



HILLINGDON
LONDON



CABINET

To all Members of the Cabinet:

Date: THURSDAY, 1 SEPTEMBER
2022

Ian Edwards, Leader of the Council
(Chairman)

Time: 7.00 PM

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

Venue: COMMITTEE ROOM 6 -
CIVIC CENTRE, HIGH
STREET, UXBRIDGE UB8
1UW

Martin Goddard, Cabinet Member for
Finance

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

Douglas Mills, Cabinet Member for
Corporate Services

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

Susan O'Brien, Cabinet Member for
Children, Families & Education

Jane Palmer, Cabinet Member for Health
& Social Care

Eddie Lavery, Cabinet Member for
Residents' Services

You can view the agenda
at www.hillingdon.gov.uk or use a smart
phone camera and scan the code below:



Published:

Tuesday, 23 August 2022

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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:

1 September 2022 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

23 August 2022
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 Strategic Climate Action Plan Progress Update & Climate Commitment Charter (Cllr Eddie Lavery) 13 - 52
- 6 Outcome of the consultation on the Successful, Sustainable, Viable Schools: Infant & Junior Amalgamation Policy (Cllr Susan O'Brien) 53 - 92
- 7 POLICY FRAMEWORK: Review of Statement of Gambling Policy (Cllr Eddie Lavery) 93 - 168
- 8 Statutory Proposal for a Specialist Nursery Assessment Base and Autistic Spectrum Disorder provision at Ruislip Gardens Primary School (Cllr Susan O'Brien) * 169 - 186
- 9 Monthly Council Budget Monitoring Report: Month 3 (Cllr Martin Goddard)
REPORT TO FOLLOW
- 10 Public Preview of matters to be considered in private 187 - 194

Cabinet Reports - Part 2 (Private and Not for Publication)

- | | | |
|-----------|---|-----------|
| 11 | Framework for Home Care and Outreach Services (Cllr Jane Palmer and Cllr Susan O'Brien) | 195 - 206 |
| 12 | Children's Advocacy and Independent Visitor Service (Cllr Susan O'Brien) | 207 - 214 |
| 13 | Provision of a Tree Maintenance Service (Cllr Eddie Lavery) | 215 - 226 |
| 14 | Bed-based intermediate care service contracts (Cllr Jane Palmer) * | 227 - 238 |
| 15 | The Council's Workflow and Document Management System (Cllr Douglas Mills) * | 239 - 246 |
| 16 | Water Quality Services Contract (Cllr Jonathan Bianco) | 247 - 256 |

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.

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

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Minutes

CABINET

Thursday, 7 July 2022

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



Decisions published on: 8 July 2022

Decisions come into effect from 5pm, Friday 15 July 2022

Cabinet Members Present:

Ian Edwards (Chairman)
Jonathan Bianco (Vice-Chairman)
Douglas Mills
Susan O'Brien
Jane Palmer

Members also Present:

Tony Burles

1. APOLOGIES FOR ABSENCE

Apologies were received from Councillor Martin Goddard and Councillor Eddie Lavery.

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 minutes and decisions of the Cabinet meeting held on 16 June 2022 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

It was confirmed items to be considered in public and private were as set out on the agenda.

5. COUNCIL STRATEGY 2022-2026

RESOLVED:

That the Cabinet:

1. Approves Hillingdon's draft Council Strategy 2022-26 in Appendix 1 for consultation and;
2. Agrees to receive the final Council Strategy 2022-2026 in October 2022, informed by the findings from the proposed consultation process, in order to recommend the Strategy to full Council for adoption.

Reasons for decision

Cabinet agreed to consult on a new draft strategy setting out a clear vision for the Borough and the Council for the next four years.

The Leader of the Council explained how it would set out the Council's ambitions, be a concise document and divided into 5 themes. The Leader welcomed the upcoming consultation period with residents to ensure it would take into account their priorities too.

The Leader outlined the process for the Strategy's consideration and ultimate approval, which would include the select committees and then finally the full Council.

Alternative options considered and rejected

None.

Relevant Select Committee	All
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	This matter is not for call-in as it is a policy framework document in the Council's Constitution and, therefore will be considered by all select committees.
Officer(s) to action	Dan Kennedy
Directorate	Central Services
Classification	Public
	<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. OLDER PEOPLE'S PLAN UPDATE

RESOLVED:

That Cabinet notes the successes to date and continued progress to deliver the Older People's Action Plan during 2021-22 to improve the quality of life, health and wellbeing of older people in Hillingdon.

Reasons for decision

Cabinet received a useful update on the Older People's Action Plan setting out the work to support older people to live independent, active, healthy lives and provide opportunities to improve their well-being.

The Cabinet Member for Health and Social Care demonstrated the Council's commitment to supporting older people and noted the recent Older Peoples' Assembly that had taken place. Some specific activities in the Plan were outlined by the Cabinet Member including the Telecareline service, free Burglar Alarms, a new physical activity strategy, chairbics, dementia friendly training, grants via the Leader's Initiative and funding from the Council to AGE UK to assist more vulnerable Older People to have access to the Internet to combat loneliness and support their mental health.

Alternative options considered and rejected

None.

Relevant Select Committee	Health & Social Care
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	This matter is not for call-in, as noting only.
Officer(s) to action	Kevin Byrne
Directorate	Central Services
Classification	Public
	<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. OUTCOME OF CONSULTATION ON THE PROPOSED SATELLITE OF MEADOW SPECIAL SCHOOL ON THE HAREFIELD ACADEMY SITE AND INCREASE IN NUMBER OF PLACES

RESOLVED:

That Cabinet consider the responses to the statutory consultation as set out in the report and Appendix 4 and approve the proposed satellite of Meadow High School at the Harefield Boarding Block and subsequent increase in number of places.

Reasons for decision

Cabinet considered the responses from the statutory consultation into the expansion of Meadow High School and the creation of new places at a satellite hub at Harefield Academy and weighing up all relevant factors, it agreed the statutory proposals to enable this.

The Cabinet Member for Children, Families and Education noted that Meadow High School was the largest special school in the Borough and welcomed that the school had also done a significant amount of work consulting with the parents and staff on the proposals.

The Cabinet Member set out how the plans would provide an increase in SEND places and also support the Council’s Dedicated Schools Grant Safety Valve Agreement.

Alternative options considered and rejected

Cabinet could have decided not to proceed with the statutory plans for the school expansion, but considered this not to be an option given the importance of additional SEND places needed in the Borough.

Relevant Select Committee	Children, Families & Education
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	5pm, 15 July 2022
Officer(s) to action	Nav Minas / Vikram Hansrani
Directorate	Education & SEND
Classification	Public
	<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. CARERS STRATEGY UPDATE

RESOLVED:

That Cabinet:

1. Notes progress against the Carers' Strategy delivery plan activity for 2021-22 and the work that the Council and its partners does to support those with caring responsibilities in the Borough.
2. Approves the 2022/23 Delivery Plan.

Reasons for decision

Cabinet received a report updating it on progress delivering the current Carers' Delivery Plan whilst outlining the ensuing year's Plan and objectives.

The Cabinet Member for Health and Social Care indicated her utmost respect for the work of carers and outlined some of the difficulties faced in their lives. The processes and organisations involved supporting carers were explained and thanks were paid to the previous Carers' Champion, Councillor Becky Haggar. The Cabinet Member noted the comments of the Health and Social Care Select Committee and would ensure that they could continue to monitor the delivery of the Plan going forward.

The Cabinet Member for Children, Families and Education spoke of the challenges facing many young carers, particularly over the recent years. The Cabinet Member welcomed the activities and support provided to them via the Council, including access to mental health professionals, a school liaison post, day trips for respite and referrals to summer holiday activity programmes.

The Leader of the Council expressed his thoughts on the positive practical actions being taken that touch on the lives of carers.

Alternative options considered and rejected

None.

Relevant Select Committee	Health & Social Care / Children, Families & Education
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	5pm, Friday 15 July 2022
Officer(s) to action	Gary Collier
Directorate	Adult Services and Health
Classification	Public
	<i>The report and any background papers relating to this</i>

9. MONTHLY COUNCIL BUDGET MONITORING REPORT

RESOLVED:

That the Cabinet:

- 1. Note the budget monitoring position and treasury management update as at May 2022 (Month 2) as outlined in Part A of this report.**
- 2. Approve the financial recommendations set out below:**
 - a) Approves re-phasing of £25,257k 2021/22 General Fund capital expenditure and financing budgets into future years and the re-phasing of £2,298k 2022/23 Schools Conditions Building Programme funding into future years.**
 - b) Approves re-phasing of £27,765k 2021/22 HRA capital expenditure and financing budgets into future years.**
 - c) Accept revenue grant funding of £5,383k for 2022/23 through to 2024/25 from the Department for Levelling Up, Housing and Communities to deliver a multi-year programme of projects and support to end Rough Sleeping.**
 - d) Accept revenue grant funding of £59k for 2022/23 from the GLA to support the Council Property buy back programme.**
 - e) Approve changes to the Council's Discretionary Council Tax Energy Rebate Scheme set out in the report.**

Reasons for decision

Cabinet was updated on the forecast revenue, capital and treasury position for the current year 2022/23 in order to ensure the Council achieved its budgetary and service objectives.

The Leader of the Council informed Cabinet that operating budgets were on track along with the Council's savings targets. The Leader explained how pressures relating to the COVID-19 pandemic were still impacting in two ways, through increased demand on services and reduced income. Additionally, the Leader noted the inflationary impact on the Council's budgets. It was welcomed that the Council was expected to manage such pressures within the current financial year and that there would be no requirement to call on reserves. However, it was noted that the Council would need to increase its savings target going forward and that Cabinet would be updated more fully on this later in the year.

A number of financial recommendations were moved by the Leader including the acceptance of grant funding and a change to the Council's Discretionary Council Tax Energy Rebate Scheme as set out in the report.

Alternative options considered and rejected

None.

Relevant Select Committee	Finance & Corporate
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Cabinet's decisions 2 (a-e) can be called in by 5pm Friday 15 July 2022.
Officer(s) to action	Andy Evans
Directorate	Resources
Classification	Public
	<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>

10. PUBLIC PREVIEW OF MATTERS TO BE CONSIDERED IN PRIVATE

RESOLVED:

That Cabinet note the reports to be considered later in private and Part 2 of the Cabinet agenda and comment on them as appropriate for public information purposes.

Reasons for decision

The Leader of the Council introduced the report which provided a public summary of the matters to be discussed in the private part of the Cabinet meeting later.

The Cabinet Member for Children, Families and Education informed Cabinet that adult education services at the Brookfield site in Uxbridge were being relocated to the Civic Centre, which subject to Cabinet's decision later, would enable Orchard Hill College to use the site and provide additional SEND places locally. It was welcomed that this proposal would support the Council's Dedicated Schools Budget Safety Valve Agreement and the Leader of the Council noted the proposed service benefits and efficiency gains from the best use of the Council's assets.

Alternative options considered and rejected

These were set out in the public Cabinet report.

Relevant Select Committee	N/A
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	This matter is not for call-in, as noting only.

Officer(s) to action	Mark Braddock
Directorate	Central Services
Classification	Public
	<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>

11. CONTRACT FOR THE SUPPLY, ERECTION & REPAIR OF FENCING AND GATING

RESOLVED:

That the Cabinet:

- 1. Accept the tender from Cyril Smith Fencing Limited for the provision of the supply, delivery, erection, maintenance and repair of fencing and gating to the London Borough of Hillingdon for a period of 3 years at the estimated value of £270k per annum.**
- 2. Furthermore, agrees that this includes the provision to extend the contract for a period of 2 years, subject to the approval of the Leader of the Council and Cabinet Member for Property, Highways & Transport, in consultation with the Corporate Director for Place.**

Reasons for decision

Following a competitive tender, Cabinet agreed to appoint a professional contractor to undertake reactive repairs to fencing and gating throughout the housing stock and corporate buildings.

Alternative options considered and rejected

Cabinet could have instructed officers to consider quotations on a case-by-case basis, but deemed this not value-for-money.

Relevant Select Committee	Property, Highways & Transport
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	5pm, Friday 15 July 2022
Officer(s) to action	Liam Bentley
Directorate	Place
Classification	Private
	<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</i>

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).

12. ASBESTOS REMOVAL & MAKING SAFE SERVICE CONTRACT

RESOLVED:

That Cabinet:

1. **Accept the tender from European Asbestos Services Ltd for the provision of an Asbestos Removal & Making Safe Service to the London Borough of Hillingdon for three year period from 1 September 2022.**
2. **Furthermore, agrees that this includes the option to extend for a two year period, subject to approval from the Leader of the Council and Cabinet Member for Property, Highways & Transport, in consultation with the Corporate Director of Place.**

Reasons for decision

Following a competitive tender, Cabinet agreed a qualified contractor to support the Council's Repairs Team and undertake an asbestos removal and making safe service to the Council's housing stock and other corporate buildings.

Alternative options considered and rejected

None, as a licenced contractor was required to remove asbestos.

Relevant Select Committee	Property, Highways & Transport
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	5pm, Friday 15 July 2022
Officer(s) to action	Liam Bentley
Directorate	Place
Classification	Private <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. GRANT OF LEASE FOR THE BROOKFIELD ADULT EDUCATION CENTRE, UXBRIDGE

RESOLVED:

That the Cabinet authorises the grant of a 25-year lease to Orchard Hill College of the Brookfield Adult Education Centre, Park Road, Uxbridge on the terms outlined in this report.

Reasons for decision

Cabinet agreed to lease the former Brookfield Adult Education Centre site in Uxbridge to an external partner to continue to provide specialist education special needs provision in the Borough. Cabinet noted that the adult education service would be relocated to the Civic Centre in Uxbridge and the move would also support the Council’s Dedicated Schools Budget Recovery Plan.

Alternative options considered and rejected

None.

Relevant Select Committee	Property, Highways & Transport
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	5pm, Friday 15 July 2022
Officer(s) to action	Michelle Wilcox
Directorate	Place
Classification	Private <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>

14. ANY OTHER ITEMS THE CHAIRMAN AGREES ARE RELEVANT OR URGENT

Before the meeting closed, Cabinet confirmed their full approval of the recommendation in relation to Item 7 on the agenda on the outcome of the statutory consultation on the proposed satellite of Meadow Special School on the Harefield Academy site and increase in the number of places. This was because during the public part of the meeting, Cabinet had inadvertently indicated that the matter had been noted only.

No additional items were considered by the Cabinet.

The meeting closed at 7.24pm

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 15 July 2022

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@hillingdon.gov.uk

Democratic Services: 01895 250636

Media enquiries: 01895 250403

STRATEGIC CLIMATE CHANGE ACTION PLAN PROGRESS REPORT AND CLIMATE COMMITMENT CHARTER FOR PROCUREMENT

Cabinet Member(s)	Cllr Eddie Lavery
Cabinet Portfolio(s)	Residents' Services
Officer Contact(s)	Ian Thynne - Place Directorate
Papers with report	Appendix 1 – Strategic Climate Action Plan – Progress Report Appendix 2 – Climate Commitment Charter for procurement

HEADLINES

Summary	The Report provides an update on the objectives set out in the Strategic Climate Action Plan (adopted July 2021). The report also addresses each of the objectives and sets out the priorities for the next reporting cycle to ensure the Council is making sufficient progress to achieving carbon neutrality across its own operations by 2030. In addition, the Council has an opportunity to sign up to a low carbon procurement charter in collaboration with West London partners. The Charter addresses the carbon emissions embedded within the procurement supply chain; by working with neighbouring boroughs, action can be taken to decarbonise this supply chain.
Putting our Residents First	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.</i> It also demonstrates progress against the Council's adopted Strategic Climate Action Plan.
Financial Cost	The financial implications relate to officer time. Priority work identified for 2022/23 fits within core functions however, opportunities to access Section 106 funding and secure grants from external sources is being pursued. There are no direct financial implications of this report.
Relevant Select Committee	Residents' Services Select Committee
Wards	All Wards

RECOMMENDATIONS

That the Cabinet:

1. **Notes the progress made in the Strategic Climate Action Plan Progress Report in Appendix 1;**
2. **Approves the priorities identified in this report and;**
3. **Agrees to the Council being a signatory to the Climate Commitment Charter for procurement purposes in Appendix 2.**

Reasons for recommendation

The Council's Strategic Climate Action Plan (2021) sets out the objectives to be taken to achieving the Council's aspirations to achieve carbon neutrality across its own operations by 2030. This progress report is an annual update that measures progress in an open and transparent manner. It identifies challenges and sets out priorities for the coming year to ensure there is clear focus on tackling the climate change emergency. The Climate Commitment Charter helps achieves the Council's aspirations for securing reductions in emissions associated with the supply chain.

In summary the report identifies progress against the three key areas that make up the Council's carbon footprint:

- **Electricity usage:** The available data shows a 30% drop in emissions associated with electricity usage. This represents significant progress. In addition, over 80% of the electricity used for the Council operations is accredited from renewable sources.
- **Gas usage:** As explained in the report, gas usage has been significantly impacted by a change from estimated to actual monitoring readings. This has resulted in a slight increase in emissions. However, it is important to understand that this does not mean usage has risen. The switch to automatic readings was necessary to ensure the actual carbon footprint was recorded. This has presented the Council with a larger challenge than previously understood but has been captured early enough in the Plan period (i.e. up to 2030) for action to be prioritised.
- **Fleet:** The report has identified that the Council's fleet has improved dramatically since the baseline position was established in 2019/20. However, the report also recognises that work is required to properly capture the carbon emissions associated with fleet operations across the Council. It is recognised that this is a priority for the 2022/23 reporting cycle.

Overall, there has been a 10% drop in emissions from the baseline reported in 2019/20 although significantly higher when factoring in the energy procured from renewable energy certificates. However, the move to automatic gas readings has hindered a more positive outturn.

In addition, the Council has an opportunity to sign up to a low carbon procurement charter in collaboration with West London partners. The Charter addresses the carbon emissions

embedded within the procurement supply chain; by working with neighbouring boroughs, action can be taken to decarbonise this supply chain.

Alternative options considered / risk management

The Council has committed to undertaking an annual progress report of the Strategic Climate Action Plan. Alternative options were, therefore, not considered.

The Council can opt out of signing the Climate Commitment Charter. However, it is considered that this would be out of step with neighbouring boroughs and alternative arrangements would be required to meet the commitments to reducing emissions in the supply chain. Working collaboratively with neighbouring boroughs provides a greater opportunity in securing low carbon supply chains.

Select Committee comments

None at this stage.

SUPPORTING INFORMATION

Background

1. The Council declared a climate emergency in 2020 and adopted its Strategic Climate Action Plan in 2021. The Plan provides the roadmap to securing the ambitious target of achieving carbon neutrality across council operations by 2030.
2. The Plan also commits to various other objectives and action plans that require outcomes beyond just reducing carbon emissions. It sets out aspirations to be a leader for businesses, communities, and educational facilities to reduce their own carbon footprint.
3. The Plan identifies six corporate commitments and a suite of objectives across nine key themes. Importantly, the intent of the Plan was to ensure that all of the Council's operations are set within the context of the declared climate emergency rather than creating additional workstreams.

Purpose of the Progress Report

4. Achieving carbon neutrality and becoming a borough leader will however require the prioritisation of existing workstreams or altering focus to tackle emerging challenges. The annual progress report is the key document in providing that framework. It sets out the progress against the objectives and targets in the Plan and allows challenges to be identified early enough to ensure workstreams can be prioritised to tackle them.

Summary Findings

5. The progress report, set out in Appendix 1, has identified positive movement in terms of the Council's carbon emissions. There are essentially three main areas that contribute to the Council's operational carbon footprint: Electricity usage, gas consumption and

business (including fleet) mileage. Additional emissions associated with other equipment, such as those used by green spaces amount to a fraction of a percentage of the overall carbon footprint.

6. Electricity: There has been a significant reduction in emissions from electricity usage particularly across the two main contributors, the Civic Centre and Streetlighting which have seen a 31% reduction. In total, the emissions associated with electricity have seen a drop of 29% from the 2019/20 baseline.
7. Further good news can be factored in through the accredited renewable energy supplies used to provide over 50% of the electricity used. This means that the actual emissions associated with electricity usage for 2021/22 is around 1300 tonnes which equates to a 70% reduction from the baseline. This is exceptional news.
8. However, as identified in the progress report, the Council is targeting demand reduction before placing reliance on renewable energy supplies. Although electricity from accredited zero carbon sources is beneficial, the Council would nonetheless be relying on the volatile energy markets. Reducing demand at source remains the priority.
9. Gas: The situation related to gas is somewhat different to the electricity usage. In 2021 the Council moved a range of buildings from estimated gas readings to automatic meter readings. This has revealed a significant under reporting of the actual consumption in the baseline position and the Progress report is showing a 27% increase in emissions.
10. It must be noted though that in general consumption of gas is more consistent as it is linked to infrastructure within the building and is not 'topped up' by additional sources; for example, electricity usage is dependent on a range of equipment such as laptops and computers for thousands of staff as well as associated servers; there are also more variables related to electricity usage as opposed to the two predominant sources of gas consumption, water and space heating.
11. There is no reason to believe that the actual consumption of gas has increased dramatically since 2019/20. Therefore, it is assumed that the reported increases are related to the move from estimated to actual readings, revealing that the former was significantly out of step with the latter. The progress report reflects a more accurate position and captures the actual emissions associated with gas usage. This is a positive development. However, the obvious concern is that the estimated emissions associated with gas used in the Action Plan gave an inaccurate starting position. The meter readings for the Civic Centre set out in the progress report show nearly a 100% increase in emissions from the starting position set out in the Action Plan. This introduces a challenge, and it is necessary to respond by prioritising gas related action for 2022/23.
12. An analysis of the fleet and business vehicles shows a considerably new stock than was available when the baseline position was presented. However, capturing of emissions associated with the fleet and business mileage requires further work to be of value. Fleet emissions are inherently complicated by the type of vehicles and importantly the number of miles.

13. The progress report has identified an improved fleet stock which is a positive. However, a priority for 2022/23 is to develop the reporting tools to properly capture the associated emissions. Notwithstanding that, work continues to consider further improvements to the fleet and is expected to progress in 2022/23. In addition, significant work is underway to review the waste collection routes to provide efficiencies and reduce mileage. Training has also been carried out for operatives to reduce vehicle idling.
14. Overall: The progress is positive and there has been nearly a 10% reduction in emissions from gas and electricity. The fleet emissions are likely to have reduced due to the high performance of the vehicles in use but work to capture the associated emissions is essential.

Priorities

15. The progress report identifies a series of priorities for 2022/23 these include:
- a. Identification of assets to be retained and prioritised for carbon savings.
 - b. Identifying large gas consuming assets and prioritising actions to determine solutions in particular relating to the Civic Centre. All building managers will be contacted to prioritise gas and electricity savings.
 - c. Securing the toolkits and methodologies to accurately record and monitor emissions associated with fleet mileage.
 - d. To progress work on identifying opportunities for electricity generation from solar power.
 - e. To progress work on identifying opportunities for tree planting to offset carbon emissions.
 - f. To commence work on the Council's climate adaptation strategy in light of the importance of the growing threat from extreme weather.
 - g. Improve carbon reporting and to identify a consistent toolkit for capturing all emissions to enable robust data to be upload to the Council website for public scrutiny.
 - h. To develop a programme of work that sets the targets for all the objectives and action plans set out in the Plan.
 - i. To embed the actions from the Plan in the emerging Corporate Strategy.
 - j. To ensure all objectives and workstreams set out in the Plan have a home in subsequent Service plans.
 - k. To develop an engagement strategy with schools, communities, and businesses.
 - l. To commence work on understanding the carbon footprint associated with procured services and work towards securing low carbon procurement frameworks.
16. The above is in addition to business-as-usual operations relating to emissions reductions. For example, flood and air quality action plans, waste management and the review of waste refuse routes along with other work linked to the Plan should continue at pace.

Climate Commitment Charter for Procurement

17. In response to the Council motion in November 2021, officers are recommending the Council sign-up to the West London Alliance Climate Commitment Charter in Appendix 2 that will assist with identifying emissions associated with the supply chain and helping to secure carbon reduction.
18. To underpin this, a low-carbon procurement toolkit has been developed to adopt climate considerations into procurement processes and to help to deliver low carbon goods and services via its supply chain. Training for Procurement officers took place in March and will increasingly contribute towards making Hillingdon's own operations carbon neutral by 2030.
19. All of this is intended to ensure that all our suppliers are committed to joining the Council on this important journey to reduce carbon emissions. Over the coming months, procurement officers and commissioning managers will ensure that tenders reflect the Net Carbon Zero aspirations of the Council.
20. To further support this work, officers recently offered and delivered training to our supply chain to create greater knowledge and awareness. These sessions were recorded, and procurement are planning to make the training available via the Council's website.
21. In order to help manage costs and to ensure a more coordinated approach, this work has been undertaken with the other West London boroughs.

Financial Implications

There are no direct financial implications arising from this strategic progress update.

RESIDENT BENEFIT & CONSULTATION

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

The Climate Change Action Plan sets out the action the Council has taken to date to significantly reduce its own carbon emissions and the outline actions needed to be fully carbon neutral across the Borough by 2030. Taking action to continue to further reduce carbon emissions and adapt to the impact of climate change will help residents, businesses and communities to avoid disruption to day to day lives, and ensure the Borough is a cleaner and healthier place to live.

Consultation carried out or required

The Council's Strategic Climate Action Plan was subject to public consultation. This report provides an update on progress against actions within the Plan.

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance has reviewed this report and confirms that there are no direct financial implications associated with the recommendations within this report.

Corporate Finance further notes the Council's commitment to becoming carbon neutral by 2030 and to reduce carbon across the property portfolio. The impact of individual priorities will be reviewed as part of ongoing work and as part of the wider MTFF budget setting process.

Legal

Legal Services confirm that there are no specific legal implications arising from this report. Further legal advice will be given as necessary to ensure that the Council continues to meet its obligations under the climate change legislation.

BACKGROUND PAPERS

[Council Motion – Climate Emergency Declaration – 16 January 2020](#)

[Strategic Climate Action Plan approved by Cabinet – 8 July 2021](#)

[Council Motion – Climate Targets Update - 18 November 2021](#)

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London Borough of Hillingdon

**The Strategic Climate Action Plan
Progress Report
2021 - 2022**

**Pre-Publication Draft
August 2022**

Foreword

It's been a little over one year since I asked cabinet to adopt our Strategic Climate Action Plan. In my introduction to that Plan, I spoke of the rapidly changing climate and how the impacts were not some distance challenges in far off places.

We are already suffering the impacts in this borough and this foreword is written at a time of the longest dry spell since 1976, with record temperatures of over 40 degrees Celsius recorded all on the back of serious flood events in the last couple of years. Taking action is essential and the Plan committed the council to various tasks and objectives to do just.

As part of the Plan, I committed to ensuring we provide an annual report that sets out our progress in meeting the ambitious target of carbon neutral operations by 2030 as well the other objectives.

I am pleased to report significant progress has been made against the carbon footprint set out in 2019/2020. We have achieved large scale reductions in our electricity consumption and when factoring in grid supplies from certified renewable energy sources, the emissions associated with this are 90% lower than the baseline.

Gas usage provides a different position. When committing to being carbon neutral by 2030 we needed to learn more about its actual emissions. This meant moving from estimated to automatic gas readings. On a positive note, this means we now have a much clearer position on gas consumption and emissions. Unfortunately, this has meant our reporting shows a 36% higher level of emissions than in the baseline. It is important to note, real time consumption has not increased, we just have more accurate data.

Fortunately, this is captured early in the cycle and allows us to prioritise work in this area for 2022/23.

Overall, we have achieved a 54% saving in actual emissions associated with gas and electricity consumed. This is good progress but is just a part of the plan though. The progress report sets out the work being undertaken across the scope of objectives.

Our primary task was to ensure we have got our own house in order. For 2022/23 we will be working more closely with our residents, schools and businesses, as well as securing more information about our own carbon emissions.

Progress is positive and we will continue to push ourselves and others to make the changes necessary to tackle this climate emergency.

Councillor Eddie Lavery
Cabinet Member for Residents' Services

Introduction

The Council's Commitment

The Council declared a climate emergency in 2020 and set upon a path to achieve carbon neutrality from its own operations by 2030. There are now over 300 local authorities who have declared a climate emergency with varying locally set targets for carbon neutrality.

In July 2021, the Council adopted its own Strategic Climate Action Plan following lengthy consultation and involvement from a diverse range of respondents, including residents, climate action groups and businesses.

The Plan sets out the Council's corporate commitments and key objectives to meet the ambitious 2030 target. It is all set against the Council's vision:

To become the greenest London borough, to protect and enhance the environment, and to provide a brighter prospect for future generations.

The plan is further divided into 6 Corporate Climate Commitments and then core objectives set against 9 key themes. The Plan is designed to direct and capture all the work associated with tackling the Climate Emergency in one place.

What is the Progress Report?

Key Theme 9 of the Plan relates to transparency and commits the Council to producing an annual progress report as well as a full review of the plan in 2024.

This progress report is therefore designed to capture the work undertaken during the fiscal year of 2021 to 2022.

The report sets out the updated carbon footprint and identifies a selection of key projects and work that reflect the objectives of the Plan. It also describes the priorities for the next reporting year.

Updated Baseline

Background

The 2021 Strategic Climate Action Plan ('the Plan') reported baseline data from the 2019 fiscal year ending in March 2020. This data was based on best practice and the availability of information.

The declaration of the climate emergency has prompted a review of the data collected and in particular to capture information on the full extent of the Council's carbon emissions. It must be noted that the Council is responsible for a wide range of services and activities and reporting tools have not always been consistent with the need to capture carbon related information, for example, the exact type of vehicle, the emissions per mileage and the amount of mileage being recorded.

This means the baseline position for 2019/20 included assumptions which were not reflective of every element of the Council's carbon footprint. Significant attention has been dedicated to resolving this which means that more is understood about the 2019 baseline position. Work continues to provide a more accurate understanding of the full extent of the Council's carbon footprint right down to finer detail such as machinery and equipment used by contractors.

This is a complex piece of work in itself. For example, capturing a specific type of refuse vehicle and exactly how many miles does it cover. This requires changes to reporting methods and data capture that are still being explored.

More is known about the Council's carbon footprint but as set out in the 'Priority' section of this report, it is essential to ensure this information is comprehensively considered, produced and in line with the reporting commitments in the plan and then made available on the Council's website for reasons of transparency.

Gas

Another area that impacts the baseline position is the use of estimated energy readings as opposed to actual usage. Estimated readings are invariably inconsistent with actual usage and can be significantly out of step. This is particularly pertinent for buildings with large consumption such as the Civic Centre.

Movements from estimated readings, which were prevalent in the 2019/20 baseline, to actual readings have seen some significant movement in carbon emissions particularly at the Civic Centre as explained in the next section.

The Council is moving away from estimated readings which will provide a more accurate understanding of the associated carbon emissions. In the short term this

may appear to artificially inflate the actual carbon footprint against the baseline, but the context is important to understand the true direction of travel. It is essential to understand that an increased carbon footprint associated with actual data does not translate to a greater degree of consumption, for example, extended hours of heating in the Civic Centre.

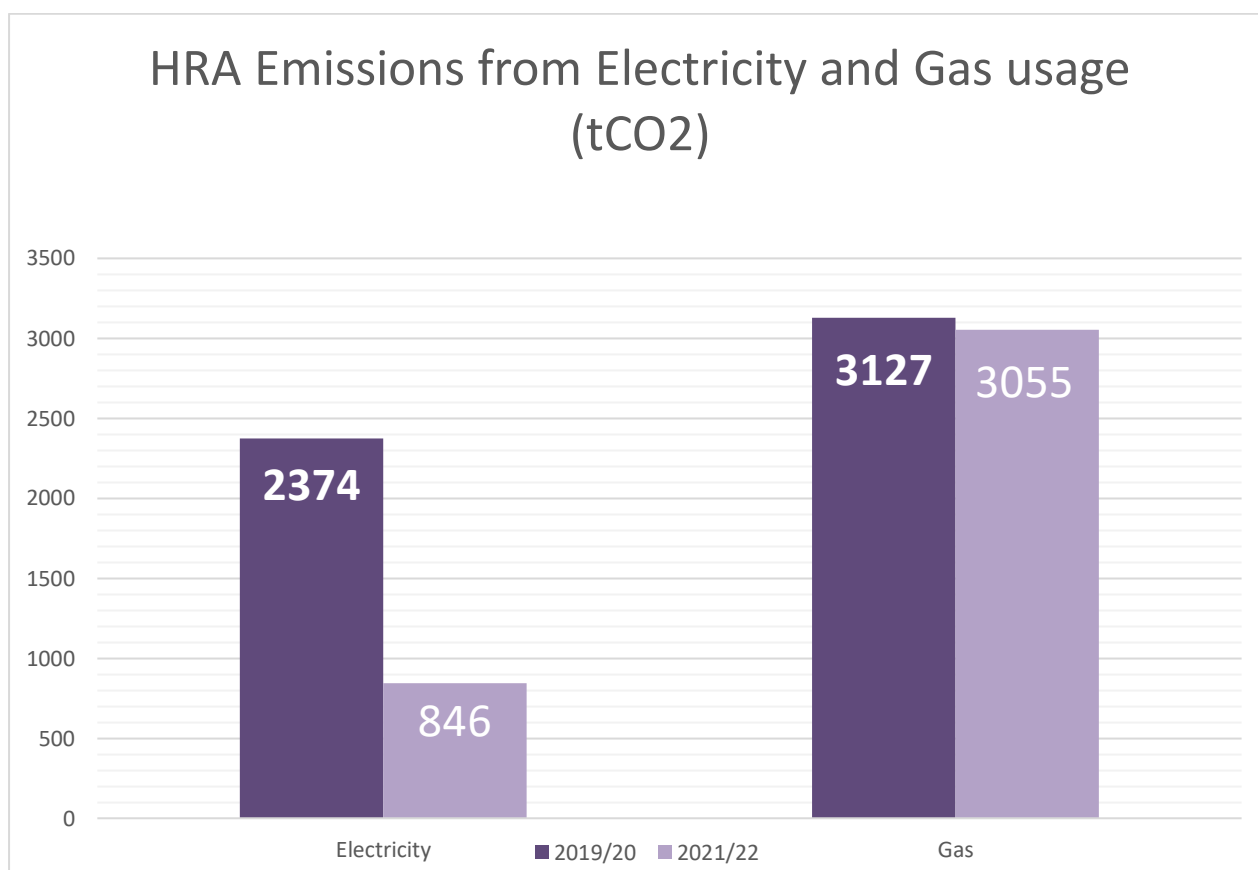
HRA

The Council's 2030 commitment is to ensure that its own carbon footprint, i.e. what it has control over is covered by the carbon neutral commitment. The baseline recorded in the 2019/20 baseline has been interrogated further following inconsistencies with recently captured data.

This analysis has found that the 2019/20 baseline included data for Housing Revenue Account (HRA) residential units. The Council does not control the energy usage of these properties and therefore this is outside the scope of the 2030 carbon neutral commitment.

The 2019/20 baseline has been updated to reflect the removal so as to ensure a fair and consistent method of reporting.

Notwithstanding the above, the HRA data below shows significant reductions in usage and is presented for context.



Transport Mileage

One of the key areas where carbon needs to be better understood relates to emissions from mileage associated with fleet transportation and business use.

The assumptions in the 2019/20 baseline did not accurately reflect what is now being developed about these emissions as more attention has been given to understanding this element of the carbon footprint.

Further work is ongoing though. Cumulative mileage is now recorded but more work is required to refine this further to give an accurate carbon footprint. It will not necessarily be feasible or practical to capture every finite piece of detail to present a completely accurate set of data, but more refinement is possible and necessary.

Reporting the estimated fleet outputs against an incomplete baseline is not considered to be entirely informative. The priority for the next reporting cycle is to firmly establish the tools, methodology and reporting structure to accurately capture fleet emissions.

Progress on Emissions

Introduction

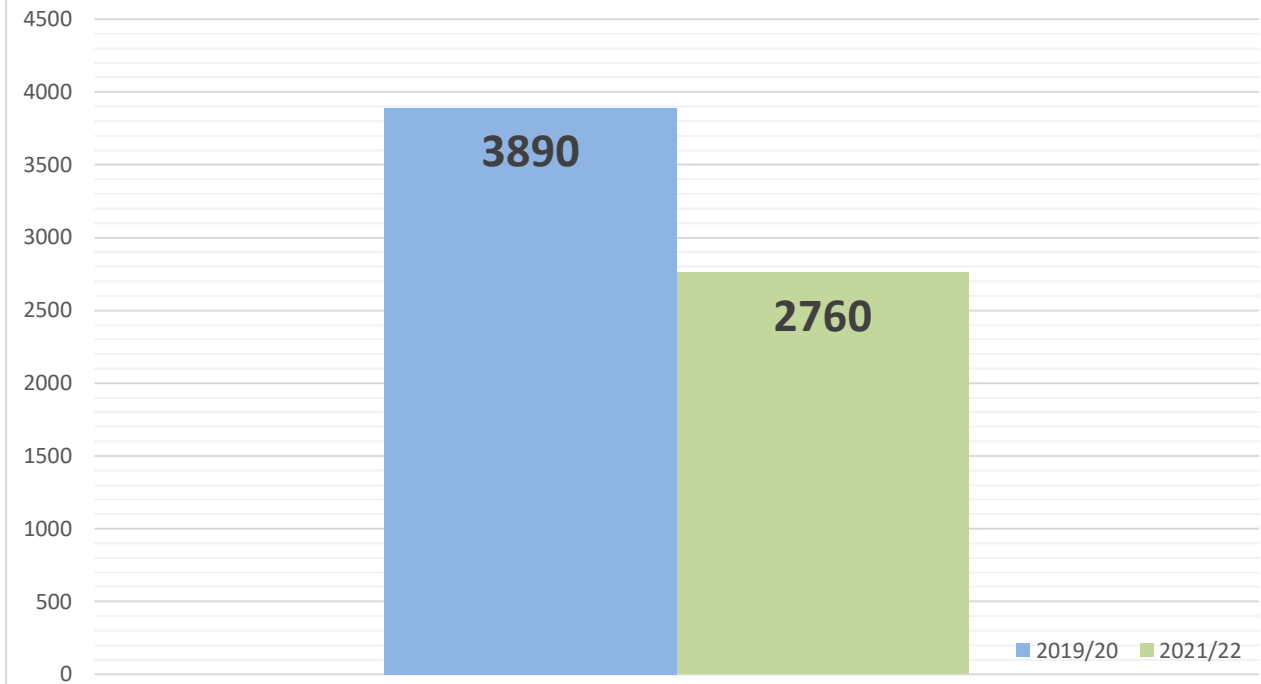
The Plan requires the Council to carry out various actions across a range of services in order to address the climate commitments. Some of these simply capture work already under way others are new pieces of work and some will change business as usual operations.

However, at the heart of the Plan is the Council’s carbon footprint and the carbon neutral target. The target relates to Scope 1 and 2 emissions associated with the Council’s operations.

Scope 1	Scope 2	Scope 3
<p>These include emissions from activities owned or controlled by the Council that release emissions into the atmosphere.</p> <p>They are direct emissions.</p> <p>Examples of Scope 1 emissions include emissions from combustion in owned or controlled boilers, furnaces, and vehicles.</p> <p>This includes the burning of gas in boilers for space and water heating.</p>	<p>These include emissions released into the atmosphere associated with your consumption of purchased electricity, heat, steam and cooling.</p> <p>These are indirect emissions that are a consequence of the Council’s activities, but which occur at sources that other control.</p> <p>This includes electricity consumption to enable Council operations.</p>	<p>Emissions that are a consequence of your actions, which occur at sources which you do not own or control and which are not classed as Scope 2 emissions.</p> <p>Examples of Scope 3 emissions are business travel by means not owned or controlled the Council such as the purchase and supply of materials.</p> <p>This is excluded from the Carbon Neutral commitment by 2030</p>

Electricity

Carbon Emissions from electricity consumption from Corporate Property (tCO₂)



The Council has made some significant progress in relation to the reduction in electricity usage particularly at the Civic Centre and with Streetlighting which are prominent in the carbon footprint.

Grid Electricity

Improvements are continued to be expected through demand management and as the performance of the National Grid becomes more dependent on renewable energy. In simple terms, this means there is less Co₂ associated with one kWhr of electricity used.

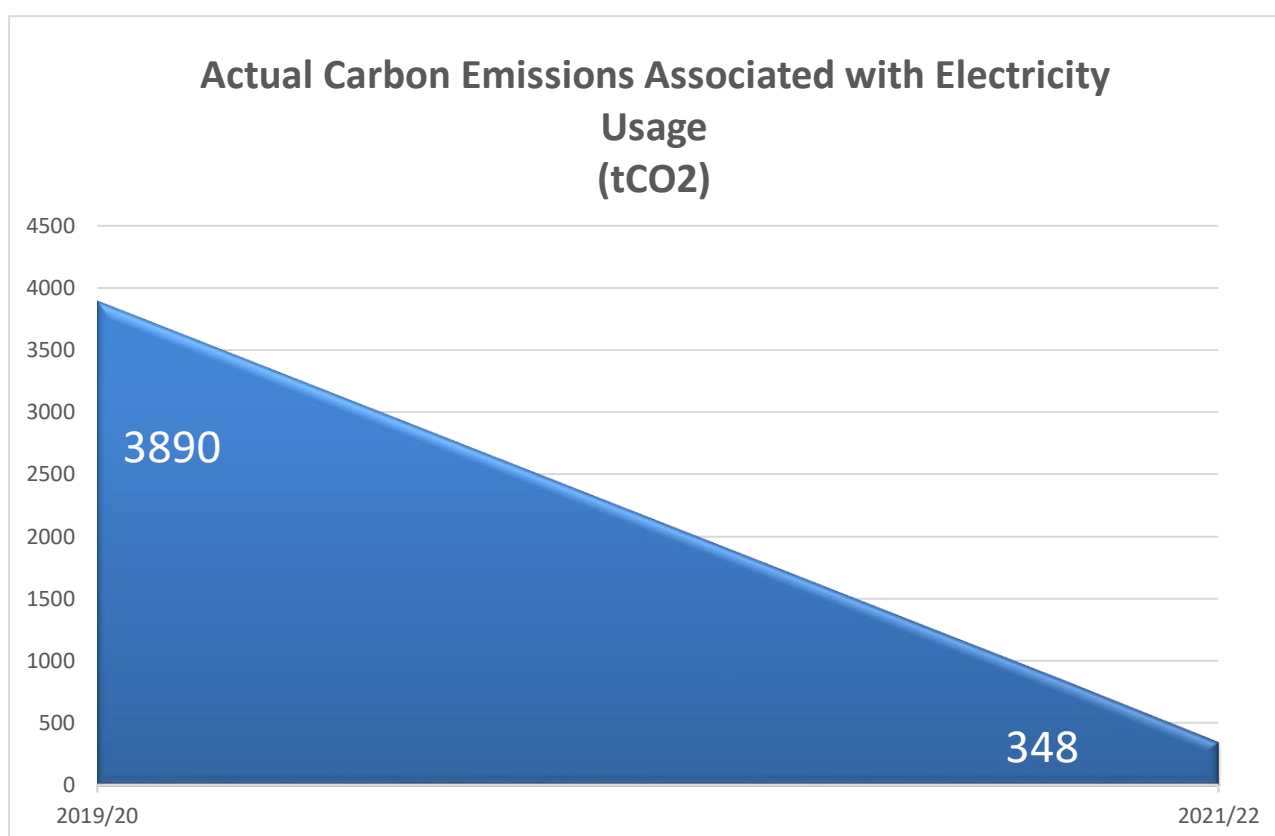
However, electricity use is not just about carbon emissions. An implicit part of the Council's plan is to rely less on electricity from the national grid. In theory if the national grid was 100% renewable, then any electricity consumed by the Council would have virtually zero emissions, but it would still result in expenditure from the public purse. Demand reduction remains a priority and this is reflected in consumption data that underpins the figures presented above.

Renewable energy certificates

The above carbon reporting is based on a generic assessment of emissions per unit of energy used.

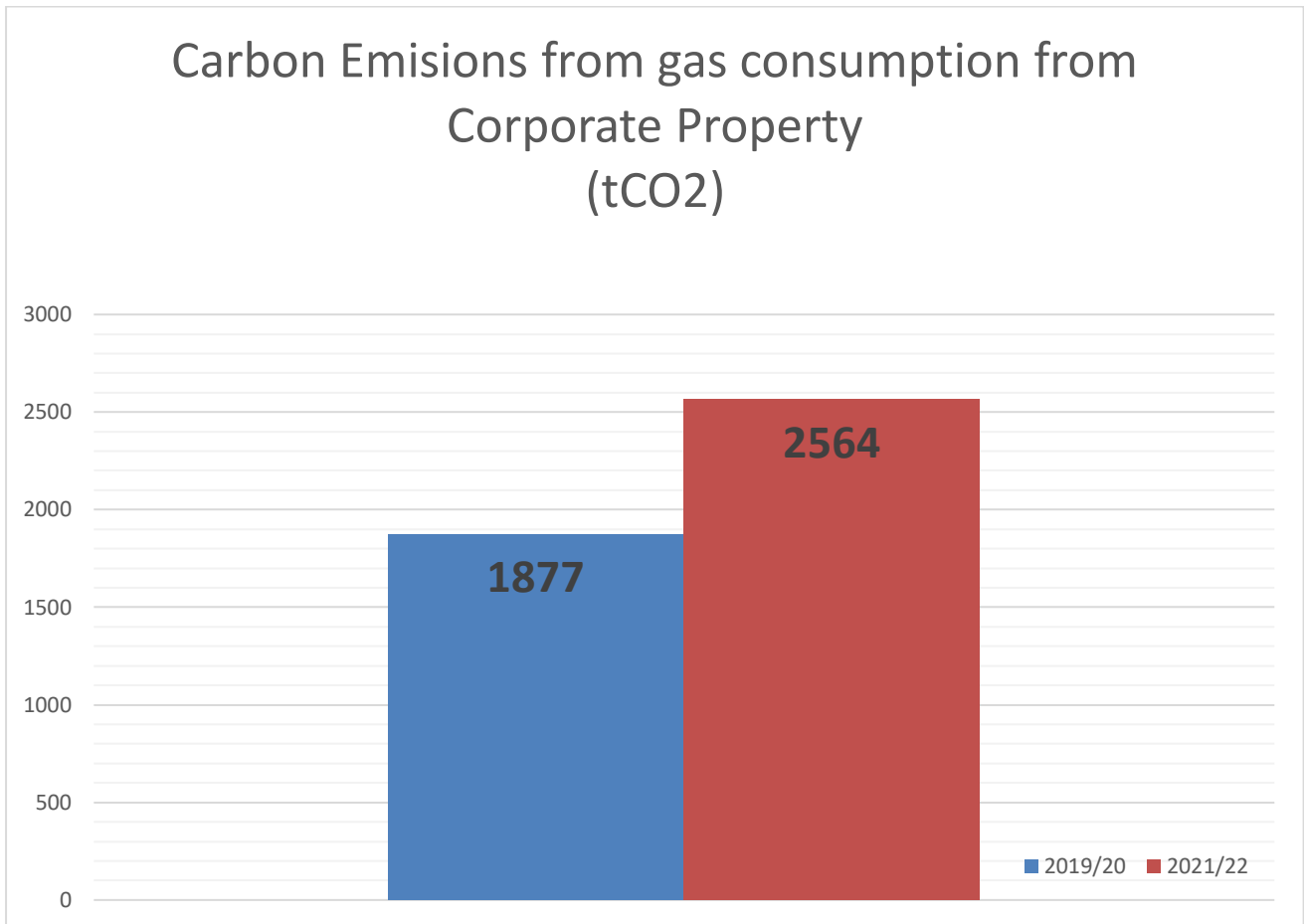
In reality the carbon footprint associated with electricity is much lower. As part of the Plan the Council has committed to sourcing as much electricity from renewable sources as possible, i.e. where the unit of energy has no carbon emissions. This is secured through Renewable Energy Guarantees of Origin (REGO) certificates.

Consequently, the actual emissions associated with the Council's consumption in 2021/2022 is only 348tCO₂. It is worth noting that the Council's carbon footprint in relation to electricity is actually 90% lower than the outputs from the generic assessment.



REGO certificates provide the evidence that the Council is trying to secure carbon reductions wherever possible. However, they should not be relied upon as a primary method for reducing emissions. REGO certificates are dependent on the amount of renewable energy in the National Grid and the number of them available. Securing REGO certificates is likely to become more challenging. Demand management is therefore the preference for achieving carbon neutrality. This remove reliance on others and reduces exposure to what is becoming a more complex and challenging energy market.

Gas

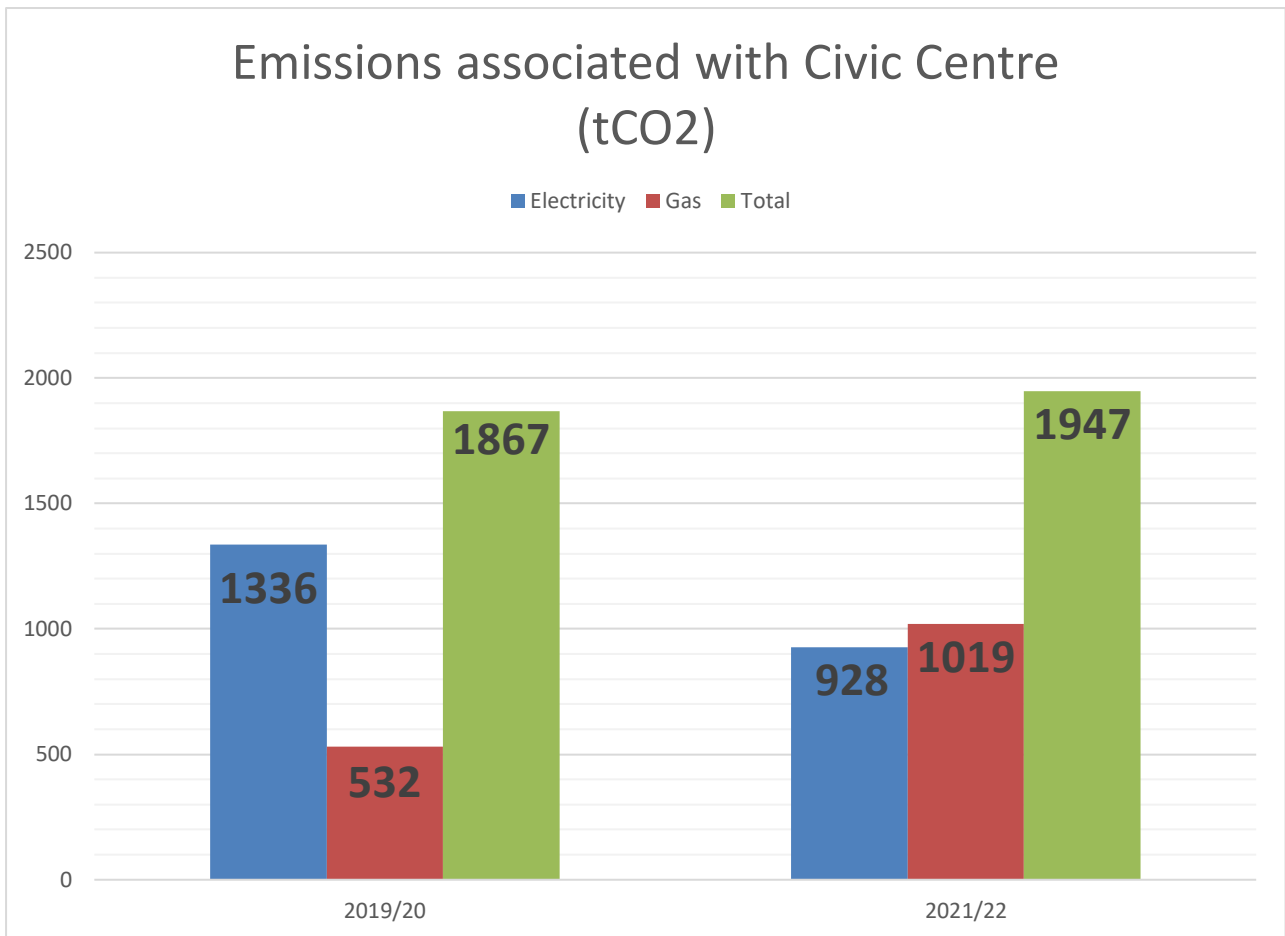


As set out in the previous section one of the significant problems with the gas reporting stems from the changes in estimated readings from the providers to actual monitor readings. It is therefore very important to note that the above does not represent an increase in usage. The Council's carbon emissions have not therefore risen over the last reporting cycle.

Instead, the above illustrates the complexities in managing carbon from grid-based energy supplies particularly where historical methods for determining usage were not necessarily consistent with carbon reporting. Estimated readings were not regularly updated particularly whilst gas prices remained low. The Council opted to move to automatic monitor readings to have a better understanding of its usage and to track the carbon footprint.

As set out in the Priorities for 2022/23 section the accurate data relating to gas consumption provides a much clearer understanding and in turn the need for greater interventions.

Civic Centre

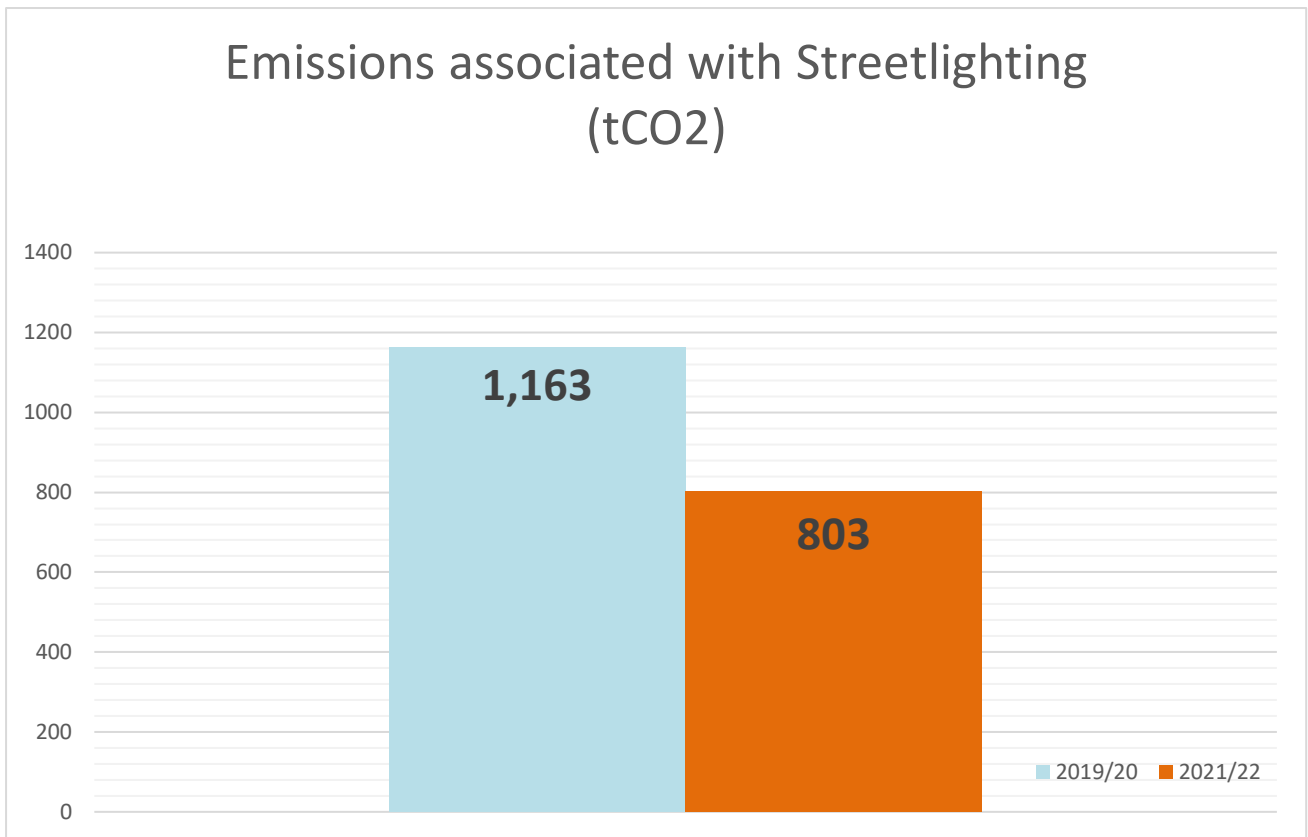


The performance of the Civic Centre continues to be positive in relation to electricity. Further improvements are expected as business operations reduce the intensity of building usage.

The issue with gas consumption is significant and the move to actual readings presents a greater challenge moving forward.

Electricity is easier to manage and control than gas particularly through improved technologies and equipment as well behavioral change. The gas consumption is linked to space and water heating and therefore relies on the infrastructure within the building such as the boilers and distribution. The Civic Centre is an aging building with infrastructure that does not lend itself to 'quick wins' to reduce gas consumption. Significant interventions will be required and assessing the opportunities for demand reduction is considered to be a priority for 2022/23.

Streetlighting



Significant progress has been made in converting streetlighting to LED. This maintains important coverage for the benefit and welfare of residents but reduces the Council's carbon footprint.

Fleet

As set out in the section above, further work on the fleet emissions is required to provide a more realistic position. However, considerable work has been undertaken to improve the fleet stock.

For example:

the baseline for 2019/20 identified the Council's refuse vehicle fleet (26 tonnes) as being made up of 3no. 2011 registered vehicles, 14no. 2013, 3no. 2015 and 4 newer 2018 vehicles. A total of 24 vehicles.

The current fleet make up (26 tonnes) is reduced to 19 with 14no. new 2021 registered and the oldest vehicles are from 2015. These have a significant carbon improvement over their predecessors especially in relation to the pre-Euro 6 2011 models.

Similarly, the rest of the fleet make up has been significantly improved from that used in the baseline report.

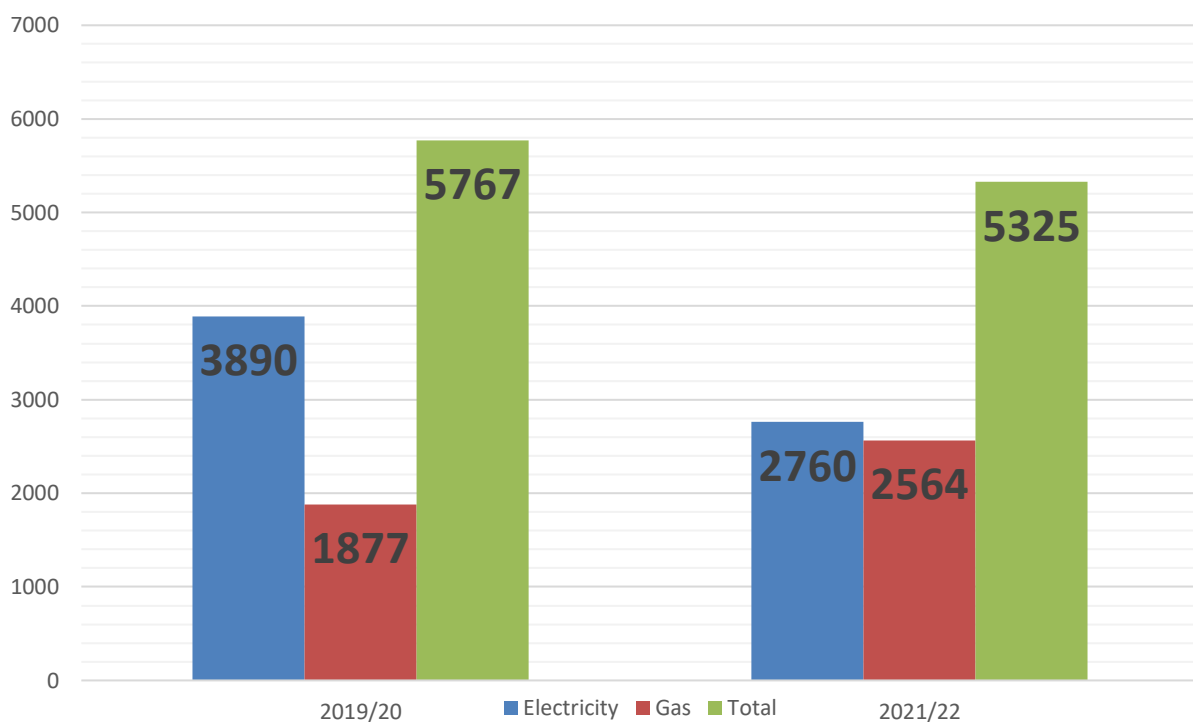
Overall

The overall performance is very positive. The Council has a better understanding of its carbon footprint in relation to electricity and gas, and the general trend continues to be downward. The gas data is positive in that there is now an accurate representation of the carbon footprint, but this has highlighted a more pressing concern than previously thought. The gas usage reporting has been captured early in the Plan period which provides time to identify measures to tackle this more complicated element of the carbon footprint.

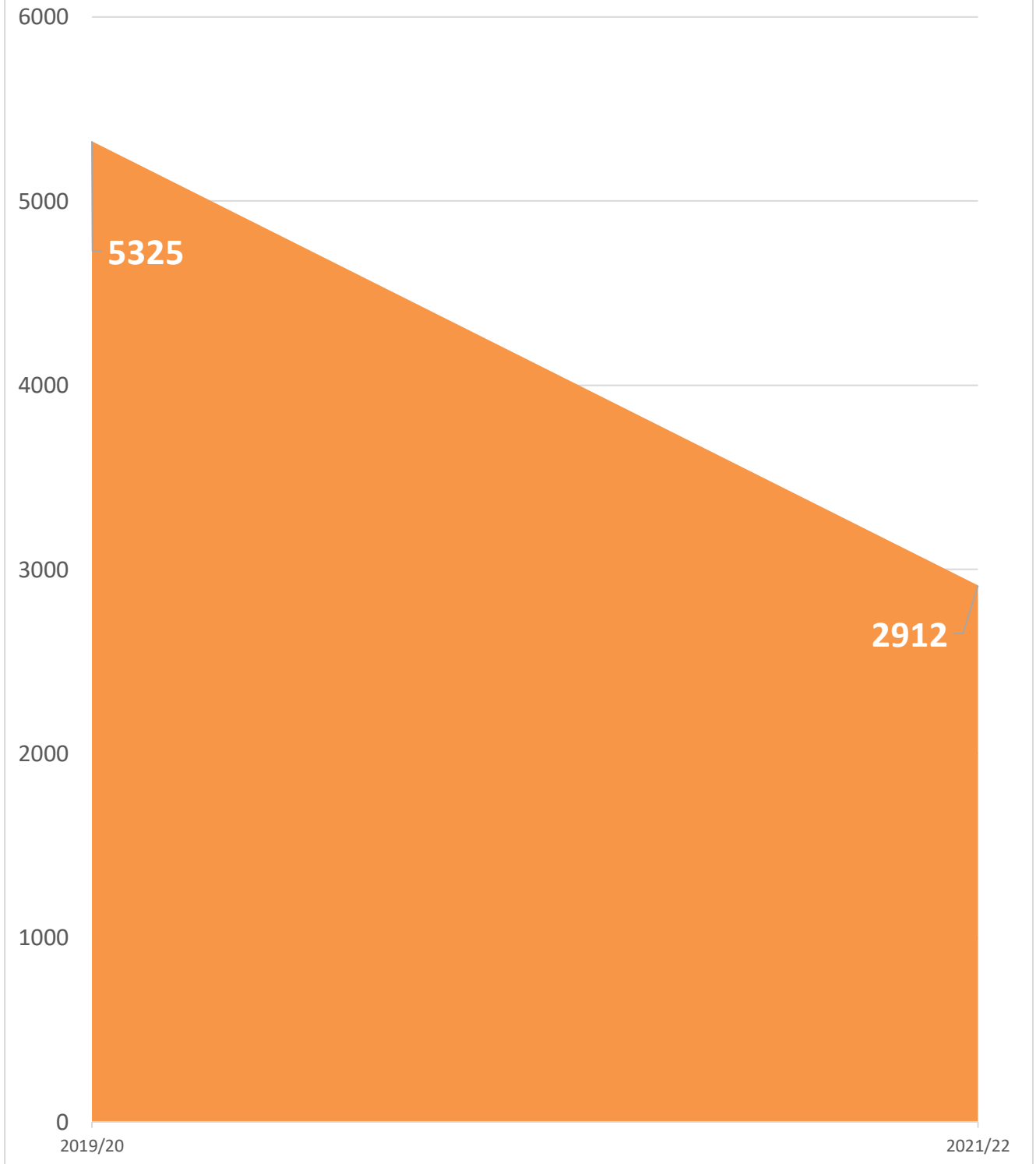
The real emissions, i.e. when REGO certificates are factored in, show a significant drop in the overall footprint.

Fleet performance is likely to have improved significantly given the changes to the stock when compared to the baseline. However, this element of the carbon footprint requires review with improvements to the information being captured.

Total Carbon Emissions from Corporate Assets Gas and Electricity (tCO₂)



Overall Real Carbon Emissions from All Gas and Electricity (tCO₂)



Priorities for 2022-23

Introduction

The progress report has facilitated the identification of several areas of the Plan that require prioritisation. The objectives will continue to be reviewed and business as usual operations will be recorded and reported against. However, it is prudent to reflect on the challenges that have emerged from this progress report to provide focus for the next reporting cycle.

It is recognised that significant progress against the objectives has already been identified within services, for example around waste management, procurement and reducing emissions in buildings. This work should continue at pace regardless of whether they are not specifically referenced in the following prioritisation list for the 22/23 reporting cycle.

Asset Identification and carbon auditing of building stock

The Council has a range of building assets and work is ongoing to identify those that will still be in use in the long term and those that might be disposed of. Identification of the key carbon producing assets to be retained should be prioritised.

Once this is complete, work to assess carbon reduction interventions should commence through building audits and targeted actions. Implementation of the identified actions should then be delivered to meet the carbon neutral objectives.

Gas

The switch to automatic monitor readings has allowed for a more accurate understanding of gas consumption. This has revealed a higher level of emissions associated with gas than originally planned for.

Emissions from gas are more complicated to reduce. Firstly, unlike grid supply of electricity, there are limited interventions that will reduce emissions at source; electricity produced from a wind farm is cleaner than from a coal fired power station; gas is delivered to a building and utilised in whatever system is in operation. Secondly, large scale reduction requires investment in more costly infrastructure whereas electricity can be reduced readily through behaviour changes or supplemental energy produce i.e. roof mounted solar panels.

The Civic Centre is a significant part of the gas consumption and work is ongoing to secure funding from the Public Sector Decarbonisation workstream to identify

opportunities to improve the performance. To support this, work should be undertaken to audit the Civic Centre and consider opportunities for improving the infrastructure as a priority as lead in times for large scale infrastructure changes are likely to be relatively longer for a building of such scale.

Further work on identifying other key gas consumers is also to be prioritised. Contact with these properties should be considered a first action in this work to ensure building management is appropriate and effective and to ensure quick wins can be realised i.e. ensuring that heating controls are appropriately set. Further work on the identification of infrastructure solutions should then follow.

Fleet

The carbon footprint associated with the Council's transportation is not sufficiently accurate. Work needs to be prioritised to enable the Council to accurately capture the carbon footprint associated with all its vehicles' movements. The baseline work to understand the makeup of the fleet has been undertaken but the next step is to determine how many miles are completed by each vehicle and what carbon factors are to be used in determining the associated emissions.

Carbon Offsetting – Solar Projects

The information in relation to gas is likely to result in a slightly higher residual carbon footprint by 2030. It was acknowledged in the plan that there will still be a carbon footprint associated with Council operations. This is because there is no ready alternative to gas consumption, and it is likely that gas boilers will still be a prevalent form of heating (space and water). Similarly, it is unlikely that all vehicles will be electric by 2030 due to cost constraints and market availability.

The Plan accepts the need for carbon offsetting to allow emissions to be saved elsewhere. Solar projects will allow for clean electricity to be transferred back into the national grid which offsets the residual emissions in the Council's footprint.

Solar projects will invariably need to go through the planning system and there will be a lead in time to identify sites, secure planning permissions and grid connections. The sooner these projects come online, the more value they will have in offsetting the residual emissions.

Carbon Offsetting – Tree Planting

The Council has embarked on a significant tree planting regime which included nearly 12,000 within this reporting cycle. This is in addition to those secured by developers through new development schemes and it does not factor in the work to protect and enhance existing woodlands and tree coverage.

Notwithstanding that, trees have very little value as a carbon sink until semi maturity (10+ years). As they mature, large scale tree planting can have a huge impact on carbon emissions

The recent Trees for Cities planting work revealed the 18,000 trees (over two reporting cycles, 21/22 and 22/23) would save approximately 30 tCO₂ by 2030. But this would rise significantly in the years to follow.

Planting on a much larger scale would be required to have a meaningful impact on any residual emissions by 2030 for example, it is estimated that 50 hectares of new planting would equate to a saving of 166tCO₂ by 2030. However, that 50 hectares would result in approximately 6000tCO₂ in the subsequent 20 years.

A priority for 22/23 is therefore to understand how much land can be put aside for additional tree planting to assist with carbon offsetting from 2030. Work should also be undertaken to understand the current carbon sequestration associated with the Council's green and open spaces.

Climate Change Adaptation

Recent heatwaves, droughts and floods have all heightened awareness of the need to be more resilient to the impacts of climate change.

The need for an adaptation action plan was set out in the main Plan and work to scope the coverage of this needs to be prioritised for 22/23 with a plan to be delivered in early 23/24.

Improved carbon reporting

The Council has committed to ensuring that its own carbon footprint is made available for scrutiny to satisfy aims of being transparent. This can only be done once there is a consistent capturing, recording and reporting of the carbon footprint.

Work to rationalise and reconcile the carbon information needs to be prioritised with the subsequent data made available publicly.

Programming of Work

The Plan includes a number of objectives and action plans. These broadly capture existing workstreams but puts them in the context of the climate emergency. The first stage of the Plan was to create the internal governance to deliver the change required and to get the Council on the right footing to deliver against the commitments. A key priority for 22/23 is now to provide a clear programme with target dates for delivering the requirements of the plan.

Embedding the Plan in the Council Strategy and Service Plans

The Council has recently produced a new Strategy which is currently out for consultation. This reflects the climate emergency and this Plan. However, the next step is to identify and detail the work to be undertaken by the individual services to meet the objectives of the Plan. Each objective and action plan should have a home in a Service Plan.

Engagement with Communities, Schools and Businesses

The Council has committed to using its unique position to be a champion for carbon reduction across the borough. Although many of these emissions are outside the scope of the Plan's targets, the Council can have a positive influence on others to seek their own reduction plans.

Council maintained Schools will be targeted specifically for carbon reduction action next year with work already underway. However more work is required to reach community groups, schools outside the Council's control and businesses.

The Plan requires a separate engagement strategy to be drawn up and the priority for 22/23 would be to develop the scope of this and ideally reach a position where it can be implemented. This will also address the Council Motion of November 2021 to proactively engage young people and ensuring residents and relevant organisations are able to shape the climate change action plan ahead of the 2024 review.

2035 Carbon Neutrality

To commence progress on understanding the carbon footprint from Council's procured services (scope 3 emissions) and to investigate low carbon procurement frameworks. This is required to meet the motion set out in November 2021 for ensuring, where practical and cost effective, all the Council's procured services are net carbon zero by 2035.

Review of Actions

C1	Community Leadership				
C1.1	Align our service delivery to support and promote zero carbon community outcomes.		The Council Strategy is out for Consultation and commits to a green and sustainable borough. The individual service plans will need to demonstrate how they will meet this objective.		
C1.2	By the end of 2021 we will have a dedicated online learning resource to provide detailed advice and guidance on how to measure and reduce a carbon footprint.		The website (https://www.hillingdon.gov.uk/article/8619/Reducing-your-carbon-footprint) is active		
C1.3	To use our unique access to communities through, for example residents associations, to support community forums and groups in developing the councils climate actions.		A priority for 2022/23 is to advance the engagement Action Plans to demonstrate progress against this objective.		
C1.4	Devise strategies to improve existing buildings, with access to government funding for energy efficiency and decarbonisation of residential properties and businesses.		Council officers have secured funds through the Social Housing Decarbonisation Fund (SHDF) with wave 2 priorities for 22/23. Wave 3b of the Public Sector Decarbonisation Scheme (PSDS) is being advanced for 22/23 for corporate buildings.		
C1.5	To use our unique access to businesses to set up a borough wide Climate Change forum to develop ideas collectively and to collaboratively work towards achieving climate change objectives.		Covid has had a significant bearing on businesses with further threats from cost of living rises, fuel prices and energy supplies. The forum is considered a priority for 23/24.		
C1.6	We will prioritise actions for fuel poor and vulnerable households, needing assistance with accessing grant funds		The Council has provided additional assistance to fuel poverty households in its control. Bids for funds to improve social housing stock will continue into 22/23		

	to improve energy efficiency and reduce their energy costs.	
C1.7	By 2023 for all our managed schools and educational facilities to have their own Climate Action Plans in place with our support and assistance on how to unlock opportunities for low and zero carbon technology.	Ongoing with work already identified for 22/23 to engage and secure plans for each school
C1.8	During 2021, for all non-Hillingdon managed schools and educational facilities to be contacted and encouraged to put their own Climate Action Plans in place by 2023.	Due to the Covid pandemic it was considered 2021 was not a prudent timeframe. This work is being prioritised for end of 22/23 alongside the actions for Council controlled schools.
C1.9	To provide a dedicated online resource that is aimed specifically at children. To complement this with an annual schools climate action competition, to support learning and development in schools, offer opportunities to see real world examples of action being taken to tackle climate change and to identify 'young climate champions.'	This activity forms part of the community engagement priority for 22/23
C1.10	To develop a schools engagement strategy to promote and encourage positive climate and environment action in accordance with the objectives and commitments in this plan.	To form part of the schools engagement work to be commenced in 22/23
C1.11	To support, promote and raise awareness of the use of sustainable transportation and ensure resources are available to allow communities to make transport changes that do not rely on polluting private transportation	The Council continues to promote electric vehicle charging through planning submissions and other operations. Further work with TFL is ongoing to promote and support additional bus routes and cycleways

C1.12	To provide a dedicated online resource to provide information on how to reduce a carbon footprint, where to access external funding (i.e. Government grants), information on what to do in a property, and how to improve an individual's environmental footprint. The online resource will also be a tool for providing examples, case studies and good news stories as examples for others to follow.	The online resource is available. It will be routinely updated and improved through the course of the plan.
C1.13	By the end of 2021 to develop and implement an annual engagement strategy that covers all interested stakeholders (e.g. residents, resident groups and associations, community groups, environmental bodies (i.e. Sustrans, Friends of the Earth and businesses).	Due to Covid this work is now prioritised for 2022/23.
C1.14	To promote and support volunteer groups with dedicated climate and environmental objectives.	A priority for 2022/23 is to advance the engagement Action Plans to demonstrate progress against this objective.
C2	The Council's Own Operations	
C2.1	All our operational assets under our direct operational control and financial management will be accredited as carbon neutral by 2030. Other assets we own but not under our control will be decarbonised in line with prevailing legislation and, go even further with the availability of additional funding.	Ongoing – see progress section. Work has been positive with a priority for 22/23 to produce a report that provides a roadmap to fulfilling the 2030 target.

C2.2	By 2030, our fleet will be powered by the cleanest available technology available within budget constraints and suitable for the operational requirement.	Ongoing – see progress section. Work has been positive but challenges remain around availability of cleaner vehicles and the cost constraints associated.
C2.3	Ensure all corporate plans and strategies, particularly regarding estate management and property disposal evaluate and mitigate for climate impacts.	The Council strategy is out for consultation. This reflects the need for a green and sustainable borough. Subsequent service plans are expected to demonstrate compliance with this aspirations of this Plan.
C2.4	We will introduce a green staff travel plan that encourages and promotes less business travel and commuting and the increased use of low or zero carbon travel methods.	Business transformation will consider the scope and working patterns across the Council following the Covid pandemic. This work will factor in the climate aspirations. Once complete, the green staff travel plan will be developed.
C2.5	Undertake feasibility studies and act to install small scale low and zero carbon technologies in our own building stock.	This work is already underway with opportunities being considered with progress on identification and implementation to be reported in the next reporting cycle.
C2.6	The procurement of all our new equipment and services will be measured against the objectives of this strategic plan.	A separate charter for procurement of items and services that reflect the aspirations of the Council is being presented to Cabinet in summer 2022.
C2.7	To ensure our street lighting assets are targeted for further carbon reductions, using new low energy and renewable technologies.	See progress section. Postive work has been undertaken with a 30% saving in carbon from the recorded 19/20 baseline. Further progress is expected over the plan period.
C3	Building Better Places	
C3.1	To use the development plan system to ensure all new major development will be zero carbon.	This is ongoing with all approved new major developments securing zero carbon status in 21/22.

C3.2	To consider new planning policies to ensure all non major new development is also zero carbon.	This can only be achieved through changes to the Local Plan which is currently in early stages of preparation.
C3.3	To ensure no new development is built in high and medium flood risk areas unless absolutely necessary and only then when flood risk management is properly understood and mitigated in accordance with council flood policy.	Ongoing. Notable success through the opposition to a new residential scheme at 217 High Street Yiewsley which the Council refused as it would have sited nearly 150 residential units and a health centre in areas at risk of flooding. The Council won the subsequent appeal following a public inquiry.
C3.4	To ensure all new development is environmentally responsible, including protecting existing designations and sites of interest.	Ongoing. This is secured through the application of planning policies.
C3.5	To ensure all new development contributes and supports the goal of sustainable transportation, such as the promotion of public transport, cycling or EV charging.	Ongoing. All new major development has to contribute EV charging points both active and passive (i.e. available to be installed in the future).
C3.6	To ensure that wherever possible during development, existing trees are retained. Where they cannot be retained, new trees should be planted to facilitate carbon gain.	Ongoing. New planning policies regarding 'biodiversity net gain' are expected in '2023'. This will provide further protection to the enhancement of tree canopy and other green measures.
C3.7	To identify and promote opportunities for the increased provision of allotments.	Review of corporate landholdings is underway and opportunities for enhancement of allotment provision will follow. Expected progress report in 2023/24

C4	Using and Producing Clean and Green Energy			
C4.1	To ensure and certify that the Council secures energy supplies from low or clean forms of generation by 2030.	Over half the Council's electricity is certified from renewable energy sources.		
C4.2	To investigate opportunities for large scale electricity generation from Council owned land (e.g. solar farms).	Opportunities are currently being explored with a progress report expected for the next reporting cycle.		
C5	Waste Management			
C5.1	Lead by example with a clear waste collection and sorting strategy for the Council's own operations with year on year targets for improvements.	The Council is leading the way across West London with regards to waste management in accordance with the waste hierarchy (reduce, reuse, recycle).		
C5.2	Support the West London Waste Authority on waste reduction campaigns.	The Council is an integral part of the West London Waste Authority and continues to support waste reduction campaigns.		
C5.3	Provide an online resource for educational facilities to develop and implement waste reduction strategies. Monitor, record, and report on progress.	Ongoing. Work identified for 22/23 includes an engagement campaign to raise awareness for waste reduction and improved management.		
C5.4	Work with businesses to reduce waste productivity and to provide more opportunities to customers to reduce and recycle their waste.	Ongoing with waste awareness campaigns scheduled for 22/23.		
C5.5	Encourage and support residents and communities to avoid, reduce, reuse, and recycle waste in that order.	Ongoing. Work identified for 22/23 includes an engagement campaign to raise awareness for waste reduction and improved management.		

C5.6	Develop a community campaign to manage waste more sustainability and explore the potential to lead or support reuse and repair workshops for residents.	Ongoing. Work identified for 22/23 includes an engagement campaign to raise awareness for waste reduction and improved management.
C5.7	Promote the importance and value of growing food, either individually or through community groups.	Ongoing. Work identified for 22/23 includes an engagement campaign to raise awareness for waste reduction and improved management.
C5.8	To ensure all waste is managed sustainably and there is transparency and information on processes the Council utilises and destination of waste.	Ongoing. Waste reporting is a statutory function.
C6	Climate Change Adaptation and Mitigation	
C6.1	To develop a climate change adaptation and mitigation action plan.	Expected priority for 23/24
C6.2	To put in place a water efficiency strategy for all Council operations (such as green space watering, depot operations and corporate buildings) then monitor, record and report year on year savings.	Expected priority for 23/24
C6.3	To ensure the Council's flood resilience and management work incorporates a changing climate and that the Council's own land and property decisions consider the need to make space for water.	The flood resilience work will be integrated into the adaptation and mitigation strategy. However, opportunities are being realised where identified in advance for example utilising green space land at Bessingby Park to alleviate flooding on neighbouring residents.
C6.4	To run a campaign to get residents involved and sharing ideas with the council to find solutions for climate mitigation and adaptation in the community.	To be integrated into the adaptation and mitigation action plan and to secure feedback through the engagement plans to be prioritised for 22/23

C7	Carbon Offsetting			
C7.1	To develop an offset strategy to develop local solutions to any remaining residual carbon emissions from council operations.	Expected priority for 23/24 to bring together tree planting and green space management workstreams and work being undertaken to identify opportunities for large scale energy production. However, work on offsetting has already begun with the planting nearly 12,000 trees in this reporting cycle.		
C7.2	To develop a tree and green space management strategy that supports and accounts for the offsetting objectives and commitments.	A review of green space management is currently underway which will inform the publication of a management strategy in the 23/24 reporting cycle.		
C7.3	To promote carbon reduction practices and carbon offsetting opportunities for businesses and communities, linked to measures to tackle climate change in Hillingdon.	To be integrated into the engagement work with businesses and communities (priority for 22/23)		
C7.4	Understand and increase current carbon sequestration through increased planting and changes to green space management.	Nearly 12,000 trees planted in this reporting cycle. Further tree planting expected in winter 2022. Bids to access Woodland Trust tree planting funds have also been made.		
C7.5	Increase the number of trees, particularly in urban areas to complement objectives to improve air quality and promote urban wildlife.	Green screens around amenity space and in areas with poor air quality have also been constructed. Tree planting in was carried out across the winter in 2021. Further opportunities are being explored with confirmed funding from Trees for Cities for winter 2022.		

C7.6	To exploit opportunities to increase carbon sequestration to maximise opportunities for biodiversity and flood risk management	Large woodland planting around Yeading fields is considered to have significant biodiversity benefits. Further opportunities to be explored as part of the adaptation and mitigation plans.
C8	Sustainable Transportation	
C8.1	Produce a sustainable transportation strategy that reflects the objectives and commitments in this strategy.	The Council has a Local Implementation Plan which constitutes the sustainable transport strategy. Further work is ongoing to develop a cycle and walking strategy and TFL are being actively encouraged to improve their public transport plans for the Borough.
C8.2	Work with TFL to improve bus connectivity and services.	The Council successfully secured the new 278 bus route (north to south) in the Borough and work continues to improve the public transportation offer by TFL.
C8.3	Identify opportunities for improved cycleways, cycle paths and public rights of way.	New rights of way have been secured in the north as part of the HS2 restoration of land. Options for an improved cycle link from Heathrow Villages to Uxbridge are being considered.
C8.4	To promote cycling opportunities through campaigns and awareness events.	The Council is leading on the initiative, supported by cycle instructors, called Bikespiration which has recently been re-established There is a strong online presence for Hillingdon and cycling with aspiration to run further Dr Bike (bike repair) workshops.
C8.5	To secure improved cycling facilities across the borough.	Improved facilities are being delivered as part of new planning development and to extend the Santander Bike Hire scheme further across the Borough.

C8.6	To develop an electric vehicle charging action plan that will commit to increasing the availability of electric charging points across the borough.	A priority of 23/24 with work already ongoing to secure the provision of new infrastructure.
C8.7	To ensure the Council's Air Quality Action Plan aligns with the objectives in this plan to ensure a safe transition to increased levels of cycling and walking in urban areas.	Ongoing. The Council's air quality action plan is intrinsically linked to the Local Implementation Plan with opportunities to identify joint benefits with transport improvements that aim to improve air quality.
C9	Transparency, Communication and Reporting	
C9.1	To ensure transparency in the Council's measuring of carbon footprints with clear details on methodologies as well as the outputs. All details to be available online.	Ongoing. As stated in this report work is progressing to fully capture the complex carbon footprint of Council operations. Once complete, this will be published alongside this update on the Council's webpages.
C9.2	To undertake an annual review and progress report on all action identified in this strategy.	This report
C9.3	In July 2024, undertake a review of this strategy which will be open to public consultation and engagement	2024/25 priority
C9.4	To develop and undertake a sustainability appraisal of each of the action plans to ensure they are aligned to the objectives of this plan.	To be completed with each action plan produced in accordance with this Plan.
C9.5	Provide a climate action plan programme detailing target dates for the development of supporting action plans.	Priority for 22/23

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APPENDIX 2 - Climate Commitment Charter: Partnering with our Suppliers to reduce our carbon impacts

Statement

The eight local authorities in West London – Brent, Ealing, Hammersmith & Fulham, Harrow, Hillingdon, Hounslow, Richmond upon Thames, and Wandsworth – and West London Waste (the West London Authorities) have set out our ambitions to become net zero authorities in all that we do.

We cannot deliver this alone and look to our stakeholders, especially our supply chain to help meet these targets and join us on this journey. Therefore, to support us in that aim, we need you as our suppliers and contractors to play your part in reducing both your carbon emissions in total and more specifically in the products and services you provide to us.

By committing to this Charter, we invite your organisation to join us in collectively tackling the climate emergency and to set out the actions you will take to reduce your organisation's carbon emissions.

Commitment by You, the supplier

By signing this Charter, You, the supplier, commit to supporting any of West London Authorities with whom you work on initiatives to tackle climate change. This is to reduce the greenhouse emissions related to the manufacture, delivery and operation of your products and services. It includes initiatives and technology, such as, the following that will depend on the nature of the goods and services procured: -

- Seeking alternative, lower carbon sources of power
- Improving energy efficiency of equipment
- Improving the air quality emissions from plant and vehicles
- Providing alternative transport methods
- Reducing the impact on the environment, improving it where possible, through enhanced biodiversity and the use of sustainably sourced materials
- Designing for circularity to reduce the use of virgin materials and encourage reuse and recycling to minimise waste.
- Delivering other co-benefits that arise from a transition to low carbon and sustainable lifestyles and working practices, including improved health and wellbeing outcomes
- Communicating the same sustainability intentions through *your* procurement process with *your* suppliers

All suppliers are expected to work towards the following actions and outcomes for mitigating and adapting to climate change:

- In providing, goods, works and services to ensure climate resilience, the lowest possible whole life carbon impacts, and deliver year-on-year improvements in carbon and energy intensity
- A strategy to measure, monitor and reduce your organisation's carbon footprint in line with climate science and working towards net zero

- Provide accurate data to help us disclose our greenhouse gas emissions in a clear and transparent way
- Devise and offer innovative solutions that support our journey to achieve net zero carbon
- Develop and implement a carbon reduction plan that is aligned to climate science.

As part of this we would like to gather information on your plans and implementation for carbon reduction:

1. *Do you currently measure your organisational greenhouse gas emissions? Yes/No. If so, does this include Scope 3 (your supply chain) emissions? Yes/No.*
2. *Do you, as our supplier, currently have a strategy to reduce your organisation's carbon footprint in line with climate science and working towards net zero? Response: Yes/No/In development.*
3. *If Yes, what is the date for achieving net zero? Response:*

Our commitment

We will work closely with our supply chain to deliver lasting sustainable benefits. In practice this means we will:

- Be accountable for our own impacts on society, the economy and the environment
- Be transparent in those decisions and activities that impact the environment, society and the economy
- Behave ethically and promote ethical behaviour throughout our supply chains
- Respect, consider and respond to the interests of stakeholders impacted by its procurement activities
- Buy only what is needed and seek more sustainable alternatives
- Ensure that sustainability is integrated into all existing procurement practices to maximise sustainable outcomes
- Work towards continually improving our sustainability practices and outcomes, and encouraging organisations in our supply chains to do the same

We very much hope you will want to work with us to be ambitious for our environment for generations to come. Please pledge your support for this important collaboration to prevent the worst effect of climate change.

I/We will use reasonable endeavours when tendering for contracts and throughout the contract term to become more efficient in our ways of delivering the contract to support the above aims and initiatives, working closely with the West London Authorities and reporting back the achievements.

[Signed once by Senior Representatives of each Borough Authority]

Signed on behalf of the Supplier [senior Manager or Director]

Name:

Position:

Date:

SUCCESSFUL, SUSTAINABLE, VIABLE SCHOOLS: INFANT & JUNIOR AMALGAMATION POLICY

Cabinet Member(s)	Councillor Susan O'Brien
Cabinet Portfolio(s)	Cabinet Member for Children, Families & Education
Officer Contact(s)	Nav Minhas – Education & SEND Directorate
Papers with report	Appendix 1 - Amalgamation Policy Appendix 2 - Consultation Responses

HEADLINES

Summary	Cabinet is asked to consider the outcome of the consultation undertaken on the draft 'Successful, Sustainable, Viable Schools: Infant & Junior Amalgamation Policy' and consider approving the Policy for implementation.
Putting our Residents First	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.</i>
Financial Cost	There are likely to be cost efficiency savings arising from any amalgamations of Infant and Junior schools within the Dedicated Schools Budget.
Relevant Select Committee	Children, Families and Education Select Committee
Wards	All

RECOMMENDATION

That Cabinet consider the responses to the consultation received on the draft Successful, Sustainable, Viable Schools: Infant & Junior Amalgamation Policy and approve this as Council policy.

Reasons for recommendation

To consider approval of the draft Infant and Junior School Amalgamation Policy, following consultation, as set out in Appendix 1. This report strengthens the previously agreed Cabinet decision in March 2009 to adopt a policy on amalgamation.

It is generally considered by the Local Authority (LA) that the amalgamation of linked Infant and Junior schools is a positive way to develop and progress school organisation. The LA recognises that the education landscape is ever-changing and this needs to be taken into account along with the circumstances of individual schools.

Hillingdon schools aim to provide a high-quality education offer to pupils and strive constantly to raise the standard of education. All schools are committed to working collaboratively, in partnership with all stakeholders and with a strong focus on developing extended service provision for their local communities.

Current financial pressures and increased costs impact all schools. Smaller schools can be disproportionately affected by budget pressures as they have a higher proportion of fixed central and staffing costs. As school rolls have declined in recent years from a high peak, some schools now have more than one class of under 25 pupils – the level that assures financial viability per class. Several schools in the Borough have one or more-year groups with a class less than the Published Admissions Number (PAN), and schools therefore need to be more flexible and resilient in staffing. Currently, most of the three and four form entry separate infant and junior schools have a total roll below 420, that of a full two form entry primary school.

The application of the policy would also seek to raise educational standards and strengthen outcomes for pupils by ensuring continuity and alignment of the curriculum across the Foundation Stage, Key Stage 1 and Key Stage 2.

As of September 2022, the Local Authority had 46 Primary / Infant / Junior maintained schools made up of 26 Primary schools and 20 Infant/Junior schools.

Democratic compliance / previous authority

This report strengthens the previously agreed Cabinet decision in March 2009 to adopt a policy on amalgamation.

SUPPORTING INFORMATION

Reasons for Amalgamation

The principal objectives of amalgamating Infant and Junior schools are to provide a continuous primary education across the Key Stages and provide a unified management structure within a single school ethos, making more effective and efficient use of resources. Primary schools have leadership and specialist teachers reflecting both the phases and subject specialisms. When a pair of schools consider the timing is right, the schools and LA will prepare detailed consultation for staff and parents on the issues for their proposed new combined school. Some potential benefits of amalgamation are detailed below.

Financial savings

Proposals for amalgamation would not be driven by the potential for financial savings, but they are a key consideration, since it is clear that in real terms, the budgets of schools will continue to be under great pressure. The LA is not encouraging redundancies but wants schools to be proactive in planning and responding to the opportunity of future staff vacancies, and to start to share some posts ahead of amalgamation. The potential for financial savings may come from sharing one headteacher and central office staff, revised leadership and staffing structures, economies of scale, a unified purchase point for goods and services and reduced building running costs. Most of the LA's all-through primary schools are 3FE and are successful at each key stage. Any efficiency savings achieved through amalgamations forms part of the ring-fenced Dedicated Schools Grant and are therefore re-distributed through the formula across all schools. These savings are not, therefore, retained by the Council. In terms of the amalgamated school, improved efficiency can offset any budget reductions in formulaic allocations, potentially resulting in an improved financial position for the school.

School organisation, management & resources

Continuity and progression of learning between the ages of 5 and 11: research shows that for some children, transitions in education (such as moving from nursery to primary school or from primary to secondary school) can be unsettling. Reducing the number of changes for children in a school system can strengthen continuity and progression for children and families in the primary phase, both in terms of the curriculum and pastoral experience. Amalgamation would remove the school transfer process at the end of Key Stage 1.

Consistency of approaches to inclusion and wellbeing: the continuity of schooling between Key Stages 1 and 2 can lead to a more cohesive approach to Special Educational Needs support and a faster diagnosis of need that children may have in the school environment. As there would be no transition from one school to another, pupils' need to adapt to new approaches and policies would be removed. It would provide the opportunity for strengthened 'tracking' of pupils' learning and achievement, with continuity of approaches to teaching and learning.

Efficient use of human and educational resources: an amalgamated primary school would ensure consistent leadership and management across Key Stages and encourage continuity between the Key Stages by adopting common schemes of work and approaches from Reception to Year 6. There would be one management system, one financial system, one governing body, one single point of communication for families, and efficiencies could be achieved through economies of scale and removal of duplicated services.

It should be noted that Infant and Junior schools are generally not eligible to apply for Department for Education related leadership schemes such as Teaching School Hubs, due to their small size and infrastructure. Primary schools therefore receive more support than Infant and Junior schools, which strengthens the argument for the benefit of shared access to resources.

There could be more efficient and effective use of resources, especially accommodation, for example, when numbers fluctuate across the Infant and Junior phases.

Headteacher / staff / governor recruitment

The general difficulty of recruiting headteachers is often heightened when separate Infant and Junior schools advertise for a new headteacher, as salaries tend to be lower than for combined primary schools and career progression opportunities arguably more limited. This also applies to teaching staff in general. The LA has found it increasingly difficult to recruit to headteacher posts, leading to unnecessarily long interim arrangements due to lack of interest and / or quality of applicants. Similar problems are experienced in recruiting to governing bodies where a significant number of vacancies exist.

Parental / family involvement

More effective relationships develop with parents/carers and schools with continuity in education across the Primary phase. Research shows that parental support is a major contributor to children's achievement. Amalgamation provides opportunities for effective and longer-term relationships with children, parents/carers and teachers by building on relationships that may have already been established in nursery/reception. For younger children, the presence of older children can also provide aspirational role models and mentoring support.

Co-ordination: amalgamation could provide opportunities for co-ordinated staff training days, open evenings, and school start and finish times, which would assist families in dropping off and picking up children who are in different Key Stages.

End of Key Stage 1 Assessments

2023 is the last year of the KS1 statutory assessments (SATS). Schools will now be measured from Reception Baseline Assessments to end of Key Stage 2 to track Primary pupils from Reception to Year 6. Infant and Junior Schools will find it difficult to be in alignment with the DfE data outcome requirements due to this gap for end of Year 2 and the start of Year 3.

Curriculum delivery

Unified leadership and management of teaching: a unified organisational structure should enable planning for the whole primary phase Curriculum Key Stages, as well as providing greater flexibility across, and between, the Key Stages. This benefits more able pupils to extend their learning and also those who need more catch-up or support in some subjects – that the hard split is softened and there will be continuity and progression of teaching and learning.

Workforce issues

An enhanced range of staff expertise: teachers and other staff would have access to the whole primary curriculum. This could support and inform whole school planning, assessment, pastoral systems, etc., and provide opportunities for wider staff development and experience across the full primary phase.

School Ethos

A single vision and consistent ethos, to benefit pupils, staff and parents/carers:

Whilst separate schools may have their own identity and ethos, amalgamation can provide an opportunity to create a whole new school ethos taking the best parts and practices from the separate schools.

Educational standards

It is possible to find statistical evidence to show either increased or decreased standards following any major change at schools. It is widely accepted that the key to success following any major organisational change, whether in schools or any other organisation, is how such a change is effectively managed and the quality and commitment of the staff.

The impact on education improvement for those schools in Hillingdon that have amalgamated in the past substantiates the evidence about combined schools. Prior to the four amalgamations in 2021-22 of Lady Bankes Infant & Nursery and Junior Schools and Oak Farm Infant & Nursery and Junior Schools, the previous set of schools to amalgamate were the Breakspear Infant and Nursery School and Breakspear Junior School, which closed on 31 August 2013 and amalgamated to become The Breakspear School.

Reasons for not amalgamating

The Local Authority recognises that there are some arguments against amalgamation and significant anxiety about the change and transition impacting on pupils and staff. Some of the most common reasons are:

- Educational benefits might, under some circumstances, be achieved by more effective communication and working together of staff and governing bodies in smaller, separate schools. It is noted that there are two cases where the junior school has joined a MAT limit options for those infant schools.
- A hard federation or both schools joining the same MAT could achieve similar benefits.
- The larger size of a combined school could raise issues about the changed role of the headteacher who, as a consequence of the size of the school, might be seen as more remote to parents/carers.
- There could be disruption to pupils. However, the aim would be to achieve amalgamation with as little disruption as possible to pupils. The merging of the schools could be managed over time by the senior staff and governing body of the school. Generally it is envisaged that most teachers would continue to teach the year groups as before and Infant and Junior pupils would each continue to be taught in the buildings built and adapted for them, and the playgrounds.
- Site specific issues such as separate school buildings, which might make it difficult for children and staff to move easily between buildings for lessons or assemblies.

Governance

A single governing body can provide strategic governance and vision for all primary key stages and be accountable for outcomes across the school phases.

Financial Implications

- The amalgamation of Infant and Junior schools should result in savings being achieved through a rationalisation of resources and through economies of scale by combining operations and streamlining the procurement of services.
- Combined schools sharing the same site are able to maximise the efficiency of their resources.
- A combined school staffing structure removes duplication and support functions can be consolidated across the single school. This has a positive impact on the budget.
- In situations where pupil numbers are changing, discussions with a combined single school on a site has potential to offer more flexibility and opportunity to improve the accommodation and site usage.
- The amalgamation of the schools will allow for a pooling of asset related revenue budgets, and the ability to manage property costs over both buildings, which will support a better maintenance regime.

Responsibility of the Local Authority

The Local Authority has the power to close community schools or to require them to amalgamate but this policy is not intending to force amalgamation unless circumstances change, and the benefits would be a stronger, improved, viable school. The local authority would like to work collaboratively with the schools and seek formal approval of the Cabinet Member if no objections are received, on a case by case basis.

Amalgamation involves making changes to the organisation of schools. This is governed by statutory processes that are detailed in [DfE Guidance: Opening and closing maintained schools – Statutory guidance for proposers and decision-makers November 2019 and Making significant changes \('prescribed alterations'\) to maintained schools -Statutory guidance for proposers and decision-makers.](#)

RESIDENT BENEFIT & CONSULTATION

Consultation on the draft Policy

The consultation policy document was available from Wednesday 18th May 2022 to Friday 17th June 2022 on the consultation page of the Hillingdon Council website. This included a brief outline of the proposed changes, the full proposal and an online questionnaire to obtain feedback. The questionnaire sought support or otherwise from the key sections of the proposed Policy document as attached in Appendix 1.

The consultation was shared with all 99 schools within Hillingdon, including academies and maintained schools via the weekly communication from education@hillingdon.gov.uk. From this request to Headteachers, SLT, staff and Governors (700 governors from maintained schools) to

take this opportunity to review and comment on the policy, the LA received the following responses:

Consultation Responses (set out in full in Appendix 2)

Appendix 2 details the full responses received by each section of the policy. This report seeks to address the responses, in terms of the broader rationale for amalgamation.

In total 60 responses were received during the consultation period and 1 respondent did not complete any of the questions. Whilst the consultation was sent to all schools, Cabinet should note that the overwhelming majority of the respondents were from Infant and Junior Schools.

Most of these responses were from staff, governors and parents who referred to their own school very positively, believing at the current time there were not sufficient concerns to make a change that would be beneficial. A few noted the school had experienced difficulties on one or more of the key issues in the past but had recovered; educational achievements, budget deficit, problems recruiting.

Responses are summarised below in terms of support or otherwise for the key sections of the policy:

Support for the key sections of the policy	Yes (support)	No (do not support)	Don't Know	Other	Subtotal	No response	Grand Total
Introduction	18	34	3	2	57	3	60
The Educational Case for Amalgamation	15	39	1	4	59	1	60
Governance and Leadership	21	31	5	2	59	1	60
Parents Views	16	34	6	3	59	1	60
Financial Implications	18	33	6	2	59	1	60
The Policy	19	32	5	3	59	1	60
Implementation	20	32	5	2	59	1	60

Officers have taken into consideration all comments made as part of the consultation and have reviewed the policy accordingly.

Conclusion

Whilst a majority of respondents did not support the key sections of the Policy, this again seemed to be due to staff, governors and parents believing that currently there were not sufficient concerns to make a change that would be beneficial to their individual school.

Amalgamation provides opportunities both to achieve greater integration across the key stages to enhance the continuity of education and better value for money and resources spent in classrooms. The well-being of all children and staff would be a major consideration throughout any process of amalgamation.

With regard to size, the Local Authority considers that schools amalgamated up to 4 forms of entry in size are all manageable and are not too large. As of September 2022, there will be 24

primary schools of 3 forms of entry in Hillingdon (plus 1 primary school of 5 form of entry which is reducing to 4 form entry in 2023).

On balance, the Local Authority considers that the overall benefits of amalgamation outweigh the reasons for maintaining the status quo. Therefore, where circumstances permit, any opportunity for amalgamating Infant and Junior schools should be vigorously pursued.

Amalgamation provides an opportunity to attract high quality headteachers and teaching staff to Hillingdon and provide more effective governance.

Further consultation required

The LA would like to re-iterate that any decision to pursue a school amalgamation would only be made on a case-by-case basis and would be the first step in the statutory consultation process following any of the triggers being met as per the policy for making prescribed alterations to schools. This step would be followed by detailed consultation with all key stakeholders, the publication of firm proposals (if appropriate) and a subsequent decision to be taken by the Council. The key stakeholders to be consulted about any specific school amalgamation proposals would include the school governing bodies, staff, trade unions, parents, Ward Councillors, neighbouring LAs and any other person or body likely to be affected by such proposals.

CORPORATE CONSIDERATIONS

Corporate Finance

As stated in the financial implications above, there are likely to be cost efficiency savings arising from amalgamations of Infant and Junior schools, provided that management processes change to reflect the changed operational environment of the amalgamated school. These savings may either be for the benefit of the amalgamated school or for schools in general, depending on any consequential impact on the local schools funding formula, as all such savings would be retained within the ring-fenced schools budget funded by the Dedicated Schools Grant.

In addition, it is expected that the individual school's accumulated balances and reserves would be merged, providing additional financial flexibility to the amalgamated school.

However, the benefit of any efficiencies and flexibility that might be generated through amalgamation will vary depending on the particular circumstances of the schools in question, and these benefits and costs will be assessed as part of the evaluation of each amalgamation proposal that is investigated under the proposed policy.

Legal

The recommendation contained in this report only establishes a Council policy to consider amalgamating Infant and Junior schools. Any subsequent decision to consider amalgamating specific Infant and Junior schools would need to follow the statutory legal process introduced by the Education and Inspections Act 2006 for making prescribed alterations to schools. There is no definitive single legal process for bringing two schools together in an amalgamation. Therefore, as well as considering whether any schools should be brought together, any consultation would

also need to explore which of three available options is the best way to make a prescribed change. The three options are:

- Close an Infant school and expand the Junior school to the full primary age range;
- Close a Junior school and expand the Infant school to the full primary age range; and
- Close both schools and open a new school for the full primary age range.

Infrastructure / Asset Management

Amalgamation of infants and junior schools into one organisation under the banner of a 'primary school' could lead to asset reorganisation and possibly identify unwanted or underused parts of school sites. For example, where there is currently duplication of services or uses, following amalgamation there may be vacant rooms or parts of buildings which could be used by other Council services or let to outside bodies such as children's nurseries to derive revenue income. The amalgamation of school resources on to 'one' site will provide opportunities for economies of scale and better management of physical and personnel operations in the buildings. It may also be an opportunity to retain the best parts of the buildings and, through careful planning, release the not 'fit for purpose' parts

BACKGROUND PAPERS

[Cabinet report – March 2009](#)

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London Borough of Hillingdon

Successful, Sustainable, Viable Schools:

Infant & Junior Amalgamation Policy



London Borough of Hillingdon Amalgamation Policy

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Introduction

1. Hillingdon Council is a Local Authority (LA) with a role as commissioner and champion of parents and children. The LA has a statutory duty to ensure that there are sufficient and high-quality school places and wishes to support every school to be successful, sustainable, and viable. Hillingdon LA has delegated the majority of budgets and responsibilities to schools and the vast majority of Hillingdon schools provide a high-quality education to their pupils and strive constantly to raise the standard of education. They are committed to working collaboratively with each other and in partnership with all their stakeholders, with a strong focus on developing extended service provision for their local communities. Schools face constant challenges, and all are unique. LA works with them to shape a positive future for all pupils and schools.
2. Many pupils and schools have experienced high movement of pupils since Covid, and across London, primary school rolls have declined in the past few years and many now have some smaller year groups with fewer classes in. This affects how schools manage stability of classes, staffing and budgets and some have to move pupils between classes and teachers within a school year. The movements impact on pupils and constrains work to help them catch up after three years of interrupted schooling.
3. Schools need to be more resilient as rolls are volatile whilst families are still moving homes and jobs, and future roll projections are uncertain. London borough place-planning leads have discussed options to help stabilise schools and manage surplus places and declining primary rolls and a summary table of options is at Appendix 1. Hillingdon is now considering and progressing most of these options to best support schools in their different circumstances. The Education White and Green Papers, March 2022, adds further context and pressure, to improve support and integration of pupils with SEN in mainstream schools and for all schools to consider conversion to academy status, at the same time as budget pressures on schools will continue.
4. Approximately half of Hillingdon's total 99 schools are maintained by the LA; 1 community nursery school; 29 community primary and 2 special (1 primary and 1 secondary); 10 VA primary, 6 Foundation primary and 2 Foundation Secondary. These include most of the primary schools with the lowest rolls in Hillingdon, and current funding pressures require the LA to review how best to support these schools and prevent further schools becoming unviable educationally or financially. The other half of schools are academies, mostly in small local multi academy trusts (MATs) or standalone, 49 schools in a total of 22 Trusts.
5. Most Hillingdon primary schools are three form entry or larger, and 92% are graded good or outstanding by Ofsted and very popular with parents. There are only 8 one form entry schools, mainly Church of England or Roman Catholic schools. However, there are also ten pairs of Infant and Junior schools and following roll decline 18 (January 2022 Census) of these 20 schools have rolls below 420 pupils, a two form entry primary school, though they are two, three or four form entry. In September 2021 two more pairs of Infant and Junior schools became primary schools after consulting and deciding to amalgamate. The Infant and Junior schools are particularly vulnerable to financial and class organisation pressures as they only have three or four year groups to move teachers around. All are maintained except for two Junior schools that joined different MATs. In recent years several have had difficulties in recruiting leaders or staff, or have been graded 'Requires Improvement' by Ofsted and/or have fallen into deficit, as class sizes have fallen below the viable level (around 25). All of this affects pupil experiences and if one school is struggling, some families move pupils out of both schools.
6. Hillingdon LA has now updated its policy on amalgamation of Infant and Junior schools as it considers all-through primary phase schools are more resilient to support all their

pupils to learn and achieve across a wide curriculum, with continuity from age 3-11. This should have benefits across the borough:

- a. all schools more likely to maintain and improve the quality of education
 - b. parents in all areas of the borough continue to be offered a choice of local provision
 - c. public resources are used more efficiently and effectively.
7. This policy draws on the experience of those schools who have recently amalgamated and other LA's good practice, rooted in supporting educational improvement. Amalgamation will be considered when it is in the best interests of current and future pupils attending the schools involved, considering local and individual circumstances. In the implementation of this amalgamation policy, the local authority will work from 2022 onwards with governing bodies and other parties to achieve combined 'all-through' primary schools where and when appropriate. Also, the LA is willing to help broker discussions between one-form entry schools and dioceses about shared Executive Headships and other joint arrangements between groups of two or three small schools, who wish to retain their individual status but share costs and expertise.
8. Each Infant and Junior school governing body is asked to discuss this policy and plan their own route towards full amalgamation. For some this may be some years ahead, though others may be pushed by circumstances setting off triggers. Many already have joint committees of the two chairs and heads or have federated to form one governing body in advance of full amalgamation, with one Executive Head or share posts such as SENCO and site manager.
9. This Policy will only be applied to Hillingdon maintained schools for which the LA retains the responsibility for conducting school organisational changes of this nature. Any school that has converted to academy status falls under the remit of the Regional Schools Commissioner (RSC) on behalf of the Department for Education (DfE) and would not be subject to this policy. However, DfE national policy supports amalgamation.

The Educational Case for Amalgamation

10. The creation of all through primary schools brings a number of benefits including:
- a. The staffing structure is aligned with the National Curriculum Key Stages; there may be separate leaders for Foundation, Key Stages 1 and 2 but there will be coherent planning across the primary phase and shared expertise, giving greater flexibility across and between the Key Stages, to meet the needs of all pupils.
 - b. Separate Infant and Junior schools are disproportionately more likely to be graded Requires Improvement by Ofsted or to have budget deficits.
 - c. More resources spent on pupils in classes and employing specialist staff. A primary school provides strong continuity and progression for children and families in terms of the curriculum and social experience. This is particularly beneficial to pupils with special and additional needs or high abilities.
 - d. All pupils have access to staff expertise and resources such as musical instruments and groups, and sport, gym facilities and playing fields (most Infant schools do not have fields), and to a wider range of wrap-around and extra-curricular activities.
 - e. Better recruitment, succession planning and retention of staff and opportunities for staff to learn and develop professionally within schools. All teachers and classroom staff have access to the whole primary curriculum. This supports and informs whole school planning, assessment, pastoral systems, etc, and provides opportunities for wider staff development and experience across the full primary phase.
 - f. Infant and Junior schools are not eligible to apply for leadership schemes such as Teaching School Hubs due to their small size and infrastructure. The DfE rarely

recognises Infant schools within funded schemes, such as Covid digital devices. Primary schools receive more support than Infant and Junior schools, which strengthens the argument for the benefit of shared access to resources.

- g. This would create more three form primary schools and some four form entry - all with more scope to be flexible if some year groups are smaller. This will help schools make the best use of their funding and expertise.

Governance and Leadership

11. A single governing body and headteacher can provide strategic governance and vision for all primary key stages and be accountable for outcomes across the school phases, and allocation of resources between them. Currently there are difficulties recruiting governors so a refocus of resources would improve more schools.

Parents Views

12. Whilst Infant and Junior schools are popular with parents it was clear by 2021 that separate Infant and Junior schools tend to have more vacancies than all-through primary schools and where there is a local choice the nearby primary school tends to be full and over-subscribed and parents choose to move pupils into them if there are vacancies. This has led to pupils 'waiting' for a while until a vacancy occurs, and this is disruptive for those pupils and others in their classes.
13. Parents with several children can be irritated by the separate structures, offices and rules applying to their children across the two schools and the differences in policies such as reading, SEN support, behaviour, spelling, homework etc. However, where separate schools work closely together, the duplication of structures adds costs.

Financial Implications

14. Most of the separate Infant and Junior schools are below 420 pupils, that is two form entry and they lack financial resilience, scope for economies of scale or a wide range of staff expertise.
15. Local authorities are legally constrained in how much they can help schools in difficulty. School Budgets are currently under huge pressure from inflation, high fixed costs and a fall in primary rolls across London due to the impact of the lower birth rate, Brexit and Covid. Separate Infant and Junior schools are more likely than all-through primary schools to have financial pressures, and often the leadership structure and non-teaching costs are disproportionately expensive. The amalgamation of Infant and Junior schools should result in savings being achieved over the first few years, through a rationalisation of resources and economies of scale by combining operations and streamlining the procurement of services.
16. Combined schools sharing the same site are able to maximise the efficiency of their resources, with scope for more expertise to be shared across the school. A combined school staffing structure removes duplication and support functions can be consolidated across the single school, with a positive impact on the budget.
17. Primary pupil numbers are volatile and a combined single school on a site has more resilience to be flexible with allocating staff if year groups different in size, and improve the accommodation and use of the site.
18. The amalgamation of the schools will allow for a pooling of asset related revenue budgets, and the ability to manage property costs over both buildings, which will support a better maintenance regime.

The Policy

19. The London Borough of Hillingdon will require Governing Bodies of all separate Infant and Junior schools to consider amalgamating their two linked schools when one or more

of the following ‘trigger circumstances’ occur, unless there are compelling and overriding reasons:

- a) A headteacher vacancy arises in either or both schools.
- b) Total pupil numbers in either school are 25% or more below the Published Admission Number.
- c) Ofsted inspection in one of the schools identifies a ‘Requires Improvement’ judgement.
- d) One or both of the schools cannot set a balanced budget or has financial problems.
- e) One or both of the schools involved is judged to be a ‘School causing concern’ by the London Borough of Hillingdon.
- f) One or both schools have PANs or are recruiting at below two forms of entry – making the individual schools relatively small and at risk of becoming unviable within the Hillingdon funding context.
- g) Other pressures whereby the educational provision would be improved through amalgamation such as provision of SEN support, staff recruitment and retention or issues linked to the buildings.

Implementation

20. Discussions, advice, reports, and consultations about school organisation matters will be led by the Head of School Place Planning on behalf of the Director of Education.
21. Progress towards amalgamation will be presumed unless the educational advantages set out in this policy would not be delivered by combining the two schools. Both school Governing Bodies will need to work with the Local Authority to address any concerns and plan the timescale for amalgamation. The London Borough of Hillingdon will consider using the powers available to it to require amalgamation if there is a pressing case for this and Governing Bodies are not addressing the matters.
22. Newly amalgamated schools retain both lump sums in the year of amalgamation and then get some protection for at least one year (two if Schools Forum and DfE agree) and can choose to plan a longer phasing in of different changes; such as to policies, use of the building or staff structures; in order to maximise benefits and avoid negative disruption to pupils.
23. When considering whether to convert to academy status all governing bodies of separate Infant and Junior schools are urged to consider amalgamation at the same time. The Local Authority will not support separate Infant and Junior conversions as it fails to deliver all the education, social and other benefits to pupils, parents and schools set out above. There are now two lone Infant schools and if they wish to join the Trust of their linked Junior school, this would be supported by the LA.

Legislative Framework

24. Amalgamation involves making changes to the organisation of schools and this is governed by statutory processes that are detailed in the Department for Education guidance booklet [Opening and Closing Maintained Schools](#). Section 3 of the document specifies that the process for amalgamating a linked Infant and Junior school requires that one or both schools undergoes a ‘technical’ closure. This requires a formal consultation on proposals led by the LA, working closely with the governing bodies to involve parents, staff, and other stakeholders.
25. In accordance with the Education and Inspections Act 2006 (“the 2006 Act”) the local authority has power to bring forward proposals to make changes to schools. Within these powers there are two routes for the local authority to achieve a combined school:

- To extend the age range and expand the capacity of one school and to discontinue the other school.
 - To discontinue both schools and seek proposals for the establishment of an academy school.
26. When it is proposed to amalgamate schools under the terms of this amalgamation policy, the default position of the London Borough of Hillingdon will be to extend the age range and expand the capacity of one school and to discontinue the other school. This approach is adopted to ensure timely processes can be planned and to minimise any risk to the continuity of schooling.
27. When the trigger circumstance to amalgamate schools is the resignation of a headteacher, the local authority will usually discontinue the school where the headteacher has resigned and the vacancy occurs. The local authority considers that this provides a consistent and objective approach that does not imply any issue of underperformance or of take-over. The local authority will consider each case on an individual basis and consider any specific circumstances.
28. Whichever route is followed to establish the combined school, the governing body of the newly combined school must be representative of the former schools, with experience across Foundation Stage to Key Stage 2. If one school is closed and they do not already have a federated governing body in place, the governing body of the other school whose age range is extended will reconstitute itself for the combined school to ensure that this representation is achieved.

The Statutory Process

29. This section below, from the DfE guidance, sets out the stages of the statutory process. The statutory process below must be followed as set out by DfE in Opening and Closing Maintained Schools. The LA school Place Planning team will lead this for community schools and closely support Foundation schools.

Stage 1: Consultation

30. It is a statutory requirement to consult any parties the proposer thinks are appropriate before publishing proposals under section 10 or 11 for new schools and for section 15 proposals to close a maintained school.
31. The proposer may use the consultation to consider a range of options for the future of a school (e.g. amalgamation, federation, or closure). However, the proposer must then publish specific proposals (see stage two of the statutory process below). It is these specific proposals setting out details of the new school or the school to be closed which can be commented on or objected to during the statutory representation period.
32. It is for the proposer to determine the nature and length of the consultation. It is best practice for consultations to be carried out in term time to allow the maximum number of people to respond. Proposers should have regard to the Cabinet Office guidance on Consultation principles when deciding how to carry out the consultation period.

Stage 2: Publication

33. The proposer must publish the full proposal on a website along with a statement setting out:
- how copies of the proposal may be obtained;
 - that anybody can object to, or comment on, the proposal;
 - the date that the representation period ends; and
 - the address to which objections or comments should be submitted.

34. A brief notice containing the website address of the full proposal must be published in a local newspaper and may also be published in a conspicuous place on the school premises (where any exist), such as at all of the entrances to the school.

Stage 3: Representation

35. Proposers of a school closure should consult organisations, groups, and individuals they feel to be appropriate during the representation period (the information at Annex A can be used for examples).
36. The representation period starts on the date of publication of the statutory proposal and MUST last for four weeks. During this period, any person or organisation can submit comments on the proposal to the LA, to be considered by the decision-maker. It is also good practice for LAs to forward representations to the proposer (subject to any issues of data protection or confidentiality) to ensure that they are aware of local opinion.
37. The decision-maker will need to be satisfied that the proposer has had regard for the statutory process and must consider ALL the views submitted during the representation period, including all support for, objections to, and comments on the proposal.

Stage 4: Decision

38. The LA will be the decision-maker on a school closure proposal, unless the closure proposal is 'related' to another proposal that is to be decided by the Schools Adjudicator.
39. The Schools Adjudicator will decide proposals for new schools made by the LA (and cases where the LA is involved in the trust of a proposed foundation school). The LA will decide proposals for new schools from other proposers.

Actions and rough Timeline of key decisions – by both LA and schools

	Description
	Conclude informal discussions between Heads, governors and LA officers and other relevant stakeholders such as HR providers.
1	Full Governing Body decision to amalgamate.
2	Liaison with the Borough of Hillingdon over proposed amalgamation including agreeing Borough support/roles and responsibilities and process to seek Department for Education approval.
3	Informal consultation on proposed amalgamation with staff and unions (separate process for parents/carers and pupils). Acting Head Teachers, Governing Body representative, Borough Education Adviser and HR Consultant present.
4	If necessary, agree recruitment strategy for new Head Teacher & place advert.
5	London Borough of Hillingdon Cabinet Member approval to propose amalgamation LA will need to draft a Public Notice which will be sent to the West London Gazette (for publication on a Wednesday) and put up on the school site physically as part of the next step.
6	Formal 4-week consultation on proposed amalgamation with key stakeholders including staff, unions, parents/carers and pupils. Consultation meetings held with staff/unions and parents/carers. Acting Head Teachers, Governing Body representative, Borough Education Adviser and HR Consultant present as appropriate.
7	If needed, selection process for new Head Teacher including short-listing, invitations to selection day(s), interview and selection processes.
8	Ratification of Head Teacher appointment by Full Governing Body.
9	Final decision on proposal to amalgamate subject to the issue of Statutory Notice by Borough of Hillingdon. <i>Once all the views and feedback of all stakeholders has been considered then this must be sent to the lead member to agree for LA approval as per DfE guidance.</i> <i>If the decision is to proceed, the following steps apply. If the decision to remain as separate schools, then the process halts.</i> Where the LA is the decision-maker, within one week of making a determination they MUST publish their decision and the reasons for that decision being made on their website. They MUST arrange for notification of the decision and reasons for it to be sent to relevant parties.
10	Appointed Head Teacher* for the new primary school will review staffing structures for both schools in conjunction with Governing Body, Borough Education Adviser and HR consultant.
11	Head Teacher* in conjunction with Governing Body, Borough Education Adviser and HR consultant create the proposed staffing structure for the new primary school.

12	Head Teacher* in conjunction with Governing Body, Borough Education Adviser and HR consultant create or amend any new job descriptions for posts in the primary school.
13	Head Teacher* in conjunction with Governing Body, Borough Education Adviser and HR consultant produce a new primary school document covering staffing implications i.e. current and proposed staff structures and how the new structure will be implemented.
14	If there is a risk of redundancy, school** to declare a redundancy situation with advice and support of HR consultant meeting statutory and procedural requirements.
15	Head Teacher** in conjunction with the Governing Body and HR consultant to prepare invite letters to formal consultation meeting for staff and unions.
16	Head Teacher** to send the following documents to staff and unions, along with the invite letter to the formal consultation meeting: <ol style="list-style-type: none"> 1. new primary school consultation document explaining rationale for staffing changes 2. current staff structures for both schools 3. proposed new primary staff structure 4. implementation timeline 5. new job descriptions (where applicable)
17	Formal consultation meeting with staff and unions. Head Teacher*, Governing Body representative, Borough Education Adviser and HR Consultant present.
18	End of formal consultation period (consultation period up to 4 weeks).
19	The Governing Body considers responses raised during the consultation period.
20	Governing Body formally responds to staff and unions to end of consultation and in response to any comments receive
21	Follow staff restructuring process as set out in consultation documents/school policies.
22	Amalgamation and associated primary school staff structure takes effect.

ADDRESSING SURPLUS PRIMARY SCHOOL PLACES- OPTIONS TO CONSIDER

London Councils Place Planning Workshop – December 2021. Cate Duffy- Interim Director of Children’s Services, Islington

Option	Opportunities	Risks
1. Financial advice to schools to reduce costs- e.g. staffing restructures	<ul style="list-style-type: none"> <input type="checkbox"/> May support school sustainability if action is taken in a timely fashion. <input type="checkbox"/> Likely to be something all schools need to consider in a context of surplus places 	<ul style="list-style-type: none"> <input type="checkbox"/> LA may not have the expertise to provide advice- schools may not wish to accept <input type="checkbox"/> Unlikely this will be enough by itself to sustain some schools if there is a large surplus in the area or where school already has significant falling rolls <input type="checkbox"/> Staff reductions may impact more negatively on vulnerable children <input type="checkbox"/> Any redundancies bring extra costs
2. Partnerships – Federation or MAT	<ul style="list-style-type: none"> <input type="checkbox"/> May support wider school improvement objectives of school collaboration and system leadership <input type="checkbox"/> may reduce costs through shared appts <input type="checkbox"/> May improve popularity of a school if partner with more well regarded school 	<ul style="list-style-type: none"> <input type="checkbox"/> Tends to increase not reduce costs – e.g. larger SLT <input type="checkbox"/> Unlikely to be enough to sustain schools if there is a large surplus in the area or where an individual school already has significant falling rolls
3. Additional provision to increase revenue – Early Years or SEND Resourced Provision (ARP)	<ul style="list-style-type: none"> <input type="checkbox"/> May provide additional revenue <input type="checkbox"/> May improve popularity 	<ul style="list-style-type: none"> <input type="checkbox"/> Early years numbers likely to be low if birth rate falling <input type="checkbox"/> Costs of SEND provision may be higher than income <input type="checkbox"/> Schools with falling rolls may not have the right culture and expertise to support SEND provision and may not be popular with parents of children with SEND- therefore decisions on ARP must be driven by the needs of SEND children
4. Co-location with other services e.g. libraries	<ul style="list-style-type: none"> <input type="checkbox"/> May provide additional revenue and support running costs <input type="checkbox"/> May provide additional curriculum opportunities for children e.g. library <input type="checkbox"/> May enhance position of school as heart of community 	<ul style="list-style-type: none"> <input type="checkbox"/> Unlikely this will be enough by itself to sustain some schools if there is a large surplus in the area or where school already has significant falling rolls <input type="checkbox"/> May be practical challenges in separating space and ensuring safeguarding
5. Co-location with another school	<ul style="list-style-type: none"> <input type="checkbox"/> May reduce running costs for both schools- efficient use of one site/facilities <input type="checkbox"/> May allow school in poor quality buildings to move to better quality <input type="checkbox"/> May free up a school site in location which supports wider council objectives/services <input type="checkbox"/> Minimal redundancies <input type="checkbox"/> may encourage collaborative working 	<ul style="list-style-type: none"> <input type="checkbox"/> Disruptive for all staff and students but particularly the school that is moving <input type="checkbox"/> May be unpopular with parents at one or both schools <input type="checkbox"/> Requires culture shift by both schools to share space which may be challenging <input type="checkbox"/> Risk that empty site may be taken for Free school (likely to be much reduced if area has surplus places and good outcomes)

6. PAN Reduction	<input type="checkbox"/> Largely uncontroversial <input type="checkbox"/> Achieves reduction of places to reduce impact of falling rolls <input type="checkbox"/> Capacity can quickly be brought back if demand increases	<input type="checkbox"/> Requires 2 year lead in for perm reduction <input type="checkbox"/> Creates more smaller schools- reduces parent choice and may be more financially insecure <input type="checkbox"/> Stops the tap but takes 7 years for full effect
7. Merger with PAN reduction- 1 school closes by default	<input type="checkbox"/> Achieves immediate PAN reduction across all year groups <input type="checkbox"/> Timescale about 1 year but can be implemented up to 3 years later allowing more children to work through original school <input type="checkbox"/> All children from one school move together – less disruptive for them and more acceptable to parents <input type="checkbox"/> Children likely move from an unviable school which may not be able to provide best quality education to newly merged school which is likely to be financially sustainable	<input type="checkbox"/> Likely to be unpopular with the community of at least one school and therefor politically challenging <input type="checkbox"/> Risk that empty site may be taken for Free school (likely to be much reduced if area has surplus places and good outcomes) <input type="checkbox"/> Redundancies likely
8. School closure	<input type="checkbox"/> Achieves immediate PAN reduction across all year groups <input type="checkbox"/> Timescale about 1 year but can be implemented up to 3 years later allowing more children to work through original school <input type="checkbox"/> Most children moving from closed school likely to move to other LA schools with spaces and therefore improve their viability	<input type="checkbox"/> Very disruptive for children attending closed school – lose likely to separate from friends, progress likely to be negatively impacted particularly for the most vulnerable <input type="checkbox"/> Influx to neighbouring schools may be hard to manage and have negative impact on quality of education <input type="checkbox"/> Likely to be unpopular with the community of at least one school and therefor politically challenging <input type="checkbox"/> Risk that empty site may be taken for Free school (likely to be much reduced if area has surplus places and good outcomes) <input type="checkbox"/> Redundancies likely

NOTES

- These options are not mutually exclusive. Areas with a large surplus may need to consider all of them.
- All options will require discussion with the RSC and Diocesan Board in the case of academies and faith schools. In the case of academies the RSC is the decision maker and therefore the LA must lead by influence
- Objections to PAN Reductions/School Closure can be raised with the Schools Adjudicator who has the power to overrule
- Under Section 77 of the School Standards and Framework Act 1998, local authorities are required to apply for the consent of the Secretary of State for Education to dispose of, or change the use of, land used for maintained schools and academies. The Secretary of State must first consider the potential for the land to be used by an existing or potential Academy (Free School).

Appendix 2 - Consultation Responses

Introduction

Response: Don't know; "The document doesn't provide any balanced argument about why amalgamation may be a negative action."

Response: No; "In point 5 do not agree that there are class organisation pressures in a junior school because there are only 4 year groups. Class organisation has never been an issue for us. Teachers apply for post knowing the year groups they will teach. Please can you site the evidence to say that several schools have had difficulties recruiting staff, or been graded RA?"

Response: No;1. "The opening sentence is interesting in that I would agree that is the role of an LA but would be cautious in declaring or implying that is done really well across the phases and range of provision. I would also have a similar caveat on the past declaration in Par 1. Para2 agree. Para3 'support' [used twice] from whose point of view as neither the White paper or Green Paper referenced are statute? Falling Primary Roles are an issue so Appendix 1 is worth consideration apart from point 3 in relation to establishing an ARP[LBHspeak it would be SRP! Providing additional revenue should be the last consideration for taking on a huge endeavour such as an SRP and many schools who have done so have found them to be uneconomic in terms of cash flow and as a catch all net often used by the LA to park some very complex needs as key specialist provision has been historically and strategically underdeveloped [primary expansion did not encompass primary specialist provision;"]

Response: No; "We have not had problems attracting well qualified staff in a two form entry school and the the school has been classified as good consistently doing better than many acadmys. We recognise changing demographics in Hillingdon. Our schools have been praised by the school improvement partners as examples of good practice of working together. Every time there are significant changes this has been reviewed. We have provided expertise in music and PE. I agree we can't apply for leadership schemes but have actively encouraged leadership roles in the Hillingdon primary leadership hub"

Response: No; "The third sentence in para 5 is misleading. Only a four form of entry junior school could ever have had a total number on roll in excess of 420. There is no recent problem caused by falling rolls. The sentence at 6b is incorrect. Amalgamations would reduce parental choice because there would be reduction in the number of separate infant and junior schools on offer."

Response: No; "I do not feel we are financially more vulnerable and as a teacher I have chosen to work only within the year groups I am comfortable teaching. I specifically chose to work in an Infants school so that I could never be put in a Junior class, a position that would make me leave the school. I also feel that we are more specialised to our year groups here so believe the children have a better focus on their needs by people who are experienced at teaching within this age group for their age."

Response: Don't know; "I don't have experience of schools across the borough so not sure whether 'Do you agree...' is an appropriate question for me"

Response: No; "school roll not declined"

Response: "Change of head teacher"

Response: No; "We have not found it hard to recruit, 36 teachers applied for a teaching position in our school. We recruited 4 new teachers. Next year we are over 92% full, this year we are 97% full. We successfully catch children up so they are ready for their next step in y3. The children always do well in KS2 SATS. We have not found it hard to recruit Governos and have our own separate one at both schools."

Response: No; "I don't agree with the following -The infant and junior schools are particularly vulnerable to financial and class organisation pressures as they only have three or four year groups to move teachers around. I feel staff become more specialised in dealing with children within those specific year groups."

Response: No; “We do not have smaller classes. Our numbers are sustainable. I also disagree that parents prefer 3 form entry. As a parent myself why would I choose to place my child as 1 of 90 when they could be 1 of 50 or smaller.”

Response: If No or Don't know, please can you provide your comments below; The introduction sets out the case for primary schools and academies with the main thrust being economic sustainability. Although it is vital to have thriving schools for the community there is still an impelling case for keeping schools smaller with expertise in the phases. Having worked in a large primary school, there is more of a likelihood of CPD being favoured for a particular age range rather than across the board. I sat through countless teachers meeting where the older phases in education were the bulk of the discussions. The early years was totally ignored. With larger schools there are many competing needs. Training days tend to focus on the majority and not so much on particular staff needs etc.

Response: No; “• Data errors throughout •Lack of evidence for statements made throughout no referencing for data •Lack of clarity throughout”

Response: No; “Where is the evidence for this that proves amalgamation improves resilience? 92% of outstanding or good schools is fantastic and something to be proud of. Why would we need to change something if it is working well? Recruitment - this has not been our experience. We have found that we have had more applicants than other schools for recruiting as people prefer the more specialist provision of Infant / Junior. Point 6 - is there any documented evidence or research for this?”

Response: No;- “the evidence for the statements isn't provided- Hillingdon already has 92% of schools Good/outstanding -recruitment isn't a huge issue as an infant school we have applicants who are interested in the Foundation stage /Key stage One”

Response: No; “We are a very successful school – from previous Ofsted reports and we do plenty of work in collaboration often with the Junior school as well as a variety of local cluster groups, the Heads Forum as well as the Safeguarding Cluster group. 92% good or outstanding schools so we see no need to change something that is working. We have no problems with recruitment and can recruit staff who are have this year group as their specialty and are therefore better practitioners ie Early Years How can we be sure that amalgamation not lower the overall performance of the school? In point 6, where is the evidence for benefits a, b and c? Are there surveys or statistics support these claims and how exactly will amalgamation increase resilience? Schools that have amalgamated do not always find it fulfils all these benefits and have spoken of negative areas too. This is a governing board decision, not the LA.”

Response: No; “Point 6- what evidence is this based on?”

Response: No; “Where is the evidence for this? Would amalgamation improve resilience? (3) - 92% of outstanding or good schools is fantastic and something to be proud of. Why would we need to fix something if it isn't broken? (5) - Recruitment – on the contrary. Most infant and junior schools experience a higher number of applicants due to the more specialist nature of the school (5) - Would amalgamation not lower the overall % of good / outstanding schools? - Point 6 – is there any documented evidence or research for this? Is this just an opinion? - Recently amalgamated schools that we are aware of have had a negative experience - As indicated, this is a governing board decision and not of the LA (8)”

Response: “How can we be sure an amalgamation would improve the anything. We are currently Ofsted outstanding and amalgamation could affect this rating.;No ”

Response: No; “Where is the evidence to show that amalgamated schools have a better achievement rate the schools that have done this haven't showed this to be true.”

Response: No; “Having previously worked in a Primary setting, I have found the infants school's environment more focused on the younger children development, which is not always the focus in a primary school.”

Response: “In principle however there is no mention of larger establishments and what the cap on numbers may be if any. Needs to refer to the fact that not all buildings in the current state would lend themselves to making it easy to amalgamate. ;No”

Response: No; “I do not agree with schools amalgamating - I am aware of schools that have recently amalgamated and staff do not feel this has been beneficial for the children.”

Response: No; “how does only having 4 year groups make them financially vulnerable? A3 form entry infant or Junior school has 12 classes more or less the same as a 2 form entry primary school. The facts shared are not those experienced by Infant Schools. Staying as separate schools means that if one school goes into a category over 300 children are not affected if the schools are separate. Primary schools originally saw a reduction in numbers and had to reduce their PAN. This is only the case now in schools that the LA made expand and where huge amounts of money was spent on new schools. This is now starting to spread into the secondary sector where vast amounts of money was spent on rebuilds. The situation in my school does not offer a proposition of amalgamating as the LA were happy for the attached Junior school to go to an Academy. This has resulted in large numbers of children leaving the school. As well as staffing issues around leadership and performance. Negative feedback recently amalgamate”

The Educational Case for Amalgamation

Response: No; “Amalgamation may lead to the creation of very large primary schools. This could lead to less of a focus on individual children reducing the quality of pastoral care and result in less of a focus on different parts/ key stages of the school leading to a decline in standards and outcomes. Most junior and infant schools are at least Ofsted 'good' in Hillingdon. Infant and junior schools can achieve a well sequenced curriculum between the schools through close collaboration. Collaboration and not amalgamation can achieve many of these policy's stated aims without limiting focus on parts of a school.”

Response: No; “We are able to focus on the Key Stage that we are responsible for. Our children achieve well and are prepared for their next stage of education as they have experienced a transition already.”

Response: Don't know; “Again there is no clear indication if there would for example be job losses which I believe could negatively impact children. Additionally there is no recognition that running an infant school separately for the juniors brings with it a high degree of specialism in this key stage which is of great benefit to the pupils.”

Response: “Point b - Can you site the evidence to say that separate infant and junior schools are more likely to be judged RI? Point d – I do not agree - all pupils will have access to such resources in infant and junior schools”

Response: No; Yes; “Overall a yes as there are economies of scale to be had and 9.2 out of 10 schools are rated Good or Outstanding by Ofsted is a testimony to both the commitment and resilience of schools which rather rebuts the notion that schools are not currently resilient enough p3 para 3”

Response: No; “The schools already have long established structures for sharing school field, resources and involvement in the primary forum.”

Response No; “The suggested benefits described in points 10a to 10e are only possibilities. No evidence has been produced to suggest that they would definitely happen.”

Response No; “I believe schools will be judged by OFSTED according to their performance, not more harshly just because they are an Infants/Junior school. If this was actually happening surely we would have a case to have OFSTED investigated.”

Response “I agree with some of it - for example, retention of staff might be hindered as a smaller school cannot offer the same level of opportunity as large. However if your aim is to e.g. only have 1 SENCO

across a whole primary, rather than 2 with specialist skills in EY/KS1 and KS2, then amalgamation isn't necessarily going to improve that. On other points in this paragraph I feel that specialism in up to 7s / 7+ education is a benefit of separate schools and you have only included an educational case *for* rather than a balanced evaluation of the pros and cons. I expect that the LA would still present a case that, on balance, concluded *for* amalgamation but the current document is limited by failing to consider any alternative point of view."

Response: No; "not requires improvement good plans and resources"

Response: "Change of head teacher"

Response: No; "Both the schools are and have been Good or outstanding for an extremely long time. Primary schools still struggle with the budget given to them to support all children, I worked in one for 8 years before joining the borough and had the same budget worries. The number still fell. We use the Junior's field for sports day and events as we work well together. You still have the same worries with recruitment in a primary school, some teachers will not teach in other key stages therefore prefer a Infant school as they know they will only be asked to teach in EYF/ KS1. We are already a 3 form entry school."

Response: No; "Don't agree with a lot of the points made especially the following - Separate infant and junior schools are disproportionately more likely to be graded Requires Improvement by Ofsted or to have budget deficit. Are the Schools Finance team actively working with these 'deficit schools' to bring their budget back in line?"

Response: No; "When a school amalgamates the staffing becomes too big. The curriculum becomes difficult to manage especially if there is to be only one co-ordinator per subject.. Resources become stretched because you eventually lose the amalgamation money .As a junior school we received covid devices. How does making a school larger benefit? A spreviously stated. 60 in a year group which amalgamation could extend to 4 form entry . That's 120 children in a year group. Children will become lost in a system. The whole school nurturing becomes vulnerable. School plays, sports teams all become too big and some children will not get the opportunity to take part in these."

Response: No; "We have had a recent good Ofsted grading, no issues with recruitment and our children's attainment is above national."

Response: No; "We have had a rent good foster grading, no issues with recruitment and our children's attainment is above the national average."

Response: No; "I understand the financial burdens placed on schools and falling or volatile numbers but I still believe parents prefer smaller schools where they are more likely to be included as part of a small community. There are many families who feel isolated or are new to our country. For these families, it will be harder to establish a sense of belonging. When parents don't feel welcome or feel lost as they may not have the confidence to vocalise their opnions; a larger school is less likely to meet their needs. Parents engagement in their children's education is vital to their children's success."

Response: No; "•Lack of evidence throughout • Lack of positives of amalgamation shown •Doesn't reflect reality of the partnership working already taking place in Hillingdon between schools."

Response: No; "Points 10b and 12 contradict each other. We do not feel that we have a lack of resources? How has this been measured?"

Response: No; "We do plan across the Key stages to ensure our children have continuity going through both schools. We have a very coherent transition procedure so our children are at ease with the process into the Junior school. Children are more likely to learn resilience if they can make new steps in the safety of school setting which is exactly what we do when we start the transition process into Juniors. Both schools use the same platforms for communication and recording ensuring communication is strong and effective between the two schools and with the parents of both schools. Points 10b and 12 appear to completely contradict each other – and our budget is healthy. We also have a wide range of musical, physical and wrap around facilities. Is the evidence for these 'benefits' documented to support this or are these opinions? Currently our staff take part in maths, music and English hubs."

Response: No; “Point 10b- what evidence is this based upon? It is also contradicted by later Point 12. Point 10d- separate infant and junior schools have two sets of facilities- two halls, etc- so are actually able to offer more extra curricular activities separately than combined;”

Response: No; “Points 10b and 12 completely contradict each other - Point 10 – where is the evidence documented to support this? Is this just an opinion? Not how we feel working within the school? - ‘Lack of resources’ – according to who?”

Response: No; “This section contains contradictions with no evidence to support these comments”

Response: No; “AS an infant school we are very well resourced and the results of the school speaks for itself. Also points contradict themselves for example point 10b and 12”

Response: No; “With reference to 10d and having previously worked in a primary school, it would appear to me, personally, that there is a higher quality of staff expertise in specific areas relating to young children’s’ needs with ample resources readily available to support.”

Response: “Recruitment may still be affected by choices teachers make. Some staff really like to work predominantly in Key Stage 2 or Key Stage 1. Point c suggests that separate schools perhaps don’t have aspiration however there are examples of excellent social experience and superb challenge for the future. Point e needs clarification as all teachers do understand the whole primary curriculum as this is an integral part of high quality teaching and learning to plan, deliver and evaluate the appropriateness of the curriculum for all children.”

Response: No; “There does not seem to be any evidence documented to support these points.”

Response: No; “There are no Infant Schools in Hillingdon in an RI category. The understanding of child development and the focus of resources in an infant school mean that SEN children are identified much earlier and specific provision is put in place for them earlier meaning that they get the support that they need before they are 7 which is vital, especially in the case of Speech acquisition.. Staff like to be able to specialise recruitment very easy staff retention much better than in a primary school. points 10b and 12 contradict.. most primary schools do not provide after school clubs for infant children, infant schools do. Infant aged pupils in primary schools did not get Covid digital devices. We are able to access apprenticeships and Leadership funding ie NPQL etc”

Governance and Leadership

Response: No; “Sort of hard federatioJ3:J41e stated aims as well”

Response: “Our governors and headteachers provide strategic governance and vision across their key stage.”

Response: “Don’t know; Does this mean there will only be one Head teacher? Thus losing talent, experience and excellent understanding of different key stages?”

Response: No; “Point 11 - GBs of infant and junior schools can provide strategic governance and vision, even though not across key stages”

Response: No; “Strategic leadership comes from communication and there are already structures within separate schools.”

Response: No; “Amalgamation might provide the suggested benefits but there is no guarantee that this would happen.”

Response: No; “You will increasingly be short of Governors even without amalgamation. I don’t feel this is a justifiable reason to amalgamate.”

Response: “Again, some. I can see that difficulty in recruiting governors might be helped by amalgamating 2 GBs, but we have a number of governors serving on both infant and junior GBs at our school as we recognise the efficiencies that it brings. “

Response: No; “strong governing body and leadership”

Response: Yes “Changing of head teacher”

Response: No; “We have just recently recruited Governors without problems.”

Response: Don't know; “Headteachers and governors could work more closely together”

Response: No; “Our governors have a good understanding across both schools and work closely with the infants and juniors.”

Response: No; “I think resources are better spent where there is only one phase in education. There are less competing forces. I agree it is extremely difficult to recruit governors but surely this is due to the legal expectations required of the governing body. Being held accountable for a school is an enormous responsibility and when things don't go according to plan there is a huge workload for governors, especially considering that most governing bodies work voluntarily”

Response: Don't know; “Lack of evidence that there is any difficulty in recruiting Governors specifically for Infant/Junior schools – there is a general difficulty recruiting volunteers overall.”

Response: No; “As Governors, we feel that our strategic vision and focus is clearer as we focus on children specifically at the earliest point of their development”

Response: No; “We feel our school is stronger for being an infant School as already we have two key stages represented. This leads to more focused resource allocation and expertise. The children get a strong foundation to the rest of their schooling”

Response: No; “We know what works best for the age group of children in our school, we are very focussed on the offering the best opportunities for this age group. We feel there would be a very different approach if we were to amalgamate and we would lose the focus on Early Years and KS1.”

Response: No; “It isn't clear what would happen in schools such as ours where the junior school are already part of a MAT”

Response: No; “A single governing body and headteacher can provide strategic governance and vision for all primary key stages and be accountable for outcomes across the school phases, and allocation of resources between them. Currently there are difficulties recruiting governors so a refocus of resources would improve more schools.”

Response: No; “The staff as a whole are specifically trained and geared up for children up to and including KS1 therefore our vision is not only clear but proven to be successful.”

Response: No; “In our school we know the pupils very well and that is because we are just infants. WE can meet the needs as and where needed and have a clear focus. If we became an academy it is likely to operate differently and have a different vision.”

Response: No; “Staff and Leadership are deeply knowledgeable in all areas of the infant's school. Personally, staff are in a much better position to remain more focussed on the specific areas of the infant environment as opposed to a primary school setting, thus providing a greater nurturing setting for the younger children.”

Response: Yes; “Sharing a Governing Body would also occur at the first of a Federation and this would be useful.”

Response: No; “There is a clearer vision and an extremely child centred approach.”

Response: No; “Governors feel that they know the school better, in an infant school the 2 very different keystages mean that there needs to be more specialism, the transition to Juniors is easy as it is just an extension of KS1 not a completely different structured curriculum.”

Parents Views

Response: “No; I have had two different children in different schools and we managed fine. The schools liaised well together so minimised any issues for parents.”

Response: No; “I was a parent of these schools before teaching here and the procedures for each school were very clear and not confusing.”

Response: Don't know; “Point 12 – can you share the evidence to show that there are more vacancies infant and junior schools than primaries?”

Response: Yes; Mainly

Response: No; “Already close communication exists to allow continuity and progression.”

Response: No; “No evidence has been produced to support these assertions. There has been no survey of parents' views.”

Response: No; “We have considerably less vacancies than other Hillingdon Primary schools I have worked in recently and keep in touch with. That argument does not apply to Newnham.”

Response: No; “Having been a parent with children in the infant and junior school at the same time I didn't ever have any frustrations with different rules (and that includes SEN involvement from 2 different inclusion teams). So I see this could be a risk, but that's not necessarily a feature of separate schools. Our nearest full primary has historically been oversubscribed but talking to parents across Northwood since starting to look at schools with my oldest child (in 2004) it has always been apparent that some of that is driven by perceptions of Northwood vs Northwood Hills and a fair amount of snobbery. Once in the 2 schools, feedback from parents has generally been similar and frustrations about different rules/approaches from different staff/year groups is apparent in the full primary. I think some of this is just too simplistic - as above, failing to take into account alternative points of view. I get it, the LA wants to promote amalgamation, but the consultation document is not balanced.”

Response: No; “parents welcome caring, nurturing infant school”

Response: Yes; “Changing of head teacher”

Response: No; “BWI has so many places spare and is an all through Primary, Warrender hasn't filled all their spaces. The transition between our schools is smooth, we work really well with parents and only one form has to be filled in.”

Response: Don't know; “Yes and no, depends on how well the two schools work together.”

Response: “To a certain extent I agree. Infants and Juniors operate differently, and should. The juniors are preparing our children for the next stage, secondary school. They also prepare the parents. They will not be able to come to a class door and start voicing their concerns”

Response: No; “Parents should have the choice of a smaller school for their child. We are forcing parents into placing their children into large settings. This one size fits all policy is not acceptable. I would also like to see the statistics for these 'vacancies' and the numbers for . You cannot use words such as 'tend'. There should be actual statistics.”

Response: No; “This has not been a case at our school. This is reflected in recent parent surveys”

Response: No; “Yes; This is not the case with us. We have very strong parent partnerships. This is reflected in recent parent surveys.”

Response: Yes; “No;Some parents may be irritated by the different structures in different phased schools. Others may prefer a smaller school community where their child and they are more likely to be recognised.”

Response: No; “Which parents were surveyed for this? Ours were not asked. Many Infant and Junior Schools were encouraged to expand, hence having spaces. Most have reduced or have applied to reduce PAN now which shows that the school is taking financial control.”

Response: No; “Where were the parents polled from for this research? We have been forced to expand resulting in school paces since this expansion.The governors have requested to reduce the PAN which would result in us taking financial control of our school's future rather than the current uncertainty.”

Response: No; “Which parents were surveyed, because our parents were not? We don't believe this is an issue as we work closely with the Juniors to ensure continuity of care which is so important particularly to vulnerable children and these with SEN. Our awareness of children with these needs ensures the best outcomes for successful transition to the new school. Many infant and junior schools have had encouragement to increase their numbers and going forward find now have spaces. We have reduced our PAN showing that we as a school are taking control of our finances and this can be expanded if and when necessary.”

Response: No; “Point 13- what evidence is this based upon?”

Response: No; “Whilst most Infant and Junior schools are graded Good or Outstanding by Ofsted and popular with parents it was clear by 2021 that separate infant and junior schools tend to have more vacancies than all-through primary schools and where there is a local choice the nearby primary school tends to be full and over-subscribed and parents choose to move pupils into them if there are vacancies. This has led to pupils ‘waiting’ for a while until a vacancy occurs, and this is disruptive for those pupils and others in their classes. 13. Parents with several children can be irritated by the separate structures, offices and rules applying to their children across the two schools and the differences in policies such as reading, SEN support, behaviour, spelling, homework etc. However, where separate schools work closely together, the duplication of structures adds costs.”

Response: Don't know; “Our parents have not been surveyed so until such times as they are we cannot comment on their views.”

Response: Don't know; “Which parents were surveyed? Was our parents?It looks like schools are taking financial control with reduced PAN”

Response: No; “In our Infants’ school, the majority of the parents are extremely happy to have the extra care and attention an Infant school can provide to their younger children.”

Response: “I think predominantly parents would choose a school at Key Stage 1 and 2 where they felt that all staff knew them and their children. ;Don't know;”

Response: No; “I would be interested to see how many parents and which parents were asked. We only have positive feedback, parents specifically choosing our school because we are a separate infant and junior school. We have parents move their children to our school from a primary school and comment on the positive difference they can see from us being an infant school. They feel there is more care, better relationships with staff are built and it is a very child centred approach.”

Response: No; “our parents were not consulted- the reason that parents left was because the Junior school became an academy led by a secondary school who has a poor understanding of primary provision where 1 corporate lesson plan doesn't fit all. Having to liaise with an academy has caused us huge problems around lunchtime provision, shared grounds and staff and being able to have flexibility to respond to trends etc quickly. Any large school would employ staff who are focussed on the different key stages so there is no duplication of staff in infant and Junior schools only more specialisation.Lots of parents do not like ethos of Primary schools. lots of parents want their child in a smaller setting where they are known and don't get lost among 800 other pupils.”

Financial Implications

Response: No; “Schools can achieve economies of scale and other financial savings if they collaborate closely - amalgamating is not necessarily needed to achieve this.”

Response: Don't know; “Will redundancies be made?”

Response: Don't know; “Point 18 – mentions combined schools sharing the same site – how will this maximise resources for split sites?”

Response: Yes; “para 14 agree; 15 it is true but not that simple and it would have been good to have had these conversations about shelter much earlier before the storm arrived! And add Ukraine to that list of affecting variables as well as the unfunded support in some schools for refugees with high dependency ! Also the devolved capital amounts are so small as to make the aspiration in point 18 largely redundant.”

Response: No; “Schools already work to maximise efficiency with shared site manager. The governing bodies look for ways to rationalise resources.”

Response: No; “This section makes no mention of the medium term loss of £140,000 annually as a result of losing one lump sum. This section is more an argument for closing one form entry primary schools than for amalgamating infant and junior schools.”

Response: Don't know; “I don't have any budgeting experience but do know that when I have worked in Primary Schools the money is largely focussed on KS2. EYFS and KS1 rarely feel the financial benefits in a combined school.”

Response: Yes; “This is the most convincing section as it is obviously a fact of life that larger organisations are better placed to benefit from economies of scale. However, that does not necessarily translate into quality, and in education it is more important to consider value for money than just cost. Inclusion in an infant school with a significant number of children with EAL and no prior schooling even when arriving in year 1/2 is very different from inclusion with an 8 year old who has been in the system for several years, and specialism may require additional costs in order to provide the best support.”

Response: No; “financial resilience and have staff expertise”

Response: “Changing of head teacher”

Response: No; “We have set a profit budget and have funds to take through for the following years. Our schools are so large with up to 322 on each, we would still need 2 site managers, office staff etc due to the schools being vast.”

Response: No; “If you have 2 separate building how do you propose to 'save' cost? How are the staff we would no longer need to have 2 of meant to split their time over the 2 schools? A good school business manager/bursar should be able to advise the changes needed in order to run a balance budget, especially if they are buying into the school Finance SLA!”

Response: No; “We have maintained our finances and have actually been chosen to support other schools in sorting their finance out. Again where is your evidence?”

Response: “Financially, the proposal will make savings. Rather than forcing amalgamation, surely, reducing pans and finding a way of being more responsive to the fluctuations of birth rates in a more timely manner would be a better cost saving system. Temporary reductions in pans and increasing pan sizes in response to the local demographics and estimated numbers attending should be considered. There are schools that have recently been developed that have affected numbers in existing schools. For example, St Martins on the Laurel Lane site, Lake Farm so close to many schools in the Botwell community and Ruislip High in the north of the borough. Although a new school is very attractive, sometimes the consequences can be a fall in numbers in older existing schools. This again, creates sustainability issues for the older schools.”

Response: "No; • Who has been polled to canvas these views? Where is the evidence? • Not relevant to most Hillingdon schools as sites are shared. • Lack of clarity on what policy is referencing re: structure – is this people or buildings? • Does not reflect practical experiences at NINS. • Contradictory throughout e.g. pt 10b & pt 12;"

Response: No; "Our school budget is healthy and in surplus. From September 2023 we have reduced our PAN and the school is forecast to be at capacity"

Response: No; "we maintain a healthy school budget despite the impact of uncertain rollse umber of vacancies"

Response: No; "We have a number of expert staff in many areas and our budget is healthy and in surplus. We are reducing PAN, so we are expecting to be at capacity showing how we can operate in changing circumstances and are flexible in our approach. Our site team operates over both sites so this is already in place for us."

Response: No; "RE: avoiding duplication of staff- will this not mean there are financial implications around redundancy?"

Response: No; "Most of the separate infant and junior schools are below 420 pupils, that is two form entry and they lack financial resilience, scope for economies of scale or a wide range of staff expertise. 15. Local authorities are legally constrained in how much they can help schools in difficulty. School Budgets are currently under huge pressure from inflation, high fixed costs and a fall in primary rolls across London due to the impact of the lower birth rate, Brexit and Covid. Separate infant and junior schools are more likely than all-through primary schools to have financial pressures, and often the leadership structure and non-teaching costs are disproportionately expensive. The amalgamation of Infant and Junior schools should result in savings being achieved over the first few years, through a rationalisation of resources and economies of scale by combining operations and streamlining the procurement of services. 16. Combined schools sharing the same site are able to maximise the efficiency"

Response: "School budget is ok and we expect to be running at full capacity.;Don't know"

Response: Don't know; "Understanding is that school budget is very good so guess that PAN is being reduced which can only be positive ."

Response: No; "With reference to my reply on The Educational Case for Amalgamation...I would reiterate that in comparison to the Primary School I previously worked in, resources and expertise to help develop both the children and staff is far more superior in the Infant setting. There are also sufficient funds to support staff professional development throughout each year group."

Response: Don't know; "Not sure what evidence has been used. Most schools discuss procurement and services already so that the most cost effective services can be purchased."

Response: No; "We have a healthy budget and have been able to buy in our own specialist staff, playtherapists, SALT and EP this has been the only stability we have had in these services as the LA provision has been very sketchy and the quality of the staff has been dreadful. Our bought in services saw children face to face throughout Covid we are still struggling to get that from LA staff. outside audits have recommended that the school look for Flagship status for SEN. We are now going back to being 3 form entry and will again have a waiting list- as this means that we are full financially we are even more secure, to ammalgamate with the Junior school where numbers are low would put the school in a poor financial state."

The Policy

Response: No; "The RI judgement should be reviewed as a trigger circumstance. The Policy specifies that if one of the schools is identified as RI by Ofsted it will meet one of the trigger circumstances. However, the DfE do not issue such schools with an academy order and the school is subject to more frequent inspection by Ofsted - in this case, the school should be given opportunity to improve standards and the outcome of the subsequent Ofsted inspection reviewed before going ahead with amalgamation"

especially if there is a new leadership team in place. The receipt of two consecutive RI Ofsted judgements should therefore be the trigger circumstance.”

Response: No; “Point 19 d) – most schools cannot set a balanced budget for 3 years so infant and junior schools are not any different to them Point 19 g) – ‘other pressures whereby educational provision would be improved through amalgamation such as’ Is too ambiguous and general, sounds like any factor could be used to amalgamate.”

Response: No; “one RI Ofsted outcome for one school then no but two consecutive RIs then yes. 19 g is just a catch all bit of fine print that should be ejected from the document”

Response: Don't know; “If such trigger problems were to arise then amalgamation is one of the options which would have to be considered but it would not be the only way to solve the problem.”

Response: No; “If one school is suddenly deemed 'requires improvement' why should the other school be made to take them on and suffer the consequences of amalgamating. Any 'requires improvement' school should be supported for its individual situation by outside help or a range of SLT from other schools. They do not need to amalgamate to get them out of a mess. That just creates more stress and change on everyone.”

Response: Yes; I think it is very reasonable in that you have only required GBs to consider amalgamation - which I understand to have happened on more than one occasion in the past at my school before I was a governor and I'm sure will happen again at some point. I think that feeds into my frustrations as set out in comments above in that your policy reads as very reasonable, and therefore why not set out a more balanced assessment of separate vs amalgamated in earlier sections of the document.;

Response: No; “two separate schools with headteachers”

Response: “Changing of head teacher”

Response: “None of these affect us at this time.”

Response: No; “Could you disclose what is considered as School causing concern?”

Response: No; “I don't believe these are good enough reasons to amalgamate schools”

Response: No; “Why should a school suffer because of another school's OFSTED inspection. This is down to the borough to support. Unfortunately borough support for all schools has reduced and reduced over the years. The borough need to ensure they are supporting.”

Response: Don't know; “I understand the reasoning behind amalgamation but have great concerns about children with SEN/D. Those children with sensory issues, would find the large numbers of children and the consequent noise levels a great challenge.”

Response: Don't know; “Is this a local standalone policy or a national view?”

Response: No; “How does this work in our school if one school has decided to join an academy?”

Response: No; “How would the policy work where one school is mainstream and one is in an academy? Does the policy still apply? Would amalgamation be possible, and what would that look like?”

Response: No; “If No or Don't Know please can you provide your comments below.”

Response: No; “19g- this is too open and not specifically defined”

Response: No; “The London Borough of Hillingdon will require Governing Bodies of all separate infant and junior schools to consider amalgamating their two linked schools when one or more of the following ‘trigger circumstances’ occur, unless there are compelling and overriding reasons: a) A headteacher vacancy arises in either or both schools. b) Total pupil numbers in either school are 25% or more below the Published Admission Number. c) Ofsted inspection in one of the schools identifies a ‘Requires Improvement’ judgement. d) One or both of the schools cannot set a balanced budget or has financial problems. e) One or both of the schools involved is judged to be a ‘School causing concern’ by the

London Borough of Hillingdon. f) One or both schools have PANs or are recruiting at below two forms of entry – making the individual schools relatively small and at risk of becoming unviable within the Hillingdon funding context. g) Other pressures whereby the educational provision would be improved through ;”

Response: Don't know; “If the Infant school remains mainstream whilst the Juniors is an academy will the policy still apply?”

Response: “How does the policy work if one school is mainstream the other an academy?”

Response: No; “The Governing body at our Infants school is extremely knowledgeable on all areas of the school’s setting. Personally, I feel amalgamating infant and junior bodies would impact the quality of the governing presently in place.”

Response: “I believe that this has previously been the case. Governors will always make considered judgements for their school as this is part of their own accountability. ;Yes”

Response: No; “How Will this work where one school is not LA? Our schools are seen as large by Ofsted as you are only comparing within Hillingdon not Nationally.”

Implementation

Response: No; “Point 21 - Seems that the LA are very clear that even though the policy is out for consultation, the policy will be put into place regardless”

Response: No; “21 is a tautologous argument as the 'advantages' as listed are singularly setting out the case for amalgamation and taken with point 23 is a fait accompli! Point 22 might not be allowed in the proposed scope of the NFF.”

Response: Don't know; “As foundation schools we have always been conscious of trigger points and, in the past, have discussed this with the LA after looking at financial factors etc especially when senior leaders leave.”

Response: No; “There is an apparent assumption that the LA would use its powers to impose amalgamation. There is no description of the spread of advice and consultation that would be required before any decisions were made.”

Response: No; "Some protection for at least one year" is vague and does not provide certainty. "Progress towards amalgamation will be presumed unless the educational advantages set out in this policy would not be delivered by combining the two schools" takes no account of any disadvantages that might result (again, and sorry to repeat, but lack of balance in earlier sections of the document!).

Response: “Changing of head teacher”

Response: No; “What if we choose to stay as we are for now?”

Response: “No; I've been through this process twice now and the consultation process with teaching staff was non existent.”

Response: No; “I am not in favour of amalgamation”

Response: “How would redundancies be covered? Points to a negative experience for staff in school.”

Response: No; “How would we cover redundancy costs? Surely this would place a huge financial strain on schools. How would this work in our circumstance if one school is mainstream and one academy?”

Response: Don't know; “How would redundancies be covered?”

Response: No; “How would we cover any redundancy costs caused by this? How would this work with one school that is mainstream and one that is an academy?”

Response: No; "Point 23- what if the MAT our junior school has decided to join does not fit our ethos and values?"

Response: No; "mentation 20. Discussions, advice, reports, and consultations about school organisation matters will be led by the Head of School Place Planning on behalf of the Director of Education. 21. Progress towards amalgamation will be presumed unless the educational advantages set out in this policy would not be delivered by combining the two schools. Both school Governing Bodies will need to work with the Local Authority to address any concerns and plan the timescale for amalgamation. The London Borough of Hillingdon will consider using the powers available to it to require amalgamation if there is a pressing case for this and Governing Bodies are not addressing the matters. 22. Newly amalgamated schools retain both lump sums in the year of amalgamation and then get some protection for at least one year (two if Schools Forum and DfE agree) and can choose to plan a longer phasing in of different changes; such as to policies, use of the building or staff structures; in order to maximise benefit"

Response: No; "Is there more likelihood of redundancies and if so how would this be funded?"

Response: No; "You talk about redundancies on what basis would this be done? Who would cover the cost of the redundancies?"

Response: No; "With reference to my comment on Parents View, the majority of parents feel an amalgamation would fail to deliver the quality of education, support and benefits their children receive in a junior setting only."

Response: "The implementation section states importantly that there would need to be an educational advantage therefore much would need to be reviewed to ensure that it did not in turn disadvantage children and their families."

Response: No; "The LA have put our school in this position by allowing academisation even though the local community were very against it and many of these points were raised at the time and we were told that we wouldn't have to join the same academy, this is disgusting that the Academy can get in by the back door as they have a foot in the camp."

Further comments

Response: "There should be a freeze on senior leader recruit in infant and junior schools particularly those facing amalgamation in the short term."

The LA should provide all effected schools with a timeframe for amalgamation.

To limit change and disruption, schools should go into a straight into a MAT as specified in the White Paper"

Response: "We already have links between the schools such as sharing the mobile facilities and holding joint training sessions. I think both schools are well managed with strong leadership. I have worked in a junior school, primary school and infant school. I feel the children benefit more from attending an infant and then junior school rather than a primary school as staff are more specialised in teaching those key stages. Subject coordinators can also concentrate on one key stage to develop rather than two which is beneficial. Both schools are great at what they provide and should be left to stay as separate infant and junior schools."

Response: "I would prefer more honesty in the policy - that the main reason for amalgamation is financial. If there was any pressing educational reason for amalgamation it should have happened a long time ago. If the policy draft was more upfront about this, I might have agreed with a lot more points; instead it seems to clutch at spurious reasons for amalgamation and comes across as dishonest."

Response: "There is a lack of balance in the overall proposal. It has strong theme of blame and judgement which is absent from Opportunity for All even though the Ofsted stats for LBH turn the percentages quoted by the minister in supporting academisation, on their head which means there is a great deal that is currently going well in LBH. That said, I do agree that the cumulative logistical and

financial pressures on some mainstream infant/junior schools will make delivering an outstanding service to our community extremely challenging if not insuperable.”

Response: “I agree a thorough review of educational advantages should be reviewed regularly and welcome LA advice and involvement. We also would like to record, should LA build new joint building we would have worked towards amalgamation 7 years ago. However, separating schools although on same site, has made the function more as separate schools. We did make representations at that stage.”

Response: “There are problems with falling rolls across the Borough but these affect academies as much a maintained schools. The schools least able to manage falling rolls are one form entry primary schools not separate infant and junior schools. The LA should be working closely with the regional schools commissioner to make plans for all schools in the Borough.”

Response: “Minet infant school has been an independent school since my kids studied there from 1994 - present, there’s no need for change it’s accommodating for the immediate diverse community at present and always has , if changes happen our children, our community will be at a loss , so please bear our families and local community in mind , minet serves a diversity like no other and we want to keep celebrating that as long as we can . Kind regards.”

Response: “I specifically choose to work in an Infants school. I think the children get more specialised attention by people who have lots of experience in that age group. It is a more secure environment for young children. Bigger is rarely better and young children get lost or inhibited in large establishments. The budgets can be better channelled fairly to each year group in split schools. Schools that work together make transition smooth and can share facilities anyway, they don't need to amalgamate to do this. An SLT including 1 SENDCO stretched across all of the Primary age groups would be too great of a workload. It’s bad enough as it is and always increasing. Teachers are adult enough to know that if they apply they will be working in a more limited age range - many of us choose that.”

Response: "Completely understand the need to consult and have a coherent policy on this and, as responsible GBs at our infant and junior school we will of course continue to consider amalgamation when appropriate. However, I think there are disadvantages as well as advantages and this document has ignored those which gives the impression that this is just about saving money not quality of education."

Response: “I don't believe this approach is the best way forward for children, teachers, and parents to ensure quality education for our children.”

Response: “Proposed Amalgamation was considered on three separate occasions in the past and deemed not viable by staff, governors, parents and school as a whole. My opinion has not changed since then and I do not support amalgamating Hillside and Junior schools.”

Response: “My own children’s school have gone through this recently in Hillingdon and it has been the best thing for the school, staff, families and ultimately the children. This needs to happen with Coteford.”

Response: “I think it will be a great idea, it will: help the community, consistency for the children and parents and allows teachers to work together rather than being two schools.”

Response: “I think it will be a real shame to get rid of Infant and Junior schools. They are very special places where children can grow and explore happily. The parents are very happy with what is happening and children enjoy heading to the junior school as they feel grown up. We do not get the same problems as all through primaries due to them finding things new and exciting and only staying their for 4 years. In Primary schools behaviour tends to get worse as children reach 5-6. This has caused a great deal of stress to staff and headteachers. I was appointed a year and a bit ago and do not wish to loose my job.”

Response: “In theory, amalgamation sounds good...until you apply it to individual schools, that is. I cannot see how Whiteheath Infants and Juniors pupils would benefit from amalgamating, since the economies of scale are simply not there. Physically they are further apart than is practicable. As a passionate teacher of KS1 and Early years, I cannot endorse this proposal.”

Response: "On paper this sounds great, however, I don't believe this would work. Infants and junior school operate differently, and they do so to cater for the children's needs. Some individuals at these types of schools may have experience working in their type of school, and therefore they may have little or no experience working in the other type of school. This will impact their understanding when asking to implement a policy or alter the way something is done.

This paper was written generically and therefore has not consider individual schools. The policy does state great benefits, however, how many times has this been done and what was the process like for the staff and the pupils? "

Response: "I totally disagree with the whole process. I believe it is letting children down. Children need small nurturing environments so they can be the best they can be, not so they can be a statistic. I have seen this process leave staff in tears and leave the profession. What were once supportive environments in which to work become too big and impersonal for staff. If one headteacher stays and another leaves this can be really difficult for the staff who worked under the headteacher that has left.

Financially, after the first year it becomes difficult as finances are cut. Long serving staff are often the first to go as schools look for a cheaper option. A school needs a balance of young and older staff.

Decisions in year groups and as a school become difficult as everything gets too large. Staff struggle to cope with such a wide curriculum.

In the two schools I have been through this process with I can honestly say that for the first 5 years it was horrendous and the whole experience deeply unsettling.

This is not an education decision, this is purely a financial decision which I find deeply upsetting."

Response: "Whilst it may be a difficult transition between the two schools, however, I feel it would be hugely beneficial for the children to have consistent teaching and practices from KS1."

Response: "I understand the financial difficulties that are occurring in a number of schools, however, this year there were a significant number of schools with surplus budgets beyond 8%. I am in favour of retaining the schools in phases as I believe that the outcomes are better for the child, the community engagement and children with SEN/D. Good or outstanding schools will not necessarily do better by amalgamating with schools that require improvement or have falling numbers. For the child, who needs to be considered beyond financial savings, surely a smaller classroom will help support them to thrive in their education?"

Response: "In addition to the points I have noted above, the overall policy does not present a balanced view or highlight any possible disadvantages."

Response: "As a Governing Board we consider it to be disappointing that the unique and specialist status an Infant / Junior School offers is not recognised by the local authority as being a positive and a strength."

Response: "There are inconsistencies throughout the policy and data is not a balanced. I am against the implementation of the amalgamation policy"

Response: "Introduction -

There are data errors throughout this section. The information provided lacks clarity and there is no apparent evidence for the statements made.

E.g. section 2 claims that - "Many pupils and schools have experienced high movement of pupils since Covid, and across London, primary school rolls have declined in the past few years and many now have some smaller year groups with fewer classes in." This is a completely generalised statement and is the complete opposite to the experience at our school.

Educational cases -

Again a general lack of clarity and data evidence shown in this section. A biased view of amalgamation is shown and does not reflect the reality of the partnership working already taking place in Hillingdon between schools.

Governance and Leadership -

There is no evidence to show that there is any difficulty in recruiting Governing bodies in Hillingdon. We are currently at full quota and there is no recognition that voluntary roles are generally more difficult to fill as standard. This should not be a reason to make a huge decision to amalgamate.

Parents View -

This section does not reflect the practical experience at our school. Who has been polled to gain these views and how was the decision made to represent their views as general statements in this proposal. Again, without evidence of how these views were gathered there is not grounding to what context they have been given.

There is a lack of clarity on what this section of the policy is referring to e.g. the word "structure" is used and it is not evident whether the people or the buildings are being reference.

Financial implications -

A couple of points to raise here -

- section 14 The use of the word 'most' is vague and it isn't clear who is being referenced.
- At our school we can demonstrate that shared purchasing and procurement activities already take place successfully and the borough is aware of this so unsure how point 15 is valid.
- How would this section be adapted to address schools who do not share a site?

Implementation -

- The issue of how redundancies would be covered should be addressed here.
- The process outlined points to a negative impact for staff in the schools.

Overall policy comments

Further to the above comments it is clear that this is a document that needs further work to provide clarity on a number of points and to ensure that Hillingdon looks at the individual schools in his borough before trying to implement a 'one size fits all' policy.

The policy contains many contradictions throughout, for example - 10 b. Separate infant and junior schools are disproportionately more likely to be graded Requires Improvement by Ofsted or to have budget deficits. VS Point 12. Whilst most Infant and Junior schools are graded Good or Outstanding by Ofsted

I am disappointed by the proposal and the short time that has been given for the 'consultation' stage. I would ask that the Borough consider carrying out real consultation sessions with schools that would be impacted by this. We all have the children's quality of education at the centre of our work and I do not feel that amalgamation implemented in this way would be beneficial to that goal.

I hope that, if you decide to carry out no further consultation, that comments are read and taken on board before anything is formally adopted.

Many thanks for taking the time to read this feedback."

Response: "As a school that was 'forced' by the LA to expand in 2013, to meet growing needs and numbers within Hillingdon, it now seems grossly unfair that such an amalgamation will be forced upon us, as a junior school, yet again. Whilst not in post at that stage, the school argued against such an expansion, preferring to operate on a system of bulge years if the need arose, but this was not supported by the LA, citing predicted growth of schools based on birth rates and other undisclosed figures. None

of this has been remotely apparent over the years and in fact, there is never shared information by School's Planning about predictions based on such intelligence that you as Hillingdon hold.

Since taking up the role as Headteacher in September 2016, we have broached the topic of capping years groups, allowing us to operate as three-forms of entry but this was never supported. Jointly, both infant and junior schools leaders and Governing Boards wrote joint letters to Dan Kennedy, wrote to Councillor Simmonds, and met with Sarah Phillips as the newly appointed Place Planning Advisor, but this had no effect on this decision-making process.

Since then, all conversations with both Dan Kennedy and Sarah Phillips have fallen silent, with Sarah now simply not responding to any of our school's correspondence on where we are with discussions on potential 'capping of numbers', leading us to the false sense of us simply continuing as 'business as usual' whilst strategically monitoring our unique year-group formations of 3/4/3/4 (for 21-22) and then 4/3/4/3 (for 22-23). Why and how has Hillingdon allowed this to happen?

The biggest issue discussed during these meetings was the forced expansions and the mobility issues that we face, largely centred around the affordability of housing within our catchment area, leading to many families being offered more permanent homes outside of Hillingdon or London. Our exit interviews are very clear in noting that none of our parents leave due to being dissatisfied with the quality of education offered by Whitehall Junior School. Whilst we serve the same community, each of our schools has its unique characteristics. How then do we justify forcing a merger of schools which operate in totally different ways and with totally different reputations within our local community?

Due to our unique characteristics and totally different leadership and management styles by the Whitehall Junior School's SLT and Governing Board, we have a strong and stable staffing body, allowing us to drive the standards that we currently maintain and in many ways, surpass. Such an amalgamation would destabilise our staffing body, particularly if I was not the one to stay on at the helm, resulting in many staff leaving our well-established school. We are the fabric of Whitehall Junior School and this is widely known in our local community who speak highly of our staff and how we bring about a uniqueness not seen in any other local school. What is extremely frustrating is that, until now, no mention of such amalgamations was out there for schools to consider. In fact, we are dumbfounded by the fact that such an important decision that solely affects infant and junior schools was not specifically discussed with us first. Instead, it was buried within a LA circular which is even more alarming as many of us had actually missed it amidst all other email content that we have to process daily.

We would much prefer a joint discussion with all parties concerned, allowing us to accurately assess each school's situation and factors directly affecting each school, before executing such a policy which could prove detrimental to the livelihoods of many stakeholders within our school communities. Given the lack of opportunity to fully understand the LA's rationale behind such a decision being made, and given that no meaningful conversations can take place over the summer break, we strongly urge that there be a delay in presenting it to cabinet."

Response: "I have read my schools views on proposed amalgamation. I do not agree for the above reasons this would be good for our school."

Response: "As an infant school I believe we can meet the needs of the children and we can prepare them for the next step to Juniors with confidence. We are well resourced and know the parents/carers which enables us to have positive relationships with them and enables us to have them working with us for the benefits of the children. How would this be the case if we amalgamated? The children are the most important people within a school and their needs should always be the number 1 priority and I believe that as an Infant school we do this very successfully."

Response: "Ofsted have graded most Infants school as 'Good' or 'Outstanding' which proves that the quality of teaching, resources, support and benefits these young children and their parents/carers receive, is clearly more superior than that of a Primary school setting."

Response: "It is important of course to review whether amalgamation would lead to a loss of pupils due to the size and nurturing of children. Furthermore it would be good to reflect on staff skills and expertise in curriculum and SEN. Different phases may automatically attract specialist staff who may

otherwise choose not to teach in an all through Primary. Is there any evidence already to suggest teachers have applied to transition from one phase to another in infant/ junior schools when there is a vacancy. In my own experience I am unaware of this. "

Response: "I do not agree with infant and junior schools amalgamating. I feel this would be detrimental to the children's mental wellbeing. I am unable to see the benefits of this and instead can see many negative impact this would have."

Response: "There are so many inaccuracies stated in the Amalgamation Policy, this is not founded in sound educational practice. Hillingdon is failing its Infant and Junior schools and losing the unique qualities that it used to offer parents and children."

POLICY FRAMEWORK: REVIEW OF STATEMENT OF GAMBLING POLICY

Cabinet Member(s)	Councillor Eddie Lavery
Cabinet Portfolio(s)	Cabinet Member Residents' Services
Officer Contact(s)	Daniel Ferrer, Residents' Services
Papers with report	<ul style="list-style-type: none"> • Overview of proposed policy changes - Appendix A • Draft Statement of Gambling Policy - Appendix B • Equality Impact Assessment - Appendix C

1.0 HEADLINE INFORMATION

Summary	<p>The Council's Statement of Licensing Policy is being reviewed, in accordance with legislative requirements and the Council's objectives.</p> <p>This report seeks Cabinet approval to undertake a six-week public consultation on the updated draft of this Policy.</p> <p>The Statement of Gambling Policy a 'Policy Framework document' and, therefore, under the law and the Council's Constitution, it requires final approval by full Council.</p>
Putting our Residents First	This Policy contributes to the Council's key objectives of: Our People; Our Built Environment; Our Heritage and Civic Pride.
Financial Cost	The resources required for the consultation can be met from existing budgets.
Relevant Select Committee	Residents' Services Select Committee
Relevant Ward(s)	All

2.0 RECOMMENDATIONS

2.1 That the Cabinet:

- a) Agrees to a public consultation for the draft Statement of Gambling Policy to take place between 12th September 2022 and 24th October 2022.
- b) Notes that a further report will be submitted to Cabinet, post consultation, highlighting any consultation responses for Cabinet to consider for inclusion in the final Policy
- c) Notes that the Statement of Gambling Policy is then required to be referred to the full Council for adoption as a policy framework document.

Reasons for recommendation

- 2.2 The review of the Statement of Gambling Policy and the accompanying consultation support effective and efficient delivery of licensing functions, in accordance with legislation and the Council's objectives, and allow for stakeholder views to be taken into account.

Alternative options considered / risk management

- 2.3 To not review the Policy nor undertake a consultation. If the policy was not reviewed and consulted on as required, then the Council would not meet its statutory obligations in this respect and legal challenges may follow.

Select Committee comments

- 2.4 None at this stage, though comments will be sought during the consultation process.

3.0 SUPPORTING INFORMATION

- 3.1 The Council is required to review its Statement of Gambling Policy at regular intervals to ensure it is carrying out licensing functions in accordance with current legislation. During this review, consideration has been given to how changes might improve the way in which services are being delivered, to make them more efficient and customer friendly.
- 3.2 A draft updated Statement of Gambling Policy has been produced. This Policy now needs to be consulted upon, prior to final consideration by full Council. An overview of this Policy and the reasons behind the review are detailed below.

What is the Statement of Gambling Policy?

3.3 The Gambling Act 2005 sets out how gambling in Great Britain is regulated. It came fully into force in September 2007, and covers arcades, betting shops, bingo premises, casinos, gaming machines, society lotteries, and remote gambling (including online gambling). It also created and set the functions and objectives of the Gambling Commission as the principal regulator. The Council is required to review the Statement of Gambling Policy every three years. The current policy was last formally reviewed in 2019 and therefore requires updating and adopting in 2022.

Updates made

3.4 In the intervening time there have been only minor changes to legislation and guidance and as such there are very few changes proposed to this policy. This has been incorporated into the revised policy.

3.5 Appendix A sets out a summary of the proposed changes which are mainly technical in nature. Minor wording changes have been made to the delegations relating to gambling functions, to make the draft Policy consistent with the recently approved Council Constitution. Additionally, a minor change is proposed to the Ward Councillor call-in procedure on gambling applications received, clarifying that representations made should set out how the application affects the 4 licensing objectives (as it does already for applications under the Licensing Act). Appendix B sets out the full draft revised policy showing the changes in detail, whilst Appendix C shows an Equality Impact Assessment of the changes proposed, for Cabinet's consideration.

Financial Implications

3.6 The consultation on the draft policy has no direct financial implications. There have been no legislative changes to the set licensing fees for Gambling licence applications. The fees remain statutory and have not altered since the Gambling Act was brought into force in September 2007. The resourcing of the consultation process can be met from existing budgets.

4.0 RESIDENT BENEFIT & CONSULTATION

- 4.1 The recommendations will give residents and businesses the opportunity to provide feedback to the Council on the proposed policy through the consultation process.
- 4.2 This report requests Cabinet approval for a public consultation on the policy. Following approval by Cabinet, the policy may be considered by the Licensing Committee, sub-committees of which make licensing decisions with reference to the policy.
- 4.3 As a policy framework document, the Residents' Services Select Committee will have the opportunity to submit comments on the policy prior to resubmission to Cabinet for consideration of responses received.
- 4.4 The draft policy will be sent to statutory consultees, Members of the Authority and any person on request. The draft policy will also be displayed on the Council's website. It is anticipated that Cabinet will be advised of the outcome of the consultations and presented with proposed final drafts of the policies at the scheduled meeting of 15th December 2022, with final full Council adoption in January 2023.

5.0 CORPORATE CONSIDERATIONS

Corporate Finance

- 5.1 Corporate Finance has reviewed this report and confirms that there are no direct financial implications associated with the recommendations within this report.

Legal

- 5.2 Legal Services confirm that there are no specific legal implications arising at the current time. Further, more detailed legal advice will be given as necessary once the outcome of the consultation is known.

6.0 BACKGROUND PAPERS

- [Current Statement of Gambling Policy](#)
- [Gambling Commission - Guidance to Licensing Authorities last updated May 2021](#)
- [Gambling Commission – Licence Conditions & Codes of Practice last updated Oct 2020](#)
- [Policy Paper – Review of the Gambling Act 2005 Terms of Reference and Call for Evidence, published December 2020](#)
- [Gambling Act 2005](#)

Appendix A - Overview of proposed policy changes

Draft Statement of Gambling Policy

The Council is required by the Gambling Act 2005 to review the Statement of Gambling Policy every three years. The current policy was last formally reviewed in 2019 and therefore requires updating and adopting in 2022.

In the intervening time there have been only minor changes to legislation and as such there are very few changes proposed to this policy.

The current policy works well and acts as a valuable framework for ensuring the principles of the legislation are upheld.

Policy amendments are shown at Appendix B underlined/~~strike through~~ and an overview of those that are material in nature are set out below:

- Front page – Effective dates amended
- Para 1.1, Line 6 “a” inserted before “Licensing Authority
- Para 1.3, bullet point 1. Addition of full name and section of current codes of practice.
- Para 1.4 added – to provide more detail of the effect of the statutory aim to permit gambling
- Para 1.9 added to provide detail on duration of Policy and any Review during this period.
- Para 1.12 – updated consultation dates.
- Old Para 1.12 – removal of word “and” in Declaration section.
- Para 1.15 – Deleting of “Regulatory Service” and amended to read “Licensing”
- Para 1.42 to 1.44 – new “Partnership Working” section added.
- Para 1.46(iii) – added to take into account any guidance issued by the Better Regulation Executive
- Para 1.48 – Added to be consistent with Government guidance re. test purchases
- Para 1.49 - Added to be consistent with Government guidance re. test purchases
- Para 1.51 – Added to clarify that enforcement will be carried out by authorised officers.
- Para 1.52 and 1.53 – Added to detail various enforcement policies.
- Old para 1.48 - Deleted
- Para 1.56 to 1.58 – Added new section re. the Equality Duty
- Para 1.59 & 1.60 – Added new section re. Modern Day Slavery
- Para 1.61 & 1.62 – Added new section re. Primary Authority scheme
- Para 1.63 – Added para re. Advertising of Gambling
- Para 1.64 – Added new section re. Human Rights Act
- Para 4.1 – amending of date
- Para 4.4 – Deletion of last sentence. No longer needed.
- Para 5.5 – 1st line, “the” deleted.
- Para 5.5 (i) & (ii) – amended to name specific codes and guidance.

- Para 5.7 – amended to recommend that all relevant British Amusement Catering Trade Association (BACTA) guidance is followed.
- Para 5.8 – Deleted as now covered by amended 5.7
- Para 5.9 – Deleted as now covered by amended 5.7
- Para 5.10 – grammar correction at line 2. “machine” amended to “machines”
- Para 5.40 – Amendment for correct page number for list of categories for gaming machines. Page number to be confirmed.
- Para 5.47 - Amendment for correct page number for list of categories for gaming machines. Page number to be confirmed.
- Para 5.64 - Amendment for correct page number for list of categories for gaming machines. Page number to be confirmed.
- Annex B – updated contacted details for the Responsible Authorities
- Annex C – Delegations, these are amended to reflect the same wording approved in the remodelled Council Constitution adopted in May 2022.
- Annex D – Amended to clarify process for ‘call-in’ of applications and representations from Ward Councillors to indicate how it adversely affects the 4 licensing objectives under the Gambling Act. This will also make it consistent with the wording for any call-in of an application under the Licensing Act 2003. Subject to full Council approval of the Policy it will also be requested to update this in the relevant part of the Council Constitution.

Page and paragraph numbers will be updated on the final policy document.



HILLINGDON

LONDON

Statement of Gambling Policy
The Gambling Act 2005

Effective –
2023-25

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**PART 1
THE GAMBLING ACT 2005**

INTRODUCTION

1.1 The London Borough of Hillingdon Council is the Licensing Authority under the Gambling Act 2005. This means that the Council is responsible for granting Premises Licences in respect of betting premises, bingo premises, casino premises, adult gaming centres and family entertainment centres as well as issuing a range of gaming permits and other authorisations for gambling within the Borough. As a Licensing Authority, we are also empowered under the Act to impose conditions and review licences, as well as take enforcement action when an offence under the Act has been committed or when premises or activities are unlicensed, or licence conditions are not complied with. This is coupled with powers of entry and inspection to ensure compliance.

The Licensing Framework

1.2 In exercising most of our decision-making functions we **must** have regard to the three Licensing Objectives set out in Section 1 of the Gambling Act, namely:

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- Ensuring that gambling is conducted in a fair and open way
- Protecting children and other vulnerable persons from being harmed or exploited by gambling

1.3 We are also bound by section 153 of the Act, which requires us, in making decisions concerning Premises Licences and Temporary Use Notices, to aim to permit the use of premises for gambling insofar as we think fit, subject to such decisions being:

- In accordance with any relevant code of practice ~~issued by the Gambling Commission under Section 24 of the Act, the Licence Conditions and Codes of Practice (LCCP)~~
- In accordance with any relevant guidance issued by the Gambling Commission
- Reasonably consistent with the licensing objectives; and
- In accordance with this Statement of Licensing Principles

◆1.4 The effect of this duty is that the Licensing Authority must approach our functions in a way that seeks to regulate gambling by using our powers to moderate its impact on the licensing objectives rather than initially starting out to preventing it all together.

The Policy

4.41.5 Section 349 of the Act requires us to publish a *Statement of Principles* (or policy) that we will apply when exercising our various functions under the Act. This Statement of Principles fulfils that statutory requirement and details throughout the

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document the Council's general approach to the making of licensing decisions.

~~4.51.6~~ Nothing in this policy will override the right of any person to make an application under the Act and have that application considered on its individual merits. Equally, nothing in this policy will undermine the right of any person to make representations on an application, or seek a review of a licence where there is a legal power to do so.

~~4.61.7~~ This document should be read in conjunction with the Act, Regulations made under the Act and Guidance issued by the Gambling Commission. Our Statement of Principles is designed to be a strategic (Gambling) Licensing Policy, not an operational guide to the Gambling Act or a guide to the application process.

~~4.71.8~~ This policy is supplemented by guidance documents for residents and the trade on the application and licensing process. These documents will assist applicants and objectors in understanding their rights and responsibilities under the Act in respect of:

- Applying for licenses and other gambling permissions.
- Making representations.
- Complaints about a premises licensed under the Act and review rights.
- Committee hearings and the decision making process.
- The information is available on the Council's website or on request by contacting the Licensing Authority.

~~1.9~~ The licensing authority's policy will have effect for a maximum of three years and must be reviewed thereafter, but the licensing may review and alter the Policy at any time during the three year period. Where the Policy is reviewed and changes proposed the licensing authority must consult on any revision.

CONSULTATION

~~4.81.10~~ The Council has, in accordance with the section 349(3) of the Gambling Act, consulted with:

- a. London Borough of Hillingdon Council Licensing Authority
- b. The Gambling Commission
- c. The Chief Officer of Police for the London Borough of Hillingdon
- d. London Fire & Emergency Planning Authority, Hillingdon Fire Station
- e. London Borough of Hillingdon Council Planning Authority
- f. Hillingdon Local Safeguarding Board
- g. HM Revenue and Customs
- h. Authority for Vulnerable Adults
- i. A Licensing Authority in whose area the premises are situated (*i.e. the Council itself and also any adjoining Council where premises straddle the boundaries between the two*).
- j. Persons who appear to this authority to represent the interests of persons carrying on gambling businesses in the borough of Hillingdon and neighbouring boroughs

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- k. Persons who appear to us to represent the interests of persons who are likely to be affected by the exercise of this authority's functions under the Gambling Act 2005

~~4.91.11~~ A comprehensive list of the persons and/or bodies we have consulted is attached at ~~Annex~~^{Appendix}-A. A summary of the consultation responses can be found on the Council's website. The full list of comments made and consideration given to those responses is available on request by contacting the Authority's Licensing Service.

~~4.101.12~~ Our consultation took place between ~~27th June~~ ^{12th September} and ~~24th October~~ ^{2022-8th August 2019}

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DECLARATION

1.12 In producing the final Statement of Principles, this Licensing Authority declares that it has had regard to the Licensing Objectives, ~~and~~ the Gambling Act 2005, the Guidance issued by the Gambling Commission and responses from those consulted on the policy statement.

AUTHORISED ACTIVITIES

1.13 Gambling' is defined in the Act as either gaming, betting or taking part in a lottery:

- (i) Gaming means playing a game of chance for a prize
- (ii) Betting means making or accepting a bet on the outcome of a race, competition, or any other event; the likelihood of anything occurring or not occurring; or whether anything is true or not true
- (iii) A Lottery is where persons are required to pay in order to take part in an arrangement, during the course of which one or more prizes are allocated by a process that relies wholly on chance.

1.14 Private gaming in private dwellings and on domestic occasions is exempt from licensing or registration providing that no charge is made for participating; only equal chance gaming takes place; and it does not occur in a place to which the public have access. Domestic betting between inhabitants of the same premises or between employees of the same employer is also exempt.

1.15 Non-commercial gaming and betting (where no parts of the proceeds are for private gain) may be subject to certain exemptions. Further advice should be sought from the Council's ~~Licensing Regulatory Service~~-Team where appropriate.

LICENSING AUTHORITY FUNCTIONS

1.16 Under the Act, the Council will be responsible for:

- Licensing of premises where gambling activities are to take place by issuing premises licences.
- Issuing Provisional Statements.
- Regulating Members' Clubs and Miners' Welfare Institutes who wish to undertake certain gaming activities via issuing club gaming permits and/or club machine permits.
- Issuing Club Machine Permits to commercial clubs.
- Granting permits for the use of certain lower stake gaming machines at unlicensed Family Entertainment Centres.
- Receiving Notifications from Alcohol Licensed premises (under the Licensing Act 2003) of the use of two or less gaming machines.
- Granting licensed premises gaming machine permits for premises licensed to sell/supply alcohol for consumption on the licensed premises, under the Licensing Act 2003, where more than two machines are required.
- Registering Small Society Lotteries below prescribed thresholds.
- Issuing Prize Gaming Permits.
- Receiving and endorsing Temporary Use Notices.
- Receiving Occasional Use Notices.
- Providing information to Gambling Commission regarding details of Licenses issued (see section on Information Exchange).
- Maintaining Register of Licenses and Permits issued under these functions.
- Exercising its powers of enforcement under the Act in partnership with the Gambling Commission and other relevant responsible Authorities.

1.17 It should be noted that licensing authorities are not involved in licensing remote gambling at all, which is regulated by the Gambling Commission via operating licenses.

RESPONSIBLE AUTHORITIES

1.18 These are generally public bodies that must be notified of all applications and who are entitled to make representations to the Council if they are relevant to the licensing objectives.

1.19 Within the meaning of Section 157 of the Act, those authorities are:

- a) London Borough of Hillingdon Council Licensing Authority.
- b) The Gambling Commission.
- c) The Chief Officer of Police for the London Borough of Hillingdon (where relevant, Chief Officer of Police for Heathrow).
- d) London Fire & Emergency Planning Authority, Hillingdon Fire Station.
- e) London Borough of Hillingdon Council Planning Authority.
- f) London Borough of Hillingdon Council Environmental Protection Unit (*i.e. authority responsible for pollution and harm to human health*).
- g) Hillingdon Local Safeguarding Board.
- h) HM Revenue and Customs.
- i) Authority for Vulnerable Adults.

- j) A Licensing Authority in whose area the premises are situated (*i.e. the Council itself and also any adjoining Council where premises straddle the boundaries between the two*).

For Vessels only:

Section 211(4) of the Act provides that the following are Responsible Authorities in addition to the authorities listed under section 157 of the Act:

- A. The Navigation Authority (*whose statutory functions are in relation to waters where the vessel is usually moored or berthed*)
- B. The Environment Agency,
- C. British Waterways and
- D. The Secretary of State for Digital, Culture, Media and Sport (DDCMS).

- 1.20 Subject to any other person being prescribed in Regulations by the Secretary of State. The contact addresses for these authorities are illustrated at [Annex Appendix C B](#), or available via the Council's website.

DESIGNATED BODY PROTECTING CHILDREN FROM HARM

- 1.21 The Council is required by regulations to state the principles it will apply in exercising its powers under Section 157(h) of the Act to designate, in writing, a body which is competent to advise the Licensing Authority about the protection of children from harm.
- 1.22 The principles are that:
 - (i) The designated body must be responsible for an area covering the whole of the Licensing Authority's area.
 - (ii) The designated body must be answerable to democratically elected persons, rather than any particular vested interest group etc.
- 1.23 In accordance with the Gambling Commission's Guidance for local authorities this authority designates the Local Safeguarding Children Board for this purpose.
- 1.24 The remit of the Board is to co-ordinate and scrutinise arrangements for safeguarding and promoting the welfare of Hillingdon's children. It operates throughout the Borough, is responsible for the area covered by the Licensing Authority and this Policy; and has specialist knowledge and experience in the protection of children to fulfil this role.

INTERESTED PARTIES

- 1.25 Interested parties can make representations about licence applications, or apply for a review of an existing licence. (see annex A with regard to Councillors making representations). For the purposes of the Gambling Act 2005 interested parties will include persons who:
- (i) Live sufficiently close to premises carrying out gambling activities.
 - (ii) Have business interests that might be affected; and
 - (iii) Represent persons listed above.
- 1.26 We are required by regulations to state the principles we will apply in exercising our powers under the Gambling Act 2005 to determine whether a person is an interested party. This Licensing Authority's principles are set out in the following paragraphs:
- 1.27 Each case will be decided upon its merits. We will not apply a rigid rule to our decision-making. In the case of doubt, the benefit will be given to the party making the representation until the contrary can be shown.
- 1.28 Interested parties can include trade associations and unions; and residents' or tenants' associations, providing that they can show they represent someone who would be classed as an interested party in their own right. Within the meaning of the Act, interested parties can also be persons who are democratically elected such as Councillors and MPs.
- 1.29 Generally, the principles we will apply when deciding whether or not a person is an interested party will include looking at the size of the premises where larger premises may be considered to affect people over a broader geographical area compared to smaller premises offering similar facilities and the nature of the activities being conducted on the premises. As to the different elements of the definition of "Interested Party", the Licensing Authority will take into account the following specific matters of principle:
- 1.30 Persons living "Sufficiently Close"**
- The Licensing Authority recognises "sufficiently close to be likely to be affected" could have a different meaning for, for instance, a private resident, a residential school for children with problems and a residential hostel for vulnerable adults and will therefore deal with each representation on its individual merits.
- 1.31 In determining whether someone lives sufficiently close to a particular premises as to likely to be affected by the authorised activities the Council may take account of the:
- (i) Size of the premises.

- (ii) Nature of the premises.
- (iii) Nature of the authorised activities being proposed.
- (iv) Distance of the premises from the person making the representation.
- (v) Characteristics of the complainant.
- (vi) Potential impact of the premises.

1.32 Persons with business interests likely to be affected

With regard to those persons with business interests that could be affected, the Licensing Authority will (in addition to the factors set out in paragraph 1.38 above) need to be satisfied that the relevant business is indeed likely to be affected and the following factors will therefore be taken into account:

- i) The 'catchment' area of the premises (i.e. how far people travel to visit);
- ii) Whether the person making the representation has business interests in that catchment area that might be affected.
- iii) Whether or not the representation is purely based on 'competition' as the Licensing Authority does not consider this to be a relevant representation.

1.33 Persons/bodies representing persons named above

With regard to persons representing persons living sufficiently close and persons having business interests that may be affected, the Licensing Authority will include trade associations and unions.

1.34 Where a Councillor represents an interested party, in order to avoid conflict of interest, the Councillor cannot be part of the Licensing Committee dealing with the licence application. When in doubt, Councillors are asked to contact the Council's Legal Services to gain further advice.

1.35 Other than Councillors and MPs, this authority will require written evidence that a person represents someone who either lives sufficiently close to the premises to be likely to be affected by the authorised activities and/or business interests that might be likewise affected. A letter from one of these persons confirming their wish to be represented will be sufficient.

Exchange of Information

1.36 Under the Gambling Act, we will have a key role in providing information to the Gambling Commission to assist it in carrying out its functions. This Licensing Authority recognises the need to work closely with the Gambling Commission in exchanging information as and when required.

1.37 As Licensing Authority we are required to include in our policy statement the principles we intend to apply in exercising the functions under sections 29 and 30 of the Act with respect to the exchange of information between us and the Gambling Commission, and the functions under section 350 of the Act with

respect to the exchange of information between us and the other persons listed in Schedule 6 to the Act.

Statement of Principles

- 1.38 This Licensing Authority will act in accordance with the provisions of the Gambling Act 2005 in its exchange of information which includes the provision that the General Data Protection Regulations 2018 will not be contravened. The Licensing Authority will also have regard to any Guidance issued by the Gambling Commission to Local Authorities on this matter, as well as any relevant regulations issued by the Secretary of State under the powers provided in the Gambling Act 2005.
- 1.39 Details of applications and representations which are referred to a Licensing Sub-Committee for determination will be published in reports that are made publicly available in accordance with the Local Government Act 1972 and the Freedom of Information Act 2000. Personal details of people making representations will be disclosed to applicants and only be withheld from publication on the grounds of personal safety where the Licensing Authority is asked to do so.
- 1.40 The Licensing Authority will normally share the information it holds about licensed premises with the Gambling Commission, Local Police Enforcement in Hillingdon; and with other Responsible Authorities where there is a need for exchange of information on specific premises.
- 1.41 We are aware that the Gambling Commission recommends in its Guidance to Local Authorities that a Protocol for the sharing of such information should be established between, us, the Licensing Authority, the Gambling Commission itself and relevant Responsible Authorities in order to target agreed problem and high risk premises that require greater attention while providing a lighter touch in respect of well-run, low risk premises.

Partnership Working

- 1.42 The local authority shall work in partnership with the ~~Commission~~ Gambling Commission to regulate gambling. In doing so the ~~Commission~~ Commission will tend to focus on operators and issues of national or regional significance whilst the Licensing Authority will take the lead on regulating gambling locally.
- 1.43 The Commission and licensing authorities may work directly together on particular issues. By working in collaboration jointly we are able to prevent such risks growing into a more widespread problem and to ensure that both the Commission and Licensing Authority resources are used efficiently.
- 1.44 Licensing authorities should aim to work with local businesses to reduce the risk to the licensing objectives to acceptable levels. The Act does not envisage regulation by either the Commission or licensing authorities being aimed at preventing legitimate gambling.

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Enforcement

[4.421.45](#) Licensing authorities are required by regulation under the Gambling Act 2005 to state the principles to be applied by the authority in exercising the functions under Part 15 of the Act with respect to the inspection of premises; and the powers under section 346 of the Act to institute criminal proceedings in respect of the offences specified.

[4.431.46](#) This Licensing Authority's principles are that:

- (i) It will be guided by the Gambling Commission's Guidance for local authorities and it will endeavour to be:

- Proportionate: we will only intervene when necessary, remedies will be appropriate to the risk posed, and costs identified and minimised.
 - Accountable, with decisions being justifiable, and be subject to public scrutiny.
 - Consistent: rules and standards will be joined up and implemented fairly.
 - Transparent and Open: Licence conditions will be kept simple and user friendly.
 - Targeted: regulation will be focused on the problem, and minimise side effects.
- (ii) The Council will avoid duplication with other regulatory regimes so far as possible.
- (iii) This licensing authority will also keep itself informed of developments as regards the work of the Better Regulation Executive in its consideration of the regulatory functions of local authorities. Furthermore, the licensing authority will take into account any guidance issued by the Better Regulation Executive.
- (iv) We note the Gambling Commission's guidance that: in order to ensure compliance with the law, this Licensing Authority must prepare a Risk - based Inspection Programme and that we carry out regular 'routine' day time programmed inspections, based on risk assessment in the categories High, Medium and Low; and that we also carry out 'non routine' evening programmed inspections. Where one-off events are taking place under a Temporary Use Notice or Occasional Use Notice, the Licensing Authority may also carry out inspections to ensure the Licensing Objectives are being promoted.
- (v) High-risk premises are those premises that require greater attention with low risk premises needing only a lighter touch so that resources are effectively concentrated on problem premises.

1.47 Enforcement may include test purchasing activities to measure compliance of licensed operators with aspects of the Gambling Act. When undertaking test purchase activities, this licensing authority will undertake to liaise with the Gambling Commission and the operator to determine what other, if any, test purchasing schemes may already be in place. Irrespective of the actions of an operator on their overall estate, test purchasing may be deemed an appropriate course of action.

1.48 The Licensing Authority, should consult with operators in the first instance where they have concerns about the underage access and age verification policies or whose premises they plan to test purchase. This will enable the Licensing Authority to identify what programmes are in place to manage the business risk and take these into account in planning a test purchase exercise.

4.441.49 The Licensing Authority should consult with the Gambling Commission before

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undertaking any test purchasing operations. This is to ensure that there is no conflict between any ongoing investigation or enforcement activity related to either the premises or the operator. Furthermore, the Licensing Authority shall share any test purchasing results with the Gambling Commission.

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1.50 The main enforcement and compliance role for this licensing authority in terms of the Gambling Act 2005 will be to ensure compliance with the Premises Licences and other permissions which is authorises.

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1.51 Authorised persons of the licensing authority exercise their inspection powers in accordance with the Act, the guidance and the principles set out in the licensing authority's policy.

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1.52 Any enforcement action taken in relation to the duties of this Licensing Authority under the Gambling Act 2005 will comply with the London Borough of Hillingdon Council's current 'Prosecutions and Sanctions Policy'.

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1.53 Enforcement Officers will also comply with 'The Code for Crown Prosecutors published by the Crown Prosecution Service which can be accessed at:

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4.45 <https://www.cps.gov.uk/publication/code-crown-prosecutors>

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4.461.54 The Gambling Commission will be the enforcement body for the Operator and Personal Licences. Concerns about manufacture, supply or repair of gaming machines will not be dealt with by the licensing authority but will be notified to the

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Gambling Commission. This authority also understands that the Gambling Commission will be responsible for compliance as regards unlicensed premises.

~~4.471.55~~ In considering enforcement action, the Licensing Authority will bear in mind the Human Rights Act 1998, in particular:

- i) Article 1 of the First Protocol: that every person is entitled to the peaceful enjoyment of his or her possessions, including for example the possession of a licence.
- ii) Article 6: that in the determination of civil rights and obligations everyone is entitled to a fair hearing within a reasonable time by an independent and impartial tribunal established by law.
- iii) Article 8: that everyone has the right to respect for his or her home and private family life.
- iv) Article 10: that everyone has the right to freedom of expression within the law.

~~1.48 Any decision to instigate enforcement action and/or legal proceedings will take account of the criteria set down in the Regulators Code, Code of Crown Prosecution and Attorney General Guidelines.~~

Equality Duty

~~1.56 The Licensing Authority have a public sector equality duty to the following protected characteristics:~~

- Age
- Disability
- Sex, gender reassignment, sexual orientation
- Pregnancy and maternity
- Race, religion or belief
- Marriage and civil partnership

~~1.57 Under the Equality Act 2020 (S.149) a Public Authority must, in the exercise of its functions, have due regard to the need to:-~~

- ~~(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the 2010 Act~~
- ~~(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it~~
- ~~(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it~~

~~1.58 The Licensing Authority has considered the Equality and Diversity issues that may~~

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arise from the Policy. The Local Authority considers that this policy does not raise any concerns with regards to equality and diversity.

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Modern Day Slavery

1.59 The Licensing Authority acknowledges the implementation of the Modern Day Slavery Act 2015 and will therefore fully take on their responsibilities and statutory duties under the Act.

1.60 This Licensing Authority recognises the role it can play in proactively preventing modern slavery, which includes consideration of:-

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- Identification and referral of victims during inspections and visits
- Reporting and referring for investigation via the National Crime Agency's national referral mechanism any of its licence holders or managers of premises as a cause for concern
- Assisting partners with Community safety services and disruption activities.

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Primary Authority

1.61 The Primary Authority (PA) scheme, administered by the Office for Product Safety and Standards provides for a statutory partnership to be formed between a business and a single authority. That single authority, the PA, can provide a national inspection strategy within which other local regulators can operate (Primary Authority statutory guidance), to improve the effectiveness of visits by local regulators and enable better sharing of information between them. The PA scheme therefore aims to ensure that local regulation is consistent at the national level.

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1.62 Since October 2013, the PA scheme has been extended to include age-restricted sales of gambling in England and Wales. It does not apply to any other aspect of the Act. This means that the Licensing Authority must follow any age restricted sales of gambling national inspection plans and strategies that are published on the PA register when considering proactive age restricted sales (gambling) activity including testing.

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Advertising

1.63 The Act permits the advertising of gambling in all forms, provided that it is legal and there are adequate protections in place to prevent such advertisements undermining the licensing objectives. The Advertising Standards Authority (ASA) is the UK's independent regulator of advertising. It enforces the UK Advertising Codes (the Codes), written by the Committees of Advertising Practice. The Codes cover the content and placement of advertising and are designed to ensure that advertisements for gambling products are socially responsible, with particular regard to the need to protect children, young persons under 18 and other vulnerable persons from being harmed or exploited. The Codes also require that

advertisements for gambling products or services do not mislead. Any complaint about the content and placement of advertising or marketing communications should be sent directly to the ASA.

Human Rights

1.64 When considering applications and taking enforcement action, the Licensing Authority will be subject to the Human Rights Act 1998 and should bear in mind:

- Article 1 – peaceful enjoyment of possessions.
- Article 6 – right to a fair hearing
- Article 8 – respect for private and family life
- Article 10 – right to freedom of expression

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**PART 2
PROMOTING THE LICENSING OBJECTIVES**

2.1 In exercising its functions under the Gambling Act 2005, London Borough of Hillingdon Council will have regard to the three statutory licensing objectives, which are:

- (i) Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
- (ii) Ensuring that gambling is conducted in a fair and open way.
- (iii) Protecting children and other vulnerable persons from being harmed or exploited by gambling.

2.2 In promoting these objectives, the Council has considered the Gambling Commission's Guidance to Local Authorities and makes the following observations as to the principles it intends to apply when considering the three objectives:

PREVENTING GAMBLING FROM BEING A SOURCE OF CRIME OR DISORDER, BEING ASSOCIATED WITH CRIME OR DISORDER OR BEING USED TO SUPPORT CRIME.

2.3 The Gambling Commission will play a leading role in preventing gambling from being a source of crime and will maintain rigorous licensing procedures that aim to prevent criminals from providing facilities for gambling.

2.4 Anyone applying to the Council for a Premises Licence will have to hold an Operating Licence from the Gambling Commission before a licence can be issued. Therefore, the Council will not generally be concerned with the suitability of an applicant. However, if during the course of considering a Premises Licence application or at any other time, the Licensing Authority receives such information that causes it to question the suitability of the applicant; those concerns will be brought to the immediate attention of the Gambling Commission.

2.5 If an application for a licence or permit is received in relation to premises which are in an area noted for particular problems with organised crime or crime directly associated with gambling premises, the Council will, in consultation with the Police and other relevant Responsible Authorities, consider whether specific controls need to be applied to prevent those premises from being a source of crime. In appropriate circumstances, the Licensing Authority may consider appropriate conditions to be attached to the Licence, such as Door Supervisors.

2.5
2.6 Issues of disorder should only be dealt with under the Act if the disorder amounts to a form of activity, which is more serious and disruptive than mere nuisance and it can be shown that gambling is the source of that disorder. A disturbance

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might be serious enough to constitute disorder if police or ambulance assistance was required to deal with it. Another factor which could be taken into account is how threatening the behaviour was to those who could see or hear it, and whether those people live sufficiently close to be affected or have business interests that might be affected.

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- 2.7 The Licensing Authority recognises that disorder may be focused on premises and therefore recommends an applicant takes such controls as necessary to prevent such disorder and nuisance. Examples may include thought given to the way that gambling is conducted on the premises, sighting of large payout machines, levels of noise from public address systems that should ideally be sited at the back of the premises away from residential areas.
- 2.8 Where there are persistent levels of disorder, the Licensing Authority will liaise closely with the Gambling Commission to consider the suitability of the applicant as an operator. In addition, the Licensing Authority will strive to have a good working relationship with the Police in accordance with any protocol that is currently in place.

ENSURING THAT GAMBLING IS CONDUCTED IN A FAIR AND OPEN WAY

- 2.9 All gambling should be fair in the way it is played with transparent rules such that players know what to expect. Examples may include easily understandable information being made available on the rules and probability of winning/losing, ensuring the rules are fair and that advertising is not misleading. Further recommendations would be to ensure that the results of competitions/events are made public; and that machines, equipment and software meet the required standards set by the Gambling Commission.
- 2.10 Generally, it is for the Gambling Commission to ensure this Licensing Objective is complied with through the Operating and Personal Licence regime covering the management of a gambling business and the suitability and actions of an individual.
- 2.11 However, with regard to Race Tracks, where Betting Track Operators do not need an Operator's Licence from the Gambling Commission, the role of the Licensing Authority is more significant. The Licensing Authority, in certain circumstances, may seek to impose conditions to ensure that the environment in which betting takes place is suitable. The Licensing Authority may wish to know the nature of the venue, have sight of a plan of the track which would include access to the tent where gambling is to take place, where the operators will conduct on course betting and whether or not there are any off course betting operators.

PROTECTING CHILDREN AND OTHER VULNERABLE PERSONS FROM BEING HARMED OR EXPLOITED BY GAMBLING

- 2.12 Apart from one or two limited exceptions, the intention of the Act is that children and young person's should not be allowed to gamble and should therefore be prevented from entering gambling premises which are 'adult-only' environments.
- 2.13 This Authority notes and endorses the Gambling Commission statement that: "The requirement in relation to children is explicitly to protect them from being harmed or exploited by gambling".
- 2.14 In practice, steps will generally be taken to prevent children from taking part in, or being in close proximity to, gambling, where they are not legally permitted to do so, especially with regard to premises situated in areas where there may be a high rate of reported truancy. There may also be restrictions on advertising so that gambling products are not aimed at children or advertised in such a way that makes them particularly attractive to children. The advertising of Gambling services is regulated by the Gambling Commission under the Gambling (Licensing and Advertising) Act 2014. In relation to casinos only, the Gambling Commission will be issuing a code of practice about access to casino premises for children and young persons.
- 2.15 When considering whether to grant a premises licence or permit the Council will consider whether any measures are necessary to protect children or vulnerable young persons from being harmed or exploited by gambling, such as the supervision of entrances, the segregation of gambling from areas frequented by children and the supervision of gaming machines in non-adult gambling specific premises, such as pubs, clubs, betting tracks etc. These measures will be particularly relevant on mixed use premises, tracks where children have freedom of movement in betting areas on race days and in particular to the non-gambling areas of casinos. Other such measures may include appropriate signage, location of machines and numbers of staff on duty.
- 2.16 Whilst the Gambling Act does not prohibit vulnerable groups in the same manner as children and young persons, with regard to vulnerable people, the Licensing Authority will consider whether or not any measures have been taken to protect such a group. Any such considerations will be balanced against the Licensing Authority's aim to permit the use of premises for gambling; each application will be treated on its own merit. The term "vulnerable persons" has not been defined under the Act, but in seeking to protect vulnerable people the Council will consider that "vulnerable persons" include (but not limited to):
- (i) People who gamble more than they want to.
 - (ii) People who gamble beyond their means, and
 - (iii) People who may not be able to make informed or balanced decisions about gambling, perhaps due to a mental impairment, alcohol or drugs.
- 2.17 Gambling operators will be expected to demonstrate that they have adequate training and staffing procedures in place to ensure that vulnerable persons are

protected from gambling related harm. Staff working at gambling premises will also need to be aware of challenges present in the local area and vicinity of the licensed premises which may impact on the protection of children and vulnerable persons.

- 2.18 Children (defined in the Act as under 16s) and young persons (16-17s) may take part in private and non-commercial betting and gaming but the Act contains a number of restrictions on the circumstances in which they may participate in gambling or be on premises where gambling is taking place. An adult is defined as 18 and over. In summary:
- i) Betting Shops cannot admit anyone under the age of 18.
 - ii) Bingo Clubs may admit those under the age of 18 but must have policies to ensure they do not gamble, except on category D machines.
 - iii) Adult Entertainment Centres cannot admit those under the age of 18.
 - iv) Family Entertainment Centres and premises with an alcohol premises licence such as pubs) can admit under-18s, but they may not play category C machines which are restricted to those over the age of 18.
 - v) Clubs with a Club Premises Certificate can admit under-18s, but they must have policies to ensure those under the age of 18 do not play machines other than category D machines.
 - vi) Tracks will be required to have policies to ensure that under 18s do not participate in gambling other than on category D machines.
- 2.19 With this Licensing Objective in mind, the Licensing Authority will take particular care when considering applications for more than one licence for a building and those relating to a discrete part of a building used for other non-gambling purposes, such as shopping malls or airport terminals. Where relevant, applicants will be expected to take measures to ensure young persons, and children are not in close proximity to gambling. Such measures could include sighting machines at the back of a premises so as to ensure young children do not have sight of such machines, not advertising gambling so as to encourage children and ensuring there is no accidental access to observe or enter premises used for gambling.
- 2.20 The Licensing Authority recommends that measures are taken to ensure entrances and exits from parts of a building covered by one or more licences are separate and identifiable so that people do not drift into a gambling area in error. Such measures could include appropriate signage, physically separating Family Entertainment Centres and Adult Gaming Centres, and supervision of entrances.
- 2.21 The Licensing Authority will pay particular attention to applications where access to the licensed premises is through another premises and will consider whether or not children can gain access; the compatibility of the two establishments and its ability to comply with the requirements of the Gambling Act. The Licensing Authority will also consider whether the co-location of the licensed premises with

other facilities will create an arrangement that is likely to be prohibited under the Act.

- 2.22 The Licensing Authority will consider multiple licences carefully and applicants are recommended to configure these buildings carefully if they seek to develop multipurpose developments and in particular consider how they will protect children from being harmed by gambling as well as preventing children from being in close proximity to gambling. Applicants are also requested to consider entrances and exits from parts of the building covered by one or more licences. These exits and entrances should be separate and identifiable to ensure children do not 'drift' into a gambling area.
- 2.23 The Licensing Authority recommends that all staff are suitably trained and aware of the Gambling laws, social responsibility and statutory requirements related to age restrictions on gaming machines. Appropriate measures should be taken to prevent under age use of such machines, including clear and appropriate signage, an approved Proof of Age scheme, a requirement for staff to be vigilant and aware at all times and ensuring the Adult Gaming area is not visible from the street.
- 2.24 The Council will always treat each case on its own individual merits and when considering whether specific measures are required to protect children and other vulnerable people it will balance its considerations against the overall principle of aiming to permit the use of premises for gambling.
- 2.25 When determining the location of proposed gambling facilities, this Licensing Authority in appropriate circumstances, will have regard to any Local Risk Assessment detailed in this policy and will consider very carefully the following factors when considering applications for Premises Licences, permits and other permissions:
- i) Proximity of premises to local schools.
 - ii) Proximity of premises to centres that pose a high risk to vulnerable and young persons.
 - iii) Proximity of premises to residential areas where there is a high concentration of children and young people.

PART 3
INTEGRATING STRATEGIES AND OTHER REGULATORY REGIMES

INTEGRATING STRATEGIES

- 3.1 The Council considers that the Licensing Statement of Principles should provide clear indications of how we, as Licensing Authority, will secure the proper integration of this policy with local crime prevention, planning, transport, tourism, equalities and diversity schemes together with other Council plans introduced for the management of town centres and the night-time leisure economy. Many of these strategies are not directly related to the promotion of the three licensing objectives, but indirectly impact upon them. Coordination and integration of such policies, strategies and initiatives, so far as is possible and consistent with the licensing objectives, is therefore important to us. We will liaise with the relevant authorities or its directorates with regard to this and in doing so adopt a multi-disciplinary approach to ensure proper integration of local and national strategies to promote the licensing objectives, including making arrangements for the Council's Licensing Committee to receive reports from time to time on the:
- i) Needs of the local tourist economy;
 - ii) Cultural strategy for the area;
 - iii) Employment situation in the area and the need for new investment and employment where appropriate;
 - iv) Local Crime Prevention Strategies;
 - v) Race Equality Schemes;
 - vi) Enforcement Policy.
- 3.2 Reports to the Licensing Committee from other relevant departments should enable the various agencies or departments with their own strategies, aims and objectives to keep the Licensing Committee aware of the wider picture in pursuance of the licensing objectives. It is our intention that we will, through the Council's Licensing Committee, monitor how the matters above set out impact on the licensing of gambling activities and facilities and other functions in order to achieve seamless integration of our licensing function with other relevant strategies and initiatives.
- 3.3 In order to avoid duplication with other statutory regimes, the Licensing Authority will not attach conditions to a licence unless they are considered necessary for the promotion of the licensing objectives. Conditions will generally be considered unnecessary if they are already adequately covered by other legislation.
- 3.4 Similarly, where other legislation confers powers on inspection and enforcement agencies in relation to separate activities and concerns relating to licensed premises, this policy does not affect the continued use of such powers by the relevant agency.

- 3.5 This authority will seek to avoid any duplication with other statutory or regulatory systems where possible, including the statutory planning regime.
- 3.6 We emphasise that under section 210 of the Act this Licensing Authority is not entitled to have regard to whether or not a proposal by the applicant is likely to be permitted in accordance with the law relating to planning or building control.
- 3.7 The Planning Department are a Responsible Authority under this Act and have the opportunity to make representations should they desire so to do. The Licensing Authority will therefore consider relevant representations from the local planning authority about the effect of the grant of a premises licence on an extant planning permission where this relates to the licensing objectives, a Commission code of practice, or this Statement of Policy. This authority will also listen to, and consider carefully, any concerns about conditions that cannot be met by licensees due to planning restrictions, should such a situation arise. Otherwise the two regimes will be treated as completely separate.

PART 4

LOCAL RISK ASSESSMENTS AND LOCAL AREA PROFILE

Local Risk Assessments

- 4.1 The Gambling Commission's Licence Conditions and Code of Practice (LCCP) which were revised and published ~~in in February 2015~~ October 2020 formalised the need for operators to consider local risks.
- 4.2 Social Responsibility (SR) code 10.1.1 requires licensees to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and to have policies, procedures and control measures to mitigate the risks. In undertaking the risk assessments, they must take into account the relevant matters identified in this policy statement.
- 4.3 Licensees are required to undertake a local risk assessment when applying for a new premises licence. ~~There~~Their risk assessment must also be updated:
 - When applying for the variation of a premises licence.
 - To take account of significant changes in local circumstances, including those identified in this policy statement.
 - Where there are significant changes licensee's premises that may affect their mitigation of local risks.
- 4.4 The SR provision is supplemented by an ordinary code provision that requires licensees to share their risk assessment with the licensing authority when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise at the request of the licensing authority. ~~Both provisions take effect from 8 May 2015~~
- 4.5 Where concerns do exist, perhaps prompted by new or existing risks, the licensing authority will request that the licensee share a copy of its own risk assessment which will set out the measures the licensee has in place to address specific concerns. This practice should reduce occasions on which a premises review and the imposition of licence conditions are required.
- 4.6 Where this policy statement sets out its approach to regulation with clear reference to local risks, the licensing authority will facilitate operators being able to better understand the local environment and therefore proactively mitigate risks to the licensing objectives. In some circumstances, it might be appropriate to offer the licensee the opportunity to volunteer specific conditions that could be attached to the premises licence.

Local Area Profile

- 4.7 The licensing authority can complete their own assessment of the local environment as a means of 'mapping out' local areas of concern, which will be reviewed and updated to reflect changes to the local landscape. Such an assessment is known as the local area profile. There is no statutory duty on the licensing authority to complete a local area profile; however benefits for both the licensing authority and operators would be in having a better awareness of the local area and risks. Importantly, risk in this context includes potential and actual risk, thereby taking into account possible future emerging risks, rather than reflecting current risks only.
- 4.8 There is no mandatory requirement to have a local area profile and the licensing authority will, where appropriate, engage with responsible authorities ensure any new or variation application assessed taking the local area profile and any risks into account.

PART 5 PREMISES LICENCES

GENERAL PRINCIPLES

- 5.1 Premises Licences authorise the provision of gambling facilities on the following:
- i) Casino Premises.
 - ii) Bingo Premises.
 - iii) Betting Premises, including race tracks used by betting intermediaries
 - iv) Adult Gaming Centres.
 - v) Family Entertainment Centres.
- 5.2 Except in the case of Tracks (where the occupier may not be the person offering gambling), Premises Licences will only be issued to people with the relevant Operating Licences.
- 5.3 Premises Licences will be subject to the permissions/restrictions set out in the Gambling Act 2005 and regulations, as well as specific mandatory and default conditions which will be detailed in regulations issued by the Secretary of State.
- 5.4 We as the Licensing Authority will be able to exclude default conditions and also attach other conditions, where we believe it to be appropriate.
- 5.5 Under the ~~Act the Hillingdon~~[Act Hillingdon](#) Council has no discretion to grant Premises Licences in circumstances where that would mean departing from the Gambling Commission Guidance and Codes of Practice and this Licensing Authority's own Statement of Licensing Principles. Therefore, our primary focus shall be to aim to permit the use of premises for gambling in so far as we think it is:
- i) In accordance with ~~any relevant Code of Practice~~ the 'Licence Conditions and Codes of Practice', issued by the Gambling Commission.
 - ii) In accordance ~~with any relevant Guidance with the~~ 'Guidance to Licensing Authorities', issued by the Gambling Commission.
 - iii) Consistent with the Licensing Objectives.
 - iv) In accordance with this Statement of Licensing Principles.
- 5.6 The Council appreciates that gambling can be an emotive subject but acknowledges and endorses the Gambling Commission Guidance that "moral objections to gambling are not a valid reason to reject applications for premises licences " (except as regards any "no casino resolution") and also that unmet demand is not a criterion for a Licensing Authority.
- 5.7 We recognise that the responsibility for an individual's gambling is his or her own and that the responsibility to exercise a duty of care lies with the site operator. However, the Licensing Authority recommend applicants for Adult Gaming

and Family Entertainment Centres to consider adopting relevant guidance published by the British Amusement Catering Trade Association (BACTA)~~BACTA's Code of Social Responsibility and Good Practice and where gaming machines are concerned, applicants are recommended to adopt BACTA's Code of Practice for AWP's in Family Entertainment Centres and Adult Gaming Centres.~~

~~5.8 Where there are age restrictions on entry to certain premises, the Licensing Authority recommends applicants consider and adopt BACTA's and GamCare's joint training initiative on a Site Age of Entry Control Policy.~~

~~5.9 We also recognise that most customers are able to enjoy and control their gambling, however, where there are those who are unable to control gambling, the Licensing Authority recommends that applicants adopt BACTA's and GamCare's Site Self-Exclusion Policy for those particular clients to request their exclusion for a fixed period.~~

Definition of Premises

~~5.105.8~~ The Council will act in accordance with the gambling commission guidance on ensuring the primary activity of the licensed premises. Gaming machines may be available in licensed betting premises only at times when there are also sufficient facilities or betting operators. They will also need to demonstrate that betting will continue to be the primary activity of a premise when seeking variations to licences.

In making this determination, the licensing authority will have regard to the six indicators on betting as a primary gambling activity:

- The offer of established core product (including live events pictures and its range).
- The provision of information on products and events.
- The promotion of gambling opportunities and products.
- The actual use made of inspecting facilities.
- The size of premises.
- The delivery of betting facilities.

~~5.115.9~~ Premises are defined in the Act as "any place". Different premises licences cannot apply in respect of a single premise at different times. It is however possible for a single building to be subject to more than one premises licence, providing that each licence is for a different part of the building and such different parts can reasonably be regarded as different premises.

~~5.125.10~~ The Council will judge each case on its individual merits to decide as a matter of fact, whether different parts of a building can be properly regarded as being separate premises.

In addition to other relevant factors, the Council will have regard to the Gambling Commission guidance which lists the following factors which may be taken into account:

- Do the premises have a separate registration for business rates?
- Is the premises' neighbouring premises owned by the same person or someone else?
- Can each of the premises be accessed from the street or public passageway?
- Can the premises only be accessed from another gambling premises?

5-135.11 We note that the Gambling Commission, in their guidance, do not consider that areas of a building that are artificially or temporarily separate can be properly regarded as different premises. We support this view.

5-145.12 This licensing authority takes particular note of the Gambling Commission's Guidance for Local Authorities, which states that:

- i) Licensing Authorities should take particular care in considering applications for multiple licences for a building and those relating to a discrete part of a building used for other (non-gambling) purposes. In particular, they should be aware that entrances and exits from parts of a building covered by one or more licences should be separate and identifiable so that the separation of different premises is not compromised and that people do not 'drift' into a gambling area.
- ii) Licensing authorities should pay particular attention to applications where access to the licensed premises is through other premises (which themselves may be licensed or unlicensed). Clearly there will be specific issues that authorities should consider before granting such applications, for example, whether children can gain access; compatibility of the two establishments; and the ability to comply with the requirements of the Act. But in addition an overriding consideration should be whether, taken as a whole, the co-location of the licensed premises with other facilities has the effect of creating an arrangement that otherwise would, or should, be prohibited under the Act.

Provisional Statement

5-155.13 Under the Act an applicant may apply for a Provisional Statement where a premises is under construction. The Gambling Commission has advised that reference to the term, "the premises" are to the premises in which gambling may now take place. Therefore a licence to use premises for gambling will ~~only~~ be

issued in relation to premises that are ready to be used for gambling **or are intended to be used for gambling.**

[5-165.14](#) It is a question of fact and degree whether premises are finished to a degree that they can be considered for a premises licence. The Gambling Commission emphasises that requiring the building to be complete ensures that the Licensing Authority can, if necessary, inspect it fully, as can other responsible authorities, with inspection rights under the Act.

[5-175.15](#) In deciding whether a premises licence can be granted where there are construction works, at existing premises, the Council will determine applications on their merits, applying a two-stage consideration process:

- First, whether the premises ought to be permitted to be used for gambling.
- Second, whether appropriate conditions can be put in place to cater for that situation.

[5-185.16](#) Applicants should note that the Council is entitled to decide that it is appropriate to grant a licence subject to conditions, but it is not obliged to grant such a licence.

Location

[5-195.17](#) The Gambling Commission Guidance stipulates that demand issues cannot be considered in relation to the location of premises but that considerations made in terms of the licensing objectives can.

[5-205.18](#) In accordance with the Gambling Commission's Guidance for Local Authorities, this Licensing Authority will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder.

[5-245.19](#) This authority has not adopted any specific policy in relation to areas where gambling premises should not be located. Should any such policy be decided upon, this policy statement will be updated accordingly. It should be noted that any such future policy will not preclude any application being made with the onus upon the applicant showing how any potential concerns can be overcome.

[5-225.20](#) Each case will be decided on its merits and will depend, to a large extent, on the type of gambling that it is proposed will be offered on the premises.

[5-235.21](#) If an applicant can demonstrate appropriate measures to overcome concerns, that will be taken into account by the Council.

Conditions

5.245.22 Any conditions attached to licences will be proportionate and will be:

- i) Relevant to the need to make the proposed building suitable as a gambling facility.
- ii) Directly related to the premises and the type of licence applied for;
- iii) Fairly and reasonably related to the scale and type of premises: and
- iv) Reasonable in all other respects.

5.28 Decisions upon individual conditions will be made on a case-by-case basis, although there will be a number of control measures this licensing authority will consider utilising should there be a perceived need, such as the use of door supervisors, supervision of adult gaming machines, appropriate signage for adult-only areas etc. There are specific comments made in this regard under each of the licence types below.

5.29 This policy acknowledges that there are conditions that the licensing authority cannot attach to premises licences:

- i) Any condition on the premises licence which makes it impossible to comply with an operating licence condition.
- ii) Conditions relating to gaming machine categories, numbers, or method of operation.
- iii) Conditions which provide that membership of a club or body be required (the Gambling Act 2005 specifically removes the membership requirement for casino and bingo clubs and this provision prevents it being reinstated).
- iv) Conditions in relation to stakes, fees, winning or prizes.

Door Supervisors

5.30 The Gambling Commission advises in its Guidance for local authorities that Licensing Authorities may consider whether there is a need for door supervisors in terms of the licensing objectives of protection of children and vulnerable persons from being harmed or exploited by gambling, and also in terms of preventing premises becoming a source of crime.

5.31 This policy recognises that door supervisors at bingo or casino premises cannot be licensed by the Security Industry Authority (SIA). This Licensing Authority does not have specific requirements for door supervisors working at bingo or casino premises. Each case will be determined on its individual merits.

5.32 It is noted that for premises other than casinos and bingo premises, operators and licensing authorities may decide that supervision of entrances or machines is appropriate for particular cases but it will need to be decided whether these need to be SIA licensed or not. It will not be automatically assumed that they need to be.

CASINO PREMISES

- 5.33 To date, the Licensing Authority has chosen not to pass a resolution under section 166 (5) of the Gambling Act to prohibit casinos in the Borough.
- 5.34 Should the Council choose to make such a resolution, this will be a resolution of full Council following considered debate and the reasons for making the resolution will be given.

BINGO PREMISES

- 5.35 Bingo is a class of equal chance gaming and is permitted in alcohol licensed premises and in clubs provided it remains below a certain threshold, otherwise it will be subject to a bingo operating licence which will have to be obtained from the Gambling Commission.
- 5.36 The holder of a Bingo Operating Licence will be able to provide any type of bingo game including cash and prize bingo. Where bingo is permitted in alcohol licensed and non-gambling premises, this must not become a predominant commercial activity; otherwise a bingo operating licence will be required.
- 5.37 Commercial bingo halls will require a bingo premises licence from the Council. Amusement arcades providing prize bingo will require a prize gaming permit from the Council.
- 5.38 In each of the above cases it is important that where children are allowed to enter premises licensed for bingo, in whatever form, they are not allowed to participate in any bingo game, other than on category D machines. When considering applications of this type the Council will therefore take into account, among other things, the location of the games or machines, access to those areas, general supervision of the premises and the display of appropriate notices.
- 5.39 The Licensing Authority recognises that there is no ban on children or young people having access to Bingo premises, that it is illegal for Under 18s to play or use Category B and C machines and that they cannot be employed in providing facilities for gambling or bingo premises. In any event, children under 16 cannot be employed in any capacity at a time when facilities for playing bingo are being offered. 16 and 17 year olds may be employed while bingo is taking place provided the activities on which they are employed are not connected with the gaming or gaming machines. Where children aged 16 and 17 are employed in bingo premises, the Licensing Authority would expect to see sufficient controls restricting access to Category B and C machines.

~~5.40~~—A limited number of gaming machines may also be made available at Bingo licensed premises. A list of categories of gaming machines is on page ~~32~~. ~~Where~~43

category C or above machines are available in premises to which children are admitted, the licensing authority will seek to ensure that:

- i) All such machines are located in an area of the premises separated from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance.
- ii) Only adults are admitted to the area where these machines are located.
- iii) Access to the area where the machines are located is supervised.
- iv) The area where the machines are located is arranged so that it can be observed by staff of the operator or the licence holder and
- v) At the entrance to, and inside any such area there are prominently displayed notices indicating that access to the area is prohibited to persons under the age of 18.

5.40 The Council will expect applicants to offer their own measures to meet licensing objectives however appropriate measures / licensing conditions may cover issues such as:

- Proof of age schemes.
- CCTV – this should be of sufficient quality that it will use evidence.
- the provision of entrances/machine areas
- physical separation areas
- location of entry
- notices/signage
- specific opening hours
- [self-exclusion](#) schemes - these are schemes whereby individuals who acknowledge they have a gambling problem ask [to be](#) barred from certain premises
- provision of information leaflets/helpline numbers for organisations such as GamCare

This list is not mandatory, nor exhaustive, and is merely indicative of example measures that the Council can consider implementing.

5.41 With regard to segregation of Category B and C machines from Category D machines, there is a requirement that there must be clear segregation between these types of machine so that children do not have access to Category B or C machines and the Licensing Authority will take into account any guidance issued by the Gambling Commission in the light of any regulations made by the Secretary of State.

Members' Clubs and Commercial Clubs

5.42 Bingo may be provided at clubs and institutes either in accordance with a permit or providing that the limits in section 275 of the Act are complied with. These restrictions limit the aggregate stake or prizes within any seven days to £2000, and require the Commission to be notified as soon as is reasonably practicable if

that limit is breached. Stakes or prizes above that limit will require a Bingo Operators Licence and the corresponding Personal and Premises licences.

- 5.43 With regard to turnover, where the Licensing Authority is suspicious that a licensee or club exceeds the turnover in the required 7-day period, the Licensing Authority will inform the Gambling Commission accordingly.
- 5.44 The Licensing Authority will take into account any additional guidance issued by the Gambling Commission in relation to the suitability and layout of bingo premises.

BETTING PREMISES

- 5.45 The Licensing Authority is responsible for issuing and monitoring Premises Licences for all betting premises. Anyone wishing to operate a betting office will require a Betting Premises Licence from the Council.
- 5.46 Children and young people will not be able to enter premises with a betting premises licence.
- 5.47 Betting premises will be able to provide a limited number of gaming machines and some betting machines. A table showing the number and category of gaming machines permitted in betting premises is on page ~~33.44~~
- 5.48 In premises licensed for alcohol consumption, the Council has the power to restrict the number of gaming machines, their nature and the circumstances in which they are made available. It will not generally exercise this power though unless there are good reasons to do so taking into account, among other things: the size of the premises, the level of management, supervision and ability of staff to monitor the use of machines especially where children and young or vulnerable people are concerned; and the number of counter positions available for person-to-person transactions.
- 5.49 The Council will expect applicants to offer their own measures to meet licensing objectives however appropriate measures / licensing conditions may cover issues such as:
- Proof of age schemes.
 - CCTV – this should be of sufficient quality that it will use evidence.
 - the provision of entrances/machine areas
 - physical separation areas
 - location of entry
 - notices/signage
 - specific opening hours
 - ~~self-exclusion~~ self-exclusion schemes - these are schemes whereby individuals who acknowledge they have a gambling problem ask ~~to be~~ barred from certain premises

- provision of information leaflets/helpline numbers for organisations such as GamCare

This list is not mandatory, nor exhaustive, and is merely indicative of example measures that the Council can consider implementing.

TRACKS

- 5.49 Only one Premises Licence can be issued for any particular premises at any time unless the premises is a 'track'. A track is a site where races or other sporting events take place.
- 5.50 Track operators are not required to hold an 'Operators Licence' granted by the Gambling Commission. Therefore, premises licences for tracks, issued by the Council are likely to contain requirements for premises licence holders about their responsibilities in relation to the proper conduct of betting. Track operators will have an important role to play, for example in ensuring that betting areas are properly administered and supervised.
- 5.51 Although there will primarily be a betting premises licence for the track, there may be a number of subsidiary licences authorising other gambling activities to take place. Unlike betting offices, a betting premises licence in respect of a track does not give an automatic entitlement to use gaming machines.
- 5.52 Licensing authorities have a power under the Gambling Act 2005 to restrict the number of betting machines, their nature and the circumstances in which they are made available, by attaching a licence condition to a betting premises licence. When considering whether to exercise its power to restrict the number of betting machines at a track the Council will consider the circumstances of each individual application and, among other things will consider the potential space for the number of machines requested, the ability of track staff to supervise the machines, especially if they are scattered around the site, and the ability of the track operator to prevent children and young persons and vulnerable people betting on the machines.
- 5.53 This Licensing Authority is aware that the Gambling Commission may provide further specific guidance as regards tracks. We have taken note of the Guidance from the Gambling Commission which highlights that tracks are different from other premises in that there may be more than one premises licence in effect and that the track operator may not be required to hold an operator licence as there may be several premises licence holders at the track which will need to hold their own operator licences.
- 5.54 There may be some specific considerations with regard to the protection of children and vulnerable persons from being harmed or exploited by gambling and

this authority would expect the premises licence applicants to demonstrate suitable measures to ensure that children do not have access to adult only gaming facilities. It is noted that children and young person's will be permitted to enter track areas where facilities for betting are provided on days when dog- racing and/or horse racing takes place, although they are still prevented from entering areas where gaming machines (other than category D machines) are provided.

5.55 Measures such as the use of self-barring schemes, provision of information leaflets and helpline numbers for organisations such as GamCare will be considered suitable in relation to the protection of children and vulnerable people.

5.56 Where appropriate, in order for the Licensing Authority to gain a proper understanding of what it is being asked to licence, applicants will be asked to:

- i) Provide a detailed plan of the grounds indicating where the betting is to take place and the location of the race track;
- ii) In the case of dog tracks and horse racecourses, indicate the location of any fixed and mobile pool betting facilities operated by the Tote or track operator as well as any other proposed gambling facilities;
- iii) Evidence measures taken to ensure the third Licensing Objective will be complied with;
- iv) Indicate what arrangements are being proposed for the administration of the betting; the Gambling Commission and Licensing Authority recommend that betting takes place in areas reserved for, and identified as being for that purpose.
- v) Define the areas of the track that will be used by on course operators visiting the track on race days.
- vi) Define any temporary structures erected on the track for providing facilities for betting.
- vii) Define the location of any gaming machines (if any).

5.57 Plans should make clear what is being sought for authorisation under the track betting premises licence and what, if any, other areas are to be subject to a separate application for a different type of premises licence.

Betting Machines at Tracks

5.58 In addition to the comments above at betting machines in betting premises, similar considerations apply in relation to tracks, where the potential space for such machines may be considerable, bringing with it significant problems in relation to the proliferation of such machines, the ability of track staff to supervise them if they are scattered around the track and the ability of the track operator to comply with the law and prevent children betting on the machine. The licensing authority may consider restricting the number and location of betting machines, in the light of the circumstances of each application for a track betting premises licence.

- 5.59 This licensing authority notes the Commission's view, that it would be preferable for all self-contained premises operated by off-course betting operators on tracks to be the subject of separate premises licences. This would ensure that there was clarity between the respective responsibilities of the track operator and the off-course betting operator running a self-contained unit on the premises.

Condition on rules being displayed

- 5.60 In line with guidance from the Gambling Commission the Council will attach a condition to track premises licences requiring the track operator to ensure that the rules are prominently displayed in or near the betting areas, or that other measures are taken to ensure that they are made available to the public. For example, the rules could be printed in the race-card or made available in leaflet form from the track office.

ADULT GAMING CENTRES

- 5.61 As no one under the age of 18 is permitted to enter an Adult Gaming Centre, this Licensing Authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the Licensing Authority that there will be sufficient measures to ensure that under 18 year olds do not have access to the premises. Applicants are recommended to consider this Licensing Objective very carefully when applying for an Adult Gaming Centre.
- 5.62 The Council will expect applicants to offer their own measures to meet licensing objectives however appropriate measures / licensing conditions may cover issues such as:
- Proof of age schemes.
 - CCTV – this should be of sufficient quality that it will use evidence.
 - the provision of entrances/machine areas
 - physical separation areas
 - location of entry
 - notices/signage
 - specific opening hours
 - ~~self-exclusion~~ self-exclusion schemes - these are schemes whereby individuals who acknowledge they have a gambling problem ask ~~to be~~ barred from certain premises
 - provision of information leaflets/helpline numbers for organisations such as GamCare

This list is not mandatory, nor exhaustive, and is merely indicative of example measures that the Council can consider implementing.

5.63 Where the Adult Gaming Centre is situated in a complex such as an airport, shopping area or motorway service station, the Licensing Authority will pay particular attention to the location of entry so as to minimise opportunities for children gaining access.

5.64 A table showing the number and category of gaming machines permitted in adult gaming centres is on page ~~33-44~~

FAMILY ENTERTAINMENT CENTRES (FECs)

5.65 There are two classes of family entertainment Centres. Licensed FECs provide Category C and D machines and require a Premises Licence. Unlicensed FECs provide Category D machines only and are regulated through FEC Gaming Machine Permits.

(Licensed) Family Entertainment Centres

5.66 Children and young persons may enter FECs but are not permitted to play Category C machines. This licensing authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to ensure that there will be sufficient measures to prevent under 18 year olds having access to the adult only gaming machine areas.

5.67 With regard to vulnerable persons, the Licensing Authority will consider measures such as the use of ~~self-barring~~ [self-barring](#) schemes, provision of information leaflets/help line numbers for organizations such as GamCare as appropriate measures.

5.68 With regard to segregation of Category C machines in licensed FECs, there is a requirement that there must be clear segregation between the two types of machine so that children do not have access to Category C machines and the Licensing Authority will take into account any guidance issued by the Gambling Commission in the light of any regulations made by the Secretary of State.

5.69 Applicants are recommended to visit the Gambling Commission's website in order to familiarise themselves with the conditions applicable to these premises.

Statement of Principles

5.70 As these premises are open to children and young persons, the Licensing Authority will wish to see additional information, such as:

- i) A plan of the premises showing clear segregation of Category C and D machines.
- ii) Clear Notices excluding under 18 year olds from the designated areas where Category C machines are located;
- iii) Age Restriction Policy;

- iv) Evidence of ongoing staff training in administering all aspects of age restriction policy;
- v) Solid physical barriers separating adult gaming area from the main floor, i.e. the barriers to be a min. of 1 metre in height from the floor;
- vi) Completion of a training programme in social awareness in respect of gambling
- vii) Evidence of compliance with BACTA's Code of Practice

TRAVELLING FAIRS

- 5.71 Travelling fairs do not require any permit to provide gaming machines but must comply with the legal requirements on the way the machine operates. They may provide an unlimited number of Category D gaming machines and it will fall to the licensing authority to decide whether, where category D machines and/or equal chance prize gaming without a permit is to be made available for use at travelling fairs, the statutory requirement that the facilities for gambling amount to no more than an ancillary amusement at the fair is met.
- 5.72 The Licensing Authority will consider whether or not a travelling fair falls within the statutory definition of a travelling fair and recognises that the 27 day statutory maximum for the land being used as a fair, is per calendar year, and that it applies to the piece of land on which the fairs are held, regardless of whether it is the same or different travelling fairs occupying the land. The Licensing Authority will work with neighbouring authorities to ensure that land that crosses joint boundaries is monitored so that the statutory limits are not exceeded.

REVIEW OF PREMISES LICENCES

- 5.73 A premises licence may be reviewed by the Licensing Authority of its own volition or following receipt of an application for a review, which is essentially a request by a third party to the Licensing Authority to review a particular licence.
- 5.74 However, it is for the Licensing Authority to decide whether or not the review is to be carried out. This will be on the basis of whether the request for the review is relevant to the matters listed below as well as consideration as to whether the request is frivolous, vexatious, will certainly not cause the Authority to wish to alter/revoke/suspend the licence or whether it is substantially the same as previous requests for review.
- 5.75 The review will be:
- i) In accordance with any relevant Code of Practice issued by the Gambling Commission.
 - ii) In accordance with any relevant Guidance issued by the Gambling Commission.

- iii) Reasonably consistent with the Licensing Objectives and
- iv) In accordance with the Licensing Policy Statement.

5.76 Licensing Authority officers may be involved in the initial investigations of complaints leading to a review, or may try informal mediation or dispute resolution before a full review is conducted. An application for review must be granted, unless it decides to reject the application in accordance with the act.

5.77 The Licensing Authority can also initiate a review of a licence on the basis of any reason that it thinks is appropriate with regard to the licensing objectives. This can extend to a review of a class of licences where it considers particular issues have arisen.

PART 6 GAMING PERMITS

INTRODUCTION TO PERMITS

- 6.1 Permits are required when premises provide a gambling facility but either the stakes and prizes are very low or gambling is not the main function of the premises. The permits regulate gambling and the use of gaming machines in a specific premises.
- 6.2 The Licensing Authority is responsible for issuing the following permits:
- Family Entertainment Centre (FEC) Gaming Permits
 - Club Gaming Permits and Club Machine Permits
 - Alcohol –licensed Premises Gaming Machine Permits
 - Prize Gaming permits
- 6.3 The Licensing Authority may only grant or reject an application for a permit and cannot impose or attach any conditions.
- 6.4 There are different considerations to be taken into account when considering the different types of permit applications. Please refer to the relevant parts of this below.

GAMING MACHINES

- 6.5 A gaming machine can cover all types of gambling activity, which can take place on a machine, including betting on virtual events. A machine is not a gaming machine if the winning of a prize is determined purely by the player's skill. However, any element of chance imparted by the action of the machine would cause it to be a gaming machine.
- 6.6 Where the Licensing Authority is uncertain of whether or not a machine is a gaming machine as defined under the Act, it will seek the advice of the Gambling Commission.
- 6.7 There are four classes of gaming machines: Categories A, B, C and D, with category B further divided into sub-categories B1, B2, B3, B3A and B4. The table below sets out the current maximum stakes and prizes that apply to each category:

CATEGORIES OF GAMING MACHINES

CATEGORY	MAXIMUM STAKE	MAXIMUM PRIZE
A	Unlimited	Unlimited
B1	£5	£10,000*
B2	£100 (in multiples of £10) £2 effective April 2019	£500
B3	£2	£500
B3A	£2	£500
B4	£2	£400
C	£1	£100
D**	-	-
D non-money prize (other than crane grab machine)	30p	£8
D non-money prize (crane grab machine)	£1	£50
D money prize (other than a coin pusher or penny falls machine)	10p	£5
D combined money and non-money prize (other than coin pusher or penny falls machines)	10p	£8 (of which no more than £5 may be a money prize)
D combined money and non-money prize (coin pusher or penny falls machine)	20p	£20 (of which no more than £10 may be a money prize)

* Category B1 where the prize value available through its use is wholly or partly determined by reference to use made of one or more other subcategory B1 machines, no more than £20,000

**Category D machines with a 10p stake are entitled to offer prizes of up to £5 in cash, or up to £5 in cash and £3 in non-monetary prizes. Category D machines with a 30p stake can offer £8 in non-monetary prizes only.

- 6.8 The Gambling Act also prescribes the maximum number and category of gaming machines that are permitted in each type of gambling premises. This includes premises with permit entitlements, as well as licensed premises (see table on page 35):

NUMBER OF GAMING MACHINES BY PREMISES TYPE

TYPE	GAMING MACHINES
BINGO PREMISES	<p>MAXIMUM OF 20% OF THE TOTAL NUMBER OF GAMING MACHINES WHICH ARE AVAILABLE FOR USE ON THE PREMISES FOR CATEGORIES B3 AND B4.</p> <p>NO LIMIT ON CATEGORY C AND CATEGORY D MACHINES</p>
BETTING PREMISES	<p>MAXIMUM OF 4 GAMING MACHINES CATEGORIES B2 TO D (EXCEPT B3A MACHINES)</p>
TRACK BETTING PREMISES WHERE POOL BETTING LICENCE HELD	<p>MAXIMUM OF 4 GAMING MACHINES CATEGORIES B2 TO D (EXCEPT B3A MACHINES)</p>
ADULT GAMING CENTRE	<p>MAXIMUM OF 20% OF THE TOTAL NUMBER OF GAMING MACHINES WHICH ARE AVAILABLE FOR USE ON THE PREMISES FOR CATEGORIES B3 AND B4.</p> <p>NO LIMIT ON CATEGORY C AND CATEGORY D MACHINES</p>
FAMILY ENTERTAINMENT CENTRE WITH PREMISES LICENCE	<p>NO LIMIT ON CATEGORY C AND CATEGORY D MACHINES</p>
FAMILY ENTERTAINMENT CENTRE WITH GAMING PERMIT	<p>NO LIMIT ON CATEGORY D MACHINES</p>
MEMBERS CLUB PREMISES	<p>MAXIMUM OF 3 GAMING MACHINES IN CATEGORIES B3A OR B4 TO D (ONLY ONE B3A MACHINE CAN BE SITED AS PART OF THIS ENTITLEMENT)</p>
COMMERCIAL CLUBS	<p>MAXIMUM OF THREE GAMING MACHINES IN CATEGORIES B4 TO D</p>
ON SALES ALCOHOL LICENSED PREMISES	<p>MAXIMUM OF 2 GAMING MACHINES IN CATEGORIES C TO D BY NOTIFICATION NUMBER OF</p>
ON SALES ALCOHOL LICENSED PREMISES WITH GAMING MACHINE PERMIT	<p>CATEGORY C TO D MACHINES AS SPECIFIED ON PERMIT</p>

(UNLICENSED) FEC GAMING MACHINE PERMITS

- 6.9 Where Premises do not hold a Premises Licence but wishes to provide gaming machines, it may apply to the licensing authority for this permit. It should be

noted that under section 238 the applicant must show that the premises will be wholly or mainly used for making gaming machines available for use.

- 6.10 The Act states that a licensing authority may prepare a statement of principles that they propose to consider in determining the suitability of an applicant for a permit. In preparing that statement, and/or considering applications, it need not (but may) have regard to the licensing objectives and shall have regard to any relevant guidance issued by the Commission under section 25.
- 6.11 A FEC gaming machine permit may be granted only satisfied that the premises will be used as an unlicensed FEC, and if the Chief Officer of Police has been consulted on the application. The Licensing Authority may grant or refuse a permit but cannot impose conditions upon the grant of a permit. Therefore the licensing authority will wish to be satisfied as to the applicant's suitability before granting a permit. Unlicensed FECs, by definition, will not be subject to scrutiny by the Gambling Commission as no operating (or other) licences will be applied for and issued.

Statement of Principles

- 6.12 Applicants will be expected to show that there are policies and procedures in place to protect children from harm. Harm in this context is not limited to harm from gambling but includes wider child protection considerations. The efficiency of such policies and procedures will each be considered on their merits. However, they may include background checks on staff, training for staff in dealing with unsupervised very young children being on the premises, or children causing perceived problems on or around the premises.
- 6.13 Applicants will be expected to demonstrate:
 - i) A full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed FECs.
 - ii) That the applicant has no relevant convictions (those that are set out in Schedule 7 of the Act).
 - iii) That staff are trained to have a full understanding of the maximum stakes and prizes; and
 - iv) An awareness of local school holiday times and how to identify the local education office should truants be identified.
- 6.14 Compliance with the Code of Practice in relation to FECs, issued by BACTA, will be taken by the Licensing Authority as evidence that (apart from the criteria relating to criminal convictions) the applicant has met the above.
- 6.15 As these premises are open to children and young persons, the Licensing Authority will require additional information when an applicant applies for this Permit, as follows:

- (i) A plan of the premises to a scale of 1:100. If a 1:100 scaled plan cannot be submitted the plans must be clear and legible in all material respects. All plans must show the exits/entrances to the premises, location of gaming machines, and the location of safety equipment such as fire extinguishers and indicating the location of appropriate clear and prominent notices and barriers, such Notices to state:
 - (a) That no unaccompanied child will be permitted to remain on the premises if that person is required by law to attend school;
 - (b) Highlighting the need to play responsibly;
 - (c) The number and location of Category D machines;
 - (ii) Evidence of staff training by way of a Premises Log Book, covering how staff would deal with unsupervised very young children being on the premises, or children causing perceived problems on/around the premises;
 - (iii) The amount of space around gaming machines to prevent jostling of players or intimidation;
 - (iv) Location and supervision of Automated Teller Machines;
 - (v) Proof of Age scheme;
 - (vi) Evidence that the applicant has complied with Health and Safety and Fire Safety legislation;
 - (vii) Details of opening hours;
 - (viii) Details of external appearance of premises;
 - (ix) Numbers of staff employed;
 - (x) Insurance documents and any other such information the Licensing Authority will from time to time require;
 - (xi) Any other policies or procedures in place to protect children from harm.
- 6.16 The above statement of principles will apply in relation to initial applications only and not renewals.
- 6.17 With regard to renewals, the Licensing Authority may refuse an application for renewal of a permit only on the grounds that an authorised local authority officer has been refused access to the premises without reasonable excuse, or that renewal would not be reasonably consistent with pursuit of the licensing objectives.
- 6.18 Where an applicant fails to comply with the above requirements, the Licensing Authority may refuse the application. Where there is such a refusal, the Licensing Authority will notify the applicant of its intention to refuse and the reasons for the refusal. The applicant will then have an opportunity to make representations orally, in writing or both and will have a right of appeal against any decision made.

- 6.19 Where the Permit has been granted the Licensing Authority will issue the permit as soon as is reasonably practicable and in any event in line with the Regulations issued by the Secretary of State. The permit will then remain in effect for 10 years unless surrendered or lapsed.
- 6.20 As these premises particularly appeal to children and young persons, the Licensing Authority will give weight to child protection issues and will also consider an applicant's suitability for FEC permits and factors taken into account will include the Applicant's criminal record and previous history and experience of running similar premises, if any.

CLUB GAMING AND CLUB MACHINES PERMITS

- 6.21 Members Clubs and Miners' Welfare Institutes (not Commercial Clubs) may apply for a Club Gaming Permit or Club Gaming Machine Permit.
- 6.22 **Club Gaming Permit**
Club gaming permits allow the premises to provide:
- i) Up to three machines of categories B, C or D.
 - ii) Equal chance gaming; and
 - iii) Games of chance as set out in regulations.
- 6.23 **Club Gaming Machine Permit**
A club gaming machine permit will enable the premises to provide up to three machines of categories B, C or D.
- 6.24 Before granting a permit, the Licensing Authority will wish to be satisfied that applicants for these permits meet the statutory criteria for members' clubs contained in sections 266 and 267 of the Gambling Act and may grant the permit provided the majority of members are over 18 years of age.
- 6.25 The Licensing Authority recognises that there is a 'fast track' procedure for premises holding a Club Premises Certificate under the Licensing Act 2003 and that there is no opportunity for objections to be made by the Commission or the Police and the grounds upon which the Licensing Authority can refuse a permit are reduced.

ALCOHOL LICENSED PREMISES GAMING MACHINE PERMITS

- 6.26 There is provision in the Act for premises licensed to sell alcohol for consumption on the premises, to automatically have two gaming machines, of categories C and/or D. The premises licence holders merely need to notify the Licensing Authority that they intend to exercise their automatic entitlement to gaming machines in their premises.

- 6.27 Under section 284 the Licensing Authority can remove the automatic authorisation in respect of any particular premises if:
- i) Provision of the machines is not reasonably consistent with the pursuit of the licensing objectives.
 - ii) Gaming has taken place on the premises that breaches a condition of section 282 of the Gambling Act (i.e. that written notice has been provided to the Licensing Authority, that a fee has been provided and that any relevant code of practice issued by the Gambling Commission about the location and operation of the machine has been complied with).
 - iii) The premises are mainly used for gaming; or
 - iv) An offence under the Gambling Act has been committed on the premises.
- 6.28 Should it necessary to issue section 284 order, the licence-holder will be given at least twenty-one days' notice of the intention to make the order, and consider any representations which might be made. The authority will hold a hearing if the licensee requests it.
- 6.29 If a premises wishes to have more than 2 machines, then it needs to apply for a permit and the licensing authority must consider that application based upon the licensing objectives, any guidance issued by the Gambling Commission issued under Section 25 of the Gambling Act 2005, and "such matters as they think relevant."

Statement of Principles

- 6.30 This Licensing Authority considers that such matters will be decided on a case by case basis but generally there will be regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to ensure that under-18 year olds do not have access to the adult-only gaming machines.
- 6.31 Measures which will satisfy the authority that there will be no access may include the adult machines being in sight of the bar, or in the sight of staff that will monitor that the machines are not being used by those under 18. Notices and signage may also be helpful. As regards the protection of vulnerable persons applicants may wish to consider the provision of information leaflets/helpline numbers for organisations such as GamCare.
- 6.32 The Licensing Authority will usually expect holders of gaming machine permits to ensure that the gaming machines are sited in accordance with any relevant code of practice issued by the Gambling Commission and to ensure that they can be adequately supervised whilst in use.

- 6.33 It is recognised that some alcohol-licensed premises may apply for a premises licence for their non-alcohol licensed areas. Any such application would need to be applied for, and dealt with as an adult entertainment centre premises licence.
- 6.34 It should be noted that the Licensing Authority is empowered to grant the application with a smaller number of machines and/or a different category of machines than that applied for. Conditions (other than those restricting the number or category of machines) cannot be attached.
- 6.35 It should also be noted that the holder of a permit must comply with any Code of Practice issued by the Gambling Commission about the location and operation of the machine.

PRIZE GAMING PERMITS

- 6.37 The licensing authority may prepare a statement of principles which they propose to apply in exercising their functions which may, in particular, specify matters that the licensing authority proposes to consider in determining the suitability of the applicant for a permit.
- 6.38 Prize gaming may be provided in bingo premises as a consequence of their bingo operating licence. Any type of prize gaming may be provided in adult gaming centres and licensed family entertainment centres. Unlicensed family entertainment centres may offer equal chance prize gaming under a gaming machine permit. Prize gaming without a permit may be provided by travelling fairs providing none of the gambling facilities at the fair amount to more than an ancillary amusement. Children and young people may participate in equal chance gaming only.
- 6.39 In making its decision on an application for this permit the Licensing Authority does not need to have regard to the licensing objectives but must have regard to any Gambling Commission guidance.
- 6.40 Applicant should set out the types of gaming they are intending to offer and should be able to demonstrate:
- i) That they understand the limits to stakes and prizes that are set out in Regulations; and
 - ii) That the gaming offered is within the law.
- 6.41 It should be noted that there are conditions in the Gambling Act 2005 by which the permit holder must comply, but that the Licensing authority cannot attach conditions. The conditions in the Act are:
- i) The limits on participation fees, as set out in regulations, must be complied with.

- ii) All chances to participate in the gaming must be allocated on the premises on which the gaming is taking place and on one day; the game must be played and completed on the day the chances are allocated; and the result of the game must be made public in the premises on the day that it is played.
- iii) The prize for which the game is played must not exceed the amount set out in regulations (if a money prize), or the prescribed value (if non-monetary prize); and
- iv) Participation in the gaming must not entitle the player to take part in any other gambling.

6.42 Applications may only be made by people who occupy or plan to occupy the premises, are aged 18 or over (if an individual), and no premises licence or club gaming permit under the Gambling Act 2005 may be in force.

Statement of Principles

6.43 This licensing authority considers that such matters will be decided on a case by case basis but generally there will be regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to ensure that under-18 year olds do not have access to unequal chances prize gaming.

6.44 A plan must accompany applications indicating where, and what type, of prize gaming is to be provided.

6.45 The grounds for decision making as regards renewals are the same as for initial applications.

6.46 Where the Licensing Authority intends to refuse the application for a permit, it will notify the applicant of its intention to refuse it stating the reasons and offering the applicant an opportunity to make representations orally or in writing or both.

PART 7
TEMPORARY AND OCCASIONAL USE NOTICES

TEMPORARY USE NOTICES (TUN)

- 7.1 A Temporary Use Notice ("TUN") is a notice which authorises a person or an organisation to conduct gaming activities for a temporary period of time, at a particular premises. However, a TUN may only be granted if the premises user is already in possession of a relevant Operating Licence. The London Borough of Hillingdon is bound by a number of statutory limits as regards TUNs. Section 218 of the Act refers to a 'set of premises' and provides that a set of premises is the subject of a temporary use notice if 'any part' of the premises is the subject of a TUN.
- 7.2 The reference to a 'set of premises' prevents one large premise from having a temporary use notice in effect for more than 21 days in a year by giving notification in relation to different parts of the premises and re-setting the clock.
- 7.3 The Licensing Authority will decide what constitutes a 'set of premises' where Temporary Use Notices are received relating to the same building/site.
- 7.4 In considering whether a place falls within the definition of a 'set of premises' the Licensing Authority will look at the ownership/occupation and control of the premises and the Licensing Authority will consider whether different units are in fact different 'sets of premises'. An example would be a large exhibition centre with different exhibition halls. This would be considered properly as one premise and would not be granted a temporary use notice for each of its exhibition halls.
- 7.5 A TUN must be lodged with the Licensing Authority not less than three (3) months and one (1) day before the day on which the gambling event will begin. The person who is giving the TUN must ensure that the notice and copies are with the Licensing Authority and named responsible authorities within seven (7) days of the date of the notice.
- 7.6 On receipt of a TUN the Licensing Authority will send a written acknowledgement as soon as is reasonably practicable and this may be by way of email.
- 7.7 If no objections are made within 14 days of the date of the temporary use notice, the Licensing Authority will grant and return the notice with an endorsement of validity.
- 7.8 If objections are received within 14 days of the date of notice, a hearing will be held to consider the issue of a TUN. Those who raise objections may offer modifications to the notice that will resolve their objections. If all participants to a hearing agree that a hearing is unnecessary, the hearing may be dispensed with.

- 7.9 The Licensing Authority may object to notices where it appears that their effect would be to permit regular gambling in a place that could be described as one set of premises. The Licensing Authority and other bodies to which the notice is copied may give notice of objection but they must have regard to the Licensing Objectives and where there are such objections, they must give a notice of objection to the person who gave the TUN, such notice will be copied to the Licensing Authority.

OCCASIONAL USE NOTICES (OUN)

- 7.10 An Occasional Use Notice may be used where there is betting on a track on 8 days or less in a calendar year. The OUN dispenses with the need for a Betting Premises Licence for a track and the Licensing Authority will maintain a register of all applications.
- 7.11 The licensing authority has very little discretion as regards these notices aside from ensuring that the statutory limit of 8 days in a calendar year is not exceeded. The licensing authority will need to consider the definition of a 'track' and whether the applicant is permitted to avail him/herself of the notice.
- 7.12 Tracks are normally thought of as permanent race courses, but the meaning of track not only covers horse racecourses or dog tracks, but also any other premises on any part of which a race or other sporting event takes place or is intended to take place. Although the track need not be a permanent fixture, land used temporarily as a track providing races or sporting events may qualify.

**PART 8
REGISTRATION OF SMALL SOCIETY LOTTERIES**

DEFINITION OF SMALL SOCIETY LOTTERY

- 8.1 The Gambling Act repeals the Lotteries and Amusements Act 1976. The Licensing Authority will register and administer smaller non-commercial lotteries. Promoting or facilitating a lottery will fall within 2 categories:
- i) Licensed Lotteries (requiring an Operating Licence from the Gambling Commission); and
 - ii) Exempt Lotteries (registered by the Licensing Authority).
- 8.2 Exempt Lotteries are lotteries permitted to run without a licence from the Gambling Commission and these are:
- i) Small Society Lotteries;
 - ii) Incidental Non-Commercial Lotteries;
 - iii) Private Lotteries;
 - iv) Private Society Lottery;
 - v) Work Lottery;
 - vi) Residents' Lottery;
 - vii) Customer Lotteries.
- 8.3 Societies may organise lotteries if they are licensed by the Gambling Commission or fall within the exempt category, and therefore registered by the Licensing Authority, because their proceeds are below specified levels. The Licensing Authority recommends those seeking to run lotteries take their own legal advice on which type of lottery category they fall within. However, guidance notes with regard to all lotteries, limits placed on small society lotteries and information setting out financial limits will be made available on the Council's website or by contacting the Licensing Authority.

THE LICENSING AND REGISTRATION SCHEME

- 8.4 Applicants for lottery licences must apply to the Licensing Authority in the area where their principal office is located. Where the Licensing Authority believes that the Society's principal office is situated in another area it will inform the Society as soon as possible and where possible, will inform the other Licensing Authority.
- 8.5 Lotteries will be regulated through a licensing and registration scheme, conditions imposed on licences by the Gambling Commission, Codes of Practice and any Guidance issued by the Gambling Commission. In exercising its functions with regard to small society and exempt lotteries, the Licensing Authority will have due regard to the Gambling Commission's Guidance.

- 8.6 The Licensing Authority will keep a Public Register of all applications and will provide information to the Gambling Commission on all lotteries registered by the Licensing Authority. As soon as the entry on the Register is completed, the Licensing Authority will notify the applicant of his registration. In addition, the Licensing Authority will make available for inspection by the public; the financial statements/returns submitted by societies in the preceding 18 months and will monitor the cumulative totals for each society to ensure the annual monetary limit is not breached. If there is any doubt, the Licensing Authority will notify the Gambling Commission in writing, copying this to the Society concerned.
- 8.7 The Licensing Authority will refuse applications for registration if in the previous five years, either an Operating Licence held by the applicant for registration has been revoked, or an application for an Operating Licence made by the applicant for registration has been refused. Where the Licensing Authority is uncertain as to whether or not an application has been refused, it will contact the Gambling Commission to seek advice.
- 8.8 The Licensing Authority may refuse an application for registration if in their opinion:
- i) The applicant is not a non-commercial society;
 - ii) A person who will or may be connected with the promotion of the lottery has been convicted of a relevant offence; or
 - iii) Information provided in or with the application for registration is false or misleading.
- 8.9 The Licensing Authority will ask applicants to set out the purposes for which the Society is established and will ask the Society to declare that they represent a bona fide non-commercial society and have no relevant convictions. The Licensing Authority may, however, seek further information from the Society.
- 8.10 Where the Licensing Authority intends to refuse registration of a Society, it will give the Society an opportunity to make representations and will inform the Society of the reasons why it is minded to refuse registration and supply evidence on which it has reached that preliminary conclusion. In any event, the Licensing Authority will make available on its website its procedures on how it handles representations.
- 8.11 The Licensing Authority may revoke the registered status of a society if it thinks that they would have had to, or would be entitled to; refuse an application for registration if it were being made at that time. However, no revocations will take place unless the Society has been given the opportunity to make representations. The Licensing Authority will inform the society of the reasons why it is minded to revoke the registration and will provide an outline of the evidence on which it has reached that preliminary conclusion.

- 8.12 Where a Society employs an external lottery manager, they will need to satisfy themselves that they hold an Operator's Licence issued by the Gambling Commission and the Licensing Authority will expect this to be verified by the Society.
- 8.13 The Licensing Authority will expect registered small society lottery societies to renew their registrations each year. It is not the responsibility of the Licensing Authority to issue reminders to small society lottery societies to advice of renewals. Registrations will expire if they are not renewed in a timely way. Cancellation of a small society lottery will be confirmed in writing by the Licensing Authority.

PART 9 DECISION MAKING

THE LICENSING COMMITTEE

- 9.1 The Licensing Committee will consist of at least 10 Members. Licensing Sub-committees consisting of 3 Committee Members will hear any relevant representations from Responsible Authorities and interested parties. Any of these individuals or groups may specifically request a representative to make representations on the applicant's behalf. This could be a legal representative, a friend, an MP or a Ward Councillor.
- 9.2 Where a Councillor who is a member of the Licensing Sub-Committee is making or has made representations regarding a licence on behalf of an interested party, in the interests of good governance they will disqualify themselves from any involvement in the decision-making process affecting the licence in question.
- 9.3 Licensing Authorities must have regard to the licensing objectives when exercising their functions in relation to premises licences, temporary use notices and some permits.
- 9.4 The decision determined by the Sub-Committee will be accompanied with clear, cogent reasons for that decision, having had due regard to being reasonably consistent with the Licensing Objectives; the Human Rights Act 1998; any relevant code of practice under Section 24 of the Gambling Act 2005; any relevant guidance issued by the Commission under Section 25 of the Gambling Act 2005; and this Statement of Policy. The decision and the reasons for that decision will be sent to the Applicant and those who have made relevant representations as soon as practicable.

DELEGATION OF DECISION MAKING RESPONSIBILITIES

- 9.5 The Council will be involved in a wide range of licensing decisions and functions and has established a Licensing Committee to administer them.
- 9.6 Appreciating the need to provide a speedy, efficient and cost-effective service to all parties involved in the licensing process, decisions on all licensing matters will be taken in accordance with an approved scheme of delegation, as attached at [Appendix D. Annex C.](#)
- 9.7 Many of the decisions and functions will be purely administrative in nature and the grant of non-contentious applications, including for example, those licences and permits where no representations have been made, will be delegated to Council Officers.

PART 10

APPENDIX ANNEX A

SCHEDULE OF CONSULTEES TO DRAFT POLICY

PERSONS OR BODIES REPRESENTING THE INTERESTS OF THOSE CARRYING ON GAMBLING BUSINESSES IN THE BOROUGH

Association of British Bookmakers
Association of Licensed Multiple
Retailers
British Amusement Catering
Association
British Beer and Pub Association
National Casino Industry Forum
British Holiday & Home Parks
Association
Greyhound Board of Great Britain
British Institute of Inn keeping
Business in Sport and Leisure Ltd
Casino Operators Association, UK
Community Trade Union
Federation of Licensed Victuallers
Gamcare
AGE UK
Hillingdon Chamber of Commerce
Remote Gambling Association
Responsibility in Gambling Trust
Rugby Football Union
The Bingo Association
The Football Association
The Lotteries Council
The Working Men's Club & Institute
Union

PERSONS OR BODIES REPRESENTING THE INTERESTS OF THOSE WHO ARE LIKELY TO BE AFFECTED BY THE EXERCISE

OF THE AUTHORITY'S FUNCTIONS

All Elected (Ward) Councillors,
London Borough of Hillingdon
Council
All "Responsible Authorities" as
defined under the Gambling Act (see
*Appendix C for list and contact
details*)
Alcoholics Anonymous (AA)
Gamblers Anonymous
Government Organisations: (LGA,
ODPM, LACORS)
Hillingdon Action Group for Addiction
Management (HAGAM)
Hillingdon Association of Voluntary
Services
Hillingdon's Children and Young
People's Partnership Board
(CYPSPB)
Hillingdon Community and Police
Consultative Group
Hillingdon Drug and Alcohol Services
Hillingdon Law Centre
Hillingdon Mind
Hillingdon NHS
Hillingdon Salvation Army
Hillingdon Samaritans
Hillingdon Youth Offending Service
Hillingdon Tenants and Residents
Associations
Hillingdon Federation of Community
Associations & similar bodies
Local Licensing Solicitors in
Hillingdon
Local Strategic Partnership Uxbridge
Initiative
Uxbridge Magistrates Court

NEIGHBOURING LONDON,
COUNTY AND DISTRICT
COUNCIL'S

London Boroughs of: Brent, Ealing,
Hammersmith & Fulham, Harrow
and Hounslow
(*West London Alliance Members*)

And:
Slough Borough Council
Spelthorne Borough Council
Hertfordshire County Council
South Bucks District Council
Three Rivers District Council

Note: This list was not intended to be exhaustive. Comments and observations were welcomed from anyone affected by this policy.

APPENDIX ANNEX B

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SCHEDULE OF RESPONSIBLE AUTHORITIES

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For the purposes of the Act, Responsible Authorities are public bodies that must be notified of all applications and who are entitled to make representation in relation to Premises

Hillingdon Licensing Authority ~~e/o~~
~~The Licensing Service Residents-~~
~~Services~~
London Borough of Hillingdon
Civic Centre, Uxbridge
UB8 1UW
licensing@hillington.gov.uk

~~Hillingdon Planning Authority~~
~~Head of Planning and Enforcement Residents-~~
~~Services~~
~~London Borough of Hillingdon Civic Centre,~~
~~Uxbridge~~
~~UB8 1UW~~

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Head of ~~Planning~~Development Planning
~~London Borough Of Hillingdon~~
~~Civic Centre~~
~~Uxbridge~~
~~UB8 1UW~~

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The Gambling Commission
~~4th Floor~~
~~Victoria Square House~~
~~Victoria Square~~
Birmingham
B2 4BP

Planning@hillington.gov.uk

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~~Police Licensing Chief Officer of~~
~~Police, London Borough of~~
~~Hillingdon~~
~~e/o Licensing Sergeant~~
Uxbridge Police Station 4
1 Warwick Place
Uxbridge
UB8 1PG
xh@met.pnn.police.uk

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~~London Fire Brigade and~~
~~Emergency Planning Authority-~~
~~169 Union Street~~
~~London Hillingdon Fire~~
~~SE1 0LL Safety Team~~
~~Hillingdon Fire Station~~
~~Uxbridge Road~~
~~Hillingdon UB10 0PH~~
Attn: North West Area Team

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[FSR-AdminSupport@london-](mailto:FSR-AdminSupport@london-fire.gov.uk)
[fire.gov.uk](mailto:FSR-AdminSupport@london-fire.gov.uk)

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~~London Borough of
Hillingdon Civic Centre,
Uxbridge
UB8 1UW~~

Children Board c/o Director of
Childrens Services London Borough
of Hillingdon Civic Centre, Uxbridge
UB8 1UW
safeguardingchildrenadmin@hillingsdon.gov.uk

Authority for Pollution &
Harm to Human Health
c/o Antisocial Behaviour
& Environment Team
London Borough of
Hillingdon Civic Centre,
Uxbridge
UB8 1UW

HM Revenue & Customs
Betting and Gambling Department Portcullis
House
21 India Street Glasgow
G2 4PZ

asbinvestigations@hillingsdon.gov.uk

~~Authorities for Vessels: Navigation-
Authority
The Enforcement Agency The
Canal and River Trust The
Secretary of State~~

Local Safeguarding

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Appendix ANNEX C

SUMMARY OF DELEGATION OF POWERS AS ALSO SET OUT IN THE COUNCIL'S
CONSTITUTION

FUNCTION	COUNCIL / CABINET	SUB- COMMITTEE	OFFICER
<u>Approval of the three year Statement of Gambling Policy</u>	<u>Cabinet and Full Council</u>	-	-
<u>Policy not to permit casinos</u>	<u>Full Council</u>	-	-
<u>Fee Setting - when appropriate</u>	<u>Cabinet</u>	-	
<u>Application for premises licences</u>	-	<u>If representation made</u>	<u>If no representation made</u>
<u>Application for a variation to a licence</u>	-	<u>If representation made</u>	<u>If no representation made</u>
<u>Application for a transfer of a licence</u>	-	<u>Where representations have been received from the Commission</u>	<u>Where no representations received from the Commission</u>
<u>Application for a provisional statement</u>	-	<u>If representation made</u>	<u>If no representation made</u>

<u>Review of a premises licence</u>	-	X	-
<u>Application for club gaming / club machine permits</u>	-	<u>If representation made</u>	<u>If no representation made</u>
<u>Cancellation of club gaming/ club machine permits</u>	-	X	-
<u>Applications for other permits</u>	-	-	X
<u>Cancellation of licensed premises gaming machine permits</u>	-	-	X
<u>Consideration of temporary use notice</u>	-	-	X
<u>Notifications and applications for two or three gaming machines</u>	-	-	X
	COUNCIL / CABINET	SUB-COMMITTEE	OFFICER
<u>Applications for four to five gaming machines</u>	-	-	<u>Officers in consultation with the Chairman of the Licensing Sub-Committee</u>
<u>Applications for more than five gaming machines</u>	-	<u>By way of a report</u>	-
<u>Decision to give a counter notice to a temporary use notice</u>	-	X	-
<u>Section 284 Order to revoke the automatic entitlement for 2 gaming machine notifications</u>	-	X	-

~~Annex-ANNEX DA~~

Ward Councillor Call-in

Where a Ward Councillor makes representations upon an application within their ward, in writing, to the relevant Head of Service for Administrative-Licensing, Technical and Business Services within the appropriate statutory period of consultation for the application, and this representation has been forwarded to the Licensing Authority, that application shall be ~~submitted~~ scheduled to be heard by the Licensing Sub-Committee for determination. The Ward Councillor must include in their representations the reasons why they wish the application to be determined by the Sub-Committee and how the application adversely affects the licensing objectives.-

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HILLINGDON
LONDON

Appendix C - Equality Impact Assessment

STEP A) Description of what is to be assessed and its relevance to equality

What is being assessed? Please tick

Review of a service Staff restructure Decommissioning a service

Changing a policy Tendering for a new service A strategy or plan

The review of the Council's Statement of Gambling Policy which takes place every 3 years and must be in place by the end of 2022.

Who is accountable? E.g. Head of Service or Corporate Director

London Borough of Hillingdon – 'The Licensing Authority'

Date assessment completed and approved by accountable person

1st August 2022

Names and job titles of people carrying out the assessment

Daniel Ferrer, Licensing Team Manager

A.1) What are the main aims and intended benefits of what you are assessing?

Comprehensive review and consultation to implement the Council's new Statement of Gambling Policy. As a result, it is intended that this assessment will support effective and efficient delivery of licensing functions and the Council's objectives and allow for stakeholders views to be taken into account.

A.2) Who are the service users or staff affected by what you are assessing? What is their equality profile?

The main users of the service that will be affected will be the actual applicants. Looking at previous applications and licences granted for premises licence holders, it is clear that they are mainly limited companies such as William Hill, Ladbrokes and Jennings. Therefore, we do not foresee and issues as their relevant applications and documentation will be dealt with by agents or their solicitors.

However, service users who may be affected are potentially staff and customers who work and use certain licenced premises and their services. For example, there are a large number of betting shops in the south parts of the Borough such as Hayes. From inspections and visits to these premises, the equality profile of staff and customers come from a Black, Asian, Minority and Ethnic Background.

Furthermore, another relevant key service user will be residents. Again, residents who are generally based geographically in the south may be affected. They will be made from a Black, Asian, Minority and Ethnic background and have always played an important role when submitting representations/objections and therefore providing a voice for the local community.

A.3) Who are the stakeholders in this assessment and what is their interest in it?

Stakeholders	Interest
Applicants and licence holders	Ensure that they are supported by the Authority in making their applications and kept fully informed of the process and the implications of the reviewed Statement of Gambling Policy.
Residents and Businesses	Ensuring that specific requirements have been met by the applicant/licence holder and they are able to submit their objection/representation if it is valid under the legislation.
Licensing Committee, Cabinet & Council	Ensuring processes are followed in accordance with licensing legislation and that all information is presented to them in full so appropriate, reasonable and proportionate decisions can be made.
Chief Executive, Corporate Directors & Staff	Ensuring processes are followed in accordance with licensing legislation and that all information is presented to them in full so appropriate, reasonable and proportionate decisions can be made.

A.4) Which protected characteristics or community issues are relevant to the assessment? ✓ in the box.

Only tick the boxes which relate to the data you have in A2.

Age	✓	Religion or belief	✓
Disability	✓	Sex	✓
Gender reassignment	✓	Sexual Orientation	✓
Marriage or civil partnership	✓	Community Cohesion	✓
Pregnancy or maternity	✓	Community Safety	✓
Race/Ethnicity	✓	Other – please state	

STEP B) Consideration of information; data, research, consultation, engagement

B.1) Consideration of information and data - what have you got and what is it telling you?

The main source of data and information are the current records kept by the Licensing Authority such as applications for premises licences and gambling permits. In addition, there is the information and feedback received from officers who engage with applicants on the phone or with Management and staff face to face during site visits. It is noted that a number of staff and customers at licenced gambling premises in the geographical south of the borough are from a Black, Asian, Minority and Ethnic Background. This is particularly the case with premises in areas such as Hayes. This is evident when inspections have been carried out to premises such as betting shops.

Consultation

B.2) Did you carry out any consultation or engagement as part of this assessment?

Please tick ✓ NO ✓ YES

If no, explain why:

It was not felt necessary to complete consultation as part of this assessment however, in the implementation of the policy, there will be ongoing engagement

with relevant parties during formal consultation.

B.3) Provide any other information to consider as part of the assessment

The new Statement of Gambling Policy is not anticipated to have a significant impact as there is a strong degree of consistency between the old and new document, it is merely reflecting minor updates to legislation and guidance.

On the whole, the amendments proposed have been drafted to clarify, formalise and, in some cases, simplify the processes in relation to applications under the Gambling Act 2005. The principles governing the Statement of Gambling Policy remain consistent with the previous policy statement and recognise the wider community impacts that the Licensing Authority, residents, business community and other stakeholders must be aware of when participating in the licensing process. The new Statement of Gambling Policy recognises the need for a balance between the rights of businesses and the community.

The Licensing Authority have a public sector equality duty to the following protected characteristics:

- Age
- Disability
- Sex, gender reassignment, sexual orientation
- Pregnancy and maternity
- Race, religion or belief
- Marriage and Civil Partnership

Under the Equality Act 2020 (S.149) a public authority must, in the exercise of its functions, have due regard to the need to:-

- (a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the 2010 Act
- (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

C) Assessment

What did you find in B1? Who is affected? Is there, or likely to be, an impact on certain groups?

C.1) Describe any **NEGATIVE** impacts (actual or potential):

Equality Group	Impact on this group and actions you need to take
Applications from a Black, Asian, Minority and Ethnic background	<p>There will be some staff at Gambling premises from a Black, Asian and Minority Ethnic background whose first language may not be English and who will therefore require some assistance and clarification when Licensing Officers are carrying out their enforcement role. For example, this could mean Officers taking their time and carefully explaining what requirements they are checking, what documents are to be produced and any follow up measures that are needed to comply.</p> <p>In regards to residents and potential difficulties with submitting representations, the Licensing Team will offer advice on the telephone and will accommodate appointments during office hours. In addition, consideration will be given to officers carrying out site visits to meet potential objectors so they are able to gain a better understanding of any proposed application.</p>

C.2) Describe any **POSITIVE** impacts

Equality Group	Impact on this group and actions you need to take
Applications from a Black, Asian, Minority and Ethnic background	<p>Better quality of applications and reports being submitted and as a result residents, responsible authorities and members of the Licensing Committee being well informed to make decisions in considering applications. Residents will feel valued and felt heard when they will be able to communicate their views on behalf of their community. Furthermore, better relationships will be formed with Council Officers and staff and so there will be higher standards of compliance when the applicants operate.</p>

D) Conclusions

The Licensing Team has identified that there a number of gambling premises that have staff and customers from a Black, Asian, Minority and Ethnic background. This will be particularly the case where premises are located in the south of the Borough. In addition, residents in this geographical area will be of a similar background.

Literacy issues may be an issue within these communities and will therefore need to be considered. Local residents will require some assistance with applications, supporting documentation and explanation of Government guidance and the Council's Statement of Gambling Policy.

Licensing Officers will take appropriate steps to explain their enforcement role whilst carrying out inspections and compliance visits to staff and all management. There is already a requirement for authorised officers to leave a formal notice after their inspection fully explaining the reason for their visit and information to full access to records of any inspection. The Licensing Team will offer telephone advice to residents and consideration will be given to meeting residents at Council Offices to assist them in clarifying relevant application forms.

A handwritten signature in black ink, appearing to read 'D. Ferrer', is positioned in the upper left area of the page. The signature is stylized with a large initial 'D' and a horizontal line above it.

Signed and dated: 01.08.22

Name and position: Daniel Ferrer, Licensing Team Manager

STATUTORY PROPOSAL FOR A SPECIALIST ASSESSMENT BASE AND AUTISTIC SPECTRUM DISORDER SPECIALIST RESOURCE PROVISION AT RUISLIP GARDENS PRIMARY SCHOOL

Cabinet Member(s)	Councillor Susan O'Brien
Cabinet Portfolio(s)	Cabinet Member for Children, Families & Education
Officer Contact(s)	Babatunde Balogun – School Place Planning
Papers with report	Appendix 1 - Public Notice Appendix 2 - Full Proposal Appendix 3 – Full Consultation Responses

HEADLINES

Summary	Cabinet will be asked to consider the outcome of Consultation on the proposal to establish a Specialist Assessment Base and Autistic Spectrum Disorder (ASD) Specialist Resource Provision (SRP) at Ruislip Gardens Primary School.
Putting our Residents First	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.</i>
Financial Cost	The adaptation capital work at Ruislip Garden Primary school will be funded from the grant funded Schools SRP/SEND capital programme linked to the DSG safety valve agreement. The pre-tender estimate is £1,270k. The adaptation works will deliver a Specialist Assessment Base for 16 children and an Autistic Spectrum Disorder (ASD) Specialist Resource Provision (SRP) for 12 children.
Relevant Select Committee	Children, Families and Education Select Committee
Wards	All, especially South Ruislip

RECOMMENDATION

That Cabinet consider the responses to the statutory consultation as set out in the report and Appendix 3 and approve the proposal to establish a specialist assessment base and Autistic Spectrum Disorder (ASD) Specialist Resource Provision (SRP) at Ruislip Gardens Primary School.

Reasons for recommendation

Due to the rising demand for special education needs in the Borough, a programme of capital works to create and expand new special schools and units has been initiated and linked to the DSG safety valve recovery programme which was approved by the DFE in June 2022. One of the purposes of the recovery programme is to put mainstream inclusion and high quality SEND services at the heart of education in the Borough and the proposal to establish an assessment base and SRP at Ruislip Gardens Primary school fulfils this purpose.

Ruislip Gardens Primary School is a Council-maintained school. It was built as a 3 Form of Entry (FE) but was reduced to 2FE due to declining roll. The reduction in the Published Admissions Number (PAN) has freed up 6 rooms in the school which can be used to accommodate the assessment base and SRP unit from September 2022. The school's governing body has agreed to the proposal and further discussions are underway to develop the design of areas of the building to be adapted. The Council is also progressing discussions on financial viability, staffing model and service specification for both provisions.

The benefit of establishing a locally based assessment base and SRP in a school setting is that it will improve mainstream inclusion, reduce total cost of out of Borough placement and add more specialist places within the Borough.

Democratic compliance / previous authority

Cabinet in April 2022 has previously agreed to progress the expansion of Ruislip Garden Primary School. Decisions in respect of statutory proposals relating to school organisation, where representations have been received, are considered by the full Cabinet.

SUPPORTING INFORMATION

Need for places

There is a growing demand for special school places for pupils with Education, Health & Care Plans (EHCP) in the Borough and a need to minimise reliance on costly independent provision and long travel for residents. Several mainstream and academy primary schools in the Borough have surplus places due to declining roll. The Council has initiated a programme of capital works to create new special education units using these surplus places. The programme is linked to the DSG safety value recovery programme which the DFE has approved.

Ruislip Garden Primary school is a maintained primary school which has been rated 'Good' by Ofsted since 2019. It was built as a 3FE school but was recently reduced to 2FE, the reduction in PAN has freed up 6 classrooms which the Council proposes to use as special education learning spaces.

The proposed work will create dedicated spaces for an assessment base and a specialist resource provision. The adaptation work is planned to be completed and handed over to the school in July 2023 in preparation for September 2023 intake. The proposal has been discussed in detail with the school and agreed with governors.

Proposal for the Specialist Assessment Base and Autistic Spectrum Disorder Specialist Resource Provision

The assessment base will be the first of its kind in the Borough, so the school will be developing the provision alongside the SEND team in the Council but also draw on various models from other local authorities. The Assessment Base will meet the demand for specialist teaching and further diagnosis of young children aged 3 – 5 who clearly have additional needs but may not have one obvious need. The pupils will be assessed to plan the best future education provision to meet their needs. The assessment base will be created to accommodate 16 full time places, It will be located on the ground floor of the main building and will include 2 classrooms, soft room, 2 group rooms, therapy room, toilets, washing facilities, staff office and toilets. The assessment base will have a head of unit who will be supported by the SEND team in the Council.

The Autistic Spectrum Disorder (ASD) Specialist Resource Provision (SRP) will enable some of the pupils from the Assessment Base to continue in the mainstream school from the age of 5. The students within the provision will predominantly access teaching sessions in the resource base with some supported mainstream class provision following individualised programme to meet their needs outlined in their Education, Health and Care Plan (EHCP). Each session within the SRP will be taught by a Specialist Teacher or a Trained Learning Support Assistant. These groups will have a high level of staff to pupil ratio. Some pupils may spend more time in the SRP than others and it would be the responsibility of the school to manage the specialist offer and inclusion levels in partnership with the parents and in line with the outcomes outlined in their EHCPs. All pupils placed within the SRP by Hillingdon Council will have an EHCP specifying the school's SRP as the appropriate provision to meet their individual needs. Placements will be made by Hillingdon Council following consideration at the SEND panel, a multi-disciplinary panel consisting of education, health and social care professionals, ensuring that the SRP will meet appropriate needs.

The SPR will be created to accommodate 12 full time places for pupils, It will be located on the first floor of the main building and will include 2 classrooms, sensory room, 2 group rooms, therapy room, pupil toilets, staff office and toilets. All areas of the school will be fully accessible to SEN pupils.

The school is fully engaged in the design process with Hillingdon Council to ensure that the provisions is fit for purpose. The adaptation work is being designed to meet DFE area guidelines for SEND and alternative provision, BB104. The Council will meet the capital costs associated with building and site adaptations, ICT, furniture and equipment fit out to ensure suitability of the areas being adapted. It will also provide revenue funding to Ruislip Gardens Primary School for each year based on the number and needs of pupils accessing the provision. In the years of growth, the local authority will provide reasonable diseconomies funding based on budgets provided by the school to recognise any shortfall between funding and costs of operating the new provision whilst numbers are below capacity.

In consultation with the school, the Council will develop service level agreement setting out how the provision will be operated, funded, assessment processes, staff training and structure.

Financial Implications

The adaptation works at Ruislip Gardens Primary school to increase SEND places will be funded from the Schools SRP/SEND capital grant linked to the DSG Safety valve programme. In June 2022, the DFE approved the Council's capital bid totalling £6,962k to expand SEND provision in the Borough. The expansion of Ruislip Gardens primary school was included in the bid at a value of £1,270k. In June 2022 Cabinet Members approved a contract award, and associated capital release of £289k, for multi-disciplinary consultancy services to commence the project.

The adaption works to increase SEND provision supports the DSG recovery plan, with each additional place provided in the Borough estimated to achieve an average saving of £24k from reducing use of more expensive independent out of Borough placements and £11k reductions in SEN transport costs.

RESIDENT BENEFIT & CONSULTATION

Consultation

Formal consultation on the proposal to establish an assessment base and an Autistic Spectrum Disorder (ASD) Specialist Resource Provision (SRP) at Ruislip Gardens Primary school started on the 15th of June and ended on the 15th of July 2022. Information about the consultation was shared to parents and staff by the school on 10th June 2022.

Public Notice of the proposals is set out in Appendix 1 and the full proposal consulted on in Appendix 2.

Part 5, Statutory process:

The prescribed alterations require a minimum of a 4-week consultation period. The formal consultation was designed to ensure that the following received notification of the consultation, in line with the guidance "Making significant changes ('prescribed alterations') to maintained schools":

- the Governing Body/Local Authority (as appropriate);
- the parents of every registered pupil at the school
- if it involves or is likely to affect a school which has been designated as having a religious character:
 - the local Church of England diocese;
 - the local Roman Catholic diocese; or
 - the relevant faith group in relation to the school;
- proposals affecting a special school should go to any LA that has commissioned a place at the school (i.e. all relevant authorities who have made an out of county/Borough placement there); and
- any other body or person that the proposer thinks is appropriate e.g., any affected educational institutions in the area.

The consultation document was available from Wednesday 15th June 2022 to Friday 15th July 2022 on the consultation page of the Hillingdon Council website. This included a brief outline of the proposed change, the full proposal and a questionnaire to obtain feedback in direct response to each proposal.

Information regarding the consultation was publicised to the all the schools within the Borough.

As Hillingdon Council also receives school place applications from residents who live outside of the Borough, the consultation was designed to be inclusive. Therefore, officers contacted the following surrounding Local Authorities:

- London Borough of Ealing
- London Borough of Hounslow
- London Borough of Brent
- London Borough of Harrow
- Hertfordshire County Council
- Buckinghamshire County Council
- Slough Borough Council

No responses were received.

The details of the proposal were also shared with the following groups: Parent Carer Forum and Hillingdon Autistic Care and Support (HACS). No responses were received.

Consultation Responses (set out in full in Appendix 3)

21 responses were received in total during the consultation period and submitted via the online questionnaire and none were received by email. The responses are summarised below and in full in Appendix 3.

Online Questionnaire responses are summarised below:

1. **19** agreed with the proposed Specialist Assessment Base for pupils aged 3 - 5 years at Ruislip Gardens Primary School
 - Yes - 19
 - No - 2
 - Don't know – 0
2. Of the **2** respondents that answered 'No' or 'Don't know', reasons have been provided in Appendix 3.
3. **21** agreed with the proposed Autistic Spectrum Disorder (ASD) Specialist Resource Provision (SRP) at Ruislip Gardens Primary School.
 - Yes - 21
 - No - 0
 - Don't know – 0

4. **None** of the respondents answered 'No' or 'Don't know'.
5. **20** disagreed that the proposed changes will disadvantage any Hillingdon residents.
 - Yes - 1
 - No - 20
 - Don't know – 0
6. **1** respondent agreed that the changes will disadvantage Hillingdon residents' reasons have been provided in Appendix 3.
7. **21** respondents are confirmed their interest in the proposal as:
 - A pupil – 0
 - A parent/ Carer/guardian – 10
 - A staff member – 4
 - A local resident – 3
 - Other – 3
 - Prefer not to say – 1
8. **14** respondents stated that they have children under the age of 18 living in their household.
 - A pupil – 0
 - A parent/ Carer/guardian – 9
 - A staff member – 1
 - A local resident – 2
 - Other – 2
 - Prefer not to say – 0
9. Respondents were invited to state which school(s) their child(ren) currently attend, and the responses were as follows:
 - Ruislip Gardens Primary School
 - Whiteheath
 - Ruislip High School
 - Meadow high
 - Hillside Junior School
 - Hayes park school
 - Bishopshalt
 - Northwood
 - Douay Martyrs Catholic Secondary school
 - Cherry Lane Primary school.
10. Additional comments from the questionnaire have been provided in **Appendix 3**.

Conclusion

The formal statutory consultation helped to collate views and queries from parents/Carers, residents and staff.

The consultation process outlined some of the concerns raised by 2 respondents (1 of whom is a local resident). However, 90% of respondents who are parents, staff and local residents were supportive of the proposal. All parents who have children currently attending the school see the benefits of having both provisions on the school site. The only concern raised by one of the parents was the need for a drop off/pick area for high need pupils and the need to ensure that the provisions are adequately staffed at all times and not taking staff away from the mainstream classrooms.

The proposal is intended to increase the number of special education places in the Borough and help meet the needs of more Hillingdon pupils and parents. To ensure that a positive education experience continues for all pupils, the LA and the school will continue to work with residence to place pupils in most appropriate provisions to meet their individual needs. There will be an ongoing dialogue with parents, carers and families to work collaboratively to demonstrate the culture of inclusive practice is at the heart of the LA and the school.

If approval is granted by the Cabinet, the Education Service will notify the Department for Education and implement the proposal following the requirements set within the document "Making significant changes ('prescribed alterations') to maintained schools" [School organisation: local-authority-maintained schools - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/103121/making-significant-changes-to-maintained-schools.pdf)

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance has reviewed this report and concurs with the financial implications set out above, noting that the recommendation to establish a specialist assessment base and Autistic Spectrum Disorder (ASD) Specialist Resource Provision (SRP) at Ruislip Gardens Primary School.

The Council secured funding in June 2022 from the Department for Education resulting from a bid for capital funding linked to the Dedicated Schools Grant (DSG) deficit recovery safety valve agreement. The funding totalling £6,962k to expand SEND provision in the Borough included expansion of Ruislip Gardens primary school in the bid at a value of £1,270k.

The adaptation supports the DSG recovery plan, with each additional place provided in the Borough is estimated to achieve an average saving of £24k from reducing use of more expensive independent out of Borough placements and £11k reductions in SEN transport costs. The provision of 16 ASD place and 12 SRP places result in a financial benefit of £980k across the Council's Schools and General Fund Budgets.

Legal

The recommendation to establish a specialist assessment base and Autistic Spectrum Disorder (ASD) Specialist Resource Provision (SRP) at Ruislip Gardens Primary School is a prescribed alteration. It is confirmed within the body of the report that the required statutory process has been followed. There are no further legal implications arising from the proposed recommendation.

Infrastructure / Asset Management

The recommendation to establish a specialist assessment base and Autistic Spectrum Disorder (ASD) Specialist Resource Provision (SRP) at Ruislip Gardens Primary School. The Council owns the freehold interest and there are no specific property issues with this proposal.

BACKGROUND PAPERS

[Cabinet decision – 21 April 2022](#)



HILLINGDON
LONDON

**LONDON BOROUGH OF HILLINGDON
Statutory Notice**

**Specialist Assessment Base and Autistic Spectrum Disorder (ASD) Specialist
Resource Provision (SRP) at Ruislip Gardens Primary School
Stafford Road, Ruislip, Middlesex, HA4 6PD
URN: 102416**

**Part 1: Prescribed Alteration to Ruislip Gardens Primary School
(Maintained Community)**

Notice is given in accordance with The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013 that the London Borough of Hillingdon is proposing to establish a Specialist Assessment Base and Autistic Spectrum Disorder (ASD) Specialist Resource Provision (SRP) at Ruislip Gardens Primary School to open in September 2023.

The prescribed alterations will provide:

- 16 places for pupils in the Specialist Assessment Base
- 12 places for pupils with ASD in the SRP

This Notice is an extract from the complete proposal, copies of which may be obtained from School Place Planning Team, Hillingdon Council, Civic Centre, 4E/07, High Street Uxbridge, UB8 1UW

Email: education@hillington.gov.uk.

Within four weeks from the date of publication of this proposal, any person may object to or make comments on the proposal via School Place Planning Team, Hillingdon Council, Civic Centre, 4E/01, High Street, Uxbridge, UB8 1UW

Email: education@hillington.gov.uk.

Responses must be received by 15th July 2022 at 5pm.

Signed: VIKRAM HANSRANI

Date: 15th June 2022

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Hillingdon Council - School Place Planning Consultation

Specialist Assessment Base and Autistic Spectrum Disorder (ASD) Specialist Resource Provision (SRP) at Ruislip Gardens Primary School

Summary

1. Hillingdon Council proposes to open a Specialist Assessment Base and Autistic Spectrum Disorder (ASD) Specialist Resource Provision (SRP) at Ruislip Gardens Primary School to be located within Ruislip Gardens Primary School to open in September 2023. This has been discussed in detail with the school and agreed by the Governors. Ruislip Gardens Primary School has been rated 'Good' by Ofsted since 2019.
2. There will be 16 full time places for pupils in the Specialist Assessment Base. This will be to assess and support children aged 3-5 with additional needs and/ or disability.
3. There will be 12 places for pupils with ASD in the SRP.
4. The students within the provision will predominantly access teaching sessions in the Resource Base with some supported mainstream class provision following individualised programme to meet their needs outlined in their Education, Health and Care Plan (EHCP). Each session within the SRP will be taught by a Specialist Teacher or a Trained Learning Support Assistant. These groups will have a high level of staff to pupil ratio.
5. The Assessment base and the SRP will be located within the main school building. All pupils placed within the SRP by Hillingdon Council will have an EHCP specifying the school's SRP as the appropriate provision to meet their individual needs. Placements will be made by Hillingdon Council following consideration at the SEND panel, a multi-disciplinary panel consisting of education, health and social care professionals, ensuring that the SRP will meet appropriate needs.

Rationale

6. There is high demand for specialist ASD provision in mainstream primary schools. The Assessment Base will meet the demand for specialist teaching and further diagnosis of the young children aged 3 – 5 who clearly have additional needs but may not have one obvious need. The pupils will be assessed to plan the best future education provision to meet their needs.
7. The SRP will enable some of the pupils from the Assessment Base to continue in the mainstream school from the age of 5. They will benefit from some time in mainstream

classes and also some in individual support and small groups with specialists in the SRP base rooms.

Pupil Placement

8. Pupils attending the SRP would be in addition to the mainstream Published Admission Number (PAN) of the school, as their school day would be split between mainstream classes and the SRP. Some pupils may spend more time in the SRP than others and it would be the responsibility of the school to manage the specialist offer and inclusion levels in partnership with the parents and in line with the outcomes outlined in their EHCPs.
9. School places are allocated in accordance with the Children and Families Act 2014, which requires the Local Authority to take into account the child's special educational needs, parental request for schools, and the formal view of the schools requested before making a decision. Places will be allocated based on parental requests wherever possible, unless:
 - a. the school is unsuitable for the child's age, ability, aptitude or SEN
 - b. the placement would be incompatible with the efficient education of the other children with whom your child would be educated,
 - c. the placement would be incompatible with the efficient use of resources.
10. More detailed document on SEND admissions processes for referrals for Special provision will be added to the Hillingdon Council website.

Finance and Resourcing

11. This will be the first Specialist Assessment Base to open in a Hillingdon mainstream school and the Council is committed to it being a beacon of good practice and is finalising with the school the appropriate level of funding. In addition to the fitting out of the Assessment Base there will be some funding for preparing the new Assessment Base and new staff, in the term before it opens.
12. For the SRP Core funding (Element 1) for each pupil on roll will be funded through the schools funding formula (AWPU plus other formula factors). In addition, each pupil will attract £6,000 Element 2 funding through the High Needs Block. Top-up funding (Element 3) will then be allocated based on the needs of each pupil and will be funded in line with the LBH Banded Funding model.
13. For the Specialist Assessment Base each commissioned place will be funded at £10,000 (Element 1 & 2 funding) through the High Needs block. Top-up funding (Element 3) will then be allocated based on the needs of each pupil and will be funded in line with the LBH Banded Funding model.
14. Hillingdon Council will be commissioning the places in this Specialist Assessment Base and SRP to open in September 2023 and will be consulting for 4 weeks from Wednesday 15th June 2022 until Friday 15th July 2022.

How to respond to the consultation

We welcome your feedback. If you would like to make any comments or suggestions in response to the consultation, please complete the online questionnaire by visiting the consultation page www.hillingdon.gov.uk/consultation or by emailing education@hillington.gov.uk.

If you have any questions that have not been covered in the consultation document or that are specific to your circumstances and you would like to discuss, please email education@hillington.gov.uk or call 01895 250063.

Or, you can submit a written response to:

School Place Planning

Hillingdon Council

Civic Centre, 4E/07

High Street

Uxbridge

UB8 1UW

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Appendix 3 - Consultation Responses

Responses received via the questionnaire:

The Local Authority (LA) has responded to comments made within the questionnaire in italics.

1. **19** agreed with the proposed Specialist Assessment Base for pupils aged 3 - 5 years at Ruislip Gardens Primary School
 - Yes - 19
 - No - 2
 - Don't know – 0

2. Of the **2** respondents that answered 'No' or 'Don't know', the following reasons were provided:
 - As this is the age the pupil start accessing EYFS it would take a while for the original setting to be aware that there is a need and then go through referral processes to get into setting to be assessed. Great idea in theory...in practice empty places. Better to have 20 places in the statutory school years.

***LA's Response:** By introducing an early years assessment centre and conducting a regular multi-disciplinary panel capturing the needs of pupils from as young as 1 year old, we will be able to offer a space to those children who require an assessment from 4 years old, to effectively sufficiency plan for statutory school age.*

For those children who have been identified as having special educational needs exceeding the resource that can be provided within a mainstream EYFS setting will be presented at panel to determine whether a space is required, or whether an EHCNA is appropriate in the current setting.

- Places will not be filled or utilised as by time child is recognised in surrounding schools and early years settings referred they would be nearly 5.

***LA's Response:** As above, the needs of the children should be identified prior to entry of a nursery from our health colleagues from 2 year health checks. Therefore, by accessing this information at the earliest stage, we will be able to appropriately allocate spaces to those children with clear special educational needs, likely to require specialist provision at statutory school age. This assessment centre should reduce the impact on mainstream nurseries and increase inclusivity meeting more needs as opposed to allocating a high level of resource for pupils requiring specialised interventions due to needs.*

3. **21** agreed with the proposed Autistic Spectrum Disorder (ASD) Specialist Resource Provision (SRP) at Ruislip Gardens Primary School.
 - Yes - 21
 - No - 0
 - Don't know – 0
4. **None** of respondents answered 'No' or 'Don't know'.
5. **20** disagreed that the proposed changes will disadvantage any Hillingdon residents.
 - Yes - 1
 - No - 20
 - Don't know – 0

6. 1 respondent agreed that the changes will disadvantage Hillingdon residents reasons were provided:
- If the children are transported into school by LA please can it ensure that the road leading up the school and out is not blocked.
LA's Response: *the school will send a letter to all parents reminding them to be considerate of other road users while dropping and picking up their children.*
 - Can there be a clear designated area for drop off and pick up for the children with high needs.
LA's Responses: *The adaptation design and works to establish the 2 SEN provisions includes creating a designated drop off and pick up area for children with high needs*
7. 21 respondents are confirmed their interest in the proposal as:
- A pupil – 0
 - A parent/ Carer/guardian – 10
 - A staff member – 4
 - A local resident – 3
 - Other – 3
 - Prefer not to say – 1
8. 14 respondents stated that they had children under the age of 18 living in their household.
- A pupil – 0
 - A parent/ Carer/guardian – 9
 - A staff member – 1
 - A local resident – 2
 - Other – 2
 - Prefer not to say – 0
9. Respondents were invited to state which school(s) their child(ren) currently attend and the responses were as follows:
- Ruislip Gardens Primary School
 - Whiteheath
 - Ruislip High School
 - Meadow high
 - Hillside Junior School
 - Hayes park school
 - BishopsHalt
 - Northwood
 - Douay Martyrs Catholic Secondary school
 - Cherry Lane Primary school.
10. Additional comments from the questionnaire were provided as follows:
- Can the school also consider sickness and absence of staff will not impact the running of the school and taking teachers and staff to cover the ARP. Also consider not merging classes to cover absence etc at the base.
LA's Response: *A staffing model will be established to ensure that both SEN Provisions are adequately resourced with experienced staff to ensure that all needs of the pupil are met.*

- The consultation document needs changing as it states in the opening paragraph "Harlington School has been rated 'Good' by Ofsted since 2019". Surely this is a legal document and needs changing before the consultation is complete.
LA's Response: *The change was made and document re- issued on the 15th June 2022.*

- Rather than under used assessment places, proposed SRP planned places should be increased to 20.

LA's Response: *SRP provision is being increased across the borough as we have identified a need for ASD SRP provision in both primary and secondary. For an SRP to be successful, there needs to be a balanced amount of targeted interventions and reintegration into mainstream curriculum lessons with support. By increasing numbers, the level of staffing, space and group sizes increase, therefore creating challenges with providing the bespoke support.*

- Funding element should be in line with all SRP within Hillingdon - agree with elements 1&2. Disagree with funding from element 3; there should not be additional top up funding per child on top of this £10k funding per pupil, this would not be in parity with other SRP across the borough.

LA's Response: *All SRPs in Hillingdon receive top up funding for students in SRPs in line with their needs in EHCP. Top up funding is calculated within Resource Allocation System using the same mechanism for all SRP learners.*

The LBH will commission the number of places as set out in Schedule 1 of SLA. Funding will be payable based on learner numbers as follows:

- *Number of occupied places - multiplied by £6,000, students in these places will also attract per-student funding through the mainstream schools funding formula (AWPU) (Basic Entitlement, Deprivation etc.)*
- *Number unoccupied of places - multiplied by £10k (the High Needs Funding rate per place)*
- *Plus Top up funding for each student placed (at a level in accordance with LBH funding model)*

Funding paid to SRP

Actual funding paid to the School must be compliant with the High Needs Funding methodology of Place Plus. Core funding - Element 1 (E1) per-student funding through the schools funding formula plus Element 2 (E2) £6,000 = £10,000 (approx.)

Top up funding Element 3 (E3) = the funding rate per student. Top up funding will follow the student in real time on a monthly basis and based on the needs of the student.

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PUBLIC PREVIEW:

MATTERS TO BE CONSIDERED LATER IN PRIVATE

Cabinet Member(s)	As appropriate
Cabinet Portfolio(s)	As appropriate
Officer Contact(s)	Mark Braddock – Democratic Services
Papers with report	None

HEADLINES

Summary	<p>A report to Cabinet to provide maximum transparency to residents on the private matters to be considered later in Part 2 of the Cabinet meeting and agenda.</p> <p>This will enable Cabinet Members to openly discuss such matters generally in public, and via the Council’s live broadcast of the meeting, without prejudicing their later consideration in private.</p>
Putting our Residents First	This report supports the following Council objectives of: <i>Our Natural Environment; Our Built Environment; Our Heritage and Civic Pride; Strong financial management</i>
Financial Cost	As set out in the report.
Relevant Select Committee	As set out in this report under each item – however, this item is not for scrutiny call-in as it is information only.
Ward(s)	As set out in the report

RECOMMENDATION

That Cabinet note the reports to be considered later in private and Part 2 of the Cabinet agenda and comment on them as appropriate for public information purposes.

Reasons for recommendation

Why are certain reports considered in private?

As a transparent, democratic organisation, the Council’s Cabinet will consider matters in public on Part 1 of this Cabinet agenda. However, there will inevitably be some reports that will need to be considered in private. These would generally relate to contracts, property transactions or commercially sensitive information, for example, tender bids from commercial organisations,

which if made public, could prejudice the Council's ability secure value-for-money for resident taxpayers.

This information is also called 'exempt' information and is considered in Part 2 of any Cabinet agenda by applying the relevant section of the Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended), in that the report contains certain information and that the public interest in withholding that information outweighs the public interest in disclosing it.

How can the public find out more about the private reports?

To ensure maximum transparency when the Cabinet considers such private reports:

- 1) They are first given advance notice on the Cabinet's Forward Plan in summary form setting out the reason why they will be considered in private. The [Forward Plan](#) is a public document setting out all the expected decisions the Cabinet will make over the coming year, except those that are urgent, and is available on the Council's website to view;
- 2) This report provides a fuller public preview of the matters to be discussed in Part 2 of this Cabinet meeting and gives an opportunity for Cabinet Members to highlight issues of significance within and for public information purposes, without prejudicing their later fuller consideration in private. It also sets out the recommendations in general terms that are being proposed for a decision on.
- 3) Consideration of this report will also be broadcast live on the Council's YouTube channel: Hillingdon London, and available for viewing afterwards, for wider democratic engagement.
- 4) After these private reports are considered in Part 2 of this Cabinet meeting, Cabinet's full decisions on them will then be published on the Council's website the day after the Cabinet meeting, along with the decisions on the other matters already considered in public.

Alternative options considered

Cabinet could resolve to release any private report into the public domain in extraordinary or highly exceptional cases, where it considers the public interest in disclosing the information outweighs the public interest in withholding it. However, to ensure greater transparency on all private matters considered, this public preview item is advised as the most suitable way forward.

Legal comments

Such private matters are considered in accordance with Local Government Act 1972 (as amended) Access to Information provisions and also The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012. This report enables such matters to be discussed in public as far as is possible under the relevant legislation.

SUPPORTING INFORMATION

Item 11 - Framework for Home Care and Outreach Support Services	
Relevant Cabinet Member(s)	Relevant Ward Select Committee
<p>Cllr Jane Palmer - Health & Social Care Cllr Susan O'Brien - Children, Families & Education</p>	<p>All Wards Health and Social Care / Children, Families & Education</p>
Information	General recommendations
<p>Adults social care services currently provide approximately 18,949 hours of community-based services to residents per week, including homecare and outreach support. Within Children's Services, packages of care are provided for approximately 250 young people across the Borough. Of these 150 children are provided with outreach and home-based services.</p> <p>This report sets out the process undertaken to establish a proposed new Framework for Home Care and Outreach Support Services for Adults and Children.</p> <p>The framework has been developed to work alongside and complement the existing two lead provider contracts that operate in the Borough, i.e. when the two providers are either unable to take the package of care or the resident makes a personal choice, the providers on the framework will be used to commission the service for the resident.</p> <p>To proposed framework will ensure that there are good choices of support for the resident, be it an adult or child in need of care. It also ensures that the Council has a portfolio of viable agencies who compliment the lead providers to ensure that there is flexibility to meet fluctuation in demand.</p> <p>The proposed framework is intended to replace the existing model of a Dynamic Purchasing System and it is recommended that this system continues for a temporary period until the proposed new framework is in place, for service continuity reasons.</p>	<p>That the Cabinet:</p> <ol style="list-style-type: none"> 1. Accept the tender from Domiciliary care providers for admission to the London Borough of Hillingdon framework of Home Care and Outreach Services for Adults and Children. 2. Agree to extend the existing Dynamic Purchasing System for a short term period.

Item 12 - Children's Advocacy and Independent Visitor Service	
Relevant Cabinet Member(s)	Relevant Ward Select Committee
Cllr Susan O'Brien - Children, Families & Education	All Wards Children, Families & Education
Information	General recommendations
<p>This report seeks approval to award a contract for the provision of advocacy services and an Independent Visitor Scheme in order that the Council can meet its statutory obligations when supporting children and young people.</p> <p>Good quality advocacy services help transform vulnerable children's lives, enabling them to have an independent voice, break down communication barriers, and promote better outcomes.</p> <p>The Independent Visitor Service provides a reliable, consistent, constant and independent friend to a looked after child. Independent visitors are appointed to children and young people looked after by the Council, who would benefit from having an independent adult in their lives.</p> <p>The proposed contract will ensure that the Council has in place an effective support service for looked after children and care leavers and continues to meet its statutory obligations.</p> <p>A competitive open tender was run to ensure the Council's compliance with legislation and to ensure best use of public money.</p>	<p>That the Cabinet accept the proposed tender for the provision of Advocacy Services and an Independent Visitor Scheme to the London Borough of Hillingdon.</p>

Item 13 - Provision of a Tree Maintenance Service	
Relevant Cabinet Member(s)	Relevant Ward Select Committee
Cllr Eddie Lavery - Residents' Services	All Wards Residents' Services
Information	General recommendations
<p>The Council's tree maintenance service includes tree surveying, limb/branch removal, pruning, removal of suckers and epicormic shoots, crown lifting, thinning and reduction, re-pollarding, removal of deadwood, felling, stump removal, reinstatement of soft areas, root pruning, and climbing inspection.</p> <p>Contractors that were invited to tender for this service were required to be approved by the Arboricultural Association to demonstrate industry best practice.</p> <p>The tender offering best value to the Council is being recommended.</p> <p>The proposed contract will also support a greener and more sustainable environment for residents and support the Council's Strategic Climate Action Plan.</p>	<p>That the Cabinet accept the tender for the provision of Tree Maintenance Services to the London Borough of Hillingdon.</p>

Item 14 - Bed-based intermediate care service contracts	
Relevant Cabinet Member(s)	Relevant Ward Select Committee
Cllr Jane Palmer - Health & Social Care	All Wards Health & Social Care
Information	General recommendations
<p>The Council, working with its partners and the NHS, provide a range of short-term services to enable residents to return home more quickly after a hospital stay or avoid going into hospital unnecessarily.</p> <p>This helps to prevent the escalation of needs that is associated with increased lengths of stay in hospital, including the risk of hospital acquired infections. By enabling people who do not require treatment in Hillingdon to be discharged, it will also release hospital beds for other people who are acutely unwell.</p> <p>Bed-based intermediate services, in particular, support residents to undertake activities of daily living in a safe environment pending assessment and determination of their ongoing care needs and return to their usual place of residence or an onward destination that will address their assessed needs.</p> <p>The report to Cabinet seeks to award different contracts to home providers following a competitive tender process to provide such services based on 4 different lots:</p> <ol style="list-style-type: none"> 1. Nursing (non-weight bearing and general nursing) 2. Nursing dementia 3. Residential dementia 4. Residential 	<p>That Cabinet accept tenders for the 4 different lots for the provision of bed-based intermediate care services to the London Borough of Hillingdon.</p>

<p>Item 15 - The Council's Workflow and Document Management System</p>	
<p>Relevant Cabinet Member(s)</p>	<p>Relevant Ward Select Committee</p>
<p>Cllr Douglas Mills - Corporate Services</p>	<p>N/A Finance & Corporate Services</p>
<p>Information</p>	<p>General recommendations</p>
<p>This report seeks approval to award a contract to the incumbent provider for the provision of continued support and maintenance of their Workflow and Document Management System, including its migration and upgrade to the supplier's cloud infrastructure.</p> <p>This system enables custom workflow processes and the storing of documents across many of the Council's key business service areas, including Corporate Finance, Corporate Fraud, Democratic Services, Housing, Human Resources, Revenues & Benefits and Social Care.</p> <p>The system integrates with many of the Council's other third-party business systems, enabling both resident-facing and back-end processes to work effectively, more efficiently and in an automated way.</p> <p>The proposed new contract includes a major upgrade to the supplier's fully hosted browser-based solution ensuring that the system is more resilient and faster.</p> <p>The procurement process was undertaken via the Government eMarketplace on a Crown Commercial Services Framework.</p>	<p>That the Cabinet agree a direct award for the provision of a Workflow and Document Management System to the London Borough of Hillingdon.</p>

Item 16 - Water Quality Services Contract	
Relevant Cabinet Member(s)	Relevant Ward Select Committee
Councillor Jonathan Bianco Cabinet Member for Property, Highways and Transport	All Wards Property, Highways & Transport
Information	General recommendations
<p>The Council has a legal duty to adopt appropriate measures to minimise the risk of Legionella Bacteria in the water systems of all those properties for which it has a responsibility.</p> <p>The proposed new Water Quality Services Contract will ensure compliance with health and safety legislation and ensure the Council continues to deliver safe and healthy water to residents, businesses, schools, corporate properties and other service users within the Borough.</p> <p>Following a competitive tender exercise, a contractor has been recommended to Cabinet for approval.</p>	<p>That the Cabinet accept a tender for the provision of the Water Quality Services to the London Borough of Hillingdon.</p>

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Exempt information by virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972 (as amended).

Agenda Item 12

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Agenda Item 13

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Agenda Item 15

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Agenda Item 16

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