected members.
- 5.2 Officers are authorised to carry out enforcement in all cases to a level which is considered by the Council, to be appropriate given their training, qualifications and/or experience.

## **6 Shared Enforcement Role**

- 6.1 Where there is a shared enforcement role, officers will liaise fully with any relevant enforcement agencies at the earliest possible stage to agree a suitable approach to any enforcement action. Partners will be kept updated with the progress of any shared enforcement matter, as necessary. The Council may also carry out joint operations with partner enforcement agencies from time to time.
- 6.2 Where the Council shares or has a complementary role with other regulatory agencies we will seek to avoid duplication through joint/coordinated inspection or data sharing. The Council has entered into a number of agreements and protocols with other key regulators concerning the division of enforcement responsibility and data sharing.
- 6.3 Partner enforcement agencies include, but are not restricted to:
- Metropolitan Police Service
  - Home Office
  - UK Border Force
  - HMRC
  - Health & Safety Executive
  - Food Standards Agency
  - Environment Agency
  - Gambling Commission
  - London Fire Brigade
  - DEFRA
  - DHSE
  - Planning Inspectorate
  - Medicines and Healthcare products Regulatory Agency (MHRA)
  - Brand representatives (Trading Standards)
- 6.4 Officers will endeavour to co-ordinate visits and actions with other such agencies to achieve the most efficient and effective outcomes and to minimise inconvenience for those who are being visited, inspected or subject to enforcement action.
- 6.5 Information concerning allegations outside the remit of the services covered by this

policy may be referred to the appropriate enforcement authority with any contact details (by agreement) to enable that agency to investigate the allegation.

6.6 For complex cases which cross-cut a number of Council teams and services, the Council will share information internally which may be relevant in achieving compliance or enforcement outcomes.

6.7 Where Council teams share data and intelligence, it will take a collaborative approach to 'problem solving' and will include a wide range of partners e.g. Adult Social Care/Community Mental Health and numerous multi-agency groups e.g. CR MARAC who can play an effective role in securing sustainable outcomes. There are also added benefits from multi-agency / collaborative working including:

- Bringing together different skills, perspectives and resources
- Promoting collective responsibility
- Focussing on common objectives
- Facilitating effective and compliant information sharing
- Avoiding duplication of effort and service 'gaps'

6.8 Information of enforcement cases where the Council has decided to serve a notice or commence a prosecution may be passed to potential property purchasers via the Local Land Charges Register, and CON 29 enquiry.

## **7 Data Protection**

7.1 The Council may from time to time need to share information with other local and national agencies and law enforcement in order to deliver its services or fulfil its statutory duties. Where this occurs, the Council has robust data sharing protocols in place with these bodies and it will only share individuals' personal data in circumstances where it is necessary for its public duties, it is either required or allowed by law to do so and it is in the public interest.

7.2 The transparent use of data as reflected in individual published Privacy Notices is listed on the Council's website. The benefits and use of information sharing protocols between services and partner agencies is set out in the context of prevention, intervention, enforcement and rehabilitation and under the Crime & Disorder Act 1998.

## **8 Primary Authority / Home Authority**

8.1 Where relevant, enforcement activities will be carried out in accordance with the procedure laid down within the Primary Authority Scheme. Where the Primary Authority Scheme is not applicable, officers will have regard to the Home Authority Principle, to promote good enforcement practice and to reduce burdens on business.

## **9 Risk Assessment and Planned Inspections**

9.1 Risk assessment will underpin the approach to planned regulatory activity (comprising inspections, data collection, advice and support, enforcement, and sanctions). Resources will be allocated where they will be most effective and will rate risks against regulatory outcomes. Officers will base risk assessments on all available data and consider:

- The potential impact of non-compliance on regulatory outcomes;
- The likelihood of non-compliance (where we will take into account; past compliance and potential future risks and willingness to comply)
- The potential for fraud.

9.2 The Council accepts that its enforcement priorities should be focused on those persons, premises or businesses whose activities give rise to the risks which are most serious or least well controlled.

9.3 Inspections are planned using a risk based approach and in some instances determined by codes of practice and/or practice guidance. There may be instances where premises are considered to be low risk and as such are excluded from planned inspection programmes in order to free up resources to deal with other priorities. Low risk businesses may be given advice or guidance to help them run their business safely and with the least impact on their local environment. A planned inspection approach involves premises or activities with the most severe hazards, highest risks, poorest compliance and worst management being inspected more frequently than lower risk premises.

9.4 In some cases it may be necessary to restrict the level of investigation and/or resources deployed if it is not considered reasonably possible to obtain sufficient evidence to proceed, or, if it is decided that the Council cannot, on resource grounds deal formally with areas of low priority enforcement. Complainants will be given information and advice on alternative possible solutions, whenever possible, in these circumstances.

## **10 Sufficiency of Evidence**

10.1 In considering the instigation of legal proceedings, or the issuing of a caution, the immediate consideration is the sufficiency of available admissible evidence to substantiate the allegation that a criminal offence has been committed. The test to be applied is whether there is a realistic prospect of a conviction, bearing in mind any statutory defences available to the defendant and any other factors that would preclude a successful conviction.



- 10.2 In determining the sufficiency of evidence, consideration will be given to:
- Availability of essential evidence – is it likely that the Court will exclude evidence (e.g. due to breaches of procedure or because it is hearsay);
  - Reliability of the evidence;
  - Credibility of witnesses (including previous convictions, dubious motive);
  - The admissibility or reliability of any admission or confession. (e.g. defendant's age, intelligence, lack of understanding etc).
- 10.3 In determining the admissibility of evidence, regard will be given to the requirements of the Police and Criminal Evidence Act 1984 and the Criminal Procedure and Investigations Act 1996 and associated Codes of Practice.
- 10.4 Depending on the nature of the legal proceedings, the Council will always ensure that the minimum evidential threshold is met as follows;
- Civil – on the balance of probabilities
  - Criminal – beyond reasonable doubt

## **11 Enforcement Options**

- 11.1 Enforcement officers will exercise discretion in the use of their range of powers and any policy should not restrict the officers in the use of their judgement based on expertise, experience, and delegations.
- 11.2 Officers will normally consider a staged approach to enforcement. However, this policy recognises that formal action in the first instance can be appropriate, in certain circumstances.
- 11.3 There are a range of enforcement options available to the Council including, but not limited to:
- Compliance Advice, Guidance and Support
  - Voluntary Undertakings
  - Statutory Notices
  - Fixed Penalty Notices
  - Injunctive Actions, Enforcement Orders etc
  - Possession action
  - Simple Caution
  - Conditional Caution
  - Prosecution
  - Confiscation Proceedings under the Proceeds of Crime Act 2002
  - Refusal/Suspension/Revocation of Licences
  - Seizure of plant, food, equipment and goods

## **12 Compliance Advice, Guidance and Support**

- 12.1 The Council will provide advice, guidance and support on compliance matters as a first response in many cases where a positive regulatory or contractual outcome can be achieved. Formal advice may be made in the form of a warning or advisory letter to identify the remedial actions which need to be taken to secure compliance quickly and efficiently. The Council also recognises that many businesses and individuals will require a level of education and support to bring their activities in line with statutory and contractual requirements.
- 12.2 Officers will normally use this option where the potential impact of non-compliance is minor, there is reasonable confidence that the business or individual will take appropriate corrective action and where this is the first contact with them on the issue. As far as the law allows, officers will take account of the circumstances of the case and the conduct of the business or individual, when considering action.
- 12.3 Officers will provide advice clearly and simply. Officers will make it clear that they are either making a recommendation in relation to best practice or giving advice on meeting legal requirements. Significant advice on legal requirements and recommendations on best practice will be confirmed in writing. Where appropriate, legal requirements will be confirmed by service of a Statutory Notice.
- 12.4 Officers may issue written warnings to make clear that any further breaches of legislation will be viewed seriously and that these may be subject to enforcement action.
- 12.5 Wherever possible, officers will try to provide written advice on good practice, industry guidance or technical information where there is a need for help in meeting requirements. However, issuing advice or warnings does not remove the necessity for the Council to serve formal notices in certain circumstances, to ensure that compliance is achieved within a prescribed period.
- 12.6 Notwithstanding that in the most serious of circumstances, it will be appropriate to impose more formal enforcement actions and the Council will consider the principles outlined in Section 6 of this policy.

## **13 Voluntary Undertakings**

- 13.1 The Council has the discretion to accept voluntary undertakings to rectify and prevent breaches. Voluntary undertakings may include a commitment from the person/business to make changes to their operation or behaviour to bring them in line with regulatory requirements. A voluntary undertaking is likely to include a timescale to comply with any failures to comply likely to result in formal enforcement action.

## **14 Statutory Notices**

- 14.1 The Council has powers to issue a range of improvement, Abatement, Suspension, Prohibition, Closure etc. notices which require certain actions by those who have been served with a notice.
- 14.2 Any statutory notice will clearly set out the legal powers, exact actions that are required and a timescale to comply with the notice. Notices will also include rights of appeal and the likely consequences of non-compliance with the notice.
- 14.3 Failure to comply with notices are likely to result in more formal enforcement action being escalated.
- 14.4 The Council also has powers to apply to the Court for Orders following the service of certain notices. Owners/occupiers/businesses/tenants will be advised of all stages of these formal proceedings.

## **15 Fixed Penalty Notices**

- 15.1 The Council has powers to issue fixed penalty notices for some offences. A FPN does not appear on an individual's criminal record but any non-payment or unsuccessful appeal of a notice is likely to result in a Criminal Prosecution or Civil Enforcement action.
- 15.2 Where a FPN is paid, the Council will not pursue the matter any further and will consider the matter closed.
- 15.3 Where repeat FPN's are issued for the same offence, the Council does have discretion to pursue a prosecution.

## **16 Injunctive Actions, Enforcement Orders etc.**

- 16.1 In some circumstances, the Council may seek formal orders or injunctions from the Court to ensure that a breach is rectified or to prevent a breach from occurring.
- 16.2 Non-compliance with Court orders usually carries severe penalties i.e. imprisonment.

## **17 Simple Cautions**

- 17.1 Where the evidential thresholds are met and the enforcement principles have been satisfied, the Council may decide to issue a Simple Caution as an alternative to prosecution for some less serious offences, where the person has admitted to the offence and is willing to accept a caution. The Council will also consider whether it is in the public interest to offer a simple caution in the circumstances.

17.2 Home Office Circular 016/2008 states that the purpose of a caution is:

- To deal quickly and simply with less serious offenders;
- To deal with first time offenders;
- To divert them from unnecessary appearances in the criminal courts; and
- To reduce the chances of them re-offending.

17.3 The following conditions must be fulfilled before a simple caution is administered:

- There must be evidence of the suspected offender's guilt, sufficient to give a realistic prospect of conviction;
- The suspected offender must admit the offence;
- The suspected offender must understand the significance of the caution and give an informed consent to being cautioned.

## **18 Conditional Cautions**

18.1 Where the evidential thresholds are met and the enforcement principles have been satisfied, the Council may decide to issue a Conditional Caution as an alternative to prosecution for some less serious offences. A conditional caution allows the relevant prosecutor to decide to give a caution with one or more conditions attached. When considering whether to administer a conditional caution, regard will be given to Criminal Justice Act 2003 and the Code of Practice for Adult Conditional Cautions. The Council will also consider whether it is in the public interest to offer a simple caution in the circumstances.

18.2 The following five requirements must be fulfilled before a conditional caution can be administered:

- I. There must be evidence that the offender has committed an offence;
- II. The relevant prosecutor must determine that there is sufficient evidence to give a realistic prospect of conviction and that a conditional caution should be given to the offender for that offence;
- III. The offender must admit to the relevant prosecutor that they have committed the offence;
- IV. The relevant prosecutor must explain the effect of the conditional caution and warn the offender that failure to comply with any of the conditions may result in a prosecution for that offence and;
- V. The offender must sign a document containing the details of the offence, an admission and consent to be given a conditional caution – the details of the conditions must also be attached to the conditional caution.

18.3 The conditions of a conditional caution may be reparative, rehabilitative or punitive (financial penalties are limited to a maximum of £250.00). The appropriate conditions will be decided on a case by case basis. Regard will be given to the core principles of good regulation and will take into account the interests of any victims, the community and the suitability of the offender to comply with the conditions.

18.4 Where an offender fails to comply with any of the conditions, the matter will proceed to prosecution.

## **19 Prosecutions**

19.1 A prosecution will be undertaken when the evidence passes the “Evidential Test” and it is in the public interest to do so. Prosecutions will only be considered where the Council has sufficient evidence to provide a realistic prospect of conviction against the defendants.

19.2 In general, the Council will bring prosecutions:

- I. When the offence is a serious one in the context of the legislation being enforced; and / or
- II. When the offence is committed or has continued contrary to advice, warnings, notices, or Statutory Notices given by the Council; and / or
- III. When the opportunity to discharge liability to prosecution by way of Fixed Penalty Notice has not been taken.

19.3 It must be recognised that each individual case is unique and will be considered on its own circumstances and merits. However, there are general principles that will apply in all cases.

19.4 The decision to prosecute will have regard to the criteria set down in the Code for Crown Prosecutors, issued by the Crown Prosecution Service.

19.5 Where officers consider a prosecution, the following criteria will be taken into account as appropriate:

- Sufficiency of evidence and;
- Public Interest Criteria.

19.6 The following considerations will apply where appropriate:

- I. Prosecution of Directors of Companies - Where allowed by the legislation being enforced, the prosecution of Directors, Managers or similar officers of

companies will be considered where any offence by the company was committed due to their consent, connivance or neglect.

- II. Prosecution of Employees – this will be considered only in exceptional cases (e.g. where an employee has failed to follow employer’s instructions or has been deliberately obstructive). In all such cases, it must be borne in mind that an employee may be at risk of losing their employment.
- III. Obstruction – prosecution will be considered in all cases of obstruction but in particular where it has resulted in additional work and costs to the Authority.

## **20 Confiscation Proceedings**

- 20.1 The Council will make applications under the Proceeds of Crime Act 2002 to restrain and/or confiscate the assets of an offender where applicable. The purpose of any such proceedings is to recover any financial benefit that the offender has obtained through criminal conduct.

## **21 Refusal/Suspension/Revocation of Licences**

- 21.1 Where the Council has licensed a person, premises or activity under a licensing regime, the Council may seek to remove or suspend that licence where there is a breach or poor level of compliance with conditions or other requirement.
- 21.2 The Council may also consider refusing a licence where matters of non-compliance come to light before or during any application period.
- 21.3 Where any decision is taken to refuse/suspend or revoke a licence, it will be in line with the statutory requirements of the licensing regime and any separate policy made under it.

## **22 Seizure of Food, Goods, Plant and Equipment**

- 22.1 The Council has a range of powers to seize goods where offences are suspected.
- 22.2 Portable equipment, such as music systems and other machinery, may be seized if nuisance continues following the service of a statutory abatement notice and it is considered necessary to stop the nuisance at the time, or to prevent likely repeat occurrences, prior to any Court hearing. Where equipment is seized, the Council will always seek to prosecute and may use legal provisions to retain the equipment permanently.
- 22.3 Where seizures are made, the Council will provide a seizure notice outlining the legal powers, reason for the seizure, appeal process and what happens next.

## **23 Integration with other Council Policies and Strategies**

- 23.1 The Council has a range of Policies and Strategies which form the framework of our statutory functions and powers. Where enforcement action is taken under this policy, the Council will ensure that those actions are aligned with the statements and intentions contained within other Council policy documents.
- 23.2 Enforcement decisions made under this policy will also be made in line with the Councils Prosecutions & Sanctions Policy as agreed by Cabinet, October 2020.
- 23.3 Relevant Council policies include, but not limited to: The Local Plan, Statement of Licensing Policy, Anti-bribery Policy, Anti-Money Laundering Policy, Surveillance Policy etc.

## **24 How Enforcement Decisions are Made**

- 24.1 The Council will make a range of considerations when considering enforcement actions including the risk and seriousness posed by the offending.
- 24.2 All formal enforcement decisions will be documented along with clear justification for making the decision.

## **25 Complaints about the Council's Enforcement Activity**

- 25.1 The Council has a Corporate Complaints Procedure, easily accessible to businesses, the public and consumer groups and details can be found on the Council website [www.hillingdon.gov.uk](http://www.hillingdon.gov.uk).
- 25.2 Certain enforcement processes also include clear appeal pathways which should be exhausted before the formal complaints handling procedure is accessed.

This page is intentionally left blank



## CONSULTATION ON CHANGES TO SCHOOL ADMISSIONS ARRANGEMENTS

<b>Cabinet Member(s)</b>	Councillor Susan O'Brien
<b>Cabinet Portfolio(s)</b>	Cabinet Member for Families, Education, and Wellbeing
<b>Officer Contact(s)</b>	Planning, Dan Kennedy, Environment, Education & Community Services
<b>Papers with report</b>	Appendix 1 - Changes to School Measuring Points Appendix 2 – Existing School Admissions Criteria for Community Schools in Hillingdon

### HEADLINES

<b>Summary</b>	<p>Hillingdon Council has a statutory responsibility to secure sufficient early years and school places for children resident in Hillingdon. A review of admissions to reception school places at Hillingdon schools over the last four years evidence that there is a residual risk that our current admissions criteria may no longer serve the purpose of reducing the risk of applicants not receiving a school placement. As an education authority, the Council must plan for sufficient school places and efficient use of resources. Forecasting of primary school places indicates a steady fall in demand in future years.</p> <p>Following review and discussions with relevant community primary schools, the Council is therefore proposing for consultation changes to the PANs for relevant schools to address the findings of the review to provide continuing access for residents to their local school and improve stability of pupil numbers and budgets.</p>
<b>Putting our Residents First</b>	<p>This report supports the council objectives of: <i>Our People and Strong financial management</i>. The recommended changes to the school admissions criteria contained in this report will support the aim that all children in Hillingdon can be offered a local school place as close to home as possible and ensure effective, and best use of the investment the Council has made to expand primary schools across the Borough.</p>
<b>Financial Cost</b>	<p>There are no direct financial implications from the recommendations contained in this report. However, schools with excess places above the local demand can experience part-empty classes which are not financially viable, stretching school budgets to cover the staffing and limiting resources available to all pupils. This can lead to an overall deficit and the school seeking a loan from the council Dedicated Schools Grant for maintained schools (community, foundation, and VA) or to their Academy Trust.</p>

Relevant Select  
Committee

Families, Education and Wellbeing

Ward(s) affected

All

## RECOMMENDATIONS

That Cabinet:

1. Notes the findings from a review by officers of the school admissions criteria for community schools in Hillingdon.

### Schools Admissions Criteria

2. Recommends the following proposals for changes to be made to the school admissions criteria and authorises officers to undertake a full consultation exercise in relation to them:
  - a) To amend the point of measurement for school applications for Whitehall Infant & Nursery School (set out in Appendix 1).
  - b) To amend the point of measurement for school applications for Yeading Infant & Junior School (set out in Appendix 1).
3. Agrees that no further material changes are required to the admissions criteria for community schools (set out in Appendix 2).

### Published Admission Number

4. Recommends the following proposals regarding the Published Admissions Number and authorises officers to undertake a full consultation exercise in relation to them:
  - a) To reduce the Published Admission Number for Harefield Infant School from 90 to 60.
  - b) To reduce the Published Admission Number for Harefield Junior School from 90 to 60.
  - c) To reduce the Published Admission Number for Harlyn Primary School from 90 to 60.
  - d) To reduce the Published Admission Number for Field End Infant School from 120 to 90.

5. **Agrees to receive a further report at its 17th February 2022 meeting for the purpose of considering the consultation responses and determining a set of new admissions arrangements for community schools in Hillingdon with new Planned Admissions Numbers for stated Community schools which all are to take effect from 1 September 2023.**
6. **Agrees that the Corporate Director, Planning, Environment, Education and Community Services, in consultation with the Cabinet Member for Families, Education and Wellbeing, submit a response from the Authority following formal consultation from non-community schools to reduce their Planned Admissions Numbers.**

### Reasons for recommendations

1. As part of the strategic education function of the Local Authority, Hillingdon Council has a statutory responsibility to secure sufficient early years and school places to meet the needs of children resident in the Borough. In October 2020 the School Placement and Admissions team consulted and made changes to the admissions criteria for community schools to take effect from 1 September 2021.
2. Based on a refresh of the school places forecast there is a need to reduce the published admission numbers in four community primary schools, each by 30 places. This is due to demographic changes leading to declining pupil rolls and Reception intakes, and into Year 3 into the Junior school, over the past few years which is projected to continue for another few years. In each school, there would be no difference for current pupils after the proposed change takes effect from Reception 2023, and there would be sufficient places to meet future demand from their siblings and other local parents.
3. Following a review of school places, it is proposed to consult to reduce the Published Admission Numbers for:
  - Field End Infant School - from 120 to 90 from 2023. All local residents will still be able to access places there. This reduction will also reduce the distance priority radius from **1250m to 1000m** in line with our admissions arrangements.
  - Harefield Infant School - from 90 to 60 from 2023. All local residents will still be able to access places there. This reduction will also reduce the distance priority radius from **1000m to 750m** in line with our admissions arrangements.
  - Harefield Junior School - from 90 to 60 from 2023. All local residents will still be able to access places there. This reduction will also reduce the distance priority radius from **1000m to 750m** in line with our admissions arrangements.
  - Harlyn Primary School - from 90 to 60 from 2023. All local residents will still be able to access places there. This reduction will also reduce the distance priority radius from **1000m to 750m** in line with our admissions arrangements.

### Alternative options considered / risk management

4. The proposals presented in this report are intended to be reasonable, clear, objective, procedurally fair and comply with all relevant legislation to mitigate the potential future risk that a small number of children living in Hillingdon may not be guaranteed a school place as close to home as possible. Options have been considered to address this risk, some of which are specific to a location in the Borough. Where alternative options have been considered therefore, these are set out in the body of the report.
5. The proposals for reductions in PAN are to improve schools' ability to efficiently plan their staffing and educational provision and not reducing could lead to schools suffering financial pressures leading to deficits, which in the community schools could then require a loan, further adding to the deficit in the Dedicated Schools Grant.

### **Select Committee comments**

6. The Families, Education and Wellbeing Select Committee has scheduled this matter on its multi-year work programme and will consider the proposals as part of the consultation process, before a final report is brought back to Cabinet in 2022 for decision.

## SUPPORTING INFORMATION

### Summary

7. Hillingdon Council has a statutory responsibility to secure sufficient early years and school places for children resident in Hillingdon. Over the last ten years the Council has worked closely with schools in Hillingdon to successfully deliver an ambitious programme of school expansion to ensure every child living in Hillingdon can be offered a school place as close to home as possible.
8. A review of admissions to reception school places at Hillingdon schools over the last four years evidence that there is a residual risk that our current admissions criteria may no longer serve the purpose of reducing the risk of applicants not receiving a school placement. As an education authority, the Council must plan for sufficient school places and efficient use of resources. Forecasting of primary school places indicates a steady fall in demand in future years.
9. As an education authority, the Council must plan for a sufficiency of places and efficient use of resources. There has been a slight decline in demand across the primary sector since 2018, with some fluctuations, but the overall level of primary surplus places continues to be too high and is pooling in a few schools. Each year the Council reviews the number of places against pupils rolls and projections and considers changing Published Admission Numbers (PAN) in some schools, where this may be needed. Across the borough, small annual changes are needed to meet parental demand, up and down. This ensures schools and the authority best meet the needs of all pupils across the Borough and make effective use of resources in schools and between them. The PAN is the 'operating figure', and the physical building remains the same. Academy, Foundation and VA schools make their own decisions, and they must consult the Council and others on proposed reductions, but their Governors/Trusts can agree temporary or permanent increases. The review has included all primary and secondary schools. The Cabinet is the relevant authority for the community primary schools.
10. Following review and discussions with relevant community primary schools, the Council is therefore proposing to reduce the Published Admission Number (PAN) for Field End Infants from 120 to 90, Harefield Infant School from 90 to 60, Harefield Junior School from 90 to 60, and Harlyn Primary School from 90 to 60. All PAN reductions will come into effect from 2023 and there will be sufficient places to ensure that local residents and siblings can access the school. This reduction will also reduce the distance priority radius from 1250m to 1000 for Field End Infant School and 1000m to 750m for the other three schools in line with our admissions arrangements.
11. The report details proposed changes to points of measurement for three different schools, to ensure accuracy of their school building usage for admission measurement purposes.
12. In addition, the Cabinet report details known information on four non-community schools, that are likely to consult to reduce their PAN. In each, they are already mainly operating most year groups at the proposed lower level. The LA will be formally invited to respond but if no serious issues are raised in responses to their consultations, LA officers are likely

to be in support of these reductions, and will subsequently seek Cabinet Member agreement to support these consultations, which will meet the needs of residents.

13. Cabinet is, therefore, asked to consider the proposed changes to the PANs for the relevant schools to address the findings of the review to provide continuing access for residents to their local school, and improve stability of pupil numbers and budgets.

### **The Statutory School Admissions Code**

14. The purpose of the statutory School Admissions Code is to ensure that all school places for maintained schools (excluding maintained special schools) and academies are allocated in an open and fair way. The Code contains mandatory requirements, such as setting a Published Admissions Number for each school. The admission arrangements to community schools are determined by the Local Authority as the 'admission authority.'
15. In drawing up the admission arrangements to schools, admission authorities must ensure that the practices and the criteria used to decide the allocation of school places are fair, clear and objective. Parents should be able to look at a set of arrangements and understand easily how places for that school will be allocated. All schools must have admission arrangements that clearly set out how children will be admitted. The admission authority for the school must also set out in the arrangements the oversubscription criteria against which places will be allocated at the school when there are more applications than places and the order in which the criteria will be applied.
16. To ensure that the criteria applied in prioritising access to community schools which are oversubscribed remains procedurally fair, objective and clear, a review of the criteria has been undertaken using four years of Hillingdon admissions data to primary school reception places. The focus of the review sought to identify any residual risk that the Council would not fulfil its statutory duty to ensure every child is offered a school place.
17. The review considered the following areas:
  - Accurate points of measurement for school applications using the Geographical Information System and accuracy of school building usage for measurement purposes.
  - Ensure there are sufficient school places in Hillingdon and eliminate financial constraints where evidence shows a continued and sustained reduction in admissions.

## Reduction of Published Admissions Numbers

18. All community schools have a Published Admissions Number (PAN) in accordance with the School Admissions Code 2021. This is the number of school places that the admission authority must offer in each relevant age group (Reception, Year 3 for Junior and Year 7 for secondary) of a school for which it is the admission authority. Admission numbers are part of a school's admission arrangements.
19. As an education authority the Borough must plan for a sufficiency of places and efficient use of resources. The demand and capacity across the primary sector have been variable from year to year since 2012. Currently there are unusually high levels of movement in, out and around the borough following the Pandemic and Brexit and new arrivals into accommodation near Heathrow airport. However, it is clear that the level of overall surplus places in the primary sector continues to be too high and is concentrated in a few schools. To ensure schools and the authority best meet the needs of all pupils across the Borough and make effective use of resources in schools and between them, these four reductions in Community school PAN are proposed.
20. Currently there are 16% of vacant places across all primary schools. Pupil numbers will always fluctuate but the aim is to have 5-10% vacancies which will ensure there will be places to meet parental demand in each area and for those moving in mid-year, and secure stability for all schools. Having several schools with a PAN over 30 pupils above the level of their local demand means some schools attract a few pupils from further away requiring more classes to be run, but they are not economic, with a risk that if pupils join or leave, a class may need to be opened or closed. This disrupts education for all the pupils in the year group. To balance school budgets, classes need to include 25 or more pupils. Schools with declining or volatile rolls face big changes in their annual budget, and consequent cuts in staff and risk financial deficit. The aim of PAN reductions is to match the operational level of schools to local demand and improve the focus of resources in each school on their pupils and reduce the risk of deficits. Meanwhile the physical capacity will remain available if demand rises, when it is possible to increase the PAN immediately, without consultation. It is considered prudent that in future PANs should be increased temporarily a year at a time, whilst parental demand is kept under review.
21. These schools have all been concerned about changes in their local demand for the past few years and all the governing bodies support the reduction since it will enable the school to focus their budget and resources better for pupils, so supporting school improvement. All the governing bodies agree they will agree an increase should local demand for places rise. Importantly, though the process to reduce PAN requires considerable data and consultation, it is easy to reverse, so admissions authorities can quickly respond to a rise in demand and decide to admit over PAN on a temporary or permanent basis.

22. Separately, up to four Academy Trust and Foundation schools in different areas may also propose to consult on a reduction of 1 FE; Hillside Infant School from 90 to 60; Brookside Primary School from 90 to 60; Wood End Park Academy from 150 to 120; and Oak Wood School from 270 to 240. These have been discussed with officers and would not impact on residents' access to their local schools and proposals reflect that the schools are already operating in most year groups at 1FE under their current PAN. They would each run their consultations and then decide on proposals including consulting the authority. All the Trusts hope to be able to increase numbers in future if local demand grows.
23. Hillingdon has one of the largest pupil populations in London with growth in some areas and 51,318 pupils in the May 2021 census. Especially at secondary, a significant minority of resident parents choose schools out of the LA and other pupils come to school from other LAs, so the total number of pupils managed by admissions and other central services is higher. The past few years of roll volatility now require annual review and regular changes in PAN, up and down, to adjust the 'operating capacity' of the schools since school finances are so challenging. Most London local authorities have agreed or are planning reductions in primary capacity and increases in secondary places. As the birth rate has slowed, reception numbers have plateaued since 2016 and new pupil roll growth will be from new housing and migration into various year groups, not just to reception. Over half of primary schools are full to capacity but the pockets of surplus places in a few schools continue to grow. The demographic changes in the borough, short and long-term impacts of Brexit, Covid and employment and affordability of housing are all factors being monitored.
24. Over the past year officers have reviewed all schools and discussed proposals with headteachers and governors in the four community schools. Headteachers have updated parents over the summer term in newsletters that a reduction in PAN was being considered, referencing that the schools already have many year groups operating at the proposed lower PAN and this proposal would give stability to classes and benefit pupils, and that siblings and other local parents would still be able to access the school. No parents expressed concerns. This was in advance of the formal consultation now being proposed.

## **Next Steps**

### **Proposal to change measuring points for 3 of our community schools.**

25. Within the current admissions criteria, priority is awarded to pupils based on distance from home to the school where over-subscription applies. In general, the closer the distance from home to school the higher the priority. The reference point at the school for calculating the distance from home to school is known as the 'measurement point'. 'Distance is measured in a straight line from the child's home address to the school, using co-ordinates from the Geographical Information System (GIS) which is based on ordnance survey data. Over the years schools have expanded and changed the use of buildings to accommodate pupil needs. Therefore, the School Placement and Admissions fully reviewed the measuring points for all community schools against the usage of the school buildings.



26. Following this review, we propose a change to the measuring points for Whitehall Infant and Nursery School, Yeading Infant and Nursery and Yeading Junior School. This is to ensure that the measuring points set for each of these schools is calculated at an accurate point in the school building. The review identified that although the original points of measurement are within the schools' grounds it would be more appropriate to adjust them to reflect the usage of the classes and pupils associated with the buildings. These proposals have been discussed and agreed with the school's leadership teams.

**Proposals to reduce Planned Admission Numbers in 4 community schools.**

- a. **Harefield Infant School from 90 to 60 Primary Planning Area 1 - Harefield**
- b. **Harefield Junior School from 90 to 60 Primary Planning Area 1 - Harefield**

27. Officers are proposing to reduce the Published Admission Number for Harefield Infant and Harefield Junior Schools, both from 90 to 60 from 2023. The schools are currently operating under one Executive Headteacher and one federated governing body. This reduction will also reduce the distance priority radius from 1000m to 750m in line with our admissions arrangements. This decision has been taken as the school has now been operating at under 60 in some year groups for several years so has a high level of vacancies, but also attracts some pupils from many miles away, for convenience but who could attend other schools more local to their homes. This has led to instability of classes and constrained school improvement and budgets.

28. The schools recently federated under one combined governing body and Executive Headteacher with a view to complete a merger in future. The governors support the changes in PAN as they will help secure the stability of the school roll and budget to underpin the ongoing good education provision for pupils.

29. This is the only primary planning area with only one primary provision in a separate Infant school and a Junior school sharing a site in the middle of the village. Harefield is relatively rural and isolated compared to the rest of the borough; the nearest primary schools are over two miles away. It is in the green belt with no new housing planned and a lower proportion of children than other areas. The local area provides up to 60 pupils a year. Having a PAN of 90 means some places are always empty, and each year some are taken by parents from far further away who travel to or through Harefield for work or other reasons and could find places closer to their home. In the past year groups have risen to over 70 but never to 90.

30. The overview of the PAN of the schools, rolls at the last census (May 2021) and offers made on National Offer Day in April for September 2021 Reception (and Year 3 in the Junior School) are shown in the table below.

PRIMARY PLANNING AREA 1		CENSUS MAY 2021 ROLLS										CONFIRMED RECEPTION/ YR 3 NUMBERS IN SEPTEMBER 2021
SCHOOL	PAN	Year R	Y1	Y2	Y3	Y4	Y5	Y6	TOTAL	IF FULL	% vacant	
Harefield Infant School	90	56	66	61					183	270	32.2%	47
Harefield Junior School	90				64	66	80	53	263	360	26.9%	59

### c. Harlyn School from 90 to 60 Primary Planning Area 2 – Northwood

31. The proposal is for consultation to reduce the Published Admission Number for Harlyn Primary School from 90 to 60 from 2023. The school has been recruiting at under 60 for some years. The September 201 Reception intake is 52. This reduction will also reduce the distance priority radius from 1000m to 750m in line with our admissions arrangements. This proposal reflects the school has now been operating at under 60 in some year groups for several years, reflecting fewer families in the area, so has a high level of vacancies. It also attracts some pupils from many miles away, for convenience but who could attend other schools more local to their homes and experiences pupil mobility in and out. All this has led to some years of tension in class planning and budget problems, since it hovers around 60 places in each year group with the risk of needing to open a third class, rearrange all the pupils and employ another teacher without sufficient funding. This has led to budget constraints that have limited extra activities for pupils. The school increased from 60 to 90 nine years ago and sustained higher numbers for around five years, but only once to 90. The proposal will give stability to aid improvements for all the pupils in the school.

The most recent census and roll data for the school and its local Planning Area are set out below:

PRIMARY PLANNING AREA 2		CENSUS MAY 2021 ROLLS										CONFIRMED RECEPTION NUMBERS IN SEPTEMBER 2021
SCHOOL	PAN	Year R	Y1	Y2	Y3	Y4	Y5	Y6	TOTAL	IF FULL	% vacant	
Harlyn Primary School	90	61	56	59	59	88	85	87	495	630	21%	52
Hillside Infant School	90	63	55	60					178	270	34%	
Hillside Junior School	60				50	62	62	57	231	240	4%	
Holy Trinity CofE Primary School	30	30	29	28	28	29	29	32	205	210	2%	
Frithwood Primary School	60	54	56	59	55	56	56	57	393	420	6%	

### d. Field End Infant School from 120 to 90 Primary Planning Area 5 – North Ruislip

The proposal for consultation is to reduce the Published Admission Number for Field End Infant School from 120 to 90 from 2023. The school is located close to the boundary with Harrow and there are many primary schools within one and two miles walk. Rolls have fallen over the past few years with several year groups one form entry below the existing PAN and the September Reception number is 81. It is clear the school should have a PAN of 90, until local demand rises. Field End Junior school currently has most year groups closer to 90 and converted to an academy within Vanguard Trust in September 2021, and officers will discuss with the Trust the current projections and future demand for Year 3 places.

PRIMARY PLANNING AREA 5		CENSUS MAY 2021 ROLLS										CONFIRMED RECEPTION NUMBERS IN SEPTEMBER 2021
SCHOOL	PAN	Year R	Y1	Y2	Y3	Y4	Y5	Y6	TOTAL	IF FULL	% vacant	
Field End Infant School	120	82	101	91					274	360	24%	81
Field End Junior School	120				89	101	97	103	390	480	19%	
Ruislip Gardens Primary School	90	35	44	48	45	36	54	48	310	630	51%	
Bourne Primary School	30	26	28	29	30	28	30	29	200	210	5%	
Deanesfield Primary School	90	86	90	91	91	87	85	85	615	630	2%	
Sacred Heart Catholic Primary School	90	90	87	90	89	90	90	83	619	630	2%	
St Swithun Wells Catholic School	30	27	30	30	30	30	29	25	201	210	4%	
Lady Bankes Infant School	90	75	85	90					250	270	7%	
Lady Bankes Junior School	90				81	86	81	72	320	360	11%	
Newnham Infant School	90	86	90	90					266	270	1%	
Newnham Junior School	90				89	89	89	88	355	360	1%	

### Process For PAN Reduction

32. The process is statutory and must follow the Admissions Code, as amended in September 2021. The Local Authority has reviewed the demand for the schools within their local context and discussed with the schools and meetings of their Full Governing Bodies will formally resolve they support the proposals.
33. Full Cabinet has to consider the proposal to reduce PAN in community schools as it affects residents' access to local schools.
34. If Cabinet approves the consultation, this will then take place from 18th October 2021 until 13th December 2021, a total of 8 weeks. Consultees will be invited to respond via a dedicated email address. The statutory requirement for consultation in this case is a minimum of 6 weeks and must take place between 1 October 2021 and 31 January 2022 for a reduction in the PAN to be published in March 2022 for applications for pupils to start in September 2023 in Reception (or Year 3 in Junior schools and Year 7 in secondary). The outcome of the consultations will be reported to Cabinet in February 2022 to take the final decision. Separately the Council will be a formal consultee of formal consultations carried out by non-community schools.

## Likely proposals from non-community schools

35. It is likely that up to four non-community schools that are admissions authorities will consult in the same timeframe on proposals to reduce PAN by 1 form entry. These have been discussed with officers and would still enable places for all local parents seeking them and reflect that they are already operating in most year groups at 1FE under their PAN, with intakes for September 2021 also 1 FE, or more, lower. The relevant Trusts and Foundation Boards would each run their consultations and then decide on proposals. They must formally consult the authority and Members would agree to support their proposal or oppose it. In all these cases, if no serious issues or objections are raised in responses to the consultations, Members are advised to agree the reductions, as they will support overall school improvement, stability and effectiveness. All the Trust have agreed to keep numbers under review and if necessary, can decide to add places on a temporary basis for a year at a time.

**e. Hillside Infants School (Foundation) from 90 to 60. Planning Area 2 - Northwood**

Intakes have been around 60 for some years and the linked Hillside Junior School has a PAN of 60. Both schools would increase to 90 if local demand significantly rises to fill that.

**f. Brookside Primary School (Rosedale Hewens Academy Trust) from 90 to 60 Planning Area 9 - Yeading**

The school has all year groups under 60 for some years, this reduction will formalise this to reflect local demand.

**g. Wood End Park Primary Academy (Park Federation Academy Trust) from 150 to 120 PPA 11 - Hayes**

This is the largest primary school in the borough and likely to remain so for some years; and though several year groups are now under 120 it is still larger than some of the secondary schools.

**h. Oak Wood Secondary School (Foundation) from 270 to 240 – Hillingdon East**

The school was rebuilt with a new PAN of 270 a few years ago and the school has grown continuously and is now amongst the largest in the LA. However, 270 is the second highest secondary PAN in the LA, and the school has not yet filled to this in any year group. It is sensible for the school to reduce operating capacity to 240, to promote stability and school improvement and avoid risk of further deficit. When it receives increased parental applications, it will then increase PAN again.

## Financial Implications

36. There are no direct financial implications arising from this report. However, it will help reduce the financial pressure on these individual schools and the risk of these schools running into deficit. Additionally, it will also reduce the risk of maintained schools requesting contributions from the council to meet redundancy costs in relation to staffing restructures. The spare physical space can be used in future if rolls rise in the relevant areas, and will be used by the schools meanwhile, or kept empty.

## EFFECT ON RESIDENTS, SERVICE USERS & COMMUNITIES

### What will be the effect of the recommendation?

37. The proposals set out in this report will help to mitigate the residual risk of Hillingdon children not securing access to a place at a local school close to where they live. Local families can access primary places nearby. The rising vacancies in a few schools reflect residents are currently not choosing to fill the school to the level of the current PAN, so the places are not needed. The schools now risk a few more pupils turning up, from further away, requiring an additional teacher which destabilises school budget and staffing and affects all the pupils. The proposals will enable better targeting of resources to priorities to help pupils, in line with the Council's vision to put our residents first.

### Consultation Carried Out or Required

38. The statutory School Admissions Code sets out that admission authorities must set ('determine') admission arrangements annually. Where changes are proposed to admission arrangements, the admission authority must first publicly consult on those arrangements. If no changes are made to admission arrangements, they must be consulted on at least once every 7 years. For admission arrangements for entry to school in September 2023, consultation must be for a minimum of 6 weeks and must take place between 1 October 2021 and 31 January 2022. The Code states that this consultation period will allow parents, other schools, religious authorities and the local community to raise any concerns about proposed admission arrangements.

39. To ensure compliance with the Code, the Local Authority will consult with:

- a) Parents of children between the ages of two and eighteen:
- b) Other persons in the relevant area who in the opinion of the admission authority have an interest in the proposed admissions:
- c) All other admission authorities within the relevant area (except that primary schools need not consult secondary schools):
- d) Any adjoining neighbouring local authorities where the admission authority is the local authority:

40. Subject to agreement from the Cabinet, the proposals will be available through the Council's established communication channels for comment. It is proposed that the consultation will last from 18 October 2021 until 13th December 2021.

## CORPORATE IMPLICATIONS

### Corporate Finance

Corporate Finance has reviewed this report and confirms that there are no direct financial implications arising from the recommended amendments to the school admissions criteria. Broader financial implications associated with the Council's strategic education function are managed through the wider Medium-Term Financial Forecast.

## Legal

### The School Admissions Code

The Schools Admissions Code 2021 ["the Code"] comes into force from 1 September 2021, having been issued under Section 84 of the School Standards and Framework Act 1998. It applies to all maintained schools in England. It is the responsibility of all admission authorities to ensure that admission arrangements are fully compliant with the Code.

The purpose of the Code, which has the force of law, is to ensure that all school places are allocated and offered in an open and fair way. In drawing up their admission arrangements, admission authorities must ensure that the practices and the criteria used to decide the allocation of school places are fair, clear and objective. The intention is that parents should be able to look at a set of arrangements and understand easily how places for that school will be allocated.

Admissions authorities must set out in their arrangements the criteria against which places will be allocated at the school where there are more applications than places and the order in which the criteria will be applied. Over subscription criteria, as it is known, must be reasonable, clear, objective, procedurally fair and comply with all relevant legislation, including human rights and equalities legislation.

Paragraph 1.9 of the Code provides that it is for admission authorities to formulate their own admission arrangements, but they must not take into account the 15 criteria which are listed in this paragraph.

The proposals for changes to the Council's admissions criteria, which the Cabinet has been invited to consider, do not fall within any of the "exempt" criteria referred to above and therefore, it is lawful for the Council to commence a consultation exercise in relation to these proposals.

### Consultation

Where changes are proposed to admission arrangements, admission authorities must first publicly consult on those arrangements. In this case, consultation must last for a minimum of 6 weeks and must take place between 1 October 2021 and 31 January 2022.

The Council is required, in accordance with paragraph 1.47 of the Code, to consult with:

1. parents of children between the ages of 2 and 18;
2. other persons in the relevant area who, in the opinion of the Council, have an interest in the proposed admissions;
3. all other admission authorities within the relevant area [except that primary schools need not consult secondary schools];
4. whichever of the governing body and the local authority who are not the admission authority;
5. any adjoining neighbouring local authorities where the admission authority is the local authority;  
and

6. in the case of schools designated with a religious character, the body or person representing the religion or religious denomination.

The Council will be required, for the duration of the consultation period, to publish a copy of its full proposed admission arrangements on its website together with details of the person within the Council to whom comments may be sent and the areas on which comments are not sought. The Council must also send, upon request, a copy of the proposed admission arrangements to any of the persons or bodies listed above, inviting comment.

It is important to note that consultation processes undertaken by public bodies have been subject to increasing judicial scrutiny. The case of *Moseley v London Borough of Haringey LBC* was considered by the highest Court in the land, the Supreme Court, in 2014. It was held that Haringey had conducted an unlawful consultation exercise. The Supreme Court unanimously approved the case of *R v Brent LBC ex parte Gunning* which sets out the key features of a lawful consultation process. The Gunning principles, as they are known, require that consultation should:

- a. be undertaken at a time when the relevant proposal[s] is still at a formative stage;
- b. give sufficient reasons for particular proposals to permit of intelligent consideration and an intelligent response;
- c. give consultees adequate time for consideration and response;
- d. ensure that the product of consultation must be conscientiously taken into account by the decision maker.

It is of the utmost importance that these principles are fully adhered to by the Council in relation to the consultation process which is the subject of the report.

### *The Human Rights Act*

This Act confers a right of access to education. However, this right does not extend to securing a place at a particular school. The Council will nevertheless need to consider parents' reasons for expressing a preference for a school when it makes admission decisions although it does not follow that this will necessarily result in the allocation of a place.

### *The Equality Act*

Paragraph 1.8 of the Code specifically provides that admission authorities must ensure that their arrangements will not disadvantage unfairly, either directly or indirectly, a child from a particular social or racial group, or a child with a disability or special educational needs.

The Council is also subject to the Public Sector Equality Duty ["PSED"] and therefore it must have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations between those with protected characteristics and those without it. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

On the basis that the PSED is a continuing duty, an Equality and Human Rights Impact Assessment will be completed if any material issues are identified as a result of the consultation.

## BACKGROUND PAPERS

[School Admissions Code 2021](#)



## **Appendix 1**

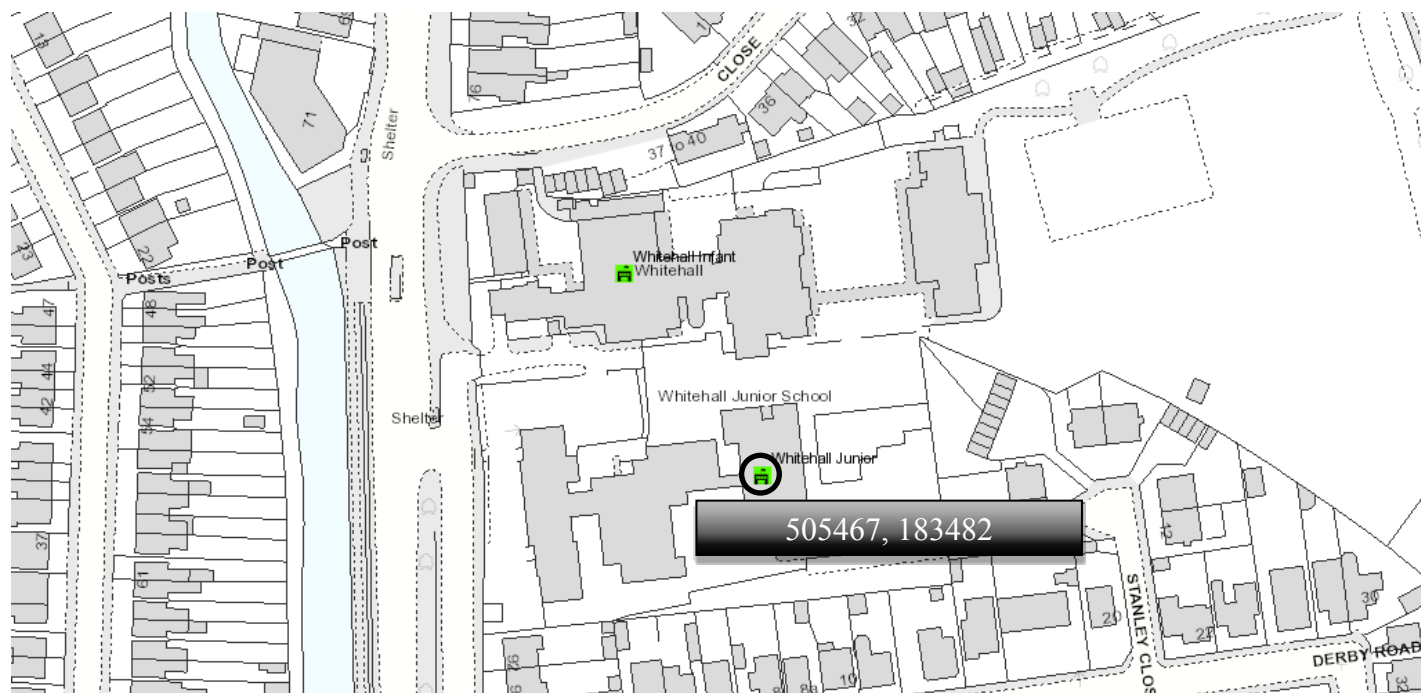
### School Measuring Points

Within Hillingdon's determined admissions arrangements under the definition of the distance criterion, we publish the following, 'Distance is measured in a straight line from the child's home address to the school, using a Geographical Information System (GIS) which is based on ordnance survey data. The measurement is from the address point for the home address to the agreed address point for the school'. This only applies when using the oversubscription criteria when, there have been more applications received than places available.

*The following maps are clear to view once this document is printed.*

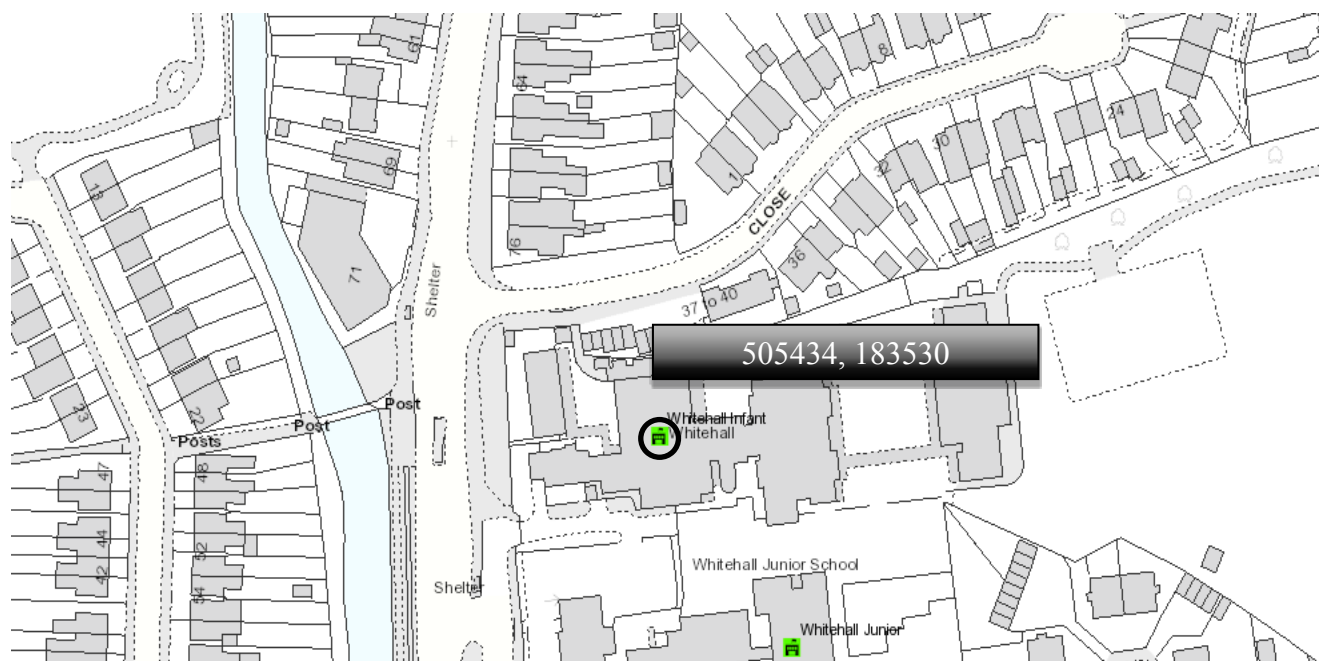
### Whitehall Infant School current coordinates

The map below shows where the current coordinates for Whitehall Infant School are set (circled below). The current measuring point for this schools is calculated from Whitehall Junior School.



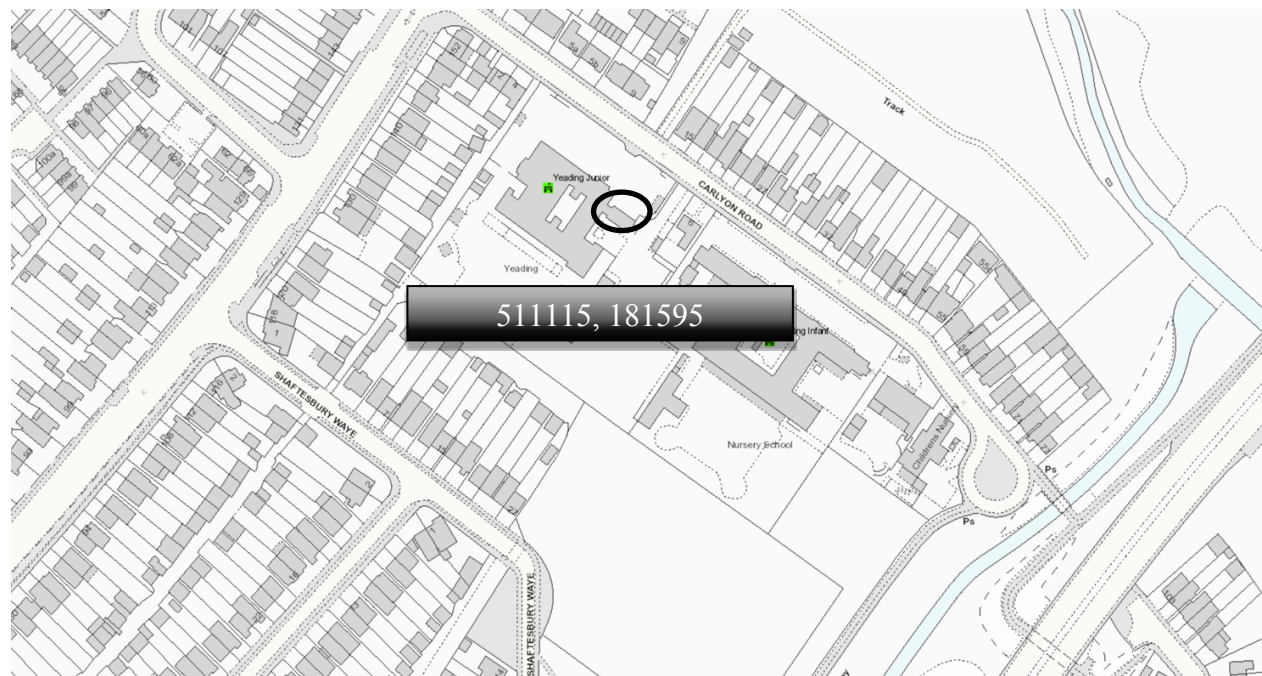
### Whitehall Infant School proposed coordinates

The map below shows where the proposed measurements are to be set. The proposed measuring point provided on the map below will be calculated from a point circled at Whitehall Infant School



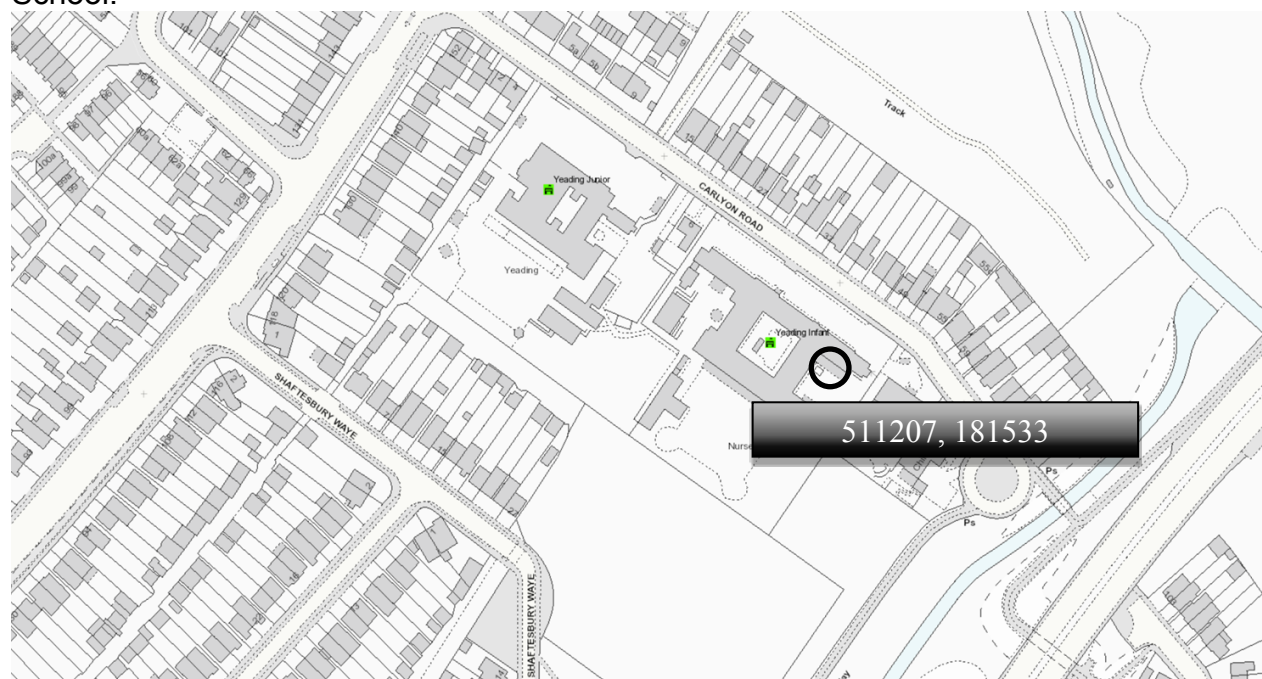
### Yeading Infant & Nursery School current coordinates

The map below shows where the current coordinates for Yeading Infant & Nursery School are set (circled below). The current measuring point for this school is calculated from Yeading Junior School.



### Yeading Infant & Nursery School proposed coordinates

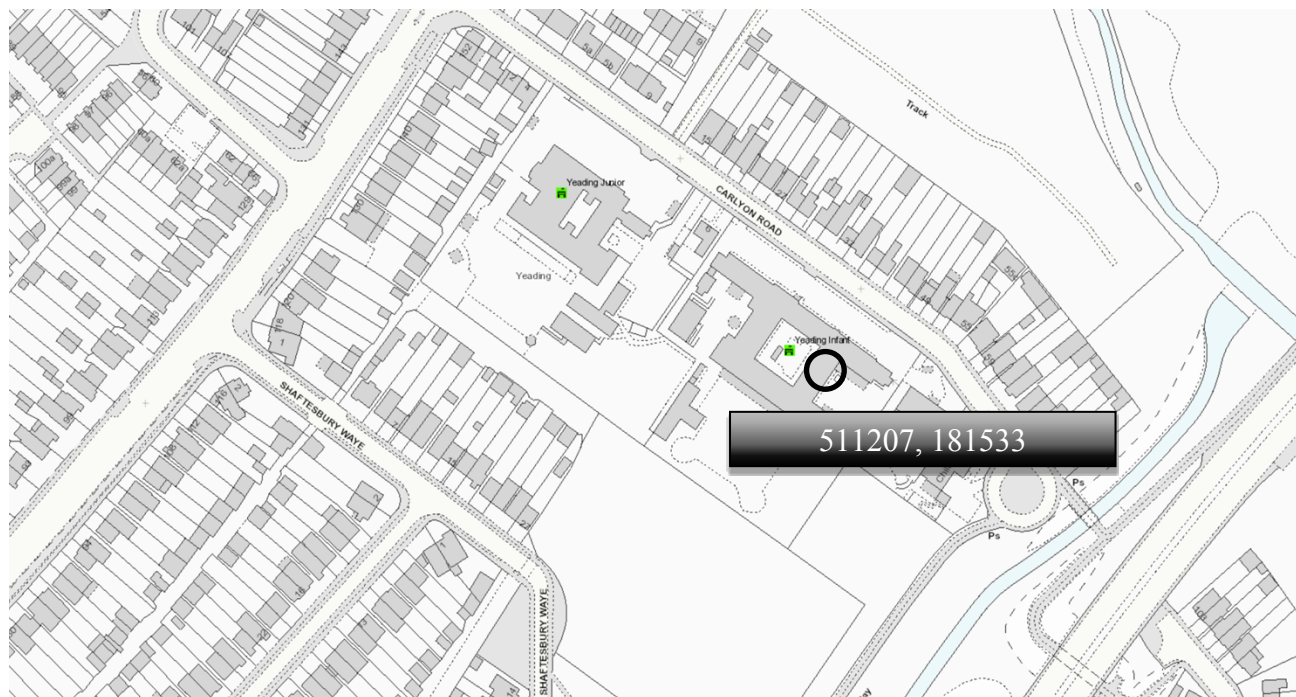
The map below shows where the proposed measurements are to be set. The proposed measuring point provided on the map below will be calculated from a point circled at Yeading Infant & Nursery School.





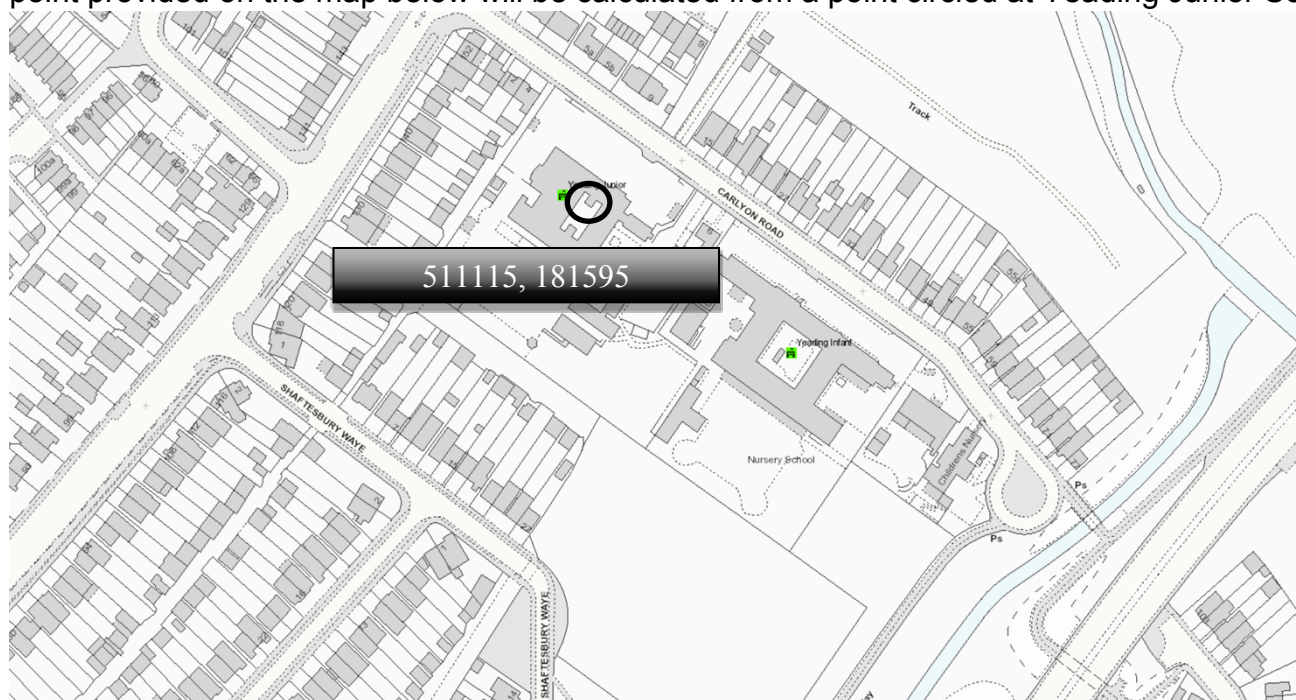
### Yeading Junior School current coordinates

The map below shows where the current coordinates for Yeading Junior School are set (circled below). The current measuring point for this school is calculated from Yeading Infant & Nursery School



### Yeading Junior School proposed coordinates

The map below shows where the proposed measurements are to be set. The proposed measuring point provided on the map below will be calculated from a point circled at Yeading Junior School.



## Appendix 2

### Existing Admissions Criteria

The following applies to all community schools except for Heathrow Primary School, Harmondsworth Primary School and Frithwood Primary School which are listed below.

Existing criteria
1. A looked after child (as defined in the Children Act 1989) or a child who was previously looked after but immediately after being looked after became subject to an adoption, child arrangements, or special guardianship order including those who appear [to the admission authority] to have been in state care outside of England and ceased to be in state care as a result of being adopted. <b>(Statutory requirement)</b>
2. Children attending the linked infant school are given priority for admission to the junior school (this applies to junior school applications only).
3. Children who suffer from a long-term medical condition or have a social reason, which makes it necessary for them to attend a particular school.
4. Children who have a member of the immediate family who suffer from a long-term medical condition or have a social reason which makes it necessary for them to attend a particular school.
5. Children who have a sibling* living within the distance priority radius.
6. Children who have a sibling* who was admitted to the full-time school or linked junior school prior to 31st August 2017
7. Children of staff where the member of staff is recruited to fill a vacant post for which there is a demonstrable skill shortage. (Does not apply if applying for Infant School and the parent is a member of staff in the Junior School).
8. Children living nearest the school within the distance priority radius.
9. Children who have a sibling* living outside of the distance priority radius.
10. Children living nearest the school not within the distance priority radius.
Priority will be given within each criterion for those living nearest the school according to distance which will be measured in a straight line from the point set by Ordnance Survey at the child's home address and the school using Hillingdon Council's computerised mapping system. The supporting evidence in Criteria 3 and 4 above should set out the particular reasons why the school in question is the most suitable and the difficulties that

would be caused if the child had to attend another school. The admission authority cannot give higher priority to children under these criteria if the required documents have not been produced. Applications must be supported by medical evidence from a GP or Hospital Consultant. Full information on the medical criteria is available in the full admissions arrangements.

\* For the purposes of criteria 5, 6 and 9, a sibling is defined as a brother or sister, half brother or sister with at least one parent in common, adopted brother or sister living in the same household who currently attends the full-time school (not the nursery) and will continue to do so on the date of admission. Linked infant and junior schools are considered to be the same school for these criteria.

The distance priority radius for each school will be set as follows.

1 form entry school = 500 metres

2 form entry school = 750 metres

3 form entry school = 1000 metres

4 form entry school = 1250 metres

5 form entry school = 1500 metres

(Currently no community schools have a full intake of 5 forms of entry, but this provision is included in the arrangements to future proof against rising demand for primary school places)

## Frithwood Primary School

Existing criteria
1. A looked after child (as defined in the Children Act 1989) or a child who was previously looked after but immediately after being looked after became subject to an adoption, child arrangements, or special guardianship order including those who appear [to the admission authority] to have been in state care outside of England and ceased to be in state care as a result of being adopted. <b>(Statutory requirement)</b>
2. 5 places will be made available to children living nearest the nodal point using the coordinates 5081120, 1912400 (junction of Ducks Hill Road and Northgate) and who live within the defined boundary area shown in the map in Appendix 3. If fewer than 5 places are offered the remaining places will be offered to applicants meeting criteria 3 or below.
3. Children who suffer from a long term medical or social condition, which makes it necessary for them to attend a particular school.
4. Children who have a member of the immediate family who suffer from a long term medical or social condition which makes it necessary for them to attend a particular school.
5. Children who have a sibling* living within the distance priority radius.
6. Children who have a sibling* who was admitted to the full-time school prior to 31st August 2017.
7. Children living nearest the school within the distance priority radius.
8. Children of staff where the member of staff is recruited to fill a vacant post for which there is a demonstrable skill shortage.
9. Children who have a sibling* living outside of the distance priority radius.
10. Children living nearest the school not within the distance priority radius.
<p>Priority will be given within each criterion for those living nearest the school according to distance which will be measured in a straight line from the point set by Ordnance Survey at the child's home address and the school using Hillingdon Council's computerised mapping system.</p> <p>The supporting evidence in Criteria 3 and 4 above should set out the particular reasons why the school in question is the most suitable and the difficulties that would be caused if the child had to attend another school. The admission authority cannot give higher priority to children under these criteria if the required documents have not been</p>

produced. Applications must be supported by medical evidence from a GP or Hospital Consultant. Full information on the medical criteria is available in the full admissions arrangements.

\* For the purposes of criteria 5, 6, and 9, a sibling is defined as a brother or sister, half brother or sister with at least one parent in common, adopted brother or sister living in the same household who currently attends the full-time school (not the nursery) and will continue to do so on the date of admission.

The nodal point used in criteria 4 will give priority to applicants living in an area where it is traditionally more difficult to secure a place at a nearby school.

The distance priority radius for each school will be set as follows.

1 form entry school = 500 metres

2 form entry school = 750 metres

3 form entry school = 1000 metres

4 form entry school = 1250 metres

5 form entry school = 1500 metres (currently no community schools have a full intake of 5 forms of entry, but this provision is included in the arrangements to future proof against rising demand for primary school places)



## Harmondsworth Primary School

Existing criteria
1. A looked after child (as defined in the Children Act 1989) or a child who was previously looked after but immediately after being looked after became subject to an adoption, child arrangements, or special guardianship order including those who appear [to the admission authority] to have been in state care outside of England and ceased to be in state care as a result of being adopted. <b>(Statutory requirement)</b>
2. Children who suffer from a long term medical or social condition, which makes it necessary for them to attend a particular school.
3. Children who have a member of the immediate family who suffer from a long term medical or social condition which makes it necessary for them to attend a particular school.
4. Children who have a sibling* living within the defined boundary area (identified below).
5. Children who have a sibling* who was admitted to the full-time school prior to 31st August 2017.
6. Children living nearest the school within the defined boundary area (identified below)
7. Children of staff where the member of staff is recruited to fill a vacant post for which there is a demonstrable skill shortage.
8. Children who have a sibling living outside of the defined boundary area (identified below)
9. Children living outside of the defined boundary area (identified below)
<p>Priority will be given within each criterion for those living nearest the school according to distance which will be measured in a straight line from the point set by Ordnance Survey at the child's home address and the school using Hillingdon Council's computerised mapping system.</p> <p>The supporting evidence in Criteria 2 and 3 above should set out the particular reasons why the school in question is the most suitable and the difficulties that would be caused if the child had to attend another school. The admission authority cannot give higher priority to children under these criteria if the required documents have not been produced. Applications must be supported by medical evidence from a GP or Hospital Consultant. Full information on the medical criteria is available in the full admissions arrangements.</p>

\* For the purposes of criteria 4, 5 and 8, a sibling is defined as a brother or sister, half brother or sister with at least one parent in common, adopted brother or sister living in the same household who currently attends the full-time school or linked junior school (not the nursery) and will continue to do so on the date of admission.

The defined boundary area for Harmondsworth Primary School includes all residential properties satisfying the 5 conditions below:

- The M4 is to the North
- The M25 is to the West
- The M4 Spur is to the East
- The Bath Road is to the South and Northern Perimeter Road are to the South
- The property does not fall within the defined boundary area for Heathrow Primary School.

## Heathrow Primary School

Existing criteria
1. A looked after child (as defined in the Children Act 1989) or a child who was previously looked after but immediately after being looked after became subject to an adoption, child arrangements, or special guardianship order including those who appear [to the admission authority] to have been in state care outside of England and ceased to be in state care as a result of being adopted. <b>(Statutory requirement)</b>
2. Children who suffer from a long term medical or social condition, which makes it necessary for them to attend a particular school.
3. Children who have a member of the immediate family who suffer from a long term medical or social condition which makes it necessary for them to attend a particular school.
4. Children who have a sibling* living within the defined boundary area (identified below).
5. Children who have a sibling* who was admitted to the full time school prior to 31st August 2017
6. Children living nearest the school within the defined boundary area (identified below)
7. Children of staff where the member of staff is recruited to fill a vacant post for which there is a demonstrable skill shortage.
8. Children who have a sibling* living outside of the defined boundary area (identified below).
9. Children living outside of the defined boundary area (identified below)
<p>Priority will be given within each criteria for those living nearest the school according to distance which will be measured in a straight line from the point set by Ordnance Survey at the child's home address and the school using Hillingdon Council's computerised mapping system.</p> <p>The supporting evidence in Criteria 2 and 3 above should set out the particular reasons why the school in question is the most suitable and the difficulties that would be caused if the child had to attend another school. The admission authority cannot give higher priority to children under these criteria if the required documents have not been produced. Applications must be supported by medical evidence from a GP or Hospital Consultant. Full information on the medical criteria is available in the full admissions arrangements.</p>

\* For the purposes of criteria 4, 5 and 8, a sibling is defined as a brother or sister, half brother or sister with at least one parent in common, adopted brother or sister living in the same household who currently attends the full-time school or linked junior school (not the nursery) and will continue to do so on the date of admission.

The defined boundary area for Heathrow Primary School includes all residential properties located on the roads listed below

<b>Ashby Way</b>	<b>Blunts Avenue</b>
<b>Bomer Close</b>	<b>Chitterfield Gate</b>
<b>Harmondsworth Lane 2 to 46 and 1 to 59</b>	<b>Hollycroft Close</b>
<b>Kenwood Close</b>	<b>Russell Gardens</b>
<b>Sipson Close</b>	<b>Sipson Lane(from Sipson Road to M4 Spur)</b>
<b>Sipson Road 1 to 10 Copsewood Court</b>	<b>Sipson Road 239 to 501 and 356 to 544</b>
<b>Sipson Way</b>	<b>Vincent Close</b>
<b>Vineries Close</b>	<b>Wykeham Close</b>

## PROCUREMENT OF TEMPORARY ACCOMMODATION PLACEMENTS UTILISING A DYNAMIC PURCHASING SYSTEM

<b>Cabinet Member(s)</b>	Cllr Eddie Lavery
<b>Cabinet Portfolio(s)</b>	Environment, Housing & Regeneration
<b>Officer Contact(s)</b>	Mark Billings – Planning, Environment, Education and Community Services
<b>Papers with report</b>	N/A

### HEADLINES

<b>Summary</b>	This report seeks Cabinet approval to establish a Dynamic Purchasing System (DPS) against which the Council will award contracts for the supply of Temporary Accommodation.
<b>Putting our Residents First</b>	This report supports the following Council objectives of: <i>Our People</i> ;  The report also supports the objectives of the Hillingdon Homelessness Prevention and Rough Sleeping Review and Strategy 2019 to 2024.
<b>Financial Cost</b>	It is anticipated that throughout the duration of the DPS the cost will be £4.2 million annually. Officers recommend that the DPS contract length should be 5 years with a 2 year extension option. The maximum total cost would be £29.4 million.
<b>Relevant Select Committee</b>	Environment, Housing and Regeneration Select Committee
<b>Relevant Ward(s)</b>	All

### RECOMMENDATIONS

**That the Cabinet:**

- 1. Approves the establishment of a Dynamic Purchasing System (DPS) and authorises officers to procure temporary accommodation placements via that system.**
- 2. In order to meet statutory housing need, authorises officers to directly award placements on a spot contract basis where suitable arrangements cannot be made from the DPS; or where crisis or emergency circumstances dictate that it is not possible to do so via the DPS.**

## **Reasons for recommendation**

Hillingdon Council has statutory duties to prevent and relieve homelessness for all eligible homeless applications and to secure accommodation for homeless households who fall into a 'priority need' category under Part 7 of the Housing Act 1996 (as amended).

In line with Hillingdon's approved Homelessness Prevention and Rough Sleeper Strategy, in many cases the Council successfully avoids homelessness for residents by resolving their housing difficulties at an early stage or securing suitable, alternative accommodation, preventing the need for temporary accommodation. This has led to a significant reduction in the number of families living in temporary accommodation compared to many other London boroughs. In some cases, the use of temporary accommodation or emergency accommodation is unavoidable and therefore effective arrangements are required to access accommodation quickly which offers value for money for residents.

By utilising the DPS to source temporary accommodation placements, the Council will be implementing an open, transparent procurement process offering best value through mini competition.

## **Alternative options considered / risk management**

The Council could decide to continue to source and manage temporary accommodation placements through the existing methods. Currently the Council has several approved suppliers who provide daily availability emails to our officers who will then email or call throughout the day to book the accommodation and check that it is still available as these emails are sent to all local authorities that the provider works with. During these conversations officers will negotiate rates and the arrangements for meeting the tenant along with planning for any specific accommodation requirements such as cots or additional beds in the property. Often officers must ring around several suppliers several times a day due to the fast-changing nature of this type of accommodation.

The DPS however, offers a more efficient and streamlined process. The DPS will be less time consuming and provide transparency and confidence that best value has been achieved. It is accepted that there may be occasions such as an emergency or crisis requirement that may require direct award.

Regarding risk, the DPS manages quality and financial risk through proportionate entry requirements of providers and through ongoing contract monitoring.

Public Contracts Regulations (2015) require that sourcing arrangements are open and transparent and are operated by electronic means. Not implementing a dynamic purchasing system could open the Council to potential challenge and non-compliance with Public Procurement Policy regulations.

## **Democratic compliance / previous authority**

Cabinet authority is required to establish any such new procurement framework, and in doing so Cabinet may also authorise the relevant officer to make specific case-by-case procurement decisions within the framework.

## Select Committee comments

None

## SUPPORTING INFORMATION

### Background

1. The Council's duties owed to homeless people are now contained in Part 7 of the *Housing Act 1996* (as amended). The *Homelessness Reduction Act 2017* (HRA) has, since 3 April 2018, placed a duty on authorities in England to:
  - Work to prevent homelessness for all eligible applicants who are threatened with homelessness, i.e. likely to become homeless within 56 days.
  - Work to relieve homelessness for all eligible applicants who become homeless.
2. Housing authorities have a duty to provide or secure the provision of advice and information about homelessness and the prevention of homelessness, free of charge. This advice and assistance must be made available to any person in the district "including people who are not eligible for further homelessness services as a result of their immigration status."
3. The Council only has an absolute duty to secure accommodation for households who are deemed to be unintentionally homeless and in priority need. If an applicant has become homeless unintentionally, the authority must assess whether they, or a member of their household, falls into a 'priority need' category.
4. If an applicant/household is in a priority need category and is homeless, the Council must secure temporary accommodation for them pending the outcome of inquiries. If a full rehousing duty is owed, suitable temporary accommodation must be provided until such time as the duty to rehouse is discharged.

### Homelessness and the need for temporary accommodation in Hillingdon

5. At the end of March 2021, there were 428 homeless households in temporary accommodation in Hillingdon, of which 169 were in emergency accommodation. In addition to the homeless households placed in temporary accommodation, there were 87 rough sleepers also housed in temporary accommodation at the end of March 2021, who were placed as part of the 'Everyone In' initiative to bring rough sleepers in off the streets as part of the response to Covid-19.
6. The overall number of households in temporary accommodation reduced slightly throughout 2020/21, but has increased slightly during 2021/22, reflecting rising levels of demand in recent months.
7. There will be additional accommodation demand pressures due to both the need for decants for the regeneration programme and increased demand as a result of a backlog of private sector eviction cases that will work their way through the courts now that

restrictions resulting from Covid-19 have now been lifted. The increased homelessness demand resulting in a requirement for the council to assist in sourcing accommodation is estimated at 20%.

### **Developing a consistent, managed and value for money approach for temporary accommodation placements**

8. A Dynamic Purchasing System (DPS) is a procedure utilised for procuring contracts of works, services and goods available from the marketplace. It has similar aspects to a framework agreement, but allows an unlimited number of providers to join the scheme at any time.
  9. The DPS will initially last 5 years (with the option to extend for a further 2 years).
  10. In order to be admitted to the DPS, providers are required to go through an application and quality assurance process to assess their knowledge, experience and expertise in delivering services. The assessment focuses on key areas such as quality, safeguarding, staffing and management. Financial evaluation will form part of the entry process.
  11. Officers will be undertaking market engagement activity to ensure that our key providers and as many local providers as possible are signed up to be part of the DPS. Providers need to recognise that registering and agreeing to be part of the arrangement is an important and positive step in building their relationship with the Council.
  12. The DPS will assist in achieving:
    - A bank of quality assured providers (by service category)
    - A clear choice of approved providers
    - Best 'market value' in terms of cost and quality of the service
    - Improved business processes for both the Council and providers
- 13. DPS Lots:**
- Lot 1 - Spot purchase B&B rooms -Bed and Breakfast  
Rooms of various sizes available in hotels and HMOs with cooking facilities. These rooms are used on a temporary basis, the length of use for families is limited to 6 weeks and paid for on a nightly basis.
- Lot 2 – Spot Purchase of Self-Contained Accommodation (Annexes)  
These are pre-dominantly family sized properties used on a spot purchase (on demand) basis, used as short-term temporary accommodation. They are fully furnished, and tenure is based on a license.
- Lot 3 - Block Bookings of B&B rooms and Annexes  
Rooms and self-contained accommodation of various sizes, from single to family size, most of which have some self-contained facilities, either bathing or cooking or both. The period of the block booking can range from 1 to 5 years depending on price offered and standard of the units. Block bookings are all subject to negotiation.



Lot 4 – Out of Hours Accommodation

Rooms of various sizes available in hotels and HMOs that are available to be accessed 24 hours a day.

### **13. Entry Process**

- 13.1. Providers wishing to join the DPS are invited to access the Tender documents online and submit a completed response to the Invitation to Tender (ITT) via Capital ESourcing at [https:// www.capitalesourcing.com](https://www.capitalesourcing.com)
- 13.2. Documents received by any other means will be rejected.
- 13.3. The Tender documents potential providers are required to complete and submit include the Form of Tender, Pre-Qualification Questionnaire (PQQ) online. The potential Providers will be required to submit policy and procedure information and financial accounts. In some cases, there will be a physical site visit from the Council before admission to the DPS.
- 13.4. The Tenders will be evaluated.
- 13.5. There will be a spot contract issued to successful providers for admission to the DPS.

### **14. Call-Off Process for Providers admitted to the DPS**

- 14.1. Providers will issue daily availability notifications to Hillingdon who will use this to make placements on a spot contract basis.
- 14.2. Council Officers will notify all Providers who have been admitted to the DPS for the relevant Lot of the opportunity.
- 14.3. The notification will detail the type of accommodation required to invite providers to meet demand.
- 14.4. The Provider who can meet the demand of the accommodation type and suitability criteria, at the lowest price will “win” the placement.
- 14.5. If the placement cannot be made from the DPS the officers will award the placements off the DPS, however, the intention is that this is infrequent.
- 14.6. All requests for requests for placements are signed off by a senior officer and subsequently approved by the relevant budget manager through existing internal management systems. All placements are also reviewed as part of the services monthly budget monitoring.

### **Financial Implications**

There are no additional costs associated with the use of the DPS system. Any changes required to current Temporary Accommodation booking processes are expected to be covered within existing resources. The increase in demand for Temporary Accommodation units due to the ‘Everybody in Initiative’ has led to an increase in unit costs when compared to 2019-20 rates. Rough Sleeper placements have been funded via specific grant with the increase in cost on general homelessness placements funded by Covid-19 contingency. The DPS system will

provide a tool to purchase from pre-approved providers at the lowest rate offered which will enable the service to better manage expenditure within budgeted levels.

The current level of business for the market that will be accessed via this DPS is approximately £4.2M per annum including expenditure on providing accommodation for Rough Sleepers. Providers are financially evaluated before being admitted to the DPS and will be monitored for quality and financial stability.

## RESIDENT BENEFIT & CONSULTATION

### **The benefit or impact upon Hillingdon residents, service users and communities?**

Utilisation of a DPS will ensure the Council secures best value for temporary accommodation placements. The DPS offers an open, transparent system which provides equity and compliance as well as a systematic methodology for sourcing placements, with evaluation clearly based on price & quality.

### **Consultation carried out or required**

Not required.

## CORPORATE CONSIDERATIONS

### **Corporate Finance**

Corporate Finance has reviewed the report and concurs with the financial implications contained within, noting that the use of the Dynamic Purchasing System will enable temporary accommodation to be procured within existing budgets.

Financial vetting that is acceptable in accordance with the Council's Supplier Risk Protocol will be undertaken before Providers are admitted to the Dynamic Purchasing System.

### **Legal**

The Borough Solicitor confirms that the use of a Dynamic Purchasing System (DPS) is authorised and must comply with the Council's Procurement and Contract Standing Orders as set out in the report.

The Borough Solicitor also confirms that there are no legal implications arising from this report and that the approval of the recommendation will facilitate the Council in meeting its statutory obligations pursuant to Part 7 of the *Housing Act 1996* (as amended) and the Homelessness Reduction Act 2017.

## BACKGROUND PAPERS

NIL.

## APPROPRIATION OF LAND AT FORMER YIEWSLEY SWIMMING POOL AND FALLING LANE YIEWSLEY

<b>Cabinet Member(s)</b>	Cllr Jonathan Bianco
<b>Cabinet Portfolio(s)</b>	Cabinet Member for Property & Infrastructure
<b>Officer Contact(s)</b>	Michele Wilcox, Infrastructure, Transport & Building Services
<b>Papers with report</b>	Site Plans

### HEADLINES

<b>Summary</b>	<p>This report seeks Cabinet authority to begin the procedure for the appropriation of land from public open space to planning purposes pursuant to section 122 of the Local Government Act 1972 as amended by the Local Government Planning and Land Act 1980 section 118 schedule 23.</p> <p>The report seeks to delegate authority to the Leader of the Council and Cabinet Member for Property &amp; Infrastructure, in consultation with the Corporate Director of Infrastructure, Building Services and Transport to consider any consultation responses to the proposed appropriation; decide whether the land should be appropriated for planning purposes and to make all necessary decisions to give effect to the recommendations and any other decisions which are required in relation to the land.</p>
<b>Putting our Residents First</b>	This report supports the following Council objectives of: <i>Our Built Environment and Strong financial management.</i>
<b>Financial Cost</b>	Advertising Costs of £456.
<b>Relevant Select Committee</b>	Corporate, Finance and Property
<b>Relevant Ward(s)</b>	Yiewsley

## RECOMMENDATIONS

That the Cabinet:

1. **Authorises officers to give public notice of the Council's intention to appropriate the land from public open space to planning purposes pursuant to section 122 of the Local Government Act 1972 as amended by the Local Government Planning and Land Act 1980 section 118 schedule 23 on the land set out in the plans.**
2. **Delegates authority to the Leader of the Council and Cabinet Member for Property and Infrastructure, in consultation with the Corporate Director of Infrastructure, Transport and Building Services, to consider any objections to the proposed appropriation; decide whether the land should be appropriated for planning purposes and to make all necessary decisions to give effect to the above recommendation and any other decisions which are required in relation to the land.**

### Reasons for recommendation

A full report on title has shown the land known as Yiewsley Recreation Ground, Falling Lane and the former Yiewsley Swimming pool at Otterfield Road is affected by the restrictive covenants imposed under a conveyance dated 21 August 1922, 21 March 1934 and 21 December 1926. As the land to be sold is included within the land affected by this agreement, the Council will have to obtain a release of the site from these agreements. Legal Services recommend that this is done by appropriating the site and this is done by advertising the proposed appropriation from public open space to planning purposes pursuant to section 122 of the Local Government Act 1972 as amended by the Local Government Planning and Land Act 1980 section 118 schedule 23.

### Alternative options considered / risk management

There is no alternative but to appropriate the land if the site is to be developed and sold.

### Democratic compliance / previous authority

Cabinet on 18th May 2017 authorised the development of the sites for residential development.

### Select Committee comments

None at this stage.

## SUPPORTING INFORMATION

1. Cabinet on the 17th of May 2017 authorised the development of the sites for residential development and a new library. There are two sites as shown on the site plans. The first is the former Yiewsley swimming pool site (known as the Otterfield Road site) and the second is the land at Falling Lane. The swimming pool had previously been closed in 2010 and demolished in 2011. Both sites are surplus to requirements, and it is proposed that new library with residential flats will be built at the Otterfield Road site and residential flats at the Falling Lane site.
2. The report on title established that the site is registered in a freehold title owned by the Council, freehold title number AGL 201173. The title contains a covenant that the land will be held for the purposes of public walks and pleasure grounds, and this affects both sites.
3. As it is proposed that the Otterfield Road site will be sold to Hillingdon First Ltd for development and that the Falling Lane site is developed for residential, the Council will have to obtain a release of the restrictive covenants that affect these sites. Legal Services recommend that this is done by appropriating both sites and this is done by advertising the proposed appropriation from public open space to planning purposes pursuant to section 122 of the Local Government Act 1972 as amended by the Local Government Planning and Land Act 1980 section 118 schedule 23.
4. The Council will need to advertise its intention to appropriate the land pursuant to Section 122 of the 1972 Act in a local newspaper for two consecutive weeks and take any consultation responses into account before formally deciding to appropriate the land.
5. Site plans are attached showing the relevant land in question.

### Financial Implications

There are no direct financial implications arising from the recommended appropriation of the land, although this will facilitate the ultimate disposal of the site. The costs from the required advertisement are estimated at £456 this will be managed from within existing approved resources. Disposal of the site is expected to secure a substantial Capital Receipt and contribute towards the funding of the Council's 2021/2022 Capital Programme.

## RESIDENT BENEFIT & CONSULTATION

### The benefit or impact upon Hillingdon residents, service users and communities?

The appropriation of this land will result in the land being held for planning purposes. This will facilitate the development and sale of the land which will then enable the proposed residential development schemes and a new library to be brought forward.

## Consultation carried out or required

The Council will need to advertise its intention to appropriate the land in a local newspaper for two consecutive weeks and take any consultation responses into account before formally deciding to appropriate the land, as part of a statutory process of consultation.

In addition, the Council received an petition in 2018 objecting to the development and seeking the retention of the restrictive covenants which are relevant to the land appropriation. It was agreed at that time that the lead petitioner would be advised when the consultation process would commenced so that the petition's views could be considered as part of the statutory consultation process, as opposed to a Cabinet Member petition hearing, in accordance with the Council's Petition Scheme. Officers will contact the lead petitioner to inform them when the consultation process begins.

## CORPORATE CONSIDERATIONS

### Corporate Finance

Corporate Finance has reviewed this report and financial implications above, noting that the minor advertising costs will be funded from existing resources. It is anticipated that agreeing these recommendations will lead to the disposal of the site, with the expected proceeds contributing towards the Council's forecast 2021/22 Capital Receipts target.

### Legal

If the Council wishes to appropriate land from public open space to planning, it will need to be satisfied that the provisions of Section 123 of the Local Government Act 1972 are met and in particular that the land is no longer required for the purposes for which it was held immediately before appropriation.

The Council will also need to be satisfied that the land should be appropriated such that it becomes held for planning purposes by applying the tests set out in Section 226(1) and (1A) of the Town and Country Planning Act 1990.

Case law has established that in determining whether land is required for a particular purpose, it is legitimate to weigh up the relative importance of different needs and to exercise judgment in the public interest. In this case, the area of land in question is not needed to facilitate the open space purposes. However, the decision maker will need to be satisfied that there is in fact no need for the land to be used as public open space and that in weighing up competing needs, the balance falls in favour of appropriation and a declaration that the land is surplus to requirements.

Pursuant to Section 122 (2A) of the 1972 Act the Council will need to advertise its intention to appropriate the land in a local newspaper for two consecutive weeks and take any consultation responses into account before formally deciding to appropriate the land.

## Infrastructure / Asset Management

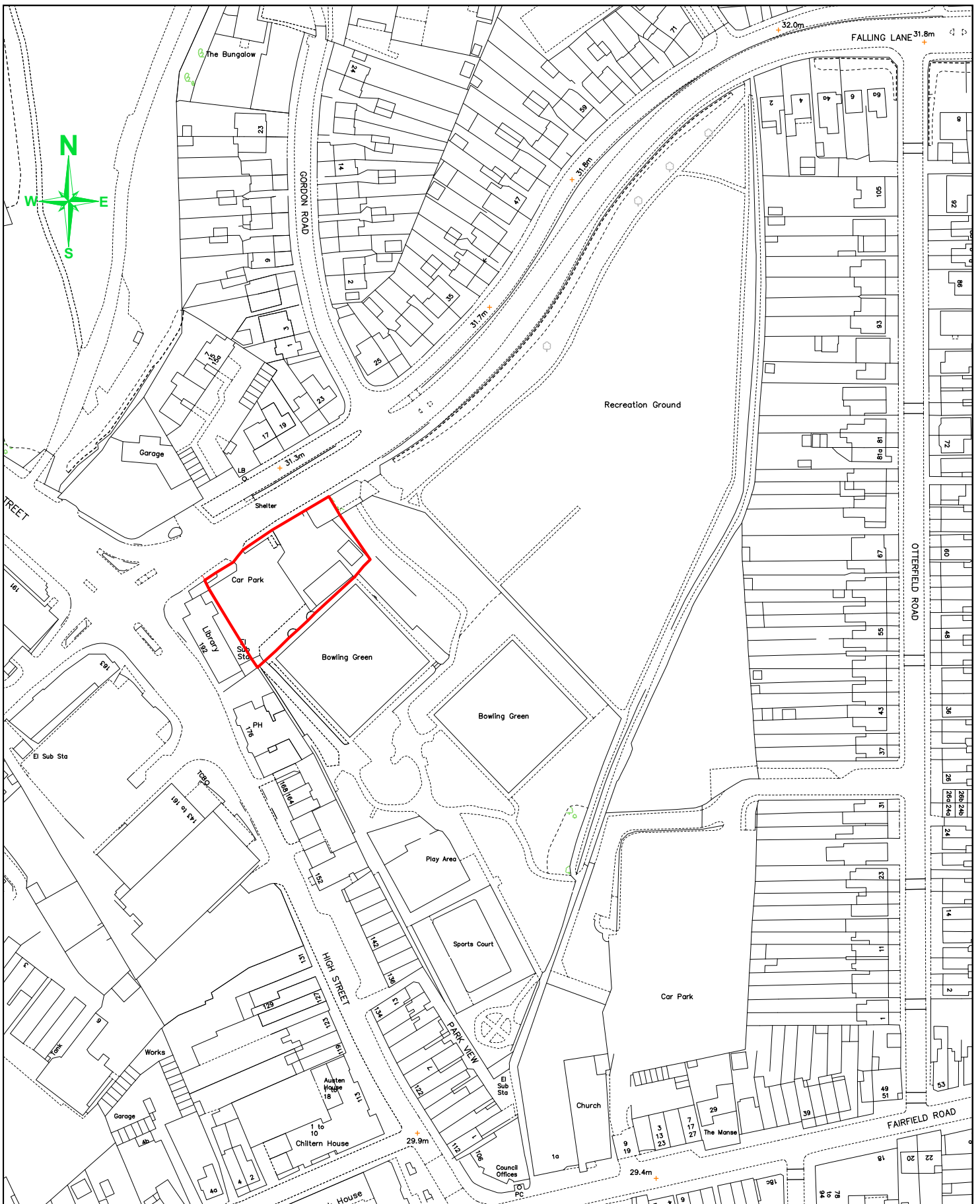
This report has been authored by Property and Estates and Infrastructure / Asset Management comments are included within the report.

### BACKGROUND PAPERS


NIL.

This page is intentionally left blank

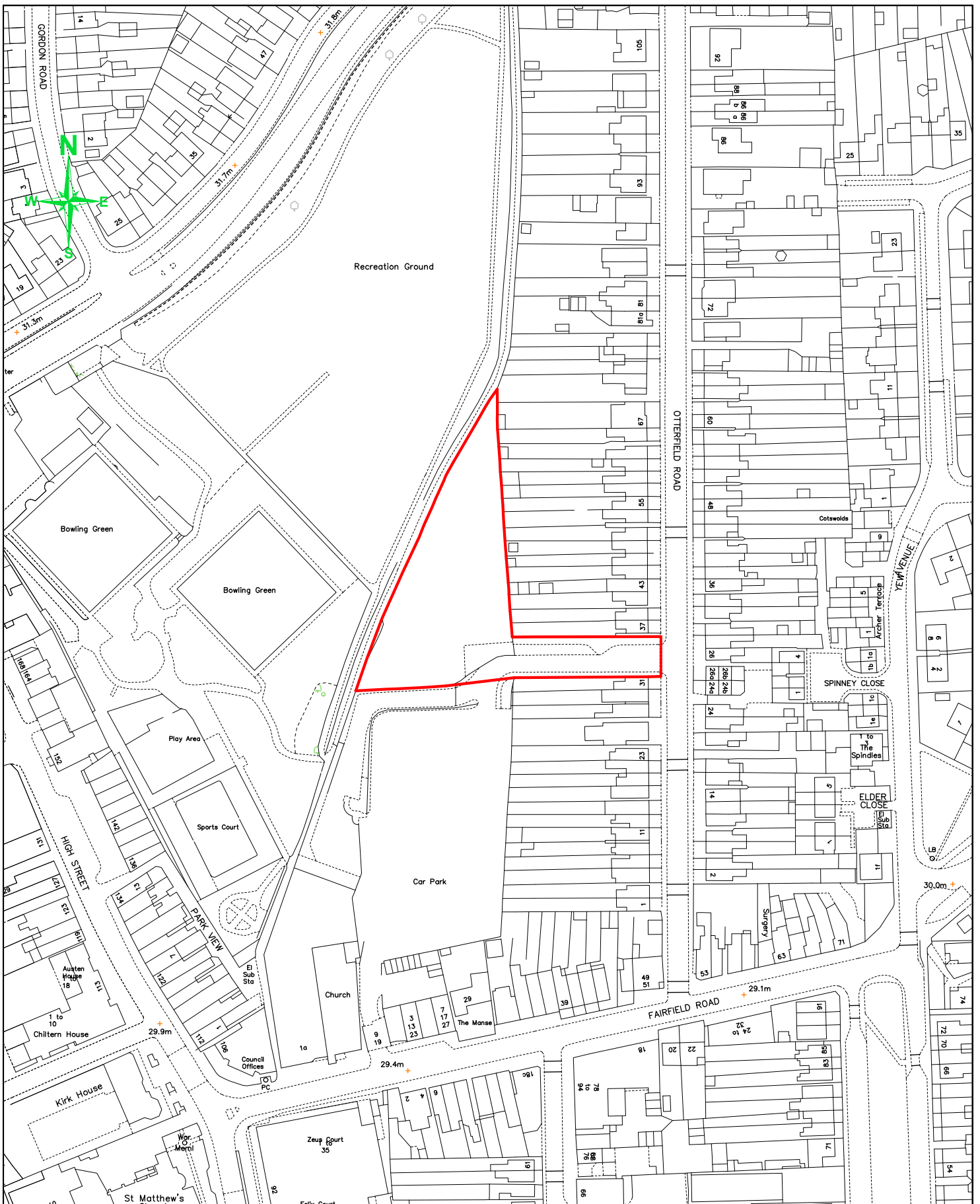





This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office (C) Crown copyright. All rights reserved. London Borough of Hillingdon 100019283 2004

	<b>PROPERTY SERVICES</b> CIVIC CENTRE, HIGH STREET UXBRIDGE, MIDDLESEX, UB8 1UW	<b>TITLE</b>	<b>DRG No</b>
		Land at Falling Lane West Drayton Page 179	YIE 336
		<b>SCALE</b>	1:1250 @ A3
		<b>DATE</b>	06/08/2021

This page is intentionally left blank



This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office (C) Crown copyright. All rights reserved. London Borough of Hillingdon 100019283 2004

 <p><b>PROPERTY SERVICES</b> CIVIC CENTRE, HIGH STREET UXBRIDGE, MIDDLESEX, UB8 1UW</p>	<b>TITLE</b>	<b>DRG No</b>	
	Land at Otterfield Road West Drayton Page 181	YIE 336	
		<b>SCALE</b>	1:1250 @ A3
		<b>DATE</b>	06/08/2021

This page is intentionally left blank

## TRANSPORT FOR LONDON, LOCAL IMPLEMENTATION PLAN, 2022/23 DELIVERY PROGRAMME

<b>Cabinet Member(s)</b>	Cllr John Riley
<b>Cabinet Portfolio(s)</b>	Cabinet Member for Public Safety and Transport
<b>Officer Contact(s)</b>	Alan Tilly, Infrastructure, Transport & Building Services
<b>Papers with report</b>	None

### HEADLINES

<b>Summary</b>	The purpose of this report is to brief Cabinet on the current situation regarding the Transport for London, Local Implementation Plan funding and recommend that Cabinet delegate authority to the Cabinet Member for Public Safety and Transport to submit the Council's Local Implementation Plan 2022/23 Delivery Programme bid and further bids to support the new three Delivery Plan required by Transport for London.
<b>Putting our Residents First</b>	This report supports the following Council objectives of: <i>Our People; Our Natural Environment; Our Built Environment; Our Heritage and Civic Pride; Strong financial management; Hillingdon Local Plan: Part 2 Development Management Policies.</i>
<b>Financial Cost</b>	There are no direct financial costs to the Council other than the officer time taken to prepare the bid.
<b>Relevant Select Committee</b>	Public Safety and Transport
<b>Relevant Ward(s)</b>	Boroughwide

### RECOMMENDATION

**That the Cabinet delegate authority to the Cabinet Member for Public Safety and Transport to submit the Council's Local Implementation Plan, 2022/23 Delivery Programme bid to Transport for London no later than week commencing 1<sup>st</sup> November 2021 and further bids to support the new three-year Delivery Plan as required by Transport for London.**

## Reasons for recommendation

Transport for London require the Council to prepare and submit a new three-year Delivery Plan for their current Local Implementation Plans. This is initially a detailed Delivery Plan for financial year 2022/23, with further plans to follow. It is necessary to delegate the authority to do this given the short amount of time the Council was given by Transport for London to prepare this initial Delivery Plan.

## Alternative options considered / risk management

An alternative option would be for full Cabinet to authorise the Delivery Plan submission, however the deadline of submitting this bid would be missed which is very likely to have a negative impact on the award of Local Implementation Plan funding.

## Democratic compliance / previous authority

To agree such external funding bids requires Cabinet authority. Cabinet may also delegate such matters to the relevant Cabinet Member.

## Select Committee comments

None at this stage.

## SUPPORTING INFORMATION

1. The Greater London Authority Act 1999 requires each London borough to prepare Local Implementation Plans (LIP) containing proposals for how they will implement the Mayor of London's Transport Strategy. The Council's present LIP, which covered a three-year plan from 2019/20 to 2021/22, was approved by Cabinet on 27<sup>th</sup> September 2018. Boroughs are now required by Transport for London (TfL) to prepare a second three-year plan for the Council's LIP covering the period 2022/23 to 2024/25. However, because of the collateral financial impacts of the coronavirus pandemic, and the uncertainties arising, unlike previous three-year plans this plan will be developed in two stages; a detailed plan for 2022/23 and following this, plans for the second and third year of the LIP up to 2024/25. These uncertainties stem from the pandemic's impact upon TfL budgets, in particular a collapse in TfL's income generated from bus and underground fares, falling as a response to lockdowns and the trend towards an increase in the number of people working from home.

2. TfL have published guidance on developing the new three-year Delivery Plans; this Guidance will be used to help shape the Council's Delivery Plan programme as '*failure to comply with this guidance is likely to have an impact on the award of funding in due course*'.

3. The Guidance requires Delivery Plan programmes to derive from the approved LIP. They should plan for the delivery of the Mayor's Transport Strategy priorities for Healthy Streets, as this is considered a keyway of addressing the challenges London faces in the recovery from the pandemic. The guidance also requires that Delivery Plan programmes are underpinned by a strong evidence base, to this end TfL have provided the Council with datasets and maps that highlight priority corridors for a range of modes and themes. These include road safety, buses,

walking and cycling. In tandem to these data sets and maps, the Council may also use locally held data, as well as taking into account stakeholder views to support its programme. To ensure that the Council's Delivery Plan programme aligns with the guidance the schemes to be included in the programme will be listed under the headings of cycling, walking, bus priority and road safety.

4. TfL highlight that there are uncertainties about future funding allocations as they continue discussions with the Department for Transport; in view of this boroughs across London have been requested to plan based on '*their 2019/20 allocations*'; in 2019/20 the LB Hillingdon allocation was £2,373k.

5. Some refinements to the three-year programme approved in September 2018 will be necessary as TfL will now only fund a limited number of studies each year. Similarly, the amount of funding that may be allocated to non-infrastructure behaviour change initiatives is now capped, taken together studies and activation measures must now not be greater than 20 per cent of the borough's total allocation. This shift in emphasis towards infrastructure will have an impact on the 2022/23 programme and the Cabinet Member for Public Safety and Transport will be consulted as the new programme is produced.

6. As mentioned above the Delivery Plan programme 2022/23 must be submitted to TfL during the week commencing 1<sup>st</sup> November 2021. In early March 2022 TfL will then notify the amount of funding it has been allocated. By summer 2022 the Council will be required to submit stage two of the three-year 2022/23 to 2024/25 plans, and with that in mind further reports from officers seeking the requisite approvals will be submitted as appropriate but this will inevitably only be possible once the appropriate guidance from TfL has been forthcoming.

## Financial Implications

7. This report is requesting permission for the preparation and the submission of a new three-year Delivery Plan for the Council's current Local Implementation Plans to TfL. The initial Delivery Plan being submitted is for transport funding for 2022/23, with further plans to be submitted for 2023/24 and 2025/26 in summer 2022.

8. The guidance published by TfL will be used to help shape the Council's Delivery Plan programme as '*failure to comply with this guidance is likely to have an impact on the award of funding in due course*'. The guidance requires the Delivery Plan programmes to derive from the approved LIP (approved September 2018), however, some refinements will be necessary as TfL have stipulated that they will now only fund a limited number of studies each year. Similarly, the amount of funding that may be allocated to non-infrastructure behaviour change initiatives is now capped, taken together studies and activation measures must now not be greater than 20 per cent of the borough's total allocation.

9. The Delivery Plan should contain the delivery of the Mayor's Transport Strategy priorities for Healthy Streets, as this is considered a keyway of addressing the challenges London faces in the recovery from the pandemic, the themes will be around cycling, walking, bus priority and road safety. The guidance also requires that the Delivery Plan programmes are underpinned by a strong evidence base and costed.

10. Transport for London's financial position has been severely impacted by the decline in public transport use due to the Covid-19 pandemic, they are in constant discussions with the Department for Transport in regards to funding. With, the uncertainty of future funding TfL have requested the Delivery Plans to be based on the 2019/20 allocations, for which Hillingdon's was £2,373k.

11. The approved capital programme submitted to Cabinet in February 2021 assumes baseline TfL LIP grant funding of £2,373k for 2022/23. The budget will be refreshed once TfL confirm the final funding position for next year following the submission.

## RESIDENT BENEFIT & CONSULTATION

### The benefit or impact upon Hillingdon residents, service users and communities?

By submitting the Delivery Plan programme 2022/23 to TfL the Council can hope to receive funding for investment in a range of transport schemes that will make improve mobility and accessibility, air quality, personal health, reduce road danger and ease the flow of traffic. Should TfL not honour the usual funding commitments, there remains a risk that the Council's ability to deliver on residents' expectations for transport related measures could be severely hampered; whilst it is not anticipated that there will be a complete collapse of this external funding, it would be prudent to consider and plan for such an event.

### Consultation carried out or required

No consultation has been carried.

## CORPORATE CONSIDERATIONS

### Corporate Finance

Corporate Finance notes that the new three-year TfL LIP delivery plan will be developed in stages, with officers to initially prepare a detailed bid for 2022/23 funding for submission in November 2022. The funding bid will be based on the pre-pandemic funding level of £2,373k, however there is significant uncertainty on the level of funding to be awarded in 2022/23, due to the ongoing impact on TfL fares income from the pandemic.

### Legal

The Greater London Authority Act 1999 requires that the Mayor shall prepare and publish a 'transport strategy' containing policies for the promotion and encouragement of safe, integrated, efficient and economic transport facilities and services to, from and within Greater London. In exercising any function, a London borough council is to have regard to the strategy. Each London borough council must prepare a plan known as a Local Implementation Plan containing its proposals for the implementation of the strategy in its area. The monitoring and implementation of the strategy is carried out by Transport for London for the Mayor under the provisions of the 1999 Act.



The Borough Solicitor also confirms that there are no legal impediments to Cabinet delegating the approval of Hillingdon's Local Implementation Plan to the Cabinet Member for Public Safety and Transport.

### **Infrastructure / Asset Management**

None at this stage.

## **BACKGROUND PAPERS**

NIL

This page is intentionally left blank

## HILLINGDON SAFEGUARDING PARTNERSHIP REPORT 2020-2021

<b>Cabinet Member(s)</b>	Cllr Jane Palmer
<b>Cabinet Portfolio(s)</b>	Cabinet Member for Health and Social Care
<b>Officer Contact(s)</b>	Alex Coman – Social Care & Health
<b>Papers with report</b>	Hillingdon Safeguarding Partnership Annual Report 2020-2021 appendix

### HEADLINES

<b>Summary</b>	<p>The Safeguarding Annual Report summarises the work undertaken by Hillingdon Safeguarding Partnership to support and safeguard Hillingdon's residents: adults with support and care needs and vulnerable children and their families.</p> <p>The report to Cabinet provides reassurance that the actions taken across the local partnership to prevent abuse, neglect and self-neglect have been effective in continuing to keep resident safe during a challenging year in which all partners and residents have had to respond to the COVID 19 pandemic and its impact.</p>
<b>Putting our Residents First</b>	This report supports the following Council objectives of: <i>Our People</i> .
<b>Financial Cost</b>	There are no direct financial implications arising from this report.
<b>Relevant Select Committee</b>	Family, Health and Wellbeing Select Committee
<b>Relevant Ward(s)</b>	All

### RECOMMENDATION

**That the Cabinet notes the Hillingdon Safeguarding Partnership Annual Report 2020-2021**

#### Reasons for recommendation

To inform the cabinet of the way in which safeguarding partnership performed the year before and which are the safeguarding priorities for the year ahead.

#### Alternative options considered / risk management

None.

## Select Committee comments

See Appendix 1 - Minutes of the session of the Families, Health and Wellbeing Select Committee.

## SUPPORTING INFORMATION

The Hillingdon Safeguarding Partnership Annual Report 2020-2021 notes the following:

1. Residents have remained safe during this period and a mature and effective safeguarding partnership has facilitated a continuation of effective joint working. This allowed the focus to be kept on the priorities identified at the beginning the year and at the same time, to respond swiftly and proportionately to the new needs and pressures created by the pandemic.
2. The joint approach to safeguarding children and adults has been further embedded during this year. The effective working together across all ages and all agencies has been evident in the fact that majority of 'core business' continued to be progressed throughout the lockdown periods, in the context of key members of the partnership being redeployed to meet the need in frontline services.
3. All agencies have seen increased levels of mental health impact of the pandemic, Domestic Abuse and impact of isolation. It is credit to this partnership, its maturity and professionalism that it has come together to respond to these challenges and continued to keep residents safe.
4. This report evidences that the learning and development work has not stopped during the pandemic and it shows that positive lessons have been learned from during this time and new methods of delivery will be carried forward and embedded in practice. For instance, the use of technology and the "hybrid" delivery where it is safe and appropriate to do so has proved to be effective and efficient and all partners are committed to maintaining this going forward.
5. In line with the legislative changes of 2018, CCG, Police and Local Authority remained partners with equal responsibility for safeguarding vulnerable children and adults and the arrangements are overseen by the Executive Leadership Group who, this year, have commissioned an independent scrutiny of the safeguarding arrangements in place for children and adults.
6. The scrutiny has found that: *"There is strong leadership from the ELG and a clear sense of joint and equal responsibility from the three safeguarding partners. The partnership is one that is built on high support, high challenge and where difficult conversations are encouraged."* and *"There is excellent engagement from leaders across the partnership who set a culture which drives improvement activity. There is a clear structure and good links between the children's and adult's partnership arrangements"*
7. The scrutineer concluded: *"I have found a strong partnership that is open to scrutiny and challenge and one that strives to continually learn and improve practice"*

## Financial Implications

This report details the work being undertaken by the Hillingdon Safeguarding Partnership and has no direct financial implications. The costs of the Safeguarding function delivering the work are contained within existing resources.

## RESIDENT BENEFIT & CONSULTATION

### The benefit or impact upon Hillingdon residents, service users and communities?

The safeguarding partnership in Hillingdon continue to respond effectively and efficiently to the needs of adults with support and care needs and vulnerable children and their families therefore ensuring that various agencies are providing effective services and support to vulnerable residents.

### Consultation carried out or required

N/A

## CORPORATE CONSIDERATIONS

### Corporate Finance

Corporate Finance has reviewed this report and concurs that that there are no direct financial implications contained in the recommendations.

### Legal

The Borough Solicitor confirms that there are no specific legal implications arising from this report.

### Comments from other relevant service areas

Comments and updates from various agencies with a role in safeguarding residents are included in the appended report

## BACKGROUND PAPERS

The Care and Support Statutory Guidance, Department of Health and Social Care, October 2018 <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>

The Care Act 2014 - <http://www.legislation.gov.uk/ukpga/2014/23/section/43/enacted>

Working together to safeguard children, Department of Education, 2018  
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

The Children and Social Work Act 2017  
<https://www.legislation.gov.uk/ukpga/2017/16/contents/enacted>

## Appendix 1

### Minutes of the session of the Families, Health and Wellbeing Select Committee – 27 July 2021

The Chair of the Children Safeguarding Partnership Board and the Director of Service Delivery – Adult Social Work introduced the report on the Hillingdon Safeguarding Partnership Annual Report 2020 – 21. An outline was provided on the work and activities undertaken by the Hillingdon Safeguarding Partnership (HSP) to support and safeguard adults with support and care needs and vulnerable children and their families.

The Committee was informed that effective safeguarding arrangements had ensured that residents remained safe during the pandemic. All the HSP partners had worked collaboratively to ensure that the changing needs of residents had been met. All agencies had seen increased levels of mental health issues, domestic abuse and the impacts of isolation. The Executive Leadership Group commissioned an independent scrutiny of the safeguarding arrangements in place for adults and children. The scrutiny found that partnership was strong, had strong leadership and continued to promote good practice enabling learning and progressing the safeguarding priorities.

Although the report was commendable and the positive actions being taken were clear, the Committee discussed the impacts of targets being met and whether this had improved the lives of residents that needed safeguarding. It was explained that work had been done around ensuring good practices, ensuring appropriate and relevant training was available and focussing on partnership work. The Committee was provided with an example of the 'neglect' priority where multi agencies case audits had been undertaken and this led to commissioning of training and practice developments across the partnership. Members requested that case examples and information be included in future reporting to enable proper scrutiny.

In response to a question on how the pandemic had impacted the number of services users, schools and parenting, it was highlighted that a new task and finish subgroup was being established by the HSP to specifically address education related concerns and how support could be provided to parents, children and schools..

Members discussed the HSP's role in overseeing children that had been excluded from school. It was noted that children at home would have other professionals working with them and home visits would take place.

It was confirmed that the HSP had information in relation to areas of deprivation in the Borough and this was taken into account in various activities like for instance the implementation of stronger families.

It was noted that nationally there had been an increase in mental health issues for younger people during the pandemic. There had been changes in demand across the country and Hillingdon had experienced similar issues. Unaccompanied asylum seeking children were a big factor in Hillingdon and a sub group, chaired by UK Border Agency continued to meet during the year to address issues around exploitation and trafficking. The subgroup reviewed initiatives in place and how well different agencies worked with trafficked children. A guide is being created for airlines to raise awareness on how to identify potentially trafficked children and how to escalate these concerns.

It was reported that the whole sector had seen an increase in the number of referrals in relation to neglect and physical abuse. Resources had been deployed to ensure that demand was met. Concerns were raised regarding missing children becoming invisible during the pandemic and Members were informed of the processes in place for children returning from being missing.

Additional data was requested on the suicide rates and the suicide prevention strategy in future reporting.

The Committee welcomed the report and endorsed the prevention services and the work with multiagency teams. The Committee was keen to ensure that learning was shared and applied in the HSP's approach. Notwithstanding the work that had been undertaken during the pandemic, Members agreed that the report recommendations should be amended to read 'to the extent possible, the Committee is reassured that residents coming into contact with safeguarding remained safe during the year'.

**RESOLVED:**

**That the Committee:**

- 1. to the extent possible is reassured that Hillingdon residents coming into contact with safeguarding service remained safe during the year.**
- 2. is updated regarding the way in which the partnership has responded to the challenges posed to Safeguarding by the Covid 19 Pandemic.**
- 3. is informed of the strategic priorities for safeguarding for 2021-22.**

This page is intentionally left blank



# Hillingdon Safeguarding Partnership Annual Report 2020-2021



## Table of Contents

1. Executive Summary .....	3
2. Independent Scrutiny .....	5
3. Hillingdon Safeguarding Partnership: Safeguarding Arrangements .....	7
4. Progress against Safeguarding Priorities .....	9
4.1. Safeguarding Children Partnership Priorities.....	10
4.2. Safeguarding Adults Priorities .....	12
4.3. Shared Priorities .....	13
5. Learning from Practice.....	14
5.1. Serious Cases: Children.....	14
5.2. Serious Cases: Adults .....	16
6. Safeguarding Training Programme .....	18
7. London Borough of Hillingdon – Children's Services .....	20
8. London Borough of Hillingdon Adult’s Services.....	26
8.1. Adult Social Safeguarding Data.....	30
9. Hillingdon Clinical Commissioning Group (CCG).....	32
10. Metropolitan Police Service.....	34
11. Safeguarding Partnership Agency Contributions.....	39
11.1. Central and North West London NHS Foundation Trust (CNWL) .....	39
11.2. London Fire Brigade.....	42
11.3. Local Authority's Designated Officer (LADO) and Education Safeguarding .....	43
11.4. Uxbridge College.....	45
11.5. The Hillingdon Hospital.....	46
11.6. London Borough of Hillingdon: Tenancy Management .....	47
12. Priorities for 2021-22.....	47

## 1. Executive Summary

**“I have found a strong partnership that is open to scrutiny and challenge and one that strives to continually learn and improve practice.”**

**Alan Caton OBE, Independent Scrutineer, 2021**

This report provides an overview of the activity of Hillingdon’s Safeguarding Children Partnership and Safeguarding Adults Board. The report provides assurance around the effectiveness of our local safeguarding arrangements and evidences the impact of these arrangements in ensuring the safety of Hillingdon residents irrespective of age.

The annual report 2020-21 covers a period of unprecedented challenge for residents and those agencies that provide support and safeguarding services throughout the coronavirus pandemic. Inevitably there has been the need to adapt and refocus services to ensure that the immediate needs of children, adults, their families, and carers were prioritised and met. It is to the credit of Hillingdon Safeguarding Partners that the children and adults remained safe and supported in having their needs met and being safe. An overwhelming majority of ‘core business’ continued to be progressed throughout the lockdown periods, in the context of key members of the partnership being redeployed to meet the need in frontline services. The capacity of partners to be dynamic in response to challenge and to develop innovative solutions reflects positively on the effective implementation of our Safeguarding Arrangements and the underpinning principle of shared and equal responsibility for safeguarding.

Between January and April 2021, our safeguarding arrangements were the subject of scrutiny by an independent expert with experience of both adult and child services. The Independent Scrutineer found that the local partnerships are meeting the statutory responsibilities and did not identify any areas of poor practice or weakness in the safeguarding arrangements, noting key strengths in partnership working and that ‘the partnership is one that is built on high support, high challenge and where difficult conversations are encouraged’.

The Safeguarding Partnership has continued to make progress against all priority areas, focussing on those with greatest impact for residents. The Safeguarding Partnership has evidenced the capacity to adapt in all areas of service delivery, from frontline services to training, strategic planning and coordination of services. All agencies have risen to the

challenges of the last year, and the commitment of frontline staff across the Partnership is to be commended.

A key duty of both the Safeguarding Children Partnership and Safeguarding Adults Board is to consider any serious cases against the statutory criteria for review set out in legislation. In 2020-21 there were no statutory reviews commissioned by the Safeguarding Partnership.

In the next year the Partnership will continue to embed the use of data in the analysis of practice, and for the purpose of strategic planning. We will continue to ensure that the voices of children, adults, their families and carers are heard and prioritised and that this is well evidenced across all aspects of partnership work.

In response to local and national learning we have identified new areas of priority and will be developing our response to these through the creation of targeted subgroups addressing child sexual abuse, mental health and safeguarding and self-neglect. In addition, supporting the effective implementation of Hillingdon Council's innovative model of early help, Stronger Families, will be a key focus for the Safeguarding Children Partnership.

## 2. Independent Scrutiny

In January 2021 Hillingdon Executive Leadership Group commissioned Independent Scrutiny and Review of the Adult and Child Safeguarding Arrangements. This task was fulfilled by Alan Caton OBE, an experienced independent safeguarding professional and retired senior police officer. The terms of reference for scrutiny were developed in line with the 'Six Steps to Independent Scrutiny' model developed by the University of Bedfordshire. The review took place over 7 days and focused on systemic safeguarding arrangements. To inform the process meetings were arranged with representatives across the adult and child safeguarding networks. The Outcome letter is published in full on the Safeguarding Partnership Website, and the Safeguarding Adults Board website, a summary is provided below.

'The Hillingdon Multi-Agency Safeguarding Arrangements for both children and adults comply with their statutory responsibilities. The arrangements for both children and adults are clear and have been published in accordance with statutory guidance.

I found that good relationships have been built between partners, both statutory and non-statutory, and that there is a real willingness for the safeguarding partners to work together to seek out vulnerable children and adults and to provide them with the best possible services. It is apparent that there is a strong sense of partnership across Hillingdon and a desire to continually improve services. There is a clear meeting structure and delivery model which is supported by multi-agency subgroups.

During the review I found a number of areas of good practice. Communication links between the partnership is good with the regular distribution of the PSW Practice Briefing Newsletter which highlights key safeguarding issues and operational updates. In addition, I also found the 7-minute briefing tools which are available to provide practical and accessible information to practitioners to be an excellent resource. A number of these briefings are available on the Hillingdon SCP website and cover key issues around particular themes that are important and relevant to safeguarding children and adults, including briefings to highlight the learning from serious case reviews.

Areas for consideration:

- Chairing arrangements for the Safeguarding Adults Board
- The publication of a local threshold document for Hillingdon Safeguarding Children Partnership
- To consider how best to ensure all relevant partners provide clearly analysed data as requested by the Children's and Adult's Partnerships
- To consider developing a formal process to ensure the voices, views and needs of children, families and vulnerable adults are captured
- To consider how best to build strategic relationships across the safeguarding system

There is strong leadership from the ELG and a clear sense of joint and equal responsibility from the three safeguarding partners. The partnership is one that is built on high support, high challenge and where difficult conversations are encouraged.

Attendance at both the children's and adult's partnership Boards and associated subgroups is good and has good representation from the wider partnership. There is excellent engagement from leaders across the partnership who set a culture which drives improvement activity. There is a clear structure and good links between the children's and adult's partnership arrangements, however improved links with other strategic boards would enhance effectiveness.

In conclusion there are, in my view, many strengths to the safeguarding arrangements for both children and adults across Hillingdon. I have found a strong partnership that is open to scrutiny and challenge and one that strives to continually learn and improve practice. I have not come across any areas of poor practice or weaknesses in the safeguarding arrangements. The areas I have outlined for the partnership to further consider, are there to help the partnership on its journey to improve collaboration and coordination and therefore consequently, to improve outcomes for children, families, and adults in Hillingdon.'

Alan Caton OBE

Independent Scrutineer

### 3. Hillingdon Safeguarding Partnership: Safeguarding Arrangements

This report provides an overview of the activity of Hillingdon's Safeguarding Children Partnership and Safeguarding Adults Board. The report seeks to provide assurance around the effectiveness of our local safeguarding arrangements, and to evidence the impact of these arrangements in ensuring the safety of Hillingdon residents irrespective of age.

The annual report 2020-21 covers a period of unprecedented challenge for residents and partner agencies that provide support and safeguarding services due to the coronavirus pandemic. Inevitably, there has been the need to adapt, and refocus, services to ensure that the immediate needs of children, adults, their families and carers were prioritised and met. It is to the credit of Hillingdon Safeguarding Partners that the overwhelming majority of 'core business' continued to be progressed throughout the lockdown periods. The capacity of partners to be dynamic in response to challenge and to develop innovative solutions reflects positively on the effective implementation of our Safeguarding Arrangements and the underpinning principle of shared and equal responsibility for safeguarding.

In September 2019 the Hillingdon Safeguarding Children Partnership was launched in line with the statutory requirements set out in the Children and Social Work Act 2017 and Working Together to Safeguard Children 2018. Under these arrangements the Local Authority shares responsibility with our statutory partners, the NHS North West London Clinical Commissioning Group (CCG) and Metropolitan Police, to safeguard children and young people in Hillingdon.

The vision of the Safeguarding Children Partnership is for every child and young person to be and feel safe, enjoy good physical, emotional and mental health, have pride in their unique identities, feel that they belong and have opportunities to thrive. The three statutory partners work alongside other relevant agencies in achieving this goal.

The Safeguarding Adult arrangements set out how the Safeguarding Adult Board will discharge the council's duty to work collaboratively to optimise the safety, wellbeing, and quality of life of adults with care and support needs, their carers and families. In order to achieve this the Board must raise awareness, minimise the risk of abuse, neglect or self-neglect occurring, and ensure our response is timely, proportionate, effective, and

underpinned by the key principles of safeguarding adults when it does occur. The Safeguarding Adult Board's vision is for Hillingdon citizens, irrespective of age, race, gender, culture, religion, disability or sexual orientation to be able to live with their rights protected, in safety, free from abuse and the fear of abuse.

To ensure the success of the shared arrangements we have a joint Executive Leadership Group (ELG) that provides governance, leadership, oversight and challenge to both Boards. The ELG consists of the Local Authority's Chief Executive, the Chief Nurse of Hillingdon NHS Clinical Commissioning Group and the Metropolitan Police Service Borough Commander. This group has joint and equal responsibility for safeguarding in Hillingdon. Each partner is subject to internal scrutiny in accordance with their internal governance structures. In addition to this, the ELG has commissioned independent scrutiny of the Hillingdon Safeguarding Partnership arrangements for both children and adults to provide independent critical challenge and appraisal that will support future developments.

The main engine of the safeguarding arrangements for children is the Safeguarding Children Partnership Board and, for adults, the Safeguarding Adults Board. The Boards have oversight of safeguarding practice and performance, resolving issues as they arise. Where this is not possible, the issue will be escalated to the relevant organisation(s) via the Implementation Unit and if the individual organisation(s) still cannot resolve the matter, it is escalated to the Executive Leadership Group to resolve. To reflect the vision of joint and equal responsibility the Boards are chaired on a yearly rotating basis by a representative of the three statutory partners. In the second year of the arrangements the Children's Partnership Board has been chaired by a representative of the Local Authority, and the chairing arrangements for the Safeguarding Adults Board remained unchanged, this decision was made due to the need for consistency and in recognition of the pressure faced by partner agencies in response to the pandemic. The Boards steer learning and development for the safeguarding environment across the London Borough of Hillingdon, and are informed by subgroups, as well as task and finish groups, as required.

The Safeguarding Partnership Implementation Unit provides support and drive to both the Adult and Children's Partnerships. The unit consists of a Quality and Implementation Manager, a Project Support Officer and three Advanced Social Work Practitioners. A key focus of the team is to facilitate, develop and reinforce links between the Safeguarding Children



Partnership and The Safeguarding Adults Board. The team also seeks to develop links and coordinate activity and delivery with the other strategic boards across the council and in the Pan-London Safeguarding context.

#### 4. Progress against Safeguarding Priorities

Over the year 2020-2021 Hillingdon Safeguarding Partnership has focussed work on the key priority areas agreed by the Safeguarding Children Partnership Board and Safeguarding Adult Board. As might be anticipated, at times, it has been necessary to be flexible in response to the demands placed on key partners particularly those with frontline health responsibilities. It is to the credit of the partnership that in the face of extraordinary pressure progress has been made against all priority areas.

The Safeguarding Partnership has been responsive to developments within the local, national, and international context. Senior Leaders across the three statutory partners met regularly to identify, address, and respond to any issues as they arose.

Throughout the pandemic agencies have been alert to the impact of isolation on children, families, adults, and their carers. Awareness raising activity has been undertaken in recognition of the increased risk of abuse and neglect on children, and the impact of isolation on mental health and domestic abuse. Parallel working with other strategic groups including the Community Safety Partnership and Health and Wellbeing Board has further supported the effective coordination of safeguarding across a wide range of services and need.

Central to the work of the Partnership is to ensure that we seek out, listen to and respond to the voices of Hillingdon residents. In 2020-21 this has been made more complex due to the limitations placed on face to face contact. To mitigate this the Partnership has sought feedback and input from our Children's Participation Service and is contributing to the Pan-London Voice of the Adult Programme. The importance of the voice of the individual is reflected in the focus of partnership quality assurance activities, both single and multiagency, and is threaded through the work of all subgroups. In the next phase of the partnership this will be formalised into an overarching engagement strategy.

To reflect our ethos of shared and equal responsibility for safeguarding the children's subgroups are chaired by a diverse range of partner agencies, with support provided by the implementation unit. This approach carries the additional benefit of ensuring that each subgroup is chaired by a strategic safeguarding lead with the most applicable professional expertise. Subgroups are well attended across all aspects of partnership work, statutory partners are represented in all, with relevant agencies attending according to the focus of the subgroup. It is recognised that there is an opportunity for more diverse chairing arrangements for the subgroups focussed on safeguarding adults.

#### Safeguarding Children Partnership Priorities:

- working with young people at high risk of exploitation,
- neglect,
- children with complex needs and disabilities,
- safeguarding in education,
- early help.

#### Safeguarding Adults Board Priorities:

- financial abuse and exploitation,
- domestic abuse,
- making safeguarding personal.

#### Shared Priorities

- modern slavery,
- Joint strategic safeguarding and trafficking.

#### 4.1. [Safeguarding Children Partnership Priorities](#)

The Strategic High-Risk Panel is co-chaired by the Metropolitan Police and Children's Social Care, the Panel focuses upon the risks faced by young people in consequence of extra-familial harm through the adopting a contextual safeguarding approach. The tasks of the Panel are developed from data provided by the Operational High-risk Panel, and any themes or developing issues identified through the analysis of data across all agencies. The focus of the subgroup is to coordinate action across the partnership in reducing the risks that children and

young people could suffer harm due to criminal and/or sexual exploitation or involvement in serious youth violence.

Neglect has continued to be a focussed area of practice for the Safeguarding Partnership, the neglect subgroup is chaired by one of our Named Nurses for Safeguarding. In 2020-21 the subgroup coordinated the relaunch and delivery of Graded Care Profile 2 training to a multiagency group; over 4 sessions 80 practitioners across social care, health, early years and education service became licensed to undertake Graded Care Profile assessments. The Partnership also made a successful application to participate in an NSPCC led pilot for the development of Graded Care Profile 2 Antenatal (GCP2a). Training will be provided for midwives and social workers in completing GCP2a pre-birth. The GCP2a pilot was due to start in January 2021 however this has been rescheduled due to the pandemic. The neglect subgroup has achieved all stated aims for 2020-21. A baseline audit of the use of GCP2 within child protection plans was completed in December 2020, this will be repeated towards the end of the financial year to allow us to measure the impact of focussed work around Graded Care Profile.

In 2020-21 work has continued to refine the partnership offer around early help services, with the development of the Hillingdon's Stronger Families approach. The Stronger Families model is based on the principle that children and their families receive support at the earliest stage, to reduce the impact of any difficulties, promote familial wellbeing and ensure that children are supported to thrive and meet their full potential. The Stronger Families model is locality based, with three geographical hubs, each supporting their local community. The new model will be launched in the summer of 2021.

The Safeguarding Children with Complex Needs and Disabilities subgroup formed in the summer of 2020 with a remit to understand, influence and develop the partnership response to safeguarding children with additional needs. It is recognised that children with disabilities are more vulnerable to abuse and neglect and, often, less able to seek help and support where needed. The group is chaired by the Designated Nurse for Safeguarding at the North West London Clinical Commissioning Group. Since its inception, this group has led on the identification and dissemination of communication tools and strategies to support practitioners in listening to the communication of children with additional needs. The group

has drafted multiagency practice guidance and commenced a multiagency audit. These tasks will conclude in the next financial year.

In recognition of the additional risks faced by children who were not able to attend school during the lockdown periods an Education Safeguarding Task & Finish Group was developed. This group is jointly chaired by the Child Protection for Schools Advisor, and the Head of Access to Education. During the reporting period the group has reviewed and updated key policies and procedures in respect of children who are missing from education, and unregulated provision. This work has successfully built links with health services to improve the tracking and safeguarding of children who are not attending school.

#### 4.2. Safeguarding Adults Priorities

The Making Safeguarding Personal (MSP) subgroup is chaired by Adult Social Care as the lead agency with responsibility for adult safeguarding. Progress against the stated aims of the subgroup has been mixed, in large part due to the impact of the pandemic on frontline services. A practitioner briefing was produced and circulated, and assurances sought around single agency training and the inclusion of MSP principles within agency policies, procedures, and practices. Following discussion at the Safeguarding Adults Board in November 2020 the Implementation Unit reviewed and refreshed the action plan to ensure a sharper focus with measurable outcomes. The principles of Making Safeguarding Personal are woven through the approach of all adult subgroups, this is demonstrated in the creation and dissemination of easy read guides to domestic abuse, and information about staying safe during the pandemic. The Making Safeguarding Personal multiagency audit has started and will conclude in the first quarter of 2021.

The Financial and Material Abuse subgroup is chaired by the Implementation Unit. This subgroup first met in January 2021. The group has a diverse representation to reflect the complexity of Financial and Material abuse and has developed a comprehensive plan to raise awareness of issues, prevent abuse from taking place where possible, develop a framework for individuals to seek support, and to ensure that services respond appropriately where abuse is taking place.

The SAB's Domestic Abuse priority has been progressed by the Implementation Unit in conjunction with the Hillingdon Community Safety Partnership. To reduce duplication and ensure coordination of services for those affected by domestic abuse, the work around adult safeguarding was incorporated into the existing Domestic Abuse Steering Executive. This included a review of recommendations highlighted in the London Domestic Homicide Review and Case Analysis published in September 2020. The recommendations within this report were used as a framework to understand local practice in Hillingdon and will be incorporated into the updated Hillingdon Domestic Abuse Strategy. In recognition of the additional risks victims of domestic abuse faced due to the pandemic the Violence Against Women and Girls (VAWG) lead produced monthly briefings for professionals, these were widely circulated. The Implementation Unit also identified and circulated easy read guidance to seeking help and support and developed an easy read guide to local support services. This joined up strategic approach will be further developed in the next year with a joint subgroup across the Community Safety Partnership, Safeguarding Adults Board and Safeguarding Children Partnership.

#### 4.3. Shared Priorities

The Joint Strategic Safeguarding and Trafficking Subgroup (JSSAT) is unique to Hillingdon and reflects our specific needs as a 'port' authority due to the location of Heathrow Airport in our Borough. The subgroup coordinates the multiagency response to the risk of children and adults arriving in the borough and being victims of trafficking and exploitation. The group spans across the two partnership boards, it is chaired by a senior officer of the UK Border Agency and member of the Safeguarding Partnership Implementation Unit and works closely with the wider partnership to provide proactive and reactive responses to safeguarding matters related to the airport.

During the pandemic there was a huge reduction in air traffic, and consequently a reduction in the number of people accessing the airport and presentation of acute need. As lockdown eased and air travel restarted there was an increase in presentation of unaccompanied asylum-seeking children. The subgroup has identified the need for improved coordination of the various safeguarding processes that are in place, these are manifold due to both the scale of the airport, and the wide range of individuals that use it with a variety of needs. The subgroup has worked with Border Force to develop information for airlines to support in the

early identification of trafficking and exploitation. This is sensitive work due to the potential to inadvertently increase risk to individuals in their country of origin. Training has also been made available to all airport staff.

The shared Modern Slavery Subgroup is chaired by the Implementation Unit. The subgroup has a remit to promote awareness of issues of modern slavery across all partners in Hillingdon, to develop a referral pathway that is consistent and applicable across the partnership and to identify resources and supports available for potential adult and/or child victims. In 2020-21 the subgroup has driven practice in this area and a consistent referral pathway has now been finalised. In addition, the group linked with national centres of expertise to develop briefings, an eLearning module, resource guide and local multiagency practice guidance. The modern slavery subgroup has achieved all agreed aims for 2020-2021.

## 5. Learning from Practice

Learning and embedding change into practice is one of the key principles of the two partnerships. We acknowledge that learning can be gained from recognising good practice but also from those circumstances where we, as a partnership, could have responded differently to a child or adult's circumstances. Systemic learning and practice improvement is not only based on local experience but includes that which stems from regional and national research, policy and practice. This approach seeks to ensure that safeguarding practice in Hillingdon is research informed and evidence based and that our residents receive services that are of a high standard delivered by a partnership that strives to continuously improve.

A fundamental duty of both the Safeguarding Children Partnership and Safeguarding Adults Board is to review those cases that may meet the criteria for a statutory review of practice. This review process is undertaken in line with the statutory guidance set out in Working Together to Safeguard Children 2018, and the Care and Support Statutory Guidance 2014.

### 5.1. Serious Cases: Children

A notification to the notification to the Child Safeguarding Practice Review Panel (the National Panel) is made when a child has suffered serious harm, and that abuse or neglect is known or suspected. For each serious incident notification, a multiagency Rapid Review is

convened to bring together and consider information known about the child by all agencies involved and to identify any areas of learning. The Rapid Review is held within 15 working days of the notification, with a report detailing the circumstances of the child, the actions of involved agencies, any learning identified and a decision around Local or National Child Safeguarding Practice Review. The full information about the case, the notes of the meeting and the Rapid Review decisions are shared with the National Panel which has the function to review and scrutinise and ratify the decisions made by the Rapid Review.

During 2020-21 there have been five cases that have met the criteria for a serious incident notification to the Child Safeguarding Practice Review Panel. The number of notifications made by Hillingdon is in line with the national picture, where Local Authorities have most commonly made between five and seven serious incident notifications. Of the Rapid Reviews convened by Hillingdon Safeguarding Partnership 100% occurred within timescale with 100% of recommendations ratified by the Child Safeguarding Practice Review Panel. This is dissimilar to the national statistics which show that overall, only 29% of the Rapid Reviews happen in time and only 69% of the decisions are ratified by the National Panel. The successful implementation of the Rapid Review process reflects the widespread commitment across our partnership to reflect, learn and improve practice where needed. This shows strong professional relationships in a partnership which, as described by the independent scrutineer, is “built on high support, high challenge and where difficult conversations are encouraged.”

In four of the five cases the criteria for a child safeguarding practice review were not met. Where areas of learning have been identified through the rapid review process these are progressed by the most appropriate subgroup of the Safeguarding Children Partnership. The Rapid Review process also highlights areas of good practice, both within individual agencies and in respect to multiagency working.

One case was assessed as meeting the criteria set out in Working Together to Safeguard Children 2018. In this circumstance the Partnership considers the benefit of undertaking a local child safeguarding practice review. For this case, comprehensive information had been gathered and analysed at the Rapid Review stage. This meant that the areas of learning were identified quickly, and action could be taken to implement the recommendations. An action plan is in place to implement the recommendations of the Rapid Review. It is anticipated that this will conclude in the first quarter of 2021-22.

## 5.2. Serious Cases: Adults

The Hillingdon Serious Case Panel is chaired by a Metropolitan Police Detective Superintendent with responsibility for safeguarding. It has a core membership of senior representatives from key agencies, with others mandated to attend according to the specific requirement of the case. The purpose of the Panel is to review those serious cases that may meet the criteria for a Safeguarding Adult Review as specified in the Care Act 2014.

Where the criteria are met for a statutory review, the Serious Case Panel will set the terms of reference, monitor the progress of the review and quality assure the final report. The decision to undertake a Safeguarding Adult Review is agreed by the Executive Leadership Group. Where it is identified that a learning review would be of benefit this task is passed to the Practice Development Forum. Depending on the specific circumstances of the case learning reviews can be undertaken locally, or with the appointment of an independent chair.

The Serious Case Panel has considered 15 cases during 2020-21. It is important to note that during this period several "legacy" cases have been progressed, alongside those that reflect current practice. Of those 15 cases, 1 is a Safeguarding Adult Review lead by another local authority that members of Hillingdon Safeguarding Adults Board are contributing to. 6 cases have progressed to a form of learning review, 3 cases have required learning identified at panel to be disseminated across the partnership. 4 cases have been assessed as not meeting the criteria for further review and 1 case requires additional information to progress.

Of the cases considered by the Serious Case Panel 66% were adults who had significant mental health issues. 40% of cases featured self-neglect/neglect as a contributory factor. For this reason, a recommendation was made to the SAB that Mental Health & Safeguarding and Self-Neglect are focussed areas of work in 2021-22. A review of the Serious Case Panel process is currently being completed, with the aim of refining our local system and supporting our colleagues in Public Health to develop and implement a process for identifying learning from cases of suspected suicide.



### 5.3. Practice Development Forum

The focus of the Practice Development Forum is to ensure that learning from any statutory or non-statutory review, local or national, is disseminated across the safeguarding partnerships as required. The Practice Development Forum also considers learning from audits and other statutory reviews. The group has a core membership across both partnerships, in recognition that learning from serious cases usually has applicability across both sectors. There are two affiliated Task & Finish groups, one for child focussed cases, and one for adults. These groups complete learning reviews, and ensure the implementation of recommendations, and progression of actions arising from Rapid Reviews and the Serious Case Panel.

In the last year the children's group has developed the Hillingdon Paediatric Strategy Discussion Protocol. This protocol provides guidance to practitioners and managers around the inclusion of relevant health professionals, and other involved agencies, in strategy discussions. The development of the protocol included negotiating the availability of paediatricians to attend strategy discussions in specific circumstances. The group also complete a learning review in respect of the partnership response to neglect, and a learning review regarding child sexual abuse in the family environment.

The adult focussed Task and Finish group has concluded two learning reviews in the same period and revisited the recommendations made in the AA BB SAR that was published in 2018 to provide assurance that these had been both implemented and sustained. Our Task and Finish Group also considers the transferable nature of learning arising from single agency reviews. We have one learning review ongoing in respect of this.

The Implementation Unit has adopted the use of "7-minute Briefing" documents to share key information, learning and research with busy frontline practitioners. These briefings are designed to provide a high-level overview of the key issues, and to promote conversation, reflection, and practice improvement across the partnership. Safeguarding Leads are asked to disseminate these within their agency, and they are made available on the SAB and Safeguarding Partnership websites.

## 6. Safeguarding Training Programme

The purpose of the Safeguarding Partnership training programme is to ensure that practitioners have the most relevant and up to date opportunities for ongoing professional development.

Training courses are offered in the following areas:

- Initial Working Together to Safeguard Children (and Refresher)
- Adult Safeguarding
- Core Groups and Child Protection Plans
- Trauma Informed Practice
- True Honour: Female Genital Mutilation
- True Honour: Modern Slavery
- True Honour: Forced Marriage
- Reducing Parental Conflict – for practitioners and ‘train the trainer’
- Domestic Abuse: Awareness and Impact on Children and Young People
- Domestic Abuse: Intimate Partner Violence
- Child Sexual Exploitation: A Trauma Focussed Approach
- Child Sexual Exploitation: Boys and Young Men
- Traffic Light Tool: Harmful Sexual Behaviour
- Preparing for Mandatory Relationship and Sex Education
- Sex Pressures and Social Media
- Walking in Our Shoes Training
- Neglect
- Graded Care Profile

All face-to-face training sessions booked for the first quarter of 2020 were postponed in consequence of the need to ensure the safe and effective transition to remote learning. The Quality and Implementation Unit worked with training facilitators to modify and redevelop their offer. By the second quarter of the year all training was provided remotely, and this timely and efficient shift to a new delivery model led to a total of 1,139 practitioners attending safeguarding training during the year a number that is only 7% lower compared with the pre-covid year

The Quality and Implementation Unit also completed a review of all training provided by the Safeguarding Partnership, quality assuring content and implementing a feedback system for ongoing assurance. An analysis of training evaluation shows that the training had the right content, was relevant to people's roles, was accessible, and clear. Some of the feedback analysed indicated that:

- 97% of delegates rated their understanding of the topic after training as very good to excellent
- 92% rated the quality of the training as very good to excellent
- 94% of delegates agreed or strongly agreed that they could apply learning from the training to their practice area

## 7. London Borough of Hillingdon – Children's Services

In response to COVID-19, we had to rethink how to operate and continue to provide services for those most in need of care and support. Children and young people who have an allocated social worker remained one of the most vulnerable groups before and during the pandemic. Whilst our statutory functions remained the same, we needed to, very quickly, adapt our service delivery and find ways to fulfil our duties in very different circumstances. Our response commenced in early March 2020, initially operating with many unknowns whilst waiting for national and sector guidance.

Our response focussed on safeguarding our vulnerable children and discharging our duty of care to our staff and colleagues. Risk assessments considered the potential of a decreasing workforce due to Covid infection. Cover and duty arrangements were put in place at all levels as well as the reviewing of the operational procedures by practice leaders and the principal social worker.

Social Workers and Managers in Children's Social Care have experience of working in a flexible way, as a lot of the work undertaken occurs in the community, therefore the shift to working from home was not as problematic as it potentially could have been. Safe working practices were addressed both on individual and service basis (for instance guidance on safely completing video meetings with families and children).

All children were risk assessed by the people who knew them best (Team Managers and allocated workers) and the type and frequency of contact was decided for each child. Most children subject to a Child Protection plan continued to be visited face to face. 92% of the Child Protection visits were carried out in time during this time.

COVID-19 risk assessments were conducted by social workers prior to the visit to determine if anyone in the family was symptomatic or shielding and actions were taken as required except for those instances where it would be inappropriate to contact a family in advance (Safeguarding Investigations). Some of the visits were completed in open spaces (front door, gardens) and PPE was issued as it became available alongside clear guidance developed by the service on how and when to utilise it.

During the lockdown period we kept in contact with all children who have an allocated social worker and/or key worker. Most children subject to CP Plans continued to be seen in person

alongside some other children subject to both CIN and LAC Plans based on assessment of risk and need. Other children where risks assessment indicated that visits could be scaled back for a period were contacted via video and telephone calls, many as often as once per week.

The feedback from our children was positive regarding engagement and they appreciated being in touch with their Social Worker and their Independent Reviewing Officer. Increased concerns were acknowledged for some of our care leavers who were living independently on their own and with reduced family networks were struggling with social isolation more than others. Increased contact with their Personal Advisors was put in place via phone and video call.

Child in Need meetings, Child Protection Conferences and Looked after Reviews were moved to virtual platforms. Feedback from families, children, partners, and our staff has been positive. 98% of the Child Protection Reviews took place in time as well as 97% of the LAC reviews. The engagement of other agencies increased due to the virtual nature of the meetings, many families and young people were more engaged as they were not in the sometimes-intimidating environment of a formal meeting with the professionals in the room.

As part of the recovery planning, it is acknowledged that virtual meetings work well but at the same time there are clear benefits for the Social Worker and/or the chair of the meeting to meet with young people, carers and parents and therefore moving forward we will be adopting a blended approach that will allow for some participants to be present in the room and others to join in virtually.

Our Looked After Children who have direct contact with their families either in the community or in our Contact Centre had contact moved to virtual platforms during lockdown periods. Covid Secure risk assessments of our contact venues were undertaken to ensure face to faced contact where that was appropriate. One of our Children's Homes for children with disabilities promoted contact with parents in a specifically developed place in the garden of the unit whilst ensuring both social distance and the use of PPE as required. We found and following feedback from children themselves, that virtual platforms to have contact often fits better into the children's routines and gives them more control and therefore the use of virtual contact going forward will continue alongside the use of face-to-face contact.

Courts have operated a system of virtual and hybrid hearings and the social workers and managers worked closely with our legal colleagues to ensure effective hearings took place. It is a positive that the hearings during this period were effective and orders continued to be granted. However, as a result of Court capacity there is a backlog of hearings awaiting to be concluded.

Our Children in Care Council continued to meet during this time using Zoom and they kept in contact with one another and with the Children's Rights and Participation Team. Amongst some of the things that were provided by the team, were fortnightly newsletters in which the young people would interview senior managers in Children's Services on their experiences of lockdown, would run various competitions for our young people and provide very helpful information about activities and resources available during the lockdown.

Supervising Social Workers and children's Social Workers provided support to Foster Carers and residential units during this time in the form of advice, guidance and visits to support placements. Increased focus was placed on weekly identification of those placements which were at risk of breaking down. Three Heads of Service met every week with relevant managers and practitioners, Foster Carers and providers, to identify bespoke solutions to vulnerable placements and to ensure that our children remain stable in placements and both them and our foster carers are safe and well supported.

The service proactively reached out to all the children in LBH who were shielding to ensure they had access to food, medication, etc. staff members were redeployed from other parts of the service to support this work and the children contacted included those who were not opened to any services. Support, advice and signposting was provided as needed to the families.

Social workers and managers identified all the children who needed a laptop or access to internet to study and they received the support offered by DfE in form of Laptops and/or wireless internet. More than 800 children benefited from these so far and in majority of cases the Social Workers have delivered these to our children themselves.

In order to provide support to children and families and to reach out to those families who were supported by universal and targeted services which were not available during the summer, our Adolescents Development Service launched the #DoSomethingThisSummer

programme. This was offered over the four weeks in August. A range of programmes were developed to offer vulnerable young people positive recreational and educational activities that support personal development, offer the chance to gain new skills and learning.

There was a total of 110 individual programmes with 848 individual spaces on offer, split between online sessions and face to face open air activities. These programmes were divided into sessions for young people in school years 4-6, 7-9 and 10+. A variety of activities were offered including arts, crafts, sports, cookery and targeted issue-based sessions. Alongside these we offered a number of targeted online sessions in order to provide more intense support on a range of issues affecting young people such as trauma and bereavement, stress and anxiety, county lines, and CSE.

100% of the parents that provided feedback said that they would recommend the programme and advised that they were very or somewhat happy with the activities on offer. Parents found that the activities had a positive impact on young people's confidence and self-esteem as well as developing new skills and knowledge *"Do something this summer was a great activity that helped give my son something new and challenging but also helped as a confidence boost for him"*. One young person found that *"I was learning as well as improving my social skills"*. Feedback from young people was very positive with all who responded stating that they were very or somewhat happy with the programme offer and over 80% saying that they would definitely recommend the programme to others. One young person noted that *"I love it so much and I didn't want it to end seriously. I hope I can join again in the future. I was more than happy doing my session and sad when it came to the end"*.

During the lockdown periods, extra attention was paid to the young people who were living independently and did not have access to support networks during the lockdown. For our Care Leavers, Personal Advisors continued to keep in touch with them and for a minority of care leavers who had to shield we arranged delivery of food and medicines.

Extra staff were redeployed from other areas of service to contact all the families whose children were shielding. A specific questionnaire was applied to ensure the children were safe and the families had the support and the means of ensuring a good level of care during the period. A pathway was developed for referring any situations where safeguarding concerns have been identified

In April the Metropolitan police launched Operation Pan Pan. This was work previously undertaken but reinvigorated as a key piece of work during Covid. This operation ensured that the relevant Safer Neighbourhood Officers were aware of children on CP plans within their wards. Police Conference Liaison Officers (PCLOS) create briefings on the police system that cover Reasons, Outcomes, Admin and Risks (ROAR). This is then flagged to the relevant Neighbourhood Officer. The expectations of neighbourhood officers, were to be aware of the most vulnerable children in their communities, observe whilst on patrol, intervene as appropriate and report any concerns or issues to children's social care via the usual provision of Merlins via MASH.

In summary, the pandemic has been the biggest leadership challenge many of us faced. The service has risen to the challenge and crucial services have been delivered during the lockdown periods and beyond. Important lessons and new ways of working have been developed, implemented and now ready to be taken forward.

We saw a significant increase in number of referrals in relation to Neglect and Physical abuse and an increase in the impact of families living with Domestic Abuse, isolation, poverty and mental health. In the next financial year these continue to be priority areas of activity

Our aim is to continue to keep our children and their experiences at the centre of our work and our service development. We are asking and we are listening, and the words of our young people remind us of the distance travelled by us all during these unprecedented times.

### **Contextual Safeguarding**

Work has continued throughout the year, we have further invested in our Axis service provision, both in analytics and in Early Help offer by doubling the size of the team. Adolescent Development Services have been reviewed and new practice models implemented to enable us to meet emerging needs of Young People. We have continued to use Axis intelligence to deploy our Mobile and detached team to areas of greatest need and to support multi-agency response to risk.

In 2019 a young adult (HS) was killed in a knife crime incident within Hillingdon Civic Centre whilst attending an intervention. Over the last year we commissioned a bespoke review to the review the circumstances and consider any learning for the Council and/or partners. This



was completed March 2021 with publication and action plan monitoring taking place in the year ahead.

We have strengthened our response to children in custody and their safe resettlement, ensuring community based multi agency response to emerging hot spot risk areas

We provided a virtual masterclass on safeguarding adolescents and the Hillingdon approach to over 100 social workers across West London neighbouring authorities.

Commissioned Brilliant Parents to deliver bespoke support to parents whose children are at risk of contextual harm, this has include the recruitment and training of parent champions in our local communities

### **Neglect**

We participated in the multi agency neglect audit and as a result have commissioned and delivered refresher GCP2 training for all frontline staff. We are also partnering with NSPCC to pilot GCP – Antenatal assessment tool.

### **Safeguarding Children with Complex Needs and Disabilities**

We have updated and published our short breaks offer, which includes commissioning for Mencap as a provider. We have and published our personal budgets policy and aim to deliver flexible help to families at point of need that increase choice and empowerment.

We have undertaken prototyping with CAMHS/CCG to strengthen early help offer to children and young people with mental health needs.

We are actively engaged in the Learning Disability risk register process to support children and young people most at risk of entering care as a result of their complex needs.

### **Early Help**

We have spent this year transforming and laying the foundations of our early help offer which will go live in 2021/22. This includes, but is not limited to, moving to a 24/7 Stronger Families hub, locality based key working, doubling the provision of Axis and redesigning adolescent development services.

Whilst the transformation launch will take place in 2021/22 the early help offer has been essential in supporting families throughout 2020/21. Key workers have provided support for vulnerable families including the provision of practical and emotional support. Adolescent Development Services continued to deliver a range of support to young people virtually and within our communities, covering but not limited to counselling, sexual health, substance misuse, emotional and mental wellbeing, activities and personal development.

Brilliant Parents continued behalf of the Council to offer virtual parenting support to parents throughout the pandemic period.

Axis early help and mobile and detached team continued to reach out to young people at risk of exploitation and violence, providing effective diversionary services to safeguard.

## 8. London Borough of Hillingdon Adult's Services

There has been a significant increase in the number of Safeguarding Adult referrals, including Police Merlins, sent to Adult Social Care during the pandemic. From April 2020 to April 2021, the number of referrals sent to Adult MASH increased by 93% (to 1418 referrals in April 2021). During the same timeframe, the total number of referrals that progressed to a Safeguarding Adult Concern increased by 91% (to 485 referrals in April 2021).

There has been an increase in referrals related to Domestic Abuse, Self-Neglect, Mental Health problems, Self-Harm and Suicidal Ideation. Adult MASH activity, including a daily multiagency high-risk meeting, enabled partners to focus on risks, to minimise the risk of abuse occurring and ensure our responses to concerns were timely, robust and effective. To support the staff during the pandemic specific guidance was shared relating to Domestic Abuse and Self Neglect.

While the lockdown and Covid 19 restrictions required us to adapt practice related to Safeguarding Adults activity, essential visits continued throughout the pandemic in accordance with Covid 19 guidance. The guidance was developed to support staff in relation to undertaking home visits safely, having multi-agency meetings via video calls, and, where appropriate, meetings with residents via video calls. It is recognised that there are positive and negative aspects to using video calls and going forward this is an area of practice we will

retain as an option as it facilitates collaboration and enabled participants to convene quickly to share information and agree actions.

The pandemic also reinforced the dedication of our skilled and caring workforce, showing flexibility and resilience during the year to optimise the safety, wellbeing, and quality of life of our residents.

Lockdown and Covid 19 restrictions had a significant impact on care and support at home and in the community as it increased the time individuals remained at home many times on their own. Staff were reminded to review safeguarding plans and were creative and flexible in minimising the risk of abuse, neglect and self-neglect to respond to this unique situation

### **Domestic Abuse**

Minimising the risks associated with Domestic Abuse is a key priority for Adult Social Care. Adult MASH review high risk referrals at daily high-risk multi-agency meetings and this includes referrals related to Domestic Abuse. Adult MASH has strengthened collaborative working and information sharing pathways with our local Independent Domestic Violence Advocates. Adult Social Care are core members of the Domestic Abuse MARAC and have embedded in the operational practice the need to share information with relevant agencies, consider others who may be at risk, and complete a DASH risk assessment and refer to MARAC as required.

Adult Social Care continue to be dedicated to working collaboratively with The Metropolitan Police, The Children's MASH and The Safer Hillingdon Partnership to explore the creation of a Domestic Abuse One Front Door - the vision is for the creation of a single point of contact for all concerns related to Domestic Abuse in Hillingdon which would sit alongside our Adult MASH.

Adult Social Care are core members of the Domestic Abuse Steering Executive and the MARAC Steering Risk and Review subgroup.

As outlined above, guidance on Domestic Abuse during the pandemic and shared with staff to support practice in these areas and staff were reminded to review safeguarding plans in place due to the increased time individuals were at home together during the pandemic.

### **Making Safeguarding Personal (MSP)**

Adult Social Care are the lead agency in relation to ensuring the outcome(s) the adult wishes to achieve are established/recorded and achieved (where possible). In 2020-21 83% of adults were asked what they wanted to achieve. When the individual's view was established, 95% of outcomes were either fully achieved or partially achieved. The updating of our Adult Social Care case recording system was delayed due to the pandemic; however, this work is near completion and the key principles related to MSP are enhanced throughout. An Adult Social Care member of staff is the chair of the MSP sub group and Adult Social Care have been instrumental in supporting the completion of a multi-agency audit related to MSP, due to take place imminently. The vision is for Adult Social Care to embed MSP guidance, policies and procedures into the safeguarding adults framework and case recording system. This will see the safeguarding referrals reflecting the key principles of MSP as well as embedding MSP best practice guide into each stage of the work recorded in a resident's file. In addition to recording the work undertaken we aim to provide guides to help residents understand meeting agendas and minutes and to feel supported to attend safeguarding meetings. Other guides will provide information on what happens when a crime is reported to the Police (to optimise access to justice) and how to access advocacy. Also, the group are considering a way in which the views of the adults can be captured through questionnaires and other methods.

The principles of MSP are central to the work we undertake, and they are also reflected in our Safeguarding Adult Quality Assurance Framework and the regular audits undertaken.

Feedback has been sought independently by the Implementation Unit as part of the multiagency audit. Below are some of the comments received from adults:

- *"The safeguarding team were very good and told us exactly the process they would follow."*
- *The mental health nurse eventually referred to adult social services. This started a safeguarding enquiry and then I got held. I wanted space and a safe place for my children. The SW asked me lots of times what help I wanted and what I wanted to achieve"*

- *“I knew that the police and SW were trying to help. I got so many calls and text messages offering me support I didn't know it was called a safeguarding enquiry but I knew that people wanted to help.”*
- *“It [the safeguarding help] changed my environment and the atmosphere. I was helping my mum but felt trapped because I felt I had to be in the flat the whole time with my mum. I've now got a sense of freedom now that I've got my own flat.”*

### **Financial and Material Abuse**

Adult Social Care have been central to the development of the Financial Abuse subgroup action plan, enabling the work of the subgroup to be underpinned by areas identified through practice experience.

Establishing how an adult manages their finances and minimising the risk of financial or material abuse occurring in the first place will always be a key priority for Adult Social Care.

Wherever possible we support adults to manage their finances independently, however, where this is not possible, due to the risk of abuse and/or due to physical and/or mental health issues, we ensure the adult's view are central to any action taken to ensure finances are safeguarded/managed appropriately.

We will continue to be a core member of the financial and material abuse subgroup and embed the outcomes of the group into our operational procedures.

### **Think Family**

Adult MASH is now co-located with Children's MASH, and this has strengthened our collaborative approach to safeguarding and “think family”. Children's MASH attends the Adult MASH daily high-risk meeting to ensure an “whole family” consideration and planning as required.

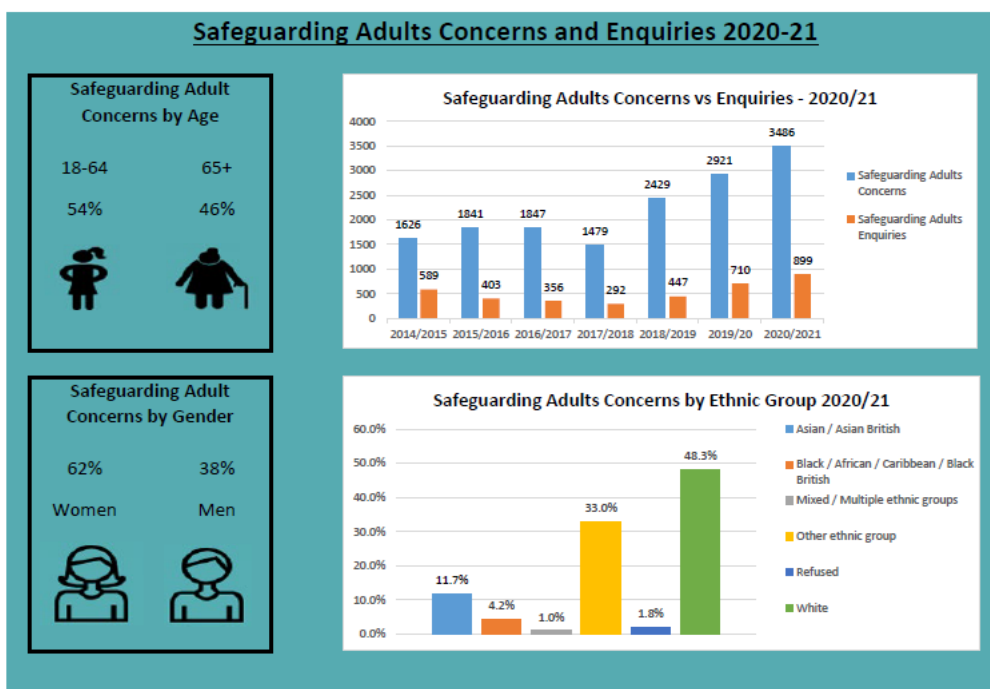
We have developed our response to transitional safeguarding and the need to apply our safeguarding adult framework where children have experienced abuse or neglect but are now 18 years of age or older. This is to enable continuity in care, support and protection plans and a seamless transition from Children's Services to Adult Social Care where this is required.

Adult Social Care work in partnership with Children’s Services in relation to children with disabilities and their families to ensure that care and support for the child, their parents and/or carers is seamless, therefore minimising the risks of harm occurring.

**Modern Slavery and Human Trafficking**

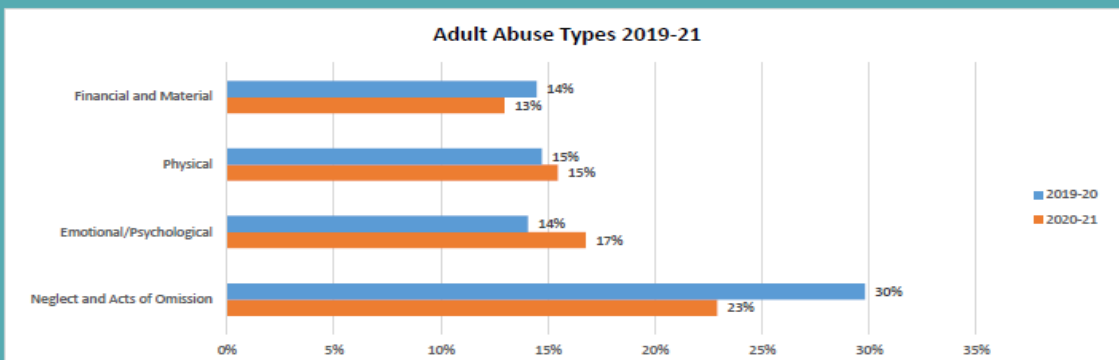
We have a designated lead for Modern Slavery and Human Trafficking within our Adult MASH Team and have embedded local operational procedures in accordance with our statutory duties to ensure appropriate action is taken to safeguard individuals when concerns related to Modern Slavery and Human Trafficking are received.

8.1. Adult Social Safeguarding Data



**Reported Safeguarding Adult Concerns**

The graph below outlines the four most common types of abuse reported to Adult Services in both 2019-20 and 2020-21. There has been an increase in Emotional and Psychological abuse 2020/21. Safeguarding concerns with a recorded abuse type of Neglect and Acts of Omission has fallen to 23% in 2020/21.

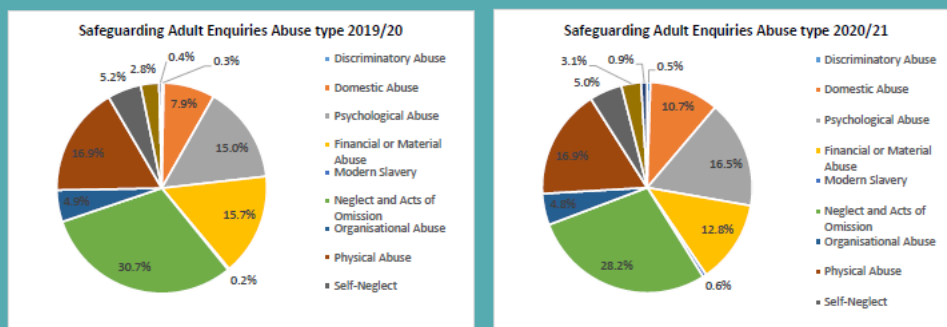


**Safeguarding Adult Enquiries**

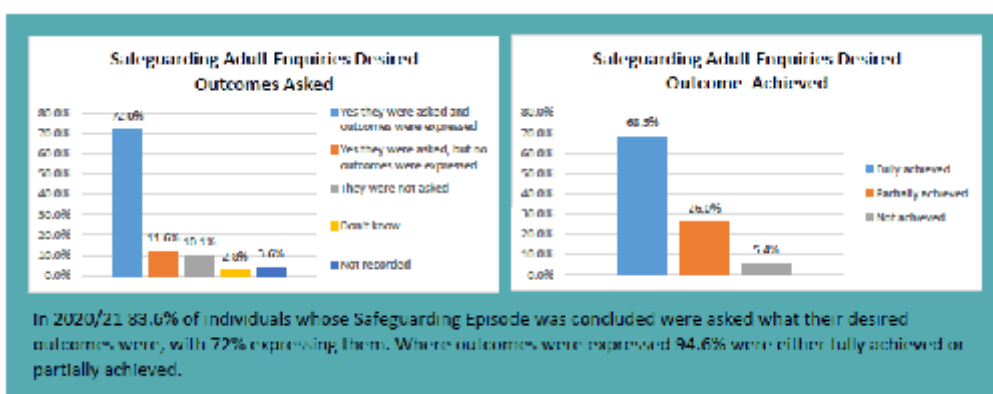
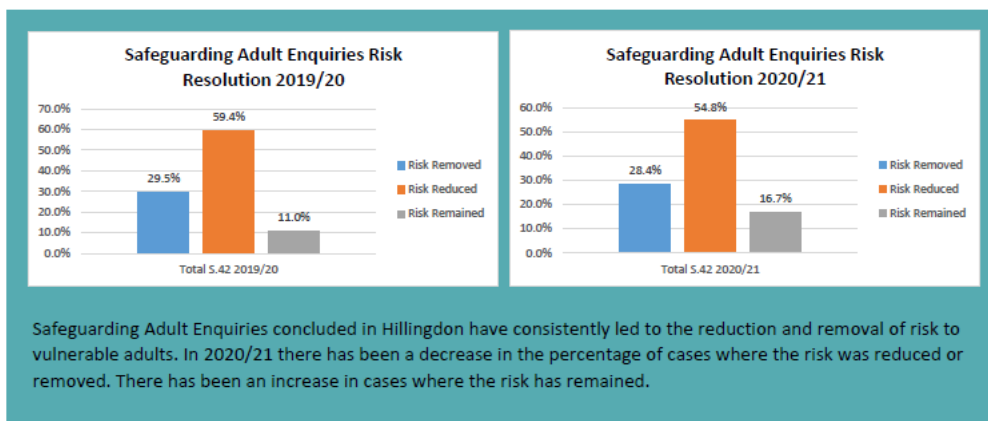
Section 42 of the Care Act 2014 places a duty on Local Authorities to carry out a Safeguarding Adult Enquiry when it has reasonable cause to suspect that an adult in its area (whether or not ordinarily resident there)

- has needs for care and support (whether or not the Local Authority is meeting those needs)
- is experiencing, or is at risk of, abuse or neglect;

- as a result of those care and support needs the adult is unable to protect themselves from either the risk of, or the experience of abuse or neglect.



The largest proportion has remained as neglect or acts of omission. This has decreased slightly by 2.5% from 30.7% to 28.2% in 2020/21. Conversely there has been a 2.8% increase in the percentage of cases where the abuse type is recorded as domestic abuse, 7.9% to 10.7%. A 1.5% increase can be seen in cases where the abuse type is recorded as Psychological abuse. These increases are likely linked with COVID-19.



### 9. Hillingdon Clinical Commissioning Group (CCG)

Across the Health Economy, a sharp increase in mental health difficulty, resulting in self-harm and suicidal ideation in Children and Young People, has been noted. The situation is compounded by the scarcity of Tier 4 mental health beds which is a well-documented national and, consequently, local issue. An increase in parental mental health and substance misuse presentation to health services has also been demonstrated across health providers. A rise in inflicted injury for babies under 1 year was seen nationally during the early part of the Pandemic and remains a fluctuating situation.

Due to national lockdown measures, Hillingdon has also been subject to national trends in adults safeguarding such as increased levels of concern relating to domestic abuse, financial and online exploitation, etc. In addition to adult related concerns children services have also seen an increase in criminal and sexual exploitation, on-line grooming and domestic abuse has been apparent among older children and young people. Together there remains great



concern for the past and current experience of children and young people and vulnerable adults in the family home.

NHSE London region safeguarding sub-cell meetings (set up at the commencement of the coronavirus pandemic) ensured the collation of information relating to safeguarding risk management across North West London, consequently supporting local systems for planning for any predicted change in virus status. Learning from the pandemic has been instrumental in informing safeguarding support required for commissioned services, the Safeguarding Partnership and multi-agency partners. Engagement with regional and national safeguarding networks has ensured timely dissemination of pertinent information. The adaption of training and support programmes toward virtual platforms has been vital in maintaining links with Primary Care and related health partners.

To ensure continuation of health assessments for Looked After Children a blended approach of face to face and virtual contact, guided by a risk assessment/triage document, was employed by the Looked After Children's team. This method of assessment proved popular for some children and young people, especially those of teenage years. Additional support for those children transitioning to adult services has been evident throughout this reporting period and has resulted in a number of initiatives to support children during this period, led by the health provider's Looked After Children's Transition Nurse.

The CCG is a panel member of the Partnership and as such sits on the LSCP and SAB Board(s), representing the Accountable Officer or Chief Nurse, informing the health aspect of policy and procedure.

In Hillingdon, Designated Professionals attend and contribute to all sub-groups, compliment multi-agency training, auditing, reviews and identify emerging themes or needs assessments to inform service and practice.

The Designated Nurses have been closely involved in the establishment and development of improvements to local safeguarding systems including the introduction of the new Adult Multi Agency Safeguarding Hub (MASH), the Safeguarding Children with Complex Needs and Disabilities Group, associated multi-agency audit, review of local practice guidance and future plans for dissemination of related learning. In addition, there has been robust collaborative working practice in the roll out of the Early Help Model.

Over the past year the Designated Lead for Safeguarding Adults also partnered with adult colleagues from across North West London to deliver an online training series (accessed across NWL) to hundreds of GPs aimed at improving knowledge and visibility of safeguarding adult issues and Mental Capacity Act related functions.

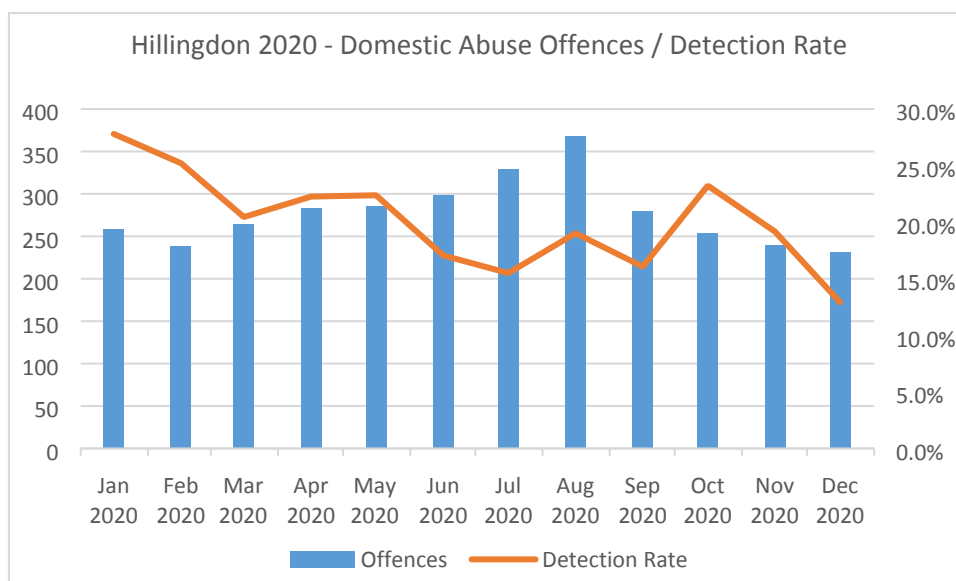
## 10. Metropolitan Police Service

The police service has risen to significant challenges over the past year, not least Covid 19, which has meant that we have had to use our resources creatively and effectively to meet the safeguarding needs of Hillingdon residents and adapt how we work with our partners. The use of technology has ensured that the essential services and meetings have been able to continue in a positive way with no detriment to the vulnerable adults and children we work with. Our specialist units continue to investigate incidents and offences of domestic abuse, child abuse, child exploitation and crimes and incidents involving vulnerable adults.

### **Domestic Abuse**

In 2020, the three Boroughs that make up West Area BCU had the highest recorded offences of domestic abuse across the Met, with 10,509 offences investigated, accounting for 11.2% of MPS domestic abuse offences. Hillingdon borough has 31.7% of the offences (3332) within West Area. West Area also manages the highest number of domestic incidents across the MPS, 18,034 recorded in 2020, accounting for 11.5% of total MPS domestic incidents.

Bearing in mind the large demand on the Community Safety Unit, West Area manages to achieve the second highest positive outcome rate in the Met at 17.3%. This compares to a Met average of 14.3%. Hillingdon performs particularly strongly in this area, with an overall positive outcome rate of 18.9% which is underpinned by the strong partnership working arrangements that continue to flourish between our Community Safety Unit and partners.



### Child Sexual Exploitation (CSE)

During 2020, West Area BCU's CSE has continued to focus activities on working with hotels, guest houses and bed and breakfasts, with a bespoke training package to help those working within the sector to be able to identify suspicious behaviour relating to child sexual and other criminal exploitation and how to report those concerns. A number of exercises have been undertaken to 'test' the safeguarding response under Operation Makesafe.

The CSE team have also made sure that the details of any accommodation provider who does not have appropriate mechanisms in place to recognise and report safeguarding concerns are brought to the attention of partners to ensure they are not used to accommodate vulnerable families or adults.

The Met have significantly improved around response to CSE and this has led to an increase in reporting to Children's Services.

October 2019 saw the inception of our Online Child Sexual Abuse and Exploitation Team (OCSAE) team, which comprises of 1 Detective Sergeant and 8 officers. The team proactively target those who exploit children on-line and have completed over 170 investigations since they were set up, the majority of which were undertaken in 2020.

**Child Criminal Exploitation (CCE)**

This area of public protection is currently managed by our CSE team and they are responsible for investigating incidents where a child is believed to have been exploited by people involved in criminal activity. This could involve organised criminal networks and gangs who groom and exploit children to hold and transport commodities, such as weapons and drugs.

Our Safer Schools officers have worked really hard to promote awareness around child criminal exploitation within Hillingdon schools. They are also working in partnership with Trading Standards, testing the due diligence of knives being sold to children from commercial premises.

**Predatory Offender Unit (POU)**

November 2020 saw the launch of our new POU. These units have been introduced across the Met in order to reduce the safeguarding risk & harm to adults and children posed from high harm offenders by adopting an enforcement approach. This unit has been created through an uplift in officer numbers. Their main work includes supporting our Community Safety Unit, Sapphire team, Child Abuse Investigation team, CSE team with a view to arrest high harm offenders who are outstanding suspects or wanted.

They also prevent and disrupt offending by developing intelligence and conducting proactive operations against high harm offenders. In addition, they enforce breaches of judicial & non-judicial restrictions for high harm offenders and ensure there are consequences for non-compliance, pursue high-harm offenders by reviewing undetected cases and exploring whether arrests/prosecutions can take place and also disrupt high harm offenders by working in collaboration with other agencies.

Since the POU started they have arrested 142 offenders and conducted a number of search warrants in relation to online child abuse investigations. They have been particularly effective in high risk manhunts ensuring timely arrest of a number of individuals wanted for stalking, rape, attempted murder and assisting suicide.

**Missing Persons Unit (MPU)**

Our Missing Persons Unit work closely with our local authority Children's Homes to act swiftly when children go missing. Relationships with Children's Services remain strong and the police provide daily updates to our children's social care colleagues. Officers are trained to conduct return interviews and these are shared with social workers to ensure appropriate safeguards are put in place where necessary and any concerns acted upon in a timely manner.

The team also work very closely with the CSE team due to many of the children who do go missing are also at risk of or have been subjected to CSE/CCE.

The MPU managed 3,236 missing people investigations in 2020, involving 2,428 people. 95% or those that go missing are found within seven days. West Area account for the third largest volume of missing people within the MPS.

**Child Abuse Investigation Team (CAIT), Sapphire**

We continue to see the benefits of a more integrated approach to public protection investigations following the move of CAIT and Sapphire teams back in to the Basic Command Unit (BCU) of West Area. This has worked well, and this alignment continues to ensure expertise and knowledge in specific areas is shared across the different strands, which ultimately enhances the quality of the investigation and promotes more effective and cohesive safeguarding.

**Mental Health**

Our dedicated mental health team continue to work hard to support those most vulnerable, who are in mental health crisis and need support and intervention. Since 2019, across West Area BCU as a whole, we have seen a 5% increase in the number of people who have been subject of S136 Mental Health Act. Between the same time parameter, we have seen a 4% decrease in the number of people in Hillingdon, where police have invoked S136 Mental Health Act.

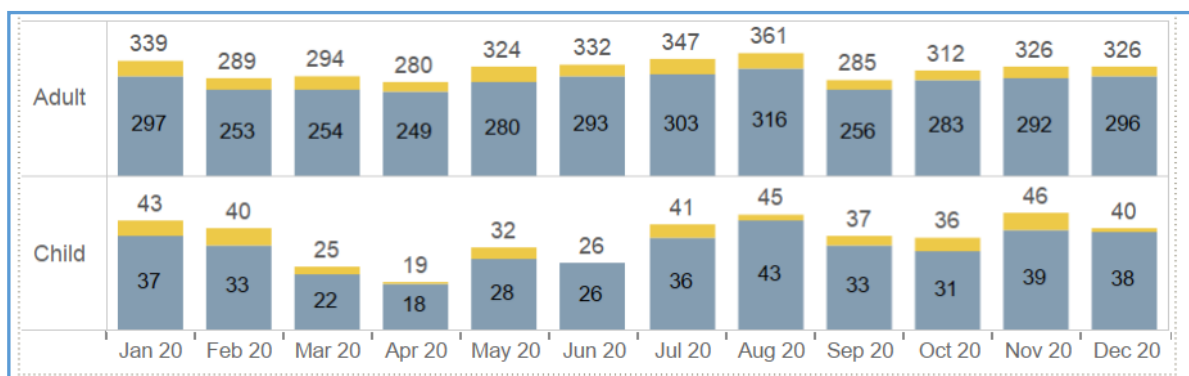
For Hillingdon, 11% (1,700/year) of all emergency calls to the police are to someone experiencing a mental health crisis. 8% (4,600/year) of all non-emergency deployments are to an incident that has a significant mental health element.

Based on those numbers the demand on policing is very significant and the Mental Health team take a pro-active approach in identifying risk and repeat demands, with close partner liaison with Approved Mental Health Professionals, Mental Health Trust, Local Authority and the London Ambulance Service.

The team continue to work with police colleagues and external partners to focus on risk management and reduction. They have developed an excellent Mental Health toolkit which has been promoted across West Area BCU and is available to every officer.

Breakdown of Adult/Child involvement in all Mental Health incidents during 2020 on WA BCU

(Blue is unique individuals, yellow is repeats)



**Safeguarding Hub**

The co-location of our CAIT referrals desk and Police Conference Liaison Officers (PCLO) in the MASH has really improved the effectiveness and timeliness of joint working. Due to the global pandemic, we have seen a move to remote working where possible, in order to protect our colleagues and the public. Every MERLIN notification continues to be assessed by the MASH team. Hillingdon MASH were dealing with on average, 1000 notifications per month which has increased over the year and continues to present challenges.

## Looking forward

Training - Like many organisations, the Met has experienced a delay to training programmes due to Covid 19. However, the public protection courses have been refreshed and are now being rolled out again in a Covid compliant format. The challenge going forward will be to ensure that all staff are trained to required standards on an initial safeguarding course which will provides valuable inputs around some of the fundamental safeguarding principles, including the referral process, strategy discussions and meetings.

Increase disruption activity around high harm offenders – the Predatory Offender Unit was expanded in March with a further two Detective Constables to ensure there are more resources targeted towards our highest harm offenders who pose a safeguarding risk to both adults and children. The POU provides our Public Protection teams a much need proactive capability to focus on such an important area.

Increase provision for repeat victims of domestic abuse - we are looking to bring together a team to focus on DVPN / DVPO's, Stalking Prevention Orders, injunctions and restraining orders, working closely with our MARAC team with the overall aim to reduce risk for our most vulnerable residents. The team will work closely with the Predatory Offender Unit and our Community Safety Unit teams.

Historic Sexual Offences/Child Abuse – we hope to create two additional teams starting in the coming months to focus on historic reports of sexual offences and child abuse. This will ensure that these lengthy and complex investigations have the focus and resource they require whilst freeing up the current teams to investigate the recent cases which often hold more immediate risk.

## 11. Safeguarding Partnership Agency Contributions

### 11.1. Central and North West London NHS Foundation Trust (CNWL)

CNWL provides a range of services to both adults and children in Hillingdon. In the first wave of the pandemic staff from health visitors, school nursing, paediatric therapies and one member of the safeguarding children team were redeployed to ward settings as they were

registered nurses, with the priority to save lives. The Named Nurses for Safeguarding Children were not redeployed and, with their team, continued to provide advice and support for staff on protecting children.

In the second wave of the pandemic all these staff remained in their post in children's services. The impact of lockdown and school closures led to an increased risk for some children. Children became hidden during covid, as some families were isolating and, in the lockdowns, they were not attending school. This was demonstrated through the identification of safeguarding concerns within CNWL services and consequently increased referrals to Children's Social Care.

To ensure our staff were vigilant in identifying risks the Safeguarding Children Team raised awareness about these areas through supervision, briefings, and training. Safeguarding Supervision for our staff continued to be offered during Covid. This was invaluable in ensuring that concerns were discussed, and support was given to staff. Our Safeguarding supervision offer (depending upon staff role) is delivered through groups or 1:1 session. In order to adapt to Covid restrictions this has been delivered through virtual sessions.

The development of the virtual world has meant that our staff have been able to easily access case conferences and other meetings. There have been positive improvements to health representation at strategy meetings and the development of the health pathway. CNWL services have adapted to providing virtual contacts for families and children where accessing the home has been difficult. Health visitors continued to offer face to face contacts where possible. The school nursing team adapted their services and used video or phone contact to maintain contact with children when the schools were closed.

Child and Adolescent Mental Health Services have been extremely busy in recent months – specifically the Urgent Care team who have been utilising extra resources to support the crisis pathway and offer brief intervention work to divert away from A and E attendance where possible and relapse prevention work to manage crises. ACTs (Assertive Community Team) have continued to operate across all of the boroughs to provide intensive treatment at home as an alternative to an inpatient admission. Earlier on in lockdown the majority of crisis presentation were by those young people who were already known to CAMHS but in the final quarter of 2020-21 there has been a twofold increase across all CAMHS urgent presentations



– young people who are both previously known and unknown. CAMHS continue to receive high numbers of referrals needing ‘urgent’ assessment (as opposed to routine), reflecting a higher acuity of presentations – increased self-harm and suicidality – in the last few months.

Throughout the Covid-19 pandemic, the CNWL Hillingdon Safeguarding Adults and Mental Capacity Act (SA and MCA) Specialist has remained working from Beaufort House. Their role has remained the same and they continued to provide support to staff. However, one change is that the annual visits they normally made to each team were put on hold but have recommenced virtually in 2021. In addition, all face-to-face training sessions were discontinued, and all training was provided by e-learning. From March 2021, virtual SA training sessions were provided.

### **Learning from the Pandemic:**

CNWL Hillingdon reported more Safeguarding Adult concerns in comparison to other Boroughs where CNWL provide services. Throughout and after the pandemic, CNWL have noted an increase in SA concerns. This is in line with other areas and has been recognised as being one of the impacts of poor mental health on the general population. CNWL recognises the importance of communication and information sharing across all aspects of practice, and particularly in respect of domestic abuse concerns. Virtual meetings were held to maintain contact with clinical services, and for the purpose of staff supervision and training. Weekly covid meetings were held for managers and staff to ensure that the latest information was shared.

Where patients had declined access to their homes virtual methods of maintaining contact were implemented, along with the promotion of self-care and training family members to deliver care where appropriate.

CNWL has maintained its position as a core member of both SAB and SCP, including representation from the Director of Quality, and contributions to the Independent Scrutiny Process. All CNWL staff are required to complete mandatory safeguarding adult training every three years, this training includes the priority areas highlighted by the SAB.

CNWL has a Trust-wife Domestic Abuse Lead. In addition, a Domestic Abuse (DA) Co-ordinator started in the service in August 2020. There is a dedicated DA page on our intranet, which staff can easily access for information and advice. Domestic abuse is included in generic SA training, which is mandatory for all staff to complete every 3 years. The Trust's third DA annual conference was held virtually on 26 November 2020, during the White Ribbon period. This was the best attended DA conference so far, with over 340 staff signing up.

CNWL have a DA Ambassador role, which staff volunteer for and over 82 staff have signed up so far. DA Ambassadors are expected to attend a 3-hour induction session and 4 forums a year as part of the role, which involves providing advice and support for staff in their services in relation to DA. DA Ambassadors also provide Train the Trainer sessions, so that staff can then provide DA training in their own services. CNWL are in the process of putting together guidance for staff impacted personally by DA and HR and Occupational Health are involved in this process.

Our SA & MCA Specialist visits each of the CNWL services in Hillingdon annually, to refresh staff regarding SA and MSP is discussed. Whenever staff contact the SA & MCA Specialist for SA advice, they are asked to confirm if they have gained consent from the service user to raise a SA concern with LBH. Even though MSP should always be considered before making a SA referral, there are certain circumstances that staff will need to raise a SA concern without a patient's consent e.g., public and vital interest.

## 11.2. London Fire Brigade

As LFB's service delivery was largely uninterrupted by the pandemic, we were still interacting with Hillingdon's community with safeguarding concerns identified and raised in the same manner. Home Fire Safety Visits were restricted to those most at risk/vulnerable, however new ways of delivering these remotely are being developed as a result of the pandemic. LFB has continued to play a key role in the Safeguarding Partnership, attending Boards and contributing to the multiagency audit.

Organisational learning from the pandemic is being captured centrally, to deliver pan-London improvements where required.

### 11.3. Local Authority's Designated Officer (LADO) and Education Safeguarding

The LADO, CP lead and DA lead offer advice, guidance and share resources to all schools in Hillingdon (including independent schools) relating to safeguarding and LADO queries. This includes the creation of specific guidance and resources when need is identified for example the creation of a separated parents and domestic abuse guidance for schools and a PowerPoint, staff briefing and KCSIE quiz highlighting peer on peer abuse.

Due to the impact of Covid, the LADO Team responded by developing new ways of working, including carrying out LADO Allegations against Staff & Volunteers Meetings, staff training and cluster meetings online.

The LADO Team also redeployed its staff to support frontline services – the Domestic Abuse Lead supported the IDVA Team, and the Child Protection Lead supported the Placements Team, both of which saw an increase in demand. This agile way of working demonstrates the commitment and supportiveness of the team to ensure children and families were prioritised.

#### LADO

The LADO service saw a decrease in the amount of referrals received this year, mainly due to schools offering on-line learning with only a limited number of students receiving face to face lessons. This offered less opportunity for inappropriate actions to be undertaken, although new allegations relating on-line issues have been made. This has resulted in fewer referrals being received from school but an increase in referrals relating to people, in their private lives, who work or volunteer with children and young people. This is against trend as our referral rate has steadily increased for the past three years. Referral statistics for the past four years:

- 2017-18 – 157
- 2018-19 – 188
- 2019-20 – 190
- 2020-21 – 147

Whilst Education staff remained the largest cohort of staff referred, there were significant increases in referrals relating to Health staff and Foster Carers. Of the 147 referrals received, 33% (44 referrals) were substantiated.

Complaints – Any complaints/Concerns, raised by the public, Ofsted, NSPCC or the Education Skills & Funding Agency are triaged by the LADO and Child Protection Lead, who, if a safeguarding concern is identified, lead on responding to these complaints.

### **Child Protection Lead for Education**

The LADO and Child Protection Lead for Education continue to provide training to school staff, and other services including foster carers, voluntary settings, faith settings and other establishments, around issues of LADO processes and level 1 safeguarding training. Training is updated yearly in line with changes to guidance and procedure, and best practice. The Level 1 Safeguarding Training slides are circulated to all Designated Safeguarding Leads to enable them to deliver to staff within schools.

### **Services offered**

Safeguarding Cluster Meetings – significant increased attendance due to meetings being held on-line. Moving forward, a hybrid method will be explored of on-line and face to face meetings.

This year, safeguarding training was delivered to School Governors over three sessions, resulting in 160 Governors receiving Safeguarding Level 1 training.

S175 & 157 Safeguarding Audit has been completed with 92 returns, 100% return rate from Local Authority Schools. The audit has been used to identify any themes across the borough where schools may require additional support from the team. One of which – Safer Recruitment Training has been devised and will be rolled out from June 2021. This course is fully booked with 60 attendees.

### **Domestic Abuse Lead for Education**

The Domestic Abuse (DA) Lead for Education has embedded Project Encompass with access made available to all schools. Project Encompass is an information sharing system that enables police to notify schools securely and directly that a child has been present in the home when there has been a domestic abuse incident. 78 schools are part of this project.

The DA Lead has an agreement with Hillingdon Women's Centre workplace safespace to work collaboratively and for schools to be directed to the DA Lead as the single point of contact for DA related issues and to attend their conference as a guest speaker regarding DA and schools.

The DA lead works with faith organisations including creating an advert on the Sikh channel, to reach the Sikh community.

The DA lead provides DA awareness training to schools, social care, Youth Offending, Stronger Families, as well as providing workshops directly to young people about Health Relationships and impact of DA.

#### 11.4. Uxbridge College

Uxbridge College provides further education mainly for 16-18's but also provides services to adults. The designated safeguarding lead for the College is a member of Safeguarding Children Partnership Board and the Strategic High-Risk Panel.

In February 2021, the college commissioned an external audit for its safeguarding practices. This was conducted by Dr Dan Grant an HMI safeguarding inspector who is respected in inspecting safeguarding in schools, colleges, and local authorities. The report was incredibly positive and stated the following:

'The college safeguarding arrangements are fully compliant with all statutory requirements.'

'The college has clear comprehensive and effective safeguarding policies and procedures which all staff understand.'

'Uxbridge College (HCUC) has very well-established and effective arrangements to ensure all decision-making processes relating to safeguarding matters remain independent from wider-college or other interests. The DSL and safeguarding officers operate within a clearly defined structure which is transparent and open to scrutiny.'

The College experienced high levels of safeguarding needs during lockdown. Increased levels of domestic violence and mental health were witnessed. Positives that arose were the use of online platforms to get professionals together and continue to effectively support young people.

The College has retained its kitemark 'Leaders in Safeguarding' in 2021 which recognises the quality of the work it does to safeguard its young people.

### 11.5. The Hillingdon Hospital

Hillingdon Hospitals NHS Foundation Trust provides services from both Hillingdon Hospital and Mount Vernon Hospital. The trust has a turnover of around £222 million and employs over 3,300 staff. They deliver healthcare to the residents of the London Borough of Hillingdon, and increasingly to those living in the surrounding areas of Ealing, Harrow, Buckinghamshire and Hertfordshire, giving them a total catchment population of over 350,000 people.

Hillingdon Hospital is an acute and specialist services provider in North West London, close to Heathrow Airport for which it is the nearest hospital for those receiving emergency treatment. Providing the majority of services from the trust, Hillingdon Hospital is the only acute hospital in Hillingdon with a busy Accident and Emergency, inpatients, day surgery, and outpatient clinics. The trust also provides some services at Mount Vernon Hospital, in co-operation with a neighbouring NHS Trust.

A strengthened safeguarding structure was implemented as a pilot from October 2020, with the development of our Safeguarding Families Team. The focus of this team is for safeguarding to be at the forefront of our clinical care. This includes engagement of frontline staff, provision of training and engagement and representation across local, national, and strategic partnerships. The Trust is a fully engaged member of the Hillingdon Safeguarding Partnership, attending all subgroups, Boards and contributing to learning and practice improvement locally. The Trust has seen a notable increase in presentation of young people with mental health needs during the pandemic. We have increased the frequency of Trust led multiagency meetings to ensure that a broad spectrum of professional expertise is available to consider individual cases, and we access the Partnership escalation procedures as required.

The Trust submitted a paper entitled 'Safeguarding Families in an Acute Health Trust during a Pandemic and Beyond' to demonstrate the impact of Covid-19 and how the service adapted in response. We are finalists for the HSJ patient safety 'NHS Safeguarding Award 2021.

### 11.6. London Borough of Hillingdon: Tenancy Management

Our service forms part of the Tenancy Management Service, we work with tenants and leaseholders who cause Anti-Social Behaviour, or who may be experiencing Domestic Abuse where there are underlying issues including mental health and substance misuse. Our role is to address, support and change behaviours to sustain a person's tenancy and prevent homelessness. On occasion where ASB is so serious we will also look to take Enforcement Action alongside support. We also support victims of Anti-Social Behaviour and Domestic Abuse and take the relevant action to risk assess, safeguard the victim, and implement support and safety measures.

During 2020-21 the service received an increase in domestic abuse referrals and an increase in the number of referrals regarding vulnerable adults being subjected to 'cuckooing'. All referrals are risk assessed and prioritised accordingly. Staff have worked throughout the pandemic from the civic centre and have continued to carry out visits to people's homes where necessary.

## 12. Priorities for 2021-22

The last year has seen considerable progress in the implementation of Hillingdon's Adult and Child Safeguarding Arrangements.

It is acknowledged that all safeguarding partners have faced a period of exceptionally high demand and pressure caused by the global coronavirus pandemic. The focus of all has now turned to recovery planning and both the Safeguarding Adult Board and Safeguarding Children Partnership have met to consider the multi-agency response needed and to identify safeguarding priorities for the coming year. The pandemic response has served to highlight the importance of effective multi-agency work, at all levels and across all services. The support of partner agencies, and residents, in our continued recovery from the pandemic will be intrinsic to the work of the Safeguarding Partnership in the next year, and beyond.

1. The Safeguarding Children Partnership has identified the following priority areas for 2021-22:
  - a. Neglect
  - b. Contextual Safeguarding

- c. Children with Complex Needs and Disabilities
  - d. Early Help Services
  - e. Child Sexual Abuse
2. The Safeguarding Adult Board has identified the following priority areas:
- a. Making Safeguarding Personal
  - b. Domestic Abuse
  - c. Financial Abuse and Exploitation
  - d. Mental Health and Safeguarding
  - e. Self-Neglect
3. To continue with shared strategic priorities across the adult and child safeguarding partnership where appropriate, The Safeguarding Children Partnership and Safeguarding Adult Board will have 3 shared subgroups:
- a. Practice Development Forum,
  - b. Joint Strategic Safeguarding and Trafficking
  - c. Domestic Abuse



## COUNCIL BUDGET - 2021/22 REVENUE AND CAPITAL MONTH 5 BUDGET MONITORING

<b>Cabinet Member</b>	Councillor Martin Goddard
<b>Cabinet Portfolio</b>	Cabinet Member for Finance
<b>Officer Contact</b>	Paul Whaymand, Corporate Director of Finance
<b>Papers with report</b>	Appendices A & B

### HEADLINES

<b>Summary</b>	<p>This report provides the Council's forecast financial position and performance against the 2021/22 revenue budget and Capital Programme.</p> <p>A net in-year underspend of £368k is reported against General Fund revenue budget normal activities as of August 2021 (Month 5). Unallocated reserves are projected to total £26,469k at 31 March 2022. This headline position is largely consistent with that reported to Cabinet for June 2021 (Month 3).</p> <p>To date, COVID-19 pressures, impacting on 2021/22, of £18,777k have been identified and are being funded by specific government grants, with £21,029k available including carried forward allocations from 2020/21. The increase in reported pressures of £2,136k relate to a change of funding, linked to an increase in the flexibility of specific grants allowing the Council to fund pressures previously covered by an Earmarked Reserve with Government funding. The Council is also retaining £10,126k of its own funding in a dedicated Earmarked Reserve to supplement government support in 2021/22 and future years as required.</p> <p>The latest positions on other funds and the Capital Programme are detailed within the body of this report.</p>
<b>Putting our Residents First</b>	<p>This report supports the following Council objective of: <i>Strong financial management.</i></p> <p>Achieving Value for Money is an important element of the Council's Medium Term Financial Plan.</p>
<b>Financial Cost</b>	N/A
<b>Relevant Select Committee</b>	Corporate, Finance & Property
<b>Relevant Ward(s)</b>	All

## RECOMMENDATIONS

**That the Cabinet:**

- 1. Note the budget monitoring position and treasury management update as at August 2021 (Month 5) as outlined in Part A of this report.**
- 2. Approve the financial recommendations set out in Part B of this report**

### **Reasons for recommendation**

1. The reason for **Recommendation 1** is to ensure that the Council achieves its budgetary objectives, providing Cabinet with the update on performance at Month 5 against budgets approved by Council on 25 February 2021 contained within **Part A** of this report. An update on the Council's Treasury Management activities is included within this section of the report.
2. **Recommendation 2** seeks approval for the range of financial recommendations set out within **Part B** of this report, which may include approval of above establishment agency appointments, acceptance of grant funding, revisions to fees & charges and ratification of decisions taken under special urgency provisions.

### **Alternative options considered / risk management**

3. There are no other options proposed for consideration.

### **Select Committee comments**

4. None at this stage.

## PART A: MONTHLY BUDGET MONITORING

### SUMMARY

#### GENERAL FUND REVENUE

5. General Fund pressures totalling £18,777k are projected in relation to the impacts of the COVID-19 pandemic and the Council's response in 2021/22. With total forecast pressures of £52,152k since the pandemic began in early March 2020 including the forecast pressure for the current financial year alongside £1,883k in 2019/20 and £31,492k in 2020/21. There has been an increase of £2,136k in the COVID-19 related pressure as a result of a revised funding strategy that allows the Council to fund further pressures from specific COVID-19 grant funding which were previously covered by Earmarked Reserves. With the pandemic continuing and local authorities at the forefront of delivering support to residents, it is possible this pressure may grow by outturn dependent on the Government's recovery roadmap and programme of support offered by the Council, as such this area will continue to be closely monitored.
6. Funding through specific COVID-19 grants and the Department for Levelling Up, Housing & Communities (DLUHC) scheme to cover 75% of income losses is expected to total £21,029k by 31 August 2021 including grant money carried forward from 2020/21. This is an increase of £4,069k since Month 3, as previously ringfenced monies have been made generally available by the Government. Given that further pressures may emerge throughout the year, the Council continues to maintain an Earmarked Reserve of £10,126k to manage further demands exceeding government funding. The Council's budget strategy included a release of £3,876k from this balance to offset the medium-term pressures impacting on retained Business Rates from the pandemic, leaving £6,250k available to manage emerging or continuing pressures.
7. On the assumption that this funding strategy for COVID-19 pressures can be maintained and any new and emerging pressures from the pandemic are met via increased funding from Central Government, an underspend of £368k is projected across General Fund budgets at Month 5, with this position being driven by an underspend against Capital Financing of £239k, alongside underspends against Development and Risk Contingency of £289k, primarily related to the homelessness contingency due to increased grant income, offset by a pressure reported against Service Operating Budgets of £160k, which is mainly driven by spend on children's services including Education, SEND and Children's Social Care offset by favourable variances within golf income, grounds maintenance and CCTV staffing.
8. While movements are reported against individual portfolios and contingency items from the position at Month 5, these have not materially affected the headline monitoring position. Taking account of the budgeted £2,421k drawdown from General Balances, this will result in unallocated General Balances totalling £26,469k at 31 March 2022.
9. Within this position, £6,664k of the £10,416k savings planned for 2021/22 are banked or on track for delivery in full by 31 March 2022, with £2,766k being tracked as being at an earlier stage of implementation and £986k at risk as a result of the COVID-19 pandemic. The at risk savings relate to leisure management fee income and reflects the acute impact of the pandemic on this sector, although it is expected that in the long run this level of income will

be achievable. Where slippage in savings delivery is expected this has been factored into the reported monitoring position, and where appropriate financed from COVID-19 funding.

10. Within the Collection Fund, a pressure of £396k is reported at Month 5, a £30k favourable movement from Month 3, with the underlying variance resulting from a slower than budgeted growth in Council Tax, offset by a favourable position reported against Council Tax Support as demand begins to fall in this area as the economy starts to recover from the pandemic. Business Rates income is currently forecasting a favourable position, primarily driven by a smaller impact of the pandemic on the rating list than originally budgeted for in February 2021.

## GENERAL FUND CAPITAL

11. The Council's £297,560k General Fund Capital Programme for the period 2021/22 to 2025/26 is projected to overspend by £752k at Month 5, with additional £2,129k borrowing over the life of the programme, reflecting additional forecast borrowing linked to the new leisure centre. There is a forecast overspend of £7,074k on the project following the receipt of tenders although work is continuing to see if the net cost of the project can be reduced. This pressure is partially offset by the reduced borrowing requirement following the transfer of equipment purchases from capital to revenue previously reported. The borrowing requirement will be reflected in future capital financing forecasts, which will be factored into future iterations of the MTFP as appropriate.

## SCHOOLS BUDGET

12. At Month 5 the Dedicated Schools Grant position is reporting an in-year overspend of £12,656k against a budgeted overspend of £7,328k, representing a variance of £5,329k, with no movement reported from the Month 3 position. The Schools Block is reporting a pressure of £153k, with the High Needs Block reporting a £5,176k adverse variance, which represents no movement from Month 3.
13. The pressure in High Needs is due to a lack of capacity in borough, with the number of independent placements increasing since the budget was set. The budget for High Needs was increased for 2021/22 to take account of projected growth, but it is projected that the budget will be exceeded. When the £25,385k deficit brought forward from 2020/21 is taken into account, the cumulative deficit being carried forward to 2022/23 is forecast to be £38,042k. The Council is now involved in 'Safety valve' discussions with the DfE with the first meeting have been held in September 2021 and a follow up meeting set for October 2021. These discussions are aimed at resolving issues in relation to the ongoing pressures on the DSG budget. Significant work associated with these meetings is taking place and the outputs from this will be fed into future monitoring forecasts and the MTFP process.

## HOUSING REVENUE ACCOUNT

14. The Housing Revenue Account is currently forecasting a favourable variance of £70k compared to the budget, a net £21k favourable movement from Month 3, which is largely driven by variances in repairs and maintenance. The 2021/22 closing HRA General Balance is forecast to be £15,253k, and therefore remain in line with business plan assumptions.
15. A minor £13k underspend is reported on HRA Capital Investment, against a programme of £231,956k over the period 2021/22 to 2025/26 incorporating delivery of new housing and renewal of the existing estate. This position is unchanged from that reported at Month 3.



## FURTHER INFORMATION

## General Fund Revenue Budget

16. As noted above and presented in the table below, a £368k underspend is projected across the General Fund at Month 5, with the following section of this report providing further information on an exception basis. General Fund Balances are expected to total £26,469k at 31 March 2022 as a result of the forecast position detailed above, which remains broadly consistent with the forecast reported at Month 3. The Balances and Reserves Policy approved by Cabinet and Council in February 2021 outlined a recommended range of £15,000k to £35,000k for uncommitted General Balances.

Table 1: General Fund Overview

Service	Month 5		Variance (As at Month 5) £'000	Variance (As at Month 3) £'000	Movement from Month 3 £'000
	Approved Budget	Forecast Outturn			
	£'000	£'000			
Service Operating Budgets	210,169	224,062	160	165	(5)
Corporate Operating Budgets	8,475	7,795	(239)	(239)	0
Development & Risk Contingency	17,436	3,856	(289)	(287)	(2)
Unallocated Budget Items	2,165	2,164	0	0	0
<b>Sub-total Expenditure</b>	<b>238,245</b>	<b>237,877</b>	<b>(368)</b>	<b>(361)</b>	<b>(7)</b>
Corporate Funding	(235,824)	(235,824)	0	0	0
<b>Total Normal Activities</b>	<b>2,421</b>	<b>2,053</b>	<b>(368)</b>	<b>(361)</b>	<b>(7)</b>
Exceptional Items					
COVID-19 Pressures	0	18,777	18,777	16,641	2,136
COVID-19 Funding	0	(18,777)	(18,777)	(16,641)	(2,136)
<b>Total Net Expenditure</b>	<b>2,421</b>	<b>2,053</b>	<b>(368)</b>	<b>(361)</b>	<b>(7)</b>
Balances b/fwd	(28,522)	(28,522)			
<b>Balances c/fwd 31 March 2022</b>	<b>(26,101)</b>	<b>(26,469)</b>			

## Service Operating Budgets

17. Service Operating Budgets represent the majority of the Council's investment in day-to-day services for residents, with more volatile or demand-led areas of activity tracked separately through the Development and Risk Contingency. The impacts of COVID-19 are being reported discretely under Exceptional Items as detailed in Table 1, the position presented in Table 2 therefore represents the position reported against normal activities for the Service Operating Budgets. The salient risks and variances within this position summarised in the following paragraphs.

**Table 2: Service Operating Budgets**

Cabinet Member Portfolio		Approved Budget	Forecast Outturn	Variance (As at Month 5)	Variance (As at Month 3)	Movement from Month 3
		£'000	£'000	£'000	£'000	£'000
Property & Infrastructure	Expenditure	11,774	11,962	188	64	124
	Income	(5,296)	(5,490)	(194)	(63)	(131)
	<b>Sub-Total</b>	<b>6,478</b>	<b>6,472</b>	<b>(6)</b>	<b>1</b>	<b>(7)</b>
Finance	Expenditure	20,089	20,194	105	61	44
	Income	(3,369)	(3,493)	(124)	(79)	(45)
	<b>Sub-Total</b>	<b>16,720</b>	<b>16,701</b>	<b>(19)</b>	<b>(18)</b>	<b>(1)</b>
Public Safety and Transport	Expenditure	18,168	18,543	375	269	106
	Income	(16,241)	(16,658)	(417)	(309)	(108)
	<b>Sub-Total</b>	<b>1,927</b>	<b>1,885</b>	<b>(42)</b>	<b>(40)</b>	<b>(2)</b>
Corporate Services and Transformation	Expenditure	27,067	27,127	60	65	(5)
	Income	(1,604)	(1,665)	(61)	(69)	8
	<b>Sub-Total</b>	<b>25,463</b>	<b>25,462</b>	<b>(1)</b>	<b>(4)</b>	<b>3</b>
Environment, Housing & Regeneration	Expenditure	50,871	51,090	219	123	96
	Income	(20,642)	(20,993)	(351)	(240)	(111)
	<b>Sub-Total</b>	<b>30,229</b>	<b>30,097</b>	<b>(132)</b>	<b>(117)</b>	<b>(15)</b>
Families, Education and Wellbeing	Expenditure	26,004	26,419	415	449	(34)
	Income	(11,597)	(11,770)	(173)	(155)	(18)
	<b>Sub-Total</b>	<b>14,407</b>	<b>14,649</b>	<b>242</b>	<b>294</b>	<b>(52)</b>
Health and Social Care	Expenditure	165,066	165,181	115	51	64
	Income	(36,388)	(36,385)	3	(2)	5
	<b>Sub-Total</b>	<b>128,678</b>	<b>128,796</b>	<b>118</b>	<b>49</b>	<b>69</b>
<b>Total Service Operating Budgets</b>		<b>223,902</b>	<b>224,062</b>	<b>160</b>	<b>165</b>	<b>(5)</b>

18. Within the Council budget there is a Managed Vacancy Factor across the board of 4%, or £3,952k to reflect natural levels of turnover and resulting structural underspend in the workforce budgets. Current projections indicate that this will be delivered in full during 2021/22, with post-level establishment controls providing a key mechanism for managing workforce costs at the organisational level, although unanticipated turnover is expected to further improve this position over the coming months.
19. As noted in the previous monitoring report, and contrary to the Government policy of freezing the majority of public sector pay in 2021/22, an inflationary pay award of 1.5% was presented to unions for consideration and the Council earmarked £1,300k to meet this potential cost. This was rejected and subsequently increased to 1.75% by the employers' association, which if accepted would increase the cost by £700k. It is expected that the in-year impact of the increased pay award can be funded through the expected improvement in the workforce budget position, with the full cost being factored into future iterations of the MTF as appropriate.



20. As can be seen from the table above, the net £160k pressure across Service Operating Budgets represents the cumulative effect of a number of relatively minor variances which are briefly outlined below by Cabinet Portfolio:
- a. **Property & Infrastructure** – A net underspend of £6k, representing a £7k improvement on Month 3, with a £194k overachievement of income within the Repairs & Engineering Service, with a largely offsetting expenditure variance due to the activity undertaken to generate the income for this service.
  - b. **Finance** – A net underspend of £19k, an improvement of £1k on Month 3, with compensating variances on income and expenditure reflecting increased activity in support of non-General Fund functions, including the HRA regeneration projects.
  - c. **Public Safety and Transport** – a net underspend of £42k and £2k favourable movement from Month 3, with the increased grant funded activity and locally funded Environmental Health Officer capacity in respect of Brexit impacts on the trading standards and imported health functions, being offset by £125k underspends on staffing within the CCTV service.
  - d. **Corporate Services and Transformation** – a net underspend of £1k and £3k adverse movement from Month 3, with the underlying position reflecting increased recharge income within the ICT service and corresponding uplifts in expenditure.
  - e. **Environment, Housing and Regeneration** – an underspend of £132k, increased by £15k from Month 3, with a favourable outlook on planning and crematorium income being sufficient to more than mitigate the costs being incurred in insourcing an element of the planning service. The movement from Month 3 primarily relates to offsetting expenditure and income movements within Planning with additional income of £103k within this service area supporting additional non-developer funded costs.
  - f. **Families, Education and Wellbeing** – an overspend of £242k is reported as a result of additional demands on the service in respect of school place planning for both mainstream and special provision, alongside additional costs falling on the General Fund as a result of levels of demand for Education, Health and Care Plans. The favourable movement of £52k from Month 3 reflects the use of capitalisation powers against expenditure associated with the extended implementation of the SEND pathway alongside additional income driven by recharges to schools within this service area.
  - g. **Health and Social Care** – A net pressure of £118k is reported, with an adverse movement of £69k from the position at Month 3. The headline variance relates to increased demand on support for both adults and children, with the adverse movement stemming from increased staffing forecasts alongside increased spend on Section 17 preventative services within Children's Services.

## Transformation

21. The Council is permitted to finance the costs associated with service transformation from Capital Receipts, with both one-off implementation costs and the support for service transformation, including the BID team, being funded from this resource. Current projections include an estimate of £2,073k for such costs, which will remain under review throughout the year and have been excluded from the reported monitoring positions. It is anticipated that these costs will be financed from a combination of Capital Receipts and Earmarked Reserves. Although this position will be reviewed if capacity becomes available within the revenue position to fund such costs.

## Progress on Savings

22. The savings requirement for 2021/22 is £8,054k. In addition, there are savings of £2,362k brought forward from 2020/21, which gives an overall total of £10,416k reported below. The savings being reported as undelivered in 2020/21 (£2,362k) were directly attributable to the COVID-19 pandemic as the Council needed to redirect resources to manage the pandemic. The savings were linked to Leisure, Licencing, Digital Strategy and Fees and Charges. This value has been added to the budgeted savings agreed as part of the 2021/22 budget.

**Table 3: Savings Tracker**

Cabinet Member Portfolio	Blue Banked £'000	Green Delivery in progress £'000	Amber I Early stages of delivery £'000	Amber II Potential problems in delivery £'000	Red Serious problems in delivery £'000	Total £'000
Property & Infrastructure	(125)	(35)	(150)	0	0	(310)
Finance	(560)	0	(300)	0	0	(860)
Public Safety and Transport	(335)	(1,706)	(100)	0	0	(2,141)
Corporate Services and Transformation	(517)	(883)	0	0	0	(1,400)
Environment, Housing & Regeneration	(831)	(813)	(702)	0	0	(2,346)
Families, Education and Wellbeing	(250)	(109)	(364)	(986)	0	(1,709)
Health and Social Care	(250)	(250)	(1,150)	0	0	(1,650)
<b>Total 2021/22 Savings Programme</b>	<b>(2,868) 28%</b>	<b>(3,796) 36%</b>	<b>(2,766) 27%</b>	<b>(986) 9%</b>	<b>0 0%</b>	<b>(10,416) 100%</b>

23. As of Month 5 (August 2021) there are £2,868k savings already banked as delivered. As we approach the middle of the financial year 91% of the savings are reporting as either delivery in progress or in the early stages of delivery and these are on track and expected to progress throughout the year to be delivered in full. The savings in the early stages of delivery (Amber I) include the Licencing and Digital Strategy from the prior year, as well as current year savings including Social Care Placements, Review of Temporary Accommodation and Robotics & Automation, alongside other lower value savings included.
24. Currently there are £986k (9%) which are reporting there are potential problems in delivery (Amber II), which relates exclusively to the leisure management fee and reflects the particular impact of the COVID-19 pandemic on this sector, although in the medium term use of these services and associated income is expected to return to pre-pandemic levels and deliver this saving.





25. Where savings are at risk of not being delivered in full during 2021/22, the associated pressures have been factored into the monitoring position discussed above and offset through compensatory underspends or where appropriate use of COVID-19 grant funding. At this time, it is expected that all £10,416k will ultimately be delivered in full and therefore not impact upon future iterations of the Council's MTFF.

### **Corporate Operating Budgets**

26. Corporate Operating budgets are reporting a £239k underspend on capital financing and funding, in line with the position at Month 3. The underspend is driven by reduced capital financing costs arising from the favourable capital outturn position for 2020/21 and a minor improvement from a review of the Council's corporate subscriptions. No variance is reported on Corporate Funding, the exact level of grant funding for the year currently reflects the Cabinet and Council approved budgets in February 2021.

### **Development & Risk Contingency**

27. For 2021/22 £17,436k was set aside to manage uncertain elements of budgets within the Development & Risk Contingency, which included £16,613k in relation to specific risk items and £823k as General Contingency to manage unforeseen issues. Following Cabinet on 2 September, £13,291k of this funding was released into the Council's Service Operating Budgets on the basis that these values were no longer contingent, leaving £4,145k being held for specific risk items alongside the £823k of General Contingency. Exceptional COVID-19 related pressures are being funded through specific grant funding and commented on later in this report.
28. At Month 5, a net underspend of £289k is reported on Development and Risk Contingency, with £222k linked to a greater share of homelessness costs being met through new burdens funding rather than the Council's own resources and the residual £65k relates to minor movements in the cost of Social Care placements not linked to the COVID-19 pandemic. There are currently no calls on the £823k General Contingency, providing a mechanism to manage emerging non-COVID-19-related risks over the remainder of the financial year.



## Exceptional Items – COVID-19 Pressures

**Table 4: COVID-19 Pressure Breakdown**

Service	Month 5		Variance (As at Month 5) £'000	Variance (As at Month 3) £'000	Movement from Month 3 £'000
	Approved Budget	Forecast Outturn			
	£'000	£'000			
Social Care	0	10,536	10,536	8,962	1,574
Other Expenditure	0	4,220	4,220	4,186	34
Income	0	4,021	4,021	3,493	528
<b>Total Exceptional Items</b>	<b>0</b>	<b>18,777</b>	<b>18,777</b>	<b>16,641</b>	<b>2,136</b>

29. The majority of the COVID-19 pressure is relating to Health and Social Care £10,536k, Public Safety and Transport £2,613k and Environment, Housing and Regeneration £2,355k, these three areas represent £15,504k of the £18,777k in-year pressure.
- a. Within Health and Social Care, the Council is forecasting a pressure of just over £10.5m, driven by £9.8m of pressures associated with direct care provision, with £6m of this value falling on Adult Social Care and £3.8m falling in Children's Social Care. In addition, both areas are seeing workforce pressures associated with the additional demand and the Council's COVID-19 response, adding a further £0.7m, with the remaining balance coming from a combination of smaller areas. The movement in this area from Month 3 relates to the Government increasing flexibility for specific COVID-19 grant funding which has allowed the Council to maximise grant funding as opposed to the previously reported position whereby these pressures were being covered by Earmarked Reserves.
  - b. Within Environment, Housing and Regeneration £1.1m of pressures have been identified associated with lost income, with the single largest area affected being Planning & Development. In addition, £0.4m is forecast to support the homeless during the pandemic, with a further £0.4m being required to support the impact on the Council's Waste Service. Half of the movement in this area from Month 3 is being driven by additional pressures within the Waste Service area, with the other half being spread across a number of services, including cultural and leisure services and compliance and enforcement activities.
  - c. Public Safety and Transport is a forecast decline in Fees and Charges income of £2.3m, the majority of this pressure relates to parking charges making up approximately £1.9m of this value.
  - d. The remaining balance is spread across a number of service areas and income streams impacted by the pandemic, including sports and cultural services and commercial income associated with rental income from areas such as Council owned garages. While income pressures have increased by £528k since month 3, a material amount of this increase is being covered by grant following a detailed review of the Council's claim on the specific Sales, Fees & Charges grant.
30. Included within this position is a forecast assumption that the overall pressure caused by COVID-19 will be funded by Central Government and other funding strategies. The Council has confirmed funding of £21,029k, including carried forward grants from 2020/21 (although the final figure will in part be based on actual income losses and may therefore fluctuate)



which will be sufficient to manage pressures identified to date, although there remains a risk that new and emerging issues will leave a funding gap in either the current or future years.

31. The strategy to deal with any unfunded COVID-19 costs is to utilise Earmarked Reserves totalling £10,216k. The Council's budget strategy included a release of £3,876k from this balance to offset the medium-term pressures impacting on retained Business Rates from the pandemic, with the £6,250k residual balance available to manage emerging or continuing pressures.

### **Collection Fund**

32. A deficit of £396k is reported within the Collection Fund relating to an adverse position reported within Council Tax of £780k, offset by a favourable position within Business Rates of £384k. The pressure in Council Tax is predominantly driven by a reduction in the forecast growth of the taxbase, offset by a favourable position within Council Tax Support as the economy begins to recover from the pandemic and demand in this area reduces. The Business Rates position is primarily driven a favourable position against the Council's rating list compared the budget, with the pandemic having a reduced impact on local businesses than budgeted for in February 2021.
33. Any deficits within the Collection Fund impact on the Council's future year budgets, this position would therefore add £396k to the Council's gross saving requirement above the level set in the Council's budget strategy agreed at February 2021 Cabinet. However, given that this pressure continues to be driven by COVID-19, there may be scope to utilise an element of the COVID-19 Earmarked Reserves or any residual grant balance to meet this cost.

### **General Fund Capital Programme**

34. As at Month 5 an under spend of £30,760k is reported on the 2021/22 General Fund Capital Programme of £102,937k, due mainly to re-phasing of project expenditure into future years. The forecast outturn variance over the life of the 2021/22 to 2025/26 programme is an overspend of £752k. General Fund Capital Receipts of £8,921k are forecast for 2021/22, and expected to achieve the budgeted target of £57,977k over five years to 2025/26. Overall, Prudential Borrowing required to support the 2021/22 to 2025/26 capital programmes is forecast to be above budget by £2,129k.

### **Capital Programme Overview**

35. Table 5 below sets out the latest forecast outturn on General Fund capital projects. Forecasts for future years include capital projects and programmes of work approved by Cabinet and Council in February 2021.

**Table 5: General Fund Capital Programme Summary**

	Approved Budget 2021/22	Forecast 2021/22	Cost Variance 2021/22	Project Re-phasing 2021/22	Total Project Budget 2021-2026	Total Project Forecast 2021-2026	Total Project Variance 2021-2026	Move-ment
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
<b>Cabinet Member Portfolio</b>								
Finance	4,433	3,991	(612)	170	10,298	7,238	(3,060)	-
Public Safety and Transport	16,871	13,984	(1,878)	(1,009)	56,432	54,554	(1,878)	(1,007)
Corporate Services & Transformation	1,572	1,358	(114)	(100)	5,828	5,258	(570)	-
Environment, Housing & Regeneration	4,763	4,053	(27)	(683)	10,548	10,521	(27)	(27)
Families, Education and Wellbeing	7,894	10,232	-	2,338	20,469	20,469	-	-
Health and Social Care	2,359	2,359	-	-	11,795	11,795	-	-
Property and Infrastructure	63,628	34,783	(787)	(28,058)	174,773	181,060	6,287	724
General Contingency	1,417	1,417	-	-	7,417	7,417	-	-
<b>Total Capital Programme</b>	<b>102,937</b>	<b>72,177</b>	<b>(3,418)</b>	<b>(27,342)</b>	<b>297,560</b>	<b>298,312</b>	<b>752</b>	<b>(310)</b>
Major Projects	58,094	34,218	250	(24,126)	154,387	161,711	7,324	1,761
Programme of Works	43,426	36,542	(3,668)	(3,216)	135,756	129,184	(6,572)	(2,071)
General Contingency	1,417	1,417	-	-	7,417	7,417	-	-
<b>Total Capital Programme</b>	<b>102,937</b>	<b>72,177</b>	<b>(3,418)</b>	<b>(27,342)</b>	<b>297,560</b>	<b>298,312</b>	<b>752</b>	<b>(310)</b>
Movement	93	(7,036)	(1,821)	(5,308)	93	(217)	(310)	

36. **Finance:** The overall under spend of £3,060k under this portfolio arises from no longer financing small equipment and furniture expenditure from capital resources, with budgets provided in revenue to support this.
37. **Public Safety and Transport:** An under recovery of £1,878k is forecast on Transport for London (TFL) grant funding, a movement of £1,007k as it is expected that the 2021/22 LIP funding award for the remainder of the year will be significantly lower than bid for and original budget assumptions. TFL funding remains significantly affected by reduced travel due to the pandemic with increased home working.
38. **Families, Education and Wellbeing:** Forecast expenditure for the year has increased as the budgeted £6m payment to the Department for Education as contribution to the rebuild and expansion of Harlington School is expected to be made in full this financial year, rather than in staged payments.
39. **Property and Infrastructure:** Following receipt of tenders for the construction of a new leisure centre in West Drayton, a forecast over spend of £5,574k on Council resources is reported based on the tender prices being significantly higher than pre-tender estimates. This is an increase of £441k from Month 3 due to reinstating structural warranty into the contract sum. A forecast over spend of £250k is reported on the works to extend the Uxbridge mortuary, as additional cost items have been uncovered on site including deeper works required on the foundations. Disabled Facilities Grants are forecast to under spend by £1,037k based on expected demand, with higher activity this year on adaptations in the HRA sector.

## Capital Financing - General Fund

**Table 6: Capital Financing**

	Approved Budget 2021/22 £'000	Forecast 2021/22 £'000	Cost Variance £'000	Phasing Variance £'000	Total Financing Budget 2021-2026 £'000	Total Financing Forecast 2021-2026 £'000	Total Variance £'000	Move-ment
<b>Source of Finance</b>								
Capital Receipts	16,749	8,921		(7,828)	57,977	57,977	-	-
CIL	3,500	5,500		2,000	17,500	17,500	-	-
Prudential Borrowing	55,481	38,515	(541)	(16,425)	131,018	133,147	2,129	256
<b>Total Council Resources</b>	<b>75,730</b>	<b>52,936</b>	<b>(541)</b>	<b>(22,253)</b>	<b>206,495</b>	<b>208,624</b>	<b>2,129</b>	<b>256</b>
Grants & Contributions	27,207	19,241	(2,877)	(5,089)	91,065	89,688	(1,377)	(566)
<b>Capital Programme</b>	<b>102,937</b>	<b>72,177</b>	<b>(3,418)</b>	<b>(27,342)</b>	<b>297,560</b>	<b>298,312</b>	<b>752</b>	<b>(310)</b>
Movement	93	(7,036)	(1,821)	(5,308)	93	(217)	(310)	

40. Capital receipts before transformation financing in 2021/22 include £1,339k in sales already achieved with several more sites planned to be sold via auction by the end of the financial year. The phasing variance of £7,828k is mainly due to major disposal sites that are not expected to be completed this financial year.
41. As at the end of August 2021, a total of £3,560k Community Infrastructure Levy receipts have been invoiced. Forecast receipts for this financial year are a favourable variance of £2,000k as developer activity is increasing as the pandemic recedes, and several sizable developments are expected to be invoiced in 2021/22. The longer-term forecast for this income stream will remain under review as the economy recovers from the pandemic.
42. Forecast grants and contributions are £1,377k lower than the revised budget, due partly to the forecast under recovery of the 2021/22 TFL LIP grant compared to the original budget, which was based on pre-pandemic funding levels.
43. Prudential Borrowing is forecasting to be within budget by £16,966k in 2021/22 due mainly to forecast re-phasing of project expenditure into future years. The medium-term forecast is an adverse variance of £2,129k due mainly to the over spend on Yiewsley/West Drayton leisure centre, partly offset by the under spend on capitalised general equipment expenditure.



## Schools Budget

44. The Dedicated Schools Grant (DSG) monitoring position is an in-year overspend of £12,657k at month 5, this is an increase of £5,329k on the budgeted deficit of £7,328k. This overspend is due to ongoing pressures in the cost of High Needs placements, where due to a lack of capacity in borough, the number of independent placements has increased since the budget was set. In addition, the local authority is increasingly seeing an uplift in the funding allocated to SEN placements due to a change in the level of need. The budget for High Needs was increased for 2021/22 to take account of projected growth, but it is projected that the budget will be significantly exceeded. When the £25,385k deficit brought forward from 2020/21 is taken into account, the cumulative deficit carry forward to 2022/23 is £38,042k.

**Table 7: DSG Income and Expenditure 2021/22**

Funding Block	Month 5		Variance		
	Revised Budget £'000	Forecast Outturn £'000	Variance (As at Month 5) £'000	Variance (As at Month 3) £'000	Change from Month 3 £'000
<b>Dedicated Schools Grant Income</b>	(317,131)	(317,131)	0	0	0
<b>Schools Block</b>	247,506	247,659	153	153	0
<b>Early Years Block</b>	25,997	25,997	0	0	0
<b>Central Schools Services Block</b>	3,296	3,296	0	0	0
<b>High Needs Block</b>	47,660	52,836	5,176	5,176	0
<b>Total Funding Blocks</b>	<b>7,328</b>	<b>12,657</b>	<b>5,329</b>	<b>5,329</b>	<b>0</b>
Balance Brought Forward 1 April 2021	25,358	25,358			
<b>Balance Carried Forward 31 March 2022</b>	<b>32,686</b>	<b>38,015</b>			

### **Dedicated Schools Grant Income (nil variance, no change)**

45. The Early Years block will be adjusted further to reflect actual numbers accessing the free entitlement in the Spring term. If attendance rises after the January census, the DfE has confirmed that funding will be increased, up to 85% of the January 2020 census level, where a local authority can provide evidence of increased attendance during the Spring term. Adjustments will be calculated by using an average of the January 2021 census and the May 2021 count. That is, January 2021 count will be used to represent attendance for the first half of Spring term, and the May 2021 count to represent the latter half and recognise any increase in attendance to determine the final spring term top up.
46. There will be an adjustment to the Schools Block to reflect the amount recouped by the Education Skills Funding Agency (ESFA) to fund academy schools directly. This follows the academy conversion of two schools in Hillingdon on 1<sup>st</sup> September 2021.

### **Schools Block (£153k overspend, no change)**

47. The Schools Block includes all funding paid directly to mainstream schools as part of their delegated budget share, including the funding recouped by the ESFA and paid to mainstream academies.



48. There is also a growth contingency fund which is funded from the Schools Block. Schools that are expanding, in agreement with the local authority, to meet basic need pupil population growth, receive additional funding to provide financial recompense throughout the relevant financial year to cover the cost of this agreed and planned growth.
49. Schools Forum took the decision to withhold growth contingency allocations for two schools due to insufficient projected pupil growth in September 2022 and therefore there will be an underspend relating to this allocation. Additionally, Schools Forum have agreed to backdate growth contingency to 2018/19 for one secondary school which it has been retrospectively decided met the criteria for funding. This has resulted in the overspend on the Schools block in 2021/22 which, because the Schools Block is ring-fenced, will need to be carried forward to the following financial year and included in the Growth Fund determination for 2022/23.
50. The growth contingency policy was amended prior to 2020/21 in order address the growth in secondary pupils. Schools will be funded for any Year 7 pupils which are above the Published Admission Number (PAN). £525k was set aside for this purpose, with the actual funding requirement considerably lower, which has off-set the overall overspend on the Schools block.
51. The growth contingency also funds diseconomies of scale funding for new basic need academy schools and a calculation method has now been determined for this for the two remaining years that the final basic need school is still growing. An amendment to the Growth Contingency Policy has been drafted to reflect this change for Schools Forum members to discuss at the September Schools Forum meeting.

#### **Early Years Block (no variance, no change)**

52. Two-year-old funding will be adjusted to reflect the number of children accessing the entitlement based on the May 2021 census.
53. The 3 and 4-year-old funding for both the universal and the additional free entitlement will also be adjusted following verification of the actual numbers recorded in the May 2021 census. This is likely to result in a reduction in the overall Early Years block funding allocation as the number of children accessing the additional free entitlement has decreased significantly over the past year. The projections will be revised once the full impact of the funding adjustments is known.

#### **Central School Services Block (no variance, no change)**

54. The published DSG budget allocations confirmed a 20% decrease in the Central School Services Block provided for historic commitments. This resulted in a £265k reduction in funding, though this was partly offset by £51k of additional funding for pupil growth. This reduction in funding resulted in a budget shortfall for the services funded by the Central School Services block adding to the pressure which has led to an overall deficit DSG being agreed for 2021/22.



## High Needs Block (£5,176k overspend, no change)

55. There continues to be significant pressure in the High Needs Block in 2021/22, with an overspend of £5,176k being projected at month 5. The growth in the requirement to place pupils with an EHCP in independent placements due to a continuing lack of capacity in-borough and across other local authority provision continues. There is an expectation that this will become the only route that the Council will be able to take until more provision is created locally. Much of the overspend being projected is a result of additional placements already made for September 2021, along with an anticipated further increase in the number of placements throughout the remainder of the year. Whilst an element of growth in placements has been built into the projection, there may be further pressure dependent on where future placements are made.
56. There is further pressure being added to the High Needs block because of an uplift in the funding allocated to SEN placements due to a change in the level of need. The local authority is regularly seeing an increase in the complexity of need at the point of annual review which is resulting in agreement to increase the top-up funding allocation to ensure needs are being adequately met. This is contributing to the overspend being projected and there may be additional pressure in relation to this as and when further annual reviews are completed.
57. There are in-borough special schools which are currently over their commissioned place number with a requirement on the local authority to allocate more funding for these additional places. The commissioned numbers were updated at the start of the financial year, however due to changes not taking place until the start of the next academic year for academy schools, along with schools agreeing to take further additional pupils there will be a requirement to fund places over commissioned numbers.
58. The Council is now involved in 'Safety valve' discussions with the DfE with the first meeting have been held in September 2021 and a follow up meeting set for October 2021. These discussions are aimed at resolving issues in relation to the ongoing pressures on the DSG budget and the High Needs Block in particular. Significant work associated with these meetings is taking place and the outputs from this will be fed into future monitoring forecasts and the MTFP process.





## Housing Revenue Account

59. The Housing Revenue Account (HRA) is currently forecasting a favourable variance of £70k compared to the budget and a favourable movement of £21k on Month 3. This excludes the potential cost pressures of COVID-19, which are estimated at £181k. The 2021/22 closing HRA General Balance is forecast to be £15,253k. The use of reserves is funding investment in new housing stock. The table below presents key variances by service area.

**Table 8: Housing Revenue Account**

Service	Month 5		Variance (+ adv / - fav)		
	Revised Budget	Forecast Outturn	Variance (As at Month 5)	Variance (As at Month 3)	Movement from Month 3
	£'000	£'000	£'000	£'000	£'000
Rent Income	(58,944)	(58,685)	259	0	259
Other Income	(5,528)	(5,467)	61	(47)	108
<b>Net Income</b>	<b>(64,472)</b>	<b>(64,152)</b>	<b>320</b>	<b>(47)</b>	<b>367</b>
Housing Management	15,203	15,382	179	144	35
Tenant Services	3,953	3,923	(30)	(3)	(27)
Repairs	5,654	6,170	516	512	4
Planned Maintenance	4,014	2,959	(1,055)	(655)	(400)
Capital Programme Funding	19,021	19,021	0	0	0
Interest & Investment Income	15,385	15,385	0	0	0
Development & Risk Contingency	1,260	1,260	0	0	0
<b>Operating Costs</b>	<b>64,490</b>	<b>64,100</b>	<b>(390)</b>	<b>(2)</b>	<b>(388)</b>
<b>(Surplus) / Deficit</b>	<b>18</b>	<b>(52)</b>	<b>(70)</b>	<b>(49)</b>	<b>(21)</b>
General Balance 01/04/2021	(15,201)	(15,201)	0	0	0
<b>General Balance 31/03/2022</b>	<b>(15,183)</b>	<b>(15,253)</b>	<b>(70)</b>	<b>(49)</b>	<b>(21)</b>

60. As at Month 5, the rental income is forecast to under-recover by £259k. Other income is forecast to under-recover by £61k, an adverse movement on Month 3 of £108k. Both forecasts have been updated to take account actual performance for the first 5 months of the year. This has seen a high level of voids, with an average of 1.7%, compared to a budgeted assumption of 1%. A range of management action is being undertaken to improve the position with the forecasts assuming an improved performance over the remainder of the financial year. This includes re-letting of Packet Boat House following expected completion of remedial works at the end of September, and additional income from buy back properties, decants and new builds.
61. The number of Right-To-Buy (RTB) applications received in the first five months of 2021/22 was 79 compared to 55 for the same period in 2020/21. There has been 15 RTB completions in the first five months of 2021/22 compared to 16 for the same period in 2020/21. The RTB applications submitted, offers made to tenants and sales are being kept under review during the year. As at Month 5, the 2021/22 RTB sales forecast remains at 50, in line with the budget.

62. The housing management service is forecast to overspend by £179k as at Month 5 which is an adverse movement of £35k on Month 3. This includes an increase in the forecast spend of £28k on COVID-19 related domestic violence related costs and a net increase in forecast spend on staffing of £7k.
63. Tenant services is forecast to underspend by £30k, a favourable movement of £27k on Month 3 relating to reduction in forecast spend on caretaking staff.
64. The repairs and planned maintenance budget totals £9,668k and as at Month 5 it is forecast to underspend by £539k, a net favourable movement of £396k on Month 3. This includes a minor £4k adverse movement on the repairs team running costs. There are favourable movements of £250k on external decorations due to re-phasing of the programme, and £150k on the service contracts due to the benefits of the investment in the capital works to stock planned programme. The repairs budgets, especially voids and reactive works, will be kept under review for potential pressures including demand, cost, and disrepair cases.
65. As at Month 5 the capital programme funding, interest and investment income, and the development and risk contingency budgets are forecast to breakeven.

### COVID-19 cost pressures on the HRA

66. HRA COVID-19 cost pressures identified to date and will be kept under review during the year. These pressures have not been included in the Month 5 forecast position for HRA revenue and currently total £181k.

### HRA Capital Expenditure

67. The HRA capital programme is set out in the table below. The 2021/22 revised budget is £91,774k and forecast expenditure is £74,217k with a net variance of £17,557k of which £17,544k is due to re-phasing and £13k due to cost under spends. A summary position is included in Table 9 below.

**Table 9: HRA Capital Expenditure**

	Approved Budget 2021/22	Forecast 2021/22	Cost Variance 2021/22	Project Re-Phasing 2021/22	Total Project Budget 2021-26	Total Project Forecast 2021-26	Total Project Variance 2021-26	Movement 2021-26
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
<b>Cabinet Member Portfolio</b>								
Property and Infrastructure	91,774	74,217	(13)	(17,544)	231,956	231,943	(13)	0
<b>Total HRA Capital Programme</b>	<b>91,774</b>	<b>74,217</b>	<b>(13)</b>	<b>(17,544)</b>	<b>231,956</b>	<b>231,943</b>	<b>(13)</b>	<b>0</b>

68. There is forecast re-phasing of £17,544k due mainly to several major projects remaining in early stages and expected to complete in future years.
69. Following a re-tendering process, works are recommencing on site to complete the six-unit general needs housing development at Nelson Road, with construction works forecast to be completed in early 2022. Groundworks have started on the 5x3 bedroom shared ownership development at Moorfield Road, Cowley.



70. A cost under spend of £13k is forecast on the acquisition of flats at Abrook Court, 191 Harefield Road, Uxbridge with completion payment settled.
71. Following Cabinet approval, works on the regeneration of Hayes housing estates have commenced with £20,526k funding programmed in 2021/22 for scheme design (£3,743k) and leaseholder buy backs (£16,783k). This is forecast to be fully spent at this early stage.
72. A total budget of £2,300k is allocated for the buy-back of properties at Packet Boat House. An amount of £1,099k has recently been approved for the acquisition of eight flats from this budget.
73. The Works to Stock programme 2021/22 budget has increased by £2,920k following Cabinet approval to re-profile funding forward from future years to accelerate electrical fire safety works. The Works to Stock programme includes various workstreams, with works ongoing at numerous sites and future phases of works on some programmes being tendered. Remedial works at Packet Boat House are nearing completion and are expected to be complete by the end of September 2021.
74. Works are in progress for delivery of the re-phased remaining £3,650k Green Homes Grant Local Authority grant scheme to provide energy efficiency upgrades to low-income homes.
75. Disabled Facilities Grants are forecast to overspend based on expected demand, with higher activity this year on adaptations in the HRA sector, with this position being offset by grant funding and therefore having a net nil impact.



76. Treasury Management Update as at 31 August 2021

**Table 10: Outstanding Deposits – Average Rate of Return 0.02%**

Period	Actual (£m)	Actual (%)	Benchmark (%)
Call Accounts and MMF's*	36.4	56.70	
Up to 1 Month Fixed-Term Deposits	12.8	19.94	70.00
<b>Total</b>	<b>49.2</b>	<b>76.64</b>	<b>70.00</b>
Strategic Pooled Funds	15.0	23.36	30.00
<b>Total</b>	<b>64.2</b>	<b>100.00</b>	<b>100.00</b>

\*Money Market Funds

77. Deposits are held with UK institutions, all of which hold a minimum A- Fitch (or lowest equivalent) long-term credit rating and AAA rated Money Market funds. UK deposits are currently held in NatWest Bank plc, Santander UK plc and the DMADF. There is also an allocation to Strategic Pooled Funds.
78. The average rate of return on day-to-day operational treasury balances is 0.02%. As part of the Council's investment strategy for 21/22, the Council continues to hold a total of £15m in three long-dated strategic pooled funds (£5m in each). The strategic pooled funds have a 3-5 year investment horizon with dividends being distributed periodically.
79. The Council aims to minimise its exposure to bail-in risk by utilising bail-in exempt instruments and institutions whenever possible. However, due to the significant amount held in instant access facilities, which is needed to manage daily cashflow, it is not possible to fully protect Council funds from bail-in risk. At the end of August, 74% of the Council's day-to-day operational treasury investments had exposure to bail-in risk compared to a June benchmark average of 67% in the Local Authority sector (latest benchmark provided quarterly by the Council's treasury advisors Arlingclose). The Council's exposure reduces to 0% once instant access facilities are excluded from the total bail-in percentage.
80. Liquidity was maintained throughout August by placing surplus funds in instant access accounts and making short-term deposits with the DMADF. Cash-flow was managed by ensuring deposit maturities with the DMADF were matched to outflows and where required, funds were withdrawn from instant access facilities. In addition, £10m of forward dated temporary borrowing reached settlement. Cash balances have remained above minimum levels due to the balances of COVID-19 grants being held by the Council before repayment.



**Table 11: Outstanding Debt - Average Interest Rate on Debt: 3.25%**  
**Average Interest Rate on Temporary Borrowing: 0.51%**

	<b>Actual (£m)</b>	<b>Actual (%)</b>
<b>General Fund</b>		
PWLB	43.93	14.31
Long-Term Market	15.00	4.88
Temporary	80.00	26.06
<b>HRA</b>		
PWLB	135.07	44.00
Long-Term Market	33.00	10.75
<b>Total</b>	<b>307.00</b>	<b>100.00</b>

81. During August there were no scheduled PWLB or Market debt repayments, however, £15m of temporary borrowing reached maturity. Gilt yields moved down during the first half of the month, however ended the month slightly higher than it began. With the Council's long-term borrowing need and with restrictive premiums, early repayment of debt remains unfeasible.
82. There were no breaches of the Prudential Indicators or non-compliance with the Treasury Management Policy and Practices.
83. To maintain liquidity for day-to-day business operations during September, cash balances will be placed in instant access accounts and short-term deposits.

## PART B: FINANCIAL RECOMMENDATIONS

### That the Cabinet:

- a. Note those consultancy and agency assignments over £50k approved under delegated authority between the September 2021 and October 2021 Cabinet meetings, detailed at Appendix A.
- b. Approve the acceptance of the Private Rented Sector Minimum Energy Efficiency Standards Grant of £98,728 from the Midlands Energy Hub. The grant is part of the Private Rented Sector (PRS) Compliance and Enforcement Competition originating from the Secretary of State for Business, Energy and Industrial Strategy (“BEIS”).
- c. Approve virements totalling £5,574k comprising £3,060k from the 2021-26 General Equipment Capitalisation budget, £570k from the 2021-26 ICT Equipment Capitalisation budget and £1,944k from the 2021-26 General Capital Contingency budget to the new Yiewsley/West Drayton leisure centre project.
- d. Accept grant funding of £1,500k to be allocated to the new Yiewsley/West Drayton Leisure Centre budget.
- e. Accept a capital grant award of £2,675k and a revenue grant of £129k from the Greater London Authority in respect of the Rough Sleeping Accommodation Programme (RSAP).
- f. Approve a virement of £2,675k from the HRA Acquisitions and Internal Developments budget to the Rough Sleepers Accommodation Programme, as Council match funding.
- g. Note Transport for London grant funding awards of £356k in respect of LIPs Corridors (£146k), Crossrail Complementary Measures (£60k), Bus Priority Measures (£132k) and Cycle Training (£18k).
- h. Approve acceptance of gift funding in relation to a Planning Performance Agreement in accordance with the provisions of Section 93 of the Local Government Act 2003 for;
  - a. Unit 1 Nestle - £10,000
  - b. Crown Trading - £40,000

### Reasons for recommendation

84. **Recommendation 2a** notes consultancy and agency assignments approved by the Chief Executive under authority granted by Council on 20 May 2021. Appendix A reports back on use of this delegated authority since the previous Cabinet meeting.
85. **Recommendation 2b** The Council is committed to reducing fuel poverty and encourage energy efficiency for residents. This is underpinned by Hillingdon's Climate Change Strategy and ongoing support to residents through Public Protection Initiatives. The grant receipt from the secretary of State for Business, Energy and Industrial Strategy will be used to tackle rogue landlords who do not comply with Private Rental Sector Minimum Energy Efficiency Standard (MEES) regulations. The funding will be used to ‘pump prime’ this workstream and set up a robust framework to sustain enforcement longer term. It will be used to encourage landlords to comply with the above legislation and where this is not possible to carry out enforcement.



86. **Recommendation 2c & 2d** Following receipt of tenders for the construction of the new leisure centre in West Drayton, and after an extensive value engineering exercise, the project budget is required to be increased by £7,074k. It is proposed that this increase is met by viring £3,630k uncommitted funding from the former general and ICT equipment capitalisation budgets 2021-26, and £1,944k from the general capital contingency budget 2021-26, with the remainder of £1,500k to be met from additional sources of external grant funding expected to be secured.
87. **Recommendation 2e** The GLA have confirmed a recent bid for Rough Sleepers Accommodation Programme (RSAP) funding has been successful. The capital grant of £2,675k is for the acquisition of 20 self-contained dispersed properties to provide move on accommodation for former rough sleepers, representing 50% of the total cost, with match funding to be provided by the Council within the HRA capital programme. The £129k revenue grant will cover the costs of a dedicated Tenancy Management Officer within the council's established Housing Management Service, who will support tenants in regard to daily living skills, wellbeing and inclusion. The funding will cover employment up to the end of March 2024.
88. **Recommendation 2f** The Rough Sleeper Accommodation Programme is to be 50% match funded by the Council. The total cost is £5,350k based on 20 properties at an average purchase price of £250k each, with a further £10k included for any void and repair works necessary to bring the properties up to the required standard and £7.5k per property for stamp duty. The GLA grant will meet half of these costs with the other half to be funded from the HRA Acquisitions and Developments capital budget.
89. **Recommendation 2g** Transport for London have recently confirmed an allocation of £338k to London Borough of Hillingdon from £100m London wide funding following their latest funding settlement. The funding must be committed to projects and programmes by 11 December 2021. In addition, £18k has been awarded for cycle training from a London wide allocation of £576k for the quarter October to December 2021.
90. Gift funding has been offered by developers which if accepted by Cabinet will be utilised to fund dedicated staff to support this pre-application and application work. **Recommendation 2h** seeks authority from Cabinet to approve the acceptance of £50,000k in relation to two major developments.
- a. Unit 1 Nestle - £10,000
  - b. Crown Trading - £40,000

### **Alternative options considered / risk management**

91. There are no other options proposed for consideration.

## PART B: APPENDIX A

### Consultancy and agency assignments over £50k approved under delegated authority

92. The following Agency staff costing over £50k have been approved under delegated powers by the Chief Executive and are reported here for information.

**Table 12: Consultancy and agency assignments**

\*The size of the consultancy firm supplying the agency staff

Post Title	Original Start Date	Approved From	Proposed End Date	Previous Approval £'000	Approved £'000	Total £'000	Consultancy Size*
<b>Finance</b>							
Finance Business Partner	09/11/2020	01/08/2021	19/12/2021	97	51	148	Large
Finance Business Partner	03/02/2020	03/08/2021	01/02/2022	190	82	272	Large
FBP - Children's Social Care	09/03/2021	14/09/2021	15/03/2022	143	82	225	Large
Pensions Accountant	30/12/2019	16/09/2021	31/12/2021	285	53	338	Large
<b>Environment, Education &amp; Community Services</b>							
Homeless Resettlement Officers x2	02/08/2021	02/08/2021	03/04/2022	60	60	60	Large
Homeless PRS Floating Officers x3	02/08/2021	02/08/2021	03/04/2022	90	90	90	Large
Virtual School Officer	15/04/2019	02/08/2021	17/12/2021	104	17	121	Large
3 x Housing Options & Homeless Prevention	24/05/2019	12/07/2021	19/09/2021	345	31	376	Large
<b>Infrastructure, Building Services &amp; Transport</b>							
Project Manager, Hayes Dev	04/05/2020	01/09/2021	31/12/2021	233	58	291	Large



STRICTLY NOT FOR PUBLICATION

Exempt information by virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972 (as amended).

# Agenda Item 14

Document is Restricted

This page is intentionally left blank

STRICTLY NOT FOR PUBLICATION

Exempt information by virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972 (as amended).

# Agenda Item 15

Document is Restricted

This page is intentionally left blank

STRICTLY NOT FOR PUBLICATION

Exempt information by virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972 (as amended).

# Agenda Item 16

Document is Restricted

This page is intentionally left blank

STRICTLY NOT FOR PUBLICATION

Exempt information by virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972 (as amended).

# Agenda Item 17

Document is Restricted

This page is intentionally left blank



STRICTLY NOT FOR PUBLICATION

Exempt information by virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972 (as amended).

Document is Restricted

This page is intentionally left blank