NOTICE OF MEETING

CABINET

Tuesday, 6th February, 2024, 6.30 pm - George Meehan House, 294 High Road, Wood Green, N22 8JZ (watch the live meeting Here and watch the recording here)

Councillors: Peray Ahmet (Chair), Mike Hakata, Emily Arkell, Zena Brabazon, Dana Carlin, Seema Chandwani, Lucia das Neves, Ruth Gordon, Adam Jogee and Sarah Williams

Quorum: 4

1. FILMING AT MEETINGS

Please note that this meeting may be filmed or recorded by the Council for live or subsequent broadcast via the Council's internet site or by anyone attending the meeting using any communication method. Although we ask members of the public recording, filming or reporting on the meeting not to include the public seating areas, members of the public attending the meeting should be aware that we cannot guarantee that they will not be filmed or recorded by others attending the meeting. Members of the public participating in the meeting (e.g. making deputations, asking questions, making oral protests) should be aware that they are likely to be filmed, recorded or reported on.

By entering the meeting room and using the public seating area, you are consenting to being filmed and to the possible use of those images and sound recordings.

The chair of the meeting has the discretion to terminate or suspend filming or recording, if in his or her opinion continuation of the filming, recording or reporting would disrupt or prejudice the proceedings, infringe the rights of any individual or may lead to the breach of a legal obligation by the Council.

2. APOLOGIES

To receive any apologies for absence.

3. URGENT BUSINESS

The Chair will consider the admission of any late items of Urgent Business. (Late items of Urgent Business will be considered under the agenda item where they appear. New items of Urgent Business will be dealt with under Item 22 below. New items of exempt business will be dealt with at Item 33 below).

4. DECLARATIONS OF INTEREST

A Member with a disclosable pecuniary interest or a prejudicial interest in a matter who attends a meeting of the authority at which the matter is considered:

(i) must disclose the interest at the start of the meeting or when the interest becomes apparent, and
(ii) may not participate in any discussion or vote on the matter and must withdraw from the meeting room.

A Member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Register of Members' Interests or the subject of a pending notification must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal interests and prejudicial interests are defined at Paragraphs 5-7 and Appendix A of the Members' Code of Conduct.

5. NOTICE OF INTENTION TO CONDUCT BUSINESS IN PRIVATE, ANY REPRESENTATIONS RECEIVED AND THE RESPONSE TO ANY SUCH REPRESENTATIONS

On occasions part of the Cabinet meeting will be held in private and will not be open to the public if an item is being considered that is likely to lead to the disclosure of exempt or confidential information. In accordance with the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 (the "Regulations"), members of the public can make representations about why that part of the meeting should be open to the public.

This agenda contains exempt items as set out at Item 23: Exclusion of the Press and Public. No representations with regard to these have been received.

This is the formal five clear day notice under the Regulations to confirm that this Cabinet meeting will be partly held in private for the reasons set out in this Agenda.

6. MINUTES (PAGES 1 - 18)

To confirm and sign the minutes of the meeting held on 16 January 2024 as a correct record.

7. DEPUTATIONS/PETITIONS/QUESTIONS

To consider any requests received in accordance with Standing Orders.

8. MATTERS REFERRED TO CABINET BY THE OVERVIEW AND SCRUTINY COMMITTEE

The Scrutiny Budget Recommendations will be considered as part of Item 9.

There will be an addendum with additional Scrutiny recommendations following the meeting on the 1st of February 2024.

9. 2024-25 BUDGET AND 2024-2029 MEDIUM TERM FINANCIAL STRATEGY REPORT (PAGES 19 - 188)

Report of the Director for Finance. To be introduced by the Cabinet Member for Finance and Local Investment.

Following public consultation and Scrutiny Review, this report will set out the details of the proposed budget for 2024/25 and MTFS through to 2028/29, including savings, growth and capital proposals. The report will also set out details of funding for 2024/25 and, if available, the remainder of the planning period and highlight areas of risk. The report also includes details of the proposed HRA budget for 2024/25 and MTFS to 2028/29 including proposed 5-year capital investment and funding. The report will be for onward approval by Full Council on the 04 of March when it will include the details of the council tax resolution.

10. SCHOOL STREETS - 2022/23 STATUTORY CONSULTATION(NON- KEY) (PAGES 189 - 352)

Report of the Director of Environment and Resident Experience. To be introduced by the Cabinet Member for Climate Action, Environment, and Transport and Deputy Leader of the Council.

To consider any objections made in response to the statutory consultation for 2022/23 School Streets and to decide whether to make the associated traffic orders and implement the projects.

11. HARINGEY SEND TOP UP AND HIGH NEEDS FUNDING BANDING (PAGES 353 - 438)

Report of the Director of Children's Services. To be introduced by the Cabinet Member for Children, Schools, and Families.

Following public consultation, Cabinet approval is required to implement the new SEND Top Up and High Needs funding bandings for children and young people with SEND.

12. ADMISSION TO SCHOOLS DETERMINED ADMISSION ARRANGEMENTS FOR 2025/26 (PAGES 439 - 520)

Report of the Report of the Director of Children's Services. To be introduced by the Cabinet Member for Children, Schools, and Families.

Following public consultation held between November 2023 and January 2024, Cabinet is asked to determine the admission arrangements for admission to community nursery, primary, junior and secondary schools and to St Aidan's Voluntary Controlled school and for sixth form admission for the year 2025/26.

13. SHAP (SINGLE HOMELESS ACCOMMODATION PROGRAMME) FUNDING (PAGES 521 - 686)

Report of the Director of Placemaking and Housing. To be introduced by Cabinet Member for Housing, Private Renters and Planning.

This report recommends accepting a grant from the GLA through the Single Homelessness Accommodation Programme (SHAP) Fund.

14. ACQUISITION OF NEW AFFORDABLE HOMES AT THE ST ANN'S HOSPITAL SITE (PAGES 687 - 706)

Report of the Assistant Director for Housing. To be introduce by Cabinet Member for Council Housebuilding, Placemaking, and Local Economy.

A report seeking approval to acquire 38 London Affordable Rent properties at pre-construction stage within Phase 1a of the residential scheme being delivered on land at the former St Ann’s General Hospital, St Ann’s Road, N15 3TH and to approve delegated authority to Director of Placemaking and Housing in consultation with others to acquire the London Affordable Rent accommodation within subsequent phases in the same scheme.

15. APPOINTMENT OF COMMERCIAL PROPERTY MANAGEMENT PROVIDER FOR 40 CUMBERLAND ROAD (PAGES 707 - 718)

Report of the Assistant Director for Housing. To be introduced by the Cabinet Member for Council Housebuilding, Placemaking, and Local Economy.

Approval of the decision to appoint a commercial property management provider to manage the Enterprise Hub at 40 Cumberland Road following a competitive open tender process.

16. HARINGEY SAFETY VALVE PROGRAMME: SEND RESOURCE PROVISIONS (PAGES 719 - 752)

The report of the Director of Children's Services. To be introduced by the Cabinet Member for Children, Schools, and Families.

This paper is seeking approval from elected members for the creation of six separate resource provisions to create 118 places in borough for children and

young people, with social emotional and mental health (SEMH), autism spectrum condition (ASC), and complex needs. The provisions will be delivered within the Safety Valve Programme funding envelope of £12.4m.

17. EXTENSION OF TWELVE BLOCK CONTRACTS FOR THE PROVISION OF HOME SUPPORT AND REABLEMENT SERVICES (PAGES 753 - 764)

Report of the Director of Adults, Health, and Communities. To be introduced by the Cabinet Member for Health, Social Care, and Wellbeing.

Agreement of a full extension to the twelve block contracts for the provision of adult social care home support and reablement services, as allowed for in the original Cabinet decisions.

18. APPROVAL FOR MEANWHILE USE OF THE OSBORNE GROVE NURSING HOME BUILDING AS THE VENUE FOR THE ROUGH SLEEPER NIGHT SHELTER AND INSOURCING THE ROUGH SLEEPING NIGHT SHELTER SUPPORT PROVISION (PAGES 765 - 780)

Report of the Director of Adults, Health, and Communities. To be introduced by Cabinet Member for Housing Services, Private Renters, and Planning.

Approval will be sought for short-term meanwhile use of Osborne Grove Nursing Home to change from temporary accommodation to the Rough Sleeper Night Shelter and SWEP (severe weather emergency protocol) accommodation. There will be a further decision on Insourcing the Rough Sleeping Night Shelter support provision.

19. LAHF (LOCAL AUTHORITY HOUSING FUND) HOUSING FIRST FUNDING (PAGES 781 - 786)

Report of the Director of Placemaking and Housing. To be introduced by the Cabinet Member for Housing, Private Renters and Planning

This report recommends accepting grant from the Department for Levelling Up, Housing and Communities through the Local Authority Housing Fund – second funding round ('LAHF R2').

20. GOURLEY TRIANGLE: ACQUISITIONS PROGRAMME (PAGES 787 - 798)

Report of the Director of Placemaking and Housing. To be introduced by the Cabinet Member for Council Housebuilding, Placemaking, and Local Economy.

This report sets out a delivery approach for the Gourley Triangle site in Seven Sisters and seeks approval to acquire a number of third party land interests within the site.

21. MINUTES OF OTHER BODIES (PAGES 799 - 816)

To note the minutes of the following:

Cabinet Member Signing

17.01.2024
22.01.2024

Corporate parenting Advisory Committee 02.10.2023

22. NEW ITEMS OF URGENT BUSINESS

As per item 3.

23. EXCLUSION OF THE PRESS AND PUBLIC

Note from the Democratic Services and Scrutiny Manager

Items 24 to 31 allow for consideration of exempt information in relation to items 13 to 20 & 6.

TO RESOLVE

That the press and public be excluded from the remainder of the meeting as items 25 to 31 contain exempt information as defined under paragraphs 3 and 5, Part 1, Schedule 12A of the Local Government Act 1972:

Information relating to the financial or business affairs of any particular person (including the authority holding that information).

Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

24. EXEMPT SHAP (SINGLE HOMELESS ACCOMMODATION PROGRAMME) FUNDING (PAGES 817 - 824)

To consider exempt information relating to item 13.

25. EXEMPT - ACQUISITION OF NEW AFFORDABLE HOMES AT THE ST ANN'S HOSPITAL SITE (PAGES 825 - 842)

To consider exempt information pertaining to item 14.

26. EXEMPT - APPOINTMENT OF COMMERCIAL PROPERTY MANAGEMENT PROVIDER FOR 40 CUMBERLAND ROAD (PAGES 843 - 846)

To consider exempt information pertaining to item 15.

27. EXEMPT HARINGEY SAFETY VALVE PROGRAMME: SEND RESOURCE PROVISIONS (PAGES 847 - 848)

To consider exempt information pertaining to item 16.

28. EXEMPT - EXTENSION OF TWELVE BLOCK CONTRACTS FOR THE PROVISION OF HOME SUPPORT AND REABLEMENT SERVICES (PAGES 849 - 852)

Exempt information pertaining to item 17.

29. EXEMPT - APPROVAL FOR MEANWHILE USE OF THE OSBORNE GROVE NURSING HOME BUILDING AS THE VENUE FOR THE ROUGH SLEEPER NIGHT SHELTER AND INSOURCING THE ROUGH SLEEPING NIGHT SHELTER SUPPORT PROVISION. (PAGES 853 - 870)

Exempt information pertaining to item 18.

30. EXEMPT - LAHF (LOCAL AUTHORITY HOUSING FUND) HOUSING FIRST FUNDING (PAGES 871 - 886)

As per item 19.

31. EXEMPT - GOURLEY TRIANGLE: ACQUISITIONS PROGRAMME (PAGES 887 - 928)

To consider exempt information pertaining to item 20.

32. EXEMPT - MINUTES (PAGES 929 - 930)

To confirm and sign the exempt minutes of the meeting held on 16 January 2024 as a correct record.

33. NEW ITEMS OF EXEMPT URGENT BUSINESS

As per item 3.

Ayshe Simsek, Democratic Services and Scrutiny Manager
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Fiona Alderman
Head of Legal & Governance (Monitoring Officer)
George Meehan House, 294 High Road, Wood Green, N22 8JZ

Monday, 29 January 2024

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Agenda Item 6

MINUTES OF MEETING Cabinet HELD ON Tuesday, 16th January, 2024, 6.30pm – 7.32pm

PRESENT:

Councillors: Peray Ahmet (Chair), Mike Hakata, Emily Arkell, Zena Brabazon, Dana Carlin, Seema Chandwani, Ruth Gordon, Adam Jogee and Sarah Williams

ALSO ATTENDING: Cllr da Costa online

55. FILMING AT MEETINGS

The Chair referred to the filming at meetings notice and attendees noted this information.

56. APOLOGIES

There were apologies for absence from Cllr das Neves and apologies for lateness from Cllr Gordon.

57. URGENT BUSINESS

There were no items of urgent business.

58. DECLARATIONS OF INTEREST

Cllr Arkell declared a disclosable pecuniary interest in item 9 and would recuse herself from the meeting for this item.

Cllr Hakata and Cllr Chandwani declared personal interests in item 9, and stated for the record that they did not own or have access to a motor vehicle and therefore were not eligible for application to receive permits through the estate management scheme.

59. NOTICE OF INTENTION TO CONDUCT BUSINESS IN PRIVATE, ANY REPRESENTATIONS RECEIVED AND THE RESPONSE TO ANY SUCH REPRESENTATIONS

None received

60. MINUTES

RESOLVED

To approve the minutes of the meeting held on the 5th of December 2023 as a correct record of the meeting.

61. DEPUTATIONS/PETITIONS/QUESTIONS

There were no deputations received.

62. MATTERS REFERRED TO CABINET BY THE OVERVIEW AND SCRUTINY COMMITTEE

No items received.

63. AMENDMENTS TO THE ESTATE PARKING MANAGEMENT SCHEME

(Cllr Arkell left the room for this item)

The Cabinet Member for Housing Services, Private Renters and Planning introduced the report which sought approval to amendments to the Estate Parking Management Scheme (EPMS), as approved at Cabinet on 8 December 2020 following the insourcing of the former Homes for Haringey into Haringey Council. This report also sought approval for funding of the scheme as set out in section 11 of the attached report.

(Cllr Gordon entered the meeting at 6.39pm)

The following information was outlined by the Cabinet Member:

- The proposed scheme would make estate parking fairer by guaranteeing every household have access to one parking permit, providing dedicated disabled parking bays to those who need them, ensuring the swift removal of abandoned cars, and preventing trespassing.

- The new scheme would be introduced using traffic management orders and enforced by our Parking Services' civil enforcement officers.

- An insourced service would monitor estate parking more frequently and more effectively.

- A limit of one permit per household was proposed to reduce parking pressure on estates and discourage excessive car use in line with Council climate and air quality commitments.

- To allow social care staff, NHS health professionals, charity, or not-for-profit employees to provide care to residents, the existing Care at Home parking permit would allow parking both on streets and on estates. The parking process would be more straightforward by bringing estate parking in line with parking across the borough, meaning there would no longer be a need for two separate permits.

- Permits would be available for less than 14 pence a day. The permit charge was in place solely to cover to cost of the scheme.

- There was a commitment to review the parking schemes annually.

In response to questions from Cllr Hakata and Cllr da Costa, the following information was provided.

- With regards to meeting residents needs for bike parking and making provision for future increased need, this would be picked up in the engagement process. There would need to be consideration that each housing estate would have differing needs, and this will be explored more fully in the planned engagement.

- Furthermore, in line with the delegation provided to the Cabinet Member to manage consultation and engagement with estate residents, she would ensure that provision of cycling parking was considered as part of the consultation.

- If there were circumstances where residents wanted an extra permit, they could purchase CPZ permits to park. This would be through the same Council system used for CPZ permits and visitor permits.

- Haringey housing fleet vehicles would not need a permit to park on the estates, but private contractors would need a visitor permit.

RESOLVED

1. To note that, before a final decision to implement the proposals may be taken, any representations submitted to the Council following consultation under s105 Housing Act 1985 must be considered; and delegates authority to the Director of Placemaking and Housing, following consultation with the Cabinet Member for Housing Services, Private Renters and Planning, to consider any representations which have been submitted as a result of S105 consultation and then to take the decision as to whether to implement the EPMS scheme.

2. To note that Parking Services will assume the responsibility for the operational management and maintenance of the scheme under the provisions of the TMOs, as approved in the 2020 Report, included as Appendix 6 to this report.

3. To approve the proposed EPMS permit offer, as shown in Appendix 1, including new charges for estate resident parking permits, and the required capital expenditure, to be put forward in the 2024 to 2029 HRA Medium Term Financial Strategy (MTFS) budget report for Cabinet in February 2024.

4. To approve the implementation costs as outlined in Appendix 2.

5. To note that Parking Services, in partnership with the Housing Engagement Team commissioned by Housing Services, manages consultation and

engagement with estate residents (which is consistent with Cabinet's decision to approve the 2020 Report, included as Appendix 6).

6. To approve, for all affected housing estates, the amended resident engagement resource model and process, outlined in Appendix 3, which delivers a resident-led scheme focused on each estate, and which will be utilised to enable the Council to comply with its duty to consult under S105 of the Housing Act 1985.

7. To delegates approval of consultation materials to the Director of Placemaking and Housing.

8. To recommend that statutory consultation, for estate parking TMOs, as outlined in Appendix 3, takes place following the engagement process and that recommendations following statutory consultation are then taken to Cabinet for approval.

9. To agree development of a new estate parking policy, aligned to the Council's CPZ policy, subject to consultation and engagement to be submitted for Cabinet approval later in 2024.

10. To agree that the Estate Controlled Parking Scheme adopts the same Disabled Parking Place Policy as used by the CPZ Parking Scheme.

11. In the event that Wing Security Ltd remains operational at the relevant time, to note and approve that the Council shall undertake the prescribed process under the Transfer of Undertaking (Protection of Employment) Regulations 2006 (TUPE) for the insourcing of parking enforcement staff.

Reasons for decision

The current Estate Controlled Parking Scheme (ECPS) is enforced under contract law, with terms and conditions for parking displayed on signs on estates included in the scheme.

The ECPS has become ineffective following the introduction of the Protection of Freedoms Act 2012 and changes to government guidance with vehicle keeper information no longer being provided by the Driver and Vehicle Licensing Agency (DVLA) to private contractors on private land owned by local authorities in London. This means there is no mechanism to contact vehicle owners following issue of penalty charge notices (PCNs) for contravention of parking rules on the estates, with the result that we are unable to effectively collect from PCNs issued. This has also had an impact on the ability to remove abandoned vehicles under tenancy and leaseholder agreements.

These limitations on enforcement have resulted in a scheme which is financially unviable for private contractors that rely on revenue from PCNs. Subsequently, there are parking problems on Haringey estates which cannot be addressed under the current arrangements.

This led to the Council's enforcement agent for estate parking, Wing Parking Ltd., ceasing operation in December 2022. An extension to the enforcement contract has been arranged with the parent company, Wing Security Ltd. to the end of May 2024. Officers are currently reviewing and discussing the possibility for an extension to the start of the new EPMS, pending agreement from the contractor and all parties concerned. Wing Security Ltd currently employs three enforcement staff; any enforcement staff would need to be given the option to transfer to Haringey Council's Parking Enforcement Team via the TUPE process if Wing Security Ltd is in operational up to the time enforcement operation is assumed by the Haringey Council Parking Enforcement Team.

A traffic management order (TMO) based scheme is the preferred solution because it is the only option which meets the aims of the estate parking review to deliver a financially viable scheme with the powers to effectively control parking and meets residents' needs as well as assisting in tackling the climate change emergency. In addition, a TMO scheme is the Department for Transport's recommended solution and is operated successfully by neighbouring boroughs including Enfield and Islington**.**

Bringing the delivery of estate parking enforcement in-house to Haringey Council's own Parking Service meets the objectives of the estate parking review established by Cabinet in the 2020 Report and will not be subject to the limitations which affect the private enforcement of the current EPMS. This will allow Haringey Council to share resources and expertise in a sustainable way to generate efficiencies and savings. In addition, estate parking management will benefit from the improvements delivered by the Parking Transformation Programme including new IT systems, online offers and resource management.

Income generated by permits issued on housing land, and the costs of setting up and managing the scheme must be accounted for within the Housing Revenue Account (HRA) charges. Income generated from enforcement activities and the costs of enforcement are accounted for within the Parking and Highways Budget within the General Fund.

The financial assessment presented in Appendix 2 indicates that income generated by permit sales will be accounted for in the HRA and PCN income will be accounted for in the Parking and Highways Budget, within the General Fund.

Following Cabinet approval of the EPMS in the 2020 Report, presented as Appendix 5, a number of wider changes have taken place which necessitate a review of what the EPMS will deliver, and how the EPMS scheme designs will be determined.

Housing provision previously delivered through Homes for Haringey has now been brought back into the Council. Delivering housing provision through the Council provides an opportunity to better align housing and related services with delivery through one organisation. This includes how parking services and estate parking schemes are designed and delivered.

As part of this transition, the Haringey Deal launched in November 2022

provides an opportunity to reshape how residents are involved in the specifics of EPMS scheme design on their estate. Engagement with residents feeding back to a scheme design will result in a more effective and sustainable service – ensuring schemes better meet the needs and priorities of estate residents.

As the proposal includes changes to parking which affect practice or policy regarding housing management and the provision of services or amenities to Council tenants, consultation will seek the views of all affected estate residents including secure tenants, non-secure tenants and leaseholders in compliance with S105 of the Housing Act 1985.

A further wider change is the implementation in 2021 of the new Taranto parking management IT system, upgraded in November 2023. To ensure there is consistency firstly in permit offer, and secondly in the customer journey to apply for and manage permits, there are some amendments required to specific aspects of the original EPMS permit proposal.

In addition, existing measures will be retained to protect vulnerable groups such as the disabled and elderly to ensure that they have access to a free estate parking permit and to align the scheme with the Disabled Parking Place Policy as used by the CPZ Parking Scheme. The proposal includes measures to tackle the climate emergency by financially incentivising households to consider the number of vehicles they own.

Alternative options considered

Alternative options to the proposed new EPMS have been considered. These follow from changes in circumstance since the 2020 Report, including the insourcing of the Council's housing stock from Homes for Haringey into Haringey Council.

- **Do Nothing:** this option was discarded as effective parking management is needed to control parking arrangement on estates, particularly where there is high demand for parking space, low availability of parking spaces and/or issues with non-residents taking up parking space, such as displacement from nearby CPZs or demand from events.

- **Keep existing estate parking arrangements:** this option was discarded as the existing arrangements are difficult to enforce, ineffective, and do not meet the needs of residents or the political and financial objectives of Haringey Council.

- **Provide traffic management orders for existing scheme arrangements:** This option would have transferred the current arrangements as is to the Haringey Council Parking Enforcement Team. This was discarded as permits would remain free of charge with no mechanism to recoup the cost of implementation including required consultation and provision of new signage. The current permits also do not align with the existing on-street CPZ offer resulting in different customer journeys for residents of estates and other Haringey residents.

- **Introduce the scheme as originally set out in the 2020 Cabinet Report:** this was discarded as changes to Council policy, such as the Haringey Deal, needed to be included in the approach to resident engagement for the new scheme (see below for the options considered for resident engagement). Costs of these measures and to introduce the scheme also needed to be reviewed.

5.2 Alternative options for resident engagement have been considered:

- **Continue with the previously approved engagement approach:** the previous approach incorporated a pre-defined structure and content, with limited scope for residents to shape the process. In revising the proposed approach for resident engagement, it is recognised that housing insourcing brings it within scope of the Council's Haringey Deal approach – meaning a co-design approach should be taken to fully engage residents throughout the process.

A range of options have been considered regarding the most appropriate and effective permit proposal for estate parking. These include the following specific considerations:

- **Continue previously approved permit proposal:** the option to continue the previous permit proposal as approved in 2020 has been impacted by 2 key changes since approval. Firstly, the insourcing of Homes for Haringey in 2022 and, secondly, the introduction of a new parking management IT system in 2021. Each of these factors affects the validity of the previously approved proposal. Firstly, having a different permit offer (in terms of permits offered and associated application customer journeys) is not reflective of a cohesive, unified organisation. Secondly, some specifics of the original permit proposal would not have been deliverable within the new parking management IT system without system development. For these reasons and others noted above, the original proposal is not being pursued.

- **Closest alignment to CPZ permits:** In aligning the permit proposal to CPZ provision, a balanced approach has been taken, accounting for estate parking and residents. An alternative approach would be to fully mirror the CPZ permit offer and pricing structure (albeit with reduced charges overall): this would include, for example, applying charges to resident permits to include a base charge plus surcharges (for second and subsequent vehicles and diesel surcharges).

- **Higher limit for (or unlimited) estate resident permits:** the proposal of the limit of one estate resident permit per household recognises the parking pressures on estates and allows each household a fairer chance of being able to park on their estate, while also contributing toward carbon reduction by encouraging use of alternate modes of transport and/or lower emitting vehicles. An alternative would be to have a higher limit – or no limit at all – on estate resident permits per household, thereby introducing potentially higher pressure on estate parking with reduced fairness.

- **Variations of assumed permit demand:** it is not possible to definitively

know the behavioural impact of the introduction of a charged permit scheme – i.e., how many of the current free permits will translate into future charged permits. In permit income modelling underlying the financial model (Appendix 2), a conservative approach has been taken – assuming a 30% reduction in the number of permits issued (applied to all permit types where there is a known current volume). It may be the case that greater demand is realised following implementation – with this increased revenue improving HRA income.

• **Adopt CPZ costs for Estate Resident Parking Permits with no discount:** the proposed limit of one permit per household and limitations on the availability of parking space on the estates mean that residents may also need to buy CPZ permits to park. The proposal to offer Estate Resident Parking Permits at a discounted rate mitigates the cost impact of this to residents.

64. HOUSING ANNUAL REPORT 2022-23

(Cllr Arkell returned to the room at 6.46pm)

The Cabinet Member for Housing Services, Private Renters and Planning, introduced the Housing Annual report 2022- 23 which the Council were obliged to produce by the Housing Regulator.

The Cabinet Member outlined that the Annual Report for 2022-23 provided a retrospective view of performance since the Council brought housing services back in house, and progress against commitments to improve it. It described progress in respect of compliance with fire and electrical safety standards; the support the Council had provided to tenants through the cost-of-living crisis; and involvement of residents in the key decisions along with the improvement journey.

The Cabinet Member expressed that there were still significant challenges, and it was important that the Council were open and transparent about these. There was more to do to tackle the repairs backlog; damp and mould issues and boost tenant satisfaction and the Council were determined to improve in these areas in the coming year.

In response to questions from Cllr da Costa, the following was noted.

- The Cabinet Member was aware of the incoming new statutory requirements for emergency repairs in 24 hours, 7 days for other repairs and damp and mould inspections in 14 days and the Council would respond to the government requirements The Assistant Director for Operational Housing and Buildings added that the Council were already working to these timescales and already working to complete emergency repairs within 24 hours . Also within the Housing Improvement Plan there was a particular action to launch a new category to do repairs in five days rather than the seven days as stipulated by the government. With regards to damp and mould, the Cabinet had already agreed a policy which required inspection of reports of damp and mould in properties within 14 days.

- On addressing tenant dissatisfaction with the repairs service, this was a retrospective report and there were measures to improve tenant satisfaction. There was confidence that this would improve as the new tenant boards and engagement activities continued.

- Page 11 of the annual report indicated that resident involvement over the last year had generated over £2million in social value and the Assistant Director for Operational Housing would provide Cllr da Costa with a written response on how this had been calculated.

- The service had implemented a number of changes to improve the culture, with new management within the service, increasing visibility of housing officers, introducing new performance matrix and having a new governance in place as well.

RESOLVED
To note and approve the Housing Annual Report 2022-23 attached as Appendix 1 so that it can be made available to tenants and leaseholders on the Council's website.

Reasons for decision
It is essential that the Council is transparent about the landlord services it provides to tenants and leaseholders; explains the work it is doing to improve its services; and how it is spending the money it receives from tenants' rents.

Alternative options considered
As a social landlord, we are obliged to produce an Annual Report by the Housing Regulator so an alternative option was not considered

65. DETERMINATION OF THE COUNCIL TAX PREMIUM PAYABLE IN RESPECT OF PROPERTIES OCCUPIED PERIODICALLY

The Cabinet Member for Finance and Local Investment introduced the report which set out a proposed increase in Council Tax charge for dwellings which are substantially furnished and have no resident (which are colloquially known as "second homes"). It was proposed that a 100% premium should apply in such circumstances.

In response to questions from Cllr Hakata and Cllr da Costa, the following information was provided:

- In relation to the threshold for assessing if a second home, this did not have to be a year and could be a lower period where there were reasons to understand that the properties were being let or the properties were left open for periods of time without anybody living in them. This proposal only came into effect in the next year and would provide some time to acquire the required market information in the course of this year.

- For properties that were between lets and whether these would be liable for the 100% extra just for the period they were vacant, this policy would not affect a property where there was nobody living there. Also, if it was not furnished it would be dealt with in the empty dwellings policy also on the agenda.

- The Director for Finance clarified that the Council were expecting £900k income and that additional income was not hypothecated.

RESOLVED

To recommends to Full Council that it determines that –

1. For any dwelling within the area of the Council if, on any day, there is no resident of that dwelling and it is substantially furnished, the following shall apply:

i. the discount in s11(2)(a) of the Local Government and Finance Act 1992 (LGFA) shall not apply to that dwelling; and
ii. the amount of council tax payable in respect of that dwelling and that day shall be increased by 100 percent.

Reasons for decision

Council Tax legislation changed allowing councils to charge a premium of up to 100% on dwellings where there is no resident, and it is substantially furnished.

Applying the 100% premium has the potential to bring additional income which would help lessen the councils funding pressures in 2025.

An increased premium may encourage those using properties in the borough as second homes to relinquish them thus becoming available to those who live in the borough on a permanent basis.

Due consideration has been given to circumstances where the reason a dwelling is empty and furnished is because it is between lets. However, the new legislation does not provide for any interim period (e.g., a two-week grace period) before the premium is applied and instead, it applies with immediate effect. Charging the premium in this type of scenario would likely incentivise the properties to be brought back into use as soon as practicable.

The Council will continue to have the means to reduce or remove Council Tax liability under section 13A (1)(c) of the Local Government Finance Act 1992 (e.g., cases where there is exceptional hardship).

Alternative options considered

Not applying the premium or applying it a lesser percentage

The Council could choose not to apply the premium, or to apply the premium at an amount less than 100%.

This is not proposed because the Council is under significant financial pressure to deliver a sustainable Medium Term Financial Strategy. Applying

the Council Tax premium at 100% would likely generate additional income for the Council.

In addition, increasing the premium to the maximum 100% may encourage residents to bring such properties (whether used as a second home or otherwise) back into permanent residential use which could in turn lead to an increase in available housing.

66. DETERMINATION OF THE LENGTH OF TIME ALLOWED BEFORE A COUNCIL TAX PREMIUM IS PAYABLE IN RESPECT OF EMPTY PROPERTIES

The Cabinet Member for Finance and Local Investment introduced the report which set out the proposed reduction in time that a property can remain empty before the premium on Council Tax is charged on long-term empty dwellings.

The additional 100% council tax charge on properties that have been empty for more than one year was designed to encourage owners to act with urgency and ensure that empty buildings are brought into use in a timely manner.

In response to questions from Cllr Arkell and Cllr Hakata, the following was noted:

- This was one of the policies and powers that the Council was using to bring empty homes back into use. Where properties were empty for a considerable period of time, there was legal intervention undertaken to take possession of those properties. This was more of a complicated process but still taken forward, in line with the Council commitment to bring as much housing into use for families as possible.
- It was estimated that in London there were about 34,000 long term empty dwellings, and in Haringey probably more than 1000. The proposed new policy reduced the timescale from two years empty dwelling to one-year empty dwelling and would enable more properties to fall into this category, meaning more ability to take action.
- The Council Tax team were developing a mechanism so that residents can report empty properties through the website and officers would work with communications team on publicity to make sure people are aware of that.

RESOLVED

To recommend to Full Council that –

1. With effect from 1 April 2024, that a determination be made that a premium shall be applied to long term empty dwellings as defined in s11B(8) of Local Government Finance Act (LGFA) 1992 (as amended from time to time), and that the amount of council tax payable in respect of that dwelling and that day shall be increased by 100 percent.

2. That a determination be made that, if on any day a dwelling is a long-term empty dwelling, the discount in s11(2)(a) of LGFA shall not apply to that dwelling.

3. Notes that until 1 April 2024, the decision made by Full Council in January

2019 in relation to the premium payable in respect of long-term empty dwellings, shall continue in full force and effect.

4. Notes that the premium shall not apply to dwellings that are exempt under Regulations 9 and 10 of the Council Tax (Prescribed Classes of Dwellings) (England) Regulations 2003.

Reasons for decision

In January 2019 full council agreed to increase the premium charged on longterm empty dwellings from 50% to 100% from 1 April 2019.

At that point, a dwelling was defined as a “long-term empty dwelling” if for a continuous period of at least 2 years ending with that day it had been unoccupied, and substantially unfurnished.

With effect from 1 April 2024, the definition of long-term empty dwelling in s.11B(8) LGFA has been amended by section 79 of the Levelling-up and Regeneration Act 2023 to substitute “1 year” for the previous “2 years”.

As the definition in the legislation has changed, the Council is making a new determination to clarify that the new time period applies.

Alternative options considered

The Council has considered not making a new determination but considers that, for the avoidance of doubt, the Council should make it clear that, from 1 April 2024, the premium shall apply to dwellings that are empty for at least 1 year in line with the changed legislation.

The Council could choose to remove or reduce the existing premium.

This is not proposed because the Council is under significant financial pressure to deliver a sustainable Medium Term Financial Strategy. Removing or reducing the Council Tax premium would reduce the Council’s income.

In addition, removing or reducing the premium may reduce the incentive for residents to bring long-term empty properties back into use.

67. REPORT ON THE OUTCOME OF STATUTORY CONSULTATION ON PROPOSED CHANGES TO THE ESSENTIAL SERVICE PERMIT SCHEME

The Cabinet Member for Cabinet Member for Resident Services & Tackling Inequality introduced the report which sought approval to implement changes to the Essential Service Permit scheme following the outcome of statutory consultation.

The Cabinet Member explained that the report and proposed decision acknowledges that there were services that operate in the borough that require vehicle access such social workers who do home visits or community-based services such as religious leaders who visit residents to give last rights.

The Council had conducted a review on the ESP's both in line with transport policies, but also to tighten up a very manual process.

The Cabinet Member highlighted the positive changes including new charges, for diesel surcharge to bring this permit in line with all other parking charges. Also, introducing Essential Service Permits to foster carers for the first time, following extensive co production work with children's social services.

The Council were also introducing team permits with staff, so that staff did not have an individual annual permit for a specific car but received visitors permits instead.

In response to a question from Cllr da Costa regarding which services retain vehicle specific permits and the provision that will be made for this in the revised operational policy, it was noted that the aim was not to have a rigid policy that becomes unworkable in the future, and, at the moment, there was not a specific team in question. However, this could apply to teams that need that vehicle access every day such as civil enforcement officers.

RESOLVED

1. To consider all feedback including objections to the proposed order, given during the 2023 consultation, as set out in Appendix 4 of this report.
2. that the Council shall exercise its discretion to not cause a public inquiry to be called.
3. That an allocation of 20 parking permits be issued to schools annually at a flat fee of £200 each, with an additional 10 available subject to a surcharge of £100 each.
4. That Essential Service Permits issued to Council staff being transferable ('Team') permits, with provision retained for vehicle specific permits on a needs basis.
5. That access for regulated foster carers with children up to the age of 15 years to the subsidised ESP scheme.
6. To agree the change to charges as proposed in Appendix 1.
7. To agree the delegation of authority to the Head of Highways and Parking to take all consequent steps necessary to implement the proposed measures in recommendations 3 to 6 above.

Reasons for decision.

This scheme allows those delivering essential services to residents to park in controlled parking zones (CPZs). Schools can also access the scheme which is required to support recruitment and retention as well as the efficient operation of the school. The scheme is reviewed periodically to ensure that it remains aligned with the Councils wider transport policies.

This review sought to address residents' concerns about the impact of ESP holders parking on busy roads, without compromising the benefit of the scheme to users. The recommendations in paragraph 3.1 of this report also address the concerns raised by users in particular schools (who need more flexibility to support their wider recruitment and retention challenges) and registered foster carers (who have expressed a need

for free or subsidised parking to support them when taking children to appointments). Allowing foster carers to obtain permits under the ESP scheme at the subsided charge is considered reasonable considering the many appointments carers are required to attend when fostering.

Alternative options considered.
Retaining current arrangements was considered. This would fail to address the dissatisfaction with the scheme. It would also prevent foster carers accessing the scheme.

Consideration was given to excluding schools from the ESP scheme. Those permits are mainly used by teaching staff to commute to work.

There are growing concerns about transport-related pollution and its impact on air quality near schools. The Council has implemented 23 School Streets to address the growing concerns about transport-related air pollution around schools and the impact on children's health. ESPs for schools inevitably contribute to traffic and congestion and the associated impact on air quality.

While some schools have car parks, others do not and distance from public transport hubs can make it difficult to carry materials or equipment. Those schools therefore feel that parking permits are an important aid to recruitment and retention. The Council aims to support the efficient running of those schools.

Consideration was given to implementing a 2-hour time limit for each ESP parking session. This was considered to minimise the impact of ESP parking on busy roads preventing extended or all-day parking. This would not meet the needs of all users, especially those involved in safeguarding.

68. CONTRACT AWARD FOR THE NEW CAPACITY BUILDING PARTNER FOR THE VOLUNTARY AND COMMUNITY SECTOR

The Cabinet Member for Culture, Communities & Leisure introduced the report which detailed the outcome of an open tender process and sought approval to award the contract to the successful tenderer for the Provision of Capacity Building Partner for the Voluntary and Community Sector (VCS) in Haringey in accordance with Contract Standing Order (CSO) 9.07.1 (d).

The Cabinet Member highlighted the following:

- The voluntary and charitable sector in Haringey played a vital role across the borough, supporting residents and providing services to different communities and the Council were committed to supporting the sector and to support a provider to provide advice and support.

- The Council had redesigned the service specification to better meet the needs of the sector, and this had been informed through engagement with that sector.

- The contract focused more strongly on capacity building and set out clear and transparent accountability to both the Council and the wider sector, ensuring equitable access to support and external funding opportunities.

- The Council had carried out a robust and thorough open tender process toward a new contract to a provider who submitted a strong bid outlining their experience, expertise and commitment to providing services required and the outcomes specified in the tender documents.

- Delivery against the contract will be regularly monitored, monitored on a quarterly basis to ensure key performance indicators were met and service outcomes were delivered.

- Agreement was being sought to award this contract for three years starting on the 1st of April 2024.

In response to questions from Cllr da Costa, the following information was provided.

- The Council were looking for a provider in a niche market as there were few organisations that are able to meet the contract specification. However, out of the organisations that did tender for this bid, they had set out some really strong outcomes that the Council want to deliver and to support the voluntary sector across Haringey in the future.

- Regarding making contract monitoring performance publicly available, the Council would be working with the provider to develop a clear suite of public reporting indicators. The Council wanted the successful winning bidder partner to work with the voluntary sector to agree what the sector feels are the important outcomes that really mattered to them and then to agree what the mechanism of reporting and transparency would be. Therefore, the intention was to develop the performance indicators with the sector and with the partner once appointed.

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Further to considering exempt information at item 19,

RESOLVED

1. To approve the award of a contract to the successful tenderer, for the Provision of Capacity Building Partner for the Voluntary and Community Sector, in accordance with Contract Standing Order (CSO) 9.07.1(d). The successful bidder is identified under Appendix 1 - Part B (exempt information) of this report).

2. To approve the contract award for a period of three (3) years, commencing 1st April 2024 to 31st March 2027, with option to extend for further periods of up to plus 2 years.

3. To note that there is the potential for additional investment from North Central London Integrated Care Board (NCL ICB). Any additional activities to be delivered as a result of this funding will be agreed with the provider by way of variation to the contract.

4. To note that the Director of Culture, Strategy and Engagement will approve any variation of contract resulting from any additional NCL ICB funding as stated above.

Reasons for decision

The Council is committed as part of the Haringey Deal to working more closely with residents, understanding the specific needs of different communities in more depth and granularity, and getting better at listening to voices that are often overlooked. The voluntary and community sector is a key partner in realising this ambition and as a Council we need to support the development and growth of the sector so that it effectively represents and supports all of our diverse communities.

Further support for and development of partnership working with the voluntary and community sector in the borough is therefore a key strategic priority for the Council and is incorporated throughout the Corporate Delivery Plan 2022 - 2024.

The current VCS strategic partner contract was originally let some years ago and does not reflect current Council priorities and ways of working under the Haringey Deal. The specification has therefore been re-designed. The redesign of the new service was informed through engagement with the VCS,
focused more strongly on capacity building and with clear and transparent accountability to both the Council and the wider sector, ensuring equitable access to support and external funding opportunities. The service specification reflects that the new service should be innovative, responsive, flexible, and more strategically aligned as a VCS Capacity Building Partner service in Haringey.

The decision to award a contract to the successful tenderer is based on the conclusion of a competitive procurement process and is made according to the outcome of the Most Economically Advantageous Tender.

Alternative options considered.

Do Nothing - The Council could elect not to commission this service.
However, it has been concluded given the Council's strategic objective to develop support for the voluntary and community sector, to no longer commission the service would have an adverse impact on delivery of strategic outcomes as well as on those organisations in the sector and therefore on the many small organisations who they support. The option to do nothing was considered and rejected.

In-house – This provision was considered and found not to be suitable for full delivery of this service. There is a need for an independent partner to provide representation to the sector, which already works collaboratively with the Council's dedicated Voluntary & Community Sector Team. The need for a

partner from within the VCS was expressed clearly in the engagement with the sector that informed this decision.

Extend existing contracts – Extension periods available within the existing contract have been exhausted and in addition the specification set out in the existing contract does not now match the Council's and sector's priorities.

69. MINUTES OF OTHER BODIES

RESOLVED

To note the following minutes:

Cabinet Member Signing
30 November 2023 10am
30th November 2023 1.30pm
4 December 2023
5 December 2023
7 December 2023 2pm
7 December 2023 3.30pm
12 December 1.30pm

70. SIGNIFICANT AND DELEGATED ACTIONS

To note the significant and delegated actions taken forward by Directors.

71. NEW ITEMS OF URGENT BUSINESS

None

72. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED
That the press and public be excluded from the remainder of the meeting as items 16 to 17 contain exempt information as defined under paragraphs 3 and 5, Part 1, Schedule 12A of the Local Government Act 1972:

Information relating to the financial or business affairs of any particular person (including the authority holding that information).

Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings

73. EXEMPT CONTRACT AWARD FOR THE NEW CAPACITY BUILDING PARTNER FOR THE VOLUNTARY AND COMMUNITY SECTOR

The exempt information was considered and recommendations approved as set out above.

74. EXEMPT - MINUTES

RESOLVED

To approve the exempt minutes of the meeting held on the 5th of December 2023.

75. NEW ITEMS OF EXEMPT URGENT BUSINESS

None

CHAIR: Councillor Peray Ahmet

Signed by Chair ……..

Date ……

Report for: **Cabinet 6 February 2024**

Title: **Final 2024-25 Budget and 2024-29 Medium Term Financial Strategy**

Report authorised by : **Jon Warlow, Director of Finance**

Lead Officer: **Frances Palopoli, Head of Corporate Financial Strategy & Monitoring**

Ward(s) affected: **All**

Report for Key/ Non Key Decision: **Key**

1. **Describe the issue under consideration**

1.1. This report sets out details of the final proposed General Fund (GF) Budget for 2024/25; the Medium Term Financial Strategy (MTFS) 2024/29; the HRA Budget 2024/25 and its Financial Plan, as well as the capital programmes for both funds. It also includes proposed dedicated schools budgets for 2024/25.

General Fund Revenue Budget

1.2. As Members will know, the financial situation for local authorities is as difficult at this time as perhaps it has ever been, as evidenced by the increasing number of authorities who are needing, or near to issuing, a Section 114 statement regarding their inability to set a legal budget. This has been the backdrop to our budgetary process for the 2024/25 year.

1.3. With a £16.3m budget gap in the December Draft General Fund Budget, considerable further work has been undertaken to identify additional savings and actions to close the gap. Consequently, the budget position has improved by c.£10.4m since December, requiring the Council drawdown of £5.9m from the Strategic Budget Planning Reserves in order to set a balanced budget for 2024/25. The main changes are briefly summarised in this section below.

1.4. The primary reason for the December gap was the need for growth in Directorate budgets. This was predominately in the three demand led services with £25.5m growth being built into this Budget solely for these, namely: £20.4m for Adult social care; £3.0m for Temporary Accommodation and £2.1m for Children's.

1.1. The Provisional Local Government Finance Settlement (PLGFS) was announced on 18th December and has proposed a 6% increase in Core

Spending Power (CSP) in 2024/25 for Haringey, below the national average of 6.5% costing us £1.5m a year compared to the national average. CSP measures the core revenue funding available for local authorities and includes assumptions around Council Tax and locally retained business rates and allocations for Revenue Support Grant and other core grants such as New Homes Bonus and Social Care Grants.

1.2. The CSP figures assume that local authorities will apply the full Council Tax and Adults Social Care (ASC) precept increases which the PLGFS confirmed as 2.99% for Council Tax and 2% for ASC (this total increase was assumed in our December Budget). This 2024/25 Budget continues to recommend that both increases are adopted.

1.3. The overall funding announced for Haringey in the PLGFS is £3.7m worse than assumed in the Draft December Budget. This is due to £2.7m less than assumed for the Services Grant, £2.3m notional deterioration in Business Rates related funding, £0.2m deterioration in the New Homes Bonus and £1.3m more than assumed for the Adults Market Sustainability & Improvement Fund and Social Care Grant. Grant allocations still to be announced include Public Health Grant and the Homelessness Prevention Grant. As yet the government has not announced any future Household Support Fund (HSF). The current year's Haringey HSF allocation is £4.8m and if this does not continue for 2024/25, will result in further loss in vital government funding.

1.4. This year's provisional settlement follows the details provided at the Autumn Statement 2023 and the Policy Statement on 5th December 2023. The PLGFS only provides funding allocations for the single financial year 2024/25. This information has been used to model the 2024/25 assumptions for Haringey. Beyond that year, most grant funding is assumed as cash flat.

1.5. On 24 January 2024, the Government announced an increase in funding for 2024/25 over and above that included in the PLGFS. The largest sum is £500m for authorities with social care responsibilities and will be distributed via the social care grant. Although the actual additionality for Haringey will not be confirmed until the publication of the final settlement, the sector as a whole assumes the allocation methodology will follow that previously used. A late adjustment has been made to this Budget report to build in an assumed additional £2.0m of social care grant which will offset the significant growth that the Council has had to build into the social care budgets for 2024/25. We have also allocated the additional £1.3m increased market sustainability and social care grant funding in full to Adults social care and reflected the impact of the reduced Services grant on the overall budget position.

1.1. Modelling was undertaken during September which showed that the continuation to participate in the 8 Borough business rate pool for 2024/25 is beneficial and as such £2m additional income was assumed in December. This is still a sound assumption, and the decision has now been formally ratified by the Director of Finance following consultation with the Lead Member for Finance.

1.2. Since the last report, and subject to the approval of Full Council, there have been some improvements to the Council Tax assumptions: £0.9m from the impact of applying Premium on Empty Homes, £0.8m from an increased council taxbase and a one-off from the estimated 2023/24 surplus.

1.3. Additionally, further due diligence has been undertaken against key corporate budgets such as pay, general inflation, treasury, borrowing and the main contingency budgets. Even though this is normal practice, given the financial challenges we face and the current economic volatility this has assumed greater importance. We have improved forecasts in interest received, Concessionary fares and non-pay inflation. The Capital programme was reviewed for options for further reductions resulting in minimal changes and we revisited the North London Waste Authority (NWLA) levy assumptions, which are now higher compared to the December Draft Budget.

1.4. Turning now to the extensive further work undertaken since December on service and directorate budgets. Following receipt of the most up to date in-year forecasts and improved confidence in the impact of mitigation to reduce known pressures, growth assumptions for 2024/25 in Social Care and Temporary Accommodation were also revisited.

1.5. Through an extensive and collaborative exercise across the council, additional directorate savings and management actions of £4.7m in 2024/25 have been identified since the December Draft Budget, rising to an additional £13.0m over the course of the MTFS. There is also an estimated £3.5m improvement of budgeted client contributions in Adult Social Care Services, of which a total £0.250m of that income will be earmarked for two years to deliver the Adults Debt Recovery project. There has also been additional unavoidable corporate growth of £0.715m, predominately due to card fees on bank charges and increased external audit fees and it should be noted that all the previously described growth in the December Draft Budget continues to form part of this final Budget.

1.6. The Budget and MTFS now presented also take due regard of the consultation feedback, recommendations from the Council's Overview and Scrutiny Committee and the results of the Equalities Impact Assessment. All budget changes made in total since December have improved the overall budget position by c.£10.4m since December. To enable the Council to set a balanced budget for 2024/25 there will be a drawdown of £5.9m from the Strategic Budget Planning Reserves.

1.7. In accordance with the Local Government Finance Act (LGFA) 1992, Full Council must approve the Budget for the forthcoming year and agree council tax for that year by the statutory deadline of 11th March. This report forms a key part of this budget setting process by setting out the planned funding and expenditure for that year. Cabinet's role in this is to recommend the Budget and key policy proposals to Full Council for agreement and this report

satisfies this duty. Full Council will consider the Budget package contained in this report at their meeting on 4th March 2024.

1.8. In order to ensure the Council's finances over the medium term are built on a sound basis, the Council always maintains a five –year future forecast of its finances via its MTFS. The 2024/25 Budget has significant growth allocated to care service budgets (mainly Adults) and addresses the assumed demand in care services, underpinned by a significant savings programme and use of £5.9m reserves. Similarly, to previous years, there has been limited progress to address the structural budget gap which is forecast to reach c£28m by 2026/27 (Given the degree of economic and future funding uncertainties, our projections beyond this point were not able to be soundly modelled). The gap for 2025/26 is £16.9m alone.

1.9. This has been a tough budget round for the Council, as is self evident by the need for an extensive second round since December. Looking forward to 2025/26, our forecast gap of £16.9m is greater than it has been for Year 2 of our MTFS (last year it was £6.3m). Given the value of savings that the Council has already made since 2010, next year must represent the most challenging financial position yet for the Council. This is exacerbated by lack of certainty about its funding levels and cost and demand increases, a situation shared with many other authorities. The Council will need to commence its next stage of financial and savings planning early in this new year (as indeed it normally does) and continue to monitor this situation closely. Without the necessary increase in funding from government and given our reducing reserves, the Council's future financial position looks very difficult.

1.10. The Council must therefore continue to focus on delivering its agreed programme of savings which are vital in helping the ongoing financial sustainability of the authority in the longer term.

Capital

1.11. Our capital programme provides important opportunities to address our communities' needs, however the Council's finances are tightly constrained, and so affordability is a key consideration.

1.12. Investment in capital expenditure can support the Council to deliver on key priorities and can support the delivery of permanent revenue savings. However, in the current financial climate, it is more important than ever that the Council ensures that all of its capital expenditure, investments and borrowing decisions are prudent and sustainable.

1.13. The current economic environment has also had major implications for the existing and future GF Capital Programme. Borrowing costs have increased and inflation has impacted the cost of raw materials and the tightness in the supply chain for capital works (labour and materials) has added both cost and time to schemes.

1.14. In response, the Council has undertaken a fundamental review of the existing capital programme, removing or deferring a number of schemes. A robust approach has been taken to the inclusion of any new proposed investment.

1.15. Given the extent of the financial challenge still facing the authority and following further review of the Capital Programme since December, there has been a further £28.7m proposed budget reduction across schemes from the Children's and Young People's Services (CYPS), Environment and Resident Experience (ERE) and Placemaking and Housing Directorates over the MTFS period. These changes continue to put the Capital Programme on a more affordable footing. These proposed further reductions to the Capital Programme will be kept under review and reconsidered as part of the future MTFS processes to ensure the Council is able to continue to meet their statutory duties and protect the most vital services to residents.

1.16. The impact of this rigour can be seen when comparing the latest capital programme projection to 2027/28 (£583m) with that agreed in March 2023 (£1,008m), a reduction of £425m.

HRA

1.17. The prevailing economic situation is also forecast to impact on the current HRA financial plan with increases in energy costs, inflation and interest rate rises presenting a level of challenge and difficulty in delivering the capital programmes now and the viability of our HRA in the medium to long-term.

1.18. To be able to invest in the management and maintenance of our homes and maintain the long-term sustainability of the HRA, the Council has reviewed its charges to tenants.

1.19. The proposed Plans now presented, despite the forecasted challenges, maintain an adequate annual surplus (though decreased in future years), providing an appropriate level of in-year financial cover.

1.20. The new HRA capital plan places a strong emphasis on meeting the needs of the existing tenants and addressing the condition of the existing stock. It also focuses on the delivery of new homes, renewal of the Broadwater Farm ("BWF") estate, carbon reduction in existing stock, and fire safety of the entire stock. Capital investment for 2024/25 alone is £239m and is geared towards maximising the use of other available resources and use of borrowing as last resort.

Dedicated Schools Budget

1.21. Since the proposed budget shared in December, national figures for 2024/25 schools have been announced. Overall, Haringey's National Funding Formula (NFF) allocation for 2024/25 is an increase of 8.6% excluding rolled in grants equivalent to £7.12m. This is based on the December 2023 published allocations, with the final school finance settlement confirmed usually in July 2024 for the updated Early Years Block census.

Conclusion

1.22. In summary, this report finalises the Council's General Fund and HRA 2024/25 Budgets and Medium-Term Strategies for 2024/2029.

1.23. The only items not confirmed at this stage are:

- Notification of final levy sums however, we are not forecasting any levies to be significantly different to the sums budgeted for;
- Confirmation of the GLA council tax element;
- Final 2024/25 Local Government Finance Settlement (LGFS) announcement and any other late notifications from government departments.

1.24. Due to the very recently received announcement of additional funding from Government for 2024/25, there could be more budget adjustments post the publication of this report than in prior years. A full update and an assessment of the implications for Haringey, including any final required adjustments, will be included in the Full Council report on 4th March.

2. **Cabinet Member Introduction**

2.1. We have recently estimated that over the past 14 years of government austerity, real terms funding for our borough has been reduced by c.£143 million compared to 2010/11 levels. Haringey is among the boroughs with the highest levels of deprivation in London, with corresponding higher need for social care and other services. Rising need and high inflation are driving up what we must spend on statutory services. We have always been clear that if government is unwilling to step up for the people of Haringey, we will do so.

2.2. Haringey Council is ambitious for our borough's future. Our council house building programme remains on track, and we will deliver our key commitment of 3000 new Council homes by 2031. This investment will make a real difference to local people; affordable, high-quality, modern, eco-friendly homes will support families out of temporary accommodation and homelessness. We will continue to pursue our climate and air quality goals; creating more school streets and increasing tree planting; making our homes climate-change proof through retrofitting and smart design; and encouraging active travel through installing more cycle lanes and bike hangars. Pollution is generally higher in lower income areas. Poorly insulated homes hit the pockets of people on lower incomes hardest. Travel by foot or bike or bus is the most affordable way to get around – and most people in low income neighbourhoods don't own a car. Climate justice is social justice – and this administration's commitment to building a fairer, greener Haringey remains at the heart of all our decision making.

2.3. I would like to extend my thanks to all the residents who participated in the budget consultation, whose feedback shaped our thinking and approach. I'm grateful to the Council officers who, through their hard work identifying efficiencies, have helped us once again set a balanced budget this year. After 14 years of austerity, every year of funding cuts compound to make each budget round more demanding than the last.

2.4. As a Council, we are focused on delivering value for money by continuing to drive down spending on agency staff, consultants, and senior managers. Local authorities across the political spectrum have campaigned for government to provide fairer funding, in response the government has called on councils with budget shortfalls to use their reserves to fill the gap. This is not a sustainable long-term solution. Reserves can only be spent once, so as a responsible local authority we have sought to minimise their use as much as possible. The government has notified an intention to increase funding via the Social Care Grant, which for Haringey amounts to just £2m this year. While any increase in funding is welcome, this is nowhere near enough to cover the increased cost of delivering adult social care, and does nothing to address future funding pressures.

2.5. Efficiency savings and the use of reserves have not been enough to address the overwhelming pressure on our budget, and some difficult decisions must be made. To set a balanced budget we must find savings in our services and be prudent about the affordability of borrowing. However, with the current available resources we will not be able to do everything we previously planned, and some projects will have to be delayed to a time when the cost of borrowing is lower. Despite all the challenges we will proudly continue to resource our fantastic libraries, children's centres, parks, leisure facilities, affordable homes, and youth services. This budget invests in the local services that our communities value and invests in Haringey's future as a fairer, greener borough.

3. Recommendations

Cabinet is asked to:

3.1 Consider the outcome of the budget consultation as set out in Appendix 7, to be included in the report to Council.

3.2 Approve the responses made to the Overview and Scrutiny Committee recommendations following their consideration of the draft budget proposals as set out in Appendix 8.

3.3 Propose approval to the Council of the 2024/25 Budget and MTFS 2024/29 Budget new growth and savings proposals as set out in appendices 2a, 2b 3a and 3b.

3.4 Propose approval to the Council of the 2024/25 General Fund Revenue Budget as set out in Appendix 1, including specifically a General Fund budget requirement of £279.305m, but subject to final decisions of the levying and precepting bodies and the final local government finance Settlement.

3.5 Propose approval to the Council of the General Fund Medium Term Financial Strategy (MTFS) 2024/2029 as set out in Appendix 1.

3.6 Propose approval to the Council that the overall Haringey element of Council Tax to be set by London Borough of Haringey for 2024/25 will be £1,635.92 per Band D property, which represents a 2.99% increase on the 2023/24 Haringey element and with an additional 2% for the Adult Social Care Precept amount.

3.7 Note the Council Tax Base of the London Borough of Haringey, as agreed by the Section 151 Officer under delegated authority (Article 4.01(b), Part 2, of the Constitution), as 81,875 for the financial year 2024/25 (Appendix 10).

3.8 Propose approval to the Council of the 2024/25 Housing Revenue Account budget as set out in Table 9.6.

3.9 Propose approval to the Council of the Housing Revenue Account Medium Term Financial Strategy (MTFS) 2024/2029 as set out in Table 9.6.

3.10 Approve the changes to the rent levels for residents in temporary accommodation, Council tenants in General Needs and Sheltered/Supported homes and shared ownership rents. Following compliance with the notification provisions contained in s103 Housing Act 1985, this will increase the average weekly rents as set out in Section 9.

3.11 Agree the changes to service charges to tenants as set out in Tables 9.4 and 9.5, which will come into effect following compliance with the notification provisions contained in s103 Housing Act 1985.

3.12 Propose approval to the Council of the 2024/25 – 2028/29 General Fund capital programme detailed in Appendix 4.

3.13 Propose approval to the Council of the 2024/25 – 2028/29 Housing Revenue Account (HRA) capital programme detailed in Table 9.7.

3.14 Propose approval to the Council of the Capital Strategy detailed in Section 8 of this report.

3.15 Propose approval to Council of the strategy on the use of flexible capital receipts to facilitate the delivery of efficiency savings including capitalisation of redundancy costs (Appendix 6).

3.16 Propose to the Council the Dedicated Schools Budget (DSB) allocations for 2024/25 of £234.04m as set out in Table 10.1.

3.17 Note the funding to be distributed to primary and secondary schools for 2024/25 based on the figures advised to Schools Forum and submitted to the Education Funding Agency in January 2023 set out in Section 10.

3.18 Note the budgets (including the use of brought forward DSG) for the Schools Block, Central Services Block, High Needs Block and Early Years Block set out in Table 10.1.

3.19 Delegate to the Director of Children Services, following consultation with the Cabinet Member for Children, Education and Families, authority to amend the Delegated Schools Budget to take account of any changes to Haringey's total schools funding allocation by the Education and Skills Funding Agency.

3.20 Delegate to the Section 151 officer, following consultation with the Cabinet Member for Finance, authority to make further changes to the 2024/25 budget proposals to Full Council up to a maximum limit of £1.0m.

4. Reasons for decision

4.1 The Council has a statutory obligation to set a balanced budget for 2024/25 and this report forms a key part of the budget setting process by setting out the final forecast funding and expenditure for that year. Additionally, in order to ensure the Council's finances for the medium term are maintained on a sound basis, this report also sets out the funding and expenditure assumptions for the following four years in the form of a Medium-Term Financial Strategy. The Budget/MTFS report will be presented to Full Council on 4 March 2024 for approval.

5. Alternative options considered

5.1 The Cabinet must consider how to deliver a balanced 2024-25 Budget and sustainable MTFS over the five-year period 2024-29, to be reviewed and ultimately adopted at the meeting of Full Council on 04 March 2024.

5.2 The Council has developed the proposals contained in this report in light of its current forecasts for future income levels and service demand. These take account of the Council's priorities; the extent of the estimated funding shortfall; the estimated impact of wider environmental factors such as inflation, interest rates, the cost of living crisis on households and, in some service areas, the legacy of the Covid-19 pandemic; and finally, the Council's overall financial position. It is this appraisal that has led to this report.

5.3 These final proposals now presented take into consideration the funding allocations announced in the Provisional Local Government Finance Settlement, the responses to the budget consultation and the initial Overview & Scrutiny process. There is not an option to do otherwise as the Council has a legal duty to set a balanced budget by 11 March each year.

6. Background information and Funding Assumptions

6.1 The Council has access to five main sources of funding:

- Business Rates
- Council Tax
- Grants
- Fees & Charges
- Reserves

6.2 Business Rates and Grant funding levels are largely driven by the outcome of Spending Reviews (SR), Budget Statements and the Local Government Finance Settlement (LGFS). There has been no SR this year.

6.3 The Autumn Budget Statement announced on 22 November 2023 provided updates on the state of public finances and the performance of the economy. Inflation was predicted to reach the government's target of 2% CPI by the second quarter 2025. The decrease is largely attributed to the following factors: lower wholesale energy prices; a fall in food and other goods inflation; and loosening of the labour market. Real household disposable income is not predicted to recover to pre-pandemic levels until 2027-28.

6.4 Announcements in the Autumn Statement directly relevant to local government include:

- There was **no new funding for 2024-25 for adult or children's social care or any general local government funding**, beyond what was announced last year.
- Resource Departmental Expenditure Limit (DEL) budgets will increase by 1.0% in real terms over the medium term to 2028-29, **implying real-terms cuts for unprotected departments like the Local Government DEL**.
- Local Housing Allowance rates will be raised to a level covering 30% of local market rents.
- Additional funding of £120m for homelessness prevention (UK-wide) in 2024-25 (details TBC).
- Local Authority Housing Fund to be extended with a third round worth £450m to deliver new housing units and temporary accommodation for Afghan refugees.
- For the Housing Revenue Account, there is a rate extension of £5m to June 2025 of the Public Works Loan Board policy margin announced in Spring 2023.
- There are plans to allow local authorities to be able to fully recover the cost of planning fees for major planning applications if decisions are made within certain timelines.
- Local Planning Authorities to receive £32m to tackle planning backlogs.
- Benefits will increase by 6.7% in 2024/25 in line with September inflation rate.
- The standard business rate multiplier will be increased by September CPI (6.7%) and the small business rate multiplier will be frozen for a fourth consecutive year. The 75% Retail, Hospitality and Leisure relief will be extended for 2024-25. Local authorities will be fully compensated for the loss of income because of these two measures.

6.5 The Government published a local government Policy statement on 5 December 2023. This largely confirmed announcements already made in the December 2022 Policy statement and confirmed that draft authority level

details to be provided in the PLGFS to be announced before parliament recess.

6.6 The **PLGFS for 2024/25** was announced on 18 December 2023 and again provided funding allocations for one year only. Much of the PLGFS is focused on **'Core Spending Power'** (CSP) which is a Government measure of the resources available to local authorities to fund service delivery. It includes the following:

- Revenue Support Grant (RSG) and notional Business rates (both income retained locally and the top up received from Government). These are collectively known as 'Settlement Funding Assessment' (SFA);
- Section 31 grants (estimated) in relation to business rates to compensate authorities for government decisions on business rate reliefs and holding the multiplier below inflation (under indexation);
- Council Tax Requirement – a calculated notional figure based on national taxbase growth levels and assumption that all authorities have and will apply the maximum council tax increase;
- Specific grants – including Social Care related grants, the New Homes Bonus and the Services grant *and*
- Adjustments for any rolled in grants and adjustments to deliver the 3% CSP funding guarantee.

6.7 **Core Spending Power (CSP) will increase by 6.5% across England and 6.4% for London boroughs** in 2024-25. **Haringey's CSP** will increase by only **6%.**

6.8 The Council Tax referendum threshold will remain at 3%. Eligible local authorities can set an adult social care precept of up to 2% without a referendum. This is in line with the assumptions included in the December Draft Budget report.

6.9 The PLGFS postponed any plans to reform its assessment of need and resources or to reset the business rates retention scheme until the next parliament (i.e. 2025-26 at the earliest).

6.10 The key implications for Haringey from the PLGFS are:

- £1.5m **more** than assumed for Social Care Grant and Market Sustainability & Improvement Fund.
- £2.7m **less** than assumed for Services Grant.
- £0.2m **deterioration** in assumptions on New Homes Bonus (NHB)
- Overall, a **£1m deterioration** in grant funding compared to the assumptions in the draft Budget report.
- A notional £2.3m deterioration in Business Rates related funding – final figure dependent on completion of key grant return (NNDR1) at the end of January 2024

- Grant allocations not announced in the PLGFS: Public Health Grant, Homelessness Prevention Grant, Schools Funding.

6.11 The PLGFS revised grant allocations have been incorporated into the 2024/25 Budget and 2024/2029 MTFS presented in this report.

6.12 On the 24 January 2024, the Secretary of State for Levelling Up, Housing and Communities published a written statement, announcing an increase in funding that will be reflected in the final 2024/25 local government finance settlement. This package includes:

- £500 million for social care authorities, aimed at children's social care and distributed through the social care grant;
- A £15 million increase to the rural services delivery grant;
- An increase in the minimum funding increase guarantee threshold from 3% to 4%;
- £3 million in support for local authorities experiencing significant difficulties due to internal drainage board levies, to be delivered outside of the settlement; and
- A specific funding uplift for the Isles of Scilly and the Isle of Wight (amount not specified).

6.13 Overall, the Government estimates that this package will amount to about £600 million in additional funding, with additional services grant funding making up the balance.

6.14 The final local authority level allocations will not be confirmed until the final local government finance settlement is published, which will be after the publication of this report. However, on the assumption that the £500 million social care grant uplift will be apportioned based on the standard adult social care relative needs formula, an additional £2m of Social Care Grant has been built into this final Budget reflecting Haringey's estimated share. This will obviously be used to offset the considerable growth that has had to be built into the social care budgets for 2024/25.

6.15 The final Budget report to Full Council on 4 March will reflect the impact of the **final** funding allocations.

6.16 In addition to the funding increases, the written statement also announced that all local authorities will have to produce productivity plans, setting out how they will 'improve service performance and reduce wasteful expenditure to ensure every area is making best use of taxpayers' money'.

6.17 The Government is aiming to require local authorities to produce these plans by the Parliamentary summer recess (late July) and will design a process for

local authorities to follow. The Government will provide more information on these requirements for local authorities at the final Settlement.

6.18 The Department for Levelling Up, Housing and Communities will be establishing an expert panel to advise the Government on financial sustainability in the sector which will include the Office for Local Government and the Local Government Association. The panel will review local authority productivity plans and advise the Government on best practice in this area.

Business Rates and Revenue Support Grant

6.19 When the new localised business rates system was introduced in 2013, it set a 'baseline' for each local authority against which growth could be measured. It was recognised that the baseline would need to be re-visited after a number of years to ensure that the incentive to grow businesses in local areas was maintained.

6.20 The intention was for business rates baselines to be reset from April 2020 however, both SR19 and SR20 confirmed annual delays. SR21 was silent on the reset, and it wasn't implemented for 2022/23. The Government progressed with a revaluation of business rates from 1 April 2023, but the reset did not take place. The 2024/25 PLGFS postponed any plans to reset the business rates retention scheme until the next parliament (i.e. 2025-26 at the earliest) and therefore, the Budget continues to assume a reset in 2025. This will be kept under review and amended as new announcements are received. However, as Haringey is a top up authority, even if this assumption proves incorrect, it is expected that a similar level of funding will accrue from a redistribution of business rates income in the form of additional/alternative grant.

6.21 Revenue Support Grant (RSG) and the amount provided to local government is just one part of the overall amount of funding determined during a Spending Review. However, for local authorities, since the introduction of the Business Rate Retention Scheme, Revenue Support Grant is the primary source of funding from central government and is calculated via the Settlement Funding Assessment (SFA) which consists of the local share of business rates, and Revenue Support Grant. The SFA is uprated year on year in line with the change in the small business multiplier which more recently has been based on the September CPI figure. This was 6.7% in September 2023 and the PLGFS confirmed this figure. Therefore, no change has been made to the RSG figure in this final 2024/25 Budget.

6.22 The Council participated in the London Pool for three years (2018/19 – 2020/21). London chose not to continue the Pool in 2021/22 due to the significant impact that the Covid 19 pandemic had had on the business community and therefore forecast revenues. Pooling was revisited for 2022/23 and, while a London-wide pool was not deemed viable, a smaller pool consisting of Haringey and 7 other London boroughs was put into place for that year. This continued in 2023/24.

6.23 Modelling was undertaken during September which showed that the continuation of this 8 Borough pool is expected to have a similar financial benefit in 2024/25 to the current year of c.£2.0m. The draft Budget presented to Cabinet in December confirmed the Council's support for the continuation of the smaller pool for 2024/25 and delegated the final decision to participate to the Director of Finance in consultation with the Cabinet Member for Finance. This decision has now been made. The £2m benefit was already built into the draft Budget for one year only.

6.24 The PLGFS confirmed a 6.7% inflationary increase to business rates income including RSG, in 2024/25. This was already the assumption in the draft Budget, so no changes required to this assumption. Given on-going uncertainty about inflation for next year, funding across these budget heads from 2025/26 have been assumed as broadly flat for now and will be revisited at the next MTFS update.

6.25 In terms of net growth in the business rates taxbase / hereditaments, the planning assumption across the MTFS period is that there will be no net growth. This is in line with the previous assumptions.

6.26 Collection rates have improved post pandemic and the forecast collection rate for 2024/25 has been set at 97%, which will represent a further improvement on current performance.

6.27 The resulting forecast income from business rates related income, including revenue support grant, is shown in table 6.1 below.

6.28 As noted above, we have not felt it possible at this point to amend projections beyond 2025/26.

Table 6.1

	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29
Revenue Support Grant	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**
RSG	(25,635)	(27,353)	(27,517)	(27,517)	(27,517)	(27,517)
NNDR Top Up Grant	(59,451)	(63,686)	(95,991)	(95,991)	(95,991)	(95,991)
NNDR Income & Fees	(19,800)	(22,288)	(22,414)	(22,414)	(22,414)	(22,414)
Section 31 Grants	(21,546)	(22,251)	(0)	(0)	(0)	(0)
Bus Rates Pool Benefit	(2,000)	(2,000)	-	-	-	-
NNDR (Surplus)/Deficit	1,271	-	-	-	-	-
Total	**(127,162)**	**(137,578)**	**(145,922)**	**(145,922)**	**(145,922)**	**(145,922)**

Council Tax

6.29 The current assumptions about Council Tax are set out below.

- A 2.99% increase in Council Tax in 2024/25 after which it reduces to 1.99% across the MTFS period.
- A 2% increase in ASC Precept for 2024/25 after which it is assumed to discontinue.
- The tax base for 2024/25 is forecast to grow by a slightly higher rate of 1.65% than the 1% assumed in the draft Budget report. This is forecast

to yield an additional £0.850m compared to the draft budget assumption. Thereafter, the planning assumption is 1% growth per annum across the remaining MTFS period.

- The 16 January 2024 Cabinet meeting approved the adoption of a revised definition of a long-term empty dwelling, which is subject to approval by Full Council in March 2024. This is estimated to deliver an additional £0.9m council tax per annum from April 2024 and this sum has now been built into the Budget proposals.
- The collection rate is assumed to continue on a post pandemic improvement and is forecast at 97% in 2024/25. This collection rate is assumed across the remainder of the MTFS period. No change has been made since the draft Budget report.
- The Revenues service have been given one-off resources to focus on the collection of arrears. On the back of this, a one-off £1m additional income has been assumed as deliverable in 2024/25 and was included in the December draft budget report.
- Following the calculation of the final Council Tax 2022/23 and the estimated 2023/24 position, a surplus of £2.6m due to Haringey is forecast. Given that the 2023/24 figure is an estimate at this time, the final 2024/25 Budget only builds in a £1.5m one-off sum. This is a further improvement to the overall Council Tax income assumed in the draft report.

6.30 The resulting projections for Council Tax income and Band D rates are set out in Table 6.2 below. Compared to the draft Budget assumptions, there has been a £3.25m improvement for 2024/25 from the amendments outlined above. These figures are still subject to the formal Council ratification of Council Tax Rates in March 2024.

Table 6.2

	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29
	£'000	£'000	£'000	£'000	£'000	£'000
Taxbase before collection rate	82,823	83,038	84,408	85,252	86,105	86,966
Taxbase change	0.26%	1.65%	1.00%	1.00%	1.00%	1.00%
Taxbase for year	83,038	84,408	85,252	86,105	86,966	87,836
Collection Rate	96.00%	97.00%	97.00%	97.00%	97.00%	97.00%
Taxbase after collection rate	**79,716**	**81,876**	**82,694**	**83,522**	**84,357**	**85,201**
Council Tax increase	2.99%	2.99%	1.99%	1.99%	1.99%	1.99%
Social Care precept	2.00%	2.00%	0.00%	0.00%	0.00%	0.00%
Band D rate	1,558	1,636	1,668	1,702	1,736	1,736
Council Tax Before Surplus	**124,502**	**135,533**	**139,562**	**143,715**	**147,992**	**149,456**
Arrears Improvement		**2,500**				
Council Tax Yield	**124,502**	**138,033**	**139,562**	**143,715**	**147,992**	**149,456**

Grants

6.31 The Council receives a number of grants in addition to its main funding allocation. Some of these grants are ring-fenced, which means they can only be spent on specific services. The most significant specific grants are discussed below.

Social Care Grants

6.32 The SR21 announced that specific grants would remain 'cash flat' although the subsequent Policy statement included in the 2023/24 Local Government Finance Settlement, confirmed a national increase to the Social Care Support Grant and Discharge Funding Grant for 2024/25. This intelligence was used to build estimated figures into the draft Budget report.

6.33 The 2024/25 PLGFS provided local authority level allocations, and these have been reflected in this final Budget. This has seen an improvement of £1.5m compared to the draft budget.

6.34 The assumptions from 2025/26 are that the Discharge Funding grant ceases and all other grants remain flat. This is a prudent approach given the likelihood of a new Government for the next settlement along with potential new policy directions.

6.35 This is represented in Table 6.3 below. It should be noted that all these social care grants have been allocated directly against the relevant service budget heads rather than being kept corporately.

Table 6.3 Social Care Grant

	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29
Revenue Support Grant	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**
Better Care Fund (BCF) - (CCG Contribution)	(6,388)	(6,388)	(6,388)	(6,388)	(6,388)	(6,388)
Improved & Add'l Imp Better Care Fund (iBCF)	(9,806)	(9,806)	(9,806)	(9,806)	(9,806)	(9,806)
Social Care Support Grant	(19,261)	(24,832)	(24,832)	(24,832)	(24,832)	(24,832)
Adult Social Care Market Sustainability and Improvement Funding	(2,689)	(5,023)	(5,023)	(5,023)	(5,023)	(5,023)
Discharge Funding grant	(1,375)	(2,291)	-	-	-	-
Manual adj for rolling in of Independent Living Fund grant into overall CSP	681	-	-	-	-	-
Total	**(38,837)**	**(48,339)**	**(46,048)**	**(46,048)**	**(46,048)**	**(46,048)**

Homelessness Prevention Grant (HPG)

6.36 Last year, the Government consulted on a revised funding methodology for this grant however, no final conclusions have been reached.

6.37 No further information was included in the PLGFS and the 2024/25 HPG allocations have yet to be confirmed therefore, the final Budget makes no adjustments to the existing grant level of £8.5m. Any major variations from this will be reported in the Full Council budget report.

Core Grants

6.38 The assumptions set out below now include the implications from the 18 December 2023 PLGFS announcements.

- Revenue Support Grant (RSG) is a core grant but fundamentally linked to the Business Rates system and so discussed in that Section above.
- The Housing Benefit Admin grant is assumed to be cash flat but continue across the MTFS.
- The Public Health (PH) grant is currently still assumed as cash flat across the MTFS however in recent years some uplift has been applied and it is likely that this will continue for 2024/25. However, as announcements of the final value are normally received after the final budget reports, no uplift has been built into the draft budget at this point. It must be noted that this grant is ring-fenced to PH activity and both the grant income and expenditure are allocated directly to the Public Health service.
- New Homes Bonus – Government have previously indicated that the methodology for apportioning this grant would be amended or replaced entirely. This agenda hasn't yet moved forward, and the Government is proposing to roll over last year's policy on New Homes Bonus (NHB) for a new round of payments in 2024-25, which will attract no new legacy payments, similar to the past two years. The PLGFS allocation was £0.2m less than assumed in the Draft Budget report.
  From 2025/26 it is assumed as cash flat. This funding is one of the greatest risks regarding any further decisions at central government level around the Levelling up agenda.

6.39 Table 6.4 shows the Core grant values currently assumed across the MTFS period. We have not felt it possible at this point to amend projections beyond 2025/26.

Table 6.4

	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29
Grant	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**
Housing Benefit Admin Grant	(1,351)	(1,351)	(1,351)	(1,351)	(1,351)	(1,351)
New Homes Bonus (NHB) / Replacement Funding	(2,105)	(1,790)	(1,798)	(1,798)	(1,798)	(1,798)
2022/23 Service Grant / Replacement Funding	(3,185)	(553)	(553)	(553)	(553)	(553)
Total	**(6,641)**	**(3,694)**	**(3,702)**	**(3,702)**	**(3,702)**	**(3,702)**
RSG	(25,635)	(27,353)	(27,517)	(27,517)	(27,517)	(27,517)
Total (inc. RSG)	**(32,276)**	**(31,047)**	**(31,219)**	**(31,219)**	**(31,219)**	**(31,219)**

Fees and Charges

6.40 The Council's policy in relation to varying external income requires service managers to review the level of fees and charges annually as part of budget setting and that charges should generally increase by the rate of inflation to maximise allowable income.

6.41 The setting of fees and charges, along with raising essential financial resources, can contribute to meeting the Council's objectives. Through the pricing mechanism and wider market forces, outcomes can be achieved, and services can be promoted through variable charging policies and proactive use of fees to promote or dissuade certain behaviours.

6.42 In the main, fees and charges are set at a level where the full cost of provision is recovered through the price structure. However, in many circumstances

those charges are reduced through subsidy to meet broader Council priorities.

6.43 Each year the Council reviews the level of its fees and charges through consideration of a report by the Cabinet and its Licensing Committee where it is a requirement that they are considered and approved outside of the Executive.

6.44 The proposed 2024/25 fees and charges have now been agreed other than those fees / charges that the Council is required to consult upon.

Use of Reserves

6.45 The Council's (Non-Earmarked) General Fund Balance is held to cover the net impact of risks and opportunities and other unforeseen emergencies. The funds held in the General Fund Reserve can only be used once and therefore are not a recurring source of income that can meet permanent budget gaps.

6.46 In setting a balanced budget for 2023/24 the Council agreed to use £3.5m of the Strategic Budget Planning reserve which had been previously earmarked for this purpose.

6.47 That Budget/MTFS report in March 2023 forecast a gap for 2024/25 of c. £6.3m. The draft Budget presented to Cabinet on 5 December 2023 had a gap of £16.3m. This report describes the significant further work that has taken since then and the December gap has reduced to £5.9m which is proposed to be met from the Strategic Budget Planning reserve.

6.48 This is a one-off solution, and focus must quickly turn to the identification of solutions to sustainably balance the 2025/26 Budget and the following years of that MTFS.

6.49 The final Budget report to Full Council on 4 March will provide an updated schedule of the Council's reserve position and more supplementary information. This will make clear that the Council now has c. £23m of available useable reserves, in additional to the c. £15m within its General Fund balance. These are the resources that the Council has available to address:

- The 2023/24 year end overspend which at Qtr2 was forecast to be £20m (which will be part mitigated by the application of the c. £7m contingency);
- The planned £5.9m use of reserves to balance the 2024/25 Budget.

Summary of Funding Assumptions

6.50 A summary of the currently assumed funding levels and sources is set out in Table 6.5 below.

Table 6.5

	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29
Funding Source	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**
Council Tax	(124,212)	(135,533)	(139,538)	(143,662)	(147,914)	(147,914)
Council Tax Surplus	-	(2,500)	(0)	(0)	(0)	(0)
RSG	(25,635)	(27,353)	(27,517)	(27,517)	(27,517)	(27,517)
Top up Business Rates	(59,451)	(63,686)	(95,991)	(95,991)	(95,991)	(95,991)
Retained Business Rates	(19,800)	(22,288)	(22,414)	(22,414)	(22,414)	(22,414)
Section 31 Grants	(21,546)	(22,251)	(0)	(0)	(0)	(0)
NNDR (Surplus)/Deficit	1,271	-	-	-	-	-
NNDR Pool	(2,000)	(2,000)	-	-	-	-
New Homes Bonus	(2,105)	(1,790)	(1,798)	(1,798)	(1,798)	(1,798)
Public Health	(21,502)	-	-	-	-	-
Other core grants	(4,536)	(1,904)	(1,904)	(1,904)	(1,904)	(1,904)
Total External Funding	**(279,517)**	**(279,305)**	**(289,162)**	**(293,286)**	**(297,538)**	**(297,538)**
Contributions from Reserves	(3,500)	(6,404)	(294)	(145)	(11)	(11)
Total Funding	**(283,017)**	**(285,709)**	**(289,456)**	**(293,431)**	**(297,549)**	**(297,549)**

7. General Fund Revenue Assumptions

7.1 2023-24 Financial Performance at Qtr2

7.2 The Qtr2 forecast position of £20.9m is broadly in line with that reported in Qtr1 (£20.5m). Although the majority continues to be driven by Adults social care pressures, this figure has improved to £13.9m compared to the £17.5m reported at Qtr1. The majority of this is due to additional one-off grant funding received so cannot be assumed to continue in 2024/25. The forecast for temporary accommodation has deteriorated by £0.8m due to a small increase in the overall number of households living in temporary accommodation and increased cost of providing temporary accommodation due to limited supply. As highlighted in the Qtr1 report, the Adults social care pressure was apparent in the 2022/23 Provisional outturn report, but the temporary accommodation is an emerging pressure caused by wider economic conditions which have seen rents increase significantly and landlords leaving the market.

7.3 It must be stressed that this Council is not alone in facing budgetary pressures in these service areas; these are being felt nationally. The authority works hard each year to understand service pressures, build in growth where appropriate and possible as well as identifying efficiencies. However, the impact of inflation and restricted and short-term funding is leaving this authority and many others across the sector in an extremely difficult financial position.

7.4 In year delivery of the agreed savings programme has improved slightly at Qtr2 and, overall, £13.7m (78%) of the £17.5m is forecast to be delivered. Directors continue to focus on improving the position further before the end of the year or identify mitigating solutions.

7.5 As part of ensuring that future year's budgets are as sound and deliverable as possible, a detailed review of the agreed savings 'RAG-rated' as Amber or Red either for 2023/24 or beyond has been undertaken. This has resulted in a proposal to write off 7 proposals totalling £2.8m in 2024/25 (£4.4m across the MTFS period). These are genuinely not deliverable because the original

assumptions are no longer viable or are unable to deliver to the value originally intended. The impact of this decision has been recognised in the draft 2024/25 Budget.

7.6 It is not clear at this point the extent that the cost of living crisis will continue to have on residents ability to pay council tax and other fees and charges and businesses ability to pay business rates. This will be reviewed in detail as part of the closure of the 2023/24 accounts when existing provisions for bad debt are re-calculated.

7.7 The impact of the forecast high levels of inflation was acknowledged when the 2023-24 Budget was set. While for non-demand led services, the estimated budget looks to be broadly sufficient, the recently agreed staff pay award is likely to require more funding than was allowed for. Inflation in the demand led services of Adults, Children's and Temporary Accommodation are all running much ahead of the forecasts, for reasons outlined above.

7.8 The Bank of England's strategy for reducing inflation is to increase borrowing rates, which increased steadily over the first 5 months of this year and now stands at 5.25%. This is putting pressure on the Council's repayment of debt and has led to a fundamental review of in year and future year's capital programme with a view to reducing, removing or postponing schemes fully or partially funded by Council borrowing.

7.9 The number of identified pressures and overall volatility is concerning and makes forecasting in year open to considerable challenges. Furthermore, many of the issues are outside the direct control of Council and many of these look to continue into at least the first part of 2024-25.

7.10 **The 2024/25 Budget and 2024/29 Medium Term Financial Strategy (MTFS)**

7.11 It became clear early on in this year that the financial situation had worsened for most local authorities, this Council included, and this has been key in shaping the approach to the financial planning work for 2024/25. There has been a further step-up in finance and budget dialogue with managers throughout the Council, and with the Cabinet individually and collectively.

7.12 All senior managers participated in a Budget Fortnight, aimed at identifying cross directorate savings and efficiencies or where activities were duplicated across various Directorates. The output of this activity led to a number of saving and / or cost avoidance business cases which were then shared with Cabinet.

7.13 Running parallel to this, Directorates were tasked with identifying any new savings proposals or management actions that could be put to Cabinet to drive further reductions in expenditure or generate additional income.

7.14 The outcome of this activity overall led to an initial list of savings which were included in the Draft Budget report. That report made clear that further work would be undertaken in the intervening period to identify additional

opportunities to reduce down the overall net expenditure. This exercise identified an additional £4.0m management actions and **£0.7m** of savings which are detailed in Appendix 3b along with those presented in December.

7.15 Directors have also been identifying a series of management actions which will reduce down net expenditure in their service budgets from April 2024. To ensure these are delivered as planned, they will be monitored on a monthly basis along with the agreed savings programme.

7.16 Despite the fact that any growth will inevitably require a higher level of savings to be identified, the Budget has had to recognise the real pressures being seen in the current year particularly in the demand led services. The majority of the growth required is to address the brought forward 2023/24 base budget pressures and to build in realistic sums to cover on-going inflationary pressures which are being compounded by lack of availability of supply. The 2024/25 financial planning process has involved extensive modelling to identify the most realistic level of spend across the care services and temporary accommodation.

7.17 Over and above this, growth has had to be recognised in some of the back office services such as Digital and Legal and Governance where the organisation has little choice but to protect itself from cyber attacks and provide accurate and timely legal advice. On-going high levels of interest have required additional sums to be built into the treasury and capital financing budgets.

7.18 The outcome of the financial planning work has been to identify in as full a way as possible the growth required to set realistic Directorate and corporate budgets. However, although new savings have been put forward both in the draft Budget and further proposals in this final report, there remains a gap between expenditure and income of £5.9m which will be met from a drawdown from the Strategic Budget Planning reserve.

7.19 **Budget Growth and Pressures**

7.20 The main corporate assumptions across the MTFS period are outlined below followed by a section focussing on the policy priorities and service specific items.

7.21 **Inflation**

7.22 The latest published inflation rate for December 2023 was a further reduction to 4% (4.6% October) mainly driven by reductions in food, non-alcoholic beverages and transport.

7.23 This is clearly a positive direction of travel and the Government still expect the Bank of England to work to bring inflation down to the 2% target as soon as possible. Forecasts for 2024/25 rates in the January update provided by

the Treasury indicate that the figure could fall back to 2.2% by the end of the next financial year.

7.24 The **pay deal** for 2023/24 was a flat rate per employee amounting to an average 5.4% increase. The 2024/25 Budget assumes a 4% pay award is agreed for 2024/25 falling to 3% in 2025/26 then 2% from 2026/27 and beyond.

7.25 The impact of inflationary increases in the **demand led services** is addressed as part of the overall annual demand modelling exercise. This is based on an estimated 4% inflation rate for 2024/25.

7.26 For **all other non-pay inflation**, the assumption continues that the services will broadly have to manage within existing budgets, thus absorbing any inflationary pressures. However, in recognition that some contracts include inflation-linked increases and utility costs continue to be volatile and difficult to predict an annual allowance is built into the budget to address these items should they arise.

7.27 All non-pay inflation assumptions have been revisited since the publication of the Draft Budget. This has led to a recast estimate for 2024/25 of £1.8m a positive revision down of £0.6m. Due to the various services impacted, the actual % change is a composite. From 2025/26 the budget allowance returns to a more stable figure of c. £1.5m pa.

Employer Pension Contributions

7.28 The last triennial valuation covered the period 2023-2026 showed that the Council would need to increase its contribution rate by 0.5% across each of the two years 2024/25 and 2025/26. The estimated budgetary impact was £0.6m for each year and this was built into the 2023-2029 MTFS agreed in March 2023.

7.29 No assumptions have yet been made about the financial impact of the next triennial valuation (2026-2029).

Treasury & Capital Financing

7.30 In recognition of the impact that interest rates are having on borrowing costs, additional growth of £2.3m had been built into the Draft 2024/25 Budget with a further £6.8m across the following 3 years. This is on top of growth already assumed in the previous MTFS.

7.31 This impact would have been greater had the Council not undertaken the review of the existing capital programme and consequent level of proposed reductions detailed in the Draft Budget report. Further challenge has been undertaken since then and a small improvement to forecast growth made in 2024/25 with c. £1m net reduction across the remainder of the MTFS period. Further detail is provided in Section 8.

Levies

7.32 The majority of levy costs are forecast to remain broadly in line with the 2023/24 figures across the MTFS period. The exception is the apprenticeship levy which, as it is calculated as a % of the paybill has gradually moved above the existing budgetary provision. This budget has now been adjusted with an additional £0.250m added.

7.33 Since the publication of the Draft Budget, the 2024/25 NLWA levy estimate has been updated and increased by c. £0.5m. The final figure will not be confirmed until early February, after the publication of this report and therefore, any further adjustments built into the final Budget presented to Full Council on 4 March.

Concessionary Fares

7.34 Each London Borough funds the cost of concessionary fares (the Freedom Pass) for older residents in their borough. The final charge for Concessionary Fares has now been received which results in a one-off improvement of c. £0.5m for 2024/25 as usage has yet to return to pre-pandemic levels.

Contingency

7.35 The Council holds a single corporate contingency largely to manage any slippage to the agreed budget reduction programme in any one year as well as addressing unforeseen circumstances which cannot realistically be built into budget plans. This draft Budget assumes that the contingency for 2024/25 and across the remainder of the MTFS remains at c.£7.4m.

Policy Priorities

7.36 Despite the challenges outlined in this report, this draft Budget for 2024/25:

- Ensures we can continue to meet the significant need of our most vulnerable residents – through further, year on year additional investment in Children's, Adult's and Temporary Accommodation services. (£25.5m in 2024/25 alone)
- Drives value for money through a significant efficiency and reform agenda – with every area of the council contributing.

Service Growth

7.37 The **existing** MTFS contained a level of growth across the 2024-28 period which has been reviewed but confirmed as still required. The amounts by Directorate are shown in Table 7.1a below.

Table 7.1a – Existing Growth

Directorate	2024/25 £000s	2025/26 £000s	2026/27 £000s	2027/28 £000s	2028/29 £000s	Total
Adults, Healths & Communities	4,102	2,789	2,821	0	0	9,712
Children's Services	482	20	20	0	0	522
Corporate	5,656	7,106	3,400	6,900	0	23,062
Culture, Strategy & Engagement	(184)	(165)	363	(134)	0	(120)
Environment & Resident Experience	(94)	0	0	0	0	(94)
Legal and Governance	0	0	0	0	0	0
Placemaking & Housing	(605)	0	(30)	0	0	(635)
Total	**9,357**	**9,750**	**6,574**	**6,766**	**0**	**32,447**

7.38 The financial planning process this year has sought to be as robust as possible recognising structural base budget issues referred to in the sections above, along with forecasts for future requirements which are largely driven by inflation, lack of supply and also the impact of writing out agreed savings that are no longer viable.

7.39 The draft Budget report proposed £46.5m total new growth across the MTFS period with £24.992m in 2024/25 alone. Since the draft Budget was published a few additional 2024/25 pressures have been highlighted, totalling £0.715m. These are mainly unavoidable corporate items including increased budget for bank charges and also external audit fees. These new sums have been built into the final Budget.

7.40 Table 7.1b below details the **total** proposed **new growth** by Directorate arising from this year's financial planning process.

Table 7.1b – Total New Growth

Directorate	2024/25 £000s	2025/26 £000s	2026/27 £000s	2027/28 £000s	2028/29 £000s	Total
Adults, Healths & Communities	19,467	7,311	5,279			32,057
Children's Services	1,388	660	660			2,708
Corporate	533					533
Culture, Strategy & Engagement	1,210					1,210
Environment & Resident Experience	1,046					1,046
Legal and Governance	608					608
Non-Service Revenue	455					455
Total	**24,707**	**7,971**	**5,939**	**0**	**0**	**38,617**

7.41 Table 7.1c below summarises the **total** budget growth proposed to be built into each Directorate for 2024/25 and across the remainder of the MTFS which includes that included in the existing MTFS plus the total new growth arising from this year's financial planning process.

Table 7.1c – Total Planned Growth

Directorate	2024/25 £000s	2025/26 £000s	2026/27 £000s	2027/28 £000s	2028/29 £000s	Total
Adults, Healths & Communities	23,569	10,100	8,100	0	0	41,769
Children's Services	1,870	680	680	0	0	3,230
Corporate	6,189	7,106	3,400	6,900	0	23,595
Culture, Strategy & Engagement	1,026	(165)	363	(134)	0	1,090
Environment & Resident Experience	952	0	0	0	0	952
Placemaking & Housing	(605)	0	(30)	0	0	(635)
Legal and Governance	608	0	0	0	0	608
Non-Service Revenue	455	0	0	0	0	455
Total	**34,064**	**17,721**	**12,513**	**6,766**	**0**	**71,064**

Budget Reduction / Savings

7.42 The Council has previously **agreed** £25.8m savings to be delivered across the period 2024- 2028 as set out in the table below.

Table 7.2a – Previously Agreed Savings or Budget Reductions

Management Area	2023/24 £'000s	2024/25 £'000s	2025/26 £'000s	2026/27 £'000s	2027/28 £'000s	Total
Adults, Healths & Communities	6,848	3,067	(159)	(100)	0	9,656
Children's Services	1,630	230	0	0	0	1,860
Cross-Cutting	500	500	1,360	0	0	2,360
Culture, Strategy & Engagement	1,089	969	210	5	5	2,278
Environment & Resident Experience	6,974	491	1,459	(6)	44	8,962
Placemaking & Housing	470	110	70	0	0	650
Total	**17,511**	**5,367**	**2,940**	**(101)**	**49**	**25,766**

7.43 As is the practice in this Council, as part of the financial planning process all existing savings plans are reviewed and challenged robustly to ensure that they can still be met as originally agreed and if not, looks to re-profile or write off.

7.44 The draft Budget report identified £4.4m of savings no longer deemed viable and which were removed from the December draft Budget and MTFS. Since then, a further £1.3m of adjustments relating to Housing demand has been identified as necessary due to the re-alignment of existing and new savings proposals. This too has been removed to ensure that the final Budget for 2024/25 is as robust and deliverable as possible.

7.45 The resulting **total** adjustments to existing savings are shown by Directorate in the table below.

Table 7.2b – Removed/Written off Savings

Management Area	2023/24 £'000s	2024/25 £'000s	2025/26 £'000s	2026/27 £'000s	2027/28 £'000s	Total
Adults, Healths & Communities	1,900	1,717	(159)	(100)	0	3,358
Culture, Strategy & Engagement			655			655
Environment & Resident Experience	15	20	1,320	0	0	1,355
Placemaking & Housing	100	100	70			270
Total	**2,015**	**1,837**	**1,886**	**(100)**	**0**	**5,638**

7.46 The changes to the Adults, Health and Communities existing programme represents their re-articulation of their approach which is now set out in their new savings proposals. The major change in 2025/26 for Environment and Resident Experience reflects the current expectation of the implication of the introduction of the new waste management contract.

7.47 The **new budget reduction / savings proposals** generated through this year's financial planning process are a mixture of management actions and those that require policy decision. The former include value for money initiatives, service redesign or service restructures.

7.48 The initial proposals were included in the December draft Budget report, but since then further work has been undertaken to identify new opportunities.

7.49 The initial **management actions** included in the draft Budget report totalled £2.908m in 2024/25 and £5.8m across the whole MTFS. The new management actions identified since then total £4.0m for 2024/25 and £8.0m across the whole MTFS period.

7.50 The combined total proposed management actions are shown by Directorate in the following table.

Table 7.2c – Total Proposed Management Actions

Directorate	2024/25 £'000s	2025/26 £'000s	2026/27 £'000s	2027/28 £'000s	2028/29 £'000s	Total
Adults, Healths & Communities	1,780	320	(300)	0	0	1,800
Children's Services	603	320	320	365	50	1,658
Corporate	300	250	0	0	0	550
Culture, Strategy & Engagement	713	70	125	0	0	908
Environment & Resident Experience	1,372	339	518	905	850	3,985
Finance	750	200	100	225	200	1,475
Placemaking & Housing	1,404	453	585	635	275	3,352
Total	**6,922**	**1,952**	**1,348**	**2,130**	**1,375**	**13,728**

7.51 The initial **policy related savings** included in the draft Budget report totalled £8.1m in 2024/25 and £13.9m across the whole MTFS. The new policy savings identified since then total £0.7m for 2024/25 and £5.0m across the whole MTFS period.

7.52 The combined total policy related savings are shown by Directorate in the following table.

Table 7.2d – Total Proposed Policy Savings

Directorate	2024/25 £'000s	2025/26 £'000s	2026/27 £'000s	2027/28 £'000s	2028/29 £'000s	Total
Adults, Healths & Communities	5,563	1,934	777	724	1,220	10,218
Culture, Strategy & Engagement	1,540	1,419	572	0	0	3,531
Environment & Resident Experience	1,698	1,163	1,402	289	17	4,569
Placemaking & Housing	0	75	50	100	410	635
Total	**8,801**	**4,591**	**2,801**	**1,113**	**1,647**	**18,953**

7.53 In total, this year's financial planning process has identified a total of £32.68m new management or policy savings. This is shown by Directorate in the Table 7.2e below.

Table 7.2e Total new Management and Policy savings

Directorate	2024/25 £'000s	2025/26 £'000s	2026/27 £'000s	2027/28 £'000s	2028/29 £'000s	Total
Adults, Healths & Communities	7,343	2,254	477	724	1,220	12,018
Children's Services	603	320	320	365	50	1,658
Corporate	300	250	0	0	0	550
Culture, Strategy & Engagement	2,253	1,489	697	0	0	4,439
Environment & Resident Experience	3,070	1,502	1,920	1,194	867	8,554
Finance	750	200	100	225	200	1,475
Placemaking & Housing	1,404	528	635	735	685	3,987
Total	**15,723**	**6,543**	**4,149**	**3,243**	**3,022**	**32,681**

7.54 The net impact of all the above adjustments and additions is a total savings programme across the 2024-2029 period of £38.2m, with £19.5m for 2024/25 alone. This is set out by Directorate in Table 7.2f below.

Table 7.2f Total 2024/25 – 2028/29 Agreed Savings Programme

Directorate	2024/25 £'000s	2025/26 £'000s	2026/27 £'000s	2027/28 £'000s	2028/29 £'000s	Total
Adults, Healths & Communities	8,693	2,254	477	724	1,220	13,368
Children's Services	833	320	320	365	50	1,888
Cross-Cutting	500	1,360	0	0	0	1,860
Corporate	300	250	0	0	0	550
Culture, Strategy & Engagement	3,222	1,044	702	5	0	4,973
Environment & Resident Experience	3,541	1,641	1,914	1,238	867	9,202
Finance	750	200	100	225	200	1,475
Placemaking & Housing	1,414	528	635	735	685	3,997
Total	**19,253**	**7,597**	**4,148**	**3,292**	**3,022**	**37,313**

7.55 **Summary General Fund Revenue Budget Position 2024/25 – 2028/29**

7.56 After taking into account the proposed amendments to existing plans and funding, the new management actions, policy savings and growth proposals discussed in the sections above, the final General Fund revenue Budget position for next year and across the MTFS period is set out in the table below.

Table 7.3 – Summary Revenue Budget Position 2023-2029

	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29
	Budget	Budget	Projected	Projected	Projected	Projected
Directorate	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**
Adults, Health & Communities	108,701	95,564	105,701	113,074	112,350	111,130
Children's Services	62,949	65,173	65,533	65,893	65,128	65,078
Culture, Strategy & Engagement	33,569	26,777	23,378	23,188	23,183	23,183
Environment & Neighbourhood	14,565	17,275	19,569	17,811	16,439	15,572
Placemaking & Housing	7,829	5,505	4,977	4,312	3,577	2,892
Chief Executive	305	22	(229)	(229)	(229)	(229)
Corporate Governance	2,283	3,201	3,201	3,201	3,201	3,201
Finance	52,815	72,193	83,999	94,017	103,186	103,856
Council Cash Limit	**283,017**	**285,709**	**306,129**	**321,267**	**326,835**	**324,683**
Planned Contributions from Reserves	(3,500)	(6,404)	(294)	(145)	(11)	(11)
Further Savings to be Identified	-	(0)	(16,966)	(27,980)	(29,296)	(27,144)
Total General Fund Budget	**279,517**	**279,305**	**288,869**	**293,142**	**297,528**	**297,528**
Council Tax	(124,212)	(135,533)	(139,538)	(143,662)	(147,914)	(147,914)
Council Tax Surplus	-	(2,500)	(0)	(0)	(0)	(0)
RSG	(25,635)	(27,353)	(27,517)	(27,517)	(27,517)	(27,517)
Top up Business Rates	(59,451)	(63,686)	(95,991)	(95,991)	(95,991)	(95,991)
Retained Business Rates	(19,800)	(22,288)	(22,414)	(22,414)	(22,414)	(22,414)
Section 31 Grants	(21,546)	(22,251)	(0)	(0)	(0)	(0)
NNDR Surplus/(Deficit)	1,271	-	-	-	-	-
NNDR Growth	(2,000)	(2,000)	-	-	-	-
Total Main Funding	**(251,374)**	**(275,611)**	**(285,461)**	**(289,585)**	**(293,837)**	**(293,837)**
New Homes Bonus	(2,105)	(1,790)	(1,798)	(1,798)	(1,798)	(1,798)
Public Health	(21,502)	-	-	-	-	-
Other core grants	(4,536)	(1,904)	(1,904)	(1,904)	(1,904)	(1,904)
Total Core/Other External Grants	**(28,143)**	**(3,694)**	**(3,702)**	**(3,702)**	**(3,702)**	**(3,702)**
Total Income	**(279,517)**	**(279,305)**	**(289,162)**	**(293,286)**	**(297,538)**	**(297,538)**

Similarly, to previous years, there has been limited progress to address the structural budget gap which is forecast to reach c£28m by 2026/27 (Given the degree of economic and future funding uncertainties, our projections beyond this point were not able to be soundly modelled).
It should also be noted that the Public Health Grant income has been moved from 'core grant' line into the Adults, Health and Communities service line to reflect both income and expenditure in the same Service to facilitate monitoring.

The Finance Directorate budget line in the table above includes not just the costs associated with running that directorate but also corporate expenditure including contingencies, capital financing, central inflation provisions and levies.

Review of Assumptions and Risks Across the Budget and MTFS Period 2024-2029

7.57 The Council's Section 151 Officer has a statutory responsibility to assess the robustness of the Council's budget and to ensure that the Council has

sufficient contingency/reserves to provide against known risks in respect of both expenditure and income. This formal assessment will be made as part of the final report on the Council's budget in March 2024 and will draw on independent assessments of the Council's financial resilience where available however, it is critical that this **2024/25 Budget** report outlines the assumptions and approach to risk taken when arriving at the final budget proposals.

7.58 Given the increased financial pressure that is falling upon the local government sector and the uncertain national political and economic picture, this statutory role has recently been acquiring more and more significance. The number and breadth of potential risks and uncertainty, particularly around the level of Government funding into the Local Government sector overall, and more importantly for this Council, are unprecedented. Add to this a still volatile economic situation and a general election that must take place before 28 January 2025, all underline the challenges being faced.

7.59 These factors clearly underline the need to keep both the budgeted contingency and the general fund reserve at current levels and, as far as practical, to keep earmarked reserves close to current levels or above.

7.60 The main uncertainties and risks identified to date which may or are likely to impact on the Council's budget for 2024/25 and over the period of the MTFS are:

- The final detailed grant funding figures for 2024/25 and beyond have yet to be announced as are still subject to the final local government settlement expected in February 2024.
- On-going lack of multi-year funding allocations.
- The national economic outlook, in particular if inflation continues to fall or not; interest rates levels; on-going impact of wars and unrest internationally on costs and supply chains.
- The timing of the General Election and any consequential policy or tax changes.
- The extent to which these factors will continue to place stress on individuals and businesses and consequently their ability to meet their Council Tax, Business Rates and other bills.
- Government legislation and policy concerning homelessness and addressing the housing crisis
- The pace at which planned actions to increase Council-managed temporary accommodation take place
- Continuation of the progress to date on the delivery of the agreed Safety Valve programme strategy to agreed timetable.
- The Levelling Up agenda and associated funding distribution methodologies could be negative for this Council's funding allocations.
- The Council's savings programmes do not deliver the required savings, do not deliver savings quickly enough.
- Any further deterioration in the forecast 2023/24 position including non-delivery of in year savings

- The ability to retain and attract suitably qualified and skilled workforce hampers the delivery of the Council's ambitions.

8. Capital Strategy & Programme

8.1 As was stated in the December report, further work on the capital programme would be undertaken. This work has concluded and there are a number of revisions. The impact of this rigour can be seen when comparing the latest capital programme projection to 2027/28 (£583m) with that agreed in March 2023 (£1,008m), a reduction of £425m.

8.2 In the Children's Services capital programme there has been a minor revision downwards of £0.5m in 2024/25. However, for following years an assumption has been made that there will be a lower level of expenditure. Over the MTFS period there is a £8m lower budget for capital works to schools.

8.3 The budget for Pendarren House has been set at £0.5m for 2024/25, down from £2.471m. The 2024/25 budget will enable the highest priority works to be undertaken. Any further proposals for capital expenditure at the centre will be considered as part of setting next year's capital programme alongside all the other competing calls on the Council's available capital resources.

8.4 The Environment & Resident Experience capital programme is highly reliant on Council borrowing with limited ability to generate external investment. The review identified several reductions to a range of schemes of £11m over the MTFS period.

8.5 Within the Placemaking & Housing capital programme there has been a minor reduction of £0.5m to the regeneration budgets in Tottenham, a reduction of £4m to the regeneration budgets in Wood Green and a reduction of £7.75m to the Asset Management of Council Buildings.

8.6 The capital programme is formally reviewed annually and future reviews will include an assessment of the adequacy and affordability of these and all programme heads.

8.7 This capital strategy report gives a high-level overview of how capital expenditure, capital financing, and treasury management activities contribute to the provision of public services in Haringey. It also provides an overview of how the risks of the capital programme are managed and the implications for future financial sustainability.

8.8 In the financing of the Council's capital programme, £9.7m of Strategic Community Infrastructure Levy (SCIL) has been used on eligible projects in accordance with the regulations. They are the Walking & Cycling Action Plan (WACAP) scheme, the Road Casualty Reduction scheme & the School Streets scheme.

8.9 The current economic environment has impacted the capital programme in a number of ways. Higher levels of persistent inflation and the subsequent Bank of England response by raising interest rates to tame inflation has meant that the interest that the Council pays on new borrowing undertaken to finance the capital programme (both the existing capital programme and the proposed additions) has increased significantly. The higher levels of inflation have also impacted the cost of raw materials and the tightness in the supply chain for capital works (labour and materials) which has added both cost and time to schemes. In addition, the increased costs are making it increasingly difficult to achieve self-financing business cases for those schemes where this is expected.

8.10 The current capital programme has deferred a number of schemes that were originally expected to be self-financing as they were not able to produce a business case that justified the investment. The programme also defers expenditure on a range of schemes which are not absolutely essential. When the economic environment improves, these schemes will be reviewed to assess whether or not they can be reinstated.

8.11 The Council's Children's Services capital programme includes investment proposals which are designed to directly address essential, immediate health & safety issues in schools which, if they were not undertaken, could lead to school closures.

8.12 The budget also provides for significant investment in our leisure centres, £7.4m over the MTFS period, to bring them back to safe and usable condition. There is also continued investment in the Cycling & Walking Action Plan over the MTFS which is funded by external resources.

8.13 The Wards Corner capital budget still provides for the acquisition of properties under the CPO and to develop the scheme to inform the next phase of investment which is what is required at this stage. The process of land assembly on the Gourley Triangle scheme is continuing with Government funding. The Selby Urban Village scheme is now being delivered in two stages. The first phase focuses on the community centre and sports facilities (which is externally funded), whilst the second phase focuses on the housing element. The second phase will now be delivered through the housing revenue account, rather than the general fund.

8.14 The Council is also investing in its digital offering to bring forward transformation that delivers savings and to ensure that our customers receive the best possible service.

8.15 The Council continues to invest in housing through its new homes programme. This expenditure is contained within the housing revenue account (HRA) and is reported elsewhere.

Background

8.16 Capital expenditure in local government is defined in statute and accounting practices/codes and as such must be complied with. Within these rules, capital budgets and capital expenditure decisions offer the opportunity for the Council to profoundly affect the lives of its residents, businesses, and visitors in both the immediate and the longer term.

8.17 Capital programmes can shape the local environment (e.g., through the provision of new housing, traffic schemes or regeneration schemes); positively impact people's lives (e.g. through creating appropriate housing for adults with learning difficulties or investment in parks and open spaces); transform the way the Council interacts with local residents (e.g. through the libraries investment programme or proposals for locality provision); and deliver fit for purpose schools.

8.18 The key objectives for the Council's capital programme are to ensure that the assets that it has are fit for purpose. To deliver this, the programme is very much focused on addressing health & safety issues first and foremost and to support the corporate delivery plan, deliver the borough plan and assist the Council in meeting the service and financial challenges that it continues to face.

Capital expenditure and financing

8.19 Capital expenditure is where the Council spends money on a project, with the view to derive societal, service and economic benefit from the expenditure, for a period longer than twelve months. This can also include spending on assets owned by other bodies, and loans and grants to other bodies enabling them to buy assets.

8.20 The table below shows a high-level summary of the Council's outline capital spending in the medium-term i.e., for the financial years 2024/25-2028/29, which shows the continued and growing capital investment that is being undertaken to support the achievement of the corporate delivery plan objectives and to improve people's lives.

Table 8.1: Capital expenditure plans overview 2024/25 - 2028/29

	2023/24 Budget (£'000)	2024/25 Budget (£'000)	2025/26 Budget (£'000)	2026/27 Budget (£'000)	2027/28 Budget (£'000)	2028/29 Budget (£'000)	Total (£'000)
Previously Agreed							
General Fund Account (GF)	220,900	200,102	217,103	276,220	93,859		**1,008,184**
Housing Revenue Account (HRA)	262,962	289,102	322,107	305,880	246,218		**1,426,269**
Total =	**483,862**	**489,204**	**539,210**	**582,100**	**340,077**		**2,434,453**
Proposed							
General Fund Account (GF)		144,178	136,781	189,425	56,375	56,701	**583,458**
Housing Revenue Account (HRA)		239,081	304,557	355,849	308,279	210,554	**1,418,321**
Total =		**383,259**	**441,339**	**545,273**	**364,654**	**267,254**	**2,001,779**

8.21 The capital programme is composed of individual directorate programmes. Within these directorate totals there are schemes and within most schemes there are individual projects. For instance, Scheme 302, Borough Roads, will contain individual projects on individual roads.

8.22 About 31% of the capital programme, is composed of schemes that are wholly financed by the Council's borrowing activity and not self-financing or met from external resources. These schemes largely reflect the statutory duties of the council. In large part these schemes are not able to attract external resources to either supplement or supplant Council borrowing as they are core to the Council's operation.

8.23 There are a limited number of schemes within the General Fund capital programme that will only proceed, if they are estimated to result in a net reduction in expenditure. That reduction will include the cost of financing the borrowing and contribute to the MTFS through making savings or increasing income. These schemes are known as self-financing schemes. The decision to proceed with these schemes will follow the production of a detailed business case that supports the investment and identifies reductions in expenditure.

8.24 The Children's Services capital programme is reliant on the Council undertaking external borrowing. For the period 2024/25-2028/29 the Council is planning to spend £54.2m, of which approximately £29.8m is funded through government grant leaving a borrowing and self-funding requirement of £18.5m and £5.9m respectively. The cost of the increased borrowing investment in schools falls on the Council's revenue account through increased borrowing costs.

8.25 The Adults, Health & Communities Services capital programme is £58.0m, of which much of the programme is self-financed at £45.3m. In addition, there is £8.8m of grant funded expenditure.

8.26 Within the Environment & Resident Experience directorate, the proposed capital programme for the period 2024/25-2028/29 is extremely reliant on Council borrowing and broadly estimated at £69.0m of which approximately £53.6m is financed by borrowing, and £13.4m is externally funded.

8.27 The Placemaking & Housing capital programme has an estimated value of £308.5m, of which £211.9m is funded externally and £18.3m is self-financing. Council borrowing in this part of the capital programme is proportionately lower than in other service areas at £78.3m. The majority of this borrowing is to match fund schemes in the South Tottenham Regeneration projects, the Wood Green Regeneration Strategy and to fund the Corporate Landlord remediation works.

8.28 The Culture, Strategy & Engagement capital programme is estimated at £93.8m with the majority, £65.1m funded through self-financing borrowing. £60.9m of this self-financing relates to the Civic Centre refurbishment and £4.2m relates to the Alexandra Palace – Invest to Earn capital works. The balance of expenditure amounting to £28.7m is funded by Council borrowing.

8.29 The inclusion of a scheme within the capital programme is not necessarily permission to spend. Most schemes will be subject to the completion of an approved business case that validates the high-level cost and time estimates contained within the programme. An integral part of the business case will be an assessment of the risks that a project faces and once a project is agreed, the review of the risk register is a standing item on the agenda for the project's governance arrangements.

8.30 Service managers bid annually as part of the Council's budget setting process. The bids are assessed against their response to need in relation to the Council's priorities, the asset management plan and meeting the objectives of the medium-term financial strategy (MTFS). In addition, schemes have been considered for their contribution to economic recovery, to growth, and to jobs.

8.31 The Housing Revenue Account (HRA) is a ring-fenced account, which ensures that the Council's housing activities are not subsidised by the Council's non-housing activities. It also ensures that the Council's non-housing activities are not subsidised by its HRA. HRA capital expenditure is recorded separately.

8.32 The Capital Programme for 2024/25 has considered and been reviewed to ensure that it delivers in line with the Council's Carbon Reduction ambition. There are no projects that will increase the carbon footprint of the Council. There are several projects however, where there is the opportunity that these can be designed to ensure that at the delivery stages Zero Carbon requirements will be delivered. These include:

- Construction works (such as the Parkland Walk Bridge). The procurement for these works will include carbon within the selection for materials and contractors works.

- Road Safety Programme and Highways Maintenance. To deliver transport infrastructure that is safe and supports active travel options.

- School's capital Maintenance – the Council has just completed its Energy Action Plan for its schools, and this capital funding will deliver this through including carbon reduction measures (insulation, glazing, low carbon heating) within these programmes. The budget for the primary school investment is funded through government grant.

- Active and health spaces around our schools - We are continuing the funding for our successful School Streets programme and introducing Healthy Schools Zones to improve air quality in our most polluted schools of the borough. Creating safe space and infrastructure to encourage active travel options.

- The Walking and Cycling Action Plan is continuing and is funded through external sources.

The table below details the proposed capital expenditure plans by directorate.

Table 8.2: Capital expenditure plans by directorate

	2024/25 Budget (£'000)	2025/26 Budget (£'000)	2026/27 Budget (£'000)	2027/28 Budget (£'000)	2028/29 Budget (£'000)	Total (£'000)
Children's Services	23,114	20,820	5,281	5,031	0	**54,245**
Adults, Health & Communities	4,870	5,051	7,377	12,377	28,341	**58,016**
Environment & Resident Experience	20,466	12,708	12,658	14,438	8,688	**68,958**
Placemaking & Housing	53,438	61,261	151,155	22,959	19,672	**308,484**
Culture, Strategy & Engagement	42,290	36,941	12,954	1,570	0	**93,756**
Total General Fund (GF)	**144,178**	**136,781**	**189,425**	**56,375**	**56,701**	**583,458**
Housing (HRA)	**239,081**	**304,557**	**355,849**	**308,279**	**210,554**	**1,418,321**
Overall Total	**383,259**	**441,339**	**545,273**	**364,654**	**267,254**	**2,001,779**

8.33 Appendix 4 includes the previously agreed schemes plus the new schemes:

H is for schemes that are funded by borrowing;
S is for schemes that are funded by the borrowing but where there are compensating savings are made in service budgets;
E is for schemes that are funded by an external party.

Where there is more than one letter, this indicates that the scheme is funded from more than one source with the source contributing the most indicated first.

Appendix 5 provides details of the new schemes. The following paragraphs provide a high-level description of each directorate's new capital proposals.

8.34 Children's Services

There is continued investment in the school estate for immediate health & safety works and continued investment in the safety valve programme to make savings in the dedicated schools grant. The Alternative Provision budget has been deferred pending detailed work on the strategy to support the budget requirement.

8.35 Adult, Health, and Communities

There are no new schemes. The Edwards Drive scheme is now planned to be delivered via the housing delivery programme, funded by the housing revenue account, rather than the general fund. The Bourgoyne Road scheme has been deferred until the GLA grant programme for this type of facility is made available to the Council. There will be a continued 'meanwhile' use on the site.

The supported living scheme has been transferred to be delivered through the housing delivery programme.

8.36 Environment & Resident Experience

The existing Environment & Resident Experience capital programme is designed to make the borough a cleaner and safer place where residents can lead active and healthy lives. The proposed new capital schemes build on these priorities with additional limited investment.

It is proposed to invest £7.436m in the leisure facilities that will address health & safety issues, and essential backlog maintenance requirements to increase usage and reduce carbon emissions.

There is a proposal to increase the amount of investment in the Active Life in Parks and Parks Asset Management. These increases are to ensure that urgent health & safety works are undertaken. In addition, there is additional necessary investment in the Parkland Walk Bridges programme to ensure that the bridges continue to operate safely. The programme also allows for the continuation of investment in street lighting and borough roads in future years to ensure that the highway is safe to use.

8.37 Placemaking & Housing

Within the placemaking and housing programme a number of schemes have been deferred as they were not able to generate a business case that supported the proposed investment. Notwithstanding that the Council is still investing in its assets,

There is continued investment in the Council's assets for the operational buildings to address health & safety issues to enable continued occupation and service delivery. There is investment in the commercial portfolio to ensure compliance with statutory requirements and to protect the Council's income stream through continued lettings.

8.38 Culture, Strategy & Engagement

The proposed capital programme continues the investment needed in the Council's IT assets to drive through transformation to deliver savings whilst at the same time delivering improvements to the resident experience. The Council is also investing in essential works in its 2 principal heritage assets, Bruce Castle Museum and Alexandra Palace.

8.39 Financing

All capital expenditure must be financed from either an external source (government grant or other contributions), the Council's own resources

(revenue, reserves, or capital receipts) or debt (borrowing, leasing, Private Finance Initiative).

8.40 The Council's capital programme has moved to a financing strategy that seeks to ensure that investment via the capital programme is self-financing or funded from external resources wherever possible. The draft capital programme for 2024/25-2028/29 is analysed in the table below and shows that the majority of schemes being proposed (69%) are either self-financing or funded via external resources.

Table 8.3: Financing Strategy

	General Fund Borrowing		External	Total
	Met from General Fund (£'000)	Self Financing met from Savings (£'000)	(£'000)	(£'000)
Children's Services	18,523	5,900	29,822	**54,245**
Adults, Health & Communities	3,882	45,341	8,793	**58,016**
Environment & Resident Experience	53,624	1,959	13,375	**68,958**
Placemaking & Housing	78,310	18,287	211,887	**308,484**
Culture, Strategy & Engagement	28,648	65,108	0	**93,756**
Total	**182,987**	**136,594**	**263,877**	**583,458**

8.41 The self-financing schemes will normally only proceed if they produce a reduction in expenditure that includes reductions enough to cover the cost of financing the investment. This is necessary to ensure that the investment contributes to meeting the financial challenges that the Council faces. It is noted however, that in some limited circumstances, that schemes may proceed even if they do not produce a reduction in expenditure enough to cover the cost of financing the investment.

8.42 As debt needs to be repaid the Council is required by statute to set aside from its revenue account an annual amount sufficient to repay its borrowing. This is known as the minimum revenue provision (MRP). The estimated MRP over the MTFS period is set out below:

Table 8.4: Estimated MRP

	2023/24 Budget (£'000)	2024/25 Budget (£'000)	2025/26 Budget (£'000)	2026/27 Budget (£'000)	2027/28 Budget (£'000)	2028/29 Budget (£'000)
MRP	18,676	17,677	19,002	20,069	20,980	22,306

8.43 The Council's underlying need to borrow to finance its capital programme is measured by the capital financing requirement (CFR). This increases when new debt financed capital expenditure is incurred and reduces when MRP is made. The table below shows the estimated CFR over the MTFS period.

Table 8.5: Prudential Indicator: Estimates of Capital Financing Requirement

	2023/24 Budget (£'000)	2024/25 Budget (£'000)	2025/26 Budget (£'000)	2026/27 Budget (£'000)	2027/28 Budget (£'000)	2028/29 Budget (£'000)
CFR	1,375,493	1,427,202	1,706,665	2,003,734	2,286,562	2,472,311

Asset Management

8.44 The Asset Management Plan will be reported to Cabinet in Spring 2024.

Asset Disposals

8.45 When a capital asset is no longer needed, it may be sold, and the proceeds (known as capital receipts) can be spent on new assets or can be used to repay debt (it should be noted that if the asset includes "open space", any decision on a proposed disposal will be subject to the statutory requirement to advertise and consult before a final decision can be taken and/or implemented). Repayments of grants, loans and non-treasury investments also generate capital receipts. The Council is currently permitted by legislation to spend capital receipts to deliver cost reductions and/or transformation. This is known as the flexible use of capital receipts and this flexibility is currently due to expire on the 31st March 2025. However, there is a proposal to extend this to 2030.

8.46 As stated above, capital receipts can be used to fund capital expenditure or repay debt. The budget assumption is that capital receipts will not fund capital expenditure or debt repayment. It is anticipated that the capital receipts received in the MTFS period covered by the flexibility (up to 31st March 2025) will be used to deliver cost reductions and/or transformation. There is a separate policy statement and schedule of proposed initiatives to utilise capital receipts flexibly.

Treasury Management

8.47 The Council has a Treasury Management Strategy Statement (TMSS) that sets out in detail the Council's approach to managing its cash flows, borrowing

and investment activity, and the associated risks. The Capital Strategy document includes similar information from the TMSS but presents this information in the context of the Council's capital programme and Corporate Delivery Plan.

8.48 Treasury management is the management of the Council's investments, cash flows, its banking and capital market transaction and the effective control of the risks associated with those activities. Surplus cash is invested until required in accordance with the guidelines set out in the approved TMSS, whilst short term liquidity requirements can be met by short term borrowing from other local authorities.

Borrowing Strategy

8.49 The Council's primary objective when borrowing money is to strike a balance between securing low interest cost and achieving certainty of those costs, over the period for which the funds are required.

8.50 Projected levels of the Council's total outstanding external debt (which comprises borrowing, PFI liabilities and leasing) are shown below and compared to the CFR.

Table 8.6: Prudential Indicator: Gross Debt and the Capital Financing Requirement

	31/3/23 Actual (£'000)	31/3/24 Budget (£'000)	31/3/25 Budget (£'000)	31/3/26 Budget (£'000)	31/3/27 Budget (£'000)	31/3/28 Budget (£'000)	31/3/29 Budget (£'000)
Borrowing Debt	783,301	1,204,505	1,087,092	1,346,241	1,623,607	1,885,665	2,049,734
PFI & Lease Debt	21,967	19,471	13,189	10,552	9,852	9,151	8,450
Total Debt	**805,268**	**1,223,976**	**1,100,281**	**1,356,794**	**1,633,459**	**1,894,816**	**2,058,184**
Capital Financing Requirement	1,120,900	1,375,493	1,427,202	1,706,665	2,003,734	2,286,562	2,472,311

8.51 The CFR represents the Council's underlying need to borrow for capital purposes. The Council's strategy is to maintain borrowing and investments below their underlying levels, which is commonly referred to as internal borrowing. The Council has an increasing CFR due to the increasing requirement to finance its capital programmes.

Affordable Borrowing Limit

8.52 The Council is legally obliged to set an affordable borrowing limit (also termed the authorised limit for external debt) each year. In line with statutory guidance,

a lower operational boundary is also set as a warning level should debt approach the limit. This is set out in Table 8.7 below.

Table 8.7: Prudential Indicator: Authorised limit and operational boundary for external debt

	2023/24 Budget (£'000)	2024/25 Budget (£'000)	2025/26 Budget (£'000)	2026/27 Budget (£'000)	2027/28 Budget (£'000)	2028/29 Budget (£'000)
Authorised limit – borrowing	1,286,022	1,344,013	1,626,113	1,923,882	2,207,411	2,393,861
Authorised limit – PFI & leases	25,702	17,410	13,929	13,004	12,079	11,154
Authorised limit – total external debt	**1,311,724**	**1,361,423**	**1,640,042**	**1,936,886**	**2,219,490**	**2,405,015**
Operational boundary - borrowing	1,236,022	1,294,013	1,576,113	1,873,882	2,157,411	2,343,861
Operational boundary – PFI & leases	23,365	15,827	12,663	11,822	10,981	10,140
Operational boundary – total external debt	**1,259,387**	**1,309,840**	**1,588,775**	**1,885,704**	**2,168,392**	**2,354,001**

8.53 Although capital expenditure is not charged directly to the revenue account, interest payable on loans and MRP are charged to revenue, offset by any investment income receivable. The net annual charge is known as financing costs. This is compared to the net revenue stream i.e., the amount funded from Council Tax, business rates and general government grants.

8.54 Table 8.8 below shows the net estimated capital financing costs based on the capital programme and the revised set of assumptions. The table also shows how these forecasts compare to the budget that is currently built into the MTFS plan.

Table 8.8: Estimated Capital Financing Costs

	2023/24 Budget (£'000)	2024/25 Budget (£'000)	2025/26 Budget (£'000)	2026/27 Budget (£'000)	2027/28 Budget (£'000)	2028/29 Budget (£'000)

MRP - pre 2008 expenditure	5,019	5,019	5,019	5,019	5,019	5,019
MRP - post 2008 expenditure	13,657	12,657	13,983	15,050	15,961	17,287
Total MRP	**18,676**	**17,677**	**19,002**	**20,069**	**20,980**	**22,306**
Interest Costs (General Fund)	16,946	14,996	21,319	22,943	24,438	25,626
Total Gross Capital Financing Costs (GF)	**35,622**	**32,672**	**40,321**	**43,012**	**45,418**	**47,932**
Offsetting Savings for self financing schemes	(12,714)	(1,119)	(2,743)	(3,724)	(4,235)	(5,152)
Total Net Capital Financing Costs (GF)	**22,908**	**31,553**	**37,579**	**39,289**	**41,183**	**42,781**
Interest Costs (HRA)	**18,589**	**25,889**	**35,987**	**48,297**	**60,785**	**69,562**

Table 8.9: Proportion of financing costs to net revenue stream

	2023/24 Budget	2024/25 Budget	2025/26 Budget	2026/27 Budget	2027/28 Budget	2028/29 Budget
	£'000	£'000	£'000	£'000	£'000	£'000
Financing Costs General Fund	35,622	32,672	40,321	43,012	45,418	47,932
Proportion of net revenue stream	12.36%	11.11%	13.45%	14.06%	14.56%	15.06%
Financing Costs HRA	18,589	25,889	35,987	48,297	60,785	69,562
Proportion of net revenue stream	16.41%	19.00%	24.32%	30.52%	36.11%	39.32%

8.55 Over the MTFS period the General Fund proportion of financing costs to net revenue stream ratio shows modest increases. These are primarily driven by the expected higher costs of new long-term borrowing that the Council will need to undertake over the MTFS. The ratio also shows significant increases for the HRA over the MTFS. However, these increases have been modelled

into the current version of the evolving HRA business plan and capital programme.

Governance

8.56 Decisions on treasury management investment and borrowing are made on a daily basis and are delegated to the Director of Finance. There is a further sub-delegation to members of the Director of Finance's staff to facilitate day-to-day operations. Whoever is making the decision(s) is required to act in line with the treasury management strategy as approved by full Council.

9. Housing Revenue Account (HRA)

The HRA is the Council's record of the income and revenue expenditure relating to council housing and related services. Under the Local Government and Housing Act 1989, the HRA is ring-fenced and cannot be subsidised by increases in council tax. Equally, any surplus in the HRA or balances held in reserves cannot be transferred to the General Fund. Since April 2012, the HRA has been self-financing. Under self-financing Councils retain all the money they receive from rent and use it to manage and maintain their homes.

HRA Financial Plan Overview

9.1 The 30-year HRA financial plan contains a long-term assessment of the need for investment in assets, such as new homes development, existing homes acquisition, major works, and other cyclical maintenance requirements, as well as forecasts on income streams such as rents, in line with rent standards, and future developments.

9.2 The Plan includes the modelling of the revenue and capital implications of all planned work in the HRA to deliver council priorities and provides the basis for understanding the affordability of current capital programme delivery plans and assessing options to ensure a viable HRA over a longer period. It considers the build costs, inflation, exposure to housing market volatility and delivery capacity within the Council.

9.3 The increases in energy costs, inflation and interest rates rises presents a level of challenge and difficulty in delivering our capital programmes now and the viability of our HRA in the medium to long-term. The Council must agree a HRA Budget and longer-term plan which is prudent and sustainable. This plan factors in our best estimates and assumptions on interest rates and inflation, which are particularly significant for our capital programme.

9.4 The plan recognises that to undertake the proposed extensive development programme, the HRA must be viable now and in the future. It also recognises that there will be ongoing gateway reviews to update and test viability before future programme phases are released. One of the measures of viability of the HRA is the annual revenue contribution to capital outlay (RCCO), which reduces the need for external borrowing. RCCO is the revenue surplus after expenditure; and it is key in assessing the HRA resilience. The financial plan

has a target of an ongoing £8m minimum annual surplus (though in this MTFS period that is forecast to not be possible for all years). This is to provide an appropriate level of in-year financial cover, in recognition of the risks such as changes in government policies, operational factors and those associated with an extensive development programme. The plan also assumes a year on year working balance of £20m. This increased position was established at the end of 2021/22.

9.5 In the current iteration of the financial plan, the revenue surplus is forecast at above £8m in 2024/25 and 2025/26, with surplus in the subsequent 3 years but below the £8m level, before being forecast to increase again in later years. Any unanticipated event with financial implications in those years will be managed through a call on the working balance, which is forecasted to be replenished in future years.

9.6 **The main sources of income to the HRA are Rents and Service Charges.**

9.7 **Housing rents**

9.8 The Council is required to set the rent increases in council-owned homes every year but there are strict limits for existing tenants. From 2020/21, the government has permitted Local Authorities in England to increase existing tenants' rents by no more than the Consumer Price Index (CPI), at September of the previous year, plus 1%.

9.9 On 17 November 2022, the government announced in the Autumn Statement 2022 that social housing rent increases for 2023/24 would not go up in line with the formula, instead will be capped at 7%, to help tenants with the increased cost of living.

9.10 In 2024/25, rents will increase by September CPI + 1% in line with Government guidance.

9.11 **Rents in Existing Council Homes - General Needs & Sheltered/Supported Housing**

9.12 Central Government, through the Regulator of Social Housing, prescribes the formula for both calculating social housing rents in new tenancies and the rate at which existing social rents are able to increase in each year.

9.13 The rental increase is set at September CPI plus 1%. In 2023/4 the CPI+1% rent increase would have been 11.1% however the rent increase was restricted at 7% by Central Government. In 2024/25 there is no such restriction. Therefore, the proposed rents increase in 2024/25 of 7.7% is based on September CPI of 6.7% plus 1%.

9.14 On this basis, the proposed average weekly rents for general needs and sheltered/supported housing will increase by £9.10 from £118.22 to £127.33 in 2024/25. There is a range of rents across different sizes of properties. The

table below sets out the proposed average weekly rents by property size based on the rent increase of 7.7% for 2024/25 with effect from 1st April 2024 (the first Monday in April).

Table 9.1: Proposed Average Weekly Rent 2024/25

Number of Bedrooms	Number of Properties	Current average weekly rent 2023/24	Proposed average weekly rent 2024/25	Proposed average rent increase	Proposed percentage increase
Bedsit	130	£95.91	£103.30	£7.39	7.7%
1	5,260	£101.59	£109.41	£7.82	7.7%
2	5,133	£118.40	£127.52	£9.12	7.7%
3	3,687	£135.57	£146.01	£10.44	7.7%
4	607	£154.35	£166.23	£11.88	7.7%
5	110	£180.56	£194.46	£13.90	7.7%
6	15	£187.64	£202.09	£14.45	7.7%
7	2	£177.55	£191.22	£13.67	7.7%
All dwellings	**14,944**	**£118.22**	**£127.33**	**£9.10**	**7.7%**

9.15 **Formula rent and Rent Caps**

9.16 The national formula for setting social rent is intended to enable Local Authorities to set rents at a level that allows them to meet their obligations to their tenants, maintain their stock (to at least Decent Homes Standard) and continue to operate a financially viable HRA, including meeting their borrowing commitments.

9.17 The formula is complex and uses national average rent, relative average local earning, relative local property value, and the number of bedrooms to calculate the formula rent.

9.18 Formula rents are subject to a national social rent cap. The rent cap is the maximum level to which rents can be increased to in any one financial year, based on the size of the property. Where the formula rent would be higher than the rent cap for a particular property, the national social rent cap must be used instead. Rent caps for 2024/25 are as shown below:

Table 9.2: 2024/25 Bedroom Rent Caps

Number of Bedrooms	2024/25 Rent Cap
1 and bedsits	**£188.04**
2	**£199.08**

3	**£210.15**
4	**£221.19**
5	**£232.26**
6 or more	**£243.31**

9.19 **Rents on New Tenancies**

9.20 Rents for new tenancies are set according to a formula (hence the term 'formula rent'). This is for new tenancies in either a relet of an existing council home, or a newly built council home.

9.21 The Policy statement on rents for social housing also includes provision for social landlords to apply a 5% flexibility on formula rents: '*The government's policy recognises that registered providers should have some discretion over the rent set for individual properties, to take account of local factors and concerns, in consultation with tenants. As a result, the policy contains flexibility for registered providers to set rents at up to 5% above formula rent (10% for supported housing – as defined in paragraphs 2.39-2.40 below). If applying this flexibility, providers should ensure that there is a clear rationale for doing so which takes into account local circumstances and affordability*.'

9.22 The current financial climate – with high inflation rates and high interest rates – means that the Council cannot continue to meet its obligations to its tenants by investing in its stock, ensure that all homes meet at least the decent homes standard, ensure that homes meet the council's sustainability objectives and ensure homes are warm and cheaper to heat for tenants while still setting a balanced HRA. On this basis, the 2024-2029 HRA MTFS proposes applying the 5% flexibility to formula rents.

9.23 This would not supersede any commitments on future rent levels – for example as set out in the landlord offer for new homes at Broadwater Farm and High Road West. It would also not apply to any homes that are being delivered at London Affordable Rent. And this could not affect rents on existing tenancies which can only rise by CPI+1%.

9.24 Rents on new builds (apart from the categories mentioned above) and rents for re-lets of existing Council Homes are proposed to be set at formula rent plus 5% flexibility (subject to national rent cap).

9.25 **London Affordable Rent**

9.26 London Affordable Rent was introduced by the Mayor of London in 2016 as a social housing product for new affordable homes funded by Building Council Homes for Londoners (BCHFL) grant. It reflects the 2015/16 formula rent cap uprated by CPI plus one per cent every year. These LAR rents are at the same level anywhere in London. LAR homes are let by councils on secure tenancies, and by other registered providers.

9.27 The BCHFL grant programme allocated grant on the basis that homes for low-cost rent would be let at London Affordable Rent (LAR) rather than formula rent. The historically relatively low level of grant – a flat rate of £100,000 per unit – reflected that expectation.

9.28 In the 2023/24 HRA MTFS it was agreed to let homes built as part of the GLA's 2016-2021 programme at LAR.

9.29 The table below shows London Affordable Rents for 2024/25. This represents an uplift on 2023/24 LAR Rents by September CPI plus 1%.

9.30 **Table 9.3: 2024/25 LAR**

Number of Bedrooms	2024/25 LAR
1 and bedsits	£201.43
2	£213.26
3	£225.10
4	£236.95
5	£248.80
6 or more	£260.63

9.31 **Rents in Temporary Accommodation**

9.32 All properties purchased since 1 April 2019 for housing homeless households, which are held in the HRA, are leased to Haringey Community Benefit Society (HCBS) and let by HCBS at Local Housing Allowance (LHA) rent levels.

9.33 The HRA financial plan includes these rental incomes for a maximum period of seven (7) years from the time of acquisition. From year eight (8), it recognises incomes from these properties at formula rent, with the normal annual rent increases of CPI, as these properties are assumed will revert to the HRA after 7 years of lease.

9.34 From 1st April 2024, all other council-owned properties, in the HRA, used as temporary accommodation under a Council non-secure tenancy will have proposed rent increases of 7.7% (CPI + 1%).

9.35 **Shared Ownership Rents**

9.36 There are a small number of shared ownership properties in the HRA, and their rents are to be increased in line with their contracts, typically January RPI +0.5%. The Government have recently announced that for new shared ownership properties the rents are to be increased by CPI +1%.

9.37 **Tenants' Service Charges**

9.38 In addition to rents, tenants pay charges for services they receive which are not covered by the rent.

9.39 Service charges must be set at a level that recovers the cost of the service, and no more than this. Charges are calculated by dividing the budgeted cost of providing the service to tenants by the number of tenants receiving the service. Therefore, a flat rate is charged to tenants receiving each service and the weekly amount is fixed. The amount tenants pay increases where the cost of providing the service is anticipated to increase. Equally, charges are reduced when the cost of providing the service reduces or where there has been an over-recovery in the previous year.

9.40 In the past years, service charges have been capped at CPI plus 1% increases, apart from last year where service charges were generally capped at 10% instead of 11.1% (CPI plus 1%) and most energy related service charges were capped at 75% of the cost.

9.41 This approach was taken to ensure that rises in rent and service charges were consistent. In the event that this rise meant that the council would have recovered more than the cost of providing that service, service charges were capped to ensure that no more than this was recouped.

9.42 This is in line with guidance in the rent standard – which sets out that registered providers should endeavour to keep increases for service charges within the limit on rent changes, of September CPI +1%. However, the overarching service charging principle is for an authority to recover the cost of the service, and no more than this.

9.43 Service charges are covered by housing benefit and Universal Credit, so any tenant in receipt of these benefits will have these costs covered.

9.44 Having increased service charges on the above basis for a number of years, it is proposed in 2024/25 that we revert to full cost recovery service charges. The services tenants currently pay for are listed below:

- Concierge
- Grounds maintenance
- Caretaking
- Street sweeping (Waste collection)
- Estates road maintenance
- Light and power (Communal lighting)
- TV aerial maintenance
- Door entry system maintenance
- Sheltered housing cleaning service
- Good neighbour cleaning service

- Window cleaning service.
- Converted properties cleaning
- Heating

9.45 Tenants living in sheltered and supported housing also pay the following additional support charges:

- Sheltered Housing Charge
- Good Neighbour Charge
- Additional Good Neighbour Charge

9.46 The applicable charges proposed for 2024/25 is as shown in the table below:

Table 9.4 – Proposed Tenants' Service Charges with effect from 1st April 2024 (2024/25)

Tenants' Service Charges	Current Weekly Charge 2023/24	Proposed Weekly Charge 2024/25	Increase / Decrease	
Property Charges :				
Concierge	£20.28	£26.62	£6.34	31%
Grounds Maintenance	£3.40	£3.47	£0.07	2%
Caretaking	£5.19	£7.62	£2.43	47%
Street Sweeping	£5.98	£8.57	£2.59	43%
Estates Road maintenance	£0.68	£0.77	£0.09	13%
Communal Lighting (Light & Power)	£5.57	£4.04	-£1.53	-27%
TV aerial maintenance	£0.38	£0.41	£0.03	9%
Door entry system maintenance	£1.03	£1.11	£0.08	8%
Sheltered housing cleaning service	£2.13	£2.48	£0.35	16%
Good neighbour cleaning service	£1.51	£1.76	£0.25	17%
Window cleaning	£0.63	£0.67	£0.04	6%
Converted properties cleaning	£2.05	£3.93	£1.88	92%
Sheltered Housing Blocks Heating	£19.31	£18.33	-£0.98	-5%
Garton House / Lowry House Heating	£15.78	£15.33	-£0.45	-3%
Ferry Lane Estate / Runcorn Heating	£23.46	£21.83	-£1.63	-7%
Rosa Luxemburg - District Heating 8	£9.56	£7.14	-£2.42	-25%
William Atkinson House Heating	£20.60	£19.45	-£1.15	-6%
Broadwater Farm DEN Heating	£22.49	£21.11	-£1.38	-6%
Welbourne (Walter Tull House) DEN Heating	£11.45	£8.54	-£2.91	-25%
Support Charges :				
Sheltered Housing Charge	£32.38	£33.40	£1.02	3%
Good Neighbour Charge	£14.47	£14.93	£0.46	3%
Good Neighbour Charge (Stokley Court)	£17.62	£18.17	£0.55	3%

9.47 **Heating charges**

9.48 The heating charges reflect the projected usage in the blocks and projected energy rates for 2024/25. To protect tenants from a sharp increase some of the approved 2023/24 heating charges included a 25% discount. In 2024/25 no equivalent discount has been applied as the proposed charges are based on full cost recovery, However the current intelligence from the Council's energy supplier (Laser) is that costs in 2024/25 are expected to be approximately 26% lower than costs in 2023/24 and this has been reflected in the proposed charges in the table above.

9.49 Broadwater Farm and Welbourne heating charges are included as an indication of the average weekly cost as both sites are expected to have metered charges from the latter part of 2023/24.

9.50 Where properties are on metered heating, the charges will be based on usage for each property and proposed tariffs as detailed in the table below.

Table 9.5 – Proposed Metered Tariffs with effect from 1st April 2024 (2024/25)

Metered blocks (same tariff applies to all sites)	Current Tariff 2023/24	Proposed Tariff 2024/25	Increase / Decrease	
Weekly standing charge (£/wk)	£3.65	£3.65	£0.00	0%
Price per unit of heat (pence/kWh)	8.01p	7.90p	-0.11p	-1%

9.51 **Rent Consultation**

9.52 As part of the budget consultation, tenants will be given the opportunity to express their views on the adoption of rent flexibility for new tenancies. There is no requirement for tenant consultation on existing rents, service charge increases or charges for facilities (such as heating) (but there is a duty to notify tenants of such increases once a decision has been made). Haringey Council's rents are set in accordance with government rent standard and no new charges are being introduced for the tenants' service charges. Tenants must be given at least four weeks' notice before the new rents and service charges for 2024/25 start on 1st April 2024.

9.53 **HRA Tenants Support Fund**

9.54 Recognising the impact that service charge increases in this report may have on HRA tenants, it is recommended that a new support fund is established. The form of support to be provided from this fund will be addressed in a separate report with the decision making delegated to the Director of Housing & Place following consultation with the Cabinet Member for Housing services, Private renters, and Planning. It is proposed that this be funded from the £20m HRA working balance and the replenishment of the working balance to its full level be redressed in the subsequent periods.

9.55 **HRA Expenditure**

9.56 Significant items of expenditure in the HRA include the management cost (£30.5m), repairs cost (£27m), capital financing charge (£25.2m) and depreciation (£22.6m). These four items constitute 77% (£105m) of the total HRA expenditure (£136m) in 2024/25. The capital financing charge is the interest on HRA loans and internal funding and is budgeted at £7m above the 2023/24 level due to higher interest rate forecast for next year's potential borrowings. Depreciation is a cash charge to the HRA to reflect the need to finance the replacement of components within HRA homes over time. The depreciation charges to the HRA are transferred into the Major

Repairs Reserve (MRR). The Major Repairs Reserve is used to build up capital sums that can be used to finance the capital programme.

9.57 The proposed HRA capital programme supports the delivery of over £2bn investment in our existing stock over the next 30 years, and the delivery of over 3,000 new council homes by March 2031.

9.58 There are of course risks such as the impact of the current inflation and interest rate rises on collection of rent, capacity to build, and overall sustainability of the HRA. However, these risks have been factored into this iteration of the HRA budget/MTFS. The budget/MTFS forecasts revenue contribution to capital outlay (RCCO) above the set minimum of £8m in 2024/25 and 2025/26. The RCCO falls below this level in the last three periods of the MTFS and bounces back, after this period. The financial plan recognises the management of the risks in those periods via the use of working balance which currently stands at £20m.

9.59 **HRA 5 Years MTFS (2024/25-2028/29)**

9.60 This report sets out the proposed HRA 5 years Budget/MTFS in the Table below. It accommodates the scale of development presently assumed within the business and financial planning in terms of its impact of the future years HRA revenue position. It also takes into consideration the current inflation and interest rates and its impact in next year's rent charges. The HRA budget for 2024/25 is a balanced budget with a revenue contribution to capital (RCCO) of £8.6m.

9.61 The table below shows the HRA 5-Year Revenue Budget (2024/25 – 2008/29)

Table 9.6 – HRA 5-Year Revenue Budget (2024/25 – 2028/29)

Housing Revenue Account (HRA)	Year 1	Year 2	Year 3	Year 4	Year 5	Total
Income & Expenditure	**2024-25**	**2025-26**	**2026-27**	**2027-28**	**2028-29**	**5 Years**
	£'000	£'000	£'000	£'000	£'000	**£'000**
Housing Revenue Account (HRA)	Year 1	Year 2	Year 3	Year 4	Year 5	**Total**
Income & Expenditure	**2024-25**	**2025-26**	**2026-27**	**2027-28**	**2028-29**	**5 Years**
	£'000	£'000	£'000	£'000	£'000	**£'000**
Income						
Dwellings Rent Income	(109,359)	(119,027)	(128,185)	(137,644)	(146,029)	**(640,244)**
Void Loss	2,071	1,190	1,282	1,376	1,460	**7,379**
Hostel Rent Income	(1,932)	(1,990)	(2,050)	(2,112)	(2,176)	**(10,260)**
Service Charge Income	(17,095)	(17,902)	(18,791)	(19,687)	(20,592)	**(94,067)**
Leaseholder Income	(8,341)	(8,577)	(8,820)	(9,068)	(9,323)	**(44,129)**
Other Income (Garages /Aerials/Interest)	(1,738)	(1,826)	(2,189)	(2,233)	(2,278)	**(10,264)**
Total Income	**(136,394)**	**(148,132)**	**(158,753)**	**(169,368)**	**(178,938)**	**(791,585)**
Expenditure						
Repairs	27,060	26,553	27,085	25,218	23,264	**129,180**
Housing Management	28,605	30,012	29,552	30,163	31,786	**150,117**
Housing Demand	1,879	1,879	1,879	1,879	1,879	**9,395**
Estates Costs (Managed)	13,440	13,709	13,983	14,263	14,548	**69,943**
Provision for Bad Debts (Tenants)	3,019	1,199	1,281	1,365	1,441	**8,305**
Provision for Bad Debts (Leaseholders)	200	206	212	218	224	**1,060**
Other Costs (GF Services)	3,564	3,635	3,708	3,782	3,857	**18,546**
Other Costs (Property/Insurance)	2,148	2,191	2,234	2,279	2,325	**11,176**
Capital Financing Costs	25,280	35,057	47,403	59,894	68,630	**236,264**
Contribution to Major Repairs (Depreciation)	22,597	23,669	24,839	26,025	27,229	**124,359**
Revenue Contributions to Capital	**8,603**	**10,023**	**6,577**	**4,282**	**3,754**	**33,239**
Total Expenditure	**136,394**	**148,132**	**158,753**	**169,368**	**178,938**	**791,585**

9.62 The RCCO in 2024/25 and 2025/26 is more than our locally set minimum of £8m, however for the remaining 3 years it is below £8m. It is clear that our HRA position remains tight and will require close monitoring of our ongoing income and expenditure positions.

9.63 **HRA 5 Years Capital Programme (2024/25 – 2028/29)**

9.64 This represents the capital implications of the new HRA financial plan where there is a strong emphasis on meeting the needs of homeless households while ensuring that the needs of the existing stock are met. It also focuses on the delivery of new homes, renewal of BWF estate, carbon reduction in existing stock, and fire safety of the entire stock.

9.65 The HRA MTFS is geared towards maximising the use of other available resources and use of borrowing as last resort, while maintaining a working balance of £20m. The MTFS capital programme funding assumes a mix of

grant funding, S106 monies, revenue contribution and prudential borrowing. The total capital investment in 2024/25 is £239m, fully funded from grants, Major Repairs Reserve, revenue contributions, RTB retained capital receipts, leaseholder contributions and borrowing.

Table 9.7 - HRA 5 Year Capital Programme (2024/25 – 2028/29)

Housing Revenue Account (HRA)	Year 1	Year 2	Year 3	Year 4	Year 5	**Total**
Investment & Financing	**2024-25**	**2025-26**	**2026-27**	**2027-28**	**2028-29**	**5 Years**
	£'000	£'000	£'000	£'000	£'000	**£'000**
Capital Investment						
Major Works Programme	36,437	45,676	76,683	83,000	66,635	**308,431**
Carbon Reduction Works (Affordable Energy)	3,503	6,893	11,500	13,533	6,757	**42,186**
Fire Safety Works	7,879	8,041	8,366	7,460	5,631	**37,377**
Broadwater Farm Works (BWF)	16,213	19,713	17,575	16,975	16,974	**87,450**
Total Existing Stock Investment	**64,032**	**80,323**	**114,124**	**120,968**	**95,997**	**475,444**
New Homes Build Programme	101,926	115,570	107,819	94,156	78,122	**497,592**
New Homes Acquisitions	33,540	17,395	22,494	14,734	2,658	**90,820**
High Road West (HRW)	2,064	19,053	36,644	36,260	11,082	**105,104**
Broadwater Farm (BWF) New Build	21,944	56,486	58,565	25,473	5,505	**167,972**
Existing Homes Acquisitions - TA	15,575	15,731	16,203	16,689	17,190	**81,388**
Total Capital Investment	**239,081**	**304,557**	**355,849**	**308,279**	**210,555**	**1,418,321**
Capital Investment Financing						
Grants (GLA)	44,805	46,167	56,412	14,696	35,596	**197,676**
Major Repairs Reserve	22,597	23,669	24,839	26,025	27,229	**124,359**
Revenue Contributions	5,482	10,023	6,579	4,283	3,753	**30,120**
RTB Capital Receipts	6,858	7,273	7,472	7,737	8,010	**37,350**
Leaseholder Contributions to Major Works	8,289	7,890	6,548	6,832	7,104	**36,663**
Market Sales Receipts	4,717	1,348	1,613	1,482	15,450	**24,610**
Borrowing	146,333	208,187	252,386	247,224	113,413	**967,543**
Total Capital Financing	**239,081**	**304,557**	**355,849**	**308,279**	**210,555**	**1,418,321**

9.66 The Council continues to project an expensive HRA capital programme both in terms of investing in its existing stock and new build. The financial sustainability of this is addressed in our revenue modelling reported above.

9.67 This MTFS proposes increases in major works, carbon reduction, fire safety budget – to meet current regulatory requirements (Building Safety & Fire Safety legislation), reach 100% Decent Homes standard, following self-referral.

9.68 **Major Works**

9.69 The Council's new Housing Asset Management Strategy sets out the Council's target to achieve 100% decent homes, and how this will be achieved.

9.70 In July 2022, Cabinet agreed to go out to tender to work with partners to deliver these works for the long term, through a Partnering Contract. This

Partnering Contract would run for ten years and will be divided into four separate contracts over four geographical areas. Works under the Partnering Contract are expected to start in late 2024. The proposed Partnering Contract has been designed to deliver value for money; ensure that the Council's objectives to meet decent homes, as well as the other workstreams listed below, are met; contribute to wider corporate priorities in particular to bring good quality jobs and training opportunities to Haringey residents; and finally to ensure that those who are awarded large contracts by the Council are committed to Haringey and the success of the borough for the longer-term. The costs in this proposed capital programme budget recognises the estimated cost of the partnering contract.

9.71 **Carbon Reduction Works**

9.72 The budget provision would support extensive measures contained in the Council energy action plan. Despite the challenging economic circumstances, the Council is proposing an increase of £9m in the expenditure on carbon reduction works over the MTFS period.

9.73 The Council's Energy Action Plan sets out how it will deliver the objectives of both the Climate Change Action Plan and the Affordable Energy Strategy. These are to reduce carbon emissions from the Council's housing stock so that the whole stock reaches an average EPC of B by 2035; and A by 2041, where technically feasible. In turn this will contribute to the objective to minimise energy costs for Council tenants and reduce fuel poverty, especially in a time of rising costs.

9.74 The proposed approach is to firstly improve the fabric of the property. This means upgrading, where necessary, walls, roofs, windows, floors, and doors so as the reduce the need to expend energy to heat homes. The next stage is to incorporate low and zero-carbon heat and power. The worst performing homes will be targeted first. Works will be incorporated with the major works programme to minimise cost to the HRA and disruption to residents. The proposed HRA capital budget supports these works, but external funding is also sought whenever applicable.

9.75 **Fire Safety Works**

9.76 The proposed budget/MTFS is to ensure that all housing stock continues to meet changing statutory requirements. The budget has been refreshed and additional investment of £2m is proposed over the MTFS period; to ensure that the requirement of the recent Fire Safety (England) Regulations 2022 are met. The programme includes front entrance door replacements, window infill panel replacements, Automatic Fire Detection (AFD) to street properties, automatic Fire detection and compartmentation works to timber clad buildings, Intrusive Fire Risk Assessments (FRA) and follow up works.

9.77 **Broadwater Farm Works**

9.78 The council is setting aside significant capital expenditure for the regeneration of the Broadwater Farm estate and has reprofiled expenditure in line with our latest estimates. This reprofiling means a proposed additional £3.6m expenditure over the MTFS period. The identified

structural faults with a number of buildings led to the development of comprehensive programme of improvement. This programme includes:

- The construction of 294 new homes, all at council rent, with 30% family sized units with three beds or more (contained in the new homes budget, below)
- The refurbishment of 800 homes, covering sustainability, fire safety and mechanical and electrical
- Improvements to the public realm and green spaces, tackling the legacies of the 'streets in the sky' design from the 1960s

9.79 **New Homes Build and Acquisition**

9.80 This Financial plan continues to provide for financial resources to meet the Council's commitment to the delivery of high-quality Council homes. This is an integral part of the Council's core HRA business, with a delivery programme that is viable in the long term. The total estimated cost of new build homes and acquisition in the financial plan is £861m over the period of the MTFS.

9.81 Over the past five years, the Council has established a housing delivery programme that is committed to delivering 3,000 new council homes for council rent by 2031. These are the first new council homes in Haringey for forty years.

9.82 The Housing Delivery Programme currently includes over 2000 homes that have been completed started on site. 199 new council homes have been completed and let.

9.83 The new homes are designed through an iterative process of consultation and engagement with Members, planners, and the community.

9.84 Clear, explicit design principles mean that these homes will have the highest standards of design quality – so that homes are beautiful, but also safe, comfortable, and accessible. They will also be easy and affordable to look after – for the Council and for the tenant.

9.85 Climate change, carbon management, and sustainability is integral to the design of our new generation of Council homes. The Council targets zero-carbon for each of our developments.

9.86 More than 10% of new homes are fully wheelchair accessible, with a target of 20%. As part of the programme, through the Bespoke Homes programme we are actively identifying households on the housing register with specific accessibility needs in order to design new homes for their individual needs.

9.87 The need for genuinely affordable homes in Haringey – as across the country – is urgent. More than 12,500 households are currently on the Council's housing register.

9.88 Cabinet has so far included 80 sites of Council land with potential for development in the programme. Most are held in the HRA; others are in the General Fund and will need to be appropriated at cost into the HRA. Where such land includes “open space”, prior to a final decision to appropriate the land into the HRA, there will be a need to advertise and consult.

9.89 Sites in the HRA are underused land, generally on housing estates, typically garages, car parking spaces, or land between existing blocks. General Fund land ranges from the conversion of former shops into homes to large sites such as the former waste management depot at Ashley Road.

9.90 As an integral part of the programme, the Council also actively seeks opportunities to acquire homes to let as Council homes.

9.91 **Existing Homes Acquisitions – Temporary Accommodation (TA)**

9.92 The Council’s TA acquisition programme is based on the purchase of homes and subsequent leasing to the Haringey Community Benefit Society (‘the CBS’) to provide housing to households in housing need nominated to it by Haringey Council. This scheme will generate adequate rental income to cover the cost of capital and associated cost. There is also a General Fund (GF) saving generated by the provision of homes to homeless households in the HRA via reduction in the use of privately-owned temporary accommodation in GF. This Financial plan has a reduced allocation over the MTFS period for this scheme compared to prior years. This is because of the restriction the new guidance on use of RTB retained receipts has placed on the Council’s ability to use these receipts for the purpose of acquiring existing homes. The new guidance means that the Council has a capped number of acquisitions in any year. The RTB retained receipts is now being applied to new build homes to match the acquisitions.

10. Dedicated Schools Budget (DSB)

10.1 Schools budgets are substantially funded from the ring-fenced Dedicated Schools Grant and two other funding streams (Pupil Premium and Post 16 Grant) which are, in effect, passported to schools. Spending must be consistent with the requirements of the prevailing schools and early years funding regulations. There are requirements for Schools Forum to act as a decision-making and/or a consultative role in determining budget levels for each year.

10.2 The financial position reported at Quarter 2 2023/24 sets out the forecast year end position. The accumulated deficit on the High Needs Block has benefited from Safety Valve Funding of £11.99m received in 2022/23. As a result, the opening deficit is £11.55m. The report highlights the in year budget pressures in the High Needs Block which is estimated to add an additional £2.5m to the existing deficit of £11.55m to give a forecast deficit of £14.05m by the end of 2023/24. Further Safety Valve Funding of £2.99m is expected in year bringing the forecast closing position down to £11.04m. The in year forecast deficit is in line with the Safety Valve Agreement and overall, on target to bring the High Needs Block into balance by 2027/28.

10.3 Table 10.1 below sets out Haringey's Dedicated Schools Grant allocations for 2022/23, the minimum rebased DSG baseline allocation for 2023/24 and the National Funding Formula (NFF) allocation for 2024/25 that was published 19th December 2023.

Table 10.1 Haringey's Dedicated Schools Grant Allocation

DSG Block Allocations	Schools Block £m	High Needs Block £m	Central Schools Services Block £m	Early Years Block £m	Total DSG Allocation £m	Recoupment £m	Total DSG Received by Haringey £m	Outside Grants Rolled into Schools Block £m
2022/23	212.52	52.21	2.79	20.25	287.77	-79.11	208.66	0.00
2023/24	219.47	56.79	2.71	21.22	300.19	-84.78	215.41	5.78
2024/25 (published)	225.78	58.12	2.63	31.40	317.93	-83.89	234.04	7.12
								12.90

Mainstream Schools Supplementary Grant (MSSG) 2023/24 and Mainstream School Additional Grant (MSAG) 2024/25 rolled into Schools Block

10.4 Overall, Haringey's NFF allocation for 2024/25 is an increase of 8.6% excluding rolled in grants equivalent to £7.12m. This is based on the December 2023 published allocations and will change during the year due to Early Years Block indicative allocation based upon 2023/24 census and in year recoupment.

- Schools Block - uplift of 0.48% equivalent to £1.02m but rolled in grant of £7.12m.
- Central School Services Block - has lost –2.9% equivalent to £0.08m.
- Early Years Block – uplift of 48% equivalent to £10.18m but estimated based on 23/24 census, also includes new funding to be passported to providers for nursery placements for children aged under 2 years old.
- High Needs Block – uplift of 2.3% equivalent to £1.32m.

10.5 The actual financial position for the Dedicated Schools Grant is dependent on the final school's finance settlement for 2024/25, and updated Early Years Block census which is usually in July 2024.

10.6 The DfE have consulted on the implementation of the direct National Funding Formula from 2024-25, which allows the Secretary of State to determine Schools funding allocations directly. The Council supports a funding system that continues to enable local discretion on the allocation of schools funding so that decisions being made are more responsive to the needs of schools.

10.7 The Haringey Schools Forum noted the DSG funding allocations at their January 2024 meeting and approved the consultation outcome on the formula to distribute the schools block for devolved school budgets subject to approval by the Education Skills and Funding Agency (ESFA).

DSG Reserves

10.8 The DSG reserves now account for Safety Valve funding of £11.99m applied to the 2022/23 position and a further funding expected to be received in 2023/24 of £2.99m to improve the forecast closing position to £11.04m.

Table 10.2 2023/24 Year End DSG reserves forecast

DSG Blocks	Opening DSG deficit at 01/04/2023	Q2 2023/24 Forecast	Safety Valve Funding	Forecast closing DSG deficit 2023/24
	£m	£m	£m	£m
School Block	0	0	0	0
Central School Services Block	0	0	0	0
Early Years Block	0	0.02	0	0.02
High Needs Block	-11.55	-2.50	2.99	-11.06
Total DSG	**-11.55**	**-2.48**	**2.99**	**-11.04**

10.9 After the successful bid to join the Safety Vale Programme approved by DfE in March 2023. The Safety Valve Plan is currently on track in year one of the program with regular quarterly reporting to the DfE prior to receipt of the in-year funding. Workstreams on the delivery to bring the DSG deficit into a balanced position by 2027/28.

10.10 Successful delivery and progress in line with the DSG Management Plan would result in funding being released by DfE to support the reduction deficit and bringing the High Needs Block into a balance by 2027/28. The planned funding profile is as follows:

Year	£m
2022-23	11.96
2023-24	2.99
2024-25	2.99
2025-26	2.99
2026-27	2.99
2027-28	5.98

11. **Consultation & Scrutiny**

11.1 The Council, as part of the process by which it sets its budget, seeks the views and opinions of residents, businesses, tenants and service users which is used to inform the final decision of the Council when setting the budget.

Public Consultation

11.2 As such a formal consultation has taken place on the proposals included in the December draft Budget/MTFS report which included businesses, tenants, service users and residents. A detailed summary of the process and the responses received can be found in Appendix 7. Cabinet is asked to consider the responses and, consider whether the issues raised are addressed in the budget strategy.

Overview and Scrutiny

11.4 As part of the Council's governance arrangements for scrutiny of the Budget and Medium-Term Financial Strategy, the Council's Overview and Scrutiny Committee and Panels met during late December 2023 and early January 2024 and have scrutinised all the proposals presented in the 5th December 2023 report to Cabinet. Senior officers, relevant Members and heads of finance were in attendance at each meeting to present proposals and respond to questions from the Panel/Committee members. For some proposals, additional information was requested, which was provided.

11.5 All recommendations put forward by the Panels and the main Committee were considered by the Overview and Scrutiny Committee on 18th January 2024 and a schedule of final recommendations were agreed and referred to Cabinet. These recommendations, along with the Cabinet responses, are provided in Appendix 8.

11.6 A further meeting of the Overview and Scrutiny Committee will be held on 1 February 2024 in respect of the Budget report being presented to Cabinet on 6 February. Any additional recommendations arising from that meeting will be included in the final budget report presented to Full Council on 4 March.

Equalities Impact Assessment

11.7 The proposals in the 2024-25 Budget and 2024-2029 Medium Term Financial Strategy have been subject to equalities analyses, both individually, and collectively as a combined set of actions. The report attached as Appendix 9 summarises this analysis.

12. Contribution to the Corporate Delivery Plan 2022-2024 High level Strategic outcomes'?

12.1 The Council's draft Budget aligns to and provides the financial means to support the delivery of the Corporate Delivery Plan outcomes.

13. **Carbon and Climate Change**

13.1 Any carbon and climate change implications of the proposals contained in this report are addressed at the relevant section of the report.

14. **Statutory Officers comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)**

Finance

14.1 The financial planning process ensures that the Council's finances align to the delivery of the Council's priorities and the administration's manifesto commitments in the medium term. In addition, it is consistent with proper arrangements for the management of the Council's financial affairs and its obligation under section 151 of the Local Government Act 1972.

14.2 Ensuring the robustness of the Council's 2024/25 budget and its MTFS 2024/25 – 2028/29 is a key function for the Council's Section 151 Officer. This includes ensuring that the budget proposals are realistic and deliverable. As the MTFS report is primarily financial in its nature, comments of the Chief Financial Officer are contained throughout the report.

14.3 Following considerable and collaborative work across the council a final 2024/25 balanced budget has been achieved, requiring the Council drawdown of £5.9m from the Strategic Budget Planning Reserves. The Council continues to experience the impact of the conditions in the national economy and post pandemic environment. These factors are driving the need for £25.5m growth and addresses the assumed demand in care service, underpinned by a significant savings programme. Best efforts have been employed to derive realistic and robust budgets for 2024/25 however the Council must continue to focus on delivering its agreed programme of savings at pace which are vital in helping the ongoing financial sustainability of the authority in the longer term.

14.4 The policy of reviewing all agreed savings as part of the annual budget setting process is one measure employed to de-risk budgets as are the adjustments made since the draft Budget was presented to revise budgets to reflect government funding announcements and budgets particularly sensitive to wider economic conditions such as treasury and borrowing. This Budget continues to provide for a Corporate Contingency of c£7m across the whole MTFS period.

14.5 The formal Section 151 Officer view on the Councils financial sustainability and assessment of robustness of the council's budget, including sufficiency of contingency and reserves to provide against future strategic risks is taking on more importance than ever in this challenging financial climate. This report is written to provide the full and frank view of the Council's Chief Finance Officer (CFO) on the Council's financial position. This will be further formally set out in the CFO's Section 25 Statement contained within the final budget report to Council in March 2024.

Procurement

14.6 Strategic Procurement has been consulted in the preparation of this report and note the recommendations in section 3 and contents of the report which are not related to a procurement activity or process. Strategic Procurement will continue to work with services to enable cost reductions.

Head of Legal & Governance

14.7 The Assistant Director of Legal & Governance (Monitoring Officer) has been consulted in the preparation of this report and makes the following comments.

Procedure

14.8 In accordance with section 67 of the Local Government Finance Act 1992 (the '1992 Act'), the functions of agreeing the budget and the calculation of Council tax are to be discharged by the Full Council.

14.9 The Local Authorities (Standing Orders) (England) (Regulations) 2001 and the Budget and Policy Framework Procedure Rules at Part 4 Section E of the Constitution, set out the process that must be followed when the Council sets its budget. Accordingly, it is for the Cabinet to approve the proposals and submit the same to the Full Council for adoption in order to set the budget. However, the setting of rents and service charges for Council properties is an Executive function to be determined by the Cabinet.

Fiduciary Duty to Ratepayers

14.10 Member's fiduciary duty (i.e. legal duty as trustee of the public purse) is a material consideration to reflect upon. In making its decisions, the Council must act rationally and reasonably and should balance the nature, quality and level of services which it considers should be provided against the costs of providing those services.

Consultation

14.11 Under section 65 of the 1992 Act, the Council is under a duty to consult persons or bodies appearing to it to be representative of persons subject to non-domestic rates as regards hereditaments situated in the area of Haringey. In addition to businesses, the Council has consulted local residents. The outcome of that consultation is contained in Appendix 7 to this report. In making its decisions, the Council must conscientiously take into account the consultation responses. It should also be noted that the consultation was in the context of the budget proposals and not necessarily on the specifics of whatever decisions may be implied by the adoption of the budget.

Savings Proposals

14.12 The report proposes new savings proposals for the financial year 2024/25 e.g. reduction in staffing numbers, review of library opening hours, review of the provision of hard copy newspapers and magazines in libraries, review of

fees charged for parking, review of concessionary discounts for use of the New River Sports Centre and review of the Council Tax Reduction Scheme.

14.13 Depending on the nature of each proposal, the council may be required to take further steps prior to determining whether, how and when to implement those proposals. For example, the Department for Digital, Culture, Media and Sport states that: "We would like councils considering changing their library service to inform the DCMS Libraries team about their proposals before public engagement or consultation" (c.f. - Libraries as a statutory service - GOV.UK (www.gov.uk)). In addition, prior to considering implementing savings proposals, further steps may include e.g. carrying out further statutory consultation exercises, complying with requirements contained in legislation or guidance and carrying out full equalities impact assessments where appropriate so as to ensure that the Council complies with the public sector equality duty.

Public Sector Equality Duty

14.14 The Council must ensure that it has due regard to its public sector equality duty under section 149 of the Equality Act 2010 in considering whether to adopt the recommendations set out in this report. A full equalities impact assessment has been carried out and is contained in Appendix 9 of this report.

Flexible use of capital receipts

14.10 The report recommends that Cabinet propose approval to Full Council on the strategy as regards the proposed flexible use of capital receipts (Appendix 6 to this report). The Local Government Act 2003, section 15(1) requires a local authority "… to have regard (a) to such guidance as the Secretary of State may issue, and (b) to such other guidance as the Secretary of State may by regulations specify …". Guidance on the use of capital receipts flexibility has been issued under section 15(1) of the Act and the Council is therefore required to have regard to it (c.f. Guidance on the flexible use of capital receipts (updated August 2022) - GOV.UK (www.gov.uk)).

14.11 Among other things, the Guidance notes that -

Two codes of practice issued by the Chartered Institute of Public Finance and Accountancy (CIPFA) contain guidance on capital receipts and local authority accounting that complement the Department for Levelling Up, Housing and Communities (DLUHC) guidance. These publications are:

- *The Prudential Code for Capital Finance in Local Authorities*
- *The Code of Practice on Local Authority Accounting*

Local authorities are required to have regard to the current edition of The Prudential Code for Capital Finance in Local Authorities by regulation 2 of the Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 and to the Local Authority Accounting Code as proper practices for preparing accounts under section 21(2) of the Act.

Conclusion

14.12 In view of the conclusion reached by the Director of Finance above on the ability to set a balanced budget for 2024/25 and the Equalities comments

below, there is no reason why Cabinet cannot adopt the Recommendations in this report.

Equality

14.15 The Council has a public sector equality duty under the Equality Act (2010) to have due regard to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act;
- Advance equality of opportunity between people who share those protected characteristics and people who do not;
- Foster good relations between people who share those characteristics and people who do not.

14.16 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty. Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

14.17 This This report details the draft Budget for 2024/25 and MTFS to 2028/29, including budget adjustments and capital proposals.

14.18 An EQIA for this Budget/MTFS has been produced in full and is appended to this report which summarises potential impacts on the protected characteristics. Where required, individual EQIAs will be developed for each proposal.

14.19 The impact of the budget proposals on equalities should be seen within the context of residents' lives in Haringey. Longstanding inequalities persist in Haringey as they do nationally and globally. In recent years global events, like the COVID-19 pandemic, inflation and war have impacted on people living in the borough by perpetuating health and economic inequalities and driving community tensions and hate crime.

14.20 The primary equality challenge in the last year has been the impact of the cost-of-living crisis on residents. The cost-of-living crisis has compounded economic disadvantage, which often interacts with lack of equal opportunities and discrimination faced by individuals with protected characteristics, notably for disabled people, young people from lower socioeconomic backgrounds, and Black, Asian and minority ethnic residents more likely to live in the borough's more deprived wards and experience employment gaps.

14.21 The proposals in this budget have been developed against a backdrop of budget pressures for councils across the country, with significant national scrutiny now being given to the pressures created for councils by social care and temporary accommodation demand.

14.22 In this budget there is a 2.99% increase in Council Tax in 2024/25 after which it reduces to 1.99% across the MTFS period and a 2% increase in ASC Precept for 2024/25 after which it is assumed to discontinue. The Council Tax Reduction Scheme will provide financial assistance with Council Tax bills for residents who are on a low income or less able to pay.

14.23 With relation to the Housing Revenue Account, rents in existing homes 7.7% (September 2023 CPI 6.7% + 1%), compared with last year where government capped at 7%. New rents will be subject to the formula rent and the 5% flexibility allowed (but not where commitments are in place as set out in the landlord offer on Broadwater Farm and High Road West or those at London Affordable Rent). Service charges are charged to recover the cost of the service. Most increases in service charges are below 10%. Service charges are covered by housing benefit and Universal Credit, so any tenant in receipt of these benefits will have these costs covered.

14.24 The council recognises that this is a challenging time for our residents, businesses and communities and this budget has been developed in this context, seeking to achieve the best possible outcomes with the limited resources available to us.

14.25 In this Budget/MTFS the council has sought to promote equality by:

- Meeting increased cost pressures in adult social care, children's social care and temporary accommodation caused by inflation to ensure we continue to support our most vulnerable residents and meet our statutory obligations
- Investment in the schools estate
- Investment in Pendarren House so that more Haringey children can enjoy a stay there
- Investment in ICT for Community Hubs to enable users to access a range of services, likely to benefit those digitally excluded including older residents, disabled people and those of lower socioeconomic status
- Bringing our leisure services in-house with a range of health and wellbeing benefits for residents

14.26 Given the significant financial challenge we face as a council, this budget presents difficult decisions which may have potential negative impacts on individuals with protected characteristics. Where negative impacts are likely, EQIAs will be developed in line with the proposal and mitigating actions will be taken.

14.27 The EQIA appended to this report provides a line-by-line equalities analysis of policy proposals in this Budget/MTFS and should be consulted for further detail.

14.28 At this stage we anticipate equalities implications may be more significant with regards to the following proposals:

- Variation to library opening times based on analysis of use: may have negative implications variously for mothers of young children, young

children, disabled people and older residents who are more likely to attend in the early mornings but have positive impacts on young people and students more likely to require evening use. Reductions in hours will impact all users but particularly those of lower socioeconomic status who are more reliant on the free facilities and materials they can access through the library.

- Work with residents to develop a Libraries Strategy for Haringey to ensure we have the most efficient and effective operating model: may be more likely to impact those who are not registered with the library and won't be able to access during self-serve hours which may be more vulnerable residents with greater social needs and those experiencing isolation including disabled people. May also impact those with less confidence to attend during self-serve hours due to concerns about safety during non-staffed hours including women, young people and LGBT people. May potentially benefit residents who wish to access the library in the evenings. Potential development of community-run libraries may bring positive benefits to all residents and help to build an inclusive Libraries Strategy.

- Council Tax Reduction Scheme Review – The review will reflect the borough's changing demographics and residents migrating to Universal Credit. The scheme is yet to be developed and will require public consultation on any changes. Potential negative impacts on individuals more likely to be within the Council Tax Reduction Scheme currently, specifically those experiencing socioeconomic disadvantage.

14.29 The budget proposals for 2024/25 have been subject to a formal public consultation. A Budget Consultation Report is appended to the Budget/MTFS Cabinet Report. Key findings:

- Respondents were asked which proposals they supported and which they didn't. There was support shown for the need and principle of putting cost saving measures into the budget, moving away from the current leisure centre provider and for funding the Schools Streets programme. There was also support shown by some residents for adjusting library hours rather than have any closures, investing in social housing and new sites for modular provision and investment in health and social care in the borough. Other proposals which gained some support were the raise in council tax, removal of hard copy magazines in libraries and improving methods of enforcement in the borough.
- There was a lack of support shown by certain residents for amendments to the existing library service, particularly introducing self-service and reducing hours. There was also a lack of support from some for the ongoing refurbishment of the Civic Centre and the council taking leisure services in-house and investing in Pendarren house.
- Respondents were asked what the council should look to do in order to meet its budget challenge and save money, generate income or achieve better value. Suggestions included raising Council Tax, enforcement fees and charges. There were also suggestions to adapt the business model of libraries and start charging for certain services,

with a number of respondents recommending a subscription fee. There were suggestions to think again about certain projects which may not benefit the public substantially, use Haringey space for commercial reasons and bring in experts to advise on cost saving practices.

14.30 Respondents were asked to comment on any proposals they thought will have a bigger impact on people with protected characteristics.

14.31 It was highlighted that leisure and fitness centres and libraries are used by elderly residents not only for fitness and information centres, but also for socialising so they could be negatively impacted if the council are not equipped to bring the facilities in house.

14.32 The lack of available toilets if library hours are shortened will also negatively impact older people and potentially pregnant people. Some respondents commented that the proposed budget cuts will disproportionately impact those who are more vulnerable to social isolation and those who are economically disadvantaged.

14.33 It was suggested that those with learning difficulties may find it difficult to use an online service to read a paper, or use a self-issue/return machine, the same with people from an older generation.

14.34 There were concerns about the budget proposals negatively impacting:

- Older residents
- Disabled residents
- Those with special needs
- Those who are economically disadvantaged
- Children and Young people
- Ethnic minority groups and those for whom English isn't their first language.
- Parents of young children
- Pregnant women

15. **Use of Appendices**

Appendix 1	Summary of Final Proposed Revenue 2024-25 Budget and Medium Term Financial Plan 2024-2029
Appendix 2a	Summary of new Revenue budget growth proposals included in 5 December 2023 Cabinet report
Appendix 2b	Summary of additional new Revenue budget growth proposals now presented
Appendix 3a	Summary of new Revenue Saving proposals included in 5 December 2023 Cabinet report
Appendix 3b	Summary of additional Revenue Saving proposals now presented

Appendix 4	Draft General Fund Capital Programme 2024/25–2028/29
Appendix 5	New Capital Proposals for 2024-25 MTFS Programme
Appendix 6	Flexible Use of Capital Receipts Strategy
Appendix 7	Budget Consultation Summary of Responses
Appendix 8	Overview and Scrutiny Committee recommendations and Cabinet responses
Appendix 9	Equalities Impact Assessment
Appendix 10	Council Tax base Report 2024/25

16. **Background papers**
None

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Appendix 1 - Summary of General Fund Revenue 2023/24 Budget and Medium Term Financial Plan 2024-2029

	2023/24	Movement	2024/25	Movement	2025/26	Movement	2026/27	Movement	2027/28	Movement	2028/29
	Draft Budget		Projected		Projected		Projected		Projected		Projected
Directorate	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**
Adults, Health & Communities	108,701	(13,137)	95,564	10,137	105,701	7,373	113,074	(724)	112,350	(1,220)	111,130
Children's Services	62,949	2,223	65,173	360	65,533	360	65,893	(815)	65,128	(50)	65,078
Culture, Strategy & Engagement	33,569	(6,792)	26,777	(3,399)	23,378	(190)	23,188	(5)	23,183	0	23,183
Environment & Neighbourhood	14,565	2,710	17,275	2,294	19,569	(1,758)	17,811	(2,239)	16,439	(867)	15,572
Placemaking & Housing	7,829	(2,324)	5,505	(528)	4,977	(665)	4,312	(1,420)	3,577	(685)	2,892
Chief Executive	305	(283)	22	(250)	(229)	0	(229)	0	(229)	0	(229)
Corporate Governance	2,283	918	3,201	0	3,201	0	3,201	0	3,201	0	3,201
Finance	52,815	19,378	72,193	11,806	83,999	10,018	94,017	9,839	103,186	670	103,856
Council Cash Limit	**283,017**	**2,692**	**285,709**	**20,420**	**306,129**	**15,138**	**321,267**	**4,636**	**326,835**	**-2,152**	**324,683**
Further Savings to be Identified	0	(0)	(0)	(16,966)	(16,966)	(11,014)	(27,980)	836	(29,296)	2,152	(27,144)
Planned Contributions form Reserves	(3,500)	(2,904)	(6,404)	6,110	(294)	149	(145)	134	(11)	0	(11)
Total General Fund Budget	**279,517**	**(212)**	**279,305**	**9,563**	**288,869**	**4,273**	**293,142**	**5,606**	**297,528**	**0**	**297,528**
Funding											
Council Tax	(124,212)	(11,322)	(135,533)	(4,005)	(139,538)	(4,124)	(143,662)	(4,252)	(147,914)	0	(147,914)
Council Tax Surplus	0	(2,500)	(2,500)	2,500	(0)	0	(0)	0	(0)	0	(0)
RSG	(25,635)	(1,718)	(27,353)	(164)	(27,517)	0	(27,517)	0	(27,517)	0	(27,517)
Top up Business Rates	(59,451)	(4,235)	(63,686)	(32,305)	(95,991)	0	(95,991)	0	(95,991)	0	(95,991)
Retained Business Rates	(19,800)	(2,488)	(22,288)	(126)	(22,414)	0	(22,414)	0	(22,414)	0	(22,414)
Section 31 Grants	(21,546)	(705)	(22,251)	22,251	(0)	0	(0)	0	(0)	0	(0)
NNDR Surplus/(Deficit)	1,271	(1,271)	0	0	0	0	0	0	0	0	0
NNDR Growth	(2,000)	0	(2,000)	2,000	0	0	0	0	0	0	0
Total (Main Funding)	**(251,374)**	**(24,238)**	**(275,611)**	**(9,849)**	**(285,461)**	**(4,124)**	(289,585)	(4,252)	(293,837)	-	(293,837)
New Homes Bonus	(2,105)	315	(1,790)	(8)	(1,798)	0	(1,798)	0	(1,798)	0	(1,798)
Public Health	(21,502)	21,502	0	0	0	0	0	0	0	0	0
Other core grants	(4,536)	2,632	(1,904)	0	(1,904)	0	(1,904)	0	(1,904)	0	(1,904)
Total (Core/Other External Grants)	**(28,143)**	**24,449**	**(3,694)**	**(8)**	**(3,702)**	**-**	(3,702)	-	(3,702)	-	(3,702)

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APPENDIX 2a - New Growth Identified for 5.12.23 Cabinet

Description	Area	2024/25 £000s	2025/26 £000s	2026/27 £000s	2027/28 £000s	2028/29 £000s	Total
Funding to reflect increased costs of running Coroners Court	L&G	166					166
Additional Principal Scrutiny Officer	L&G	67					67
Additional posts to address the mis-match between demand for legal support and the current capacity of the team.	L&G	350					350
The funding will enable support to the Committees team for in person Cabinet Member signings as well as provide extra support for the Scrutiny team for the Joint Health Overview and Scrutiny Committee which our team manage on behalf of 5 boroughs.	L&G	25					25
Annual Subscription for membership of Central London Forward	CORP	40					40
Apprenticeship Levy is charged at 0.5% of the annual pay bill. Since it's introduction, the paybill has increased due to pay award and an increase to the budget is required	CORP	250					250
This growth reflects the forecast cost of the revised arrangements for delivering the Leisure management service in house.	ERE	946					946
This is the final adjustment required to rebalance the Early Year funding between the DSG and the GF in accordance with the DSG grant conditions.	CORP	243					243
Time limited saving on waste fleet vehicles is due to expire from 2024/25 resulting in the need to reinstate a budget to cover this cost.	ERE	100					100

APPENDIX 2a - New Growth Identified for 5.12.23 Cabinet

Description	Area	2024/25 £000s	2025/26 £000s	2026/27 £000s	2027/28 £000s	2028/29 £000s	Total
Various cost pressures including the implications of the National 'Big Switchoff'; Audio Visual equipment; Council's internal case management software (Halo); Microsoft E5, Cyber Security.	CSE	1,150					1,150
£1m to cover the in year pressure on care costs and £0.88m to cover forecast inflation for 2024/25 (less the £500K that was placed in the MTFS for growth in 24/25)	CYP	1,388	660	660			2,708
Impact of inflationary increase in Adults social care as well as the additional costs of Children transitioning to Adults social care services (£16.3m 24/25). Temporary Accomodation increased demand as well as inflationary pressure (£3.0m 24/25).	AHC	19,267	7,311	7,311			33,889
	Total	**23,992**	**7,971**	**7,971**	**0**	**0**	**39,934**

Acronyms	Area	2024/25 £000s	2025/26 £000s	2026/27 £000s	2027/28 £000s	2028/29 £000s	Total
Adults, Health and Communities (includes TA)	AHC	19,267	7,311	7,311	-	-	**33,889**
Culture, Strategy and Engagement	CSE	1,150	-	-	-	-	**1,150**
Corporate	CORP	533	-	-	-	-	**533**
Environment and Neighbourhoods	ERE	1,046	-	-	-	-	**1,046**
Legal & Governance	L&G	608	-	-	-	-	**608**
Children's Services	CYP	1,388	660	660	-	-	**2,708**
	Total	**23,992**	**7,971**	**7,971**	**-**	**-**	**39,934**

APPENDIX 2b - New Growth Identified Post 5.12.23 Cabinet

MTFS Tab	Category	Title of Option:	Description	2024/25 £000s	2025/26 £000s	2026/27 £000s	2027/28 £000s	2028/29 £000s	Total
Non-Service Revenue	Service Growth	Bank Charges	Impact of Increased Card payments for services	300					300
Non-Service Revenue	Service Growth	External Audit	Impact of increased External Audit Fees	155					155
Adults	Service Growth	Community Alarms	Additional Funding to meet the cost of providing this Service	200					200
CSE	Service Growth	Senior Management roles	Growth for re-evaluated Senior Management roles	60					60
			Totals	**715**	**0**	**0**	**0**	**0**	**715**

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APPENDIX 3a - New Savings Identified for 5.12.23 Cabinet

Ref	Description	Directorate	2024/25 £000s	2025/26 £000s	2026/27 £000s	2027/28 £000s	2028/29 £000s	Total
CYP24_SAV_001	We are developing a new Transitions Service to provide support and advice to young people with Special Educational Needs and Disabilities so that they know what to expect in the future and can prepare for adulthood. This will be a multi-disciplinary team that works with partners to ensure young people have the help and support they need for their health, relationships, independent living and employment.	CYP	-673	-1,152	-777	-724	-1,220	-4,546
AHC24_SAV_001	Identify an additional site for additional modular Lodge provision. 60 units of accommmodation by mid 2026	AHC	0	**-126**				-126
AHC24_SAV_002	Proposing to increase the supply of Lodge accommodation by 100 units. Conversion and extension of one of our existing hostels has been scoped. We are also pursuing the possibility of repurposing /developing other council owned buildings as temporary accommodation options. If we can identify further sites, there is scope to identify additional savings.	AHC	-110	**-383**				-493
AHC24_SAV_003	Use of one bed social housing as temporary accommodation for families with a baby or young children – we have more 1 bed social housing properties than any other size – using a small proportion as TA would reduce TA costs. Our Annual Lettings Plan allows for 10 properties to be used for this purpose. This will be expanded to 15 and then 30 in 2023-24. Moves will particularly be focused to ensure people from Lodge accommodation are moved on, freeing up lodge vacancies.	AHC	-69	**-69**				-138
AHC24_SAV_004	Use of two bed social housing as temporary accommodation for families – using a small proportion as TA would reduce TA costs. We intend to introduce this provision within our Annual Lettings Plan for 24/25 and allow for 10 properties to be used in this way. The particular focus will be on families who need to stay locally , thereby reducing any additional costs for other parts of the council due to care and support needs.	AHC	-37	0	0	0	0	-37
AHC24_SAV_005	We will work with residents to identify suitable accommodation to move on from TA, ensure they are move ready and can settle successfully into the idenitfied accommdoation within the community . (staffing costs have been deducted from calculated savings)	AHC	-57	0	0	0	0	-57

APPENDIX 3a - New Savings Identified for 5.12.23 Cabinet

Ref	Description	Directorate	2024/25 £000s	2025/26 £000s	2026/27 £000s	2027/28 £000s	2028/29 £000s	Total
AHC24_SAV_006	A Project Officer will be engaged to work with families to remove any bariers to moving on from temporary accommodation. Targetted casework will include but not limited to ensuring that housholds are 'move' ready and supporting households to bid realistically for social housing . This is envisaged to be a 2.5 to 3 year project that will benefit from new supply delivered through the new build programme.	AHC	-400					-400
AHC24_SAV_007	Leases held by the Council are restricted by TA subsidy arrangements (rental at 90% of 2011 Local Housing Allowance(LHA)). This subsidy is insufficent , which result in a cost to the council. Homes for Haringey Leases are not restricted in this way, converting leases to Homes for Haringey reduces costs to Council while ensuring that accommodation is within current LHA rates and affordable to residents.	AHC	-175	-54				-229
AHC24_SAV_008	This proposal is to make savings of £300,000 from our existing contract for 0-19 year old integrated public health services. We will work with the provider on more efficient ways of working, while maintaining front line service offer for residents. Implementation period will be at least 6 months from sign off of council budget as then we will need to work with the provider. Implementation is expected by October 2024/25 with full year effect in 25/26.	AHC	-150	-150	0	0	0	-300
AHC24_SAV_009	Through the pandemic and in the following period we learnt that many residents like to access sexual health services from local pharmacies and through online advice and testing services, which are less expensive than clinic based services and achieve good outcomes. This proposal continues to take this emphasis forward with a further shift to self service and pharmacy options without impacting outcomes for residents.	AHC	-300	0	0	0	0	-300
AHC24_SAV_010	Continuing Healthcare Is a funding stream that solely provides the full responsibility of a person's care on health services. Haringey receives the lowest Continuing Health Care funding in North Central London and is very low compared nationally, this project aims to fully imbed the Continuing Health Care process within Adult Social Care and gain a greater proportion of health funding. Ensuring residents are receiving the right level of funding for high/complex placements, expenditure for these placements would be picked up by health (fully health funded, joint funded and Funded Nursing Care). To increase the number of referrals for Continuing Health Care funding, to the North Central London Integrated Care Board and establish this as part of business as usual over the next year.	AHC	-1,200	0	0	0	0	-1,200
AHC24_SAV_011	When a person has care and support needs, there are many ways this can be delivered, one option is that we can Commission a provider directly to provide that care and support. Alternatively, direct payments are another methodology, and this can enable people to have more control on how their care is provided. Using direct payments is more cost effective since they do not include the costs home care agencies charge on top of the price of care.	AHC	-800	0	0	0	0	-800

APPENDIX 3a - New Savings Identified for 5.12.23 Cabinet

Ref	Description	Directorate	2024/25 £000s	2025/26 £000s	2026/27 £000s	2027/28 £000s	2028/29 £000s	Total
AHC24_SAV_012	The strength and asset-based approach is a national agenda, it changes the direction of how we provide care and support for individuals to look within their communities on how they can be supported before coming to a service led offer. It enables social care to reduce service demand by working with our voluntary sector and really focusing on early intervention and prevention. Strength Based Working produces better outcomes for people and reduced strain on adult social if residents are enabled to remain as independent as possible, strengthening people's ability to remain within the community. The use of digital tools, supports strength work based working approach.	AHC	-350	0	0	0	0	-350
AHC24_SAV_013	We are expecting to receive an uplift to the public health grant of £292k in 24/25, which can be directed to existing council priorities/spend which contribute to public health outcomes	AHC	-292	0	0	0	0	-292
AHC24_SAV_014	Supported living is when the residents remain in the community as independently as possible is enabled to claim housing benefit and their one-to-one care is provided. Currently we need to strengthen the support of living offer within Haringey. To ensure that people can reside in the Community with one-to-one provider delivered in their own home, this will reduce the cost. This will reduce the demand on nursing and residential expensive placements out of borough. Using digital tools, is key for the supported living model in Haringey.	AHC	-300	0	0	0	0	-300
AHC24_SAV_015	Currently we support approximately 3500 people to remain independently in the community on a daily basis, by auditing provider services and ensuring that the service delivery is accurate and in line with the care and support plan, we will look to find efficiencies in the system. By utilising a personalised approach and reviewing what services are available within the community for early Intervention early intervention and prevention, we may be able to reduce demand by working with our voluntary sector to deliver low levels of care, support, shopping, cleaning, et cetera additionally. By completing a financial review with residents, they may be entitled to some benefits that could support some of these low level activities.	AHC	-250	0	0	0	0	-250

APPENDIX 3a - New Savings Identified for 5.12.23 Cabinet

Ref	Description	Directorate	2024/25 £000s	2025/26 £000s	2026/27 £000s	2027/28 £000s	2028/29 £000s	Total
AHC24_SAV_016	We have externally commissioned an independent review of the Mental Health Services, the review highlighted significant evidence to support that Haringey is a massive outlier nationally for funding between the age of 18 -65, this has been a long-standing issues. Steps are being taken to focus on a locality model, that will bring Mental Health Social Workers back into localities, still aligned to the Mental Health Trust. However more controls are being put in place to control Mental Health spend, additionally the review team are focusing on the high-cost placements, to ensure we are reviewing costly/out of borough packages of care and bring back into a local provision of care.	AHC	-200	0	0	0	0	-200
AHC24_SAV_017	A Better Care Fund (BCF) external review has taken place, work underway with the ICB and NHS England, in redesigning our Better Care Fund planning for 23/24, we have a deadline of the 02/10/2023. Haringey has £7.8m within the plan, are looking at opportunities to redirect spend from the wider system back into Adult Social Care.	AHC	-200	0	0	0	0	-200
CSE24_SAV_001	The use of our libraries varies from one branch to another at different time of the day. Based on footfall analysis we know that library use is typically lowest in mornings. Young people in particular have a need for study space in the evenings and libraries are ideal as a free and safe community space. We want to look at varying the opening hours of our libraries to times when they are most heavily used, which could include later in the evenings, allowing us to allocate resources in a more targeted way. Library buildings and facilities could be made available to other services even when the library service itself is not operating e.g., Community Hub teams and VCS organisations. The proposed saving is based on reviewing hours at the six branch libraries with a mixture of mornings and afternoons opening times based on demand and demographics, to ensure libraries remain accessible to all. The service is currently carrying some vacancies and agency cover which will reduce the need for any proposed redundancies. No library building would be closed.	CSE	-675	0	0	0	0	-675
CSE24_SAV_002	The proposal is to introduce self-service technology in libraries. Further work is required to establish feasibility, based on learning from other boroughs; it would require investment in digital and other technologies eg CCTV but has the potential to reduce staffing by 40%. This could be introduced potentially along with a community run library service option as has been introduced in other boroughs (eg Camden and Barnet), and could also sit alongside use of library buildings by other public services and agencies, enabling users to access, check out or return library items when using those other services. No library building would be closed. The saving is modelled on a similar reduction in numbers of library staff to the previous proposal, but later in the MTFS period to enable the detailed feasibility work to be done.	CSE	0	-304	-372	0	0	-676

APPENDIX 3a - New Savings Identified for 5.12.23 Cabinet

Ref	Description	Directorate	2024/25 £000s	2025/26 £000s	2026/27 £000s	2027/28 £000s	2028/29 £000s	Total
CSE24_SAV_003	The proposal is to stop providing hard copy newspapers and magazines in libraries. Newspapers and magazines are now available on Pressreader which provides thousands of newspapers and magazines from around the globe. Many library services that stopped newspapers and magazines during COVID lockdown have not reintroduced them. (n.b. this saving as proposed here has been removed and replaced with a new saving regarding hard reading material CSE24_SAV_012)	CSE	-30	0	0	0	0	-30
CSE24_SAV_004	Review all contracts controlled by Digital and Change and all ICT contracts held elsewhere in the organisation, utilising Gartner support: - Benchmarking against other councils - either through Gartner or LOTI, or CIO group - Write to all organisations requesting efficiencies/savings - Rationalise licenses - Review what we are paying for and performance - Renegotiation of contracts up for renewal Review and rationalise all applications used by the council with a view to reducing our digital estate. We will focus in on applications that are: - Duplicated elsewhere - Due for renewal - Under used or under performing - Offer an opportunity to move to SAAS (Software as a Service) and reduce FTE We will also review the teams involved in managing and using these applications and consider a hiatus on any new applications.	CSE	-150	-150	0	0	0	-300
CSE24_SAV_005	Carry out a restructure of Digital and Change in line with a new target operating model and a view to release some savings. This will involve: ◙ Review & reduce the renewal of Fixed Term Contracts ◙ Restructure the team and reduce FTEs by 2 • Centralise digital functions	CSE	-100	-130	0	0	0	-230
CSE24_SAV_006	Building on current portfolio to seek additional significant digital and other advertising space in borough. Income generation is hard to quantify without detailed feasability work. Savings here are net of an additional fixed term post to explore and deliver opportunities.	CSE	35	-35	0	0	0	0
EN24_SAV_001	This proposal seeks to recover operating cost through the review of Fees and Charges (£500k) by ensuring Haringey remains in line with other Authrorities. Review of Parking Services (£500k). Optimise deployment to ensure an appropriate level of enforcement in all areas (£300k).	E&N	-1,300	0	0	0	0	-1,300

APPENDIX 3a - New Savings Identified for 5.12.23 Cabinet

Ref	Description	Directorate	2024/25 £000s	2025/26 £000s	2026/27 £000s	2027/28 £000s	2028/29 £000s	Total
EN24_SAV_002	The continuation of the schools streets programme expansion is anticipated to generate an additional net income of £170k as a by-product of the enforcement activity associated with the scheme. Enforcement income can not be used as a revenue raiser and is ring-fenced for specified spend in the Traffic Management Act 2004.	E&N	-170	0	0	0	0	-170
EN24_SAV_003	Enhance our enforcement on environmental crime (ie flytipping, littering and waste licensing) by reconfiguring the team and deploying additional resources to meet residents demand for a cleaner borough.	E&N	-100					-100
EN24_SAV_004	The New River Sports Centre has an operational subsidy of £170,000 (Total subsidy of £225k - £54k central recharges). This proposal seeks to realise savings by : Reviewing concessionary discounts; Reducing enery usage through technological improvements;Increase customer base through equipment upgrades and additional activities.	E&N	-53	-40	-34	-26	-17	-170
EN24_SAV_005	Breaches to the Housing Act 2004 such as unlicenced premises can be charged a Civil Penalty Notice of up to £30k and in addition, Improvement Notices can be served on the person in control of the property and a Charge made for that Improvement Notice.	E&N	-13	-13	-13	-13	0	-52
		Total	**-8,119**	**-2,606**	**-1,196**	**-763**	**-1,237**	**-13,921**

Acronyms	Area	2024/25 £000s	2025/26 £000s	2026/27 £000s	2027/28 £000s	2028/29 £000s	Total
Adults, Health and Communities (includes TA)	AHC	-4890	-782	0	0	0	**-5672**
Culture, Strategy and Engagement	CSE	-920	-619	-372	0	0	**-1911**
Placemaking and Housing	P&H	0	0	0	0	0	**0**
Environment and Neighbourhoods	E&N	-1636	-53	-47	-39	-17	**-1792**
Children's Services	CYP	-673	-1152	-777	-724	-1220	**-4546**
	Total	**-8119**	**-2606**	**-1196**	**-763**	**-1237**	**-13921**

APPENDIX 3b - New Savings Identified Post 5.12.23 Cabinet

Directorate	Ref	Title of Option:	Description	2024/25 £000s	2025/26 £000s	2026/27 £000s	2027/28 £000s	2028/29 £000s	Total
Culture, Strategy & Engagement	CSE24_SAV_008	Replace central budget that funds National Graduate Development Programme salaries	The central budget in HR that funds NGDP graduates' salaries would be adjusted; services would pay for any placements they offer, as these graduates are recognised as a valuable resource. The corporate saving will be delivered over two years as our existing graduates complete their two year placements.	-£50	-£150				**-200**
Culture, Strategy & Engagement	CSE24_SAV_009	Improved Commercial Operations	Appoint a specialist Head Commercial Operator to identify opportunities and develop a strategy to enhance income generation from our assets	£100	-£250				**-150**
Culture, Strategy & Engagement	CSE24_SAV_010	Increased advertising income	Convert static advertising to digital, introduce smaller high street advertising, deliver more large format digital advertising sites, develop SME offer for marketing design & print in line with our ethical advertising policy.	-£150	-£150				**-300**
Culture, Strategy & Engagement	CSE24_SAV_011	Community Hubs	To implement multi-disciplinary digitally-enabled community hub teams, working alongside the VCS and health partners in locality areas in response to local need. Savings delivered through service efficiencies including reduction in duplication as a result of blended roles and pooled budgets. It will also enable a reduction in or maximisation of the use of council buildings.	-£550	-£250	-£200	£0	£0	**-1,000**
Culture, Strategy & Engagement	CSE24_SAV_012	Library Hard copy titles	We will seek to retain a limited number of hard copy titles, based on usage, funded from within the wider library budget.	-£25					
Environment & Resident Experience	EN24_SAV_009	CTRS review	A review of the Council Tax Reduction Scheme and anticipated base of recipients following residents migrating to universal credit and changing demographics. This will require public consultation on any proposed changes following the review.		-£1,000	-£1,000			**-2,000**
Environment & Resident Experience	EN24_SAV_010	New Traffic Filter Schemes	Camera enforcement to address non-conformance of vehicle restrictions that seek to improve the residential environment.			-£300	-£250		**-550**
Environment & Resident Experience	EN24_SAV_011	Pay & Display Tariff for EV charging	Helping to increase access to electric vehicle charge points by applying a parking tariff for the time needed	-£12					**-12**

APPENDIX 3b - New Savings Identified Post 5.12.23 Cabinet

Directorate	Ref	Title of Option:	Description	2024/25 £000s	2025/26 £000s	2026/27 £000s	2027/28 £000s	2028/29 £000s	Total
Environment & Resident Experience	EN24_SAV_012	Stop resetting the initial discount period following PCN challenges	Limit the discount period for PCN payments to 14 days where challenges against the PCN are made but rejected, rather than resetting the 14 day period once the decision is made. A commitment to ensuring that there is a minimum of 2 days to make payment will be standard with an additional period for postal responses built into the process.	-£50	-£50				**-100**
Environment & Resident Experience	EN24_SAV_013	Redesign Tennis Court Charging	Applying a more consistent cross-borough charging system to offset ongoing maintenance costs, albeit with potential concessions		-£10	-£5			**-15**
Environment & Resident Experience	EN24_SAV_014	Events in parks	Expand the range and scope of events in parks to increase community participation and cohesion		-£50	-£50			**-100**
Placemaking & Housing	P&H24_SAV_007	Commericial Portfolio and rental opportunities	Increase income from our commercial portfolio		-£75	-£50	-£100	-£75	**-300**
Placemaking & Housing	P&H24_SAV_008	Property Disposals	Property disposals to realise one-off Capital receipts to reduce borrowing, or generating equivalent income from different property uses, in line with our Strategic Asset Management and Property Improvement Plan.					-£335	**-335**
			Total	**-£737**	**-£1,985**	**-£1,605**	**-£350**	**-£410**	**-£5,062**

APPENDIX 4: 2024/25 - 28/29 DRAFT CAPITAL PROGRAMME

Key for Source of Funding	
H	Haringey Borrowing
S	Haringey Borrowing Self-Financing
E	External

SCHEME REF	SCHEME NAME	BRIEF DESCRIPTION	Source of Funding	2024/25 Budget	2025/26 Budget	2026/27 Budget	2027/28 Budget	2028/29 Budget	2024/25 - 28/29 Total
				£,000	£,000	£,000	£,000	£,000	£,000
101	Primary Sch - repairs & maintenance	Grant funded through the school condition allocation - used for boiler replacement, window replacement, roof replacement etc.	E	4,000	2,000	2,000	2,000	0	**10,000**
102	Primary Sch - Major Capital Works (Existing MTFS)	Haringey borrowing to fund major renewal and replacement works.	H & E	7,500	4,027	2,500	2,500	0	**16,527**
110	Devolved Sch Capital	A grant that is passed through to schools	E	531	531	531	531	0	**2,124**
114	Secondary Sch - Major Capital Works (Existing MTFS)	Haringey borrowing to fund major renewal and replacement works.	H	3,983	801	0	0	0	**4,783**
121	Pendarren House	Further investment in Pendarren House so that more Haringey children can experience a stay there.	H	500	0	0	0	0	**500**
124	In-Borough Residential Care Facility	Self-financing borrowing scheme to fund in borough/council run facility to replace high cost out of borough placements.	S	3,000	2,900	0	0	0	**5,900**
125	Safety Valve	Grant funded by DfE to support creation of additional SEND places. Being used as part of the Safety Valve programme.	E & H	3,350	8,561	0	0	0	**11,911**
126	EYES and Social Care developments to the LiquidLogic System	Haringey borrowing to fund further development & expansion of Children Social Care IT system	H	250	2,000	250	0	0	**2,500**
Children's Services				**23,114**	**20,820**	**5,281**	**5,031**	**0**	**54,245**
201	Aids, Adap's & Assistive Tech -Home Owners (DFG)	Grant funded through the Disabled Facilities Grant to enable people to stay in their homes rather than other settings.	E	2,193	2,200	2,200	2,200	0	**8,793**
209	Assistive Technology	Grant funded through the Disabled Facilities Grant to enable people to stay in their homes rather than other settings.	S	300	0	0	0	0	**300**
211	Community Alarm Service	Grant funded through the Disabled Facilities Grant to enable people to stay in their homes rather than other settings.	H	177	177	177	177	0	**708**
214	Osborne Grove Nursing Home	Self-financing borrowing scheme to convert create a 70 bed nursing facility, progression of the scheme is subject to a successful business case.	S	700	1,000	5,000	10,000	28,341	**45,041**
222	Wood Green Integrated Care Hub	Haringey borrowing to make a contribution to the Wood Green Integrated Care Hub.	H	0	1,000	0	0	0	**1,000**
225	Locality Hub	Haringey borrowing to support the localities strategy.	H	1,500	674	0	0	0	**2,174**
Adults, Health & Communities				**4,870**	**5,051**	**7,377**	**12,377**	**28,341**	**58,016**

SCHEME REF	SCHEME NAME	BRIEF DESCRIPTION	Source of Funding	2024/25 Budget	2025/26 Budget	2026/27 Budget	2027/28 Budget	2028/29 Budget	2024/25 - 28/29 Total
				£,000	£,000	£,000	£,000	£,000	£,000
119	School Streets	School Streets are an important piece of work in improving the health of children in our borough. Thus creating a safer, less polluted space for children outside school which has so many benefits for their health, not least by improving air quality and increasing their daily physical activity. This scheme is funded utilising SCIL & external funding.	E	325	325	325	325	325	**1,625**
301	Street Lighting	Haringey borrowing to fund renewal of the street lighting infrastructure.	H	1,000	1,000	1,000	1,000	0	**4,000**
302	Borough Roads	Haringey Borrowing to improve infrastructure.	H	6,000	6,000	6,000	6,000	6,000	**30,000**
304	Flood Water Management	Mixed funded scheme but predominately Haringey Borrowing to improve infrastructure.	H	710	0	0	0	0	**710**
305	Borough Parking Plan	Haringey borrowing to fund renewal of the parking infrastructure.	H	250	0	0	0	0	**250**
309	Local Implementation Plan(LIP)	Transport for London grant for improvement works to elements of the highways infrastructure.	E	1,000	1,000	1,000	1,000	0	**4,000**
310	Developer S106 / S278	Contributions from developers to mitigate the effect of their developments on the Council's infrastructure.	E	250	250	250	250	0	**1,000**
311	Parks Asset Management: (Existing MTFS)	Mixed funded scheme to improve the Council's park assets but predominately Haringey Borrowing.	H	450	450	450	450	0	**1,800**
313	Active Life in Parks: (Existing MTFS)	Mixed funded scheme to improve the Council's park assets but predominately Haringey Borrowing.	H	400	400	400	400	0	**1,600**
314	Parkland Walk Bridges	Haringey borrowing to fund remediation works on the parkland walk bridges.	H	3,350	350	350	2,500	350	**6,900**
322	Finsbury Park	This expenditure is funded through the Finsbury park account.	E	500	500	500	500	0	**2,000**
325	Parks Vehicles	Self-financing Haringey borrowing to move to electric vehicles.	S	360	0	0	0	0	**360**
328	Street & Greenspace Greening Programme	Haringey borrowing to fund the scheme of greening the borough.	H	178	75	75	0	0	**328**
332	Disabled Bay/Blue Badge	Haringey borrowing to fund improved/increased blue badge parking.	H	150	0	0	0	0	**150**
334	Parks Depot Reconfiguration	Haringey borrowing to fund improvements to various parks depots.	H	100	0	0	0	0	**100**
336	New River Sports & Fitness	Self-financing Haringey borrowing projects to improve New River to attract new customers.	S	533	533	533	0	0	**1,599**
338	Road Casualty Reduction (Externally Funded)	This scheme is funded utilising SCIL & external funding	E	950	950	950	950	950	**4,750**
341	Leisure Services	This is to fund a range of investment in the Council's Leisure Services which will increase usage of the facilities and also reduce emissions through changes to boilers and other reduction measures	H	3,660	825	825	1,063	1,063	**7,436**
342	Public Protection - To replace life expired IT system	This investment will enable Public Protection to replace life expired IT system and enhance the users experience	H	300	50	0	0	0	**350**
Environment & Resident Experience				**20,466**	**12,708**	**12,658**	**14,438**	**8,688**	**68,958**
401	Tottenham Hale Green Space	A mixed funded scheme using Haringey Borrowing, grants and S106 to fund the programme of green space improvements	E & H	422	2,958	0	0	0	**3,380**
402	Tottenham Hale Streets	A mixed funded scheme using Haringey Borrowing, grants and S106 to fund the programme of public realm improvements	E & H	4,468	500	0	0	0	**4,968**

SCHEME REF	SCHEME NAME	BRIEF DESCRIPTION	Source of Funding	2024/25 Budget	2025/26 Budget	2026/27 Budget	2027/28 Budget	2028/29 Budget	2024/25 - 28/29 Total
				£,000	£,000	£,000	£,000	£,000	£,000
408	Down Lane Park	Creation of Down Lane Park Scheme	**E & H**	5,000	2,591	0	0	0	**7,591**
421	HRW Acquisition	Externally funded to fund the acquisition of properties to deliver the HRW scheme.	**E**	12,200	4,600	112,600	0	0	**129,400**
430	Wards Corner Development	Self-financing Haringey borrowing to develop the site.	**S**	1,000	2,937	1,400	1,200	0	**6,537**
457	Future High Street Project	A mixed funded scheme 45:55 external grant: Haringey borrowing. The overall project has a range of interventions to improve the infrastructure of the borough. Largely concentrated in the Gourley Triangle development.	**H & E**	3,206	875	0	0	0	**4,081**
459	Wood Green Regen Sites	A mixed funded scheme to regenerate Wood Green sites	**H & E**	1,227	2,804	4,227	0	0	**8,257**
465	District Energy Network (DEN)	A mixed funded scheme with government grant, loaned at low interest rates and self-financing Haringey borrowing. The scheme to deliver low carbon energy in the borough is subject to a full business case being agreed by Cabinet in approximately Q1 0f 2024.	**H & E**	1,000	3,250	2,250	1,000	2,813	**10,313**
480	Wood Green Regen (2)	A mixed funded scheme to regenerate Wood Green	**H & E**	2,393	996	2,755	0	0	**6,144**
4007	Tottenham Hale Decentralised Energy Network (DEN)	A mixed funded scheme with government grant, loaned at low interest rates and self-financing Haringey borrowing. The scheme to deliver low carbon energy in the borough is subject to a full business case being agreed by Cabinet in approximately Q1 0f 2024.	**H & E**	2,500	4,223	7,000	7,500	7,500	**28,723**
4008	Wood Green Decentralised Energy Network (DEN)	A mixed funded scheme with government grant, loaned at low interest rates and self-financing Haringey borrowing. The scheme to deliver low carbon energy in the borough is subject to a full business case being agreed by Cabinet in approximately Q1 0f 2024.	**H & E**	1,800	2,853	7,500	7,500	7,500	**27,153**
4010	Selby Urban Village Project	Mixed grant and self-financing Haringey borrowing project to create the village. Successful application for levelling up funding of £20m. Report on forward plan to reposition the scheme in the light of current developments, such as interest rate rises, construction cost inflation etc.	**E**	6,000	21,416	6,665	0	0	**34,081**
4011	Commercial Property Remediation	The scheme is to invest in our commercial portfolio to retain tenants a increase the rents that can be charged. The first year is funded by Haringey borrowing with latter years subject to successful business case(s).	**S & H**	4,214	4,000	3,000	3,000	0	**14,214**
4012	Energy Performance Certificate improvements	The scheme is to invest in our commercial portfolio to ensure that the buildings are compliant with the ePC regime and thus retain tenants. First year is Haringey borrowing with later years subject to successful business case(s).	**S & H**	750	750	500	500	0	**2,500**
4013	Clean Air School Zones	Haringey borrowing in the first year and external funding assumed for later years. Scheme is to fund works to improve air quality where a school street is not possible.	**H**	400	400	400	400	0	**1,600**
4014	Walking and Cycling Action Plan (WACAP) LTN delivery	External funding to deliver the WACAP.	**E**	708	708	708	708	708	**3,540**
4015	Walking and Cycling Action Plan (WACAP) Strategic cycle route delivery	External funding to deliver the Strategic cycle route element of the WACAP	**E**	1,033	1,033	1,033	1,033	1,033	**5,163**

SCHEME REF	SCHEME NAME	BRIEF DESCRIPTION	Source of Funding	2024/25 Budget	2025/26 Budget	2026/27 Budget	2027/28 Budget	2028/29 Budget	2024/25 - 28/29 Total
				£,000	£,000	£,000	£,000	£,000	£,000
4016	Walking and Cycling Action Plan (WACAP) Cycle Parking (Hangers) delivery	External funding to deliver the Hangers element of the WACAP	**E**	118	118	118	118	118	**590**
316	Asset Management of Council Buildings	Haringey borrowing to fund essential works to council buildings. Includes provision for the accommodation strategy spend on offices in Station Road as described in the cabinet report in April.	**H**	5,000	4,250	1,000	0	0	**10,250**
Placemaking & Housing				**53,438**	**61,261**	**151,155**	**22,959**	**19,672**	**308,484**
330	Civic Centre Works	Self-financing Haringey borrowing to provide a new Civic Centre as per Cabinet April 2023.	**S**	31,234	26,097	3,584	0	0	**60,915**
447	Alexandra Palace - Maintenance	Haringey borrowing to fund capital works at the Palace.	**H**	470	470	470	470	0	**1,880**
464	Bruce Castle (Condition Works)	This investment is to supplement existing works at Bruce Castle Museum Condition Works	**H**	450	450	0	0	0	**900**
602	Corporate IT Board	Haringey borrowing to fund ICT improvements and developments	**H**	500	0	0	0	0	**500**
604	Continuous Improvement	Haringey borrowing to fund mobile ICT assets (laptops) renewal.	**H**	1,300	950	662	0	0	**2,912**
625	CCTV Move and Replacement of end of Life Infrastructure	CCTV move and replacement of end of life infrastructure	**H**	733	733	733	0	0	**2,200**
626	Corporate Data Platform	This is investment in a Corporate Data Platform to further inform our interactions with residents	**H**	250	1,250	1,000	0	0	**2,500**
627	Hybrid AV between now and Civic Centre coming on line	This investment is required to support Hybrid AV working between now and Civic Centre coming on line	**H**	300	500	450	0	0	**1,250**
628	Locality Hub ICT	This if fund ICT in Locality Hubs to enable users to access a range of services and experiences	**H**	400	600	0	0	0	**1,000**
629	Leisure Insourcing ICT	This is fund the ICT element of the proposed Leisure insourcing	**H**	433	0	0	0	0	**433**
630	Libraries IT and Buildings upgrade	Libraries Hub ICT (Public Access)	**H**	300	500	150	0	0	**950**
631	Ally Pally - Counter Terrorism	The investment is to allow the Alexandra Palace Trust to implement measures statutory measures to counter terrorism	**H**	496	182	363	0	0	**1,041**
632	Ally Pally - Health & Safety Works	The investment is to undertake health & safety works at Alexandra Palace	**H**	798	286	293	0	0	**1,377**
633	Ally Pally - Compliance works	This investment is to fund compliance works at the Alexandra Palace	**H**	815	1,194	2,546	0	0	**4,555**
634	Ally Pally - Invest to Earn	This investment is to allow Alexandra Palace to undertake investment to generate additional income. This will take the form of a loan to Alexandra Palace and will be subject to a satisfactory business case	**S**	1,437	1,628	1,128	0	0	**4,193**
635	Mobile Replacement (Smart Phones / Devices)	This investment is to support the replacement of mobile devices that in turn supports mobile working	**H**	175	250	225	0	0	**650**
636	Replacing Desktop AV / Screens in Offices	This investment is to replace various ICT elements such as desktop AV and Screens in Offices	**H**	150	150	150	0	0	**450**
655	Data Centre Move	Haringey borrowing to fund the relocation of the data centre from River Park House as part of the accommodation strategy.	**H**	500	450	0	0	0	**950**
656	BT Big Switch Off	Haringey borrowing to fund new digital lines as BT are switching off all analogue lines. This budget is an estimate to cover the IT element of the switch off. If there are physical works required then these will be met from scheme 316.	**H**	1,000	0	0	0	0	**1,000**

			Source of Funding	2024/25 Budget	2025/26 Budget	2026/27 Budget	2027/28 Budget	2028/29 Budget	2024/25 - 28/29 Total
SCHEME REF	SCHEME NAME	BRIEF DESCRIPTION		£,000	£,000	£,000	£,000	£,000	£,000
657	Corporate Laptop Refresh	Haringey borrowing to fund mobile ICT assets (laptops) renewal.	H	550	1,250	1,200	1,100	0	**4,100**
Culture, Strategy & Engagement				**42,290**	**36,941**	**12,954**	**1,570**	**0**	**93,756**
TOTAL GF CAPITAL PROGRAMME				**144,178**	**136,781**	**189,425**	**56,375**	**56,701**	**583,458**

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New Capital for 2024/25 MTFS Programme **APPENDIX 5**

Description of Capital Bids	Directorate Area	Funding Source (LBH Borrowing, External, Self Financing borrowing)	2024/25 (£'000)	2025/26 (£'000)	2026/27 (£'000)	2027/28 (£'000)	2028/29 (£'000)	Total (£'000)
EYES and Social Care developments to the LiquidLogic System	Children's Services	LBH Borrowing	1,250	1,250	0	0	0	**2,500**
Further investment in Primary Sch - Major Capital Works (New Bid)	Children's Services	LBH Borrowing	0	1,527	0	0	0	**1,527**
Further investment in Secondary Sch - Major Capital Works (New Bid)	Children's Services	LBH Borrowing	3,713	531	0	0	0	**4,244**
Furter investment in Pendarren House so that more Haringey children can experience a stay there.	Children's Services	LBH Borrowing	500	0	0	0	0	**500**
This is to fund a range of investment in the Council's Leisure Services which will increase usage of the facilities and also reduce emissions through changes to boilers and other reduction measures	Environment & Resident Experience	LBH Borrowing	3,660	825	825	1,063	1,063	**7,436**
This is a continuation of the investment in Borough roads	Environment & Resident Experience	LBH Borrowing	(191)	(191)	2,860	6,733	6,733	**15,944**
This investment will enable Public Protection to replace life expired IT system and enhance the users experience	Environment & Resident Experience	LBH Borrowing	300	50	0	0	0	**350**
This is an increase in Active Life in Parks Budget	Environment & Resident Experience	LBH Borrowing	230	230	230	230	0	**920**
This is an increase in Park Asset Management Budget	Environment & Resident Experience	LBH Borrowing	200	200	200	200	0	**800**
This if fund ICT in Locality Hubs to enable users to access a range of services and experiences	Culture, Strategy & Engagement	LBH Borrowing	400	600	0	0	0	**1,000**
This is fund the ICT element of the proposed Leisure insourcing	Culture, Strategy & Engagement	LBH Borrowing	433	0	0	0	0	**433**
Laptop Replacement	Culture, Strategy & Engagement	LBH Borrowing	500	500	500	500	500	**2,500**
Libraries Hub ICT (Public Access)	Culture, Strategy & Engagement	LBH Borrowing	300	500	150	0	0	**950**

Description of Capital Bids	Directorate Area	Funding Source (LBH Borrowing, External, Self Financing borrowing)	2024/25 (£'000)	2025/26 (£'000)	2026/27 (£'000)	2027/28 (£'000)	2028/29 (£'000)	Total (£'000)
CCTV move and replacement of end of life infrastructure	Culture, Strategy & Engagement	LBH Borrowing	733	733	733	0	0	**2,200**
This is investment in a Corporate Data Platform to further inform our interactions with residents	Culture, Strategy & Engagement	LBH Borrowing	250	1,250	1,000	0	0	**2,500**
This investment is required to support Hybrid AV working between now and Civic Centre coming on line	Culture, Strategy & Engagement	LBH Borrowing	300	500	450	0	0	**1,250**
This investment is to supplement existing works at Bruce Castle Museum Condition Works	Culture, Strategy & Engagement	LBH Borrowing	450	450	0	0	0	**900**
The investment is to allow the Alexandra Palace Trust to implement measures statutory measures to counter terrorism	Culture, Strategy & Engagement	LBH Borrowing	496	182	363	0	0	**1,041**
The investment is to undertake health & safety works at Alexandra Palace	Culture, Strategy & Engagement	LBH Borrowing	798	286	293	0	0	**1,377**
This investment is to fund compliance works at the Alexandra Palace	Culture, Strategy & Engagement	LBH Borrowing	815	1,194	2,546	0	0	**4,555**
This investment is to allow Alexandra Palace to undertake investment to generate additional income. This will take the form of a loan to Alexandra Palace and will be subject to a satisfactory business case	Culture, Strategy & Engagement	Self Financing borrowing	1,437	1,628	1,128	0	0	**4,193**
This investment is to support the replacement of mobile devices that in turn supports mobile working	Culture, Strategy & Engagement	LBH Borrowing	175	250	225	0	0	**650**
This investment is to replace various ICT elements such as desktop AV and Screens in Offices	Culture, Strategy & Engagement	LBH Borrowing	150	150	150	0	0	**450**
			16,899	**12,646**	**11,653**	**8,726**	**8,296**	**58,220**

Appendix 6

Flexible Use of Capital Receipts

Flexible Use of Capital Receipts Strategy

1. The Government has provided a definition of expenditure which qualifies to be funded from capital receipts. This is:

   > "Expenditure on any project that is designed to generate ongoing revenue savings in the delivery of public services and/or transform service delivery to reduce costs and/or transform service delivery in a way that reduces costs or demand for services in future years for any of the public sector delivery partners"

2. The schedule of the proposed utilisation of the flexible capital receipts is detailed below. The list is made of both new and some previously agreed schemes, which are required to be reaffirmed as part of the Council's budget setting process for financial year 2024/25.

3. **Proposals for the flexible use of capital receipts requiring agreement**

   a) Corporate Support to all improvement programmes: A range of corporate services are required to assist in the delivery of the many improvement programmes. This funding will allow dedicated support to be accessed for all programmes. The savings are embedded in the individual improvement programmes so are not accounted for here.

   b) London Construction Partnership (LCP) Framework: This funding and associated investment relates to additional income generated through the London Construction Programme (LCP), which is hosted by Haringey Council and managed by Strategic Procurement team. The purpose of the LCP is to establish collaborative contract vehicles in the construction sector (e.g. frameworks, dynamic purchasing systems (DPS) etc.) across London and recently extended to include the Home Counties.

   c) Counter Fraud: This funding is employing resources to undertake investigations under the proceeds of crime act (POCA).

   d) Service Change Fund (Redundancies): This budget is to fund the costs of statutory redundancy payments.

   e) Improvement to asset & energy management arrangements and accommodation strategy: The Council is working towards massively reducing its carbon footprint through improvement to existing assets and reducing the number of buildings that it operates from.

   f) Transition to Adulthood: This funding is targeted to deliver saving within Children and Leaving Care services as the children transition to adulthood.

   g) Demand Management in Adult social Care: This funding will continue the work to manage demand for high-cost placements in the adults and children's care services through providing services earlier and in local settings.

   h) Continuing Health Care (CHC): Increasing income from recharges to health for Council support to residents with health needs.

i) Children's Services Pause Project: To divert infants from entering the care system'

j) New Change Framework: This budget will support in the council's overall cost reduction strategy whilst maintaining excellent services for residents and communities.

k) Temporary Accommodation Reduction Project: This budget will support initiatives leading to a reduction in the use of temporary accommodation (TA) by the Council.

CIPFA's guidance requires that the impact on the Council's prudential indicators should be considered when preparing a Flexible Use of Capital Receipts Strategy. The indicators that will be impacted by this strategy are set out below:

a. The Capital Financing Requirement will increase as these capital receipts would otherwise have financed capital expenditure or reduced borrowing.
b. Financing costs as a percentage of the net revenue stream will rise as more borrowing is undertaken. It is expected that the savings generated by the schemes will offset the costs arising from the additional borrowing. Therefore, there is no likely impact on Council Tax.

The prudential indicators show that this strategy is affordable and will not impact on the Council's operational and authorised borrowing limits.

New proposals for the flexible use of capital receipts

Ref.	Title	2024/25 (£'000)	2025/26 (£'000)	2026/27 (£'000)	2027/28 (£'000)	2028/29 (£'000)	**Total (£'000)**	2024/25 (£'000)	2025/26 (£'000)	2026/27 (£'000)	2027/28 (£'000)	2028/29 (£'000)	**Total (£'000)**	
a	Corporate Support to all improvement programmes	763	671				1,434						**0**	*
b	London Construction Partnership Framework	310					310		-200	-200	-200	-200	**-800**	
c	Counter fraud work	75					75	-100	-100	-100	-100	-100	**-500**	
d	Service Change Fund (Redundancies)	2,000	2,000				4,000						**0**	*
e	Improvement to asset & energy management arrangements and Accommodation Strategy	800	800				1,600	(184)	(627)	(1,212)	(1,847)	(2,122)	**-5,992**	
f	Transition to Adulthood	843					843	(673)	(1,825)	(2,602)	(3,326)	(4,546)	**-12,972**	
g	Demand Management in Adult social Care	500	500				1,000						**0**	*
h	Continuing Health Care (CHC)	250					250	(1,200)	(2,400)	(3,600)	(4,800)	(6,000)	**-18,000**	
i	Children's Services Pause Project	180					180	(501)	(501)	(501)	(501)	(501)	**-2,505**	
j	New Change Framework	1,810	1,790				3,600						**0**	*
k	Temporary Accommodation Reduction Project	200	200				400						**0**	*
Grand Total		**7,731**	**5,961**	**0**	**0**	**0**	**13,692**	**-2,658**	**-5,653**	**-8,215**	**-10,774**	**-13,469**	**-40,769**	

* The FUCR investment is required to make possible a number of savings initiatives reported in the service area savings narrative.

Appendix 7

Budget Consultation Report

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Appendix 7

1. Executive Summary

- This year, a total of 541 questionnaires were completed. 533 of these were completed through the council's online engagement platform, 6 were completed in hard copy and sent via post, and 2 organisational responses from FORE and The Library Campaign were received via email.
- Respondents were asked which proposals they supported and which they didn't. There was support shown for the need and principle of putting cost saving measures into the budget, moving away from the current leisure centre provider and for funding the Schools Streets programme. There was also support shown by some residents for adjusting library hours rather than have any closures, investing in social housing and new sites for modular provision and investment in health and social care in the borough. Other proposals which gained some support were the raise in council tax, removal of hard copy magazines in libraries and improving methods of enforcement in the borough.
- In contrast, there was concern shown by some respondents for amendments to the existing library service, particularly introducing self-service and reducing hours. There was also a lack of support from some for the ongoing refurbishment of the Civic Centre and the council taking leisure services in-house and investing in Pendarren house.
- Respondents were asked what the council should look to do in order to meet its budget challenge and save money, generate income or achieve better value. Suggestions included raising Council Tax, enforcement fees and charges. There were also suggestions to adapt the business model of libraries and start charging for certain services, with a number of respondents recommending a subscription fee. There were suggestions to think again about certain projects, use Haringey space for commercial reasons and bring in experts to advise on cost saving practices.

2. Consultation Process

2.1 Introduction

The budget proposals for **2024/2025** have been subject to a formal public consultation. This report sets out the findings from the Council's consultation on its budget for **2024/25** which also refreshes its Medium-Term Financial Strategy (MTFS) to cover the period up to 2028. This report presents the findings of this consultation to Cabinet, to inform the final decision on the Council's budget for **2024/2025**.

2.2 Technical Details & Method

The general consultation consisted of an online questionnaire published on: haringeybudget2024.commonplace.is together with a Budget Consultation Booklet which provided background information about the council's budget setting process and the financial challenges the council faces.

The consultation was widely promoted via the council's business e-newsletter, the council's website and social media and a subscriber launch email from the Haringey Engagement Hub. The consultation survey was open for responses between 14th December 2023 and 14th January 2024.

All responses to the consultation have been read in full by officers to identify the substantive matters raised in the comments received. The analysis of the responses sought to categorise matters raised in relation to the areas of the council's budget proposals. The aim of this report is to provide the council and the wider public with a summary of these matters raised.

The sections in this report cover:

- The responses to Q1 and 2 regarding the levels of support and lack of support for the proposals in the policy
- The responses to Q3, Q4 and Q5 regarding suggestions to gain better spend, gain savings or create income generation
- A summary of responses to Q6 covering equalities impact responses.
- A summary of Q7 covering any further comments on proposals
- A summary of Q8 covering suggestions for future engagement on Budget Consultations.

A complete set of responses are available for download on the Budget Consultation project page on the Haringey Engagement Hub.

2.2.1 Questionnaire Design

The questionnaire was developed to ascertain residents' views on the proposals put forward in the draft budget. In particular, the consultation invited views on the:

- Proposals which respondents supported and why.
- Proposals which respondents didn't support and why.
- Any proposals that respondents think we should consider which might save money, generate income or achieve better value from council spend.
- Comments outlining whether respondents thought individuals with protected characteristics may be impacted by proposals.
- Any other comments.

2.2.2 Questionnaire Analysis

A number of themes arose from the consultation. These are reported in greater detail where they were raised repeatedly by different respondents to the consultation. The number of respondents for other themes were too low to draw any clear conclusions.

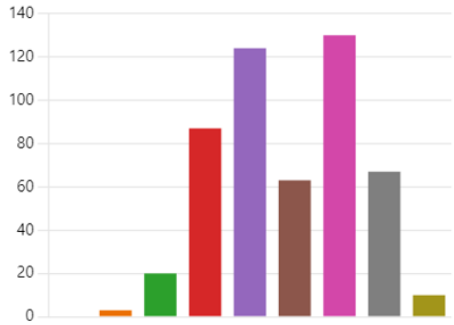
Appendix 7

3. Responses to the Consultation

3.1 Respondents Demographic Data

Age

Under 17	0
17-21	3
22-29	20
30-39	87
40-49	124
50-59	63
60-74	130
75+	67
Prefer not to say	10



The largest group of respondents who answered this question were aged between **60-74** (130 responses) and **40-49** (124 responses).

87 respondents selected **30-39,** while 67 individuals identified as **75+**. 63 respondents selected **50-59,** 20 selected **22-29** and 3 respondents selected **17-21.**

10 respondents preferred not to say.

Sex

Male	139
Female	345
Prefer not to say	25
Other	2



This question asked respondents which best describes their sex. 345 respondents identified as **Female** with 139 identifying as **Male**. 2 respondents selected **Other**.

25 respondents selected **Prefer not to say**.

Appendix 7

Home ownership status

Home owner/Occupier	418
Landlord	3
Private renter	56
Social tenant	18
On the housing register	4



This question asked respondents about their home ownership status. 418 respondents selected **Home Owner/Occupier**, 56 selected **Private Renter** 56. 18 respondents selected **Social Tenant** with 4 respondents selecting **On the housing register.** 3 respondents selected **Landlord.**

Gender Identity

Yes	5
No	412
Prefer not to say	44



Trans is an umbrella term to describe people whose gender identity is not the same as, or does not sit comfortably with, the sex they were assigned at birth. This question asked whether respondents considered themselves to be trans. The vast majority of respondents (412) selected **No** with 44 respondents selecting **Prefer not to say**.

5 respondents selected **Yes**

Disability

Yes	69
No	385
Prefer not to say	40

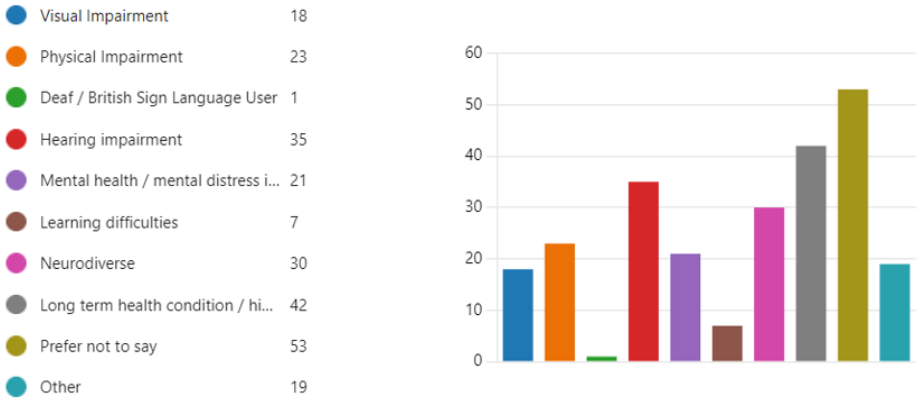


Under the Equality Act 2010, a person is considered to have a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.

Appendix 7

This question asked respondents to identify whether they have any disabilities or any long-term mental or physical conditions. As the graphs shows, the majority of respondents (385) stated that they **Do Not** have any disabilities. 69 respondents **did** consider themselves to have a disability.

40 respondents **preferred not to say**.



From those respondents who identified a disability. 42 respondents live with a **Long term health condition**, 35 respondents had a **Hearing impairment**.

There were 30 respondents who identified as **Neurodiverse**, 23 indicated living with a **Physical impairment** and 21 indicated issues related to **Mental health or mental distress**.

18 respondents had a **Visual impairment**, 7 respondents stated they had learning difficulties and 1 respondent selected Deaf/British Sign Language user.

19 respondents selected **Other** and 53 **Preferred not to say**

Ethnicity

The majority of respondents to the Budget Consultation would describe themselves as being **White British** (276).

79 respondents selected **White – Any other background.** 13 respondents selected **White Irish** and 1 respondent selected **White Gypsy or Traveller** as their ethnicity.

There were 4 respondents described their background as **Black African** and 4 respondents who selected **Black Caribbean**. 1 respondent selected **Any other black background**.

There were 8 respondents described their ethnicity as **Asian (Indian)**, 3 respondent selected **Asian Chinese** and 3 described their ethnicity as **Asian Bangladeshi**. 3 respondents selected **Asian Pakistani** with 2 respondents selecting **Asian – Other.**

6 respondents selected **Other – any other ethnic background.** 3 respondents selected **Other – Turkish** and one respondent selected **Other - Arab**

Appendix 7

National Identity

Respondents were asked, 'How would you describe your national identify?'

The majority of respondents to the Budget Consultation identify as being **British** (294) with 94 people identifying themselves as **English**. There were 20 respondents who selected **Irish**, 8 respondents who considered themselves as **Italian** and 7 respondents who selected **Welsh**.

6 respondents selected **American**, 5 respondents selected **Scottish**. 4 respondents who considered themselves as **German** and 3 respondents selected Turkish. 2 respondents selected **Bangladeshi, Columbian, Cypriot, Ghanaian**, **Spanish, American and Indian.**

The following countries were represented by 1 respondent each: **China, Eritrea, Jamaica, Poland and Somalia**

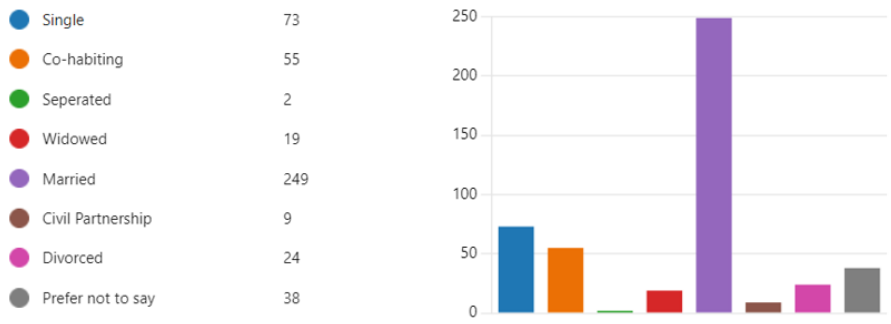
Language

446 respondents selected their main language as English

10 respondents selected **French**, 8 selected **Spanish,** 5 selected **Italian** and 4 selected **German** and **Portuguese** respectively.

2 Respondents selected **Greek** and 1 selected Albanian. 7 Respondents selected **Other**.

Marriage and Civil Partnership



249 respondents selected **Married**, 73 as identified as **Single** and 55 respondents are **Co-habiting.**

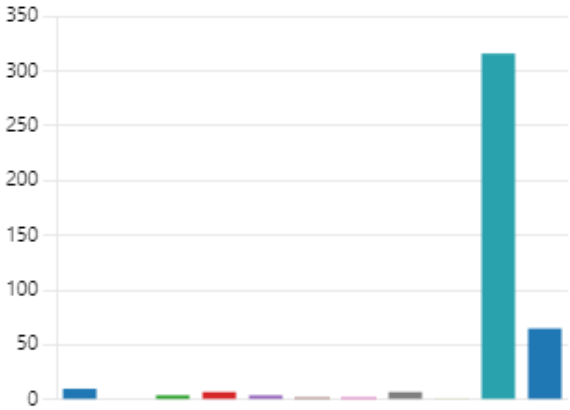
24 respondents selected **Divorced,** 19 selected **widowed,** 9 selected in a **Civil Partnership** and 2 selected **Separated.**

38 respondents selected **Prefer not to say.**

Appendix 7

Socioeconomic Status

Universal Credit	10
Income-based Jobseeker's Allo...	0
Working Tax Credit	4
Child Tax Credit	7
Pension Credit	4
Housing Benefit	2
Income-related Employment an...	2
Council Tax Reduction Support	7
Income support	1
None of the abover	316
Prefer not to say	65

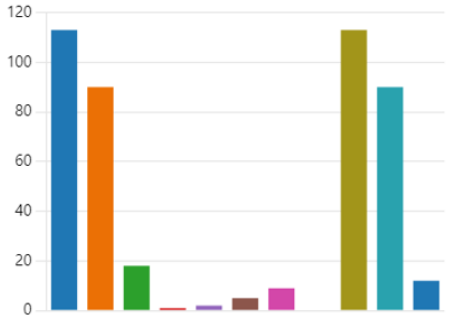


10 respondents selected Universal credit, 7 respondents selected that they receive **Council Tax Reduction Support**, 7 respondents selected **Child Tax Credit**, 4 selected **Working Tax Credit** and Pension Credit respectively.

2 respondents selected **Housing Benefit** and 2 respondents selected **Income-related Employment and Support Allowance (ESA)**. 1 respondent selected **Income Support**.

Religion or belief

Atheist	113
Christian	90
Jewish	18
Rastafarian	1
Buddhist	2
Hindu	5
Muslim	9
Sikh	0
No religion	113
Prefer not to say	90
Other	12

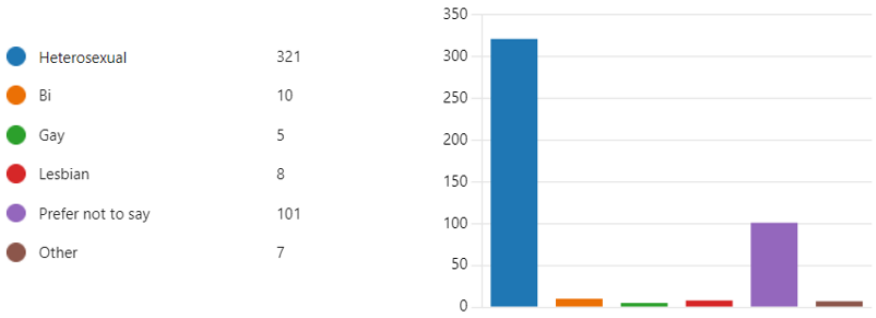


There were 113 respondents who selected **Atheist** and 113 who selected **No religion**

There were 90 respondents who selected **Christian**, 18 who selected **Jewish**, 9 who selected **Muslim** and 5 who selected **Hindu.** 2 respondents selected **Buddhist** and 1 respondent selected **Rastafarian.**

There were 90 respondents who selected **Prefer not to say** and 12 respondents who selected **Other**.

Sexual Orientation



Respondents were asked 'What best describes your sexual orientation?' The majority of respondents described themselves as **Heterosexual/Straight** (321), 10 respondents selected **Bisexual** and 8 selected **Lesbian**. 5 respondents selected **Gay.**

101 respondents selected **Prefer not to say** and 7 selected **Other**

4. Detailed Findings

4.1 Q1 – Which proposals do you support and why?

Budget Management

Residents recognised the tough decisions the council had to make for this year's budget and appreciated the council taking steps to prevent special measures being enforced by the Government.

Leisure Facility Management

18 residents supported the council ending its relationship with Fusion who were managing the leisure facilities within the borough and moving control of facilities in-house.

Hope was expressed that this would lead to lower costs, increased membership, and better maintained facilities.

Schools Streets programme

12 respondents supported the continuation of the School Streets programme. Those who responded thought it was vital for keeping children and families safe and reducing pollution-related illness.

Library hours

30 respondents supported adapting the borough's library service with the variation of opening hours to suit each libraries needs and maximise resources when footfall was highest, rather than have a closure of any individual libraries.

It was felt, in some instances, that the money required to maintain full service was better spent in areas such as health and social care. There was also support for allowing other services to use the library buildings after hours.

9 respondents supported the removal of hard copy newspapers and magazines with 3 mentioning PressReader as an alternative but also flagging that support may be needed for some to access this service.

Housing

2 respondents supported increasing the borough's social housing portfolio with 1 recognising the challenge of providing truly affordable housing.

4 people supported the proposal to identify new sites for modular lodge provision to house families when they first become homeless.

1 respondent supported the council's proposal to set rents for new council lets at 5% above the rent formula, in line with the rent standards.

Social Care

15 respondents supported proposals relating to adult social care in the borough.

1 respondent supported the new Transitions Service to provide support for young people with Special Education Needs and Disabilities (SEND).

Climate change initiatives

2 respondents supported the council investing in measures which will help support decarbonisation and achieve climate change targets during the ongoing climate emergency.

Raise in Council Tax.

There were 11 respondents who supported the proposal to increase council tax and to levy the 2% Adults Social Care Precept to provide an increased budget for the council to benefit residents.

Removal of hard copy magazines and newspapers in libraries

10 respondents supported the removal of hard copy magazines and newspapers. Reasons given included cost and environmental issues.

There was also support from some of the respondents for the use of PressReader as an alternative.

Enforcement, fines and charges.

6 residents supported enforcement and fines to deter illegal parking, Housing Act breaches and to prevent environmental crime. Some of these respondents put forward specific locations in the borough where they felt this was being overlooked.

There were also calls to increase the amount of speed cameras and for the council to base the amount charged for parking on the type and size of the vehicle in question.

There were recommendations to put money obtained back into highways improvements and the borough's Walking and Cycling Action Plan.

Healthcare

7 respondents supported the self-service sexual health facilities as respondents believe it's a proven model that relieves pressure on GPs and is cost effective.

There was also support from 9 respondents for the review into Mental Health Services, bringing them back in house and cut any unnecessary outsourcing costs. There was also support from 2 residents for increasing the 'Continuing Healthcare' funding.

Other

One individual cited support for Wood Green regeneration.

2 respondents supported investment in Pendarren House, with 1 of them commenting on the positive impact it had when they visited as a child. 1 respondent supported the loan to Alexandra Palace to continue offering cultural activities. 3 respondents showed support for the council making wider usage of its advertising space portfolio, subject to ensuring products advertised were appropriate.

4.2 Q2– Which proposals do you not support and why?

Changes to Library funding

378 respondents were concerned about reductions in resources for libraries in the borough. There were concerns that this would impact the worst off in society. Respondents also raised concerns that it inevitably would lead to the closure of certain smaller libraries.

There were various comments highlighting resident's pride in the existing library programme and detailing how important libraries are to the local community, with respondents explaining how Haringey's libraries have aided them and their families, particularly children. It was also stressed that libraries are used for much more than just obtaining books.

It was felt by many respondents that the libraries are particularly important when the cost of living is so high as they are a place where residents can not only have access to books and education but other facilities beneficial to residents. 46 respondents mentioned libraries importance as warm spaces. 29 respondents noted that the toilet facilities available where important and highlighted that in some cases, may be the only public bathroom available in the area.

There were concerns that cuts to the budget would result in reduced literacy and education for deprived populations and lead to poorer physical and mental health in the future. There were also concerns regarding the negative impact it may have on social mobility in the borough.

Some respondents questioned whether the council could have confidence in the saving amounts predicted. There were also concerns that, whilst there would be short terms savings for library costs, the knock-on negative impacts would lead to larger costs for the council in areas such as social care and children's services.

There were also concerns over the decision to reduce costs following the expenditure of public money on the refurbishments of many libraries in the borough.

One group have advised they believe the social economic benefits are five times higher than the amount of Haringey's library budget. They also felt it should be considered that the library is already having to adapt its service to deal with cuts in other areas and adapt its support for residents due to ongoing issues such as extreme weather.

Reduction in library hours

There were 135 respondents who specifically cited a reduction in hours that libraries would be open as a negative. It was felt that, particularly as in winter, they provide a warm and safe space for people to use during the day. They are also viewed as a free and available venue to help people combat isolation and loneliness.

Other reasons given included that it would be unsuitable to have varied hours as residents had varied work patterns. Other concerns expressed were for library users with protected characteristics, who could only go at times that typically would not be busy.

3 respondents challenged the proposals to change library hours based on footfall patterns. It was also highlighted that some residents value less busy hours, for instance, older people, job-seekers, childminders and parents or carers of young children who may bring their children to libraries early in the morning when there was low footfall for groups and classes. It was also stressed by some that it was better for some children with special educational needs and disabilities to attend during these hours.

Self-service machines in libraries

39 respondents commented on their lack of support for self-service machines. People commented on how any reliance on self-service machines would impact their usage of libraries negatively, making them unwelcome and less safe. Concerns were flagged about the reliability of self-service machines where they are already installed and the need for librarians to support people to use them.

It was felt by many that the benefits of having trained librarians was being undervalued.

There were concerns about safety or the perception of safety if there were no librarians working. There were also concerns for anti-social behaviour and theft of stock to take place in this event.

Residents told how library staff are essential to assisting users and create a community link. It was felt by some that having a digital replacement for staff would have the same impact for residents as closing libraries.

3 respondents commented on the impact to the librarians who may lose jobs at a time where the cost of living is so high. Many respondents commented that they felt the introduction of updated IT and CCTV was not a valid replacement.

There were concerns raised by respondents about whether volunteers were suitable to fill in, describing how often librarians have to deal with complex issues including running literacy initiatives and community building events as well as signposting patrons to other services and these activities were not something a volunteer without full training and experience could deliver. There were also concerns raised about the likelihood of actually getting people to volunteer.

10 respondents referred to a neighbouring council who have tried, in their view, unsuccessfully to deliver a similar operating model. Some of the respondents reported that user numbers had dropped significantly.

Removals of newspapers in libraries

16 respondents raised concerns about the removal of hard copy newspapers, particularly without sufficient staff available to help people use PressReader. Some of these respondents commented that in doing this, the council were not being inclusive.

There were 3 respondents who expressed concerns about the PressReader service. 1 pointed out that it largely oriented to a US readership and does not provide for some of Haringey readers' most local papers.

Civic Centre refurbishment

2 respondents voiced concerns over the continued investment in the refurbishment of the Civic Centre particularly in the context of proposed changes to the library service.

Leisure Services

20 respondents voiced concerns over taking Haringey's leisure facilities in-house. Whilst it was generally recognised that Fusion had not delivered against expectations, concerns were cited about the costs associated with this proposal and the council's expertise to run leisure services in comparison with alternative specialist providers.

Several responses proposed that the council approach other third parties who had more experience to run it on their behalf and manage costs more effectively.

Other

1 respondent did not support investment in Pendarren house feeling that it is neglected and of low capital value. An alternative was proposed, namely, to use nearby facilities in Lee Valley.

3 respondents did not support an increase in the advertising space portfolio. 1 respondent proposed charging higher rates to advertisers as an alternative. Another respondent was concerned about digital advertising screens and whether they were more likely to appear in the east of the borough than the west.

4.3 Detailed Findings for Q3, Q4 and Q5

Q3 As we look to meet our budget challenge through the development of further proposals, are there any changes or proposals you think we should consider which might save money, generate income or achieve better value from council spend?

The council will need to identify additional savings or sources of income between now and February in order to achieve a balanced budget. As we look to develop further measures:

Q4 Are there any changes or proposals you think we should consider which might save money or achieve better value from council spend?

Q5 Are there any changes or proposals you think we should consider which might generate income?

Council Tax and other charges

There were calls from 24 residents to raise either Council Tax or other taxes such as those levied on businesses in the borough. The majority of suggestions were to raise council tax. There was one respondent who proposed higher charges for garden waste, particularly in the context of a subsidy for library services. Another respondent proposed higher charges for

leases to larger companies. 1 respondent proposed a revaluation of property and expansion of property bands to achieve a better balance of charges.

Enforcement, fines and fees

9 respondents proposed higher charges for parking. Some support was expressed for higher parking charges for larger vehicles such as SUVs. Other suggestions included fines for parking on pavement kerbs, the option to purchase an annual visitor parking permit and doing away with online permits on the basis they make the job more challenging for parking enforcement officers.

Some residents suggested higher fines for Low Traffic Neighbourhood scheme violations to both bring in income and ensure compliance. There were also requests for some to have more areas with tighter speed limits and enforcements. One respondent proposed higher permit charges for second and large vehicles in CPZs. Another expressed the view that all parking permits should cost more otherwise the council is subsidising car ownership.

Not all respondents adopted this stance with at least one respondent expressing the view that further expansion of LTNs and CPZs would be for income generation purposes.

5 respondents called for additional speed cameras in the borough with 3 of these naming specific locations.

There were also suggestions to add an additional levy on high streets.

4 respondents wished to see more enforcement against rogue landlords. These responses linked poor letting practices to abuse of tenants, poor property maintenance and illegally dumping rubbish such as old mattresses.

The council were also encouraged by respondents to increase vigilance and prosecutions for littering, fly tipping and unhygienic waste disposal.

Leisure Services

As seen in the responses provided to questions 1 and 2, there was support and a lack of support for bringing leisure services in-house. 2 residents supported the move, proposing charging for some leisure activities and seeking compensation from Fusion. 7 respondents thought there were financial benefits to be had by searching for another specialist provider rather than bringing it in-house. Some of the respondents had also expressed these views in questions 1 and 2.

Management of libraries (Selection of stock, subscription fees, paid events, reduction of hours)

Several ideas were raised about how to manage libraries in a manner that could save money. Ideas included having fee-raising activities and subscriptions.

Ideas also included rotating paid staff throughout the libraries, so each library has at least day a week with professional staffing. There were also suggestions to remove underused stock such as the DVD collection.

There were also suggestions to stop upgrading libraries and calls to rent out space in the library to commercial organisations to bring in income.

Some residents asked for fundraising and direct donations to libraries to be allowed.

Some proposals called on the council to develop further the working relationships with Library Friends groups to help work on proposals that will benefit the council and ultimately residents. There were also numerous suggestions to rent out space in the library to commercial organisations in order to bring in income.

There was also questioning whether certain costs like heating in the summer was necessary.

There were recommendations for charging to use the library. There were also suggestions to charge to host commercial events and partner with publishers for events.

Haringey People

5 respondents proposed ending the production and printing of Haringey People. 1 respondent thought that it was sufficient to have a digital version only. 1 respondent proposed a digital version with limited hard copies available in libraries. At least 4 further respondents proposed ceasing publishing a council magazine without citing the publication's exact title.

Staff and Outsourcing

Respondents expressed various concerns about the number of staff the council employ, particularly those not delivering frontline services and the rate of salaries in senior grades. 1 respondent was concerned about pay inequalities between differently grades. They felt there were cost savings to make by reducing the headcount at the council.

There were suggestions to manage council expenses by cutting printing costs, restricting mileage allowances, and having staff reductions to save money.

There were also suggestions to use fewer contractors and agency staff with concerns expressed about the quality of some contractors.

5 suggestions were made for the council to stop outsourcing tasks to consultancies. 1 respondent took the opposite view recognising that in some instances consultants can add temporary capacity where needed.

Property

A few respondents suggested the council use its portfolio of properties to bring in revenue via renting space or selling assets. There were also calls to get better solicitors to help the council in contract negotiations, particularly when selling properties.

There were calls for the council to ensure they got the best price when selling property. There was also the suggestion to sell naming rights of property to corporations.

Housing

There were suggestions to ensure all social housing was occupied with tenants. Some residents thought that social tenants should be encouraged to maintain their properties rather than the council paying for it.

There was also a suggestion to obtain agreements from developers to allow the council to use any unoccupied premises for council business.

Some respondents expressed concern regarding loss of income where council properties are illegally sub-let or where properties are standing empty.

Music events

5 respondents encouraged the council to charge higher fees to host music events in Finsbury Park. 1 of those respondents disliked the events but felt that in the current financial context the council should earn more from such events. A further respondent supported the cessation of such events altogether on the basis of noise and littering nuisance.

Other

One proposal was to stop projects which did not lead, in the respondent's view, to significant benefit to residents and could be deemed as superficial. Other respondents asked for the council to invest in the arts and to work with the GLA more.

There was also a request to bring in experts to advise the council on where to save money.

1 respondent proposed it would be better value for residents to re-allocate the whole budget for carbon management to other areas of the Planning & Building Standards budget.

Proposals of areas in which to stop investment included road safety measures, floodlight provision for tennis courts and the ongoing scheme to resurface Parkland Walk.

The value for money of the current waste services contract was questioned.

Some respondents mentioned the benefits of investing in SEN children and their families, and the long-term reduction this measure would have on adult social care resources. There were also calls for investment in cycle lanes and the benefits for residents who wouldn't need to pay for public transportation.

There was also a recommendation from a respondent to remove phone boxes from the areas the vandalism that may take place to them had knock on effects in the community.

4.4 Q6 Equalities Impact

The council has a responsibility, under the Equality Act 2010, to consider whether our proposals disproportionately impact any groups of residents who share a protected characteristic. (Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex, Sexual Orientation) Please tell us if you feel that any of our proposals will have a bigger, negative, impact on a specific group of or groups of residents or a bigger positive impact.

It was highlighted that leisure and fitness centres and libraries are used by elderly residents not only for fitness and information centres, but also for socialising so they could be negatively impacted if the council are not equipped to bring the facilities in house.

The lack of available toilets if library hours are shortened will also negatively impact older people and potentially pregnant people.

Some respondents commented that the proposed budget cuts will disproportionately impact those who are more vulnerable to social isolation and those who are economically disadvantaged.

It was suggested that those with learning difficulties may find it difficult to use an online service to read a paper, or use a self-issue/return machine, the same with people from an older generation.

There were concerns about the budget proposals negatively impacting:

- Older residents
- Disabled residents
- Those with special needs
- Those who are economically disadvantaged
- Children and Young people
- Ethnic minority groups and those for whom English isn't their first language.
- Parents of young children
- Pregnant women

4.5 Q7 Other Comments

Do you have any other comments on our proposed budget for 2024/25?

A number of respondents used this section to reaffirm concerns about reduction of library budget and proposals to vary hours along with moving to self-service machines. 1 respondent said that PressReader was hard for them to use.

There were also calls for more funding for leisure centres along with requests to better maintain parks and trees in the borough.

4.6 Q8 Suggestions for Future Budget Consultation Engagement

We want to continue to find new and engaging ways to give residents a genuine opportunity to offer informed views on future budget proposals, in line with the Haringey Deal. Please let us know any suggestions you have for how we can do this in the future.

There were a number of ways residents suggested engaging with them. These suggestions are listed below:

- Emailing newsletters
- Asking Councillors to directly communicate with residents
- Advertise consultations wider including in local press
- Asking businesses to contribute
- Create an app to give people up to date information
- Place surveys on Haringey Council website front page
- Complete door knocking exercises
- Put posters in the community
- Have longer consultations

- Engage more with community groups
- Ensure all consultations are easy read
- Put more information in Haringey People
- A longer consultation period
- Hold a Citizens Assembly
- Hold Town hall style events
- Hold at a more suitable time of the year

Overview & Scrutiny Committee (Corporate, CS&E and E&RE)					
Ref	**MTFS Proposal**	**Further info requested by the Panel (if appropriate)**	**Comments/Recommendation**	**Cabinet Response Req'd (Yes/No)**	**Cabinet to agree not agree/partially agree recommendation**
General Issues					
Recommendation 1 Culture, Strategy & Engagement	2023/24 Outturn Position & 2024/25 Budget Position	None	Noting the particular budget pressures relating to Digital and IT services and that this was exacerbated by the higher levels of insourced services in recent years, the Panel recommended that all knock-on costs associated with insourcing should be budgeted for over the longer-term at the time when that decision is made.	Yes response to be added below	Agree
Cabinet Response to Recommendation 1	The Cabinet agrees and it should be noted that the MTFS makes provision for such costs in preparation for the Leisure Management insourcing, for example.				
Recommendation 2 Culture, Strategy & Engagement	2023/24 Outturn Position & 2024/25 Budget Position	Noting that the budget pressures relating to Digital and IT services also included factors such as the exchange rate, general inflation, licences/contracts and hardware (in addition to insourcing costs as above),	The Committee noted the response to this but considered that this was a high spend area of the council and continued to request that the Overview and Scrutiny Committee receive a report on the causes of increasing contract costs in a consolidated report.	Yes response to be added below	Agreed

		the Panel requested a breakdown of these costs. **Response:** The £0.23m projected budget pressure in Digital Services reported at Q2 comprised contract pressures of £0.33m offset by an underspend on staffing of £0.10m. The projected contract pressure is based primarily on additional costs being incurred on in-year contract renewals with suppliers raising prices to account for inflation and exchange rate movements. Movement of Digital contract inflation is tracked within the Service with pressures reported as part of the budget monitoring process and forecasted into future financial years to aid budget monitoring and financial planning. The process used to track and report inflation involves complex formulas and calculations which track contracts over multiple years of indexation linked to			

		contract regulations and fiscal movement. This makes it difficult to break the causes of increasing contract costs down into a consolidated report in the way requested by the Committee.			
Cabinet Response to Recommendation 2	The original period 6 position reported by Digital services has subsequently changed. The original £0.5m pressure was based on a projection for inflation on contracts and actuals incurred up to period 6 and has been reprofiled to project a year end position and pressure of £0.2m taking account of council-wide provision for contract inflation and costs. The service is managing staffing vacancies to offset this pressure and will seek to conclude the year with a balanced budget. Further to the previous response, of the £0.5m reported at period 6, £300k of it was increased contract costs. The projected contract pressure is a combination of actual increased costs where contracts have been renewed and estimates based on predictions of those to be renewed later in the year. We cannot easily differentiate in this between inflation and exchange rates. E.g. an overseas supplier prices in pounds and may include a combination of exchange costs and inflation pricing to determine their final price. Examples of this are AWS – Amazon Web services and SAP (our financial and HR management system). Or a UK reseller pricing in £'s against the $ such as our Core Enterprise agreement and Security (the Council's Firewall). A core enterprise agreement is a commercial business agreement usually covering licenses and support for the core operating systems such as Microsoft used by the Council. A single vendor may have multiple types of licences to permit access to different resources, functionality, and services. We can however break down the £300k increased contract cost into the following categories and applications: The major contributing factors were increased costs of the Core Enterprise agreement - Circa £129k, related to Microsoft licence, costs and use. In addition: Firewall Costs * Council Security £28k Sonus Voice appliance support £4k Off Site Backup and storage £4k				

	IT Managed service Contracts for Maintenance (Managed on behalf of Services) - £50k increased contract costs: AutoCAD £10k Carevision £1k Adobe £1k Cipfa (FinanceMgt) £0.6k Express (Elections) £3.6k Home Finder £2.4k Modern .gov £1.2k MitreFinch (access mgt) £1.4k Redbox (Recording) £2k Wax (e-procurement) £5.6k Visual Files (Legal) £1.2k View City £3k Misc Small Contracts £16k IT Managed Services - £86k increased contract costs: Rev and Ben (Iworld) – £20k Parking £5k Web Hosting £14k SAP £47k Officers from Strategic Procurement, Finance and Digital services could meet with members to provide a more informed briefing as to how contracts are managed across the Council; of which digital services have approx. 300 contracts.				
MTFS Savings Tracker					
Recommendation 3 PL20/9	Full cost recovery of matchday cleansing service	None	The Committee considered the use of Council taxpayers funds to meet the costs of matchday cleansing services to be unacceptable and recommended that the Council continues to urgent pursue negotiations with Tottenham Hotspur Football Club to secure full cost recovery of all matchday cleansing service,	Yes – response to be added below	Agreed

			including recovery of funds retrospectively for costs incurred in previous years since the opening of the new stadium.		
Cabinet Response to Recommendation 3	For all major football and non football events, THFC undertakes an element of its own cleansing activities within the immediate surrounding areas. The level of resource provided by THFC is currently under discussion as the Council is still providing cleansing resources over and above cleansing carried out by THFC to ensure the area around the stadium is cleansed to an acceptable level of cleanliness pre, during and post matches.				
Recommendation 4 N/A	Digital Together	None.	The Committee noted that this proposal involved a substantive sum of money but that over 90% of the savings in 2023/24 had not yet been achieved. The Committee further noted that the savings needed to be achieved on a cross-cutting basis with all service departments adopting more efficient systems and processes. The Committee recommended that the Cabinet explain how each service department will be engaging with this proposal in order to achieve the savings over the MTFS period.	Yes Response to be added below	Agreed
Cabinet Response to Recommendation 4	The Council has struggled to make this saving historically for a number of reasons – a lack of a pipeline of automation ideas and projects, a lack of the requisite skills in-house to develop new systems and processes, and a lack of an incentive for service departments to offer up processes to create the pipeline in the first place. The first has begun to be created as a result of Budget Fortnight. An initial team has been created to address the second and the restructure underway in Digital Services will build sufficient capacity for the longer-term. A proposal will be brought forward for how the savings can be achieved over the period with all service departments incentivised to play their part, following engagement with services and senior management.				

Children and Young People's Panel – Children's Services					
Ref	**MTFS Proposal**	**Further info requested by the Panel (if appropriate)**	**Comments/Recommendation**	**Cabinet Response Req'd (Yes/No)**	**Agreed/ Not Agreed/ Partially agreed**
Recommendation 5		None	The Panel was concerned about the budget gap of £16.4M reported in the draft MTFS and the fact that no further information is available at this stage on where further savings will be coming from. The Panel seeks assurances from Cabinet that it will seek to protect key non statutory services within Children's Services from any further cuts.	Yes – response to be added below	Agreed
Cabinet Response to Recommendation 5	Children's services always works within the council to ensure that we continue providing services within the budget envelope. At the time of writing, members will know that the proposed 2024/25 Budget is balanced, however there				

	are still significant financial challenges ahead therefore no part of the council can be protected through our continued drive to reduce down costs.

Adults & Health Scrutiny Panel					
Ref	**MTFS Proposal**	**Further info requested by the Panel (if appropriate)**	**Comments/Recommendation**	**Cabinet Response Req'd (Yes/No)**	**Agreed/ Not Agreed/Partially agreed**
General Issues					
Recommendation 6 N/A		None	The Panel seeks assurances from Cabinet that the pressures on the Adult Social Care budget would not impact negatively on the quality of care as new contracts were negotiated.	Yes response to be added below	Agreed

Cabinet Response to Recommendation 6	Haringey is committed to paying sustainable fee rates and fee rates are negotiated on this basis. Haringey's recently launched adult social care Quality Assurance and Contract Monitoring Framework will ensure regular contract monitoring and quality assurance and on-site provider visits. This will enable a more proactive approach to addressing and resolving contractual performance and quality assurance issues.

Housing, Planning and Development Scrutiny Panel					
Ref	**MTFS Proposal**	**Further info requested if appropriate)**	**Comments/Recommendation**	**Cabinet Response Req'd (Yes/No)**	**Agreed / Not Agreed/ Partially Agreed**
Request for Additional Investment					
Recommendation 7	Additional investment in landscaping and green space maintenance on new build developments	The Panel request clarification about whether additional funding for maintaining communal green spaces in our new housing developments could come out of the HRA, rather than the revenue budget, which is facing significant pressures. **Response:** The HRA is the revenue budget for Housing. Additional landscaping works would come out of the HRA budget, rather than the GF revenue budget.	The Panel welcomes the standard of landscaping and green space provision that has been put in place for our new build housing developments. The Panel would like to see additional investment put into maintaining the high standard of landscaping, so that it does not fall into disrepair or become overgrown. Given the amount of investment the Council has put into its housebuilding programme, maintaining the surrounding green spaces is an important part of their upkeep and ensuring those sites are attractive. Consideration should be given to securing additional resources to undertake additional maintenance of communal green spaces on new developments, including cutting back overgrown foliage, weeding and maintaining flower beds.	Yes – cabinet Response to be added below	Partially Agreed

Cabinet Response to Recommendation 7	The Council is currently reviewing its arrangements for the management of new build housing. Maintaining the high quality green spaces that have been developed will be an important consideration in new arrangements moving forwards. However, given the incredibly constrained environment the HRA is operating in, there is unlikely to be additional funding committed in this area.

Climate, Community Safety and Culture Scrutiny Panel					
Ref	**MTFS Proposal**	**Further info requested if appropriate**	**Comments/Recommendation**	**Cabinet Response Req'd (Yes/No)**	**Agreed** **Not Agreed** **Partially Agreed**
New Savings Proposals					
Recommendation 8 CSE24_SAV_003	The proposal is to stop providing hard copy newspapers and magazines in libraries. Newspapers and magazines are now available on Pressreader which provides thousands of newspapers and	None	Given the impact the proposed savings would have on elderly citizens and citizens accessing papers in community languages together with the social benefits that this provision of hard copy newspapers provided, the Panel recommended that this saving not be taken forward.	Yes – Cabinet Response to be added below	Partially Agreed

	magazines from around the globe. Many library services that stopped newspapers and magazines during COVID lockdown have not reintroduced them.				
Cabinet Response to Recommendation 8	We will seek to identify a limited number of hard copy titles that can be retained within existing resources, based on usage. It is worth noting that Press Reader enables residents to read many more titles, including those from around the world, than we would ever be able to stock in hard copy, and this is particularly valuable for residents for whom English is not their first language.				
Recommendation 9 CSE24_SAV_001	The use of our libraries varies from one branch to another at different time of the day. Based on footfall analysis we know that library use is typically lowest in mornings. Young people in particular have a need for study space in the evenings and libraries are ideal as a free and safe community space. We want to look at varying the opening hours of our libraries to times when they are	None.	The Panel would like Cabinet to reconsider this saving. The Panel would not like to see any reduction in Library opening hours and the net saving found from elsewhere.	Yes	Not agreed

	most heavily used, which could include later in the evenings, allowing us to allocate resources in a more targeted way. Library buildings and facilities could be made available to other services even when the library service itself is not operating e.g., Community Hub teams and VCS organisations. The proposed saving is based on reviewing hours at the six branch libraries with a mixture of mornings and afternoons opening times based on demand and demographics, to ensure libraries remain accessible to all. The service is currently carrying some vacancies and agency cover which will reduce the need for any proposed redundancies. No library building would be closed.				

Response to Recommendation 9	Cabinet recognises the value that libraries have for our communities, however the scale of the financial challenge we face reduces our options. Significant savings are already being found in other services as well, and we have to ensure we can meet our statutory obligations, including those to the most vulnerable, as well as set a balanced budget. We have already started engaging with Friends of Libraries groups on behalf of local users on the options and will be discussing detailed proposals on the changes to opening hours for each library with them.				
Recommendation 10 CSE24_SAV_001	As above		If library opening hours were reduced, the Cabinet should give assurance that it intended to engage robustly with schools, early years users, and local groups to explore options on how to keep Library buildings open at the appropriate times for these users. Also, to provide more information on 'wrap around' services that could be provided in Library buildings from other council services outside of the Library opening times. The Cabinet response should also indicate if the service had considered other ways to generate income into libraries by potentially looking at hiring out spaces before putting this saving forward.	Yes, to be set out below	Agreed

Cabinet Response to Recommendation 10	We have already started engaging with Friends of Libraries groups on behalf of local users on the options and will be discussing detailed proposals on the changes to opening hours for each library with them. The proposal to develop Community Hubs elsewhere in the final MTFS report presents opportunities for other services to be delivered from library buildings, including advice services, preventative outreach services and early years. The Library service already has an income target of more than £400k a year, which it has historically struggled to achieve, even before Covid-19. This year we are closer to achieving it than in any previous year, thanks to the significant efforts by staff and the capital investment into branches to improve accessibility and lettings. We will continue to work on income generation as a priority and as part of the proposed new libraries strategy.				
Recommendation 11 CSE24_SAV_001			The Overview and Scrutiny Committee recognise the need to make savings to balance the budget and that there are not easy savings to make and not making this associated saving will have an impact on other areas of the budget. Assurance is sought from Cabinet on measures to mitigate impact of reduced library hours on service users including that, individually, the libraries remain open at times of the highest usage and each library is assessed, on a case by case basis, to understand what this peak user time is. Also ensuring that the library opening times are compiled in a way that allows a user to use a library	Yes to be set out below	Agreed

			that is in reasonable close reach, if one local library is not open when they need to use it.		
Cabinet Response to Recommendation 11	We have already started engaging with Friends of Libraries groups on behalf of local users on the options and will be discussing detailed proposals on the changes to opening hours for each library with them. We will be looking at usage and footfall data to ensure we keep libraries open at the times of highest usage. We are exploring a neighbourhood cluster approach that will maximise the availability of library opening hours within reasonable reach even if the most local library is not open when a resident wants to use it.				
Ref	**MTFS Proposal**	**Further info requested if appropriate**	**Comments/Recommendation**	**Cabinet Response Req'd (Yes/No)**	**Agreed/ Not Agreed Partially Agreed**
Format of budget scrutiny papers					
Recommendation 12	N/A	None	The Committee welcomed the updated format of the budget scrutiny papers and requested the following updates for future years: a) A short piece of introductory text for each table (in the main report) to explain how they related to one another. b) Additional explanatory text on the capital budget appendix, including the	Yes to be set out below	Agreed

			impact on the revenue budget in terms of interest incurred. c) Additional discussions between the Assistant Director for Finance and the Chair of the Housing, Planning & Development Scrutiny Panel on the format of appendices and reports for this Panel. d) Concerning the agreed capital expenditure programme, where there are mixed sources of funding supporting a scheme, this should be set out more fully and in more detail. e) Reductions in the Capital Programme should be set out separately in a tabular format, rather than being embedded in the MTFS report. The table should include brief information on the individual scheme and the impact it has on the Council's aims and ambitions. The table should further indicate			
		In the budget compilation exercise, there had been an assessment of capital schemes that: had a risk of not being self-financing and				

		those which were not deemed essential, and projects that could be re-profiled, resulting in £400m reduction in borrowing for capital that could in future years impact on the General Fund and have revenue implications. Information on this was embedded in the MTFS report	whether the decision involves a reduction in the scope of a particular program with figures included or whether this is a capital scheme that has been discontinued; making clear whether it was a particular line that was in the capital budget in the previous year and has now been deleted.			
Cabinet Response to Recommendation 12	It is recognised that the MTFS is by its nature a complex paper describing a huge range of financial planning changes made necessary by national and local developments. Officers continually strive to make the report as understandable and comprehensive as they can supplemented by appropriate briefings. Officers have sort to address useful feedback from Overview and Scrutiny in this and previous cycles and will do so again in the production of next years report.					

Equality Impact Assessment
2024-25 Budget and 2024-2029 Medium Term Financial Strategy
January 2024

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1. Introduction

1.1. Purpose of report

This report considers the implications of the proposals in the **2024-25 Budget and 2024-2029 Medium Term Financial Strategy** (MTFS) report on people who share the protected characteristics as defined in the Equality Act 2010.

Where relevant, service areas have carried out EqIAs for each individual MTFS proposal. This report considers the impacts of the proposals, including the ways in which any negative impacts might be minimised or avoided. In addition, this report considers the wider context internal and external to Haringey Council in terms of potential equalities impact.

1.2. Public Sector Equality Duty

The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share the protected characteristics and those who do not
- Foster good relations between people who share the protected characteristics and those who do not

The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty. These are sometimes referred to as the three aims or arms of the general equality duty.

Further information about the process for assessing the equalities implications for decisions taken by Haringey Council is available on the Haringey website.

1.3. Equalities profile of Haringey

According to the 2021 census, which is at this point in time our most reliable source of socio-demographic data, the total population of the borough is 264,238.

In terms of equality, demographics break down as follows:

Sex:

- There is a relatively equal split by sex in Haringey, just over half of the population is female (51.8%), in line with England and London.

Age:

- Haringey has a relatively young population with just under a quarter of the population under the age of 20.
- 89% of the population is aged under 65 (88% London; 81% England).

Ethnicity:

- In 2021, Haringey's population of 264,238 comprised 150,581 (57%) White, 23,080 (8.7%) Asian, 46,466 (17.6%) Black, 18,556 (7%) Mixed or multiple ethnicities and 25,555 (9.7%) Other ethnic groups
- Black, Asian, Mixed and Other ethnicities made up almost half (43%) the total of Haringey's population in 2021, ranking it the 24th most diverse local authority in the country (19th highest in London).
- The largest growth in population over the decade was in Other ethnic group which more than doubled by 13,500 (4.9%), increasing its share from 4.7% in 2011 to 9.7% in 2021. Mixed or multiple ethnicities also recorded a nominal increase of 0.5%.

Religion:

- Almost two-fifths (39.3%, 103,944) of people in Haringey reported their religion as Christian. There were 33,295 Muslims (12.6%), 9,397 Jewish (3.6%), 3,529, Hindus (1.3%), and 6,164 (2.3%) who reported another religion. Almost a third (31.6%, 83,535) of people stated no religion and 21,027 people (8%) chose not to answer.
- Haringey's Jewish population (3.6%) is more than double London's (1.7%)

Disability:

- In 2021, in Haringey, the proportion of disabled people was 16.6%, slightly above that for London (15.6%) and just below England & wales (17.8%)
- Haringey has the 12th highest percentage of disabled residents in London (16.6%) and the 10th highest percentage of residents whos day-to-day activities are limited a lot (7.9%)

Marital Status and Civil Partnership:

- The number of people in marriage or civil partnerships (72,881, 33.7%) has remained largely unchanged (0.1% decrease) since 2011. Those reported as separated, but still legally married or still legally in a civil partnership fell slightly by 1.2% from 8,066 in 2011 to 6,035 in 2021. Divorced or civil partnership dissolved and widowed or surviving civil partnership partner comprise 8.2% and 3.5% respectively

Sexual Orientation:

- 12,167 (5.6%) people identified with an LGB+ orientation (“Gay or Lesbian”, “Bisexual” or “Other sexual orientation”); 5,912 people (2.7%), 4,503 (2.1%) and 1,752 (0.8%) respectively, all with higher percentages than both London and England & Wales

Gender reassignment:

- A total of 1,377 people (0.6%) answered “No”, indicating that their gender identity was different from their sex registered at birth. Within this group:
  - 389 (0.2%) identified as a trans man
  - 383 (0.2%) identified as a trans woman
  - 537 (0.2%) identified as another gender identity

2. Equalities context in Haringey

The impact of the budget proposals on equalities should be seen within the context of residents' lives in Haringey. Longstanding inequalities persist in Haringey as they do nationally and globally. In recent years global events, like the COVID-19 pandemic, inflation and war have impacted on people living in the borough by perpetuating health and economic inequalities and driving community tensions and hate crime.

The primary equality challenge in the last year has been the impact of the cost-of-living crisis on residents. The cost-of-living crisis has compounded economic disadvantage, which often interacts with lack of equal opportunities and discrimination faced by individuals with protected characteristics, notably for disabled people, young people from lower socioeconomic backgrounds, and Black, Asian and minority ethnic residents more likely to live in our more deprived wards and experience employment gaps.

The cost-of-living crisis followed on from the economic fallout from COVID-19, which saw the number of jobseekers in the borough more than double. 6.8% of residents aged 16+ were claiming unemployment-related benefits in Haringey in December 2023, i.e. 13,000 people. The third highest rate in London. 19.9% of residents aged 16-65 were claiming Universal Credit in Haringey in Aug 2023, i.e. close to 38,000 people.

Haringey workers and residents tend to earn less than average; median hourly pay among Haringey workers is below statistical neighbour and London rates, while the proportion of residents earning below the London Living Wage is higher.

Haringey has a higher than average number and rate of children living in poverty. Children in the east of the borough are substantially more likely to be affected by income deprivation than those in the west.

Haringey is the 4th most deprived borough in London, with deprivation more concentrated in the north east. Relative deprivation has reduced since 2015, though Haringey's London ranking has not shifted significantly.

There are significant gaps in healthy life expectancy according to relative socioeconomic deprivation in Haringey: the gap in healthy years of life between richest and poorest deciles is 15 years for men and 17 years for women.

3. Budget Setting Context

3.1. Context for the Budget/MTFS

The proposals in this budget have been developed against a backdrop of budget pressures for councils across the country, with significant national scrutiny now being given to the pressures created for councils by social care and temporary accommodation demand. Whilst inflation is lower than this time last year, residents and businesses and the council have seen significant increases in costs because of the cost-of-living crisis and price increases from suppliers in the last two years.

The council recognises that this is a challenging time for our residents, businesses and communities and this budget has been developed in this context, seeking to achieve the best possible outcomes with the limited resources available to us.

Given the significant financial challenge we face as a council, this budget presents difficult decisions which may have potential negative impacts on individuals with protected characteristics. Where negative impacts are likely, EQIAs will be developed in line with the proposal and mitigating actions will be taken.

3.2. Council Tax

- A 2.99% increase in Council Tax in 2024/25 after which it reduces to 1.99% across the MTFS period.
- A 2% increase in ASC Precept for 2024/25 after which it is assumed to discontinue.

The Council Tax Reduction Scheme will provide financial assistance with Council Tax bills for residents who are on a low income or less able to pay.

3.3. HRA: Social Housing rents

Rents in existing homes 7.7% (September 2023 CPI 6.7% + 1%), compared with last year where government capped at 7%.

New rents will be subject to the formula rent and the 5% flexibility allowed (but not where commitments are in place as set out in the landlord offer on Broadwater Farm and High Road West or those at London Affordable Rent).

Service charges are charged to recover the cost of the service. Most increases in service charges are below 10%. Service charges are covered by housing benefit and Universal Credit, so any tenant in receipt of these benefits will have these costs covered.

3.4. Tackling inequality

Haringey Council's Corporate Delivery Plan 2022/23 and 2023/24 commits the council to tackling inequalities as a central objective in everything we do.

This is about recognising that:

- we need to use the levers available to us to reduce poverty and economic inequality in the borough and mitigate its worst impacts.
- some groups of residents experience unacceptable structural inequalities related to their protected characteristics and circumstances.
- as we respond to the climate emergency, we understand that there are some residents and communities who will need to be supported to secure a just transition to net zero – and who will be more affected by the impacts of climate change
- social inequalities drive the unacceptable health inequalities which have been all too starkly thrown into relief in the last two years.

The objective of reducing inequality needs to influence how we work with all our communities, target our resources, support and develop our workforce, design our services, and mobilise around key issues.

In this Budget/MTFS the council has sought to promote equality by meeting increased cost pressures in adult social care, children's social care and temporary accommodation caused by inflation to ensure we continue to support our most vulnerable residents and meet our statutory obligations, bringing our leisure services in-house to deliver a range of health and wellbeing benefits for residents and continued investment in capital projects that bring a range of social and economic benefits.

Key investments in the capital programme with equalities implications

- Investment in the schools estate
- Investment in Pendarren House so that more Haringey children can enjoy a stay there

- Investment in ICT for Community Hubs to enable users to access a range of services, likely to benefit those digitally excluded including older residents, disabled people and those of lower socioeconomic status
- Investment in the Active Life in Parks budget to bring a range of health and wellbeing benefits to residents
- Investment in street lighting and the borough's roads with benefits for improved safety and accessibility

4. Assessing impact of MTFS proposals on equalities

The table below shows the detail of all of the MTFS policy proposals, noting where the requirement for a full Equalities Impact Assessment has been identified and, where potential equalities implications are anticipated, a summary of the findings.

Adults, Health and Communities

Proposal	Full EQIA conducted?	Positive Impacts anticipated	Negative Impacts anticipated	Mitigating actions anticipated
Growth				
Inflation increases in adults social care costs – This proposal reflected the impact of inflationary increases in adults social care costs as well as the increased cost of children transitioning to Adults Social Care services (£16.3m 24/25).	An EQIA is not required.	This growth proposal is to account for the increased costs of care. This additional investment allows for those needing adult social care, including disabled adults, to receive appropriate care according to need.	No negative impacts are anticipated.	None.
The demand for temporary accommodation (TA) has also increased along with an increase in inflationary pressure in this area (£3.0m 24/25).	An EQIA is not required.	This growth proposal allows us to meet increased costs for TA – supporting residents who are experiencing homelessness. 40% of residents accepted as statutory homeless are Black, while 25% of youth homeless are LGBT, an overrepresentation compared to the wider borough population. Nearly two thirds of households living in temporary	No negative impacts are anticipated	None

		accommodation are Black, Asian or from another minority ethnic group. This proposal is thus more likely to have positive equalities implications for individuals from Black and minority ethnic groups and LGBTQ+ individuals.		
Community Alarms – Unfunded Service. Assistive Technology provides significant opportunities to support and enable residents to live independently and safely in their own homes, undertaking key tasks, reminders and calling for assistance in an emergency. The cost of the service has exponentially grown and in addition the Analogue to Digital impact has lead to on average 250% increase in equipment costs. This proposal seeks to outsource the 24hr part of the service and realign and redesign remaining functions to the localities model, as well as developing the AT development capability. It is anticipated that whilst this will mitigate a significant proportion of the costs there will remain a deficit and also does not allow us to develop and deploy the Assistive Technology opportunities. There are considerable avoidable costs opportunities in regards to AT being deployed alongside the improved outcomes.	Full EQIA will be required for Service and Staffing and will be subject to consultation following final decision and will be finalised at that time.	We expect an improved service to benefit older residents and those with care needs. Benefits will be an enhanced 24/7 monitoring and responding service that will include lifting and therefore providing better outcomes for residents. It will also increase our ability with the use of Assistive Technology to deliver improved outcomes and avoidable costs associated with progression of care needs.	No negative impacts are anticipated	N/A
Savings				
Identify additional site for homelessness accommodation. Identify an additional site for additional modular Lodge provision to ease pressure on Temporary Accommodation, with the aim of providing 60 units of accommodation by mid-2026.	An EQIA is Not required	This proposal is to increase the supply of accommodation available to homeless households. Nearly two thirds of households living in temporary accommodation are Black, Asian or from another minority ethnic group.	No negative impacts are anticipated	N/A

		This proposal is thus more likely to have positive equalities implications for individuals from Black and minority ethnic groups.		
Expand existing Lodge provision for residents experiencing homelessness. Increase the supply of Lodge accommodation by 100 units. Conversion and extension of one of our existing hostels has been scoped. We are also pursuing the possibility of repurposing /developing other council owned buildings as temporary accommodation options. If we can identify further sites, there is scope to identify additional savings.to peripatetic housing support teams.	An EQIA is Not required	This proposal is to increase the supply of accommodation available to homeless households. Nearly two thirds of households living in temporary accommodation are Black, Asian or from another minority ethnic group. This proposal is thus more likely to have positive equalities implications for individuals from Black and minority ethnic groups.	No negative impacts are anticipated	N/A
Extend the eligibility criteria for use of one bedroom council homes as Temporary Accommodation. Use of one bed social housing as temporary accommodation for families with a baby or young child. There are more 1 bed social housing properties available than any other size – using a small proportion as Temporary Accommodation would reduce financial pressure. Our Annual Lettings Plan allows for 10 properties to be used for this purpose. This will be expanded to 15 and then 30 in 2023-24. Moves will particularly be focused to ensure people from Lodge accommodation are moved on, freeing up lodge vacancies.	An EQIA is not required	This proposal is to increase the supply of accommodation available to homeless households. This proposal is likely to benefit people with the protected characteristic of pregnancy/maternity and young children.	No negative impacts are anticipated	N/A
Use of ten of our two bed council properties for families in Temporary Accommodation. Use of two bed social housing as temporary accommodation for families – using a small proportion as Temporary Accommodation would reduce financial pressure. We intend to introduce this provision within our	An EQIA is not required	This proposal is to increase the supply of accommodation available to homeless households.	No negative impacts are anticipated	N/A

Annual Lettings Plan for 24/25 and allow for 10 properties to be used in this way. The focus will be on families who need to stay locally, thereby reducing any additional costs for other parts of the council due to care and support needs.		The increase in supply is likely to benefit children and young people.		
Supporting residents into permanent housing. We will work with residents to identify suitable accommodation to move on from Temporary Accommodation, ensure they are move ready and can settle successfully into the identified accommodation within the community.	An EQIA is not required	This proposal will support homeless residents to move on from Temporary Accommodation.	No negative impacts are anticipated	N/A
A new Project Officer to support residents into permanent housing. A Project Officer will be engaged to work with families to remove any barriers to moving on from temporary accommodation. Targeted casework will include but not limited to ensuring that housholds are ready to move and supporting households to bid realistically for social housing. This is envisaged to be a 2.5 to 3 year project that will benefit from new supply delivered through the new build programme.	An EQIA is not required	This proposal is to support homeless households to move on from temporary accommodation. The focus on families means the proposal is likely to benefit people with the protected characteristic of pregnancy/maternity and children.	No negative impacts are anticipated	N/A
Optimise Temporary Accommodation lease arrangements to reduce costs. Where leases are held by the Council, national Temporary Accommodation subsidy arrangements means we pay additional costs compared to if these leases were managed directly through our housing services. Transferring these leases will reduce costs to Council while ensuring that accommodation is within current Local Housing Allowance rates and affordable to residents.	An EQIA is not required	The proposal will reduce the cost of temporary accommodation to the Council which is offered to homeless households. While these include households with protected characteristics none are expected to be disproportionately affected by this proposal.	No negative impacts are anticipated as rents are within local housing allowance rates and an affordability assessment is conducted for each households considered for this type of accommodation.	N/A
Efficiency savings in delivery of young people's health and wellbeing services, while maintaining the front line service offer.	An EQIA is not required.	There are no positive impacts anticipated, however, research has shown that implementing more efficient ways of working	No negative impact anticipated, this is because there is no service restructure, or significant change	The 0-19 integrated PH service inputs and outcomes are closely monitored for any adverse impact - and

This proposal is to make savings of £300,000 from our existing contract for 0-19 year old integrated public health services. We will work with the provider on more efficient ways of working, while maintaining front line service offer for residents. Implementation period will be at least 6 months from sign off of council budget as then we will need to work with the provider. Implementation is expected by October 2024/25 with full year effect in 25/26.		have positive impact on delivery of services and its recipients.	which would destabilise the service at the point of delivery.	this includes the action taken by provider to ameliorate and address issues as they arise.
Modernisation in delivery of sexual health services. Through the pandemic and in the following period we learnt that many residents like to access sexual health services from community pharmacies and through online advice and testing services, which are less expensive than clinic based services and achieve good outcomes. This proposal continues to take this emphasis forward with a further shift to self service and pharmacy options without impacting outcomes for residents.	No – the direction of service provision is essentially remaining the same.	None	No negative impacts are anticipated. The savings are targeted at adult residents who are still routine testing for sexually transmitted infections via a sexual health clinic rather than via pharmacy or home testing. This proposal reflects a shift away from clinic-based services for adult residents without symptoms or not in a high-risk category for example men who have sex with men and sex workers. Community-specific outreach, HIV prevention and PREP, young people's focussed work and women's reproductive are protected.	None.
Income maximisation for Adult Social Care.	No EQIA required	This proposal is about further embedding and more effectively	None. Ultimately, taking a direct	None

Continuing Healthcare Is a funding stream that solely provides the full responsibility of a person's care on health services. Haringey receives the lowest Continuing Health Care funding in North Central London and is very low compared nationally, this project aims to fully imbed the Continuing Health Care process within Adult Social Care and gain a greater proportion of health funding. Ensuring residents are receiving the right level of funding for high/complex placements, expenditure for these placements would be picked up by health (fully health funded, joint funded and Funded Nursing Care). To increase the number of referrals for Continuing Health Care funding, to the North Central London Integrated Care Board and establish this as part of business as usual over the next year.		managing an existing process for the benefits of our residents. This proposal will not only provide efficiencies for the Care budget but also for self-funders. A comprehensive support offer is available to anyone considering or in receipt of a Direct Payment, delivered by Disability Action Haringey and the council's Direct Payment Team.	payment remains a personal choice and although we can promote and support individuals, they do not have to accept a DP.	
Move to a Direct Payments model of Social Care delivery where suitable for residents. When a person has care and support needs, there are many ways this can be delivered, one option is that we can Commission a provider directly to provide that care and support. Alternatively, direct payments are another methodology, and this can enable people to have more control on how their care is provided and help them to stay in their homes for longer. Using direct payments is more cost effective since they do not include the costs home care agencies charge on top of the price of care.	No EQIA is required	Direct payments promote choice, control and flexibility by enabling and empowering individuals to meet their well-being and care support outcomes. It also supports individuals to be able to remain independent as possible.	None are anticipated.	None
Adopting a Strength Based Working approach in Adult Social Care to help residents remain independent and connected to their community. Strength Based Working produces better outcomes for people and reduces strain on Adult Social Care services if residents are enabled to remain as independent as possible, strengthening people's ability to remain within the community. The Strength Based Working approach is a national agenda which supports residents to look within their community for care in the first instance. It enables social care to reduce service demand by working with our voluntary sector and really focusing on early intervention	No EQIA is required	This proposal is looking to identify and deploy tools that enhanced strength-based working. This will provide practitioners with improved ability to undertake assessments that lead to suitable outcomes for residents.	None are anticipated	None

and prevention. The use of digital tools supports Strength Based Working approach.				
Social Care Grant uplift. We are expecting to receive an uplift to the public health grant of £292k in 24/25, which can be directed to existing council priorities/spend which contribute to public health outcomes	No	We are tracking impacts of use of the grant on wider council activities. At this stage we do not anticipate changes in outcomes from an equalities perspective.	We are tracking impacts of use of the grant on wider council activities. At this stage we do not anticipate changes in outcomes from an equalities perspective.	We are planning allocation of the grant next year to ensure that we can maintain our range of services.
Invest in Supported Living to enable residents to stay at home and within their communities for longer, reducing reliance on nursing and residential placements. Supported living is when the residents remain in the community as independently as possible is enabled to claim housing benefit and their one-to-one care is provided. We want to contiue to improve the supported living offer within Haringey. Ensuring people can reside in the community with one-to-one provider delivered in their own home will reduce the cost. This will reduce the demand on expensive nursing and residential placements out of borough. Using digital tools, is key for the supported living model in Haringey.	No EQIA Required	This proposal seeks to develop and enhance an existing offer that will provide greater choice and opportunities to support residents.	None anticipated	None
Enhancing delivery of community-based care. Currently we support approximately 3500 people to remain independently in the community on a daily basis. By auditing provider services and ensuring that the service delivery is accurate and in line with the care and support plan, we will look to find efficiencies in the system. By utilising a personalised approach and reviewing what services are available within the community for early intervention and prevention, we may be able to reduce demand by working with our voluntary sector to deliver certain types of care and support, such as shopping and cleaning. By completing a financial review with residents, they may be entitled to some benefits that could support some of these activities.	Not required	Providing people with greater choice in sourcing support that they need. Potential for additional financial support to fund these.	None anticipated, those that are entitled to receive a service in accordance with the Care Act will continue to do so. Others will be supported and signposted to services within the community that could support them.	N/A

Review of Mental Health Services spending. We have externally commissioned an independent review of the Mental Health Services, the review highlighted significant evidence to support that Haringey is comparatively an outlier nationally for funding between the age of 18 -65. Steps are being taken to focus on a local delivery model. We are reviewing how we target our Mental Health spending. The review team are focusing on the high-cost placements, to ensure we are reviewing costly or out of borough packages of care and bring them back into a local provision of care.	An EQIA is not required	We will have full responsibility for our care act statutory work. Developing better strength-based assessments ensuring residents are receiving the right level of care at the right time, through their care journey. People will receive care and support closer to home within a locality. This will positively impact individuals with a disability.	No negative impact anticipated	None

Children's Services

Proposal	Full EQIA conducted?	Positive Impacts anticipated	Negative Impacts anticipated	Mitigating actions anticipated
Growth				
Children's Social Care cost pressure - £1m to cover the in-year pressure on care costs and £0.88m to cover forecast inflation for 2024/25 (less the £500K that was placed in the MTFS for growth in 24/25)	Not required	This growth proposal is to account for the increased costs of care. This additional investment allows for children and young people to receive appropriate care according to need.	None.	None.
Savings				
A new support and advice service for young people with Special Educational Needs and Disabilities.	EQIA to be completed at a later date	Disability – Promoting a smoother transition into adulthood for young people with SEND, with a multi-agency approach Promoting independence for young people with SEND	None	N/A

		Age – positive impacts for young people in promoting independence, education and employment.		
Capital				
EYES and Social Care developments to the LiquidLogic System	No	None	None	N/A
Further investment in Primary Sch - Major Capital Works (New Bid)	No	Investment in the schools estate will positively benefit children and young people.	None	N/A
Further investment in Secondary Sch - Major Capital Works (New Bid)		Investment in the schools estate will positively benefit children and young people.	None	N/A
Further investment in Pendarren House so that more Haringey children can experience a stay there	No	Investment in the Pendarren House will positively benefit children and young people.	None	N/A

Placemaking and Housing

Proposal	Full EQIA conducted?	Positive Impacts anticipated	Negative Impacts anticipated	Mitigating actions anticipated
Savings				
Commercial Portfolio and rental opportunities Rental and other commercial opportunities from the council's commercial portfolio	Not required	None	None	None

Property Disposals Property disposals to realise one-off Capital receipts to reduce borrowing in line with our Strategic Asset Management and Property Improvement Plan.	Not required	None	None as only individual business cases that identify sites, which are commercially viable will be taken forward	Individual site by site business case will identify any required mitigations.

Environment and Resident Experience

Proposal	Full EQIA conducted?	Positive Impacts anticipated	Negative Impacts anticipated	Mitigating actions anticipated
Growth				
Leisure - This growth reflects the forecast cost of the revised arrangements for delivering the Leisure management service in house.	Will be subject to a detailed EQIA informed by the resident engagement to take place early in 2024	To be determined	To be determined	To be determined
Expiry of current saving on Waste Fleet - The current time limited saving on waste fleet vehicles is due to expire from 2024/25 resulting in the need to reinstate a budget to cover this cost.	Full EqIA not required	None	**None**	N/A
Savings				
Standardising Fees & Charges Bringing Haringey's Fees & Charges in line with other comparable boroughs, ensuring operating costs are recovered and enforcement is cost effective.	EQIA concluded – see separate Fees and Charges Cabinet Report	The proposed charges are proportionate and justified because the costs of administering and enforcing the service have increased and we need to increase charges to recover those costs. This is in line with other neighbouring	All parking permit holders will be impacted by the proposed charge increase in that area. This is likely to impact those on low incomes,	There are discretionary schemes in place to mitigate negative impacts, with particular benefits to disabled and residents over 65.

		boroughs' charging policy. In addition to the need to ensure sufficient revenue to cover administration costs, evidence suggests parking pricing policy encourages the use of sustainable transport options. We therefore expect increases in parking charges to encourage sustainable transport which will improve air quality, which disproportionately negatively impacts residents of lower socioeconomic status.		
Expansion of School Streets programme. The continuation of the schools streets programme expansion is anticipated to generate an additional net income of £170k as a by-product of the enforcement activity associated with the scheme. Enforcement income can not be used as a revenue raiser and is reinvested for specified spend in streets, highways, and roads.	EQIA previously completed when programme commenced	Implementation of this programme anticipates lower air pollution levels in the vicinity of schools and increased uptake for active modes of travel to school. Therefore, the positive impacts are for everyone living and working in the vicinity of schools and those attending. The benefits are especially relevant for women (as primary carers) and children – both of whom benefit from lower air pollution and active travel. Less traffic during busy periods also anticipates lower traffic related injuries among children on school streets.	None	School streets operate during short time periods of the day and only during term-time (unlike LTNs). Disabled blue-badge permit holders and statutory and emergency services have exemptions applicable to carry out their usual activities. And residents' vehicles can leave school streets during operational times.
Increased enforcement on environmental crime. Enhance our enforcement on environmental crime (ie flytipping, littering and waste licensing) by reconfiguring the team and deploying additional	An EqIA is anticipated to be conducted in the case where there is	There are anticipated positive impacts on health and wellbeing as well as mobility for residents as a result of better enforcement. A cleaner	There are no anticipated negative impacts on particular groups as a	Impacts would be monitored and mitigations put in place accordingly.

resources to meet residents demand for a cleaner borough. Effective enforcement provides funds that allow the Council to maintain street cleanliness.	substantial reconfiguration of the team and anticipated inequalities for protected groups.	neighbourhood also encourages better use of public spaces for the resident communities and better mobility for those disabled residents who require it. Revenue from enforcement could also be used for better service provision in the borough.	result of better enforcement.	
Income maximisation at New River Sports Centre to improve the offer to all residents. Following insourcing of this service, we have an opportunity to maximise the resident experience. This will take the form of reduction in energy use, a review of concessionary spend, upgrades to the equipment, and additional activities.	No. The cost reductions proposed currently have no reliance on savings arising from the concessionary discounts review. If any changes are to progress, they will be addressed by an EqIA at the relevant time.	Anticipated positive outcomes are in the nature of better health and wellbeing for residents through increased customer base as well as technological improvements for existing users.	The review of concessionary discounts, which may have a negative impact on those with lower socio-economic backgrounds, are not part of the savings proposals currently. If any negative impacts are discovered during conducting the EqIA, they would be addressed through it.	Would be addressed through the EQIA.
Enforcement against breaches against the Housing Act . Housing Act enforcement- Breaches to the Housing Act 2004 such as unlicenced premises can result in a Civil Penalty Notice of up to £30k and in addition, improvement Notices can be served on the person in control of the property and a charge made for that improvement Notice. The council can use revenue from fines to help cover the wider cost of enforcement activity in this service area	No. Civil Penalty fines Notices are a statutory process and the equalities impact was considered when introduced by cabinet Agenda item - Property	Yes. The impact of Enforcement acts as deterrent to poor housing conditions including damp and mould.	None identified	Civil Penalties and charges are only made as a last resort. Each case will be considered on its merit

	Licensing Designation | Haringey Council			
Council Tax Reduction Scheme Review A review of the Council Tax Reduction Scheme and anticipated base of recipients following residents migrating to Universal Credit and changing demographics. This will require public consultation on any proposed changes following the review.	An EQIA will be developed alongside the proposal	The detail of the proposal is not yet known.	Dependent on development of the scheme but potential negative impacts on individuals more likely to be within the Council Tax Reduction Scheme currently, specifically those experiencing socioeconomic disadvantage.	To be determined. Appropriate mitigations will be sought where negative implications are found.
New Traffic Filter Schemes Camera enforcement to address non-conformance of vehicle restrictions that seek to improve the residential environment.	To be undertaken at scheme development stage.	Currently unknown pending EQIA.	Currently unknown pending EQIA.	Unknown
Pay & Display Tariff for EV charging Helping to increase access to electric vehicle charge points by applying a parking tariff for the time needed	EQIA will be undertaken on development of the Parking Policy decision report.	Anticipated positive benefits for all residents from improved access to these facilities. There are neutral impacts anticipated on groups with protected characteristics.	None anticipated	Mitigations would be planned based on the EqIA.
Stop resetting the initial discount period following PCN challenges	No	None	None	N/A
Redesign Tennis Court Charging	This saving proposal will	Currently unknown pending EQIA.	Currently unknown pending EQIA.	Unknown

Applying a more consistent cross-borough charging regime to offset ongoing maintenance costs, albeit with potential concessions	form part of the leisure service insourcing project work for which an EqIA will follow			
Events in parks Expand the range and scope of events in parks to increase community participation and cohesion	Not required as this merely represents an expansion of current activity. An EqIA will be generated if any specific new event warrants an EqIA.	Events in parks have anticipated positive impacts on communities around the park and contribute towards better relationships within the communities participating. In general, it is anticipated that they have a positive impact on the wellbeing and cohesion within communities in the borough and positively impact those with protected characteristics.	Based on the space needed and nature of the events, some events may negatively impact particular groups like children and women or disabled users. Mitigations are put in place based on anticipated negative impacts. Events follow the guidelines in the Council's Outdoor Events Policy.	Events and EqIAs specific to each category identify and mitigate the impacts on groups with protected characteristics.

Culture, Strategy & Engagement

Proposal	Full EQIA conducted?	Positive Impacts anticipated	Negative Impacts anticipated	Mitigating actions anticipated
Growth				
Growth for re-evaluated senior management roles *(Corporate)*	No	None	None	N/A
Cost increases for digital infrastructure - This proposal reflects a range of cost increases associated with digital infrastructure, including to respond to the National 'Big Switchoff'; Audio Visual equipment; Council's internal case management software (Halo); Microsoft E5, Cyber Security.	No	None	None	N/A

Savings				
Variation to library opening times based on analysis of use. The use of our libraries varies from one branch to another at different time of the day. Based on footfall analysis we know that library use is typically lowest in mornings. Young people in particular have a need for study space in the evenings and libraries are ideal as a free and safe community space. We want to look at varying the opening hours of our libraries to times when they are most heavily used, which could include later in the evenings, allowing us to allocate resources in a more targeted way. Library buildings and facilities could be made available to other services even when the library service itself is not operating e.g., Community Hub teams and Voluntary Community Sector organisations. The proposed saving is based on reviewing hours at the six branch libraries with a mixture of mornings and afternoons opening times based on demand and demographics, to ensure libraries remain accessible to all. The service is currently carrying some vacancies and agency cover which will reduce the need for any proposed redundancies. No library building would be closed.	Not currently. To be completed at a later date.	**Age** Potential positive benefits to young people who have a particular need for study space in the evenings. **Enhanced Community Services**: Making library buildings and facilities available to other services, such as Community Hub teams and Voluntary Community Sector organisations, during non-library hours, expands the utilisation of public spaces and contributes to community development. Depending on the services utilising the space during these hours, this may bring benefit to those most likely to receive their support including disabled people, older people and those of lower socioeconomic status.	**Age** From a total of approx. 43000 users, 49.1% of registered library users are children and young people (< 25 years old) and utilise our libraries more than any other age group. They are likely to be more impacted by the reduction in hours, followed by registered adult users (aged between 25 to 64) as they total 45.7% of our users). Geographically in Haringey, libraries that are located in the east side of the borough (Marcus Garvey, Coombes Croft and St Ann's) have the percentage of young users (42%), followed by those libraries in a central location (Wood Green, Alexandra Park and Stroud Green & Harringay). These users are likely to be the most impacted by the reduction in hours. They utilise libraries more than any other age group, often for studying and	A full EQIA will be produced as the proposal is developed to ensure the impacts on the protected characteristics are explored in full and mitigations are set out accordingly. **Consultation** We will work with the groups identified to understand how we can meet the objectives of the proposal whilst ensuring library services remain accessible and able to achieve our statutory duty as a public library service. **Data** The library service recognises that not all library users are registered as it is not a requirement to enjoy the facilities or participate in events. Therefore, the equality data is based on those who have registered to obtain a library card. The library service

			accessing educational resources. Reduced hours could limit their access to these resources and potentially impact their educational outcomes however the revised library hours will seek to mitigate against this risk and potentially provide new opportunities in evenings. **Disability** The library service recognises that data registered on disabled users is limited as only 0.2% have provided details of disability. However, it is anticipated that disabled & older people may be less likely to attend in the evenings. **Sex -** From a total of approx. 43000 users, 58% of users identify themselves as female so this will impact more females than males (40%). **Pregnancy and maternity** – many accessing early morning services are parents and carers with young children	anticipates that 50% of users are unregistered and is not reflected in the data. During consultation, a focus will be to ensure all users have an opportunity to feedback on the proposals. In addition, the library management system, which hosts the equality data, is limited. Therefore not all protected characteristics are recorded. The service acknowledges that this will need to be included as a priority in future service delivery plans. While the proposal aims to ensure libraries remain accessible to all, changes in opening hours may still pose challenges for some users. Certain groups, particularly those who prefer morning library visits, might find the adjusted hours less convenient or

			and babies. Services will still be delivered to these groups. **Socioeconomic status** – libraries provide a cost-free space to access books, educational materials, IT devices and more. This free access is of outsized importance to residents of lower socioeconomic status who may be unable to purchase these items. Reductions in hours may limit access to these tools and materials for residents of lower socioeconomic status.	impossible. The library service recognises that many accessing our libraries early mornings are parents and carers with young children and babies, and elderly groups. This is likely as each library host tailored events for these groups such as story time for under 5s, coffee mornings for older people and digital skills training for all ages. Events will continue to be delivered and will review time offerings to these groups and should be geographically balanced. The service will review equalities data as we go along the proposals.
Work with residents to develop a Libraries Strategy for Haringey to ensure we have the most efficient and effective operating model. Five years ago an LGA Libraries Peer Review recommended that Haringey produce a Libraries Strategy. Due to the pandemic this work was not carried out, although other	Not currently. To be completed at a later date.	**Extended Access** Self-service technology enables registered users to access library services beyond traditional operating hours and/or can balance the reduction of staffed hours.	**Registered user access-only** Only around an estimated 50% of library visitors are currently registered. Under this proposal, only those with a library card	A full EQIA will be produced as the proposal is developed to ensure the impacts on the protected characteristics are explored in full and

recommendations from the review were taken forward such as the Branch Libraries Investment Programme which has greatly improved the accessibility and quality of our branch libraries. During 2024/25 we will consult and engage widely on creation of a Libraries Strategy for Haringey, which will safeguard and develop our libraries offer for the longer term. The strategy will seek to identify and capitalise on a number of new opportunities that are available to develop and maximise the use of our libraries as critical, public, community and social assets, including the Community Hubs programme, creation of a Culture Strategy and taking a more commercial approach to generate additional income to support the Council's work. The strategy will explore all options available to us to ensure the financial sustainability of the library service for the future within the reduced council funding envelope available, by identifying alternative funding sources, generating more income and ensuring we have the most efficient and effective operating model for the service.		This extended access can cater to individuals with busy schedules who may not be able to visit during regular staffed hours such as those who work full time or day shifts and young people who have a need for somewhere to study in the evenings and libraries are ideal as a free and safe community space to work in. Our data shows that the need to create space for young people is greater on the east side of the borough (Marcus Garvey, Coombes Croft and St Ann's) which are also our more deprived wards – with potential positive implications for young people of lower socioeconomic status. **Community Engagement** If combined with a community-run library service option, the proposal can foster community engagement. Involving local communities in the operation of the library may potentially create a sense of ownership and strengthen community ties.	will be able to enter a library building as they will use the card details. Those without library cards will be excluded during the unstaffed hours. We recognise some who are not registered visit the library service to combat loneliness. This has the potential to impact more vulnerable residents with greater social needs and those experiencing isolation including disabled people **Age limit** Self-service during unstaffed hours would also be limited to those under 16 (*specific age to be determined)* for safeguarding reasons. **Confidence** It is anticipated that disabled and elderly users may be less likely to attend during unstaffed hours. **Safety concerns** Those with less confidence to attend during self-serve hours due to concerns about safety during non-staffed	mitigations are set out accordingly. We will work to understand resident concerns about accessibility needs and safety in the development of the proposal. The library service is considering the option to retain as much as possible the traditional hours at the main libraries (Wood Green, Hornsey and Marcus Garvey). In addition, ratio between staffed and unstaffed hours at the branches (Alexandra Park, Coombes Croft, Muswell Hill, St Ann's and Stroud Green & Harringay) would be geographically balanced to ensure users can access libraries in proximity. For example, St Ann's and Coombes Croft would avoid reducing the same operating hours. The library service will work with groups

			hours including women, young people and LGBT people. **Digital Divide Concerns** Introducing self-service technology assumes that library users have access to digital devices and are comfortable using them. This may exclude individuals who are not tech-savvy, have accessibility needs or do not have reliable internet access, widening the digital divide especially in the parts of the borough with higher levels of socioeconomic disadvantages who rely heavier on public access computers, such as the Wood Green Library and those on the east side (Marcus Garvey, Coombes Croft and St Ann's).	identified for the consideration of user needs to mitigate the challenges and ensure a successful implementation of self-service technology in libraries. For example offering early morning and late evening unstaffed access for those travelling to and from places of work/education. If combined with a community-run library service, the service will continue to ensure community groups are equipped to take on such responsibilities and ensuring no disparities in service quality.
Ending provision of some hardcopy newspapers in some libraries The proposal is to stop providing hard copy newspapers and magazines in libraries. Newspapers and magazines are now available on Pressreader which provides thousands of newspapers and magazines from around the globe. Many library services that stopped newspapers and magazines during COVID lockdown have not reintroduced them.	Not currently. To be completed at a later date.	**Access to Digital Content** Emphasising online platforms like Pressreader provides library users with access to a broader range of newspapers and magazines from around the globe, therefore increasing the volume of community language periodicals available. This can enhance the variety of	**Digital Divide Concerns** While digital access is becoming more widespread, there may still be segments of the population, particularly older individuals or those with limited access to technology, who may face challenges in transitioning	The library service will work with targeted groups to ensure a clear balance of considerations and ensuring support for users in the transition will be key to the success of the proposal.

		content available to users compared to a limited selection of hardcopy materials with potential benefits for residents who speak English as a second language. .	to digital reading platforms. This could exacerbate existing disparities in access.	The service should consider offering easily accessible devices within the premises to gain access to Pressreader, such as the Hublet.
Wide-ranging ICT contract review to address inefficiencies. Review all contracts controlled by Digital and Change and all ICT contracts held elsewhere in the organisation. We will also review the teams involved in managing and using these applications and consider a hiatus on any new applications.	No	None	None	N/A
Restructure of the Digital and Change directorate. Release savings in the Digital and Change directorate through utilisation of a new operating model.	No	None	None	N/A
Income generation through additional advertising Generate income through increased advertising space in the borough, in line with our ethical advertising policy.	No	None	None	N/A
Culture commissioning budget reduction (contingent on being unsuccessful with London Borough of Culture bid for 2027) Reduction of uncommitted culture commissioning budget, reducing our ability to deliver civic cultural programme (BHH365, Women's History Month, LGBTQ+ History Month, South Asian History Month) Remaining £60k in this budget line would fund Bernie Grant Arts Centre grant at £30k, leaving £30k for basic minimum of events. If our London Borough of Culture 2027 bid succeeds this budget is needed as match funding to lever in c£2-4m external funding from GLA and sponsorship.	Forthcoming Culture Strategy will include an EQIA.	None	Negative impacts are contingent on London Borough of Culture bid being unsuccessful. If this is the case, we will have reduced capacity to support events that celebrate diversity and promote and foster good relations between different protected characteristics with potential impacts on LGBT individuals, Black, Asian and minority ethnic individuals and women.	The council will develop an approach to ensure a minimum of events are held and promoted.

Replace central budget that funds National Graduate Development Programme salaries The central budget in HR that funds NGDP graduates' salaries would be replaced; services would pay for any placements they offer, as these graduates are recognised as a valuable resource. The corporate saving will be delivered over two years as our existing graduates complete their two year placements.	No	None	None	N/A
Improved Commercial Operations Appoint a specialist Head Commercial Operator to identify opportunities and develop a strategy to enhance income generation from our assets	No	None	None	N/A
Increased advertising income Convert static advertising to digital, introduce smaller high street advertising, deliver more large format digital advertising sites, develop SME offer for marketing design & print in line with our ethical advertising policy.	No	None	None	N/A
Community Hubs To implement multi-disciplinary digitally-enabled community hub teams, working alongside the VCS and health partners in locality areas in response to local need. Savings delivered through service efficiencies including reduction in duplication as a result of blended roles and pooled budgets. It will also enable a reduction in or maximisation of the use of council buildings.	To be conducted later	The proposal will include consideration of the specific needs of each localities area, this will allow for targeted actions to improve known inequalities in an area for example a greater focus on low social economic status in the east of the borough. It will also allow for greater scrutiny of existing services equity of access for example do the demographics of residents accessing the service in a locality match the known demographics of the area and if	The localities approach is beginning prior to the completion of the 'bricks and mortar' changes. There are some concerns over the accessibility of buildings and locations for those with physical disabilities and their appropriateness to support residents with neurodiversity or specific conditions such as dementia. We do not anticipate a reduction in service to	Accessibility to be included as an element on the risk assessment used by services and partners to encourage location-specific mitigations

		not are there any changes need to improve this access	people with protected characteristics at this stage but a full EQIA will be completed as the detailed proposal is developed. Any potential negative impacts will be identified through that process and we will seek to mitigate any impacts accordingly	
Capital				
This is to fund ICT in Community Hubs to enable users to access a range of services and experiences	No	Potential positive impacts for disabled people, older people and those digitally excluded and of lower socioeconomic status	None	N/A
This is to fund the ICT element of the proposed Leisure insourcing	No	None	None	N/A
Laptop Replacement	No	None	None	N/A
Libraries Hub ICT (Public Access)	No	Potential positive impacts for disabled people, older people and those digitally excluded and of lower socioeconomic status	None	N/A
CCTV move and replacement of end-of-life infrastructure	No	None	None	N/A
This is investment in a Corporate Data Platform to further inform our interactions with residents	No	Potential indirect benefits from improved council knowledge base and interactions with residents	None	N/A
This investment is required to support Hybrid AV working between now and Civic Centre coming online	No	Potential benefits to those who require remote working facilities including those with disabilities.	None	N/A
This investment is to supplement existing works at Bruce Castle Museum Condition Works	No	None	None	N/A

The investment is to allow the Alexandra Palace Trust to implement measures statutory measures to counter terrorism	No	None	None	N/A
The investment is to undertake health & safety works at Alexandra Palace	No	None	None	N/A
This investment is to fund compliance works at the Alexandra Palace	No	None	None	N/A
This investment is to allow Alexandra Palace to undertake investment to generate additional income. This will take the form of a loan to Alexandra Palace and will be subject to a satisfactory business case	No	None	None	N/A
This investment is to support the replacement of mobile devices that in turn supports mobile working	No	None	None	N/A
This investment is to replace various ICT elements such as desktop AV and Screens in Offices	No	None	None	N/A

Legal and Governance

Proposal	Full EQIA conducted?	Positive Impacts anticipated	Negative Impacts anticipated	Mitigating actions anticipated
Growth				
Increased cost in running of Coroner's court -This proposal reflects the increased costs of running the Coroners Court.	No	None	None	N/A
Recruitment of Principal Scrutiny Officer - The proposal is to fund an additional Principal Scrutiny Officer. This is to reflect an increase in the team's responsibilities.	No	None	None	N/A
Recruitment of legal support posts - The proposal is to fund additional posts to address the mismatch between demand for legal support and the current capacity of the team.	No	None	None	N/A
Recruitment of support for Committees team - The funding will enable support to the Committees team for in-person Cabinet Member signings as well as provide	No	None	None	N/A

extra support for the Scrutiny team for the Joint Health Overview and Scrutiny Committee which our team manages on behalf of five boroughs.				
Increase in establishment and restructure in Property and Planning	No	None	None	N/A

Corporate

Proposal	Full EQIA conducted?	Positive Impacts anticipated	Negative Impacts anticipated	Mitigating actions anticipated
Growth				
Annual Subscription for membership of Central London Forward	No	Membership of the group will help to deliver economic benefits to Haringey with a specific focus on jobs and skills. Positive impacts for residents experiencing labour and skills market disadvantage, including: disabled residents, Black and minority ethnic residents, young people.	None	N/A
Apprenticeship Levy is charged at 0.5% of the annual pay bill. Since it's introduction, the pay bill has increased due to pay award and an increase to the budget is required	No	N/A increase reflects changes to the pay bill	No	N/A
This is the final adjustment required to rebalance the Early Year funding between the DSG and the GF in accordance with the DSG grant conditions.	No	N/A	N/A	N/A
Bank Charges - Impact of Increased Card payments for services	No	N/A	N/A	N/A
External Audit - Impact of increased External Audit Fees	No	N/A	N/A	N/A

Finance

Proposal	Full EQIA conducted?	Positive Impacts anticipated	Negative Impacts anticipated	Mitigating actions anticipated
Growth				
Adjustment to Dedicated Schools Grant - This is a technical budget adjustment between the council's main General Fund (GF) budget and the Dedicated Schools Grant (DSG) budget. This is a requirement to ensure that the Council meets the grant conditions of the Dedicated Schools Grant funding received from central government.	No	None	None	N/A
Savings				
Review entitlement for Council to fund Social Care for adults (proactive fraud exercise)	No	None	None	N/A
Cross check all people housed in temporary accommodation for entitlement (proactive fraud excercise)	No	None	None	N/A
Increase DOF charge to HRA	No	None	None	N/A
Apply charges for non LCP Dynamic Market Places 0.5% - 1% on c£40m of spend. Would include social care related categories. Can only be applied from 2025/26 due to Procurement Act not being in force until October 24	No	None	None	N/A

5. **Consultation**

The budget proposals for 2024/25 have been subject to a formal public consultation. A Budget Consultation Report is appended to the Budget/MTFS Cabinet Report. Key findings

- Respondents were asked which proposals they supported and which they didn't. There was support shown for the need and principle of putting cost saving measures into the budget, moving away from the current leisure centre provider and for funding the Schools Streets programme. There was also support shown by some residents for adjusting library hours rather than have any closures, investing in social housing and new sites for modular

provision and investment in health and social care in the borough. Other proposals which gained some support were the raise in council tax, removal of hard copy magazines in libraries and improving methods of enforcement in the borough.

- There was a lack of support shown by certain residents for amendments to the existing library service, particularly introducing self-service and reducing hours. There was also a lack of support from some for the ongoing refurbishment of the Civic Centre and the council taking leisure services in-house and investing in Pendarren house.
- Respondents were asked what the council should look to do in order to meet its budget challenge and save money, generate income or achieve better value. Suggestions included raising Council Tax, enforcement fees and charges. There were also suggestions to adapt the business model of libraries and start charging for certain services, with a number of respondents recommending a subscription fee. There were suggestions to think again about certain projects which may not benefit the public substantially, use Haringey space for commercial reasons and bring in experts to advise on cost saving practices.

Respondents were asked to comment on any proposals they thought will have a bigger impact on people with protected characteristics.

It was highlighted that leisure and fitness centres and libraries are used by elderly residents not only for fitness and information centres, but also for socialising so they could be negatively impacted if the council are not equipped to bring the facilities in house.

The lack of available toilets if library hours are shortened will also negatively impact older people and potentially pregnant people. Some respondents commented that the proposed budget cuts will disproportionately impact those who are more vulnerable to social isolation and those who are economically disadvantaged.

It was suggested that those with learning difficulties may find it difficult to use an online service to read a paper, or use a self-issue/return machine, the same with people from an older generation.

There were concerns about the budget proposals negatively impacting:

- Older residents
- Disabled residents
- Those with special needs
- Those who are economically disadvantaged
- Children and Young people
- Ethnic minority groups and those for whom English isn't their first language.
- Parents of young children
- Pregnant women

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Haringey Council
Written Statement/Record of a decision made by an officer under delegated authority

Decision Maker (Post Title)	Director of Finance and Section 151 Officer
Subject of the decision	2024-25 Council Tax Base Report
Date of decision	16 January 2024
Decision	I approve the recommendation as set out in the attached report: That, the council tax base for 2024-25 is set at **81,875**in accordance with the Local Authorities (Calculation of Council Tax Base) (England) Regulations 2012; and That the assumed collection rate is set at **97%** for 2024-25.
Reasons for the decision	The Council is required to set its council tax base by the 31st January each year. The Council has delegated the decision for setting the council tax base to the s151 officer in consultation with the cabinet member for Finance. Setting the council tax base is a statutory requirement and a fundamental part of the revenue budget and council tax setting process. It represents a measure of the taxable capacity of the Council and when multiplied by the band D council tax rate indicates the Council's tax generating potential for that year.
Details of any alternative options considered and rejected by the officer when making the decision	No alternatives were considered as this is a requirement of a Statutory Instrument.
<u>Conflicts of interest – Executive decisions</u> **Details of any conflict of interest declared by a Cabinet Member who is consulted by the officer which relates to the decision and details of dispensation granted by the Council's Head of Paid Service**	None
<u>Conflicts of interest – Non executive decisions</u> **Where the decision is taken under an express delegation e.g. by a Committee, the name of any Member who declared a conflict of interest in relation to this matter at the committee meeting,**	N/A

Title of any document(s), including reports, considered by the officer and relevant to the above decision or where only part of the report is relevant to the above decision, that part) **These documents need to be attached to the copy of this record/statement kept by the Authority but must not be published if they contain exempt information**	2024-25 Provisional Local government finance settlement report including the 2024-25 council tax report that sets the referendum principle. **Consultation: provisional local government finance settlement 2024 to 2025 - GOV.UK (www.gov.uk)**
Reasons for exemption with reference to categories of exemption specified overleaf, or **Reason why decision is confidential (see overleaf)** **Note: decisions containing exempt or confidential information falling within the categories specified overleaf are not required to be published.**	N/A
Communicating your decision: **Who needs to know about this decision and is a plan in place to tell them? (officers in your department, in other departments where necessary, members, external stakeholders).**	In accordance with the Council's constitution, the Cabinet Member for Finance has been consulted on the contents of this report.
Signature of Decision Maker	
Name of Decision Maker	Jon Warlow, Director of Finance and Section 151 Officer
Does the decision need to be published? **Yes** √ **No**	

Title: Council Tax base for 2024/25

Report authorised by: Jon Warlow, Director of Finance and Section 151 Officer

Lead Officer: Frances Palopoli, Head of Corporate Financial Strategy & Monitoring

Ward(s) affected: All
Report for Key/

Non-Key Decision: Key decision

1. Describe the issue under consideration

1.1. This report sets out the recommended Council Tax Base for 2024/25. Regulations require the council tax base to be set by 31st January each year.

2. Introduction

2.1. The determination of the council tax base is an important element of the Council's budget setting process. This is because, it is the estimated base that is multiplied by the average council tax amount to derive the amount of council tax precept that the Council will budget for in 2024/25.

2.2. In the previous year, an additional 1% contingency was incorporated into the estimates of for changes to the Council Tax Reduction Scheme (CTRS) claimant numbers in response to the poor economic climate particularly the rising cost of living. As of November 2023, the inflation rate has notably decreased from 9.3% in November 2022 to 4.2%, as reported by the Office for National Statistics. Anticipated interest rate cuts for 2024 further contribute to the improved economic landscape. Due to this more favourable outlook, no growth in CTRS numbers has been included in the CTRS for the current year. This is also supported by the monthly data on claimant numbers which indicate levels are stabilising.

2.3. The forecast for properties awaiting banding has been adjusted slightly upwards, rising from 950 to 1000 for the year 2024/25. This adjustment is supported by internal housing approval monitoring and past completion rates, where an average of around 1,000 new homes has been completed annually over the last three years. This prediction is based on the continuous pipeline supply of housing developments, contributing to the slight increase in the forecasted number of properties awaiting banding for the upcoming year. As c. 79% of properties in the Borough are within Bands A – D, the modelling assumes that any new properties coming into rating through the year will also be within one of these categories.

2.4. A key element of the council tax base calculation is the projected collection rate. The collection rate for 2024/25 has been forecasted to be 97% (96.0% 2023/24) as the Council continues to move back to pre-COVID rates.

As of October 2023, the collection rate is at 62.32%, slightly under the year-to-date target of 64.42%. Despite this variance, achieving the higher collection rate is still deemed realistic due to planned management actions and digital initiatives.

2.5. We expect to see an increase in the Taxbase of 2,158 equating to an increased yield of £3.530m compared to the last financial year. This represents a 1.65% increase in taxbase compared to 2023/24 and is driven predominately by increased properties coming into rating and the 1% assumed improvement in the collection rate.

3. Recommendations

3.1. That:

- the London Borough of Haringey's council tax base is **81,875** for the year 2024/25 in accordance with the Local Authorities (Calculation of Council Tax Base) (England) Regulations 2012, detailed in Statutory Instrument 2012:2914 which came into force on 30th November 2012.

- the assumed collection rate will be **97%** for 2024/25.

4. Reason for Decision

4.1. The Council is required to set its council tax base by the 31st January each year. The Council has delegated the decision for setting the council tax base to the Section 151 Officer in consultation with the Cabinet Member for Finance and Local Investment.

4.2. Setting the council tax base is a statutory requirement and a fundamental part of the revenue budget and council tax setting process. It is the estimate of the taxable capacity of the Council, and when multiplied by the band D council tax rate, determines the Council Tax precept for next year.

5. Alternative options considered

5.1. No alternatives were considered as this is a statutory requirement.

6. Background information

6.1. The Council as Billing Authority is required to calculate the tax base for the Borough in order for it to calculate its own council tax and is also required to notify this figure by 31st January each year to any major precepting authority (the Greater London Authority) as well as the levying bodies (Environment Agency, Lee Valley Regional Park Authority, North London Waste Authority and London Pension Fund Authority) in order for them to calculate and set their own budgets and determine the level of precept / levy to be made to Haringey.

6.2. The calculation of the council tax base is prescribed by regulations. It is the aggregate of estimated number of properties in each valuation band each year, subsequently adjusted to take account of the estimated number of discounts, disregards and exemptions which are likely to apply and any estimated increase / decrease in the list in the forthcoming year. The Council levies council tax on the basis of properties in band D and thus the numbers for each valuation band are adjusted to the proportion which their number is to band D; these proportions are set out in statute. Finally, the

council must estimate its rate of council tax collection for the year and apply this figure to arrive at the council tax base figure.

6.3. The calculation below sets the tax base and not the council tax amount itself which is due to be set on 4th March 2024 at Full Council.

7. Calculation of the Billing Authority's Council Tax base

7.1. The calculation is in two parts; 'A' (the Relevant Amount), which is the calculation of the estimated adjusted band D properties, and 'B', the estimated level of collection.

Relevant Amount

7.2. The calculation of 'A' – the relevant amounts for each band is complex and includes several calculations which are shown in detail in Appendices 1 & 2. The resultant relevant number of properties per band is summarised in the table below:

Band	Relevant Amount (i.e. Number of Dwellings)
A	3,052
B	9,353
C	22,819
D	21,738
E	11,450
F	7,024
G	7,521
H	1,451
TOTAL	**84,408**

***Relevant amounts have been rounded for presentation purposes**

Collection Rate

7.3. The collection rate (B) is the council's estimate of the proportion of the overall council tax collectable for the year that will ultimately be collected. This is expressed as a percentage.

7.4. In arriving at a decision on the collection rate a number of factors need to be taken into account which includes:

- Internal systems and processes involved in the billing and collection process
- Appeals against valuation
- The mobility of the local population, particularly in the private rented sector
- The level and timeliness of information available when properties are sold, or let *and*
- The customer's ability to pay

7.5. For 2024/25 collection rates are forecast at 97%, a 1.0% increase on the 2023/24 rate of 96.0%.

Council Tax Base

7.6. The tax base is calculated by applying the following formula:

A x B = T

Where:

A is the total amount of the relevant amounts for that year
B is the authority's estimate of its collection rate for that year.
T is the calculated tax base for that year

7.7. In accordance with the requirements of the regulations and following the calculations in Appendix 1 to this report and above, the calculation of the Council Tax Base (T) for the London Borough of Haringey in 2024/25 is as follows:

2024/25	
Total Amount of Relevant (A)	84,408
X	
Collection Rate (B)	97%
Council Tax Base (T)	**81,875**

8. Contribution to Strategic Outcomes

8.1. The calculation of the council tax base is prescribed in law. Whilst the council tax base may have some impact on the Council's ability to generate revenue and therefore assist with delivery of corporate goals, the Council needs to adhere to the prescribed technical calculation set out by law in deriving its council tax base.

9. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

Chief Finance Officer's Comments

9.1. The council tax base set out in this report and any projected surplus/deficit on the council tax collection fund as of 31 March 2024 will be used to budget the council tax receivable for 2024/25 that will be included in the final Budget recommended to Full Council on 4th March 2024.

Assistant Director of Corporate Governance's Comments

9.2. The Head of Legal and Governance has been consulted in the preparation of this report, and makes the following comments.

9.3. Pursuant to the Council's Constitution at Part Two – Articles of the Constitution - Article 4, paragraph 4.01(b) the decision on setting the council tax is delegated by Full Council to the s151 officer in consultation with CAB and the Cabinet Member for Finance.

Pursuant to the Local Government Finance Act 1992 (the Act) and the Local Authorities (Calculation of Council Tax Base) (England) Regulations 2012 (the Regulations), the Council is required to calculate its council tax base by the 31st January in calculating the council tax amount due in the following financial year and to also notify all precepting/levying bodies of its council tax base.

9.4. In light of the above, coupled with (1) the assurance given at paragraph 7.7 above that the calculation has been conducted in accordance with the requirements under the Act and the Regulations, and (2) the equality comments below, there is no legal reason why the Director of Finance and Section 151 Officer cannot adopt the Recommendations contained in this report.

9.5. Equality Comments

9.6. The Council has a public sector equality duty under the Equalities Act (2010) to have due regard to:

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

9.7. The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty. Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

9.8. The proposed decision is to Haringey's Council Tax base and the assumed collection rate for 2024/25. The Council as Billing Authority has a statutory duty to calculate the tax base for the borough and notify this figure to the relevant authorities annually on January 31st. Forecast calculations have been modelled using data gathered from previous years and information on new properties in the borough. There are no known equalities implications arising from this decision.

10. Use of Appendices

10.1. Appendix 1 & 2 – Calculation of the estimated adjusted band D properties for the London Borough Haringey 2024/25.

11. Local Government (Access to Information) Act 1985

11.1. None.

APPENDIX 1

Calculation of the Billing Authority's Tax Base

1 Regulation 3 of the Local Authorities (Calculation of Council Tax Base) Regulations 1992 (S.I. 1992 No.612) and amended by (S.I. 2012 No. 2914) states that a Billing Authority's Council Tax Base for a financial year shall be calculated by applying the formula –

'A' x 'B'

Where 'A' is the total of the relevant amounts for each of the Valuation Bands which are shown or likely to be shown in the Authority's Valuation list as at 30 November in the year prior to the year in question, adjusted for estimated discounts, exemptions, disregards, increases / decreases; and where 'B' is the Authority's estimate of its collection rate for that year.

2 The Regulations state that item **'A'** should be calculated by applying the following formula:

((H – Q + E + J) – Z (F / G) where

H is the number of chargeable dwellings in that band

Q is a factor to take account of the discounts of council tax payable. It is calculated as Q = (R x S)

R is the number of discounts estimated to be payable in respect of these dwellings

S is the percentage relating to each discount classification

E is a factor to take account of any premiums to be added to the Council tax base

J is the amount of any adjustment in respect of changes in the number of chargeable dwellings, discounts or premiums calculated by the authority in accordance with paragraph 7 due to factors such as:

(a) New properties and properties being banded

(b) Variations in number of exempt properties

(c) Successful Appeal against bandings

(d) Variations in the number of discounts

Z is the total amount that the authority estimates will be applied in relation to the authority's council tax reduction scheme in relation to the band, expressed as an equivalent number of chargeable dwellings in that band.

F is the relevant prescribed proportion of council tax to be paid for each dwelling in that band.

G is the relevant prescribed proportion of council tax to be paid for Band D

APPENDIX 1

3 Appendix 2 sets out the detailed calculations for **A** for the London Borough of Haringey but the summary is set out below:-

Calculation Item	Disabled Band A	A	B	C	D	E	F	G	H	2024/25 Total
H	2	7,694	19,067	35,266	27,716	11,329	5,448	4,739	736	**111,995**
Q	0	-1,114	-2,627	-3,394	-1,811	-649	-238	-166	-18	**-10,016**
E	0	379	320	288	312	16	15	4	11	**1,345**
J	0	0	0	0	0	0	0	0	0	**0**
(H-Q+E+J)	**2**	**6,959**	**16,760**	**32,160**	**26,217**	**10,697**	**5,226**	**4,578**	**729**	**103,325**
Z	0	-2,381	-4,735	-6,488	-4,479	-1,328	-363	-65	-4	**-19,843**
(H-Q+E+J) - Z	**-1**	**4,578**	**12,025**	**25,672**	**21,738**	**9,368**	**4,863**	**4,512**	**725**	**83,482**
F/G		0.67	0.78	0.89	1.00	1.22	1.44	1.67	2.00	
((H-Q+E+J) - Z) x (F/G)		**3,052**	**9,353**	**22,819**	**21,738**	**11,450**	**7,024**	**7,521**	**1,451**	**84,408**

The table below compares the 2024/25 calculations with those for 2023/24 and highlights where the biggest variances are estimated to occur.

Calculation Item	2023/24 Tax Base	2024/25 Tax Base	Change
H	110,629	111,995	1,366
Q	-9,952	-10,016	-63
E	1,180	1,345	165
(H-Q+E)	**101,857**	**103,325**	**1,468**
Z	-19,708	-19,843	-135
(H-Q+E) - Z	**82,149**	**83,482**	**1,333**
((H-Q+E) - Z) x (F/G)	**83,039**	**84,408**	**1,368**
Collection Rate	96.00%	97.00%	1.00%
Council tax base	**79,718**	**81,875**	**2,158**

Agenda Item 10

Report for: Cabinet – 6 February 2024

Title: School Streets - 2022/23 statutory consultation

Report authorised by: Barry Francis, Director of Environment and Resident Experience

Lead Officer: Tim Walker, School Streets Programme Manager
Joe Baker, Head of Carbon Management

Ward(s) affected: Bruce Castle, Crouch End, Harringay, Hermitage and Gardens, Hornsey, Northumberland Park, Stroud Green

Report for Key/ Non-key decision: Non-key decision

1. Describe the issue under consideration

1.1. Determine whether 8 new School Streets should be implemented in more than two wards. These have all undergone two rounds of consultation with the public, one informal seeking feedback and one formal following due process which allows anyone to make objections.

2. Cabinet Member Introduction

2.1. This report covers our plan to implement School Streets at 8 schools across the borough in order to reduce air pollution, enable active travel to school, and improve road safety for children. Haringey currently has 26 School Streets covering nearly 7km of roads, helping over 11,000 pupils walk, cycle, scoot and wheel to school in cleaner air and with less risk of traffic injury. The need and case for School Streets is clear and compelling. Globally, road traffic crashes are the leading cause of death for children and young people aged 5-29 years old. Over 90% of the world's population live in areas exceeding WHO air quality guidelines, with children especially vulnerable as their lungs are still developing. Most children and adolescents do not meet minimum recommendations for physical activity, which has significant consequences for long-term health.

2.2. School Streets directly address these issues by reducing congestion, air pollution exposure, road danger and encouraging active travel. A recent study in London found that closing roads at drop-off and pick-up times reduced nitrogen dioxide by 23%. Evaluations consistently show increased walking and cycling, with most parents supporting the schemes. School Streets provide children space to arrive and leave school in safety with space to socialise, play and develop independence. They are also simple and inexpensive to implement using barriers or cameras. Scheme after scheme I am always overwhelmed by the number of parents teachers and pupils who can’t believe in the cultural change following implementation. Traffic, stress, bad tempers are replaced with calm and even joy. That’s what the gates outside our schools should be like, right?!

2.3. The growth of School Streets has been exponential in recent years, expanding from just a handful in Northern Italy in the 1990s to over 1,250 globally today. They have spread across Europe, accelerated by COVID-19 responses seeking space for social distancing and active travel. There are now over 500 in London alone. Early pilots in cities like London, Paris and Bogotá have demonstrated the

concept is adaptable, popular and impactful - encouraging widespread replication.

2.4. Haringey's School Streets plans align with the Council's strategic objectives for responding to the climate emergency, improving air quality, enabling sustainable transport and investing in future generations. Implementing these schemes would continue positive progress already made, contributing to a just transition to low-carbon lifestyles. Evaluation of previous Haringey schemes show they have community support and evidence indicates the wider benefits. Approving these School Streets ensures Haringey builds on success to date for cleaner air and safer, healthier streets that put children first.

3. Recommendations

Cabinet is asked to:

3.1. Consider all feedback, including objections to the proposed traffic management orders, as set out in Appendix A together with officer's recommended response set out in Appendix G.

3.2. Agree that the Council shall exercise its discretion to not cause a public inquiry to be held (see paragraph 6.32).

3.3. Approve that the following School Streets projects (as shown in Appendix B) are implemented:

1. Coleridge Primary (Crescent Road) School Street (SS46)
2. Lancasterian Primary School and The Vale Primary School (SS12)
3. Lea Valley Primary, Duke's Aldridge Academy and The Vale Secondary School Street (SS37)
4. North Harringay School Street (SS34 and SS35)
5. South Harringay Primary School Street (SS40 and SS41)
6. St Mary's CofE School Street (SS43)
7. St Mary's Priory RC School Street (SS42)
8. Stroud Green School Street (SS39)

3.4. Authorise the Head of Highways and Parking to make all necessary traffic management orders (TMOs) and install/undertake all necessary highway infrastructure and works necessary to give effect to the School Street design set out in Appendix B of this report.

4. Reasons for decision

4.1. School Streets are a key priority for the Council, as set out within the School Street Plan[1], the Walking and Cycling Action Plan[2] and the Corporate Delivery Plan 2022-2024[3].

4.2. The reasons for recommendation 3.3 are:

- to improve the health of children by increasing active travel, and to reduce road danger and improve air quality near the school gate;

[1] https://www.minutes.haringey.gov.uk/ieIssueDetails.aspx?IId=83410&PlanId=0&Opt=3#AI75755

[2] https://www.haringey.gov.uk/parking-roads-and-travel/roads-and-streets/haringey-streets-people/haringey-s-adopted-walking-and-cycling-action-plan

[3] www.haringey.gov.uk/sites/haringeygovuk/files/final_corporate_delivery_plan.pdf

- the schools are supportive of the plans;
- the proposals contribute towards the strategic objectives of the Council (see Section 7).

4.3. The reason that this is a non-key decision is because, although it discusses the implementation of 8 School Streets which cover more than two wards, it will not result in expenditure of £500,000 or more. It also will not be significant in terms of its effects on communities living or working in an area covering two or more wards or electoral divisions in the area of the local authority, hence is unlikely to result in substantial public interest or social, economic or environmental risk.

5. Alternative options considered

Do nothing

5.1. This option was rejected as not delivering School Streets would not meet the objectives set out in the Corporate Delivery Plan, the Transport Strategy, the Climate Change Action Plan, the Walking and Cycling Action Plan and the School Street Plan.

6. Background information

6.1. School Streets transform roads to create a better environment for children to walk, cycle and wheel (this covers those using a scooter or a wheelchair) to school, leading to improved health outcomes.

6.2. When a School Street is in operation, the road temporarily becomes a pedestrian and cycle zone at school drop-off and pick-up times.

6.3. By temporarily closing the road to motor vehicles at the start and end of the school day, School Streets help:

- Reduce traffic outside a school, which reduces emissions and makes the air around the school cleaner at peak times for children.
- Make it safer to walk, cycle, scoot, and wheel to school. Children will benefit from increased physical activity on their journey to and from school.
- Reduce traffic congestion and parking problems outside a school and thereby reducing road danger

6.4. Local residents and businesses can apply for exemptions giving them the ability to drive into the School Street if needed. Emergency service vehicles have access at all times.

6.5. There are over 500 School Streets in London, with 26 in Haringey. Nealy 7km of Haringey's streets have already been converted to pedestrian and cycle zones at school-run times. This is helping our children to walk, cycle and wheel to school more safely – and in cleaner air - than before.

School Street Plan

6.6. In June 2023, the Council approved a new School Street Plan[4] ('the Plan') which sets out a standard framework to deliver Haringey's School Streets programme, allowing for consistent, successful and efficient delivery of these measures.

6.7. The Council has introduced 26 School Streets and a further 14 are currently in design, consultation or decision-making stages. The Plan identifies the schools listed in this report for a School Street, subject to the outcome of consultation and decision making.

Objectives of a School Street

6.8. The key objectives of a School Street are as follows:

- Objective 1: Reduce congestion and car use near schools
- Objective 2: Reduce road danger and improve safety for pupils and parents/carers travelling to and from school
- Objective 3: Encourage active travel to schools
- Objective 4: Improve air quality around schools

6.9. Monitoring of recent experimental School Streets in Haringey[5], as well as research carried out by other boroughs and Transport for London[6], show that these objectives are consistently met.

6.10. The Mayor of London's Transport Strategy (MTS) included the following targets:

- *"Mode share - 88 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041 (77% in 2019)*
- *Physical activity - all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day by 2041 (currently 32%)"*

Haringey Council adopted these targets through the Haringey Local Implementation Plan and the Walking and Cycling Action Plan (WCAP) (2022). School Streets help to deliver these targets as they create a positive environment that encourages increased levels of walking, cycling, public transport and physical exercise.

Locations

6.11. This report considers proposals for School Streets at the following locations:

ID	Project / school name(s)	Ward	Streets (wholly or partially) impacted by proposed School Street
SS46	Coleridge Primary School (Crescent Road)	Crouch End	Crescent Road
SS12	Lancasterian Primary School and The Vale Primary School	Bruce Castle	Bruce Castle Road, Birkbeck Road, King's Road, King Street, Church Road, New Road, Tebworth Road, Nursery Street
SS37	Lea Valley Primary, Duke's Aldridge Academy and The Vale Secondary School	Northumberland Park	Trulock Road, Commonwealth Road, Almond Road, Farningham Road, Somerford Grove

[4] https://www.minutes.haringey.gov.uk/ieIssueDetails.aspx?IId=83410&PlanId=0&Opt=3#AI75755
[5] https://www.minutes.haringey.gov.uk/ieIssueDetails.aspx?IId=78374&Opt=3
[6] https://content.tfl.gov.uk/getting-to-know-school-streets-case-studies-2022.pdf

ID	Project / school name(s)	Ward	Streets (wholly or partially) impacted by proposed School Street
SS34 & SS35	North Harringay Primary School	Harringay	Falkland Road, Frobisher Road
SS40 & SS41	South Harringay Primary School	Harringay	Mattison Road, Pemberton Road
SS43	St Mary's CofE Primary School	Hornsey	Rectory Gardens
SS42	St Mary's Priory RC Infant and Junior School	Hermitage and Gardens	Hermitage Road
SS39	Stroud Green Primary School	Stroud Green	Woodstock Road, Ennis Road, Perth Road, Florence Road, Oxford Road

Proposals

6.12. The key elements incorporated within each School Street proposal are:

- A time-limited School Street (Pedestrian and Cycle Zone) that will operate:
  - Term time only
  - Monday to Friday
  - For approximately 30 minutes before the school gates open until 15 minutes after they close, in the morning and afternoon
- Motor vehicles (cars, vans, motorcycles etc.) are not allowed to enter the School Street unless they had been issued an exemption (details below).
- Traffic signs will be installed to inform motorists of the restriction. The signs would be closed (and covered up) when the School Street is not in operation during the three main school holidays. Updates of the new restriction and times of operation will be sent to sat-nav companies.
- Motor vehicles entering a School Street without an exemption, during operational hours, are committing a moving traffic contravention and can be identified by CCTV camera and issued a penalty charge notice (PCN).
- Vehicles can drive out of a School Street at any time. An exemption is only required to drive into a School Street during operational hours.
- School Streets remain open to people walking, cycling and wheeling
- Emergency services will always have unhindered access.

6.13. In line with the exemption policy set out in paragraphs 6.44 to 6.59 of the School Streets Plan (summarised in Appendix C to this report), the following parties would be eligible to apply for a motor vehicle exemption:

- Residents who live within the School Street (maximum of 2 vehicles per property).
- Businesses with premises within the School Street (maximum of 2 vehicles per property).
- Blue Badge (disabled) holders or those with a medical condition that require access to the street during the restricted hours.
- School buses and vehicles used in the transport of children or adults with special access requirements.

- Medical practitioners attending patients with an address within the School Street.
- School staff (to a maximum of 10% of the total number of staff at that school). In addition, any staff who are Blue Badge holders may apply for an exemption when the school has provided parking for those holders.

6.14. In addition to the above, exemptions are automatically provided for:

- Emergency services
- Statutory undertakers, if access to the School Street is necessary
- The local authority, in pursuance of its statutory powers, if access to the School Street is necessary
- Exemptions stated in the Highway Code, such as a medical emergency or with the permission or at the direction of a police officer.

6.15. As noted in paragraph 6.12, the proposed School Streets allow motor vehicles to proceed within and exit from the School Street during operational times. Thus, the associated traffic management order does not impose a prohibition upon loading or unloading within the School Street.

6.16. The Council has previously introduced 22 School Streets on a trial basis, during which time thorough monitoring and evaluation processes have taken place. As noted in paragraph 6.22 of the School Street Plan (June 2023), the results of School Street trials completed until that date have seen:

- Motor vehicle traffic volumes reduced by 42% on average.
- Nitrogen oxide (NOx) levels reduced by 26% on average.
- Walking and cycling to school increased by 3.7% during the trials and trips to school by car fell by 4% on average.
- Compliance of the restriction increased over time. By the end of the trials, the number of penalty charge notices (PCNs, sent out per month) had fallen by 55% and less than six PCNs were issued per camera per day on average.
- High levels of support from parents and carers. 75% supported making them permanent on average.
- Unanimous support from headteachers. At the end of the trials and full conclusion of formal review, 100% of headteachers (or nominated member of staff) considered them a success and supported making them permanent. They reported calmer, more pleasant and safer feeling streets.

Consultation and engagement process

6.17. The consultation and decision-making process, to-date, is summarised as:

- Summer / autumn 2022 – engagement between school staff and Council officers leading to initial designs suitable for informal consultation.
- November 2022 to January 2023 – informal consultation with all properties in vicinity of proposals, pop-up stalls outside schools and key stakeholder consultation (statutory bodies, transport groups and groups representing those with protected characteristics).

- October to November 2023 – reconsultation on revised design for SS12 Lancasterian and The Vale School Street (TMO consultation and letter drop with questionnaire hand delivered to all properties within ~150m of the proposed School Street)
- November 2023 – decision[7] by the Director of Environment and Resident Experience following consultation with the Cabinet Member for Climate Action, Environment and Transport to proceed to statutory (traffic management order/TMO) consultation on seven School Streets[8]
- November to December 2023 – statutory (TMO) consultation, including street and press notices, letter drop to all properties in the vicinity and stakeholder consultation (statutory bodies, transport groups and groups representing those with protected characteristics).

Informal consultation and changes made in response to feedback

6.18. Informal consultation was carried out during November 2022 to January 2023.

6.19. Having taken into consideration all feedback received, a decision[9] was taken on 14 November 2023 by the Director of Environment and Resident Experience to progress seven School Streets to the statutory (TMO) consultation stage.

6.20. In the case of Lancasterian and The Vale (SS12), the results of the informal consultation identified that substantial changes were required to the design. As such, a further combined (informal and TMO) consultation was carried out. The results of which are discussed in the following section.

Reconsultation of SS12 Lancasterian and The Vale Primary School Street

6.21. During October and November 2023, a revised design was consulted upon with a larger area. The consultation was a statutory (TMO) consultation and letter drop and questionnaire hand delivered to all properties within ~150m of the proposed School Street.

6.22. The revised design took account of feedback received during the earlier stage of informal consultation, from the public and ward members, that the School Street was not large enough.

6.23. Objections made in response to the proposed TMOs for SS12 are discussed in the following section.

Statutory (TMO) consultation

6.24. In accordance with The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996, referred to as LATOR, the authority must carry out certain procedures before making a traffic management order. This includes consultation of specified consultees, publishing a notice of proposal and any other steps it considers appropriate.

[7] https://www.minutes.haringey.gov.uk/ieDecisionDetails.aspx?id=2966&LLL=0
[8] Lancasterian and The Vale School Street (SS12) was excluded from this decision as it was agreed that further consultation was required, which has now been completed and is discussed in this report
[9] https://www.minutes.haringey.gov.uk/ieDecisionDetails.aspx?id=2966&LLL=0

6.25. The proposed traffic management orders were consulted upon as follows:

- SS12 – 25 October to 24 November 2023
- All other School Streets – 22 November to 13 December 2023

6.26. Publicity was carried out as follows:

- Notice of proposals (Appendix D) in:
  - London Gazette
  - Enfield and Haringey Independent
- Notice of proposal affixed to lamp columns
- Letter drop hand delivered to all properties within ~150m of the proposed School Street (letter and distribution map in Appendix E):
- Stakeholder consultation (list of stakeholders in Appendix F)
- Ward members informed
- Social media
- School Street webpages – downloads of all documents available

6.27. Response to the consultation could be made by either:

- Making a formal objection to the proposed traffic orders (online, email or by post)
- Providing comments via a (freepost) feedback card. This card also allowed respondents to 'tick' if they wanted their comments to be considered as an objection to the traffic order.

6.28. Responses to the statutory consultation are detailed in Appendix A and summarised in the following table.

	Support or Object					
	Support		Object		Other view	
	Count	Row %	Count	Row %	Count	Row %
Coleridge Primary SS46	16	59%	8	30%	3	11%
St Mary's C of E SS43	9	41%	12	55%	1	5%
Lea Valley, Dukes Aldridge, the Vale SS37	6	46%	5	38%	2	15%
North Harringay Primary SS34 & 35	66	72%	24	26%	2	2%
South Harringay Primary SS40 & 41	108	78%	25	18%	5	4%
Stroud Green SS39	40	51%	30	38%	9	11%
St Mary's Priory SS42	38	51%	37	49%	0	0%
Lancasterian SS12	53	45%	54	46%	11	9%
Total	336	60%	195	35%	33	6%

6.29. No objections, to any of the School Streets, were made by any key stakeholder, but objections were received from residents and other members of the public.

6.30. Officers have considered all feedback received and grouped them into themes in Appendix G, this appendix also includes officers recommended response to any objections.

6.31. In response to feedback and objections the following design changes are considered appropriate and have been included within the plans recommended for approval, as set out in Appendix B

- SS34/35 – extend exemption eligibility boundary to include Ground Floor Flat 258 Wightman Road as the property has direct access into the School Street via the rear.

6.32. It is noted that LATOR provides local authorities with the discretion of whether or not to hold a public inquiry prior to the making of a TMO. This report does not include the recommendation to hold a public inquiry on account of: the effect of the order (see paragraphs 6.15), the relatively small number of objections, the wider support for the project, that the project will contribute towards achieving a number of policy objectives and that holding a public inquiry would lead to expense and delay while being unlikely to alter the ultimate decision.

Memorandum of Understanding

6.33. Before any School Street is fully implemented, a Memorandum of Understanding (MoU) will be signed by the Council and the school. This is in progress for all those schools recommended for implementation within this report.

6.34. The MoU sets out what each party is expected to do in the arrangement. It includes tasks for the Council such as making traffic management orders, installing traffic signs and providing supporting material and matters for the school such as educating pupils, staff and parents/carers about the scheme, compiling a School Travel Plan and committing to TfL's 'Travel for Live' active travel programme, previously known as 'STARS'.

Project costs

6.35. £553,000 has already been spent (or committed) to date to progress the proposals to consultation, undertake engagement with schools, capture traffic volumes and arrange surveys and purchase of CCTV for the School Streets programme. This report is recommending 8 School Streets being delivered and the cost to do this is £152,000.

6.36. The estimated remaining costs (£152,000) will be fully met from the Council's capital programme under Scheme 119 – School Streets.

6.37. Aspects covered by the total costs include active travel engagement with the school and community, highways signage and notifications, independent road safety audits, traffic counts, cameras and set up, letter drops and communications to the school and community.

6.38. These costs and measures are required to enable the delivery of each project. These costs will be managed within the Capital Programme (School Streets) for the Council.

7. Contribution to the Corporate Delivery Plan 2022-2024 high-level strategic outcomes

7.1. School Streets are specifically identified within the "Responding to the Climate Emergency" theme of the Corporate Delivery Plan, under High Level Outcome 2 - "A Just Transition." This outcome relates to ensuring the transition to a low

carbon economy is just, equitable and benefits everyone by improving air quality and road safety around schools. This will be achieved through a number of activities including:

- School Streets – create 30 School Streets by 2024 (approximately 15 per year) to improve air quality and road safety around schools.

7.2. School Streets also contribute to other high-level outcomes contained within the "Responding to the Climate Emergency" theme:

- High Level Outcome 1 "A Greener and Climate Resilient Haringey"
- High Level Outcome 3 "A Low Carbon Place"

7.3. School Streets contribute further to high-level outcomes contained within the "Placemaking and Economy Theme" within High Level Outcome 5 "Placemaking." Specific areas of social and economic renewal will benefit from air quality improvements resulting from the delivery of School Streets in:

- Wood Green
- Bruce Grove
- Seven Sisters

8. Carbon and Climate Change

8.1. School Streets contribute positively to carbon emission reduction and mitigate climate change in the following six ways:

8.2. Reduced vehicle emissions: Vehicle emissions are reduced within School Streets during drop-off and pick-up times. When motorised traffic is restricted, there is a reduction in tailpipe emissions of carbon dioxide (CO2), nitrogen oxides (NOx), and particulate matter (PM). Fewer emissions mean a direct decrease in the carbon footprint associated with school-related travel.

8.3. Promoting active travel: By making the area around schools more pedestrian and cyclist-friendly, School Streets encourage active transportation modes such as walking and cycling. This not only reduces greenhouse gas emissions but also promotes a healthier lifestyle, which, in the long run, can reduce healthcare-related emissions linked to sedentary lifestyles.

8.4. Behaviour change: School Streets can also lead to behaviour change among parents and guardians. When motorised access to school is limited, parents may opt for alternative transportation methods, further reducing the number of vehicles on the road and associated emissions. Over time, this can lead to a shift in commuting habits with lasting environmental benefits.

8.5. Public awareness: Implementing School Streets raises awareness about the environmental impact of transportation choices. It provides an opportunity for schools to engage students in discussions about sustainability, climate change, and the importance of reducing carbon emissions. This heightened awareness can influence future generations to make eco-conscious decisions about transport.

8.6. Long-term effects: While School Streets primarily target short-term reductions in emissions during school hours, their influence can extend beyond these times. Positive experiences with active transportation and reduced reliance on private

vehicles can lead to long-term changes in commuting behaviour, resulting in sustained emissions reductions.

8.7. Synergy with Climate Change Action Plan: School Streets align with the goals set out within the Climate Change Action Plan by directly contributing to reduced carbon emissions within the community and contribute to the achievement of emissions reduction targets.

9. Transport policy objectives

9.1. School Streets help deliver policies and targets set within the Mayor of London's Transport Strategy (MTS). These policies and targets have since been adopted by Haringey through the Haringey Local Implementation Plan and Walking and Cycling Action Plan (2022):

- The MTS uses the Healthy Streets Approach to improve air quality, reduce congestion and help make London's diverse communities greener, healthier and more attractive places to live, work, play and do business.
- Mode share - 88 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041 (77% in 2019)
- Physical activity - all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day by 2041 (currently 32%)

9.2. The Council has a duty under section 122 of the Road Traffic Regulation Act (RTRA) 1984 to (in summary) *"secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway having regard to securing and maintaining access to premises, preserving or improving the amenities of the areas through which school street runs, national air quality, facilitating the passage of public service vehicles and safety and convenience of people using such vehicles as far as practicable."* Officers consider that the following are of particular relevance, given the objectives of the School Street:

- School Streets provide access at all times to pedestrians and cyclists. Reasonable access is maintained to vehicular traffic by way of a range of exemptions when the School Street is in operation.
- School Streets restrict the passage of heavy commercial vehicles and so, in turn, preserve or improve the amenities of the area affected.
- Evidence from other School Street projects[10] demonstrates that they improve air quality in the vicinity of schools. It is expected that this will also be the case in relation to this project. Therefore, the proposal has due regard to the national air quality strategy, prepared under section 80 of the Environment Act 1995.
- The School Street proposal does not restrict the passage of public service vehicles.
- The project aims to address the risk of road danger by reducing the volume of traffic close to school gates. Not only do School Streets dissipate traffic over a larger area (as opposed to a concentration of traffic within a smaller section of road space outside the school entrance) but they also encourage

[10] https://www.london.gov.uk/press-releases/mayoral/school-streets-improve-air-quality

modal shift (i.e. change school-run trips from car travel to active travel) and so reduce the overall volume of traffic on the road network, in turn, reducing the risk of road danger.

10. Statutory Officer Comments

Finance

10.1. This report seeks the approval for the points highlighted in section three of this report, particularly the delivery of eight School Streets projects (as shown in Appendix B) for a total cost of £152k.

The cost associated with the recommendations will be fully met from the current councils capital programme, under capital scheme number 119 – School Streets.

Legal

10.2. The Council's power to make an order regulating or controlling vehicular and other traffic is contained within section 6(1) of the Road Traffic Regulation Act 1984 (RTRA).

10.3. A consultation on the restrictions on the movement of traffic in the TMOs for the School Streets has been undertaken as required under the RTRA and LATOR as described in paragraphs 6.23 to 6.25 of this report and the objections and responses received from stakeholders and members of the public set out in Appendix A together with officer's recommended response set out in Appendix G, which must be taken into account before the decision whether to make the TMOs is taken.

10.4. The Courts have held that a decision maker must consider consultation responses with 'a receptive mind' and be prepared to change course if persuaded by a response but is not under a duty to adopt the views of consultees.

10.5. Regulation 9(1) of LATOR sets out when an authority must hold a public inquiry before making an order and when it has a discretion to hold one. Given that there is no restriction on loading or unloading in the TMOs for the School Streets, there is a discretion but no obligation to hold an inquiry. Having considered the objections to the proposal, it would be lawful for the Council to decide not to hold a public inquiry for the reasons explained in paragraph 6.32 of this report.

10.6. As required under section 122 of the RTRA, the factors which point in favour of making the restrictions on the movement of traffic in the TMOs for the School Street are set out in paragraph 9.2 of this report.

10.7. Approving the making of the TMOs for the School Street is an executive decision that can be taken by the Cabinet in accordance with the Council's Constitution.

Equality

10.4. The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

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

10.5. The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

10.6. Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic

10.7. The first School Street Plan (2020) was subject to an Equalities Impact Assessment (EqIA) which was updated in 2022 and again as part of the new School Street Plan (2023). The current EqIA should be read in full (see Appendix H). Officers are satisfied that the information contained in the EqIA contained with ths School Street Plan 2023 remain relevant.

10.8. The current EqIA identifies that:

- There is evidence that air pollution disproportionately affects children and young people. Therefore, the recommendations represent a step change to address a known inequality.
- The primary beneficiaries of the School Street programme will be young people, with older people, those with disabilities, and pregnant women also benefitting from improved air quality.
- Young people, older people, those with disabilities and pregnant women will benefit because they disproportionally suffer from poor air quality.
- Those people with a disability, who hold a blue badge and require access to a property within the School Street will be eligible for an exemption.
- It also notes that the Council will take steps to identify and prevent or mitigate any adverse impacts that may be identified (during later design stages of each project) for people who depend on car travel, such as people with limited mobility, pregnant women, and people who depend on private vehicles to attend places of worship.

10.9. The recommendations contained within this report are considered to be consistent with the EqIA detailed above.

10.10. It is noted that the exemptions available for School Streets are different than the exemptions available for Low Traffic Neighbourhoods (LTNs). This is because the two project types have different objectives. Exemptions to School Streets are typically more limited than exemptions for LTNs because the primary objective of School Streets is to create a safer environment for children (a particularly vulnerable protected group), while LTNs aim to reduce the overall impact of traffic in residential areas. For example, exemptions within LTNs allow vehicles to pass through a traffic filter even if the journey could be taken via another route. However, in School Streets, this is not the case and exemptions are only provided where motorists have a requirement to access premises within the School Street. It is also important to note that School Streets only operate for a very limited time

period (approximately one hour in the morning and one hour in the afternoon), Monday to Friday and during term time only. This contrasts to traffic filters within LTNs which operate 'at any time'. This difference is relevant when considering the justification and proportionality of the School Street under the Equality Act.

10.11. Mitigation is made through the implementation of an exemption permit system whereby certain groups can apply for an exemption to the restriction, where they meet the specified policy criteria. The groups currently provided for are set out in paragraphs 6.13 and 6.14. Those holding a valid exemption are allowed to drive into the School Street during operational times.

10.12. Consultation was carried out during the initial design stage. This has provided everyone with the opportunity to comment prior to it becoming permanent.

10.13. It is noted in the report that groups representing those with protected characteristics were consulted and no objections were received.

Strategic Procurement

10.14. Strategic Procurement has been consulted in the preparation of this report.

10.15. Strategic Procurement notes the contents of the report and recommendations in section 3 which do not necessitate a procurement process or decision.

10.16. Strategic Procurement has no objections to the recommendations in section 3 of this report.

11. Use of Appendices

Appendix A – Consultation and feedback report
Appendix B – Final designs
Appendix C – Exemption policy
Appendix D – Proposed traffic order notices
Appendix E – Letterdrop and distribution map
Appendix F – Stakeholder list
Appendix G – Objection themes and officer's recommended response
Appendix H – Equalities Impact Assessment

12. Background Papers

- 13/6/23 - Cabinet: School Street Plan
- Haringey's Corporate Delivery Plan
- Haringey's adopted Walking and Cycling Action Plan
- 7/3/2022 - Cabinet Member signing: Review of 10 School Streets (Batch 1a and 1b)
- 14/11/2023 - Director of Environment and Resident Experience:2022/2023 School Streets

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School Streets batch analysis. 10 January 2024

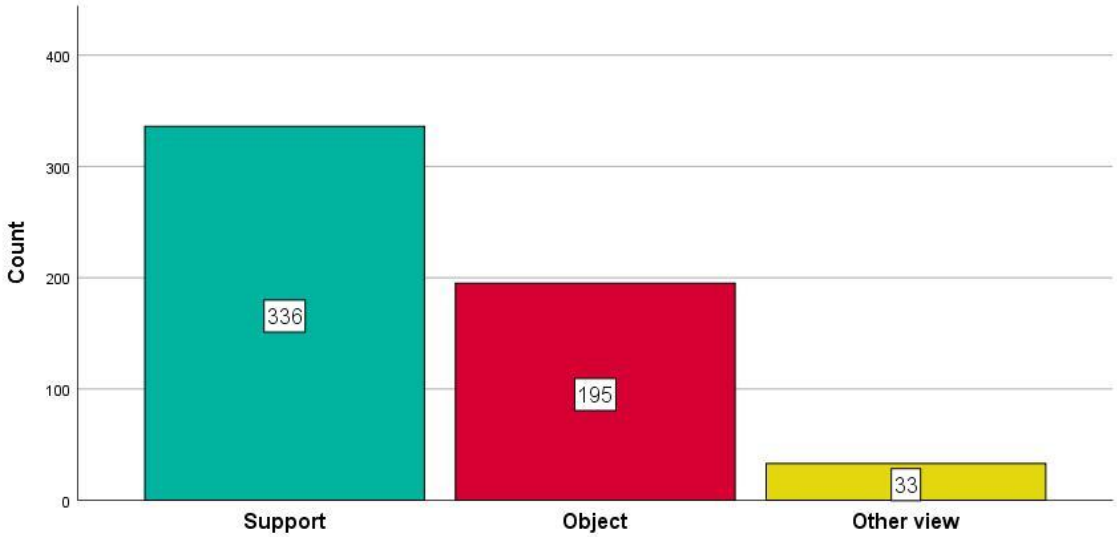
Statutory Consultation Feedback

As of 5 January 2024, 564 responses have been received.

DATA ANALYSIS

1. Overview of support and objections

Table 1



		Count	%
Support or Object	Support	336	60%
	Object	195	35%
	Other view	33	6%
	Total	564	100%

2. Summary of Reasons given for Objections

Table 2

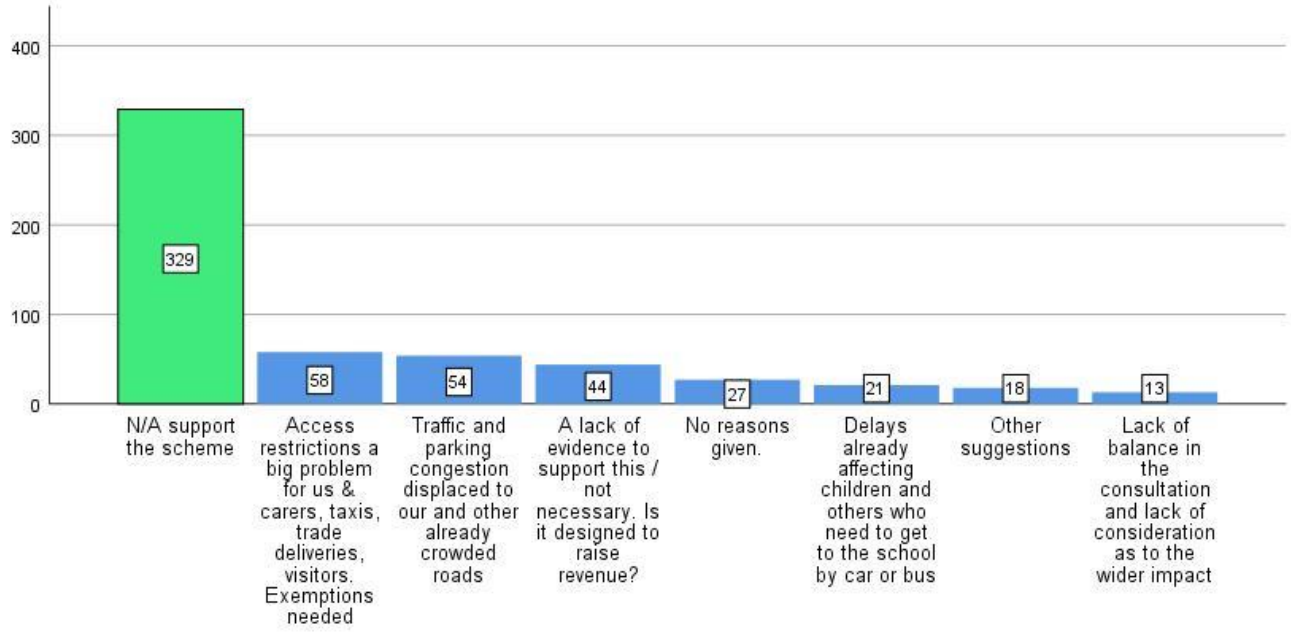


Table 3

	Count	%
N/A support the scheme	329	58%
Access restrictions a big problem for us & carers, taxis, trade deliveries, visitors. Exemptions needed	58	10%
Traffic and parking congestion displaced to our and other already crowded roads	54	10%
A lack of evidence to support this / not necessary. Is it designed to raise revenue?	44	8%
No reasons given.	27	5%
Delays already affecting children and others who need to get to the school by car or bus	21	4%
Other suggestions	18	3%
Lack of balance in the consultation and lack of consideration as to the wider impact	13	2%
Total	564	100%

Many of the objectors recognise the desirability of having safe roads for children coming in to the school, but there is considerable concern about the difficulty faced by residents driving in and out of their roads (especially in the ladder area) in part because driving in and out will take much longer because of the limited alternative routes, which are expected to become much more congested.

Businesses (9 in the SS zones) are also very concerned about loss of trade.

There is also significant concern amongst residents who are elderly or disabled and who need access for their family / carers / deliveries etc. Many of these and other residents living in or next to the school streets are requesting some exemption arrangements to deal with their concerns.

The developent of LTNs and the associated negative publicity have affected some perceptions of the school streets, but in general, the positive aspects of school streets are widely recognised.

3. Support by individual School Street

Table 4

	Support or Object					
	Support		Object		Other view	
	Count	Row %	Count	Row %	Count	Row %
Coleridge Primary SS46	16	59%	8	30%	3	11%
St Mary's C of E SS43	9	41%	12	55%	1	5%
Lea Valley, Dukes Aldridge, the Vale SS37	6	46%	5	38%	2	15%
North Harringay Primary SS34 & 35	66	72%	24	26%	2	2%
South Harringay Primary SS40 & 41	108	78%	25	18%	5	4%
Stroud Green SS39	40	51%	30	38%	9	11%
St Mary's Priory SS42	38	51%	37	49%	0	0%
Lancasterian SS12	53	45%	54	46%	11	9%
Total	336	60%	195	35%	33	6%

- There is very strong support for: North Harringey and South Harringay and there is significant majority support for Coleridge Primary, and Stroud Green.

- There are mixed views for St Mary's Priorym St Mary's C of E, and Lancasterian school streets.

Comments and suggestions – grouped by School Street

[Personal information such as addresses and names have ben removed from this listing]

Comments are generally constructive, and the main concerns relate to access for services and deliveries; and requests for more information on facilities for elderly and vulnerable residents needing deliveries, taxis and visits. Comments also include a range of informed suggestions.

Name of School Street.	Support or Object	Any suggestions or recommendations
Coleridge Primary SS46	Support	Dear Anne Cunningham As a fairly new resident in Crescent Road, I have been meaning to write to Lester Buxton for a while to ask about what traffic calming measures are being put in place for our road. So I was pleased to see the public notice re the proposed school street. In my opinion our road is an accident spot waiting to happen. Blame Waze or whatever but Avenue and Crescent road has become a cut through from the Archway road and traffic speeds down it irrespective of the poorly marked speed restrictions. While I am pleased to see the proposal to create a School Street Zone in the area around the entrance to Coleridge Primary school, I don't think this is enough to avoid the inevitable outside of the restricted hours. As you know the road curves, causing a blind corner, added to the fact that cars park on both sides of the street making passing very difficult, especially at speed. Daily we see drivers losing their temper as they are forced to reverse to allow an oncoming car to pass. We live in Standard Apartments no xxd and sleep on the front, cars speed down the roads day and night and would like to know if there is a bigger plan to help with this ? ie installing Cameras, speed humps or creating more passing places.
Coleridge Primary SS46	Support	
Coleridge Primary SS46	Support	
Coleridge Primary SS46	Support	1. Put more benches on the triangular green to make it more user-friendly! 2. "Put up a sign saying: "No dogs exercised on Green"
Coleridge Primary SS46	Support	Adjacent and nearby streets need to be monitored for congestion, as people go there instead for drop-offs. This is currently happening in Crescent Rd.
Coleridge Primary SS46	Support	Excellent initiative. Maybe also encourage more bicycle lock-ups
Coleridge Primary SS46	Support	I fully support this scheme across all schools everywhere. Excellent initiative! Thank you.
Coleridge Primary SS46	Support	I recommend stopping all parking between the school and Parkland Walk in order to convert this into a pedestrian zone with planters etc. It is just a car park at the moment with fly tipping as well. Let's make it a green space. Regards.
Coleridge Primary SS46	Support	In addition to enforcement cameras, I would strongly urge for speed humps to be put i in on Crescent / Avenue roads, as traffic often speeds past Williams Close and I'm worried about all the children who cross the road here. I have seen many near-misses, and fear there will be fatal accident. Speed humps please!

Coleridge Primary SS46	Support	It's very important, in my view, to implement this scheme. Congestion and engine idling have reached ridiculous levels at school drop-off and pick-up times. Sadly, drivers are often verbally abusive as well if they block your driveway and you ask them to move.
Coleridge Primary SS46	Support	May the 'green' be planted with new trees and measures to slow cars on Avenue and Crescent roads, as these are used as rat-runs.
Coleridge Primary SS46	Support	More School Streets
Coleridge Primary SS46	Support	The school needs more DYL around the entrances of the school, as people park too close them, blocking the entrance for deliveries etc.
Coleridge Primary SS46	Support	We are concerned at the congestion the scheme will cause along Avenue Rd., the rest of Crescent Rd., and Coolhurst Road; and we believe that some sort of one-way system should concurrently be introduced to counter the knock-on effect of displaced and extra parking congestion created in the surrounding roads.
Coleridge Primary SS46	Support	Will there be monitoring - of the e-bikes and mopeds which cut through Crescent Rd from Crouch End Hill - as well please? Some delivery bikes such as Uber eats and Deliveroo are fine, but some of the e-bikes are inconsiderate.
Coleridge Primary SS46	Support	Would it be possible to pave the road at the same time? Avenue Rd was done earlier this year and the pedestrian walkways were in better condition than Crescent Rd.
Coleridge Primary SS46	Object	
Coleridge Primary SS46	Object	I object because I won't be able to park my car outside my property during SS hours. Most, if not all Coleridge children live locally and walk to the school. It makes the SS pointless. Some residents in my block are disabled and require to be dropped off at home by carers. The SS proposal restricts carer and other access and is unfair to residents who need services etc.
Coleridge Primary SS46	Object	In a school with 800, very few cars ever seen.
Coleridge Primary SS46	Object	The elderly lose out again. These schemes prevent carers and family coming in to look after elders and elderly relatives.
Coleridge Primary SS46	Object	This scheme is not worth the fuss and expense. Being a dead end, there is already minimal traffic and is pretty safe to walk in the road even at drop off and collection times.
Coleridge Primary SS46	Object	This will increase traffic congestion and pollution by concentrating cars in one spot. Crescent Rd already has bollards. It would be better to put in road humps and traffic calming devices on all of Crescent Rd and Avenue Rd for the safety of children and residents.
Coleridge Primary SS46	Object	Timing is incorrect. They should be 0830-0900 and 1500-1530 to be of any use. More importantly, if you are 4 - 8 Avenue Rd. and your car is facing the wrong way, you will struggle to turn the car around and might even hit a pedestrian or child; so the design is less safe than the current arrangement. Also it will make it very busy outside Avenue Rd again - making traffic more dangerous at the junction
Coleridge Primary SS46	Object	Totally unnecessary. Most parents walk children to school. Many have had to move out of the catchment because it's too expensive, and have no choice but to drive in. My disabled mother gets distressed worrying about whether the UBER / Taxi and / or family can pick her up or drop her off at home. School staff can't afford to live near the school or drive, and traffic is now bad on the bus routes as well. now. BTW the main pollution comes from Crouch Hill, NOT Crescent Rd.!

Coleridge Primary SS46	Other view	I submitted feedback on the website but it did not confirm it went through so I am emailing as well. This school street has already been proposed by post and I would assume was rejected due to feedback regarding traffic. That has not changed there are frequent long queues of backed up traffic on Crescent and Avenue Road already without the extra school traffic offloaded onto this road. Not only that but the sign is highly ambiguous and is posted on the section of road that is referenced on it, between the junction of avenue Road and Crouch End hill. This is not the proposed section of road though. As the proposed section does not have a junction to Crouch End hill it just ends there. So surely this public notice cannot be used anyway? There is not a single notice on the section of road that is being considered at all.
Coleridge Primary SS46	Other view	I'm generally supportive of school streets and measures to protect children's safety. However, the road which is the subject of this proposal is a no-through-road, so has no through traffic. Therefore this measure seems unnecessary and a waste of public funds.
Coleridge Primary SS46	Other view	Hello, I work for the Teachers H.A. and I'm constantly going in and out of the property doing maintenance work for tenants in Haringey. I don't live there but I use my vehicle from Crescent Rd. Can I get an exemption?
St Mary's C of E SS43	Support	Fully support
St Mary's C of E SS43	Support	Hello, I live at xx Nightingale lane N8 and would like to lodge my request to make the whole of our road a school street as well as Eastfield road. Our road is incredibly busy as it's a cut through road and serves many of the roads around us as well as the estate. There is a primary school at the end of our road, so with the huge amount of traffic that we already have there are hundreds of children walking up and down it every day. With the proposed making of rectory road gardens a school street, this will make our already incredibly busy street, busier. With more motor vehicles pushed onto our road as they can't access the road around us. This is detrimental to the resident and school children that use this road daily. Please consider the knock on effect this will have and include nightingale lane (the whole road) and Eastfield in the school roads. Eastfield road has the entrance for reception, year 1 and year 2 children on it and yet this road has zero motor restrictions. It's on a crossroads with small children trying to enter their school every day - toddlers on scooter and bikes dodging traffic coming at them from 4 different ways with no adequate crossing - not to mention the fence has been being mended for several years so there's scaffolding forcing the kids to literally walk in the road. It's not acceptable to make Rectory road gardens a school road and not include the entire of nightingale lane and Eastfield in this. The school would massively benefit from some zebra crossings as well, so children and parents can cross safely outside of the school times. Honestly I'm shocked this hasn't been considered and that a road is being a made a school road when it doesn't have a school on it - yet the road next to it that will be greatly impacted by additional traffic because of this, does ! Make it make sense.
St Mary's C of E SS43	Support	I support this for environmental and safety reasons. This school and surrounding area suffer from horrible traffic and a school street would be transformative for the children and local residents.
St Mary's C of E SS43	Support	This is a street where kids are often trying to get and from school safely. Either to St Mary's or other schools in the proximity such as St Anns, Seven Sisters, Chestnuts and Park View. Cars need to be controlled and restricted as they are dangerous and polluting. They are particularly dangerous for children. Priority should be children, then adult pedestrians and cyclists.

St Mary's C of E SS43	Support	Because Rectory Gdns is a cut-through via Nightingale Lane to Hornsey High St., it has increased traffic congestion and speeding. Road calming measures (speed humps) would greatly help - especially on the blind side bend by #17.
St Mary's C of E SS43	Support	I recommend this goes ahead A.S.A.P. The exhaust pollution is unbearable for my asthmatic child - particularly in the colder days at drop off and pick-up times; as parents sit in their cars waiting with engines idling.
St Mary's C of E SS43	Support	Pollution is awful. All non-electric cards should be banned. People can take the bus and stop polluting the air.
St Mary's C of E SS43	Object	Hello I wish to object to the proposed school street. I live about 200 metres from the point the road will be closed during the times suggested. Both my children attended at Mary's priory school. I cycle to work and have done for 25 years. 1. It would have a disproportionate impact on the residents who live east of the permanent barriers on Hermitage , Vale and Eade road. Those roads have had a permanent barriers preventing through traffic from green lanes to St Ann's road since 2000. As residents of Oakdale road, we have to use hermitage road to go anywhere north or west . Closing the road during the morning rush hour would push this traffic onto seven sisters road the narrow roads on the Tiverton estate. 2. Morton and Tiverton road, which residents will be forced to use, are narrow roads with cars parked on both sides through a social housing estate. Visibility for both pedestrians and motorist is poor. 3. There is no congestion or problem parking with drop off and pick up of kids at the beginning and end of the school day. St Mary's put out traffic cones and encourage walking to school. Even a cursory assessment of what happens outside this school would demonstrate that your proposal seeks to solve a problem that does not exist at this school. 4. Closing the road will have no impact at all on childhood obesity. The parents who do drive their children to school will continue to do so, they will just drive through the narrow roads on the Tiverton estate. 5. Pollution will be increased not decreased due to longer journey times in cars. For example a member of our household drives to work in Barnet. They will have to drive through Tiverton estate, along seven sisters, back along at Ann's road . Currently they can simply drive up hermitage road and turn left on to St Ann's. 6. The LTN immediately north of this proposed school street has already made travel by car more difficult. The benefits and disbenefits of the LTN and other schemes like the school streets proposed are not shared equally by citizens, which undermines to their legitimacy weakens support for them. Oakdale road n4 .
St Mary's C of E SS43	Object	I don't know why I'm bothering to fill this out as it is quite clear that you are going to proceed with a School Street regardless despite 60% responding negatively to the 'consultation'. My objections are that the School Street is unnecessary since the street already has an all-day CPZ and that it restricts a large number of cars from over 1,000 households to only exiting via Nightingale Lane. If there are blockages as there sometime are - flooding, bin lorries, accidents - we are basically trapped in our road as there is no other easy exit
St Mary's C of E SS43	Object	Please find attached my consultation response.

St Mary's C of E SS43	Object	REFERENCE 2023-T10 We wish to strongly object to this proposal. Our house is in Nightingale Lane, very close to the junction with Rectory Gardens. We think no account has been taken of the increased pressure on our section of Nightingale Lane. At the proposed hours we already have constant back up outside our house, with motors running, and it includes many heavy vehicles, Thus is caused by the narrowness of the road and the junction itself. Our section on the road is very busy with pedestrians both on their way north, especially to Campsbourne School, and south towards Priory Road on to several secondary schools. There is a constant flow each way, before and after school, of young primary school children and younger siblings in pushchairs. We think the Planners have not taken into account how an increased level of particulates in our section will affect the very age group that it is supposed to be protecting. Rectory Gardens is already a quiet road, with well-established and observed extra protection at the school end. It also has such a successful CPZ that there are up to 30 empty spaces there every weekday, with some residents using our street area rather than the CPZ to park their cars presumably for financial reasons. We know that new traffic schemes inevitably bring inconvenience as well as benefits but since Nightingale Lane is already the main access and egress in our area, it is patently unfair to load it with even more vehicles, especially with stationary or low speed emissions . The consultation meeting, which we attended was very badly organised. Held in the school concerned, it was hardly a neutral affair and the people running the meeting did not make it clear who they were or what their stake was in the consultation. Only a few people on our street had received the information. We did not feel our points were actually listened to or that it was a formal consultation actually seeking our views. In our view the consultation process has not been valid. The effects on our section of Nightingale have not to our knowledge been properly analysed. The long delay in sorting out and effecting the CPZ for our street has added to our concerns that our air quality and road safety will deteriorate significantly. A final point is that although we have a 20mph limit, in clear times during the day cars routinely drive at much higher speeds without any fear of redress and it is becoming more and more hazardous to cross, for all ages of people.

St Mary's C of E SS43	Object	I am writing to object to the proposed changes outlined by the council for school roads. Whilst I understand the benefits that a low traffic and clean air zone would bring to the immediate area outside of the school. Ultimately, this is a wider, regional problem, which is being tackled by Tfl and the Mayor for London with the expansion of the ULEZ zone. These proposed changes by the council to restrict the movement of cars outside the school during certain times of the day will only compound traffic in the local area and move the problem else where, whilst complicating travel for many across the school and borough. Additionally, Staff at the school are concerned about the impact to children's punctuality and attendance - we have many children living and travelling into school, from outside the borough and these changes would impact on them the most. Due to a shortfall in Government funding and Haringey council rehousing and moving many families on social housing to cheaper, more affordable housing outside of the borough - this has lead to more families with ties to the school having to travel in. Ultimately, a reduction in the numbers of children attending school would compound these changes and further escalate recruitment and funding problems across the school in the near future. With numbers on roll potentially falling and recruitment becoming increasingly acute as a consequence, will Haringey Council step in to fund any short fall or take responsibility for any future redundancies because of their actions to implement school roads across the borough? Finally, being an active rider, I approached the council to improve the cycle to work scheme, as well as open the scheme up to include electric bikes. I was hoping to purchase an electric cargo bike to transport my two daughters to school and from school but the council cannot / will not improve their package - this could result in me having to purchase a car, thus adding to the pollution of the local area. The council should be actively supporting alternative means of travel and helping staff to make the switch from car to bike. Before the Council implements such actions, they should really engage with the local community, teaching staff from all schools and have drop in centres at each school site with a range of translators to communicate and engage with non-native English speakers about these changes and not rely upon a notifications on lampposts which could go amiss. I feel that this process has not been truly representative to all nor accessible - more should have been done to engage with all in the wider community.
St Mary's C of E SS43	Object	
St Mary's C of E SS43	Object	Not necessary - as road is overwhelmingly residents' parking
St Mary's C of E SS43	Object	Rectory is one of the quietest roads in the area. If parents drop off children at school, they can't park in Rectory because it is a permit parking area. The entry to Rectory road from the High Street is very busy and drivers should concentrate on driving safely rather than being distracted by reading detailed signs. This is another money-making exercise.
St Mary's C of E SS43	Object	Your letter refers to the council commitment to tackling climate pollution, but common sense tells me that road closures always create more traffic and pollution in the surrounding area; unless my common sense is different from yours.
St Mary's C of E SS43	Other view	Concerned about increased traffic and pollution on Nightingale Lane as the morning school drop off time is outside the proposed CPZ restrictions (which include Nightingale Lane) and which will apply from 10am - 4pm. Maybe have the CPZ operating from 8am?

St Mary's C of E SS43	Object	I have received a letter through the post regarding a proposed school street on Hermitage Road near St. Mary's school and I am responding to object to these proposals. The boundaries given restrict access to the residential areas of Oakdale Road, Ashfield Road, Beechfield Road and further along Hermitage road without granting an exemption for those properties. Access through Hermitage Road next to the school is the only practical way for residents to leave and return to their properties. Any residents in these properties would have to drive to the a504 and return through Templeton road to access their own homes, meaning more time spent and congestion on this already busy road. Furthermore, I do not see the reasoning behind restricting traffic on these roads. Due to the barrier in place on Hermitage Road, the road cannot be used to move between Seven Sister's and Green lanes. Traffic is already very minimal on Hermitage road and as such a School Street is not necessary. The implementation of a school street would only seek to disadvantage nearby residents and would mean that any school-time traffic would just spill out onto St Ann's Road, further disrupting any other passing motorists. I think this proposal has been ill thought out and doesn't take into account the issues that it would cause for the local residents and passing motorists. Oakdale Road
St Mary's C of E SS43	Object	Causes way too much backup of traffic for business. Our customers are always having parking and traffic issues because of congested roads. The scheme is not good for local businesses and causes added pollution, more traffic, and less business.
St Mary's C of E SS43	Object	Object to the SS because of further traffic displacement and congestion. Hornsey High St has become blocked with the load of traffic and road works. The SS will result in even heavier traffic and pollution in the area.
St Mary's C of E SS43	Support	I fully support this proposal
St Mary's C of E SS43	Support	Our children have a right to clean air and we have a duty to protect them from the harmful effects of pollution, regardless of the inconvenience to any and all drivers affected by the changes.
Lea Valley, Dukes Aldridge, the Vale SS37	Support	The timings in the morning, 8.30 - 9.15, are too late. There is a considerable amount of traffic entering the arrears between 8.15 and 8.30. With these roads before small and narrow this puts young people coming to school at risk of an accident. It also increases the car pollution in the area. With the changes my concern is that there will be an increase in cars between 8.15 - 8.30 in order to avoid the school street. Having restrictions from 8.15 until 9.15 would help mitigate these problems.
Lea Valley, Dukes Aldridge, the Vale SS37	Support	
Lea Valley, Dukes Aldridge, the Vale SS37	Support	Brilliant idea! I would support longer periods of restricted access.
Lea Valley, Dukes Aldridge, the Vale SS37	Support	It would be great if we could also stop school staff parking in residents' bays across the road from Dukes Aldridge. If you go out at the wrong time, you lose your spot for the bay! They are residents-only bays, but the parents still park there.
Lea Valley, Dukes Aldridge, the Vale SS37	Support	Many cars sit with engines idling outside the school. This is bad for residents and children, so I'm very happy to hear this road will now be a school street

Lea Valley, Dukes Aldridge, the Vale SS37	Object	DUPLICATE SUBMISSION I am writing to object to the proposed changes outlined by the council for school roads. Whilst I understand the benefits that a low traffic and clean air zone would bring to the immediate area outside of the school. Ultimately, this is a wider, regional problem, which is being tackled by Tfl and the Mayor for London with the expansion of the ULEZ zone. These proposed changes by the council to restrict the movement of cars outside the school during certain times of the day will only compound traffic in the local area and move the problem elsewhere, whilst complicating travel for many across the school and borough. Additionally, Staff at the school are concerned about the impact to children's punctuality and attendance - we have many children living and travelling into school, from outside the borough and these changes would impact on them the most. Due to a shortfall in Government funding and Haringey council rehousing and moving many families on social housing to cheaper, more affordable housing outside of the borough - this has lead to more families with ties to the school having to travel in. Ultimately, a reduction in the numbers of children attending school would compound these changes and further escalate recruitment and funding problems across the school in the near future. With numbers on roll potentially falling and recruitment becoming increasingly acute as a consequence, will Haringey Council step in to fund any short fall or take responsibility for any future redundancies because of their actions to implement school roads across the borough? Finally, being an active rider, I approached the council to improve the cycle to work scheme, as well as open the scheme up to include electric bikes. I was hoping to purchase an electric cargo bike to transport my two daughters to school and from school, but the council cannot / will not improve their package - this could result in me having to purchase a car, thus adding to the pollution of the local area. The council should be actively supporting alternative means of travel and helping staff to make the switch from car to bike. Before the Council implements such actions, they should really engage with the local community, teaching staff from all schools and have drop in centres at each school site with a range of translators to communicate and engage with non-native English speakers about these changes and not rely upon a notifications on lampposts which could go amiss. I feel that this process has not been truly representative to all nor accessible - more should have been done to engage with all in the wider community.

Lea Valley, Dukes Aldridge, the Vale SS37	Object	DUPLICATE SUBMISSION To whom it may concern, I am writing to object to the proposed changes outlined by the council for school roads. Whilst I understand the benefits that a low traffic and clean air zone would bring to the immediate area outside of the school. Ultimately, this is a wider, regional problem, which is being tackled by Tfl and the Mayor for London with the expansion of the ULEZ zone. These proposed changes by the council to restrict the movement of cars outside the school during certain times of the day will only compound traffic in the local area and move the problem elsewhere, whilst complicating travel for many across the school and borough. Additionally, Staff at the school are concerned about the impact to children's punctuality and attendance - we have many children living and travelling into school, from outside the borough and these changes would impact on them the most. Due to a shortfall in Government funding and Haringey council rehousing and moving many families on social housing to cheaper, more affordable housing outside of the borough - this has led to more families with ties to the school having to travel in. Ultimately, a reduction in the numbers of children attending school would compound these changes and further escalate recruitment and funding problems across the school in the near future. With numbers on roll potentially falling and recruitment becoming increasingly acute as a consequence, will Haringey Council step in to fund any short fall or take responsibility for any future redundancies because of their actions to implement school roads across the borough? Finally, being an active rider, I approached the council to improve the cycle to work scheme, as well as open the scheme up to include electric bikes. I was hoping to purchase an electric cargo bike to transport my two daughters to school and from school, but the council cannot / will not improve their package - this could result in me having to purchase a car, thus adding to the pollution of the local area. The council should be actively supporting alternative means of travel and helping staff to make the switch from car to bike. Before the Council implements such actions, they should really engage with the local community, teaching staff from all schools and have drop in centres at each school site with a range of translators to communicate and engage with non-native English speakers about these changes and not rely upon a notifications on lampposts which could go amiss. I feel that this process has not been truly representative to all nor accessible - more should have been done to engage with all in the wider community. Additionally, only providing 10% of staff with a permit to enter and exit roads during the operating times of the restrictions does not take into consideration that they might need to leave early due to family commitments or emergencies. More permits should be provided to staff in the operational zones.
Lea Valley, Dukes Aldridge, the Vale SS37	Object	If this SS is approved, please allow 1 or 2 nominated relatives / close friends (who are not technically carers, but who do provide support) to be given exemptions.
Lea Valley, Dukes Aldridge, the Vale SS37	Object	Signage should also be painted on the road (as with 20 mph), so ass to give drivers every chance to be aware and turn off in good time. If drivers are looking up and around at signs, they might hit a child who suddenly runs in front of the car.!
Lea Valley, Dukes Aldridge, the Vale SS37	Object	We don't get a lot of cars. There are so many mums and children walking that I have to walk in the road! If the small park at the bottom of my road was tarmacked, it could be used as a pick-up and drop-off point, as well as a car park for teachers.

Lea Valley, Dukes Aldridge, the Vale SS37	Other view	Instead of wasting taxpayers' money on stupid road signs; cut the council tax and help the people you c**** !!
Lea Valley, Dukes Aldridge, the Vale SS37	Other view	I think that our flat at the top on Level 9 all the bad people come, and my children are getting scared. This is a main concern that I have; and my recommendation is tat we want a park for our children. We have containers in the garden, and we don't want these.
Lea Valley, Dukes Aldridge, the Vale SS37	Support	Our children have a right to clean air, and we have a duty to protect them from the harmful effects of pollution, regardless of the inconvenience to any and all drivers affected by the changes.
North Harringay Primary SS34 & 35	Support	I think it's great that these proposals will encourage children and parents to walk/ take public transport to school and discourage using their own vehicles to come to the area. This area includes Wightman Road and all roads connecting off Wightman as there will be a knock on effect from added pick-ups from private vehicles. It's therefore imperative that the school gives a clear message to parents that no stopping will be allowed on Wightman Road unless there is an exemption and these should be limited to special circumstances under the disability act. The schools will have to arrange for volunteers or members of staff to police this daily, twice/ day at arrival and departure times of the school day.
North Harringay Primary SS34 & 35	Support	100% in support of reducing traffic, particularly around the school, for both safety, sustainability, and pollution reasons.
North Harringay Primary SS34 & 35	Support	A school street would be great for all children living near and attending North Harringay Primary School. It would improve air quality and street safety, and make it much easier for children to walk and cycle to school. Living opposite the school I have seen near misses with traffic using Frobisher Road at drop off and pick up time - I think it's so important to make these changes before a terrible accident, rather than waiting for something to force us to act. A school street would benefit the whole community, as would wider traffic reduction measures across the Ladder. It can't happen soon enough.
North Harringay Primary SS34 & 35	Support	Agree
North Harringay Primary SS34 & 35	Support	As a local resident and parent I cannot wait to see some changes in traffic levels in the area. This is hopefully the start of man other positive changes to come.
North Harringay Primary SS34 & 35	Support	As a resident, I wholly support the introduction of school streets in Harringay and has been long awaited. In addition, to make streets even safer, the introduction of the council's LTN plans should be agreed without further delay. It's imperative children, young people, adults and families not only feel safe around School opening and closing times, but on ALL roads in the area and sadly that is far from the reality. Reduced traffic on our roads has been needed since C19 lockdown and I would like it noted that as a resident the delay to curb increased traffic since lockdown restrictions were lifted has been disastrous for residents mental/physical health, wellbeing, and the environment. ACTION IS NEEDED NOW!
North Harringay Primary SS34 & 35	Support	Cars speed up the road relentlessly, groups of children cross the road at school time, it's only a matter of time until a child is hit.
North Harringay Primary SS34 & 35	Support	Crossings need to be added on Wightman Road, allowing children, parents and all residents to cross Wightman Road close to the proposed changes on Frobisher Road

North Harringay Primary SS34 & 35	Support	Good idea
North Harringay Primary SS34 & 35	Support	Great idea
North Harringay Primary SS34 & 35	Support	I agree with these measures, for children and adult safety from pollution and traffic. If anything they would ideally be extended to whole school hours (for pollution reasons) and on the surrounding streets to encourage more active travel.
North Harringay Primary SS34 & 35	Support	I full support the school streets for the ladders as it will improve safety and air quality directly out the front of the schools. However, given the nature of the Ladder streets, vehicles will simply use another rung not reducing traffic overall. As traffic will be concentrated down fewer streets, it will make it more difficult for children to cross these streets. This is my current experience on Fairfax Road. Therefore additional safety crossing measures are required along the Ladder streets that are not directly part of the school street closures - such as zebra crossing, raised crossing, increased pavement width and decreased road width at crossing points. This is also important for older children crossing the ladder streets that may have less patience to wait.
North Harringay Primary SS34 & 35	Support	I fully approve of prioritising the needs of children by creating play streets
North Harringay Primary SS34 & 35	Support	I fully support the introduction of school streets on the Harringay Ladder.
North Harringay Primary SS34 & 35	Support	I fully support these proposals to make children safer and improve the experience of those using green and active ways to get to school. Traffic at school drop off and pickup can be intimidating and poorly behaved.
North Harringay Primary SS34 & 35	Support	I fully support this proposal - it will encourage walking and cycling to school and reduce road danger for everyone involved in the school
North Harringay Primary SS34 & 35	Support	I support the proposed school street provided residents of the street are exempt. I would also support a cycling contraflow in Ladder one way streets, and I would like to see enforcement of the speed limit.
North Harringay Primary SS34 & 35	Support	I support this initiative. However, ongoing review is needed on how much this impacts adjacent streets and/or whether this pushes the problem of parents dropping their kids using cars into the adjacent streets.
North Harringay Primary SS34 & 35	Support	I wholly support the proposal, which will help improve the health and safety of pupils
North Harringay Primary SS34 & 35	Support	I wholly support this proposal as it has clear safety benefits for children and parents.
North Harringay Primary SS34 & 35	Support	I would support any measure that has the effect of reducing traffic movements on ladder roads. If this school street proposal goes ahead it may well lead to some determined school drivers lingering near the passage in adjacent ladder roads (i.e. Frobisher and Fairfax) so I welcome the proposal to apply restrictions to Frobisher. Perhaps Fairfax should be added too.

North Harringay Primary SS34 & 35	Support	Love the idea! Fully support.
North Harringay Primary SS34 & 35	Support	Our children have a right to clean air, and we have a duty to protect them from the harmful effects of pollution, regardless of the inconvenience to any and all drivers affected by the changes.
North Harringay Primary SS34 & 35	Support	School streets are a total no-brainer - why would you want to risk children's lives for the convenience of a few drivers who pollute the air?
North Harringay Primary SS34 & 35	Support	The health and safety is paramount, by reducing traffic and resulting air pollution a healthy environment can be achieved benefiting all concerned.
North Harringay Primary SS34 & 35	Support	The Ladder desperately needs less through motor traffic, particularly to ensure the safety of school students
North Harringay Primary SS34 & 35	Support	The road is clogged up every day with parents dropping their kids off, leaving their cars running and taking up parking spaces so residents can no longer park there. I think this measure would be very helpful in reducing this congestion and pollution.
North Harringay Primary SS34 & 35	Support	This is a much needed addition to increase safety and improve air quality
North Harringay Primary SS34 & 35	Support	This is an excellent idea to make the streets safer for children, reduce pollution and encourage active travel. Please install these around every school.
North Harringay Primary SS34 & 35	Support	Traffic is dreadful on the ladder we need this and more Wightman road calming measures have not worked something else needed on Turnpike Lane
North Harringay Primary SS34 & 35	Support	Whilst I generally support the implementation of school streets, the nature of the Harringay Ladder will mean that the traffic that currently uses Falkland Rd and Frobisher Rd during the proposed period of motor vehicle traffic prohibition will be pushed onto neighbouring roads. Other traffic calming initiatives in the borough have already increased traffic levels on these roads to an unacceptable level, with rush hour traffic jams now being the norm. This is already having a negative impact of the health of all residents of the affected streets, including children and will only get worse should the school streets be implemented as proposed. I would welcome the council introducing additional measures alongside the proposed school streets to control the resulting traffic displacement and the compounded impact on the health and wellbeing of affected residents.
North Harringay Primary SS34 & 35	Support	Would walk more with this.
North Harringay Primary SS34 & 35	Support	
North Harringay Primary SS34 & 35	Support	

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North Harringay Primary SS34 & 35	Support	Extend times from 8am to 10am in the morning, and form 2.30pm to 4.15pm in the afternoon. Falkland and Frobisher are ladder roads which are used as rat runs and are affected by traffic noise and air pollution
North Harringay Primary SS34 & 35	Support	Fix broken roads and pavements. Reduce speeding cars. Area needs cleaning
North Harringay Primary SS34 & 35	Support	Fully support this for N Harringay School. Obviously the measures will impact us - Fairfax Rd being adjacent; but we support any plans that may reduce the traffic overall. No one should be driving their children to primary school.
North Harringay Primary SS34 & 35	Support	Great idea, as there is too much traffic and noise on the road.
North Harringay Primary SS34 & 35	Support	It's going to be a good thing, There are far too many cars in London. People should walk, and use public transport more!
North Harringay Primary SS34 & 35	Support	Looking forward to fresher air on our walks to and from school!

North Harringay Primary SS34 & 35	Support	Looking forward to fresher air on our walks to school!
North Harringay Primary SS34 & 35	Support	need to avoid / mitigate congestion on Wightman Rd as a result of SS on Frobisher and Falkland roads
North Harringay Primary SS34 & 35	Support	Nothing to add - full support.
North Harringay Primary SS34 & 35	Support	Nursery children finish at midday and then some more arrive at that time. It would be good for you not to allow cars at this time as well. I also think times should start at 8.15am and run to 9.15, as some kids go in for breakfast club.
North Harringay Primary SS34 & 35	Support	Parking exemption extension: We live on Wightman Rd opposite Frobisher Rd. The limited parking space on Wightman is alleviated by spaces on Frobisher. I would ask that houses on the section of Wightman Rd. adjacent to Frobisher Road should be given SS exemption. Thanks
North Harringay Primary SS34 & 35	Support	Sounds good to me especially as I bike a lot on Frobisher
North Harringay Primary SS34 & 35	Support	Strongly support.. Question: How will the SS be enforced? Cameras?
North Harringay Primary SS34 & 35	Support	Support fully. Suggest further restrictions on ladder roads in future to avoid rat running. I also suggest providing more information on how you prevent an increase in traffic on adjacent ladder roads; given that the SS may have knock-on safety concerns.
North Harringay Primary SS34 & 35	Support	We are concerned about traffic displaced to neighbouring roads at school drop-off and collection times - especially around the Passage. Children walking through the passage to school will be equally affected by traffic on Lausanne Rd. Please monitor traffic levels and consider widening the area within the SS to include Lausanne and Fairfax roads.
North Harringay Primary SS34 & 35	Support	We are delighted that a new school street will be introduced, and we very much welcome the safer environment it will create for children in the area. Our child has asthma, and this project will really help her and other children to grow up with healthier air and safer streets.
North Harringay Primary SS34 & 35	Support	We strongly support the initiative!

North Harringay Primary SS34 & 35	Object	Hello. I live on a neighbouring street to the school. I see no evidence in any of the materials that school streets truly improve child health. There is no data provided whatsoever. What I do hear from other school streets in the area is not that there has been an improvement in child health. But rather, that they believe this is a revenue driving initiative due to lack of any health data and the Penalty Charge Notices. So not only have you provided no proof that this is a beneficial arrangement but living on Fairfax Road, this will clearly increase traffic on my road. We have seen evidence of this whenever roadworks take place on surrounding roads. During a period where Thames Water was carrying out what it considered minor works, the road was filled with idling cars alongside the children's park on this road. Pollution was noticeably more. So I object to this proposal which simply moves the pollution away from two roads onto the other nearby roads. There is neither evidence this works presented; nor any other more useful schemes that might cut traffic (organised walks to school with a responsible adult, bike grants etc). I have extensively read such documents as this - https://content.tfl.gov.uk/getting-to-know-school-streets-case-studies-2022.pdf - which present the case for school streets. But I note all the feedback is about the school streets with no real consideration given to surrounding streets. Most of the data is qualitative and the sources given for quantitative data are press releases! Unfortunately there is no independent scientific data about the impact on the surrounding area. I would certainly not approve any such research in my own professional role as it would be seen as simply a PR exercise rather than offering value. If you want to improve road safety near this school, I suggest improving the incredibly dangerous scenario on Wightman Road where I regularly see collisions or near collisions. I was involved in a near collision last week because the chicanes are very dangerous. I would like to support a real solution to improve child safety. I believe this is not a good proposal.
North Harringay Primary SS34 & 35	Object	I agree with timed school streets for drop off and pick up. As a resident of the ladder for more than 15 years the traffic is low so any road closures on the ladder would have a severe effect on the surrounding areas effecting us all.
North Harringay Primary SS34 & 35	Object	I object to this proposal and SS34. I am a resident of Frobisher road and our home has 3 cars. The proposal states that only 2 cars can be allowed a permit. This would cause hassle for our house hold. Furthermore, if we ever had guests visiting with their cars we do not want the extra hassle of them possibly getting a ticket. This is just another money grab by the council and as residents on this street for more than 20 years, we want no part of it.
North Harringay Primary SS34 & 35	Object	DUPLICATE I object to this proposal and SS34. I am a resident of Frobisher road and our home has 3 cars. The proposal states that only 2 cars can be allowed a permit. This would cause hassle for our house hold. Furthermore, if we ever had guests visiting with their cars we do not want the extra hassle of them possibly getting a ticket. This is just another money grab by the council and as residents on this street for more than 20 years, we want no part of it.
North Harringay Primary SS34 & 35	Object	I strongly object to this proposal due to the additional traffic that we will suffer on Fairfax road. Fairfax road is already one of the busiest on the ladder and we already suffer an unfair proportion of traffic and pollution. This proposal will make the situation worse for us. Traffic will also idle and stop at the park to deliver children to school, as they do already. So rather than solving the problem, will just move it across and doubling the problem on Fairfax. We ask you not to make Fairfax road, a residential road where many children live, worse.

North Harringay Primary SS34 & 35	Object	I wholly object to the proposal of SS35 because I believe insufficient evidence has been provided to determine the need to implement school streets around North Haringey Primary School - SS35. The council HAS NOT provided sufficient evidence that the N02 levels or traffic levels are at a level that would cause concern for residents health and therefore clearly not demonstrating a need for implementation. The councils HAS shared the following data as a result of the informal consultation: 1. 85% of pupils walks to the school. 5% take public transport to the school. 10% of go by car to the school. 2. N02 levels provided are dated from 2016 which means this data is 7 years out of date and obsolete and does not provide an accurate picture of what those levels are in 2023. Currently only 10% of pupils are driven to school which I believe is a relatively low number (although agree this is subjective). I believe the implementation of SS35 will force any traffic to the neighbouring roads, increasing car fumes and traffic volume onto those roads. Fairfax Road is already very congested at peak times, and drivers will likely use Fairfax Road instead therefore increasing traffic and fumes on Fairfax Road and negatively impacting the health of those residents. I agree more needs to be done to reduce traffic and improve air quality, but I don't believe SS35 is a solution to that. It would only displace the traffic and air quality to neighbouring roads and does not solve the issue. I would like to see the following action from Haringey Council as part of this formal consultation: 1. Hard evidence and data show clearly demonstrating the CURRENT N02 and traffic volume levels on the 2 proposed streets for SS35. By current, I mean data from the last 2 years. Anything older than 2 years old is obsolete. 2. Hard evidence to show CURRENT N02 levels and traffic volume levels for neighbouring roads to SS35, by neighbouring I am referring to; Hampden Road, Lausanne Road, Fairfax Road, Effingham Road. By current, I mean data from the last 2 years. Anything older than 2 years old is obsolete. 3. Any data to be compared to other inner city existing school streets and proposed school streets. The data CANNOT be used in isolation and must have some form of benchmark so it can be compared and contrasted. For example. - a. For existing school streets, what % of pupils went to school by car BEFORE the school streets were implement so we can see if 10% for North Haringey Primary School is low / high compared to those schools with restrictions already implemented. - b. What were the N02 levels before and after school streets were implemented. 4. Open townhall / forum for residents to present cases for and against SS35. 5. Revenue Haringey council makes from fines imposed on drivers driving into school street during restriction times. Haringey Council is a business funded (in part) by taxpayers money and therefore needs to be transparent about how much will be made from these fines. Unless Haringey Council is able to provide up-to-date, sufficient, hard data and evidence to clearly demonstrate the need to implement SS35, any implementation will be done so in a vacuum based on purely subjective and anecdotal desires and a misuse of taxpayers' money.

North Harringay Primary SS34 & 35	Object	DUPLICATE I am writing to object to the proposed changes outlined by the council for school roads. Whilst I understand the benefits that a low traffic and clean air zone would bring to the immediate area outside of the school. Ultimately, this is a wider, regional problem, which is being tackled by Tfl and the Mayor for London with the expansion of the ULEZ zone. These proposed changes by the council to restrict the movement of cars outside the school during certain times of the day will only compound traffic in the local area and move the problem elsewhere, whilst complicating travel for many across the school and borough. Additionally, Staff at the school are concerned about the impact to children's punctuality and attendance - we have many children living and travelling into school, from outside the borough and these changes would impact on them the most. Due to a shortfall in Government funding and Haringey council rehousing and moving many families on social housing to cheaper, more affordable housing outside of the borough - this has led to more families with ties to the school having to travel in. Ultimately, a reduction in the numbers of children attending school would compound these changes and further escalate recruitment and funding problems across the school in the near future. With numbers on roll potentially falling and recruitment becoming increasingly acute as a consequence, will Haringey Council step in to fund any short fall or take responsibility for any future redundancies because of their actions to implement school roads across the borough? Finally, being an active rider, I approached the council to improve the cycle to work scheme, as well as open the scheme up to include electric bikes. I was hoping to purchase an electric cargo bike to transport my two daughters to school and from school, but the council cannot / will not improve their package - this could result in me having to purchase a car, thus adding to the pollution of the local area. The council should be actively supporting alternative means of travel and helping staff to make the switch from car to bike. Before the Council implements such actions, they should really engage with the local community, teaching staff from all schools and have drop in centres at each school site with a range of translators to communicate and engage with non-native English speakers about these changes and not rely upon a notifications on lampposts which could go amiss. I feel that this process has not been truly representative to all nor accessible - more should have been done to engage with all in the wider community.

North Harringay Primary SS34 & 35	Object	I am writing to offer my objection to the proposed School Street, on the basis of lack of evidence. In the school street statement, you have stated 'the council is committed to tackling the climate emergency and the escalating levels of pollution at peak times on our road network. Childhood obesity in the borough is also one of the highest in London'. This is the justification of the project. I appreciate the traffic accident statement if there are traffic accidents on the street. With relation to these issues: - The climate emergency will only be addressed by this project is there is a reduction in car use across the borough. There is no evidence to suggest that parents will change their car use. As a resident of Fairfax road, we are actually quite concerned about the spill over into our road. I know some of the children live here too. - Escalating levels of pollution. Again, although I appreciate a reduction in pollution for one street, this will be a trade off, unless traffic reduces. The vast majority of children will live in other streets, that could in fact see a decrease in air quality as a result of this project. This will only be addressed by reducing car use. This is known as a negative spill over. - Childhood obesity. Again, there is no evidence to suggest that obesity will be affected at all by such a scheme. To be blunt, it is clear to our community that this is a revenue driver, and the business, sorry I meant economic, case for doing this is driven by an increase in fines from motorists. We have been given no scientific evidence for the overall reduction in NOx, SOx and PM2.5-10 for the community where these children live, carbon reductions and obesity reductions. No objectives or targets have been provided over any timeframe. I personally find it disappointing that the local members will hide behind spurious statements about tackling climate change, etc - when they have criticised the party in national power for doing just that. This is what makes people cynical about politics. I am a resident that has created businesses that have abated over 100,0
North Harringay Primary SS34 & 35	Object	
North Harringay Primary SS34 & 35	Object	
North Harringay Primary SS34 & 35	Object	All the traffic will come down our road which already has enough traffic. It is appalling to subject residents of this road to more congestion and pollution. The school does not need this, as parents and children use Harringay Passage to go to and from the school. Many people objected to this and it should not be happening. It's already very bad on this road at morning and evening rush hours
North Harringay Primary SS34 & 35	Object	Closing two main Ladder roads twice a day will only bring extreme congestion on to adjacent roads; as well as increasing pollution for the children you're trying to protect. It will also make life more difficult for residents.

North Harringay Primary SS34 & 35	Object	Denying access to both Frobisher and Falkland roads every day will be a disaster for parents / carers who will have more difficulty getting to school. Also, elderly residents like me will have major difficulties getting deliveries and services. The SS will cause more congestion on outlying roads with motorists trying to go to and from Green Lanes to Wightman Rd. The ladder with present traffic cannot afford the daily closure of 2 roads. I'm totally against this as the only benefit will be for Haringey issuing fines.
North Harringay Primary SS34 & 35	Object	Frobisher is a one-way road with speed humps and a 20mph limit. Traffic is generally light, and the calming measures seem to work. I feel that the SS proposals are unnecessary. Maybe speed cameras (operating 24/7) would be more effective.
North Harringay Primary SS34 & 35	Object	I am disabled and have lived here for many years. My family need free access to me at all times as I need assistance. I will not be able to walk to the end of the road to meet them. few if any drive their children to school and this scheme will only serve to create more congestion and pollution in the surrounding area - just like the rubbish LTNs. Please don't do this.
North Harringay Primary SS34 & 35	Object	I think perhaps other measures should be used like stopping car use in certain zones and subsidise public transport. My concern is that spill over traffic will happen on adjacent roads like mine (Fairfax Rd).
North Harringay Primary SS34 & 35	Object	I'm fed up with piecemeal solutions. Pollution is a problem everywhere and I'm not keen on having even more traffic on neighbouring roads
North Harringay Primary SS34 & 35	Object	No adequate data provided on benefits / negatives for all SS. Doubt that air quality will be improved as cars will switch to Fairfax and Lausanne roads; and it will lead to more traffic jams and greater emissions. Simple. Cars will idle on Fairfax waiting for children. Blocked traffic will also increase emissions at Fairland Park. I have conducted my own survey;;;;;; Mon 4 Dec: 3.30 -4.15 = 43 cars. Tues 5th Dec. 3.00- 4.00 = 41 cars. Wed 6 Dec. 3.35 - 4.45 = 56 cars. There is a tailback to the Park from Green Lanes. 72 cars were stationary pumping out fumes. Please consider this as evidence. Thank you
North Harringay Primary SS34 & 35	Object	None
North Harringay Primary SS34 & 35	Object	Strongly object. Traffic is already bad at the junction of Fairfax and Green Lanes, and the proposed scheme will lead to more traffic down Fairfax Rd - with more idling cars and pollution here. Also, more idling cars on Fairfax next to the park as parents wait for their children to come out of school. Children regularly play in the park after school.
North Harringay Primary SS34 & 35	Object	This will cause traffic congestion on both neighbouring roads - as well as more pollution. You are simply displacing congestion to Lausanne and Fairfax roads. There is already so much traffic congestion because of LTNs that this will be a nightmare
North Harringay Primary SS34 & 35	Object	You need to concentrate on road safety, not making money. Users need access to the road to drop off children and so on.

North Harringay Primary SS34 & 35	Other view	Dear Haringey School Streets Team, Thank you for your recent correspondence re. School Street - Falkland Road, N8 SS34 and SS35. Our ground floor flat is no. xxt Wightman Road, which has been omitted from the boundary zone. Our property has direct access onto Wightman Road through a back passage way, shared with 1 Falkland Road. This is often our main entrance to the house when unloading the car. We also usually park on Falkland Road, and have done since we moved here in 2018. Please could I make a request that our vehicle be given an exemption? With thanks in advance for your consideration,
North Harringay Primary SS34 & 35	Other view	Thank you for seeking our feedback regarding the proposal for a School Street on Falkland Road, N8 0NS. Although we are, in general, supportive of the underlying motivations for the scheme - reduction of congestion and pollution, and improvements in child safety and physical activity - we strongly object to the Council's proposed scheme. We set out our rationale below. 1. The proposed School Street will prohibit vehicular access to Falkland Road for a substantial proportion of the working day. The exemption for residents is only useful to those households who own, and can therefore register, their own motor vehicle. It is not helpful to those who use car clubs or ride sharing apps, or to those who car share. The scheme therefore perversely increases the incentive to own and keep a motor vehicle in the School Street. The proposed scheme will make it extremely difficult to arrange for deliveries or tradespeople to attend addresses on Falkland Road. The proposed morning hours overlap substantially with when many tradespeople start work, and most delivery companies do not allow recipients to specify time to attend or avoid. The scheme will therefore bring increased costs and inconvenience to residents. 2. There is a significant problem with antisocial driving, speeding and traffic law violation on the Harringay Ladder. The Council, in conjunction with the Metropolitan Police, need to embark on a much broader piece of work to address these issues. While the proposed scheme will prevent problematic driving on Falkland Road during the hours in which it is in operation, it will do nothing to tackle the underlying problem, and will simply shift traffic, congestion and poor behaviour to neighbouring streets. 3. The proposed scheme does nothing to address the issues that prevent people on Falkland Road from walking or cycling. These issues include pavements that are blocked by bins, fly tipped rubbish and inappropriately parked hire bicycles, and the lack of on-street stabling facilities for bicycles. In summary, we are extremely concerned that basic and foreseeable issues with the proposal do not see
North Harringay Primary SS34 & 35	Support	Walking my children to school at North Harringay has been made more difficult and dangerous because of heavy motor vehicle traffic on the ladder roads - especially vehicles that are being driven too fast and drivers parking their vehicles on the marked no parking area outside the school. As the two roads by the school have the greatest footfall, with parents and pupils filling the pavement, this School Street would significantly reduce the risk. Reducing vehicle traffic throughout the ladder would be even better.

North Harringay Primary SS34 & 35	Object	I was disappointed to learn of the proposed School Street initiative planned around North Harringay Primary School. My daughter attends the school (in Year 1) and the proposal appears to misunderstand how students travel to and from the school. The vast majority of students already walk, cycle, scoot, etc. with their parents. I note that the benefits highlighted include: i) reducing traffic volumes outside school; and ii) reducing traffic congestion. Please would you advise what studies were undertaken to analyse current traffic volumes? When has this been highlighted as an issue? I take my child too and from school regularly and have never borne witness to an excess level of traffic. What will of course be extremely frustrating for parents is that, when they do need to drop their child off or pick them up in a car, they will now need to do so on already very busy and congested streets (Wightman Road or Green Lanes) and then walk them down a quiet residential street to the school. As an example, my neighbour (who lives on Hewitt Rd) is a secondary school teacher in North London and often drops her daughter off before continuing on to her own school. She commutes using an electric vehicle. The new scheme will be an inconvenience for her. More frustrating, was the other benefit you highlight i.e. making it safer to walk, cycle, scoot, etc. to school. As I said, the vast majority of students and parents travel in one of these ways already. However, the vast majority do not live on Falkland Road or Frobisher Road (the streets impacted by the planned scheme). Though they do live on one of the surrounding roads. The route that is (pleasantly) congested in the mornings is the pedestrianised Haringey Passage which runs right beside the school. A much more effective mechanism for protecting kids and supporting those who walk, cycle, scoot, etc. would have been a scheme of zebra crossings where this passage intersects with the Haringey Ladder streets making it clear that pedestrians have the right of way. I pointed this out during the informal consultation process. Please would you explain
North Harringay Primary SS34 & 35	Support	As a local resident and parent of two children, I am worried about the impact it will have neighbouring roads. We already have many people parking on Fairfax for school drop off, so I am concerned it will increase traffic, with more cars getting stuck in jams and more fumes being pumped into the air. We already have a number of points in the day when traffic gets very backed up. This will increase this issue.
North Harringay Primary SS34 & 35	Support	I fully support the schools street proposals, which are proportionate and will be effective in promoting safer active travel to North Harringay. My daughter will likely start at this school in the next year, and I would be very pleased if these plans are in place by then.
North Harringay Primary SS34 & 35	Support	My children go to North Haringey Primary School. We walk to school and are shocked by the number of people who drive down the school streets breaking the speed limits and creating danger for children. I wholly support the restriction on cars for environmental reasons as well.
North Harringay Primary SS34 & 35	Support	My children have to walk through here on the way to their school (a different school) and making walking along the Harringay Passage to schools as safe as possible should be a priority - I think there are nearly a thousand children attending North and South Harringay schools and they all need a safe and healthy route to school.
North Harringay Primary SS34 & 35	Support	I think the streets around school should be closed around drop off and pick up times for safety. The vast majority of families walk to school or take public transport. Visibility can be difficult, because of large numbers of people and cars, and young children especially are at risk. Also pollution is a big problem and children should be shielded from this at school.

North Harringay Primary SS34 & 35	Object	My father is elderly and has to have carers attending 3 times a day. This scheme will badly affect him and the carers. Please reconsider
South Harringay Primary SS40 & 41	Support	
South Harringay Primary SS40 & 41	Support	
South Harringay Primary SS40 & 41	Support	.
South Harringay Primary SS40 & 41	Support	1. It seems odd to be simultaneously proposing the introduction of electric vehicle charging points (EVCPs) - 2023/24 Batch 1, on Pemberton Road when proposing the introduction of a School Street, which will encourage increased traffic - from occupants of adjoining streets wishing to use the charging facilities, and to prevent access to those charging points at key times of the day, Monday to Friday. 2. There should be specific provision for short term parking by delivery drivers, other than Royal Mail, on Wightman Road. accessible during the hours Pemberton Road is inaccessible for such deliveries.
South Harringay Primary SS40 & 41	Support	100% in support of reducing traffic, particularly around the school, for both safety, sustainability, and pollution reasons.
South Harringay Primary SS40 & 41	Support	agree on closed school streets
South Harringay Primary SS40 & 41	Support	Agree there should be traffic and parking restrictions near South Harringay School to improve air quality and child safety
South Harringay Primary SS40 & 41	Support	Agree with proposal
South Harringay Primary SS40 & 41	Support	any effort to reduce overall traffic and congestion during school times should be implemented, in my opinion
South Harringay Primary SS40 & 41	Support	as a local and a parent I'm concerned about the levels of traffic pollution around the school
South Harringay Primary SS40 & 41	Support	As a local resident and parent I cannot wait to see some changes in traffic levels in the area. This is hopefully the start of man other positive changes to come.
South Harringay Primary SS40 & 41	Support	As a resident of the ladder who cycles her own children past the roads leading to this school every day I fully support this proposal. I hope it will reduce the volume of traffic in the area around school drop off and pick up times and create a safer environment for the many families who walk, scoot and cycle to school.

South Harringay Primary SS40 & 41	Support	Consider exemptions for access to houses. For example dog walkers, deliveries etc. If we are allowed to drive our car for access, it makes sense (equivalent) to allow services for access. Otherwise we are not able to receive basic services. The intent is to eliminate cut through traffic and school drop offs. Not to disadvantage residents. Could we apply for an Exemption for a specific vehicle we know visits our property?
South Harringay Primary SS40 & 41	Support	Fully agree there should be traffic and parking restrictions for safety and also for air quality
South Harringay Primary SS40 & 41	Support	Fully support traffic reductions as children go in and out of school supporting active travel, improving air quality, and improving safety.
South Harringay Primary SS40 & 41	Support	I 100% support making schools safer and improving air quality for children.
South Harringay Primary SS40 & 41	Support	I agree with these measures, for children and adult safety from pollution and traffic. If anything they would ideally be extended to whole school hours (for pollution reasons) and on the surrounding streets to encourage more active travel.
South Harringay Primary SS40 & 41	Support	I full support the school streets for the ladder roads. However, traffic will be concentrated in fewer streets, it will make it more difficult for children to cross them.
South Harringay Primary SS40 & 41	Support	I fully support school streets being implemented on these roads. The council also need to address traffic calming measures along Green Lanes and the whole of the Ladder.
South Harringay Primary SS40 & 41	Support	I fully support this initiative to make the streets safer for children, reduce pollution and improve the environment.
South Harringay Primary SS40 & 41	Support	I fully support this proposal
South Harringay Primary SS40 & 41	Support	I support the intent, and many points of implementation. However, I am concerned that this could cause access issues for legitimate resident services, such as necessary workmen (conducting repairs or renovations), deliveries, or other important services (eg supporting care for dependents, welfare and animal welfare, etc).
South Harringay Primary SS40 & 41	Support	I support the introduction of this school street as I think it will make my children’s journeys to and from their school safer and healthier.
South Harringay Primary SS40 & 41	Support	I support the proposal
South Harringay Primary SS40 & 41	Support	I support the proposal for Pemberton Road to become a school street provided residents are exempt. My only qualification is that I would like the residential exemption to extend to residents' visitors.
South Harringay Primary SS40 & 41	Support	I support this

South Harringay Primary SS40 & 41	Support	I wholly support the school street for safety reasons on Pemberton road. I live opposite the school and often see cars speeding down Pemberton road at time of drop off and pick up which poses a significant safety issue for children especially since the speed ramps either side of the school have been removed which is ludicrous!
South Harringay Primary SS40 & 41	Support	I wholly support this proposal and believe it will have a number of benefits including on safety and environmental effects.
South Harringay Primary SS40 & 41	Support	I wholly support this proposal to improve the safety of school pupils, parents/carers and staff. This will also encourage more walking to school and will have a positive impact on the environment. It will also be safer for pupils to walk to school by themselves when they are old enough and encourage use of scooters & bikes. Thank you
South Harringay Primary SS40 & 41	Support	I wholly support this proposal which will simultaneously make access to the school safer (less risk of hit and run incidents) and healthier (more walking and less fumes), and hopefully deter the use of the road as a shortcut by cars/vans that have no need to use the road itself.
South Harringay Primary SS40 & 41	Support	I would have liked to see extended hours beyond those proposed as this would cover before and after school activities too. Ideally for pollution to be reduced for the children, both Pemberton and Mattison would be residents only. A crossing at the passage would ensure additional safety. In addition when the road was resurfaced a speed bump just before the school crossing was removed, this needs to be reinstated as cars speed up right at the most crucial point that they should be driving slow.
South Harringay Primary SS40 & 41	Support	I would like air quality around the school to improve and create a healthier atmosphere for children. Also encourage walking and other forms of transportation
South Harringay Primary SS40 & 41	Support	Keep our kids safe and our air clean. Active travel in Haringey!
South Harringay Primary SS40 & 41	Support	Local
South Harringay Primary SS40 & 41	Support	Must go ahead. Traffic dangerous and polluting.
South Harringay Primary SS40 & 41	Support	My children attend the school and safety is the main concern
South Harringay Primary SS40 & 41	Support	
South Harringay Primary SS40 & 41	Support	
South Harringay Primary SS40 & 41	Support	No need for cars given the tiny catchment area
South Harringay Primary SS40 & 41	Support	No through traffic at school drop off/pick up hours?

South Harringay Primary SS40 & 41	Support	Our children already live in a polluted city. We want them to grow up here, but school streets would help clean the air and give them a healthier start in life. Please consider their lungs.
South Harringay Primary SS40 & 41	Support	Our children cross this road on way to/from school and this measure will make it much safer
South Harringay Primary SS40 & 41	Support	Please consider amending the times from and to: Kids go to School for Breakfast Club and sports starting at 8am. Also the junior school kids do not come out of school until 4.40pm.....so Restrictions need to be from 8 am - 4pm if possible I think to really make the roads safe.
South Harringay Primary SS40 & 41	Support	DUPLICATE Please consider the timings , kids go to Breakfast club and sports at 8am.....and the juniors school don't finish until 4.40pm. So kids will still be everywhere crossing the roads..... Restrictions need to be from 8 am - 4pm if possible please . For maximum safety
South Harringay Primary SS40 & 41	Support	Please extend to other nearby roads as many parents drop off children on parallel roads.
South Harringay Primary SS40 & 41	Support	Please extend to Warham road which is used as an alternative drop off point for many parents
South Harringay Primary SS40 & 41	Support	Restricting and reducing the level of pollution around the area is to be greatly supported and encouraged.
South Harringay Primary SS40 & 41	Support	Same reason I detailed for the other school street in Martinson road. Some drivers have no regard for the fact that there is a school on the street.
South Harringay Primary SS40 & 41	Support	The Ladder desperately needs less through motor traffic, particularly to ensure the safety of school students, and to encourage them to take active journeys to school.

South Harringay Primary SS40 & 41	Support	The School Street itself is fully supported but there are two serious issues that seemingly were not considered as evidenced by the terms of the proposal: (1) The South Harringay School is right on the Harringay Passage and thereby is less than 100 metres from the roads immediately north and south of the School Streets (Warham Road and Ducketts Road, respectively). Many motorists displaced by the School Streets traffic order will simply drop and collect their children on these streets--this feedback provider lives on the Harringay Passage in Warham Road and has observed this practice regularly already; and, (2) The exemption to the School Streets ban on Pemberton Road in particular should not just be limited to those residents of Pemberton road: It should be extended to those persons who live in Warham Road immediately to the north of Pemberton Road. This is because with the one way road system in the Harringay Ladder, restricting Pemberton Road means that residents of Warham Road coming southbound on Wightman Road would have to drive an extra half mile to access their street as they would have to go down to Duckett Road and then come back to Warham Road via Green Lanes. It is not possible to access Warham Road going southbound on Wightman Road on any of the roads immediately north of Warham Road - Seymour Road runs in the same one way direction as Warham Road; Hewitt Road doesn't allow for a right turn on to Green Lanes; Allison Road also runs one way to the west. Moreover, when heading southbound on Green Lanes one is not able to make a right turn into Warham Road. Hence Warham Road residents will be unintentionally punished by the School Streets initiative unless the Warham Road residents are granted an exemption from the programme as will be the residents of Pemberton Road.
South Harringay Primary SS40 & 41	Support	This is a brilliant idea and I fully support school traffic zones for safety and environmental reasons.
South Harringay Primary SS40 & 41	Support	This is a good idea for the safety and health of the school children.
South Harringay Primary SS40 & 41	Support	This is a much needed addition to increase safety and improve air quality
South Harringay Primary SS40 & 41	Support	This proposal is essential for child safety. The traffic at school drop off and pick up times is very dangerous
South Harringay Primary SS40 & 41	Support	Thus would make the environment safer and more pleasant
South Harringay Primary SS40 & 41	Support	Value school streets for their holistic approach to children's (and other school stakeholders) safety and quality of life
South Harringay Primary SS40 & 41	Support	Wholeheartedly support. I think the school streets should be expanded to Duckett Road and Warham Road as well to avoid displacement as the Haringey Passage allows access within about 50m. To be honest I think every street should have limited traffic on it.

South Harringay Primary SS40 & 41	Support	Yes
South Harringay Primary SS40 & 41	Support	
South Harringay Primary SS40 & 41	Support	
South Harringay Primary SS40 & 41	Support	
South Harringay Primary SS40 & 41	Support	
South Harringay Primary SS40 & 41	Support	
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South Harringay Primary SS40 & 41	Support	

South Harringay Primary SS40 & 41	Support	Very happy. However, why is the afternoon session so short? Normally they are 1 to 1.5 hours. Why is this one only 45 mins?
South Harringay Primary SS40 & 41	Support	Although I support this initiative, I would like LBH to consider Royal Mail and other deliveries who may have to drive on to the SS during restricted times to complete their work. I believe that Royal Mail at least should be given an exemption
South Harringay Primary SS40 & 41	Support	Ensure signage is clearly visible for approaching motorists - including in the adjoining streets, so that drivers don't accidentally turn in and get fined.
South Harringay Primary SS40 & 41	Support	Fully support this.
South Harringay Primary SS40 & 41	Support	Fully support. It will make a very positive difference.
South Harringay Primary SS40 & 41	Support	Great initiative. Please extend the time slots
South Harringay Primary SS40 & 41	Support	Hugely supportive of this proposal as a minimum to protect children from both RTAs and pollution. I wish this could be accompanied by reduced traffic flow on Warham Rd - which is already congested, dangerous and dirty.
South Harringay Primary SS40 & 41	Support	I support but strongly encourage allowance to be made for deliveries, builders and service calls. As residents we can drive our cars in but we cannot receive services. Please consider this
South Harringay Primary SS40 & 41	Support	I support the proposal in principle, but I encourage the council to increase the frequency of rubbish collections in surrounding roads. Children should not have to walk alongside dumped rubbish (a daily occurrence here); as it will detract from their enjoying the walks to school and might potentially discourage them.
South Harringay Primary SS40 & 41	Support	I've noticed fewer cars outside the schools these days; but it is still a good idea to reduce cars.
South Harringay Primary SS40 & 41	Support	Make Wightman Rd a "no through road" to stop rat running. No one - or least very few; adhere to the 20mph limit. and it makes it unsafe for pedestrians - including school children. the elderly and disabled. Thank you. Let's have a safe Haringey for all.
South Harringay Primary SS40 & 41	Support	Please take measures to avoid traffic displacement to neighbouring ladder roads including Warham. The roads already receive a lot of through traffic. Thanks
South Harringay Primary SS40 & 41	Support	Really strongly support this. Suggest you also use the cameras to monitor and ticket the HGVs which often use Pemberton Rd but should not.
South Harringay Primary SS40 & 41	Support	The most important thing to focus on in the initial states is communication. Once the SS system is in place you should put council staff at the entrance to the road for the first few days warning drivers that they are entering a SS, and explaining the consequences - and aims of the project. You should also consider a PCN amnesty for the first month or so, as this will ensure drivers get the message, but not the fine.

South Harringay Primary SS40 & 41	Support	There are 4 planters - 2 on each road. These should be given to the school - with an annual budget - to allow the school to take control and make use of when teaching children about growing plants and science; for KSI
South Harringay Primary SS40 & 41	Support	These measures as proposed, discriminate against people who can't afford a car. Taxis and minicabs should be able to access LTNs and SS - in which case the hours could be extended.
South Harringay Primary SS40 & 41	Support	Very happy not only for the children - but also it will reduce pollution form cars and lorries driving down our road in the mornings. I wish it could be 5 - 6 in the evenings too!
South Harringay Primary SS40 & 41	Support	We strongly support and endorse the plans. The roads are dangerous for pedestrians and children at the school.
South Harringay Primary SS40 & 41	Support	We strongly support this project. Please consider temporary exemptions for workmen's vehicles etc. for when building works are carried out. Thanks
South Harringay Primary SS40 & 41	Support	We'd support a longer SS period in the afternoon
South Harringay Primary SS40 & 41	Support	Why has this taken so long? Anything to reduce traffic on the ladder roads will be welcome.

South Harringay Primary SS40 & 41	Object	1) The Scheme will be dangerous: the attached shows the RTAs involving children near the roads since 1998. You will note the vast majority happened at junctions. The confusion caused to drivers by a scheme with variable restrictions and minimal signage will result in attempts to take evasive actions to avoid £120 fines. Evasive actions are often more dangerous manoeuvres, and confused drivers make mistakes, which can also be dangerous. Considering Pemberton and Mattison Roads are relatively narrow, one way roads and have busy Wightman Road and Green Lanes at either end, I'm concerned the result will be very dangerous junctions, and particularly dangerous at a time when the junctions are busy with children coming school. The danger will be increased because of the bus stop at the bottom of Mattison Road. The School Streets plans will make the junctions far more dangerous because the planned signage - if it works at all - will encourage drivers to make last minute diversions from their route. The plans for these roads will significantly increase risk of collisions and injuries, and I'm certain the School Streets scheme will be a factor in the collisions that result. 2) The scheme fails to consider the decision in Bladon v Westminster City Council, especially regarding unusual and experimental traffic schemes. The School Streets schemes are unusual and experimental. The just-over-statutory-minimum approach is obviously not working otherwise there wouldn't be so many fines. Further the proposed School Streets signs are insufficient in terms of size of font and graphics, have far too much detail to be read in a manner that permits careful driving, - drivers will have to stop and read them to understand the detail- are extremely confusing particularly regarding when they apply, require a knowledge of numerous school term dates, and are too small in size, too insufficient in number, placed around too much street clutter, may be hidden by buses, and placed in the wrong locations, and fail to use painted warnings on the roads, so drivers are likely to fail to notice them. This will be dangerous particularly at the junctions of both Wightman Road and Green Lanes, and will encourage drivers to take evasive manoeuvres that will cause danger to pedestrians and other motor vehicles as well as congestion. 3) Every fine issued, and ever pound collected by the authority on other School Streets is a measure of the failure of School Streets in their purported objective to stop vehicles travelling up the roads concerned. The true objective of the council's plans is to raise revenue. 70% of penalties were from vehicles not registered in Haringey. That stat alone shows that statutory minimum signage is not working. 4) The consultation process has been biased and insufficient. It has been focused on parents attending the school - the vast majority are not affected by the scheme. The self-employed delivery drivers have not been notified about the scheme and are unaware of the plans. The delivery companies are not employers of the delivery drivers, and they do not represent or take responsibility for the self-employed delivery drivers. This is a significant failure of the consultation process. Unions such as the GMB, The App Drivers and Couriers Union and individual self-employed delivery drivers should have been consulted. 5) The case for the reduction of pollution is not made out by the Council's research. The assessment of the reduction in pollution was done during the pandemic when traffic was vastly reduced. Moreover, the congestion that will be caused by the scheme will increase pollution on other roads nearby, so the scheme will be entirely counter productive. It is notable that low emission vehicles are not given any exemptions, so the scheme does not promote the reduction of pollution. 6) Deliveries will fail to be delivered to residents, either going to collection hubs or not being delivered at all. This will increase the number of journeys for residents - particularly for larger items - thus impacting the use of the roads.

		7) The local economy will be harmed, as fewer people will be able to work from home as they cannot rely on deliveries, and the delivery economy will be significantly impacted, which will encourage more road journeys to be made by residents. 8) The scheme is contrary to data protection legislation. It fails to establish the lawful basis of the collection and processing of residents data, particularly when another route to exercising the scheme, such as using lollipop sign operators, would achieve a similar result in a less blunt manner. Haringey have not explained the lawful basis for collecting and processing residents' car registrations, nor that a camera system is required, as restricting traffic during school hours could reasonably be achieved in a less intrusive way - such as employing lollipop traffic control staff.
South Harringay Primary SS40 & 41	Object	As a resident of xxb Wightman Road (opposite the end of Mattison Road and Pemberton Road on the opposite side) the proposals have not adequately considered the function of a one way traffic system that is in place in the ladder. My partner and I RELY on Mattison and Pemberton to safely unload our small toddler from our car given the dangers associated with traffic on Wightman Road. If this order is put in place, we would not adequately be able to park our permitted car in the bays safest for us - therefore this proposal puts us at adverse danger and let that be clear given the distance from the school to the end of Wightman Road - I cannot stress highly enough that the red line MUST be extended to properties that surround these two streets as my resident permit that I PAY FOR in GLA CPZ means these streets are safest for my family. This currently is a short sighted solution that does not consider the full impact of a one way street system and neighbouring properties.
South Harringay Primary SS40 & 41	Object	Good evening, I write to support the objection I have made on the consultation portal as I want this to be heard. As a resident of xxb Wightman Road (directly opposite both potential SS zones) I believe the proposals poorly consider the impact of a one way traffic system that exists on the ladder at present. My partner and I use both Mattison and Pemberton Road to SAFELY get our small toddler out of the car as Wightman Road is often busy to the point of dangerous, let alone speeding traffic. If the red line exclusion zone is not adequately extended to properties that are directly impacted by this i.e. mine, it will impact our safety significantly. The distance between the school entrance and exit is significant to the end of the street and therefore the impact is negligible in my opinion on safety, and I say that as a father. I wholeheartedly believe your system is flawed at present and the exemption boundary MUST be reconsidered. Business. London EC1V
South Harringay Primary SS40 & 41	Object	I'm concerned there seems to be no provision for residents to authorise deliveries, tradespeople or guests during operational hours. Is that correct? Can a penalty fine be retracted if a resident confirmed the driver was a genuine visitor?

South Harringay Primary SS40 & 41	Object	I feel the school street is unnecessary - there is not a problem with additional traffic in the mornings or afternoons. Furthermore it will place an unacceptable loss of access for authorised deliveries and visitors during operational hours. If approved, please can there be a way that residents can authorise exemption for deliveries and guests?
South Harringay Primary SS40 & 41	Object	I live in the road and see no issues around traffic at any time regardless of school opening and closing times. I have never seen any evidence of traffic incidents in the road so would like to see why safety is a factor. Similarly by closing the road there is likely to be more traffic, pollution and safety issues caused at either end of the road in Wightman Road and green lanes during school drop off time. How will this be mitigated? This is likely to cause more safety and congestion issues than it solves. In addition there will be: • More restrictions placed on residents • More admin & form filling for residents • Disruption, denial of service & fines caused to Friends & Family Visitors, Deliveries, Amazon/Deliveroo, Uber & Taxis, Carers, cleaners & home help If safety was truly the priority, far more effective, cheaper & respectful ways can achieve it through: • Temporary removable barriers • Deploying lollipop sign personnel • Civil Enforcement Officers I see little to no evidence of the problems this is trying to solve and without that I see this as little more than a money making scheme that will cause more detriment to the residents of the road than it would help.
South Harringay Primary SS40 & 41	Object	Object to the use of cameras to enforce with automatic PCNs. 1) If this is not also income generating venture then physical barriers e.g mobile flower troughs could be used instead of cameras - this will prevent entry to the designated roads for the required time. These can be moved by street enforcement officers. 2) What about deliveries ? Will these companies be fined? 3) Knock on consequences for other ladder roads 4) There should be an initial grace period and also if first time offence - any fines should be waived as driver will be unaware - and reading the plethora of signs at these junctions is dangerous.
South Harringay Primary SS40 & 41	Object	Proposed changes are wholly unnecessary. Safety of school children is already high as most of them walk to and from school along existing pedestrian routes with designated crossings and high visibility whilst under adult supervision. Restrictions would limit accessibility for residents with reduced mobility and reliance on carers, which is the far greater need in this scenario.
South Harringay Primary SS40 & 41	Object	There are ongoing concerns about high cut through traffic on Warham Rd. Traffic volume, noise cause disturbance, increased pollution as well as cracks to our homes. If Mattison Rd is closed drivers will seek alternative routes and as Warham is the next Rd along offering routes from Green Lanes to Wightman, it means Warham Rd residents will have to deal with the impact of increased volume of traffic. We have a very small number of pupils at South Harringay School and we're being asked to make even more personal sacrifices with no gains for the residents of Warham Rd

South Harringay Primary SS40 & 41	Object	There is already a large amount of traffic within the area due to the LTNs, this is simply going to concentrate the in a single area which isn't fair on other residents. The traffic on Pemberton/ Mattison road isn't high in my opinion to implement the rule. Nearly all the drivers I encounter when crossing are pleasant and understanding when I'm walking with my child to school.
South Harringay Primary SS40 & 41	Object	Won't improve anything. There will be more traffic on the other ladder roads so what is the point? Actually it might be even worse because there will be more traffic on the other roads where children also live, and they also walk to the school from there. Or you thought children only live on Mattison Road and Pemberton Road? Have any of you saw the crossings on the other ladder roads? Bushes/trees blocking the view. If you want safer environment for children maybe you should start there. What about permits for residents who lives on Wightman Road, just end of Mattison Road? I am not talking about driving through Mattison Road but to find a space on a ladder road to park. Since you changed the road layout on Wightman Road it's very difficult to find a space and have to use the ladder road(s) to park.
South Harringay Primary SS40 & 41	Object	DUPLICATE Won't improve anything. There will be more traffic on the other ladder roads so what is the point? Actually it might be even worse because there will be more traffic on the other roads where children also live and they also walk to the school from there. Or you thought children only live on Mattison Road and Pemberton Road? Have any of you saw the crossings on the other ladder roads? Bushes/trees blocking the view. If you want safer environment for children maybe you should start there. What about permits for residents who lives on Wightman Road, just end of Mattison Road/Pemberton Road? I am not talking about driving through Mattison Road/Pemberton Road but to find a space on a ladder road to park. Since you changed the road layout on Wightman Road it's very difficult to find a space and have to use the ladder road(s) to park.
South Harringay Primary SS40 & 41	Object	
South Harringay Primary SS40 & 41	Object	
South Harringay Primary SS40 & 41	Object	
South Harringay Primary SS40 & 41	Object	Don't do this. I will not be able to go to work, as I do shift work at different times. I strongly object to this SS
South Harringay Primary SS40 & 41	Object	Expand the zone of permit-eligible houses to include Warham Rd. Warham rd. traffic will otherwise be funnelled through Duckett or Hewitt roads. I'm all for a school zone but this really screw us the residents of Warham Rd, as not only will we experience more traffic (because of SS40), but it will also mean that residents are funnelled through other local roads.

South Harringay Primary SS40 & 41	Object	Stop trying to put up more cameras - and stop fining the residents. Stop creating more of these crackpot schemes - I will never vote Labour again.
South Harringay Primary SS40 & 41	Object	The SS is not necessary. There are no traffic problems in the mornings or afternoons. If this is approved, there MUST be a way that residents can have deliveries and visitors at their houses.
South Harringay Primary SS40 & 41	Object	This is just another revenue-raising scheme. It will simply displace traffic to other roads and create more danger by forcing children and parents into unsafe situations
South Harringay Primary SS40 & 41	Object	This will make parking outside my house even more difficult than it is now. It will also make it more difficult for residents of Warham Rd to access their houses when coming form Wightman Road. Surely there must be a more holistic approach to diverting traffic away from the area; as Wightman and Warham roads are very bad traffic cut through routes already.
South Harringay Primary SS40 & 41	Object	Warham Rd has a high volume of cut-through traffic. If Mattison Rd is closed, it will impact adversely on Warham Rd., because traffic going from Green Lanes to Wightman Rd will use Warham instead. Just sort out the Warham problem (which has been going on for years), and only then put in new measures.
South Harringay Primary SS40 & 41	Object	Will cause more traffic in the neighbouring roads. This scheme is NOT NEEDED
South Harringay Primary SS40 & 41	Object	You the politicians just want Money Money Money Money!
South Harringay Primary SS40 & 41	Object	Your traffic orders need to be reviewed in regard to tradespeople, couriers, and delivery drivers providing services to residents of Mattison Road. (Work from home is problematic with the SS restriction).
South Harringay Primary SS40 & 41	Other view	Nearly all the families walk to the school. We go up and down the passage every day, and there is an issue there in terms of safety (junkies smoking and selling) and state of the passage (dump and dog poo). I do not think we have a traffic issue on these roads. It will only cause confusion on green lanes and Whitman. I would use the resources to improve the passage, honestly.
South Harringay Primary SS40 & 41	Other view	Perhaps consider not housing drunk and violent people so close to the school. Just a thought!!!!
South Harringay Primary SS40 & 41	Other view	I'm not against the idea in principal as long as exemptions for driving include those who live on nearby streets. As you know, parking here is difficult and I, along with many others, frequently need to drive and park on the next road over (Pemberton, Duckett). So, anyone living on Wightman between nos.55 and 135 needs including.
South Harringay Primary SS40 & 41	Other view	Please also make Pemberton a school street. It has school entrances, and many cars use it as a cut through down to Green Lanes. Both Mattisson and Pemberton should be SS otherwise the scheme has no benefits. If it's just Mattisson Rd., then give the exemption to Pemberton Rd residents too.
South Harringay Primary SS40 & 41	Other view	Why not enforce using existing parking restrictions? Deliveries / services, and workmen will need access during the operating periods and residents should be able to authorise this easily and quickly. Displacement parkign is a knock on effect for nearby roads. Cars will park on these roads - incl Dockets. The cost is ludicrously expensive, and far more urgent work should be prioritised - including the disgraceful state of the pavement on Mattison Rd.

South Harringay Primary SS40 & 41	Support	As a parent at the school I'd like my child to have as clean an environment as possible
South Harringay Primary SS40 & 41	Support	As a parent of a South Harringay School student, this proposal makes sense to me to enhance the safety/wellbeing of our students, both from a road safety perspective as well as air quality. Investing in their wellbeing now pays off in the future for all of society.
South Harringay Primary SS40 & 41	Support	As both a homeowner of 3 properties on Pemberton Road, and parent of children going at South Harringay School, I fully support the scheme subject to adequate exemptions being granted to residents.
South Harringay Primary SS40 & 41	Support	I fully support the schools street proposals, which are proportionate and will be effective in promoting safer active travel to Sorth Harringay. My daughter could start at this school in the next year, and I would be very pleased if these plans are in place by then.
South Harringay Primary SS40 & 41	Support	I support this initiative. I am responding as my children attend South Harringay School. However, ongoing review is needed on how much this impacts adjacent streets and/or whether this pushes the problem of parents dropping their kids using cars into the adjacent streets.
South Harringay Primary SS40 & 41	Support	I support this school street as my daughter attends this school and I have seen firsthand how some people with cars do not car and carry on driving instead of stopping to allow the kids to get to school or home. It would make me have peace of mind sending my child to school knowing she can cross the road safely.
South Harringay Primary SS40 & 41	Support	My children attend/ed this school. It is vital to have this scheme in place. It is coming far too late as my daughter has left the school. It is vital to protect the children from traffic fumes and the dangers in road crossing that the huge amount of traffic bring to the area. Pemberton Road has been used as a Green Lanes cut through for years and there is often significant traffic in the afternoon bring huge jams and awful pollution. There is also a ridiculous issue with parents engine idling and blocking fire exits.
South Harringay Primary SS40 & 41	Support	My children walk to this school. Walking along the Harringay Passage to schools as safe as possible should be a priority - I think there are nearly a thousand children attending North and South Harringay schools and they all need a safe and healthy route to school. Sometimes cars park on the zigzags or they go by super-fast when children are waiting to cross. It is easy to see how a child could be hit. As a separate note, would it make sense for all ladder roads to have a pedestrian crossing at the passage?
South Harringay Primary SS40 & 41	Support	My son attends the school and any reduction in traffic to improve safety and reduce pollution would be welcomed.
South Harringay Primary SS40 & 41	Support	Strongly in favour of this - I live locally and keen on allowing my daughter to walk to school, but concerned about letting her do so given the busy rat run traffic.
South Harringay Primary SS40 & 41	Support	The road is very busy and unsafe for my children who are at South Harringay School. Especially when thinking about letting my daughter walk home I worry about how drivers just want to get through the street (it is used as a rat run) and do not give way for pedestrians.
South Harringay Primary SS40 & 41	Support	Cars often park illegally, on yellow zigzags. It becomes dangerous for our children to get into school with traffic moving off and not obeying traffic laws.

South Harringay Primary SS40 & 41	Support	I support the proposal but would recommend further consideration on the timings. School ends at 3:30, and there is occasionally a delay. The afternoon window should be extended, or it should start later. Additionally, there are before and after school clubs, usually 8am start and 4:30 finish. Children who may be accustomed to the reduced traffic during School Streets time may be at particular / increased risk if the hours do not accommodate these clubs, which are popular.
South Harringay Primary SS40 & 41	Support	I think the streets around school should be closed around drop off and pick up times for safety. The vast majority of families walk to school or take public transport. Visibility can be difficult, because of large numbers of people and cars, and young children especially are at risk. Also pollution is a big problem and children should be shielded from this at school.
South Harringay Primary SS40 & 41	Support	Our children have a right to clean air, and we have a duty to protect them from the harmful effects of pollution, regardless of the inconvenience to any and all drivers affected by the changes.
Stroud Green SS39	Support	Great idea but how about extending the hours?
Stroud Green SS39	Support	I feel it's very important to have a school street for Stroud Green to ensure the safety of local children travelling to and from school
Stroud Green SS39	Support	I fully support the implementation of a school street system near Stroud Green school as there have been multiple near misses with children nearly being hit by speeding drivers.
Stroud Green SS39	Support	I welcome this pause in traffic surrounding the school & nursery however my family does not believe this to be sufficient to protect the health of the children. Unfortunately the school & nursery are literally surrounded by the roads with no green buffering zone whatsoever. Ideally the surrounding streets should be entirely pedestrianised to protect the children's lungs & health from future chronic diseases & cancers. As recognised by the WHO, air pollution is now the biggest killer worldwide. We need to act now! Please consider closing the roads to traffic, alternative incremental options to improve current proposals would be to close the roads during children's outdoor/break hours (in addition to drop off/pick up), or better still for the entire duration of school hours. They are 3 tiny minor streets with loads of alternative optional routes for cars, closing them is insignificant compared to the benefit for children's health that would result. Soo if this in addition to significantly decreasing risks from RTA & encouraging active travel. Thank you for tackling this! 🙏
Stroud Green SS39	Support	My children cycle to school, this will massively improve their safety. There is too much school related traffic in the morning and afternoons.

Stroud Green SS39	Support	Subject: Supporting School Streets Proposal and Urging Inclusion of Scarborough Road and Carlisle Road for Enhanced Safety I am writing to express my support for the School Streets proposal aimed at improving safety and reducing congestion around our schools. The initiative's focus on prioritising pedestrians and cyclists during school hours is commendable and aligns with the community's need for safer environments for our children. However, I urge the council to consider extending the scope of this initiative to include Scarborough Road and Carlisle Road, specifically addressing the pressing safety concerns associated with these areas. The inclusion of these roads is crucial due to their significance as access routes, particularly utilising the art block side entrance to Parkland Walk. Failure to incorporate Scarborough Road and Carlisle Road into the School Streets plan could result in increased traffic congestion and pose substantial risks to the safety of our children. Parents relying on cars may resort to parking on these roads to enable their children to access the art block route, thereby escalating the dangers of accidents, especially for younger children manoeuvring between parked vehicles. Scarborough and Carlisle Roads are both dead-end streets. Navigating these narrow streets, particularly with Scarborough Road serving as an access route, significantly amplifies potential risks. It is imperative to incorporate these roads into the School Streets initiative. Doing so will ensure a safer passage for children accessing the art block side entrance to Parkland Walk. This inclusion will help mitigate the hazards associated with congested and confined spaces. I firmly believe that by extending the School Streets program to include Scarborough Road and Carlisle Road, we can reinforce the safety measures around our schools comprehensively. This extension aligns with the core objectives of the initiative, enhancing the safety and well-being of our children while promoting alternative, active modes of transportation. I urge the council to consider these additional measures to fortify the overall effectiveness of the School Streets proposal and safeguard the welfare of our young residents.
Stroud Green SS39	Support	Support
Stroud Green SS39	Support	
Stroud Green SS39	Support	
Stroud Green SS39	Support	
Stroud Green SS39	Support	
Stroud Green SS39	Support	
Stroud Green SS39	Support	A very good idea - I hope it works. 1. Please ensure signs are very clear so that people know about the scheme. 2. Take the opportunity to redesign the contra-flow cycle lane, as it puts car drivers and cyclists into conflict. Cyclists go too fast and are at real risk of injury from car doors opening as they go past.. I don't own a car, so have no personal interest.

Stroud Green SS39	Support	Additional secure bike hangars and street secure 'D' hoops needed. Action is needed as well as vigilance, with the daily drug dealing on the street. You also need to be aware of the extend of traffic displacement and congestion to surrounding streets
Stroud Green SS39	Support	Great idea. I would support any similar ideas that would reduce the local traffic and pollution.
Stroud Green SS39	Support	I support but with some reservations. As my road is one-way, it means I cannot have any deliveries during restricted times - including Royal Mail? The access issue could impact the vulnerable and those with mobility issues. I assume also that taxis would not have access.
Stroud Green SS39	Support	I would love my daughter to cycle to school but all children there are 5 - 10 and large cars are parked illegally in the middle of the road, so it's not safe for her to have to cycle around them.
Stroud Green SS39	Support	I'd like to see more of this to make it easier and safer for children to walk and cycle to school; and also to reduce the impact of air pollution during the school day. It is important to make structural changes to discourage children being driven to school; as that is unnecessary and not good for their health.
Stroud Green SS39	Support	It would be good to have a safe crossing on Woodstock Rd for the school children going to the Park.
Stroud Green SS39	Support	Please reject the motoring lobby objection to this wonderful proposal. We all must transition away from personal car use to active travel and public transport - for the benefit of ALL
Stroud Green SS39	Support	Some provision should be made for when someone needs a taxi urgently during the restricted hours
Stroud Green SS39	Support	The road in between the pub and the school (the junction of Perth and Ennis roads used to be two-way but is now one-way) now has two exits with an island. The section between the pub and the island should be pedestrianised so it's safer for children crossing the road and customers exiting the pub
Stroud Green SS39	Support	This doesn't go far enough. The area should be LTN.
Stroud Green SS39	Support	Very Pro! / / / Please extend the enforcement hours to 8 - 9.30 and 2.45 - 5pm
Stroud Green SS39	Support	We support any restrictions of car use in the area which enables more space for cycling and walking
Stroud Green SS39	Object	
Stroud Green SS39	Object	Dear Sir/Madam, I object to this proposal on the grounds that Ennis Road and Woodstock Road are both quiet roads and there are no safety problems for students at Stroud Green School. The existing situation is entirely appropriate and there is no need to impose proposed plan SS39. It is not going to enhance the safety of students and is a waste of council money and resources. Ennis Road London N4

Stroud Green SS39	Object	Dear Sirs, Re School Street SS39 Stroud Green Consultation As a resident of Woodstock Road I am writing to register my strong objection to the proposed School Street SS39, for the following reasons:- 1. The difficulties it will cause residents for receiving deliveries, access to taxis and having trades people arrive during the proposed restricted hours. 2. That it will have minimal effect on emissions and air quality, especially for the school children who are outside beside the road for a much longer period during playtimes (not during restricted hours) than during school arrival and collections. 3. That your signage scheme is discrete and will be missed by many motorists, so many will be fined and will perceive this scheme entirely as a money-making exercise by yourselves. 4. That it does very little to prevent the constant rat-running of traffic from Stroud Green Road and Upper Tollington Park, the primary cause of the issues you wish to resolve. I propose instead that you block the flow of motorised vehicles between Perth Road and Oxford Road, so creating two cul-de-sacs of Woodstock Road/Perth Road and Oxford Road/Florence Road. This would vastly reduce the traffic on the street (making a much safer environment for the school children) whilst also improving the environment for the residents of the area without inconveniencing them. I request that you do not go ahead with the SS39 plan and instead consider my above proposal.
Stroud Green SS39	Object	I do not agree with the proposal as I don't see the point really as how much pollution is really being caused stopping a few cars coming up a couple of roads it will just cause more pollution on the main stroud green road. Also there are students at the school coming from as far as Edmonton as have been placed in temporary accommodation and do not want to disrupt kids education by taking them out so have to drive and obviously will not be able to park anywhere around as it is not free parking. Also consider people with disabilities who have to travel by transport to get to school and with illnesses who don't want to risk getting germs from on public transport. This really is just a money making scheme for motorists from my point of view to make motorists pay for more fines. I hope you will consider my views whilst making your decision. Thankyou
Stroud Green SS39	Object	I do not find the traffic to be significant or disruptive and am concerned that this will just have a knock on effect or pushing the traffic and congestion elsewhere around Stroud Green and disturbing local deliveries .

Stroud Green SS39	Object	In my opinion (as a resident who lives on Woodstock Road near to the school), the negatives of this proposed School Street outweigh the positives. I am not in favour of the proposal. With the existing one way systems on Florence Road, Oxford Road and Ennis Road, the proposed School Street roads are already fairly quiet much of the time, and even during school run times the traffic issues are not excessive. Many parents/guardians will still drive their children to school, and I believe these proposals would simply force more traffic onto the sections of Upper Tollington Park and Stroud Green Road that surround the proposed School Streets (as well as other nearby streets). If it has not been done already, I would encourage the council to monitor the existing traffic on these sections of Upper Tollington Park and Stroud Green Road during 08:15-09:15 am and 2:45-3:45 pm, and consider if you feel that these roads have capacity to absorb the traffic increase that this School Street would bring during those times. As a local who has to drive for work, I see these sections of road jammed with traffic at all times of day, let alone the busier times that these proposals would affect. So I question if the surrounding roads do have the capacity to take the extra traffic. Rolling out LTNs and School Streets both locally and all across London seems to be in fashion at the moment. However, the effect of these schemes over the last 2 years has been crippling on local people's ability to get around (I am a key worker with a van – I don't choose to drive, I have to drive). If these schemes continue to be rolled out at the pace they have been, I believe that a point will soon be reached where the main roads simply cannot accept any more traffic being diverted from side roads, and the main roads will cease to be viable ways to get anywhere. I don't feel that the leaflet presented to local residents gave much of a balanced position with regards to potential negatives of the proposed scheme. Also, some of the positive points put forward have significant counter arguments. For example, on the pollution issue – the area is now in the ULEZ zone, we are strongly trending towards more electric/hybrid vehicles on the road, and emission standards for modern petrol and diesel vehicles are much improved compared to the past. Aside from the fact that there is a school on Woodstock Road, I would be keen to know what is driving the push for this particular School Street. I feel that this decision needs to be data driven, and that the council should be able to provide supporting data if it is pushed through. By this I mean data to support the proposed benefits the council put forward in its leaflet with regard to: Air quality, safety, congestion, and parking problems. How do the current numbers for each of these compare to accepted standards/limits, and how much of an improvement would a School Street be expected to bring? I am not against all School Streets and LTNs. However, I think that careful consideration needs to be given to the appropriateness of each. I am sorry to say that for the reasons I mention above (and many more), I do not believe that this particular one would be beneficial. I took a look through the information posted at https://shorturl.at.cjrxX. In the 14 pages of report plus 134 pages of appendix material A-D, I did not see much in the way of data to support the need for this particular school street. The opinions collected from questionnaires are marginally more in favour of the school street than against, but is this not to be expected when the council sends consultation leaflets through peoples doors that are so biased towards the perceived benefits and mention nothing of potential drawbacks? Indeed, given that that the amount of votes

		against is so high despite these biased leaflets – do you not feel that this tells you something very important? On page 37 of appendix A I see some N02 data from 2016. But this data is old, N02 levels have been trending downward since this time, and there is no context given in terms of what benefit a school street may bring to N02 levels. On page 59 of appendix A there are a few lines of text about a Sustrans Engagement board that was run on 07 December. However, I assume the wording on the engagement board was similarly biased as the consultation leaflets posted through our doors, and even still I noted that there were some concerns from people about pushing problems into other areas (which are very valid concerns). So where is the real data that justifies the need for this specific school street please? And by real data - I mean data that is not just people's opinions? Where is the data on traffic, safety, and pollution? Where is the data to show what consideration has been given to how local roads will be affected by the additional traffic that will be pushed onto them? The information that has been presented so far in the above near 150 pages of report is, in my opinion: Weak, vague, incomplete, and skewed by biased information that has been presented to the public. It is simply not sufficient to justify the implementation of this particular school street.
Stroud Green SS39	Object	It isn't necessary, if it's not broken it doesn't require fixing. My son attends the school and there has been no issue with getting the children securely in or out of the school
Stroud Green SS39	Object	This is so inconsiderate as I use these roads every day to get to work and drop off my children at school. We will now be running late every day and will be very difficult to get all kids to different schools on time

Stroud Green SS39	Object	Subject: Concerns Regarding School Street Implementation on Ennis Road and Perth Road I hope this email finds you well. I am writing to express my strong opposition to the proposed implementation of school streets on Ennis Road and Perth Road. While I understand the intention behind this initiative, I believe it would have several negative consequences and may not be the most effective solution for ensuring the safety of our students. First and foremost, implementing school streets on Ennis Road and Perth Road would significantly disrupt the daily lives of residents and commuters in the area. These roads serve as vital arteries for local traffic, and restricting access during certain hours would create unnecessary congestion and inconvenience for residents, businesses, and visitors. It is important to consider the broader impact on the community before implementing such measures. Furthermore, I would like to bring to your attention an additional concern specific to the residents of Ennis Road and Perth Road. Many of us rely on parking permits that restrict us to these streets. Implementing school streets would effectively eliminate our ability to avoid the restrictions during the designated hours. This would create a significant inconvenience for residents who need to park their vehicles in the vicinity of their homes or businesses. Additionally, the proposed school streets may not effectively address the safety concerns they aim to address. While reducing traffic near schools is a valid goal, it is crucial to explore alternative approaches that do not compromise the convenience and mobility of the entire neighbourhood. Enhancing existing traffic calming measures, such as speed bumps, crosswalks, and increased signage, could be more efficient and less disruptive to the community. Moreover, implementing school streets without comprehensive planning and consultation with all stakeholders could lead to unintended consequences. It is essential to involve local residents, businesses, parents, and relevant community organizations in the decision-making process. Their input and insights can provide valuable perspectives and help identify alternative solutions that prioritize safety while minimizing disruption. I would like to suggest exploring alternative strategies to enhance student safety in the vicinity of schools. For instance, increasing the presence of crossing guards during peak school hours, promoting educational campaigns on road safety, and improving infrastructure such as sidewalks and bike lanes could be more effective in creating a safer environment for our students. In conclusion, I respectfully urge you to reconsider the implementation of school streets on Ennis Road and Perth Road. While the safety of our children is of utmost importance, we should strive to find solutions that do not disproportionately inconvenience the wider community. By engaging in a more inclusive and comprehensive planning process, we can work towards a safer environment for everyone without compromising the daily lives of residents and commuters. Thank you for considering my concerns. I would appreciate the opportunity to discuss this matter further and contribute to finding a solution that benefits all stakeholders. Please feel free to reach out to me at your convenience. Stroud Green Road N4

Stroud Green SS39	Object	DUPLICATE I am writing to object to the proposed changes outlined by the council for school roads. Whilst I understand the benefits that a low traffic and clean air zone would bring to the immediate area outside of the school. Ultimately, this is a wider, regional problem, which is being tackled by Tfl and the Mayor for London with the expansion of the ULEZ zone. These proposed changes by the council to restrict the movement of cars outside the school during certain times of the day will only compound traffic in the local area and move the problem elsewhere, whilst complicating travel for many across the school and borough. Additionally, Staff at the school are concerned about the impact to children's punctuality and attendance - we have many children living and travelling into school, from outside the borough and these changes would impact on them the most. Due to a shortfall in Government funding and Haringey council rehousing and moving many families on social housing to cheaper, more affordable housing outside of the borough - this has led to more families with ties to the school having to travel in. Ultimately, a reduction in the numbers of children attending school would compound these changes and further escalate recruitment and funding problems across the school in the near future. With numbers on roll potentially falling and recruitment becoming increasingly acute as a consequence, will Haringey Council step in to fund any short fall or take responsibility for any future redundancies because of their actions to implement school roads across the borough? Finally, being an active rider, I approached the council to improve the cycle to work scheme, as well as open the scheme up to include electric bikes. I was hoping to purchase an electric cargo bike to transport my two daughters to school and from school, but the council cannot / will not improve their package - this could result in me having to purchase a car, thus adding to the pollution of the local area. The council should be actively supporting alternative means of travel and helping staff to make the switch from car to bike. Before the Council implements such actions, they should really engage with the local community, teaching staff from all schools and have drop in centres at each school site with a range of translators to communicate and engage with non-native English speakers about these changes and not rely upon a notifications on lampposts which could go amiss. I feel that this process has not been truly representative to all nor accessible - more should have been done to engage with all in the wider community.
Stroud Green SS39	Object	Until recently, I lived in Woodstock Road and traffic was never an issue, so I don't see the need to make this a school street. We saw our old neighbours last week who are of the same opinion. We take our daughter to Stroud Green School every day on foot but every other Thursday her grandparents, who have accessibility issues, come to pick her up by car, so this would make it incredibly difficult for them to see their granddaughter and support us with childcare. I would much prefer that the council invested their time in dealing with the antisocial behaviour and drugs problems that are regularly occurring on both Woodstock and Ennis Road, which frankly are much more disturbing for my child to see than a couple of parked cars.
Stroud Green SS39	Object	
Stroud Green SS39	Object	

Stroud Green SS39	Object	I suggest you abandon this project because the neighbouring roads are not busy and do not pose a significant safety risk to children. You are just going to waste money, and the idea that childhood obesity will be helped by this scheme is just not credible; because any additional exercise will be minimal with no impact on health.
Stroud Green SS39	Object	In theory I would support it, but - as a resident - I feel there is not the evidence needed to indicate there is a problem. I worry that the road / parking rules are already very complicated, and drivers will inadvertently receive PCNs or not be aware. You may get lots of children dropped off near busy junctions instead. Will the parking tickets revenue be invested in the streets impacted by the SS?
Stroud Green SS39	Object	Inappropriate for Ennis Rd. Businesses will suffer. There are no traffic problems in the road and it's quite safe to walk. This consultation is a waste of time.
Stroud Green SS39	Object	My suggestion i snot to go ahead with this SS. The surrounding roads are not that busy, and the school is not on a main road. What do you advise delivery drivers and other service calls to do when the surrounding areas are closed?
Stroud Green SS39	Object	Perth Rd used to be a fast through road for cars avoiding jams on Stroud Green / Seven Sisters. Residents-only parking on this road has made a great positive difference. The main problem now is the cars dropping off children at school. Otherwise, the road is is now quiet with little traffic. Come and check it out. I am now old and have lived here for around 30 years.
Stroud Green SS39	Object	Please leave us alone. This constant coming up with unnecessary road enforcements to make money off people. This will affect deliveries and services as well as personal matters.
Stroud Green SS39	Object	PLEASE recognise the need for residents to have full 24/7 access by visitors, tradespeople, deliveries, carers, taxis etc. PLEASE DON'T make our lives more difficult, and please don't penalise residents.
Stroud Green SS39	Object	School periods don't pose any problem for us as long-time residents. No restrictions are needed
Stroud Green SS39	Object	Simply unnecessary
Stroud Green SS39	Object	The current CPZ parkign works very well and in my view, no further restrictions are needed. The road is one-way only and there is very little traffic. We have not seen any increase in traffic at school start and finish times
Stroud Green SS39	Object	There is no traffic issue in this area. The SS will just trap and fine unsuspecting motorists
Stroud Green SS39	Object	This will cause more traffic displacement congestion which will lead to increased emissions. The area already has too many roadworks, so when this starts it will be chaos.
Stroud Green SS39	Object	This will displace school traffic to other roads thereby increasing congestion there. There is also no provision to suspend SS operating hours during school and public holidays. My view is that the same traffic build ups will be shifted to different roads and that residents will be fined on days when no enforcement is required.
Stroud Green SS39	Object	ve to locals and services. This is not a busy road
Stroud Green SS39	Object	You are just pushing this through, and I don't believe you have any intention of taking residents' views into account. The same way you went ahead with the extension of concerts in Finsbury Park without any public consultation. This SS proposal is just an income generation exercise for Haringey: a sickening, woke, useless council

Stroud Green SS39	Other view	Please excuse me: I realise my drafting was ambiguous and have made two corrections marked ** below. Dear team, Please excuse me emailing from work, I'm writing in a personal capacity. I'm a long-term Perth Road resident who cycles to work every day and have two children who go to Stroud Green primary school. I object to proposed Order 2023-T10 and have two questions/suggestions. Objection I would prefer tradespeople to be able to visit and/or make deliveries without restriction, and am concerned that if access to my street is hindered I will not be able to get reliable services, and have to make more journeys myself. Given a) extensive and growing central and local government policy measures to reduce car use, such that people are **only** using cars and vans **when** they have to, and b) your tight resources, restrictions must have clear benefits. In this particular context I think the potential benefits are marginal at best and counterproductive at worst: * Road safety: these are very wide streets with excellent visibility, with a well-designed crossing on Perth Road. Removing cars at school times would make a marginal difference to general safety and zero difference to our decision for the kids to cycle to secondary schools because other roads will always be more challenging/determinative. * Traffic and environment: closing roads pushes traffic onto others, increasing congestion by reducing capacity. Increasing congestion increases pollution, and keeping it one street away is not enough to make a difference. I would rather the funds/staff time was spent improving crossings or the road surfaces/quality of bike lanes which to me would better tackle the issues. Questions * If this is a school street project would/could it be limited to term time? * Could residents be able to book tradespeople in to visit? Thank you for your consideration. Kind regards, Perth Road, London, N4
Stroud Green SS39	Other view	Additional information on our response sent on the 24th Nov2023. Please note Atlas Property of Stroud Green Road London N4 3EN has been using Perth Road N4 to park our vehicles at various times during the day for the past 34 years and we would like you to favourably consider our request so that we can continue using Perth Road to facilitate our deliveries from our office to various properties within the Borough of Haringey.

Stroud Green SS39	Other view	Dear Ann Cunningham & team Writing to comment on the introduction of a school street zone SS39. First of all I'd like to say that I am generally in favour of School Streets. I live at xxxb Upper Tollington Park, N4, am disabled, have a blue badge and a concessionary parking permit holder. On your stated list for permits to access during the restricted times you list blue badge holders who live out of the zone but need a essential access. Would that apply to me? This is a route I regularly need to use once or twice a week to access shops on Stroud Green Road, which I have to drive to. The School Street restrictions would mean me having to do a dangerous U-turn on Stroud Green Road to return. I generally try to avoid this route when the school is opening and closing, but occasionally it can't be avoided. If in the current plans someone like me would not have access I would petition you to consider allowing it. There would be very few people like me, so it would not have much impact on the school Street, but it would make my already rusticate life in London easier.
Stroud Green SS39	Other view	Hi Traffic Orders team, I am emailing with regards to the proposed School Street area around Stroud Green school. We are very much in support of it however I am email with regards to the boundary line. We live at xx Upper Tollington Park which is just outside the boundary by one house. Due to the fact we have no direct parking outside our house we often park on the part of Florence Road which is within the proposed school street area. Parking here is easier and safer for us with the children as Upper Tollington Park is very busy, and we often cannot park close to our house. Therefore I would like to request whether we could be included within the school street area, like our neighbour at no. 62 is? We fear that within the current school street boundary we would be restricted as to when we could drive and park our car. Thank you for your help.
Stroud Green SS39	Other view	As Woodstock Rd is very busy with pedestrians during the daytime and it is also the main road to the school drop-off and pick-up; then it would be great if residents could put their dustbins inside, instead of leaving them on the pavement. Also the road needs to be kept clean regularly if pupils and pedestrians expect a clean environment. Please consider having larger bins on Stroud Green Rd and Woodstock in order to deal with the piles of rubbish.
Stroud Green SS39	Other view	Before supporting, I would like to see traffic stats with a breakdown of type; e.g. resident, vs deliveries / services. Also I'd like to better understand the process you have to get tradespeople exemptions. Additionally I'd like to know what engagement there has been with the business and services sector.
Stroud Green SS39	Other view	I'm very supportive of traffic calming and promoting active travel. However there really should be a way to allow service vehicles (plumbers, electricians, carers, etc.) to have access in the morning, otherwise it will be very hard to get work done. I don't include deliveries, as I think these can be more flexible with times.
Stroud Green SS39	Other view	It's completely unnecessary to include Oxford and Florence roads in this scheme. Why should people working and /or living there be restricted in how they can exit / enter without passing the school. Of course - in my experience - you won't take any notice of my response. You think consultations are just for box-ticking.
Stroud Green SS39	Other view	Woodstock Rd only gets busy at drop off and pick-up times, so traffic is not really an issue here. It would be more helpful if parents would switch off their engines at these times. We need a zebra crossing to Stroud Green and Woodstock Rd corner please. That area is in need of more attention. Thanks.

Stroud Green SS39	Support	This will make it much safer for my children (and all students) to get to school.
Stroud Green SS39	Support	As a local resident whose children attend Stroud Green School, I fully support the introduction of this school street. My children walk to school every day and have had several near misses on Perth Road. In addition, cars often double park at pickup and drop off times, paying no attention to children walking past when they open their doors.
Stroud Green SS39	Support	As a parent at Stroud Green school this would make our kids a lot safer. Big fan. There is definitely a problem with huge SUVs and deliveries at school drop off time
Stroud Green SS39	Support	As a parent of two children at stroud green school I completely support this plan.
Stroud Green SS39	Support	I am a parent with a child at Stroud Green Primary and I fully support the school street proposal. There have been a number of near misses in recent years where a child or group of children have only narrowly avoided being hit by a car as they enter the school gates. Double parking outside the school by parents who leave their engines idling creates a dangerous and unpleasant environment. The vast majority of pupils use active travel modes to get to school and they should be supported in travelling this way rather than having to run a gauntlet of cars at every drop off and pick up. I really hope this proposal goes ahead; I firmly believe it would enhance the experience of every child at SGS. Thank you
Stroud Green SS39	Support	I fully support this proposal as a parent of children attending Stroud Green Primary, one of whom walks to school by herself. We live just outside the zone, and fully support the proposal for this reason as well.
Stroud Green SS39	Support	I support the school street, as it provides peace of mind. My son is autistic and in his last year of primary school. It will help his development and confide and independence if he is able to safely walk to school on his own in this important year. The school street will make this possible, and he will be able to safely walk to school with his peers.
Stroud Green SS39	Support	My children attend Stroud green school and have to cross Perth road. The traffic at pickup and drop-off is dangerous, with cars double parked and through traffic going around those cars. I fully support having a school street to make it safer for children walking and cycling to school.
Stroud Green SS39	Object	There really isn't any need for this. Traffic is not an issue on this road. I do have children at the school and traffic is not a problem. This I suspect is another revenue raising measure.

Stroud Green SS39	Support	We support the proposals with one amendment. We would like the blue line to be extended to encompass the businesses along Stroud Green Rd ,on Haringey side, and to include No. 98 Stroud Green where our business is located and where we manage over 150 properties. If you are unable to extend the blue line to include our business property we request that you make an exemption and grant us access at all times to the school zone. Most of our properties are located within the Borough of Haringey where we re-house vulnerable families and young people. We have 6 vehicles servicing these properties on a daily basis between the hours of 7.30 am and 6pm. All our vehicles have Borough Wide Permits and we use Perth Road N4 as the most convenient and safe road in which to park in order to collect supplies from our office to service our properties. We are unable to park immediately in front of our office as there are restrictive parking with double yellow lines along Stroud Green road. Approximately 50% of our vehicles are electric/hybrid and our aim is to replace the remaining vehicles to electric. We have already been adversely affected by the numerous driving restrictions within the Borough of Haringey and this has increased our company's expenses. We shall be most grateful if you could grant us this request so that we can access the Stroud Green School Zone at all times
Stroud Green SS39	Support	I fully support the introduction of a school street in this area. These roads are busy during the hours of school arrival and home time. They are used at cut throughs and current measures do not provide a safe environment for children and parents.
Stroud Green SS39	Support	I fully support this scheme
Stroud Green SS39	Support	I have been taking children to Stroud Green school, every day, for nearly 10 years. I have lost sleep over the dangerous rat runs Woodstock/Perth and Ennis roads have become. Drivers routinely speed and engine idle around the school, pollution levels are high, and I've witnessed near collisions between cars, road rage and aggression and school staff and parents (including me) having to step in to manage this. On one terrifying occasion a speeding van failed to see a child trying to cross, between idling cars, and a serious injury or fatality was avoided only thanks to the quick reflexes of his 9 year old sister. This school street is long overdue and absolutely essential to better protect children and their families travelling to and from school. I support it wholeheartedly and will happily suck up the inconvenience of not being able to pick up and drop off in the car.
Stroud Green SS39	Support	I wholly support the implementation of this school street. Not only will it allow for the safe travel of children,, families and carers to and from Stroud Green school but also provide the area, including the school play grounds, with less polluted air for our children and residents to breath.
Stroud Green SS39	Support	Our children have a right to clean air and we have a duty to protect them from the harmful effects of pollution, regardless of the inconvenience to any and all drivers affected by the changes.
Stroud Green SS39	Support	This will be a critical improvement for the school and all its students and staff and parents and all the residents of these roads. Thank you for making this happen.
Stroud Green SS39	Object	For families with multiple small children (I have two preschool children and one school-aged child with a disability) it is difficult to walk the 0.8 mile walk to school every morning. The route is shorter when we pass through Finsbury Park but in winter that is unsafe due to lack of lighting and or security patrols in the park.
St Mary's Priory SS42	Support	

St Mary's Priory SS42	Support	Drivers cause quite a lot of danger for children and parents by inconsiderate "parking" and speeding around here. It's better to have the street closed off to motor vehicles during pick up and drop off times at least. But I'd also like to see it made a full LTN the rest of the time and have through traffic removed permanently.
St Mary's Priory SS42	Support	Hello I'd like to voice my support for the new school street proposed outside St Mary's in N15. It's great to see more safety and less pollution outside of our schools and I look forward to the changes. Falmer Road N15
St Mary's Priory SS42	Support	How will council ensure that Ashfield and Beechfield Road will not be used by St Mary's parents to park and drop off their children? Concerned that without proper management, these streets will get blocked up and cause an increase in emissions and therefore poor air quality, ,which is a health risk.
St Mary's Priory SS42	Support	I am extremely concerned that parents dropping kids at St Mary's will just come and leave their idling cars on our streets. This will cause poisonous air and dangerous pile ups on a daily basis in an entirely residential area. Parents at this school already disregard traffic laws on a daily basis. There are always idling engines polluting and endangering pedestrians. I don't want this to just spread onto our street.
St Mary's Priory SS42	Support	I fully support the school street. The parents at that school are so irresponsible and put the life of children and pedestrians in danger on a daily basis. The school doesn't care either about the safety of its pupils as it allows the parents to park on the pavement and completely block off the hospital entrance. What's more, parents park under the bridge which the restrict the traffic to one lane and on several occasions I have witness larger trucks having to mount the pavement under the bridge which is already extremely narrow and making this extremely dangerous for pedestrians. The school never has any staff to check and tell the parents to park so dangerously and when a pedestrians points out that the pavement is blocked the drivers become very aggressive. I am also concerned that if the school street happens all the parents will park on Oakdale and Beechfield and leave their engines idles in mass like so many of them are already doing so I would like to see Oakdale road to be out of bounds for access at street school times. I would also like to see some supervision from the council once the school street is in place to avoid the constant idling of engines. I am attaching many examples of dangerous and irresponsible parking. But you only to come and see for yourself at every school time to see the entrance to the hospital used as a car park for the parents
St Mary's Priory SS42	Support	I fully support this initiative. As well as creating a safe environment for the children it will bring wider benefits to the community. This road has become a rat run.
St Mary's Priory SS42	Support	I love locally and support the implementation of a school street, but as a local resident, it would be good to be able to have access to the street. If access could be allowed for residents from Beechfield road during the restricted times that would be good, as otherwise we cannot leave the area by car during the restricted times, other than via Tiverton road.

St Mary's Priory SS42	Support	I regularly walk and cycle down Hermitage Road with my kids. It is a very hostile road due to speeding traffic cutting through Hermitage Road, to shave a few minutes from their journey onto Seven Sisters. That additional traffic makes crossing the road on Hermitage feel really unsafe. This road is home to a hospital, nursing home, and school. It should be a safe space to be a pedestrian, and a school street would really help with this. When I'm on a bike I'm frequently overtaken very closely. Hermitage Road is an important cycle route for residents in st Ann's. Half of Hermitage road is already filtered and is pleasant to cycle down. But the stretch by St Mary's is pretty unpleasant and really needs improvement. I really support the councils efforts to make this school street a reality, to both improve road safety, improve air quality, and to support the environment.
St Mary's Priory SS42	Support	I support the proposal for a school street at St Mary's catholic school. This street is particularly hazardous for pedestrians and cyclists at school drop off and pick up times because of the behaviour of parents in cars. This is a problem for all those who use the area, including kids walking through to reach st Ann's or Chestnuts schools as well as st Mary's pupils. I'm very surprised there has been no serious collision. The school street proposal would prevent collisions and provide a safer environment for everyone.
St Mary's Priory SS42	Support	I wholly support making this section of Hermitage Road a school street. I am one of the residents that will be immediately affected but I feel that the positives of the change far outweigh the negatives. Whilst many parents/caregivers of children attending St Mary's Priory do walk or cycle to school, there is a large number that are using motor vehicles. Sadly, these motorists continually park on the pavement and block it for pedestrians. I have tried asking individuals to move their vehicles, but their behaviour has continued and I have received aggression from parents when I do this. Preventing vehicle traffic from entering the road is the only way to improve the safety of pedestrians and non-motorists.
St Mary's Priory SS42	Support	I will feel safer walking my kids to school and better for their health
St Mary's Priory SS42	Support	Not safe
St Mary's Priory SS42	Support	So important for reduced traffic around schools for air quality and safety
St Mary's Priory SS42	Support	The cars parking in this area feels dangerous when I am taking my son to nursery on his bike. Cars just pull onto the kerb out of nowhere and just this morning, my son was almost hit near the hospital entrance here by someone who had parked up there and accelerated - that specific space does not feel like a road and encourages people to park there. In addition, people who park there are defensive and aggressive when questioned of why they are disobeying the request made by the school very explicitly. Please make this area a safe place for local residents children.
St Mary's Priory SS42	Support	The current situation where cars are either driving at speed along Hermitage and parking against the law and blocking pedestrian walkways is extremely unsafe for families walking or cycling to and from St Mary's School and other schools in the area, plus all other non-car driving commuters. I therefore not only welcome the proposal for the St Mary's Priory School Street, I am wholeheartedly in favour of it.

St Mary's Priory SS42	Support	The proposal would limit speeding cars and help improve the awful pollution in the area, making it far safer for my young children.
St Mary's Priory SS42	Support	This school street will make a big difference to the chaos that happens outside the school at the start and end of the day. I was regularly taking my daughter to nursery and having to go via Hermitage Rd. Cars pulling up on the pavement, beeping their horns, parking on the road where they shouldn't. The amount of traffic near the bridge as well made that section even more dangerous than it already is. This will have a very positive effect on road safety.
St Mary's Priory SS42	Support	We desperately need a school street- being consistent with other school seems fair
St Mary's Priory SS42	Support	
St Mary's Priory SS42	Support	
St Mary's Priory SS42	Support	
St Mary's Priory SS42	Support	I'm a supporter of SS when they are enforced. As a local head teacher I know that they can work; but only when the authority provides patrols.
St Mary's Priory SS42	Support	Make the start time 8am, so it will be 8am - 9am. The afternoon is 1 hour, so make the morning the same.
St Mary's Priory SS42	Support	No suggestions - just really hope this goes through, as it's a really dangerous road for the kids.
St Mary's Priory SS42	Support	Please ensure you install cameras! I'm fully supportive of the school street, and as a parent myself; I am shocked by the unsafe driving of so many parents of the school children.!!
St Mary's Priory SS42	Support	Support, but we hope this does not affect the chances of Hermitage Rd getting a proper LTN filter to combat the rat running traffic
St Mary's Priory SS42	Support	The project may impact the flow of traffic in both Templeton and Moreton roads. This is often down to one lane and could get worse. Please look into this and make the necessary improvements.
St Mary's Priory SS42	Support	Widen the pavement under the bridge. This scheme can't come soon enough - at last the health and safety issue is to be dealt with - it's been a disaster waiting to happen.. There's not enough space on the pavement for mothers with pushchairs and small children under the bridge. Please do it.

St Mary's Priory SS42	Object	Hello, As a resident directly affected, I wish to object to the council's proposed scheme to turn the main thoroughfare in and out of my area into a school street at the start and the end of the school days. (2023 – T10 ST MARYS PRIORY SCHOOL STREET SS42) Whilst I have no objection to school streets in general. Ambler Primary in Finsbury Park, for example, had a school street in the residential street behind it. This worked well because it was an exclusively residential street being misused around school pick up and drop off. That is not the case with this proposal. Hermitage Road a crucial throughfare for the triangle of houses affected by this proposed scheme (Hermitage, Ashfield, Brookfield, and Oakdale). Here are my objections and suggested compromise solution. Limited Accessibility, Congestion & Traffic Management: Hermitage is already blocked at the corner of Ashfield Road going towards Green Lanes, making our only access/exit via Eade Road to Seven Sisters Road, which is often extremely congested with commercial and visiting vehicles, or Templeton Road also to Seven Sisters. Templeton is a narrow street through a busy residential estate. I'm sure driving down through an estate during school pick up and drop off times is not what the council wish to encourage. In effect this proposal would leave the residents of the 'triangle' with only Eade road as an exit/entrance. On top of the congestion problems already stated, Eade Road is in the process of rapid expansion, with flats, commercial premises and storage all growing fast. This will clearly impact on congestion and pressure on that road even more. It is worth reiterating the importance of Hermitage Road as a necessary throughfare, if we only have access to Seven Sisters as suggested, then what if Seven Sisters is closed, which is sometimes the case? Also, since the introduction of the LTNs in the area, Seven Sisters Road has become extremely busy, with lots of idling traffic stuck in jams as people try to make short local journeys, which, when you have a young family, suffer illness, or have sick relatives are sometime necessary. I'm sure this was not the intentions of the LTNs, and overall, I am supportive of them, but the daily, lived experience of their traffic impact on this particular area suggests to me there is a problem with the scheme. A school street on top of the large number of other traffic calming measures already undertaken in this small area, is unreasonable. (We already have no access to Green Lanes via Hermitage Rd due to the barrier, and no access to West Green Road due to LTNs). Safety: It is worth noting that St Mary's Priory School, as a catholic institution, accept lots of children from outside the catchment area, many of these children are driven to school and park on the double yellow lines opposite, causing bottlenecks and forcing cars to go around them. This is the most dangerous thing happening on that road and is nothing to do with the residents as we never have cause to park or idle our cars there. I believe robust enforcement of the double yellow lines would be a far simpler, cheaper, and more effective solution.

		Impact on Community and Local Business: It is obvious that this proposal will adversely affect deliveries, local business, as well as all those with young children (me included) who need to use their cars for the school run, or for elderly residents with hospital appointments. We also have a thriving Orthodox Jewish community in our small enclave who often need access to their synagogues, schools and other institutions. Compromise: If you are intent on going ahead with a scheme that seems to have very little local support, may I suggest this compromise: Expand the school street to include the 'triangle' so that we as residents are exempt, as well as making the section of Hermitage Road from Ashfield Road to Green Lanes an LTN, remove the barriers and use cameras that allow residents of the triangle to use Hermitage Road to access Green Lanes. Invitation to visit the site & Further Consultation: I would ask anyone involved in this decision to come and take a look at where the traffic problem really lies during pick up and drop off, and also to better understand the unique geography of our enclave that make this proposed scheme such a bad idea. Thanks for your time and please keep me notified of any meetings to discuss this matter further.
St Mary's Priory SS42	Object	I reject the proposal of the School Street Scheme at St Mary's Priory. Hermitage Road is a main thoroughfare for residents, which is already restricted as Haringey Council have closed the Hermitage Road/ Green Lanes entrance for many years. Closing the Hermitage Road/St Ann's Road entrance will detrimentally impact the daily lives of residents living nearby. Templeton Road is not a suitable alternative as it is narrow and only allows one vehicle to pass at a time. It is a heavily built up area and dangerous. Turning into Templeton Road from Hermitage Road is also problematic as there are shops nearby which often have parked delivery vans outside. These vehicles make the turning even narrower and restrict visibility. Should parents at St Mary's Priory want to restrict traffic, then they should stop driving their children to and from school. It is unfair to demand local residents do not have access to this street, because the School cannot implement a specific non driving ban for parents only. This School Street Scheme is badly thought out and will cause multiple accidents.

St Mary's Priory SS42	Object	DUPLICATE As a resident directly affected, I wish to object to the council's proposed scheme to turn the main thoroughfare in and out of my area into a school street at the start and the end of the school days. (2023 – T10 ST MARYS PRIORY SCHOOL STREET SS42) Whilst I have no objection to school streets in general. Ambler Primary in Finsbury Park, for example, had a school street in the residential street behind it. This worked well because it was an exclusively residential street being misused around school pick up and drop off. That is not the case with this proposal. Hermitage Road a crucial throughfare for the triangle of houses affected by this proposed scheme (Hermitage, Ashfield, Brookfield and Oakdale). Here are my objections and suggested compromise solution. Limited Accessibility, Congestion & Traffic Management: Hermitage is already blocked at the corner of Ashfield Road going towards Green Lanes, making our only access/exit via Eade Road to Seven Sisters Road, which is often extremely congested with commercial and visiting vehicles, or Templeton Road also to Seven Sisters. Templeton is a narrow street through a busy residential estate with current works going on. This will be our nearest/ main way out during the restricted times and is already massively congested. As far as I have been made aware traffic can drive out of the restricted streets but not into it? If this is that case what is preventing the people who currently cause congestion – IE none residents who drive their children to the school – driving into Eade Road or Templeton Road and waking the short distance to the school, then using the road anyway? On top of the congestion problems already stated, our other access / exit is Eade Road. This is in the process of rapid expansion, with flats, commercial premises and storage all growing fast. This will clearly impact on congestion and pressure on that road even more. It is worth reiterating the importance of Hermitage Road as a necessary throughfare, if we only have access to Seven Sisters as suggested, then what if Seven Sisters is closed, which is sometimes the case? Also, since the introduction of the LTNs in the area, Seven Sisters Road has become extremely busy, with lots of idling traffic stuck in jams as people try to make short local journeys, which, when you have a young family, suffer illness or have sick relatives are sometime necessary. I'm sure this was not the intentions of the LTNs, but the daily, lived experience of their traffic impact on this particular area suggests to me there is a problem with the scheme. The air is not cleaner / arguably MORE pollution hours have been created and the pollution has just moved to the roads that are not part of the LTNs. A school street on top of the large number of other traffic calming measures already undertaken in this small area, is unreasonable. (We already have no access to Green Lanes via Hermitage Rd due to the barrier, and no access to West Green Road due to LTNs). Safety: It is worth noting that St Mary's Priory School, as a catholic institution, accept lots of children from outside the catchment area, many of these children are driven to school and park on the double yellow lines opposite, causing bottlenecks and forcing cars to go around them. This is the most dangerous thing happening on that road and is nothing to do with the residents as we never have cause to park or idle our cars there. I believe robust enforcement of the double yellow lines would be a far simpler, cheaper, and more effective solution.

		Impact on Community and Local Business: It is obvious that this proposal will adversely affect deliveries, local business, as well as all those with young children (me included) who need to use their cars for the school run, or for elderly residents with hospital appointments. We also have a thriving Orthodox Jewish community in our small enclave who often need access to their synagogues, schools and other institutions. Compromise - If you are intent on going ahead with a scheme that seems to have very little local support. Can we please see evidence of the support we have been told about. May WE suggest this compromise: As well as making the section of Hermitage Road from Ashfield Road to Green Lanes an LTN, remove the barriers and use cameras that allow residents of the triangle to use Hermitage Road to access Green Lanes. The barriers should have been removed before LTN's were put in place on may of our routes out of our Triangle. Invitation to visit the site & Further Consultation: I would ask anyone involved in this decision to come and take a look at where the traffic problem really lies during pick up and drop off, and also to better understand the unique geography of our enclave that make this proposed scheme such a bad idea. Thanks for your time and please keep me notified of any meetings to discuss this matter further. BBC Radio 2, Room 315, Wogan House, 99 Great Portland Street London W1A 7NY

St Mary's Priory SS42	Object	DUPLICATE As a resident directly affected, I wish to object to the council's proposed scheme to turn the main thoroughfare in and out of my area into a school street at the start and the end of the school days. (2023 – T10 ST MARYS PRIORY SCHOOL STREET SS42) Whilst I have no objection to school streets in general. Ambler Primary in Finsbury Park, for example, had a school street in the residential street behind it. This worked well because it was an exclusively residential street being misused around school pick up and drop off. That is not the case with this proposal. Hermitage Road a crucial throughfare for the triangle of houses affected by this proposed scheme (Hermitage, Ashfield, Brookfield and Oakdale). Here are my objections and suggested compromise solution. Limited Accessibility, Congestion & Traffic Management: Hermitage is already blocked at the corner of Ashfield Road going towards Green Lanes, making our only access/exit via Eade Road to Seven Sisters Road, which is often extremely congested with commercial and visiting vehicles, or Templeton Road also to Seven Sisters. Templeton is a narrow street through a busy residential estate. I'm sure driving down through an estate during school pick up and drop off times is not what the council wish to encourage. In effect this proposal would leave the residents of the 'triangle' with only Eade road as an exit/entrance. On top of the congestion problems already stated, Eade Road is in the process of rapid expansion, with flats, commercial premises and storage all growing fast. This will clearly impact on congestion and pressure on that road even more. It is worth reiterating the importance of Hermitage Road as a necessary throughfare, if we only have access to Seven Sisters as suggested, then what if Seven Sisters is closed, which is sometimes the case? Also, since the introduction of the LTNs in the area, Seven Sisters Road has become extremely busy, with lots of idling traffic stuck in jams as people try to make short local journeys, which, when you have a young family, suffer illness or have sick relatives are sometime necessary. I'm sure this was not the intentions of the LTNs, and overall, I am supportive of them, but the daily, lived experience of their traffic impact on this particular area suggests to me there is a problem with the scheme. A school street on top of the large number of other traffic calming measures already undertaken in this small area, is unreasonable. (We already have no access to Green Lanes via Hermitage Rd due to the barrier, and no access to West Green Road due to LTNs). Safety It is worth noting that St Mary's Priory School, as a catholic institution, accept lots of children from outside the catchment area, many of these children are driven to school and park on the double yellow lines opposite, causing bottlenecks and forcing cars to go around them. This is the most dangerous thing happening on that road and is nothing to do with the residents as we never have cause to park or idle our cars there. I believe robust enforcement of the double yellow lines would be a far simpler, cheaper, and more effective solution.

		Impact on Community and Local Business: It is obvious that this proposal will adversely affect deliveries, local business, as well as all those with young children (me included) who need to use their cars for the school run, or for elderly residents with hospital appointments. We also have a thriving Orthodox Jewish community in our small enclave who often need access to their synagogues, schools and other institutions. Compromise. If you are intent on going ahead with a scheme that seems to have very little local support, may I suggest this compromise: Expand the school street to include the 'triangle' so that we as residents are exempt, as well as making the section of Hermitage Road from Ashfield Road to Green Lanes an LTN, remove the barriers and use cameras that allow residents of the triangle to use Hermitage Road to access Green Lanes. Invitation to visit the site & Further Consultation: I would ask anyone involved in this decision to come and take a look at where the traffic problem really lies during pick up and drop off, and also to better understand the unique geography of our enclave that make this proposed scheme such a bad idea. Thanks for your time and please keep me notified of any meetings to discuss this matter further.
St Mary's Priory SS42	Object	As residents in this little pocket right by the boundary edge of the borough I feel this proposal further cuts our freedom of access t by car. The only route of access we have are via Eade Rd of Templeton road so the impact of restricting access will be significant and actually potentially dangerous. There is already a long standing no through route at hermitage road where it meets Ashfield road which cuts access from that direction It is already a nightmare due to the LTN … many of the kids at this school are not local and the parents drive their kids to school - but us residents are yet again being penalised and this will make our access to/ from our homes by car virtually impossible - not everyone can go everywhere by bike or foot or public transport. Our community is being turned into an island, cut off from the rest of Haringey …

St Mary's Priory SS42	Object	I am a resident on Oakdale Road and I object to the establishment of a School Street on Hermitage Road as proposed. I have spoken to a large number of neighbours and we cannot see a way to make this proposal work. At present the only vehicle route out of our neighbourhood to access Green Lanes and anywhere to the west is via Hermitage Road and St Ann's Road. This is because many years ago direct access to Green Lanes via Hermitage was closed off with bollards at the junction of Ashfield Road, in order to prevent Hermitage Road being used as a rat run by commuters. This restriction alone more than doubles journeys from 0.6 to 1.4 miles. More recently, further restrictions (LTNs) mean even longer journeys, more traffic and more pollution. We can no longer access West Green Road by car without going all the way to Green Lanes and along to Turnpike Lane. Now it is being proposed that there should be even more restrictions on our movement as this essential access route would be taken from us at certain times of the day. At those times, the only route out of our neighbourhood would be via Templeton Road or Eade /Vale Road. A couple of years ago Hermitage Road was closed at the junction with St Ann's Road for several weeks while the new zebra crossing was installed. This showed us exactly what the effect of the proposed School Street would be. Eade/Vale Road was back-to-back with traffic, while Templeton Road drew to a complete standstill. This is because Templeton Road is only wide enough for a single lane of traffic and relies on passing places for two-way traffic to move. Once traffic builds up beyond a certain point, cars are unable to use the passing places and all movement stops. This also happened a few years ago when lightning struck a tree on Hermitage Road, which had to be closed while the fire brigade sorted out the problem, which took several hours. If the proposed School Streets were in place, the only route out of our neighbourhood via car would in practice be Eade/Vale Road as I would not risk trying to drive down Templeton Road, which might mean being completely stuck for hours. When there is traffic on Seven Sisters Road, the Eade/Vale Road becomes extremely congested with traffic barely moving. If I needed to go to Muswell Hill by car, which I often do in the afternoons as my children have music lessons there and there is no realistic route by public transport, I would have to go via Eade Road (assuming this was even possible), along Seven Sisters and along Green Lanes. This would make a journey of 3.2 miles into a journey of 4.2 miles. It would likely double the normal journey time as the traffic along that route would be very significant in the afternoon. It would probably mean sitting in traffic that was barely moving, adding significantly to the pollution caused by all the cars stuck in the traffic caused by this rerouting. While School Streets can be a sensible solution in some areas, it is clear to me and to all of the neighbours I've spoken to that it would be wholly unworkable in our neighbourhood. It would effectively trap residents of our streets and bar us from using our cars at all during the hours of operation. I am all for encouraging people to reduce their use of cars, but this is not the way to do it, by effectively making it illegal for some people to use their cars at certain times of the day.

St Mary's Priory SS42	Object	I am against this proposal, as the residents of Oakdale Road and surrounding triangle of roads would have severely restricted access to and from their house twice a day. The area already has a traffic restriction in the shape of the barriers on Hermitage Rd, which completely denies access to the west and to close of Hermitage completely for a few hours per day, with only one accessible route out, which is very busy and congested due to residents parking, is unacceptable and would result in being trapped into or homes with no access. I am not against school streets per se and know there are dangers to children due to cars traveling by the school, but the local residents of the triangle, (Oakdale, Ashfield and Beechfield) who know the area and are more aware of these dangers, should be exempt from this school street proposed restriction .
St Mary's Priory SS42	Object	I am in favour of making that stretch of Hermitage road safer, particularly under the bridge and with dangerous parking opposite the school. However I am concerned about the impact on Moreton Road where all traffic will be diverted down. My children attend a childminder on that road, and I think it will become significantly more dangerous with extra traffic. I would like to know what impact assessment has been carried out for Moreton Road.
St Mary's Priory SS42	Object	I am writing to express my strong objection to the proposed school street at St Mary's Priory School with the closure of Hermitage Road. I understand the importance of promoting safety around schools, but I believe this particular plan poses significant challenges and inconveniences to local residents. Templeton Road is already burdened with limited access, and its narrow and hazardous conditions make it difficult for traffic to flow smoothly. The road's structure allows only one car to pass at a time, and the presence of a blind bend as it turns into Moreton Road adds an additional layer of risk. Closing Hermitage Road for a school street scheme would exacerbate these issues and further impede the daily lives of residents. Moreover, I am concerned about the lack of information regarding local support for the school street scheme. To my knowledge, there have been no visible campaigns or efforts to gauge the opinions of those directly affected by this proposal. It is crucial that the community's voice is heard, and any decision-making process should be transparent and inclusive. I am sceptical about the true motives behind this initiative and fear that it may be driven more by revenue generation than genuine concerns for health and safety. While I understand the need for measures to protect children, it is essential to balance these initiatives with the practical realities faced by local residents. Allowing controlled access for residents through the existing barriers on Hermitage Road could relieve the inconvenience. This way, traffic around the school is controlled, while residents can still enter and exit the neighbourhood without excessive disruption. In conclusion, I urge the Haringey Council to reconsider the proposed school street at St Mary's Priory School, taking into account the concerns raised by local residents. I request a thorough review of alternative solutions that prioritise both safety and the needs of the community. Thank you for your attention to this matter. I look forward to a fair and considerate resolution that takes into account the well-being of all parties involved.

St Mary's Priory SS42	Object	I don't believe that this zone will substantially increase the safety of children (who should be taught proper street behaviour from early age rather than create habit of not paying proper attention to the road traffic because there's not supposed to be any) but it will certainly be a nuisance to all residents. The leaflet mentions climate, pollution and obesity as the reasons for the school street project. I'm pretty sure there are more effective (and more positive - encourage vs. enforce and prohibit) ways of dealing with those issues with orders of magnitude higher levels of impact. Enforcing school streets is just more visible and easier.
St Mary's Priory SS42	Object	I object this school street plan as this will cause me loads of traffic to enter my street and exiting my street during school street hours
St Mary's Priory SS42	Object	I STRONGLY OBJECT to the School Street Scheme at St Mary's Priory (SS42) for the following reasons: 1. I am a resident that lives less than 0.25miles from the school and Hermitage Road is the safest, most environmentally friendly and convenient way to leave my house via car. The other exit of Hermitage Road (that leads to Green Lanes) is permanently blocked by bollards. It is unfair to restrict the follow of traffic completely on Hermitage Road twice a day. The only other way to leave our houses is via side streets which are unsafe and/ or completely out of the way e.g Templeton Road + Moreton Road and Vale Road + Eade Road. Templeton Road leading onto Moreton Road are two dangerous narrow roads which run through a built up housing estate. Traffic cannot flow both ways as the streets are so narrow. Where Templeton Road flows into Moreton Road is a blind bend, which makes it impossible to see oncoming traffic, therefore forcing drivers who end up face-to-face having to reverse. They are very dangerous roads and I avoid them at all costs. Vale Road leading onto Eade Road are windy side streets which add at least a five fold increase to journey times. It also adds unnecessary extra pollution to the surrounding neighbourhood. I wonder whether the heavy flow of traffic at St Mary's Priory School is due to parents dropping off and collecting their children? Has any research been done? If so, the parents should be stopped from using cars, rather than local residents stopped from using the street that they depend on to get about their daily lives. I really doubt that local residents are responsible for the heavy flow of traffic down this street during School opening and closing times. Why are we penalised?! If HGV's are a problem too, ban those drivers. 2. I am also concerned that parents who can no longer drop or collect their children outside the school will simply park on surrounding streets instead i.e. my street which is less than a 5 minute walk from the school. It is unfair to push extra car pollution and traffic onto the boundary roads, because we have the misfortune to live near a School Street Scheme. PS - The online consultation form would only allow me to object under one category. However, my objection falls under all the following categories: Traffic, Safety, Access, Disturbance and Environmental.

St Mary's Priory SS42	Object	I wish to object to the proposed order/plan of 'St Mary's Priory SS' Hermitage Road'. The grounds on which I make this objection is that we/residents are already subject to limited car access to our homes in the surrounding areas since the added barrier and closing of access via Hermitage Road (from Green Lanes N4 to Ashfield Road N4/from Ashfield Road N4 to Green Lanes N4); and then subject to further restricted delayed access to our homes since the implementation of the Haringey LTN scheme which has caused extra time and finance for crucial journey's such as school runs on the outskirts of the borough and going to places of employment. Considering the above presenting circumstances - I am requesting and supporting that there is some compromise given? such as the opening of Hermitage Road (by the barrier), for residents residing close by to St Mary's Priory Catholic Infant and Junior School on Hermitage Road N15.
St Mary's Priory SS42	Object	My main problem with this is scheme is that we have complained on multiple occasions about parents parking on the kerb and yellow lines along this stretch of Hermitage Road and we never see traffic wardens here to discourage the parking by parents from outside our area and yet we will have the wardens on Oakdale and Ashfield Road to start ticketing as soon as restrictions start so we don't know if these measures would work. I do have to drive for work and this is going to add to my day. My son could not attend this school as it is a faith school so we had to send him to one further away. Will teachers get passes for the road? If so this seems wrong also.
St Mary's Priory SS42	Object	Parents that park illegally along hermitage road outside St Marys Priory will simply move their vehicles to on Moreton road, Beechfield and Oakdale. This will cause huge congestion and safety issues (parents are already aggressive and park dangerously on hermitage road. Why can't you simply ticket illegal parking, instead of pushing this problem on to residents in surrounding streets?
St Mary's Priory SS42	Object	The area is already a low traffic neighbourhood zone with bollards stopping through traffic on Hermitage Road from Green Lanes and St Ann's. The school has a hospital opposite it, which patients visit from far and wide via taxis and private vehicles. The school has students that travel far and wide to get there since it is a Catholic school. As a worker in a school in Barnet and with family responsibilities I use the road during the times it will be closed off. I am contemplating leaving education, like many of the teachers from my sons' current school Parkview and previous school, Chestnuts, since getting to these schools has become increasingly difficult. The cost of living and the frustration of living in the capital is making living in the Capital unsustainable. The increased gridlock and road rage that this would cause on the Seven Sister Road and on St Ann's Road makes the idea of closing this road completely unsustainable. Patients will land up being ticketed owing to not knowing the area and teachers and teaching assistants will find other work. The pollution and chaos on Seven Sister road will increase. Templeton Road will become gridlocked, causing congestion to an high density living area - which has already got a new tower block without any further amenities or access points. Haringey has got some wonderful attributes: diversity, Turkish restaurants, parks and good public transport. However the cost of being able to go to work, see friends , collect your children and go shopping has made us found ourselves thinking if its time to sell up and move on to a more family friendly place. Low traffic neighbourhood zones are very much like Brexit. They are divisive, with winners and losers. Haringey does needs to get rid of some of them before contemplating more catastrophe.

St Mary's Priory SS42	Object	This severely limits access for residents of hermitage, Oakdale and Beechfield roads. This area is effectively a cul-de-sac and relies on Hermitage/St-Anns road for access to green lanes or exit from the area. Traffic along Moreton road is already heavily congested and will be at a standstill if this St Marys priory restriction are put in place. Effectively reducing the social mobility to near zero. This is particularly problematic for disabled or mobility limited residents who have clearly been forgotten about. Would also ask where the democratic mandate is for this project or the apparent inability to provide permits for all residents in the impacted streets? This idiotic plan can only go ahead if free permits are provided to all residents in hermitage (after the road block), Oakdale and Beechfield roads. Otherwise this is an attack on personal liberty, social mobility and parent's right to decided where their children go to school (how will this work for children who need to travel to specialist provision school). Please focus on crime, disrepair of street furniture and funding for schools, and abandon this disablist, anti-democratic cash grab.
St Mary's Priory SS42	Object	This will cause us that we won't be able to access and exit our street during the school street hours as all the streets around will be full of traffic
St Mary's Priory SS42	Object	I believe that the proposed school street by St Mary's School in Hermitage Road, N15 is unfair, and I am against the proposal. Being a long time resident of Oakdale Road, N4, I have often felt trapped and caged in since the middle part of Hermitage Road was closed off to motorists back in approx. 2000/2001. Hermitage Road is the only way out of the area by car to Green Lanes or that direction because of the bollards at the junction between Ashfield and Hermitage Roads. Templeton and Eade Road are not only inconvenient for Green Lanes - adding a huge amount to already over long journey - they would also quickly become impassable if Hermitage Road was closed off. It would it be unfair to take any traffic from Hermitage Road which is minimal and place it into Templeton Road, this is unfair on any of the residents that live on that road. We would in practice be unable to use our cars during the times of operation, which is in my view an unacceptable restriction on our basic liberty. The impact of the school street means we couldn't get deliveries or have any guests during the restricted times (about 1 hour in the morning and 1 hour in the afternoon). Although this sounds minimal, it is still very impactful. I don't think anyone would consider the school street a realistic solution. A suggestion, open up the various bollards in and around Hermitage Road and make them LTN's. That way local residents can use them. I certainly wouldn't feel as trapped. To make my feelings clear, I am against the proposed Hermitage Road School Street. Oakdale Road, London, N4 1NU

St Mary's Priory SS42	Object	DUPLICATE I am writing to object to the proposed changes outlined by the council for school roads. Whilst I understand the benefits that a low traffic and clean air zone would bring to the immediate area outside of the school. Ultimately, this is a wider, regional problem, which is being tackled by Tfl and the Mayor for London with the expansion of the ULEZ zone. These proposed changes by the council to restrict the movement of cars outside the school during certain times of the day will only compound traffic in the local area and move the problem elsewhere, whilst complicating travel for many across the school and borough. Additionally, Staff at the school are concerned about the impact to children's punctuality and attendance - we have many children living and travelling into school, from outside the borough and these changes would impact on them the most. Due to a shortfall in Government funding and Haringey council rehousing and moving many families on social housing to cheaper, more affordable housing outside of the borough - this has lead to more families with ties to the school having to travel in. Ultimately, a reduction in the numbers of children attending school would compound these changes and further escalate recruitment and funding problems across the school in the near future. With numbers on roll potentially falling and recruitment becoming increasingly acute as a consequence, will Haringey Council step in to fund any short fall or take responsibility for any future redundancies because of their actions to implement school roads across the borough? Finally, being an active rider, I approached the council to improve the cycle to work scheme, as well as open the scheme up to include electric bikes. I was hoping to purchase an electric cargo bike to transport my two daughters to school and from school but the council cannot / will not improve their package - this could result in me having to purchase a car, thus adding to the pollution of the local area. The council should be actively supporting alterative means of travel and helping staff to make the switch from car to bike. Before the Council implements such actions, they should really engage with the local community, teaching staff from all schools and have drop in centres at each school site with a range of translators to communicate and engage with non-native English speakers about these changes and not rely upon a notifications on lampposts which could go amiss. I feel that this process has not been truly representative to all nor accessible - more should have been done to engage with all in the wider community.

St Mary's Priory SS42	Object	I write as the Secretary of the Palace View Residents' Association concerning the proposed imposition of a school street outside of St Mary's C of E school on Rectory Gardens N8 and there a number of points I wish to raise in no particular order: * Rectory Gardens already has a full day CPZ from 8.30 to 18.00 from Monday to Friday so the prohibition of traffic should not be a problem as no one should be able to park. As I understand it a cabal of parents regularly stop on Rectory Gardens running their engines thus causing pollution. Surely it would be easier to patrol Rectory Gardens and fine these miscreants rather than penalising the local residents? * The residents of the roads running off Nightingale Lane (North View, South View, Beechwood and Hawthorn Roads) will be affected by this school street but there has been no consultation with them. Why not please? * It is not unknown for the bottom of Nightingale Lane to be flooded, and not just in the winter. How are residents to get out of the estate when this scheme is in operation? Will they automatically fined when they are trying to go about their daily lives? * Has any thought been given to the fact that a school street is in place for Campsbourne School? Children walk up and down Nightingale Lane and its environs to attend Campsbourne School. Added traffic along Nightingale Lane and its surrounding streets will have a detrimental effect on these children due to inconsiderate people who will not walk their children to St. Mary's. These parents could easily park at Sainsbury's and walk their children to school. These are just a small selection of thoughts on the matter, and I should appreciate some feedback answering them please. Secretary PVRA
St Mary's Priory SS42	Object	Vehicle owners on Beechfield Road are already restricted access to Green Lanes due to bollards on Hermitage Road. Access to streets beyond St Ann's Road have recently been restricted due to LTNs. If this scheme is to be implemented, we'll be forced to go via an already often congested Seven Sisters Road to get to a number of streets in our locale. This seems wholly unfair to local residents on Ashfield, Beechfield and Oakdale Roads.
St Mary's Priory SS42	Object	We are a road which is hard enough to get too and having a School zone will further impact access to our road which now already suffer at the school times with additional traffic it will be very hard to access seven sisters or St Ann’s Rd. If this scheme does go ahead I believe Oakdale Rd should also be exempt by accessing the school zone.
St Mary's Priory SS42	Object	Why as residents are you punishing us residents and putting our local shop at huge risks at his business being affected by this proposed school street? Open Hermitage Road and make it an LTN allowing us to leave our homes then allowing you to have your school street without causing so much upset and animosity. Please consider our elderly and disabled neighbours and those unable to ride a bike or walk.
St Mary's Priory SS42	Object	
St Mary's Priory SS42	Object	
St Mary's Priory SS42	Object	

St Mary's Priory SS42	Object	
St Mary's Priory SS42	Object	Either include the triangle of Oakdale / Ashfield / Hermitage or cancel the scheme. To make a scheme by blocking in these few roads and not giving us an alternative way out (and NO, Templeton / Morton road is not a way out) it's chock-a-block every morning.
St Mary's Priory SS42	Object	How can you lock us literally in our homes which Mr Hakata is again doing. Open up Hermitage Rd and make it an LTN (Hakata also loves those) for us residents.
St Mary's Priory SS42	Object	Remove barrier form Hermitage Rd to allow us to exit on to Green Lanes. Please check my address.
St Mary's Priory SS42	Object	Take down the barrier in Hermitage Rd to enable us to access Green Lanes exit. This will trap us because the top of the road is blocked by a barrier in the middle of the road. There was no ballot about the road being closed for 24 hrs / day. Not good!
St Mary's Priory SS42	Object	The opening of the barrier on Hermitage Rd N4
St Mary's Priory SS42	Object	There is not much car traffic on this road, so closing the road would be more of a disturbance than a benefit for the neighbours. Thanks
St Mary's Priory SS42	Object	Will adversely impact my commute to work. No traffic there as is making my travel cost more.
St Mary's Priory SS42	Object	Will affect my quality of life and will cost a lot more when I need a taxi. This is already a low traffic area.
St Mary's Priory SS42	Object	Yet another nonsense scheme to take money unnecessarily from the citizens of Haringey. Please stop it.
St Mary's Priory SS42	Support	As a resident and a parent to 2 children at st Mary's I support this school street. The illegal parking is a continuing problem and the massive trucks that pass down that road are dangerous as well as the narrow road under the bridge.
St Mary's Priory SS42	Support	I walk this route at least twice a day with my 2 young children, including during school drop-off and pick-up times . The stretch of road in question is always busy with vehicles and there is an ongoing and longstanding issue with pavement parking by some parents of the school which the school has been unable to prevent. It's very common to see speeding vehicles as well as heavy vehicles. All this, combined with the narrow pavement under the bridge, make me concerned for the safety of my children both in terms of potential for a road traffic accident and pollution. Being able to walk to and from school without the presence of speeding cars and heavy lorries would be such an improvement to our day to day lives and I would have the confidence to let the children cycle.
St Mary's Priory SS42	Support	My children go to chestnuts primary school, but we would benefit from this proposed school street because we easily along hermitage road to get to st Ann's Road every day and back.

St Mary's Priory SS42	Support	Hermitage road is a nightmare at commuting time, and I have long said this street needs restrictions to keep people safe. I cycle, run and walk down this road on my commute and to get to shops and Finsbury park. I use the road by bicycle and foot several times a day. During school times it is dangerous, as is evenings when cars speed down the road. The forced one way under the railway bridge is also a hazard as cars regularly park outside the shop and block the road. This road is one of the most dangerous parts of my commute, and I go to central London nearly every day. Closing the street to motor vehicles at school times is only part solution, and although I wholly support it here, I feel it doesn't go far enough. The road should be made one way, and closed to through traffic. Better yet, close the entire road off and pedestrianize it.
St Mary's Priory SS42	Support	Hi, until recently we used to live on hermitage rd and used to walk/cycle past the school on the way to our own school (chestnuts primary). Now we often make the return journey after school to visit relatives or go towards Finsbury park and can confirm that the traffic restrictions around school pickups and drop-offs are making it much easier for kids to walk and cycle to and from school. we have had a very positive experience from our own safe street initiative at Chestnuts.
St Mary's Priory SS42	Support	I cycle to work down Hermitage Road. I always manage to leave too late to avoid the school traffic, which there is a lot of. It's shocking how dangerously people drive when there are children involved. People park across the street then run back to their illegally parked vehicles without actually looking. I have had to make emergency stops to avoid a collision which would have caused injury to myself and damage to my bike. Cars pull in and out without indicating, people turn right out of Templeton Road without giving way - again forcing me to stop to avoid being hit. And of course no one wants their children walking to school in a dangerous environment like this - caused by other parents!
St Mary's Priory SS42	Support	I either run or cycle to work. This morning I ran, and I had to run in the street to get around a car that had pulled in to drop a child at school. I felt unsafe doing this and wondered how much less safe it would have been for a child walking to school. If the driver reversed back out they would have at least been able to see me in the mirror and hopefully not driven into me. But a child would be a lot less visible. I feel unsafe when cycling past too as driver behaviour at school drop off time is very unpredictable.
St Mary's Priory SS42	Support	Our children have a right to clean air, and we have a duty to protect them from the harmful effects of pollution, regardless of the inconvenience to any and all drivers affected by the changes.
St Mary's Priory SS42	Support	School streets are wonderful! We need more!

Lancasterian SS12	Object	Dear Sir/Madam I'm writing to request permission to drive on Bruce Castle Road during the school street times between 8.15-9.15am and 2.45-3.45pm. I currently have a resident Bruce Castle parking permit, and I live at xx Lordship Lane. My reasons for this request are as follows: 1. I drop/collect my children to/from another school in the area and use my car to do so. I work from home and will need to park my car back on Bruce Castle Road when I return. There will be no parking on Birkbeck Road by the times that I return home (please refer to a map of the proposed school scheme area). The half street / small area on Birkbeck Road will be taken up by local residents and, more importantly, parents of children going to the Lancasterian school. I won't be able to park anywhere else due to having a Bruce Castle parking permit. It will be a huge inconvenience at these times of the morning and afternoon everyday to find parking. 2. It is also very odd and not fair that the house next door to us, in Lordship Lane, has been allowed to use the school street system during these times (even though they also have a lordship lane address). I use and park on Bruce Castle Road every single day to get to my house. I was shocked when I saw the letter from Haringey council with the map of who wasn't allowed to use Bruce Castle road. It doesn't make sense that people who live as far Nursery Street (who don't have a Bruce Castle parking permit) can use the road to drive through at all times if the day and local residents like us can't!! We live nearer to the Lancasterian school than them. Please can you give us permission to apply for a permit to use Bruce Castle Road at all times of the day when the school scheme is introduced for the reasons above. And if not, please give me reasons as to why and whom I can speak to about this. Yours sincerely, Mrs

Lancasterian SS12	Object	I wish to object strongly against the proposals put forward under the 2023-T52 traffic. Once again Haringey is suggesting introducing a scheme which will have a negative impact on local businesses and residents, in particular the elderly, disabled and vulnerable. It should be noted that as well as houses/flats/businesses the area affected also includes two blocks of sheltered housing units. When considering this plan sufficient credence should be given to the following points: • Lancasterian School is situated next to Bruce Castle Park, the beneficial effect of trees on pollutants is scientifically proven. • Fewer older/vulnerable/disabled residents, particularly those in the sheltered housing blocks drive/own cars, they are therefore reliant on taxis or lifts. They cannot be expected to arrange appointments/journeys/pick-ups to fit in with the restrictive hours of a school zone. • The deterioration in mental health, particularly in the elderly, is strongly linked to isolation. Visits are often made by family checking up on an older relative or friends popping in when passing. People will be discouraged from visiting if they receive a fine or are restricted in their arrival times. The residents will discourage visits feeling that it is their fault that their visitor has been fined or inconvenienced. • There are several garages within the affected area. They will lose custom if motorists cannot drop-off/collect their vehicles at a time which is convenient to them and necessary for the mechanics' time management. • The suggestion of removing parking spaces from outside a sheltered housing block seems to show a blatant disregard for the needs of the elderly and vulnerable. Surely the fact that the blocks are home to a large number of residents means that family/friends/taxis need spaces to park. If Haringey is worried by a slight increase in traffic at the beginning and end of a school day perhaps a radical but simple solution would be to ban parents/carers from collecting children by car thus allowing the residents and businesses to continue as normal without being inconvenienced. As with many of these suggested schemes I feel that there is a strong link with increasing council revenue. From past experience I feel that objections are discounted because the decision has already been made. I hope that Haringey can improve its attitude towards the most vulnerable in our society and consider their needs in the light of this proposed scheme.
Lancasterian SS12	Support	
Lancasterian SS12	Other view	
Lancasterian SS12	Object	There are quite enough restrictions in the borough with LTNs. No more are necessary

Lancasterian SS12	Object	Totally object to this. I've never seen congestion at drop off / pickup times on any of the proposed roads. There is also lots of parking. Lancasterian is located at the back of the High Road where children and young people would not be affected by fumes. These SS schemes would be much more appropriate for schools located on busy main roads, not side streets.. I am also concerned for businesses, as customers would not be allowed to go through Church Street to King Street.. Your design does not make sense. The main entrance to the school is not on Tebworth Rd., Nursery St, or King St.; but as the road bends from King St. I don't see why my and many of the other roads mentioned should be targeted. What about the elderly, carers, and vulnerable individuals who need vehicular access? What about trade services and deliveries? This does, I feel, curtail my right to free movement. My parents live on Gt Cambridge Rd., and since the SS at Weir Hall Rd., I cannot collect them and take them to appointments at N. Middx hospital.. Instead, they either have to cross a steep road, or I have to travel all the way around to reach them by car and take them to appts. Will Haringey Council listen to my concerns?
Lancasterian SS12	Object	I'm concerned this will cause problems at the corner of Ruskin and Birkbeck roads, as everyone / parents will use this as a drop-off point. Without being able to turn on to Birkbeck rd. in either direction, everyone will be trying to turn their vehicles around. It will be chaotic. Your proposal will effectively displace any problems into this smaller area. It will just shift the problem. Also, with small signage, lots of people are likely to get fines which they cannot afford to pay.
Lancasterian SS12	Object	I would like the street to remain as they’re now, due to the fact that this Restrictions you’re planning to put on our streets could cost more chaos .
Lancasterian SS12	Object	
Lancasterian SS12	Other view	
Lancasterian SS12	Support	Have you considered the impact this is likely to have on the top end of Church Road, Church Lane, and All Hallows Rd., especially considering there are two schools there?
Lancasterian SS12	Other view	Will residents have to apply for a School Street Exemption? I have a permit for TED days but feel that the onus is on a local resident to re-new this. I almost got a ticket this year as I was not informed by Haringey Council that it had lapsed. There must be a way of ensuring that this can be Auto renewed. Yet more form filling for locals. Also, I do not understand why 4 Event Day parking bays are going to be removed and replaced with Double Yellow Lines? This means that there will be less scope for visitor parking in event days. this area is already becoming very busy with increased Blue Badge holders on TED's. It feels that very little consideration given for local residents. People who actually live here! (Please respond). Lastly there should be some facility for local deliveries, pick-ups for local residents. It feels like this response will be ignored. Lastly, there is a massive typo in the Background section of the consultation document: 'During December 2023 and January 2024, the Council consulted on...' Please get these things right to give some impression that you actually do care about local residents.

Lancasterian SS12	Object	I'm a long term resident living near the school. I'm also disabled, and I rely on taking cabs to and from hospital appmts (which often coincide with the proposed SS times). I need a mobility scooter to 'walk' any distance and do not know what I will do if the cab cannot drive directly to my house in order to drop me back or take me to hospital. As I also live close to Spurs ground, it is already extremely hard to do food shopping etc. on match / event days when roads are closed. It's a nightmare trying to seek medical help or do any shopping while roads are closed. My family already are restricted as to days and times they can visit me and, as a disabled person, I often need their support. It is just so unfair that while businesses get exemptions to carry on as normal; I as a resident am completely invisible in this respect, and not taken seriously. Deliveries of essentials including medicines are also affected by the access restrictions etc., and it makes life extremely hard. Please do NOT let this scheme go ahead.
Lancasterian SS12	Object	It's fine as it is now. I feel there's no need to have a school street
Lancasterian SS12	Object	I believe that making the proposed roads school streets will make it very difficult for some parents taking their children to school. As a resident I don't feel that the disruption is enough to require this.
Lancasterian SS12	Object	Once again LBH are pushing a scheme which will negatively impact local residents - esp elders and the vulnerable. As well as houses and flats, the affected area includes 2 blocks of sheltered housing units. Consider the following points: Lancasterian Sch is situated next to Bruce Castle Park , where the benefits of trees on pollutants is scientifically proven. Fewer older residents (particularly those in sheltered accomm) own or drive cars. They are therefore more reliant on taxis / lifts. They cannot be expected to arrange appointments / travel so they can be picked up and dropped off outside the restrictive hours. Deterioration in mental health is strongly linked to isolation. Friends and relatives will stop 'dropping in' if they are fined or face access restraints. Garages in the restricted area will lose business as a result of the restrictions. It would be more sensible to ban parents form driving to the school, residents and businesses would then not be affected. Removing parking spaces outside residential housing blocks? Where are taxis / visitors supposed to park? Once again this isolates the most vulnerable. This is yet another Haringey money-making scheme.
Lancasterian SS12	Support	Questions 8 & 9 are a little odd. Generally it is a good idea to introduce the school streets around the Lancs School. Current vehicular drop off is chaotic, regular street congestion and parents idling their cars for very long leading to local air pollution - so this will be an improvement! And the map seems updated from the first version with comments taken on board. The Vale's school bus drop off leads also to dangerous cross-over situations when buses enter/ exit the bus parking lot via the footpath - which lead to the Lancs & Vale school entrances. In addition these buses are all relatively old diesel vehicles adding to air pollution during the drop-off/ pick-up times. These should be electrified..., and their drop-off in the mornings re-considered time wise to not clash with pedestrian drop-off.
Lancasterian SS12	Object	Ridiculous idea. Inconvenient, The street doesn't get that busy anyway, and it's never congested or blocked with traffic. This just causes more inconvenience for people who live or work there. This is another stupid and unnecessary idea which will just cause more problems for local residents and businesses. I use my car sometimes around these times for business, or to run errands for my work. The scheme will just create problems for already quiet back roads.
Lancasterian SS12	Object	
Lancasterian SS12	Support	

Lancasterian SS12	Support	I am totally in favour of this proposal. Slightly concerned about the traffic and dangerous parking this will create on the south part of Birkbeck Road and Ruskin Road though.
Lancasterian SS12	Support	The revised plan is much more sensible, and I fully support it. I would love to have this implemented.
Lancasterian SS12	Support	Strongly in favour
Lancasterian SS12	Support	I am generally in favour of the proposed plan, but I believe the signage for the School street could be better. The proposed sign on Ruskin Road is situated past the railway bridge, a driver would need to go into the section approaching Birkbeck Rd before the sign is apparent, this would then require the driver to execute a 3 point turn to avoid entering the School street or the one way section of Birkbeck Rd in the incorrect direction. The sign would be better positioned on the corner of Ruskin and Pembury Roads, giving the driver the option of avoiding the need to execute a 3 point turn. The proposed sign only shows the School street restriction, surely it should also show a No Entry sign for turning left into Birkbeck Rd, as this is a one way street. I would also question the inclusion of Bruce Castle Rd within the School street, as it would be impossible for vehicles to access BCR whilst the school street is in operation on Kings Rd, BCR is not accessible from Lordship Lane due to the traffic flow direction of the Birkbeck / BCR one way system.
Lancasterian SS12	Support	
Lancasterian SS12	Support	Though I welcome the idea, I am concerned about the congestion that will be caused at the Ruskin Road / Birkbeck Road junction. Houses right opposite the road will face a lot of pollution coming from idle cars and I don't think that is fair. It is already very difficult to drive through Ruskin Road on to Birkbeck Road when cars are parked on either side, this will just encourage drivers to park wherever they can e.g. double yellow. Also once the signage is realised it will be too late and might be impossible to turn around, forcing drivers in to the restricted zone given that Birkbeck Road is a one way street. Considering that minibuses carrying school children for the Vale also use this street, this is disastrous. You will have cars trying to turn around back on to Ruskin Road, cars behind also trying to do the same, cars parked on either side making it difficult to turn around, cars coming from the Lordship Lane end of Birkbeck Road also trying to get into Ruskin Road. There will be many arguments and incidents of road rage. The restricted zone should span throughout the length of Birkbeck Road and part of Ruskin Road starting from where it meets with Pembury Road. It will give drivers enough time to react and avoid the restricted zone.
Lancasterian SS12	Support	
Lancasterian SS12	Other view	
Lancasterian SS12	Other view	
Lancasterian SS12	Object	I can't respond properly without knowing the details for getting a blue badge exemption when someone is staying here and how I would apply for an exemption when I have building work done, either planned or more importantly in an emergency. 8.15 is the time most builders want to start work. 9.15 would cut into their working day.
Lancasterian SS12	Support	Too many cars idling with their engines on during drop off and pick up times

Lancasterian SS12	Support	At the moment the level of traffic around the school is high, this causes air pollution which could be alleviated by the school streets programme. I often find it dangerous crossing the road as parents stop directly outside the school, obstructing the view of the road, also cars speed is an issue at times when so many people are crossing. I see the proposed school street as vital as it's only a matter of time before an accident happens. I believe the school streets programme has been delayed already, and I would urge you to delay this no further. I also think there needs to be another pedestrian crossing on lordship lane next to Birbeck road as this is a direct route for children walking.
Lancasterian SS12	Support	I would happily pedestrianize the lot, bar resident vehicles. Introduce more EVCPs as well so people can get EVs. Impossible otherwise. Or make it workable to charge from terraced houses e.g by digging a trench / gully for people who want charging points, so as not to obstruct the pavements. Local electric charging facilities are pathetic.
Lancasterian SS12	Object	SS will cause disruption for residents and traffic will NOT reduce because parents who drive to the school will continue to do so but will now drive up to the boundary and double park. That will cause congestion and potential danger
Lancasterian SS12	Other view	Kings Road has no through access. It is really only the school that would bring in any traffic other than residents. It is very rare that people visit me during the school times. That said not being able to have anyone visit me, deliver to me, or for me to drive out of my road in my partner's car, during those times does feel like I am being victimized for living in Kings Road. It feels like I am being trapped at those times. If this goes ahead, you really need to give residents the ability to get temporary exemptions. Something like the temporary parking permits that we use when we have people in cars or vans visiting us.
Lancasterian SS12	Object	This is not needed in Kings Road, as it is a short road with no access to Tottenham High Road
Lancasterian SS12	Object	
Lancasterian SS12	Object	
Lancasterian SS12	Object	
Lancasterian SS12	Support	
Lancasterian SS12	Support	
Lancasterian SS12	Object	
Lancasterian SS12	Object	

Lancasterian SS12	Object	My son attends this school, and we live a far distance from the school; approximately 13 miles away which I have no other choice but to drive and take him as I also have to get to work on time otherwise this will put my job at risk. My car is ULEZ compliant which suggests that it is not letting off a considerate amount of pollution. With regards to the actual school Road, I have never seen dangerous driving/parking. Parents who walk with their child to school use the road/pavement appropriately hence there has been no accidents related on this road during the school hours which is intended to be put in place before and after school. My son attends this school as it is much easier for childcare, the school is very inclusive, and it is within a good distance of my working environment. Adding this school road will not only put my son's place at this school at risk due to lateness but it will also affect his childcare and my job which is not ideal for either party.
Lancasterian SS12	Object	As we and other parents do not live in walking distance of the school it is not possible to walk or cycle to school each day, we have to drive, so closing road off would stop us accessing school especially as to park anywhere near the school and walk I would need a parking permit which I can not get as I am not a Haringey resident . This would really effect getting both my children into school daily. A zebra crossing or lollipop person could be in place to help with the road crossing if this is felt to be an issue.
Lancasterian SS12	Object	Is easy trop off and pick up the kids to the school. We don't have any problem in this area. Why complicate our life
Lancasterian SS12	Other view	Hi, My daughter attends The Vale Special Needs school in Trulock Road N17. She is disabled and has a blue badge. I understand this school area is under consultation to become a school street. I believe my daughter's school bus, and also myself when I have to collect her, would be exempt. However, my daughter has to travel on the school bus with carers provided by the NHS due to her disability, and they sometimes (although not always) arrive and leave by taxi. How can carers arriving/leaving the school by taxi be exempt so they can arrive and leave within school street times without penalty? Many thanks,
Lancasterian SS12	Support	
Lancasterian SS12	Object	Very low traffic area. No need for change
Lancasterian SS12	Support	The Pavements around the school get busy at drop off /pick up times, you sometimes have to walk on the edge of the kerb and cars can whizz past on church road and king street which can feel quite dangerous.
Lancasterian SS12	Support	Would really like to see the school street come into force, many parents walk their children to the school from a very short distance away, plus it will make manoeuvring a lot easier for the minibuses who drop pupils at The Vale. Plus it will stop that one parent in the silver car who keeps on parking over the key stage 2 entrance.
Lancasterian SS12	Object	Ok you going to close the road on certain off time if I have to take my daughter to school when is raining how I am going to enter to the school street I don't now o you guys think this is not going to solve an problems

Lancasterian SS12	Support	I am very happy to see the revised proposal that has expanded the streets covering the School Street from the previous proposal. For instance, Church Road wasn't included on the first proposal and being a single lane with traffic in both ways, it already has issues, which would be increased if this road gets more traffic (the issue is generally cars coming one way not allowing the circulation of cars coming the other way and being quite aggressive. Also, it is one of the entrances to the school and being a very narrow road, the visibility is not great, and it would be very dangerous with increased traffic). The whole area around the School is protected with this revised proposal which is a massive improvement. There will still be traffic from the school transport going mainly to The Vale School; but it would be a lot easier to manage if there are no other commercial or private vehicles during drop off and pick up times.
Lancasterian SS12	Support	I think the proposed school street can only be a positive thing. It will make the whole experience of walking, cycling, scooting to school much calmer, safer, cleaner & overall a much more pleasant experience. At the times of day proposed the dominant reason for passing through those streets is to get to the school and so priority should be given to pedestrians and cyclists. It will also ease access for pupils who need to arrive to school by car/minibus due to mobility issues.
Lancasterian SS12	Support	I'm don't think question 9 is clear. I've answered as: how I feel about the *current* state of each activity around the school. I feel negative about the safety of cyclists around the school, but positive about creating a safe cycling environment! The reversing school buses of the Vale are a serious incident just waiting to happen, but I realise this is a hard thing to do anything about.
Lancasterian SS12	Support	There is often congestion round Lancasterian school and because Church Road is narrow, drivers can get very frustrated and angry about being held up by others. I have witnessed angry drivers shouting from their windows in front of children. This is unacceptable. I am also concerned about the level of air pollution produced right outside the school by drivers and cars parked with their engines on. Drivers also sometimes drive too quickly round the junction between King's Road and King Street after being held up coming down Birkbeck Road, which makes it unsafe for children crossing. I fully support the school street proposal.
Lancasterian SS12	Object	As I have a 5 yr old who attends the school, a friend's child whom I take to another school, plus a new born baby. If this proposal was to go ahead, It would hugely affect my school run routine in many ways. Especially having to park far from the school to then bring my newborn out into the cold, when I would normally park close by and allow myself and child to walk into school.
Lancasterian SS12	Support	I think it would make sense to make this a school street.
Lancasterian SS12	Support	We cross the park, which is wonderful but the rat problem is too much. As it relates to the road by the school, I've been witness to arguments and fights breaking out between drivers and have been concerned for my sons safety near the road.
Lancasterian SS12	Object	There is no traffic congestion in this area during school times and outside the times.
Lancasterian SS12	Support	
Lancasterian SS12	Support	
Lancasterian SS12	Support	
Lancasterian SS12	Object	

Lancasterian SS12	Support	I walk or cycle to school and am very supportive of the school street. Although the roads near Lancasterian are quieter than some, it can feel dangerous and has poor visibility in some areas.
Lancasterian SS12	Support	
Lancasterian SS12	Other view	There is sometimes congestion along church road especially in the mornings that is outside the reception entrance to the school. Adding to this congestion are cars parked in the controlled parking area that are opposite the businesses along the archway. Having a school parking zone will make drivers find alternative routes to the school on roads that are already congested due to the LTN's in the local area. This will mean that congestion will build up along roads that children use to walk to school, leading to an increase in emissions from the vehicles. There are other schools located near by where congestion will also build up. This may be a quick fix to the issue but perhaps just moving the issue onto other roads which will then experience the same issues
Lancasterian SS12	Support	A good idea. There are a lot of parents/carers dropping off children to school that have no care about where or how they park. Church Road is an extremely busy road during morning drop off and afternoon pick up, with an entrance to the reception and excessive cars travelling at speed up and down this road it is a miracle there hasn't been serious harm to anyone. Perhaps the council could look at additional signage, a zebra crossing or a speed recognition sign that warns driver they are driving faster than they should.
Lancasterian SS12	Support	
Lancasterian SS12	Support	
Lancasterian SS12	Object	
Lancasterian SS12	Support	
Lancasterian SS12	Support	Church Road can become congested and hard to cross at school drop off and pick up times. Having school streets would make it easier for even small children to use active travel methods like scooters to get to school.
Lancasterian SS12	Object	I am concerned about how I will be able to get my children to school as I need to drive to work and there is no alternative route I can go to get near to the school to drop children on my way. Has this been considered? I would like to know about alternative routes for parents who need to drive. I already live 15 minutes' walk away from the school. I am not able to drop them and then walk back to collect my car. Haringey council is making it absolutely impossible to drive anyway in the borough. I am in support of reducing traffic pollution etc on the roads near to the school but how can this be done considering people who are in employment who need to access parking near by to drop children to school and for those children who don't live within the street safe roads. This will be very disruptive and impactful for my family and many others in similar circumstances.
Lancasterian SS12	Object	People drive to school because they have to - if it was walking distance they would walk. Vale school is using vans, they obstruct the roads and pollute too. You won't reduce the air pollution around the school.

Lancasterian SS12	Support	I am really in favour of the school street. At present, cars drive far too fast outside the school, leave engines running and generally make it unsafe for children and dailies trying to get safely to school. The proposed changes will be great outside the school. I do wonder what will happen at the west end of Ruskin Road when people drive up it and then realise (or don't realise!) that they shouldn't enter Birkbeck Road. Will it be clearly signposted to avoid lots of vehicles turning around here to avoid fines?
Lancasterian SS12	Object	The school street being operational in kings road only will cause a nightmare! There are two entrances to the school one on kings road and one on kings street with majority of parents using king Street entrance for the junior school. Now this will only work if you block off king Street as well, there are highly polluting car repair arches inches from the school, and they have cars being worked on all over that street. If you seal off king Street as part of this then yes it's sensible. Although the real issue is why is the council allowing ten massively polluting car repair arches to operate less than 15 feet from the school doors?
Lancasterian SS12	Support	I think it would be beneficial for the health and safety of the kids at the school. But something would need to be suggested to help parents who rely on their cars to get them to school, but the health and safety of the children is what is most important. Firstly I would like to know what happens to the staff that drive to the school? Are they exempt? What about the disabled children that require a car drop off? There needs to be more information to make a decision.
Lancasterian SS12	Support	
Lancasterian SS12	Support	
Lancasterian SS12	Support	
Lancasterian SS12	Support	Need to slow down traffic at zebra crossing on lordship lane. It's fine if there is traffic, and people are going slow but often people are speeding and fail to stop. They will even wave as they go past you even when you are part way across the road which implies that they have seen you and they should be able to stop.
Lancasterian SS12	Object	As someone who is self-employed this proposal will mean losing at least 5hrs a week given that I cannot drop my children to school and leave straight for work also the reverse is true...I would have to stop work at least 30mins earlier than currently to be back in time to collect. During a cost of living crisis this is just not the greatest decision for me personally. Lancs needs a monitor outside during pick up and drop off to prevent certain parents/carers driving and parking like idiots. Its always the same people that cause a problem with their dangerous habits
Lancasterian SS12	Object	
Lancasterian SS12	Object	The kids who are dropped off by car still need to be dropped and the cars will be congested in the surrounding areas. I drop the kids at breakfast club and will still need to drive as my commute requires me to drive so I now need to park further away and it’s going to be more stressful having to walk further to drop the kids off . It would be more helpful if the cut off time was 8.30 in order for me to drop them at the door
Lancasterian SS12	Support	I strongly support the School Street proposal. My children attend this school and I sometimes find it very difficult to cross the road to the gate with them. I have also seen how much the school street has improved the morning drop-off at the Mulberry school, allowing children and parents much more space.
Lancasterian SS12	Object	

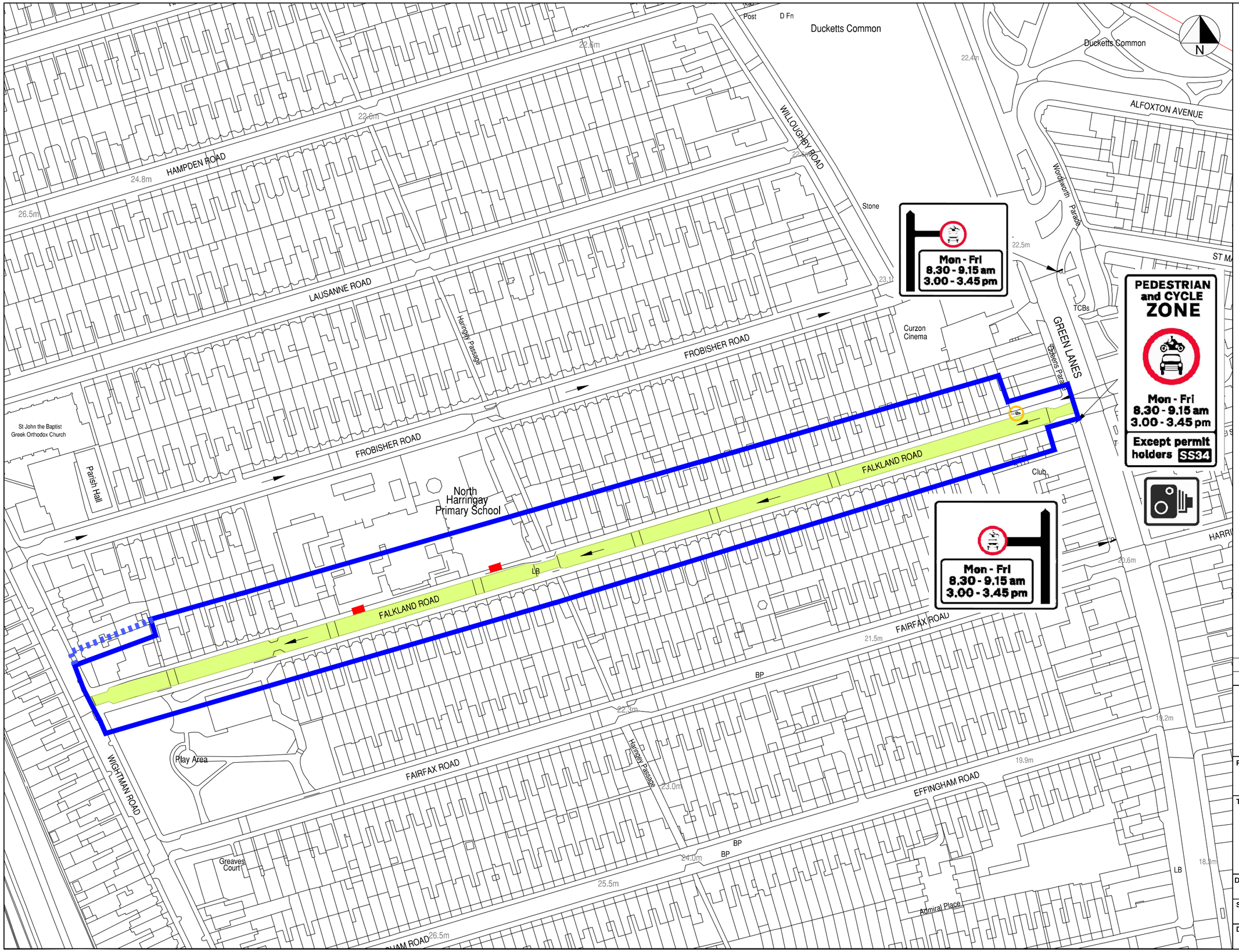
Lancasterian SS12	Object	Subject: Formal Objection to School Street Statutory Consultation - Lancasterian Primary and The Vale School Street (SS12) VVR Motors Ltd 522 King Street, London, N17 8AW 31/10/2023 Haringey Council Traffic Orders. Dear Sir/Madam, I am writing to formally object to the proposed School Street Statutory Consultation for Lancasterian Primary and The Vale School Street (SS12). As the owner of VVR Motors Ltd since 7 years and located at King Street, London, N17 8AW, I have significant concerns regarding the impact this proposal will have on my business and livelihood. My business operates from 08:30 am to 18:00 pm, providing essential services such as a mechanic garage and MOT station to the local community. The proposed School Street measures will severely affect my business financially, as potential customers will be discouraged by the restrictions imposed during these hours. This could lead to a significant loss of clientele, potentially pushing my business towards bankruptcy. I am not only a business owner but also a parent with two children to support and a mortgage to pay. Relying on the success of my business is crucial for my family's financial stability, and this proposal threatens our well-being. It is essential to recognize that there are 11 other businesses on this street, and this proposal could have similarly detrimental effects on their operations. Moreover, the proposal involves closing both roads during the specified hours without providing an alternative access route to King Street. I would like to suggest that the council considers implementing a one-way system while ensuring that at least one road remains open to maintain access to our businesses. Regrettably, I cannot accept the proposed School Street Statutory Consultation in its current form. I urge the council to reconsider this proposal, taking into account the economic consequences it will have on local businesses like mine. I formally register my objection to this proposal and hope that a more equitable solution can be found. I appreciate your attention to this matter and look forward to a fair and considerate resolution.

Lancasterian SS12	Object	To whomever this may concern, I hope this email finds you well. I am the owner of "Top Spray" - 514 King Street N17 8AW, a business that has been serving the community for over 10 years. I am self-employed and work in the area where a school street - the "Vale Primary school" & "Lancasterian Junior & Infant school" school street in particular - is being proposed to be introduced. I work as a car sprayer and car bodywork repair and have done for over 10 years. Over the years, I have served people from Tottenham and beyond with the utmost care and respect, giving them proper service. I am writing to express my concerns regarding the proposed school street initiative in our area and its potential impact on local businesses like mine. First and foremost, I am deeply concerned about the accessibility and parking restrictions that the school street may impose on both me and my customers. I live outside Tottenham and have to commute to this garage, but this proposal affects my commute heavily. These measures are also likely to deter my customers from visiting my garage, leading to a decrease in revenue. If this happens I will be unable to pay my rent and provide for my family. My business, as well as many other businesses in the area, has been an integral part of this community, providing top quality service and ultimately contributing to the local economy. I understand the importance of ensuring the safety of students, but I believe there are alternative solutions that can address this concern without adversely affecting local businesses. Thank you for your attention to this matter. Sincerely,
Lancasterian SS12	Object	Will adversely affect my business, so I'm not happy with the proposal
Lancasterian SS12	Object	I'm a new tenant (business) and I was not informed about the proposal. I have invested a lot in the property and this SS proposal will cause me major loss in both customers and revenue. If the scheme goes ahead I would claim for my financial losses
Lancasterian SS12	Object	I am a self-employed worker and I personally feel like this would hamper my business and therefore I could potentially lose clients because it makes accessibility to my business very difficult
Lancasterian SS12	Object	This will damage my business. I'm self-employed and live 20 mins away. This may be good for some residents but not for the self-employed people working here. My clients will have issues coming here, and so I will suffer.
Lancasterian SS12	Object	This will affect my business badly, as my customers will not be able to visit my workshop. It will drop my financial situation.
Lancasterian SS12	Object	This is very bad for business and could lead to people not coming to my business because it isolates my business and makes it harder for people to get to.
Lancasterian SS12	Other view	The MPS have no concerns with, nor objections to this proposal.

Lancasterian SS12	Object	This will have a terrible impact on staff trying to get to work as many come from outside the local area and public transport is not a reliable option. Especially if you have your own kids to get to school first. This will mean parents picking up children with send from The Vale for hospital appointments, illnesses will be fined. School staff providing outreach visits for children at home will be fined. And nowhere to park with these plans which will create more havoc, congestion and dangerous parking in the areas left. Some people have to use cars
Lancasterian SS12	Support	Why does the proposed area include the whole of Bruce Castle Road, but only the lower half of Birkbeck Rd? This means that drivers will go along Birkbeck rd. and turn right into Ruskin Rd. during the proposed operational hours. Many children and carers cross Ruskin road here when walking to school, and the crossing will be made more dangerous. Regarding safety, the road humps are completely useless, as vehicles routines speed over them. Finally, there is continued rubbish dumping at the corner of Birkbeck and Lordship Lane. This often covers the pavement used by children walking to school. The flats above the shops have nowhere to put rubbish, so the problem may come from there.
Lancasterian SS12	Object	Wasting public money. Stop closing roads.
Lancasterian SS12	Object	Haringey council penalises motorists at every opportunity because, as with the national Labour party, they are full of zealots campaigning against residents who owning / driving cars. You fine them at every opportunity. It's a disgrace. So NO, NO, NO to any further restriction implementations
Lancasterian SS12	Other view	This covers a very wide area. As a cyclist I feel positive as it can be very intimidating cycling up Church Road with cars beeping horns or driving up on the pavements to get past.
Lancasterian SS12	Object	I am not happy about proposed School street my mum lives in Bruce castle road she is a disabled person.
Lancasterian SS12	Support	Good
Lancasterian SS12	Object	
Lancasterian SS12	Support	I would suggest that the hours are extended to factor in clubs / extended day which the school runs.
Lancasterian SS12	Support	The school street area looks comprehensive. However there is a possibility of displacement of traffic onto All Hallows Road and Church Lane on the western side of Bruce Castle Park next to Risley Avenue Primary School. Please implement monitoring before and after this school street is in place to determine whether complimentary measures are required here.
Lancasterian SS12	Support	Radical measures are needed to reverse climate change, so this is welcome.
Lancasterian SS12	Support	Please pass this the roads are not safe for walking kids
Lancasterian SS12	Other view	
Lancasterian SS12	Object	Bad idea
Lancasterian SS12	Object	

Lancasterian SS12	Support	
Lancasterian SS12	Object	I live on Lordship Lane and have a Bruce Castle parking permit. However, I won't Be allowed to use Bruce Castle Rd??? This will be extremely annoying and inconvenient when taking and collecting our children who don't go to Lancasterian school. How is that fair to a local resident? We have to use a one-way system and have no choice. It would be helpful if you could extend the SS slightly to include 26-32 Lordship Lane (as shown on the map), so we can all use the zone. How is it that people as far as Nursery St. will have access to the one way system while we, living closer to the school, will not. Makes no sense.
Lancasterian SS12	Support	I feel very positive about the school street. I would encourage you to make the school street as wide as possible to encourage people to switch form their cars to foot or a bike. If the school street isn't wide people will still drive and park outside the school street - meaning traffic will shift rather than evaporate. Anything encouraging less driving a good thing
Lancasterian SS12	Object	This borough as well as the rest of London has made it impossible to commute. How does a 20 minute drive turn into 1 hour. You've ruined business for us. We used to complete 3 jobs a day and now we're lucky to even get 1. You don't need a traffic restriction near this school. It's nowhere near the main road and doesn't have poor visibility. If you proceed with this you have to pay for my losses during that period because it makes 0 sense. We are struggling as a business as it is. With the recession starting it's become harder to keep a living and adding this restriction will reduce business and the hours to work with clients. It is not necessary for this restriction in such a big area with near to 0 cars moving through it. I don't want this implemented in the area. Thank you.
Lancasterian SS12	Support	As a parent of children at a school that has had a school street in place for many months now, I just wanted to share the many benefits we have experienced: safer walking and cycling (with more people using active travel options), safer crossing for children (many year 6 children walk to school independently), cleaner air, and less stress. I wish there was a school street all the way there.
Lancasterian SS12	Support	My comment is on school streets in the borough in general, not just his one. I support all school streets - I think they are a brilliant idea! And as a walk-when-you-can supporter, I don't drive often though I do have a car. The problem is that because I don't drive often, I have no idea when and where school streets are. I find the signage utterly unhelpful. I realise that it follows all the national regulations, but I don't find those particularly helpful. Please understand, I don't want to drive on a school street, not because of risk of a fine, but because of risk of danger to children. But the signs blend into the noise of black and white and red signs, like speed limit signs and traffic camera signs (if you are driving at 20mph, you can safely ignore these). Isn't there some better way of warning drivers not to drive on a particular street at a particular time?
Lancasterian SS12	Support	The school street will make it significantly safer to walk and cycle in the area around the school.
564	564	564

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Key:

- Existing one-way direction
- Existing school gate entrance
- Proposed sign on existing lighting column
- Proposed ANPR camera on existing lighting column
- Proposed School Street
- Proposed sign on proposed post
- Properties eligible for a School Street exemption permit

Notes:

1. Drawing is based on OS base, dimensions and street furniture positions to be checked on site by the Contractor.
2. Not all road markings are shown.
3. Signs to be mounted with anti-rotational fixings at 2.3m minimum height.
4. Posts to be 76mm or 89mm as specified on drawing.

General Notes:

1. All dimension are in metres, unless otherwise noted.
2. Do not scale off plan.
3. This drawing is to be read in conjunction with all other relevant drawings and specifications.
4. Temporary traffic works must be undertaken in accordance with Chapter 8 parts 1 & 2 of the Traffic Signs Manual, Safety at Street Works and Road Works Code of Practice 2013 and any other relevant H&S legislation.
5. All works shall be carried out in accordance with LB Haringey statutory authority and health & safety requirements and regulations.

Haringey LONDON
5th Floor, Alexandra House, 10 Station Road, Wood Green, London N22 7TR
Tel: 020 8489 0000 Fax: 020 8489 1251
Director of Environment & Neighbourhoods: Barry Francis

Project: SCHOOL STREET

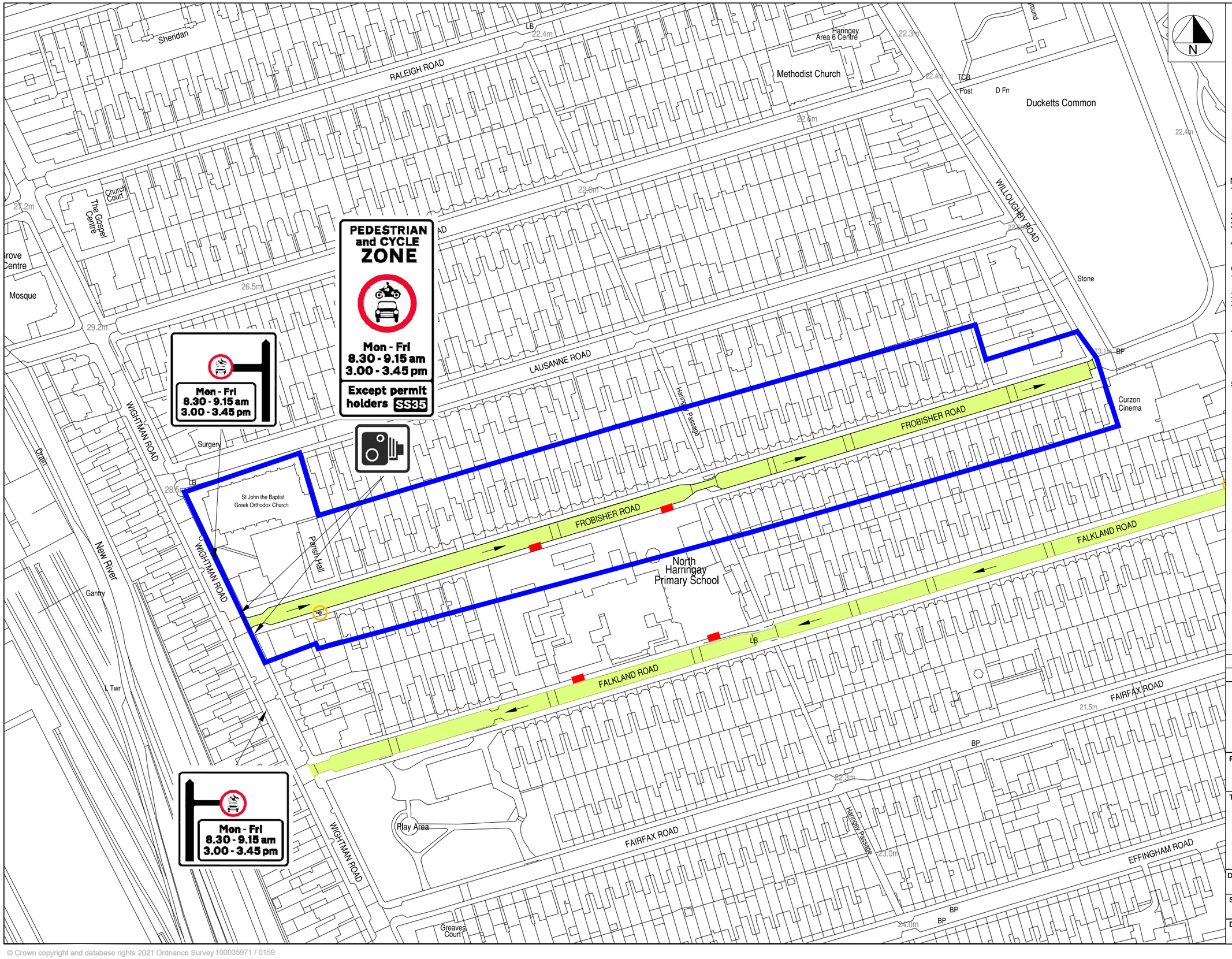
Title: SS34 NORTH HARRINGAY FALKLAND ROAD

Drawn: Check: Appr: Date: Aug 2023 Scale at A3: NTS

Status:

Drawing No: Revision:

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Key:

- Existing one-way direction
- Existing school gate entrance
- Proposed sign on existing lighting column
- Proposed ANPR camera on existing lighting column
- Proposed School Street
- Proposed sign on proposed post
- Properties eligible for a School Street exemption permit

Notes:

1. Drawing is based on OS base, dimensions and street furniture positions to be checked on site by the Contractor.
2. Not all road markings are shown.
3. Signs to be mounted with anti-rotational fixings at 2.3m minimum height.
4. Posts to be 76mm or 89mm as specified on drawing.

General Notes:

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Tel: 020 8489 0000 **Fax:** 020 8489 1251
Director of Environment & Neighbourhoods: Barry Francis

Project: SCHOOL STREET

Title: SS35 NORTH HARRINGAY FROBISHER ROAD

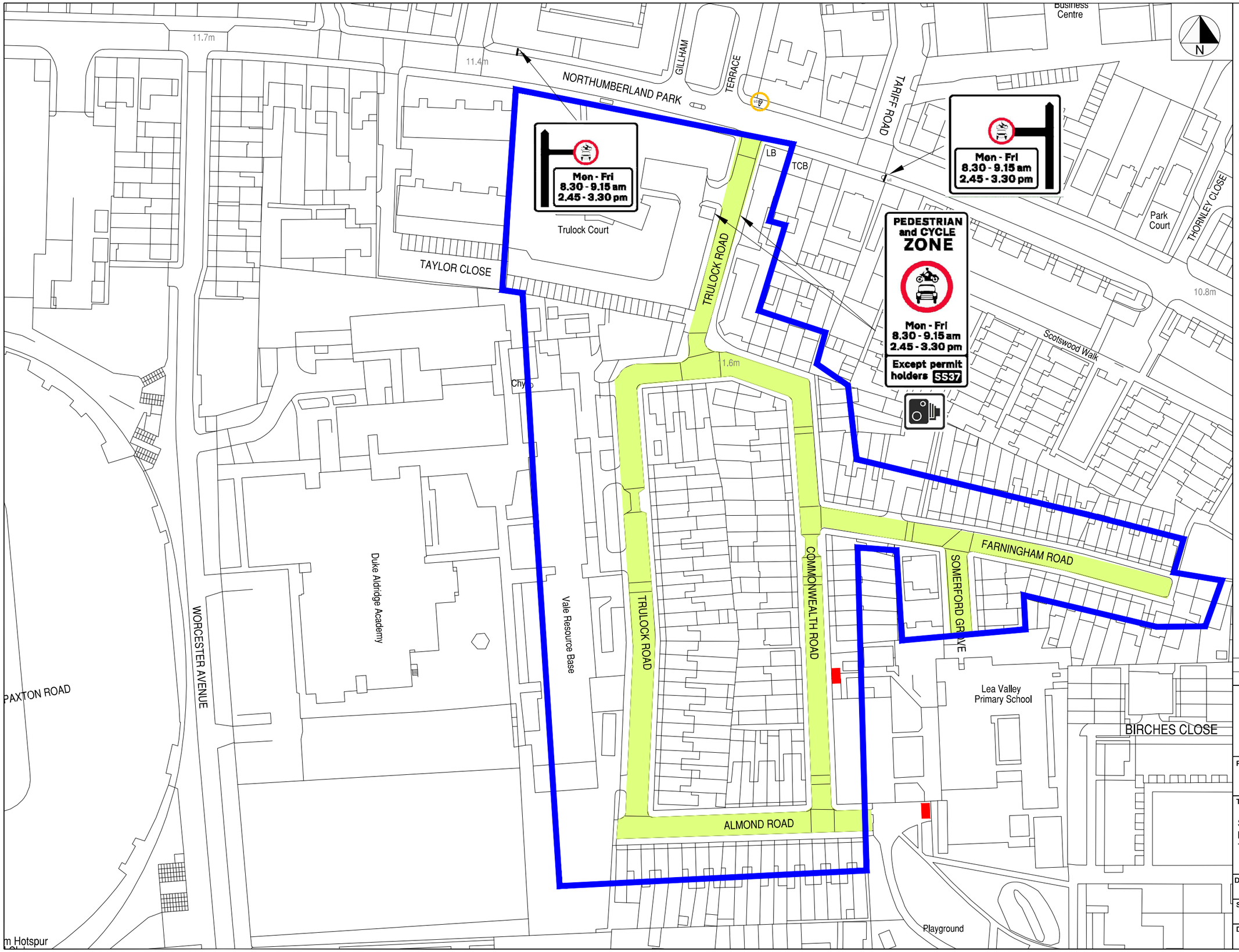
Drawn:	Check:	Appr:	Date:	Scale at A3:
			Aug 2023	NTS

Status:

Drawing No:

Revision:

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Key:

- Existing one-way direction
- Existing school gate entrance
- Proposed sign on existing lighting column
- Proposed ANPR camera on existing lighting column
- Proposed School Street
- Proposed sign on proposed post
- Properties eligible for a School Street exemption permit

Notes:

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Director of Environment & Neighbourhoods: Barry Francis

Project: SCHOOL STREET

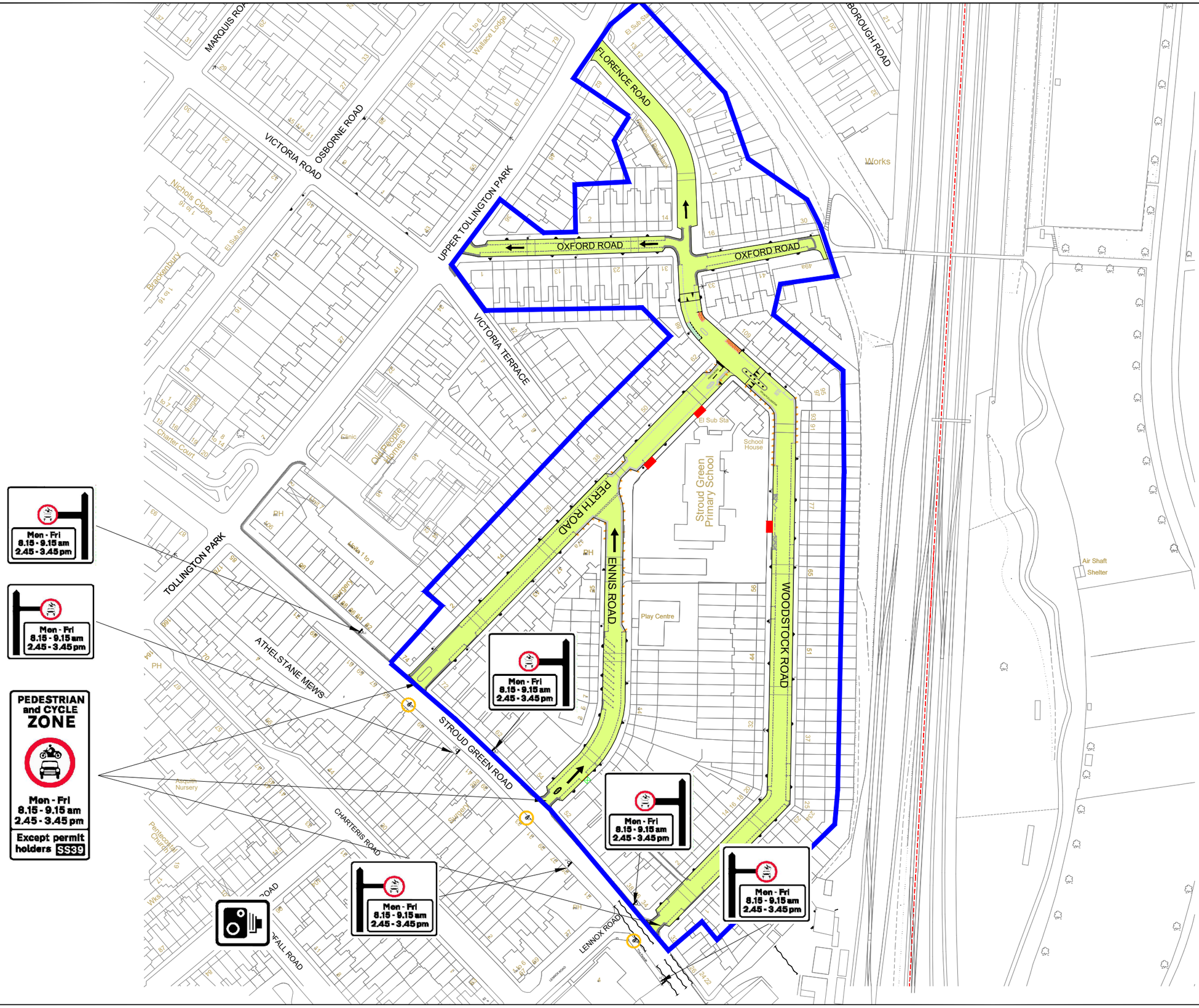
Title: SS37 LEA VALLEY PRIMARY SCHOOL, DUKES ALDRIDGE ACADEMY AND THE VALE SECONDARY RESOURCE

Drawn:	Check:	Appr:	Date:	Scale at A3:
			Aug 2023	NTS

Status: SCHOOL STREET

Drawing No: | Revision:

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Key:

- Existing one-way direction
- Existing school gate entrance
- Proposed sign on existing lighting column
- Proposed ANPR camera on existing lighting column
- Proposed School Street
- Proposed sign on proposed post
- Properties eligible for a School Street exemption permit

Notes:

1. Drawing is based on OS base, dimensions and street furniture positions to be checked on site by the Contractor.
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4. Posts to be 76mm or 89mm as specified on drawing.

General Notes:

1. All dimension are in metres, unless otherwise noted.
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5. All works shall be carried out in accordance with LB Haringey statutory authority and health & safety requirements and regulations.

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Director of Environment & Neighbourhoods: Barry Francis

Project: SCHOOL STREET

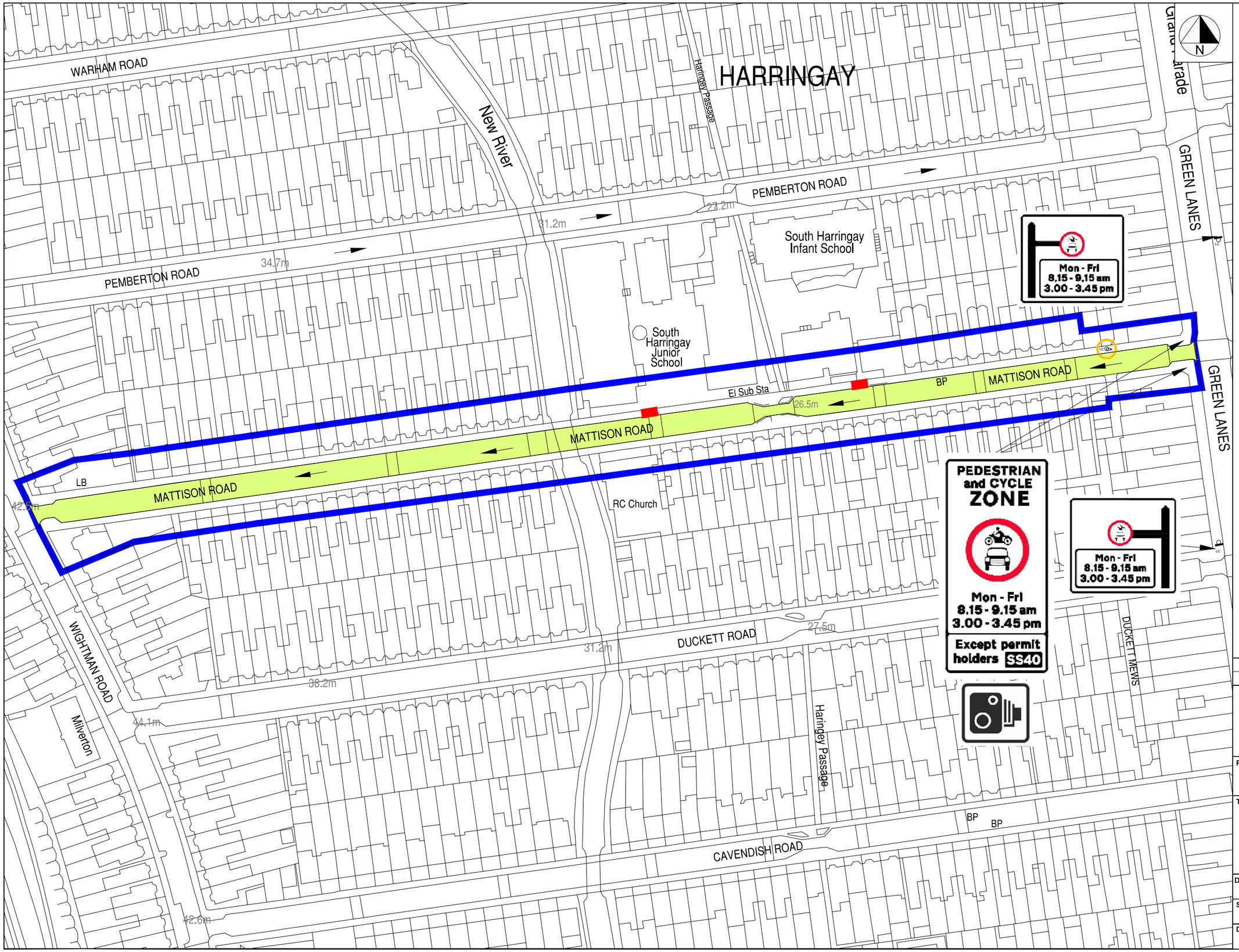
Title: SS39 STROUD GREEN PRIMARY SCHOOL

Drawn: Check: Appr: Date: Aug 2023 Scale at A3:

Status: SCHOOL STREET

Drawing No: Revision:

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Key:

- Existing one-way direction
- Existing school gate entrance
- Proposed sign on existing lighting column
- Proposed ANPR camera on existing lighting column
- Proposed School Street
- Proposed sign on proposed post
- Properties eligible for a School Street exemption permit

Notes:

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5. All works shall be carried out in accordance with LB Haringey statutory authority and health & safety requirements and regulations.

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Tel: 020 8489 0000 **Fax:** 020 8489 1251
Director of Environment & Neighbourhoods: Barry Francis

Project: SCHOOL STREET

Title: SS40 SOUTH HARRINGAY MATTISON ROAD

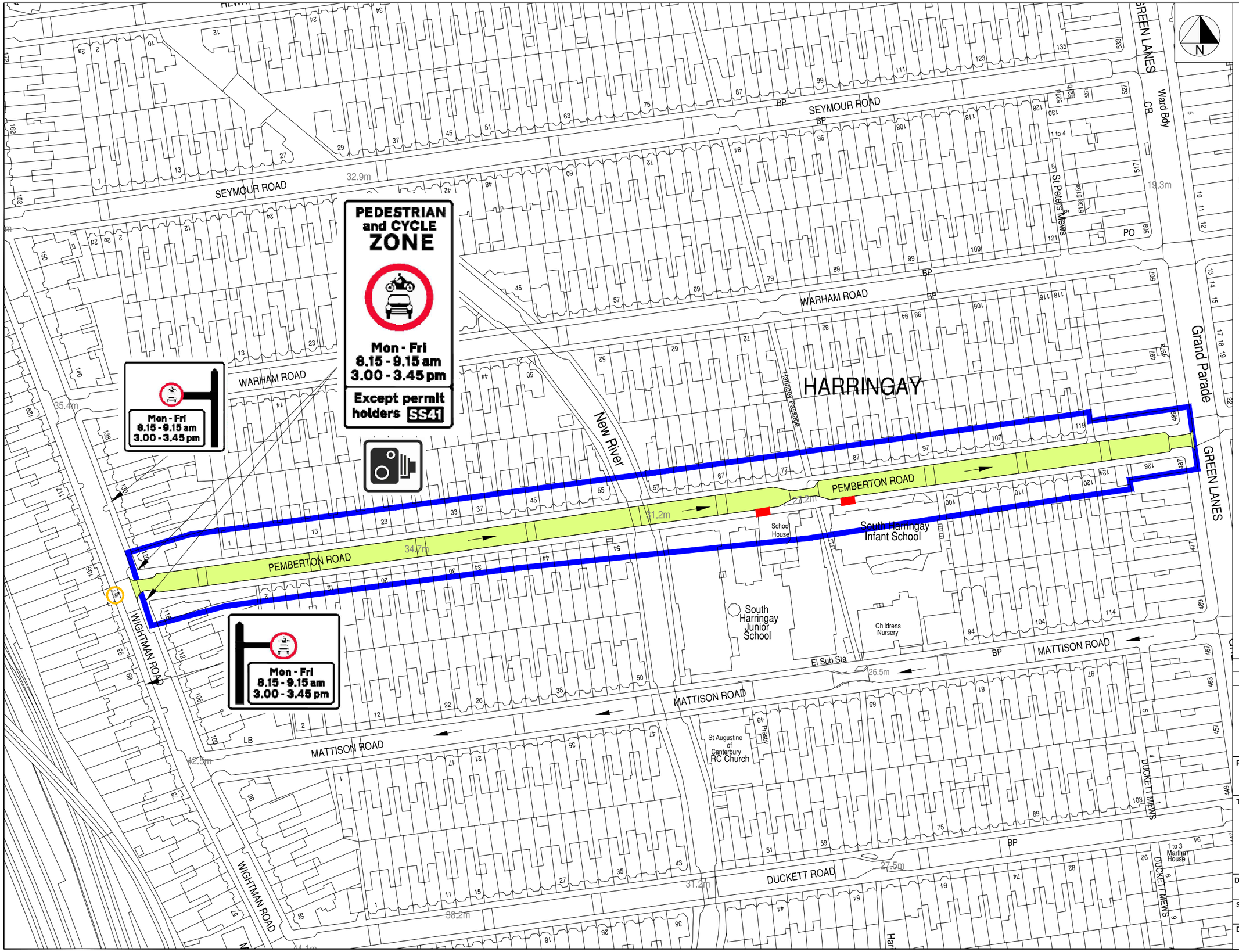
Drawn:	Check:	Appr:	Date:	Scale at A3:
			Aug 2023	NTS

Status: SCHOOL STREET

Drawing No:

Revision:

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Key:

- Existing one-way direction
- Existing school gate entrance
- Proposed sign on existing lighting column
- Proposed ANPR camera on existing lighting column
- Proposed School Street
- Proposed sign on proposed post
- Properties eligible for a School Street exemption permit

Notes:

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Director of Environment & Neighbourhoods: Barry Francis

Project: SCHOOL STREET

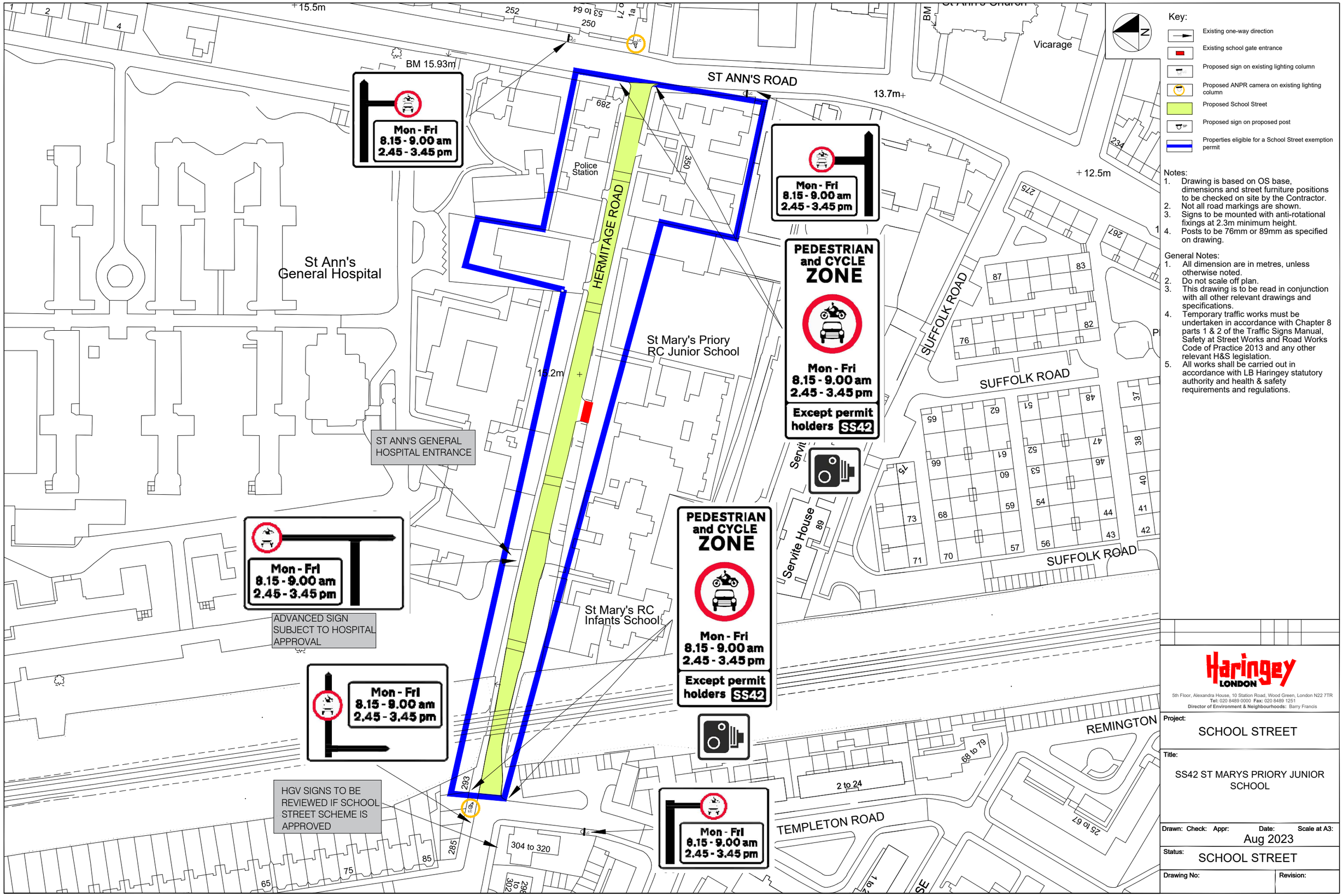
Title: SS41 SOUTH HARRINGAY PEMBERTON ROAD

Drawn:	Check:	Appr:	Date:	Scale at A3:
			Aug 2023	NTS

Status: SCHOOL STREET

Drawing No: | Revision:

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Notes:
1. Drawing is based on OS base, dimensions and street furniture positions to be checked on site by the Contractor.
2. Not all road markings are shown.
3. Signs to be mounted with anti-rotational fixings at 2.3m minimum height.
4. Posts to be 76mm or 89mm as specified on drawing.

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5. All works shall be carried out in accordance with LB Haringey statutory authority and health & safety requirements and regulations.

Haringey LONDON
5th Floor, Alexandra House, 10 Station Road, Wood Green, London N22 7TR
Tel: 020 8489 0000 **Fax:** 020 8489 1251
Director of Environment & Neighbourhoods: Barry Francis

Project: SCHOOL STREET

Title: SS42 ST MARYS PRIORY JUNIOR SCHOOL

Drawn:	Check:	Appr:	Date:	Scale at A3:
			Aug 2023	

Status: SCHOOL STREET

Drawing No: | **Revision:**

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Mon - Fri
8 - 9 am
2.45 - 3.30 pm

Mon - Fri
8 - 9 am
2.45 - 3.30 pm

PEDESTRIAN and CYCLE ZONE

Mon - Fri
8 - 9 am
2.45 - 3.30 pm

Except permit holders SS43

Mon - Fri
8 - 9 am
2.45 - 3.30 pm

Mon - Fri
8 - 9 am
2.45 - 3.30 pm

NIGHTINGALE LANE

RECTORY GARDENS

THE CAMPSBOURNE

PRIORY ROAD

OAK AVE

HIGH STREET

ST MARY'S ROAD

THE GARDENS

Bowling Green
Pavilion
Hornsey Bowling Club

Croquet Lawn

St Mary's CE
Primary School

TA Centre

Camfrey
Court

Playground

The Rectory Gardens

Mackenzie
House

Stowell
House

Campsbourne
House

Palace Gates Mews

Campsbourne
Hall

Campsbourne
Baptist Church

El Sub Sta

Shelter

Shelter

Priory Cottage

PH

BM 30.49m

30.5m

30.8m

29.9m

30.2m

31.7m

TCB

N

Key:

- Existing one-way direction
- Existing school gate entrance
- Proposed sign on existing lighting column
- Proposed ANPR camera on existing lighting column
- Proposed School Street
- Proposed sign on proposed post
- Properties eligible for a School Street exemption permit

Notes:

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Director of Environment & Neighbourhoods: Barry Francis

Project: SCHOOL STREET

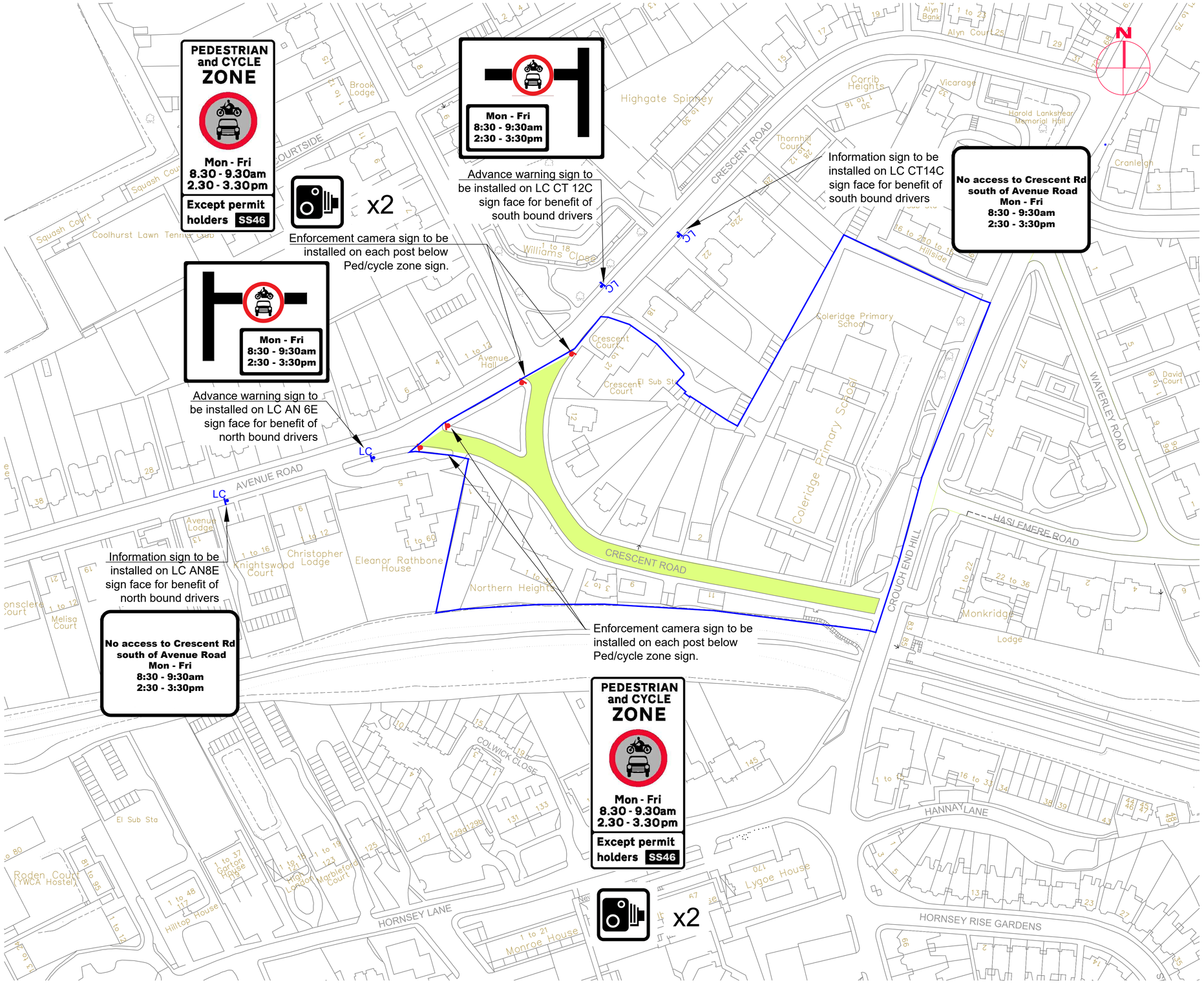
Title: SS43 ST MARY'S CE PRIMARY SCHOOL

Drawn: Check: Appr: Date: Aug 2023 Scale at A3: NTS

Status: SCHOOL STREET

Drawing No: Revision:

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NOTES:

- Proposed School Street
- Proposed cycle/ped zone sign & post
- Properties eligible for a school street exemption permit
- LC Existing lamp column

SS46

N

Rev	Description	Checked	Date
*			

Project: School Street Batch 1c

Title: Coleridge Primary School Crescent Road extension

Path: S:\ENv\Strt\Scrn\High\Srv\FA\IF\Sustainable Transport\TPP Group\.....

Designed: | Drawn: | Checked:

Scale: 1:500 @A3 | Date Drawing Created:

Drg. No: RJHWP | Rev: -

ENVIRONMENT & NEIGHBOURHOODS
5th Floor, Alexandra House, 10 Station Road, Wood Green, London N22 7TR
Tel: 020 8489 0000 Fax: 020 8489 1251
Director Place and Sustainability: Lyn Garner
www.haringey.gov.uk

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Appendix G – School Street exemption policy

This document is intended to summarise the approved exemption policy set out in paragraphs 6.44 to 6.59 of the School Street Plan which is detailed, as standard, within the borough's traffic orders for School Streets.

1. Automatically exempt by way of the traffic order and traffic signs:
    a. Any vehicle leaving the prescribed zone;
    b. Any motor vehicle when used for fire brigade, ambulance or police purposes;
    c. Any motor vehicle when used by Hatzolah north west ambulance service or any other private ambulance services with written permission of the Council.
    d. Anything done with the permission or at the direction of a police constable in uniform;
    e. Any motor vehicle when used in the service of a local authority in pursuance of statutory powers or duties provided that in all the circumstances it is reasonably necessary in the exercise of such powers or performance of such duties for the that motor vehicle to enter the prescribed zone;
    f. Any Royal Mail motor vehicle being used in pursuance of statutory functions;
    g. Any motor vehicles being used in connection with the maintenance, improvement, reconstruction, cleansing or lighting of the prescribed zone or any road accessible only therefrom, or the laying, erection, alteration or repair of any sewer thereunder or of any main, pipe or apparatus for the supply of gas, water or electricity or of any telecommunications system thereunder or thereon, or the placing, maintenance or removal of any traffic sign thereof provided that in all the circumstances it is reasonably necessary in the exercise of such powers or performance of such duties for the that motor vehicle to enter the prescribed zone

2. Subject to an online application, a virtual exemption permit may be issued to:
    a. Any residents or businesses within the School Street (maximum 2 per property)
    b. Any motor vehicle owned by disabled person who has been issued a valid disabled person's badge who requires access to a property within the prescribed zone;
    c. Any motor vehicle when used by qualified medical practitioners attending to provide critical care to residents within the prescribed zone;
    d. Any motor vehicle used in the transport of children and adults with special access needs in connection with and support of the school
    e. School staff (to maximum of 10% of the total number of staff at that school). In addition, any staff who are blue badge holders may apply for an exemption when the school has provided parking for those holders.

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THE GAZETTE
OFFICIAL PUBLIC RECORD

Published by Authority | Est 1665

Notice details

Type:
Transport
> Road Traffic Acts

Publication date:
22 November 2023, 12:01

Edition:
The London Gazette

Notice ID:
4492480

Notice code:
1501

Issue number:
64238

Page number:
23664

About Road Traffic Acts notices

Road Traffic Acts

HARINGEY COUNCIL

PROPOSED SCHOOL STREET – NORTH HARRINGAY PRIMARY SCHOOL, LEA VALLEY PRIMARY SCHOOL, STROUD GREEN PRIMARY SCHOOL, SOUTH HARRINGAY JUNIOR SCHOOL, ST MARYS PRIORY RC JUNIOR SCHOOL, ST MARYS CE PRIMARY SCHOOL, COLERIDGE PRIMARY SCHOOL

THE HARINGEY (MOVING TRAFFIC RESTRICTIONS) (HARINGEY) (NO. ***) ORDER 202*

T10

1. Notice is hereby given that the Council of the London Borough of Haringey proposes to make the above mentioned Orders under sections 6 and 124 of and Part IV of Schedule 9 to the Road Traffic Regulation Act 1984, as amended:

2. The general effect of orders will be to introduce:-

(a) School Street Zone SS34 - North Harringay Primary School: Timed pedestrian and cycle zones in which motor vehicles, except for those issued a permit would be prohibited from entering, Mon-Fri 8:30-9.15am 3.00-3.45pm during school term times and when the appropriate signs are on display on the following road:

Falkland Road N8: From its junction with Wightman Road to its junction with Green Lanes.

Those eligible for permits include properties and residents of Falkland Road N8 (all properties), 1 Queens Parade, Green Lanes N8, 256 Wightman Road N8, Medical practitioners attending those residing in the zone, disabled badge holders who reside outside the zone but require essential access and school buses and vehicles used in the transport of children and adults with special access needs in relation to North Harringay Primary School within the zone. All vehicles will be allowed to exit the zone whilst it is in operation.

(b) School Street Zone SS35 - North Harringay Primary School: Timed pedestrian and cycle zones in which motor vehicles, except for those issued a permit would be prohibited from entering, Mon-Fri 8:30-9.15am 3.00-3.45pm during school term times and when the appropriate signs are on display on the following road:

Frobisher Road N8: From its junction with Wightman Road to its junction with Willoughby Road.

Those eligible for permits include properties and residents of 1-111 Frobisher Road N8 (odd), 2-90 Frobisher Road N8 (even), 270 Wightman Road N8, Greek Orthodox Church of St John the Baptist, 1 Willoughby Road N8, North Harringay Primary School, Falkland Road N8, Medical practitioners attending those residing in the zone, disabled badge holders who reside outside the zone but require essential access and school buses and vehicles used in the transport of children and adults with special access needs in relation to North Harringay Primary School within the zone. All vehicles will be allowed to exit the zone whilst it is in operation.

(c) School Street Zone SS37 – Lea Valley Primary School: Timed pedestrian and cycle zones in which motor vehicles, except for those issued a permit would be prohibited from entering, Mon-Fri 8:30-9.15am 2.45-3.30pm during school term times and when the appropriate signs are on display on the following road:

Trulock Road N17: From its junction with Northumberland Park to its junction with Almond Road.

Almond Road N17: From its junction with Trulock Road for its entire length.

Commonwealth Road N17: From its junction with Trulock Road to its junction with Almond Road.

Somerford Grove N17: From its junction with Farningham Road for its entire length.

Farningham Road N17: From its junction with Commonwealth Road for its entire length.

Those eligible for permits include properties and residents of Almond Road N17 (all properties), Commonwealth Road N17 (all properties), Farningham Road N17 (all properties), Somerford Grove N17 (all properties), Trulock Road N17 (all properties), Medical practitioners attending those residing in the zone, disabled badge holders who reside outside the zone but require essential access and

school buses and vehicles used in the transport of children and adults with special access needs in relation to Lea Valley Primary School within the zone. All vehicles will be allowed to exit the zone whilst it is in operation.

(d) School Street Zone SS39 – Stroud Green Primary School: Timed pedestrian and cycle zone in which motor vehicles, except for those issued a permit would be prohibited from entering, Mon-Fri 8:15-9.15am 2.45-3.45pm during school term times and when the appropriate signs are on display on the following road:

Florence Road N4: From its junction with Upper Tollington Park to its junction with Woodstock Road.

Woodstock Road N4: From its junction with Florence Road to its junction with Stroud Green Road.

Perth Road N4: From its junction with Woodstock Road to its junction with Stroud Green Road.

Ennis Road N4: From its junction with Stroud Green Road to its junction with Perth Road.

Oxford Road N4:

i) From its junction with Woodstock Road to its junction with Upper Tollington Road.

ii) From its junction with Woodstock Road, east for its entire length.

Those eligible for permits include properties and residents of Florence Road N4 (all properties), Oxford Road N4 (all properties), Perth Road N4 (all properties), Ennis Road N4 (all properties), Woodstock Road N4 (all properties), 36 Upper Tollington Park N4 (all flats), 62 Upper Tollington Park N4 (all flats), 32-74 Stroud Green Road N4 (evens), Medical practitioners attending those residing in the zone, disabled badge holders who reside outside the zone but require essential access and school buses and vehicles used in the transport of children and adults with special access needs in relation to Stroud Green Primary School within the zone. All vehicles will be allowed to exit the zone whilst it is in operation.

(e) School Street Zone SS40 - South Harringay Junior School: Timed pedestrian and cycle zones in which motor vehicles, except for those issued a permit would be prohibited from entering, Mon-Fri 8:15-9.15am 3.00-3.45pm during school term times and when the appropriate signs are on display on the following road:

Mattison Road N4: From its junction with Wightman Road to its junction with Green Lanes. ,

Those eligible for permits include properties and residents of Mattison Road N4 (all properties), Hornsey County School Pemberton Road, South Harringay Infants School Pemberton Road, 96 Wightman Road N4 (all flats), 100 Wightman Road N4 (all flats), 5 Duckett Mews N4, 7 Duckett Mews N4, 467 – 469 Green Lanes (odd), Medical practitioners attending those residing in the zone, disabled badge holders who reside outside the zone but require essential access and school buses and vehicles used in the transport of children and adults with special access needs in relation to South Harringay Junior School within the zone. All vehicles will be allowed to exit the zone whilst it is in operation.

(f) School Street Zone SS41 - South Harringay Junior School: Timed pedestrian and cycle zones in which motor vehicles, except for those issued a permit would be prohibited from entering, Mon-Fri 8:15-9.15am 3.00-3.45pm during school term times and when the appropriate signs are on display on the following road:

Pemberton Road N4: From its junction with Wightman Road to its junction with Green Lanes.

Those eligible for permits include properties and residents of Pemberton Road N4 (all properties), 487-489 Green Lanes N4 (odd), South Harringay Junior School, Mattison Road N4, The Ladder Play Centre, Mattison Road N4, 118-120 Wightman Road N4 (even), Medical practitioners attending those residing in the zone, disabled badge holders who reside outside the zone but require essential access and school buses and vehicles used in the transport of children and adults with special access needs in relation to South Harringay Junior School within the zone. All vehicles will be allowed to exit the zone whilst it is in operation.

(g) School Street Zone SS42 – St Marys Priory RC Junior School: Timed pedestrian and cycle zone in which motor vehicles, except for those issued a permit would be prohibited from entering, Mon-Fri 8:15-9.00am 2.45-3.45pm during school term times and when the appropriate signs are on display on the following road:

Hermitage Road N15: From its junction with St Anns Road to its junction with Templeton Road.

Those eligible for permits include properties and residents of 293 Hermitage Road N15, 295A-E Hermitage Road N15, Fawn House, 297 Hermitage Road N15 (all flats), Auburn House, 299 Hermitage Road N15 (all flats), Peregrine House, 350 Hermitage Road N15, St Marys Catholic School, The Federation of St Mary's Priory Catholic Schools, 289 St Anns Road Police Station, Medical practitioners attending those residing in the zone, disabled badge holders who reside outside the zone but require essential access and school buses and vehicles used in the transport of children and adults with special access needs in relation to St Marys Priory RC Junior School within the zone. All vehicles will be allowed to exit the zone whilst it is in operation.

(h) School Street Zone SS43 – St Marys CE Primary School: Timed pedestrian and cycle zone in which motor vehicles, except for those issued a permit would be prohibited from entering, Mon-Fri 8:00-9.00am 2.45-3.30pm during school term times and when the appropriate signs are on display on the following road:

Rectory Gardens N8: From its junction with Nightingale Lane to its junction with High Street.

Those eligible for permits include properties and residents of Rectory Gardens (all properties), 22-24 Nightingale Lane N8 (even), 1-5 The Gardens N8 (all properties), St Marys Church of England Junior School, Medical practitioners attending those residing in the zone, disabled badge holders who reside outside the zone but require essential access and school buses and vehicles used in the transport of children and adults with special access needs in relation to St Marys CE Primary School within the zone. All vehicles will be allowed to exit the zone whilst it is in operation.

(i) School Street Zone SS46 – Coleridge Primary School: Timed pedestrian and cycle zone in which motor vehicles, except for those issued a permit would be prohibited from entering, Mon-Fri 8:30-9.30am 2.30-3.30pm during school term times and when the appropriate signs are on display on the following road:

Crescent Road N8: From its junction with Avenue Road to its junction with Crouch End Hill.

Those eligible for permits include properties and residents of 1 Avenue Road N8 (all flats), 2-12 Crescent Road N8 (all properties), Coleridge Primary School, 1-21 Crescent Court, Crescent Road (all flats), 1-32 Northern Heights, Crescent Road (all flats), Medical practitioners attending those residing in the zone, disabled badge holders who reside outside the zone but require essential access and school buses and vehicles used in the transport of children and adults with special access needs in relation to Coleridge Primary School within the zone. All vehicles will be allowed to exit the zone whilst it is in operation.

3. A copy of the proposed Orders, a copy of this notice, a copy of the Council's statement of reasons for making the proposed Orders and plan(s) showing the locations and effects of the Orders can be viewed via the online consultation portal https://consultation.appyway.com/haringey Alternatively, an appointment can be made, by emailing traffic.orders@haringey.gov.uk to inspect these documents during normal office hours at the reception desk of Alexandra House, 10 Station Road, Wood Green, N22 7TR. Appointments to inspect the documents will be available until the end of a period of 6 weeks from the date on which the Orders are made or the Council decides not to make the Orders.

4. Any person wishing to object to the proposed Orders or make other representation should send grounds for their objection via the online portal https://consultation.appyway.com/haringey or alternatively email traffic.orders@haringey.gov.uk or write to Parking Team, Alexandra House, 4th floor, 10 Station Road, Wood Green, N22 7TR quoting reference 2023-T10, by 13th December 2023.
Dated: 22nd November 2023

Ann Cunningham, Head of Highways & Parking

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THE GAZETTE
OFFICIAL PUBLIC RECORD

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About Road Traffic Acts notices

Road Traffic Acts

HARINGEY COUNCIL

PROPOSED SCHOOL STREET – VALE PRIMARY SCHOOL, LANCASTERIAN JUNIOR AND INFANT SCHOOL

THE HARINGEY (MOVING TRAFFIC RESTRICTIONS) (AMENDMENT NO. ***) ORDER 202*

THE HARINGEY (CHARGED-FOR PARKING PLACES) (AMENDMENT NO. ***) ORDER 202*

THE HARINGEY (FREE PARKING PLACES, LOADING PLACES AND WAITING, LOADING AND STOPPING RESTRICTIONS) (AMENDMENT NO.***) ORDER 202*

T52

1. Notice is hereby given that the Council of the London Borough of proposes to make the above mentioned Order under sections 6, 45, 46, 49 and 124 of and Part IV of Schedule 9 to the Road Traffic Regulation Act 1984, as amended:

2. The general effect of order will be to introduce:-

(a) School Street Zone SS12 – Vale Primary School, Lancasterian Junior and Infant School: Timed pedestrian and cycle zones in which motor vehicles, except for local buses and those issued a permit would be prohibited from entering, Mon-Fri 8.15-9.15am 2.45-3.45pm during school term times and when the appropriate signs are on display on the following roads:

Birkbeck Road N17: From the northern kerb of Ruskin Road to its junction with Kings Road.

Bruce Castle Road N17: Entire length between Kings Road and Lordship Lane.

Church Road N17: From a point 7 metres east of the eastern kerb of Beaufoy Road to the existing prohibition of motor vehicles filter underneath the viaduct.

Kings Road N17: Entire length between New Road and James Place/Chapel Stones.

King Street N17: Entire length between Church Road and Kings Road.

New Road N17: From its junction with Church Road, south for 33 metres to the existing bollards.

Nursery Street N17: From its junction with Tebworth Road for its entire length.

Tebworth road N17: From its junction with Church Road for its entire length.

Those eligible for permits include properties and residents of 71 - 95 Birkbeck Road N17 (odd), 72 - 96 Birkbeck Road N17 (evens), Bruce Castle Road N17 (all properties), Kings Road N17 (all properties), King Street N17 (all properties & units), Tebworth Road N17 (all properties), Nursery Street N17 (all properties), Nursery Court N17 (all properties), 66 – 136 Church Road N17 (evens), 83 Church Road N17, 4 Point 2 Motors Railway Arches 528 Church Road N17, 26 & 38 Lordship Lane N17, Medical practitioners attending those residing in the zone, disabled badge holders who reside outside the zone but require essential access and school buses and vehicles used in the transport of children and adults with special access needs in relation to Vale Primary School, Lancasterian Junior and Infant School within the zone. All vehicles will be allowed to exit the zone whilst it is in operation

. (b) To replace the Permit holders parking bays and single yellow line with double yellow lines on the north side of Church Road between its junction with Cemetery Road and Beaufoy Road.

3. A copy of the proposed Orders, a copy of this notice, a copy of the Council's statement of reasons for making the proposed Orders and plan(s) showing the locations and effects of the Orders can be viewed via the online consultation portal https://consultation.appyway.com/haringey Alternatively, an appointment can be made, by emailing traffic.orders@haringey.gov.uk to inspect these documents during normal office hours at the reception desk of Alexandra House, 10 Station Road, Wood Green, N22 7TR. Appointments to inspect the documents will be available until the end of a period of 6 weeks from the date on which the Orders are made or the Council decides not to make the Orders.

4. Any person wishing to object to the proposed Orders or make other representation should send grounds for their objection via the online portal https://consultation.appyway.com/haringey or alternatively email traffic.orders@haringey.gov.uk or write to Parking Team, Alexandra House, 4th floor, 10 Station Road, Wood Green, N22 7TR quoting reference 2023-T52 by 15th November 2023.

Dated 25th October 2023

Ann Cunningham, Head of Highways & Parking

22 November 2023

Statutory consultation
North Harringay Primary School Street (SS34 and SS35)

Dear resident, business or stakeholder,

I am writing to provide you with information about a School Street that has been approved for your area, subject to the outcome of this statutory consultation.

Background to this project

In December 2022, we carried out an informal consultation on the initial design of a School Street and sought feedback on that design from residents, businesses, the school community and stakeholders.

Following that consultation, a decision was taken to implement the School Street project subject to the outcome of statutory (traffic orders) consultation. You can read the report and the reasons for that decision online here[1] https://shorturl.at/cjrxX

What is a School Street?

School Streets transform roads outside schools, so that pedestrians and cyclists are prioritised at school start and finish times.

They reduce road danger, improve air quality and tackle congestion near the school gates, making it easier and safer to walk and cycle to school.

They create a more pleasant environment for everyone, while making sure immediately affected residents and business motorists, pedestrians and cyclists can use the road.

Why School Streets?

The council is committed to tackling our climate emergency and the escalating levels of pollution at peak times on our road network. Childhood obesity in the borough is also one of the highest in London.

The council adopted the School Streets Plan to address these issues and support the promise to improve the lives of our residents as described in our 2023/24 Corporate Delivery Plan.

How do they work?

The streets around a school temporarily become a Pedestrian and Cycle Zone at set times in the morning and afternoon, usually for 1 to 1.5 hours at the start and end of the school day, Monday to Friday and during term time only. The times proposed for this School Street are shown on the enclosed plan.

Motor vehicles are not permitted to enter the zone during these times unless they have been granted an exemption. Residents and businesses immediately affected can apply for exemptions, giving them the ability to drive into the School Street if needed. Emergency service vehicles have access at all times.

Exemptions are applied ‘virtually’ and enforced by camera. This means those motorists with an exemption, including emergency services, have unhindered access to the road network. Motor vehicles that enter without a valid exemption may be issued a Penalty Charge Notice.

Benefits of a School Street

School Streets create a safer street for people at school drop-off and pick-up times, by:

- Reducing traffic volumes outside the school, which reduces emissions and improves air quality
- Making it safer to walk, cycle, scoot, and wheel to school. Children will benefit from increased physical activity on their journey to and from school
- Reducing traffic congestion and parking problems outside the school and reducing road danger

[1] https://www.minutes.haringey.gov.uk/ieDecisionDetails.aspx?id=2966&LLL=0

EXAMPLE LETTER

Who is eligible for a School Street exemption?

If the School Street is given final approval in the new year, the following groups would be eligible to apply for a free motor vehicle exemption:

- Residents or businesses who have an address within the School Street (see note below) to a maximum of two per property
- Blue Badge holders who require access to the School Street
- Pupils with a disability that prevents them walking or cycling to school
- Medical practitioners visiting someone with an address in the School Street
- School vehicles (eg vehicles used for school trips and some staff)

Note: properties within the boundary of the School Street would be eligible for a resident or business School Street exemption. Those properties are outlined in blue on the enclosed plan.

Motor vehicles without an exemption (including visitors, tradespeople or delivery drivers) are not permitted to drive into the School Street during operational times. However, no exemption is required to drive out of a School Street, eg. vehicles that were already parked when it came into operation.

Statutory (traffic order) consultation

In accordance with national regulations, the council must consult upon proposed traffic orders prior to implementation.

A copy of the proposed plan is enclosed with this letter. The proposed Orders and associated documents can be viewed at https://consultation.appyway.com/haringey. Alternatively, an appointment can be made, by emailing traffic.orders@haringey.gov.uk to inspect these documents during normal office hours.

Any person wishing to object to the proposed Orders or make other representation should send grounds for their objection via the online portal https://consultation.appyway.com/haringey or alternatively email traffic.orders@haringey.gov.uk or write to Traffic Management Group, Alexandra House, 4th floor, 10 Station Road, Wood Green, N22 7TR quoting reference 2023-T10, by 13 December 2023.

What happens next?

Once the consultation has closed, a report will be considered by the council's Cabinet. This decision is expected early in 2024. If the School Street is approved, we expect to implement the School Street in spring 2024.

Before any School Street launches, we will write to all eligible properties explaining how to apply for an exemption.

More information

For more information on our School Street programme, please visit www.haringey.gov.uk/school-streets

Yours faithfully,

Haringey School Streets Team

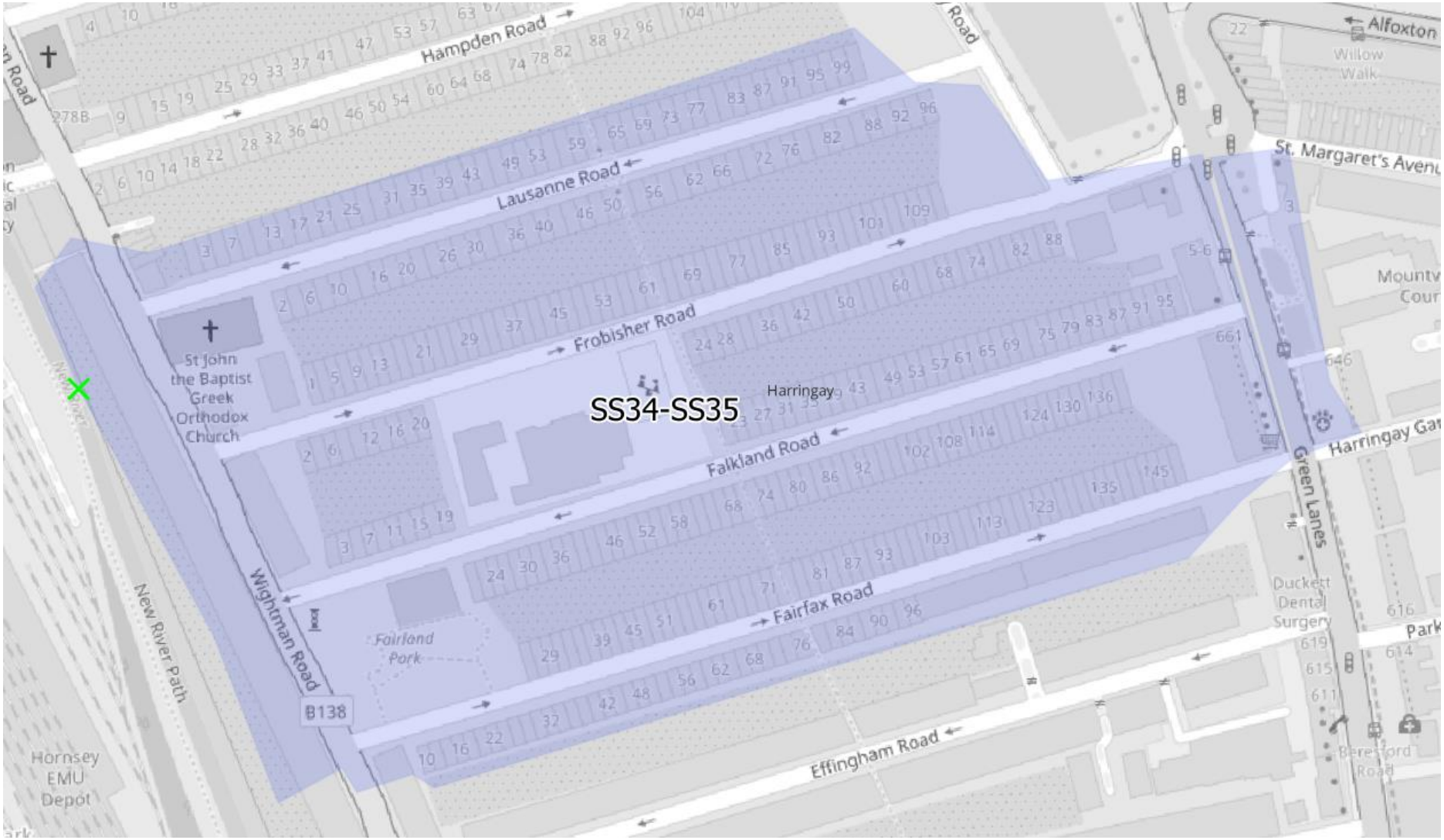
EXAMPLE LETTER

Alternative formats and translations

If you would like the document translated or in an alternative format (including audio) please contact us with your name, address and title of the document you need assistance with:
Email: consultationtranslation@haringey.gov.uk
Write to: Freepost Plus RTKX-AJJC-ULRY London Borough of Haringey N22 8HQ

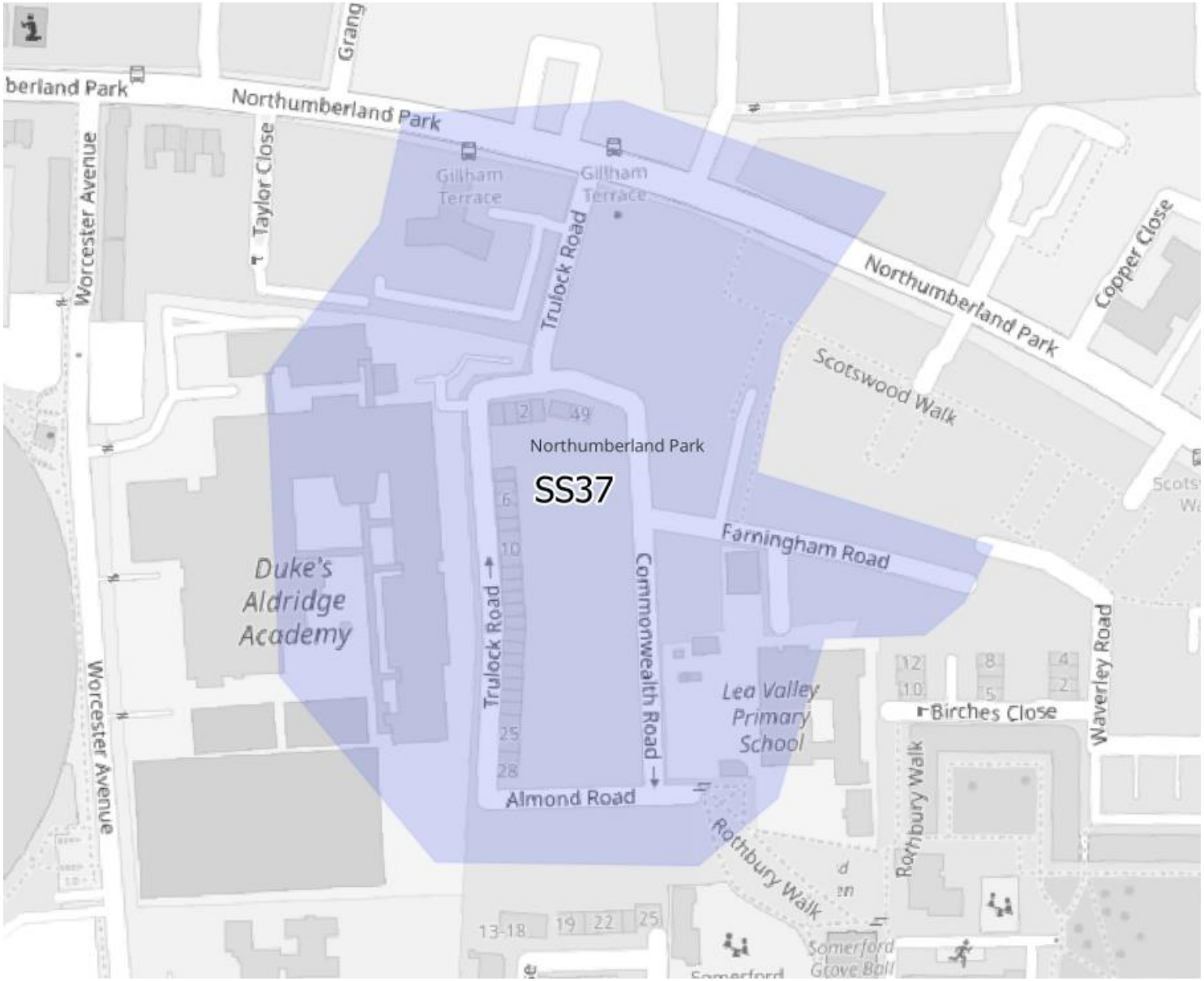
School Streets

Statutory consultation letter drop distribution areas, November 2023



School Streets

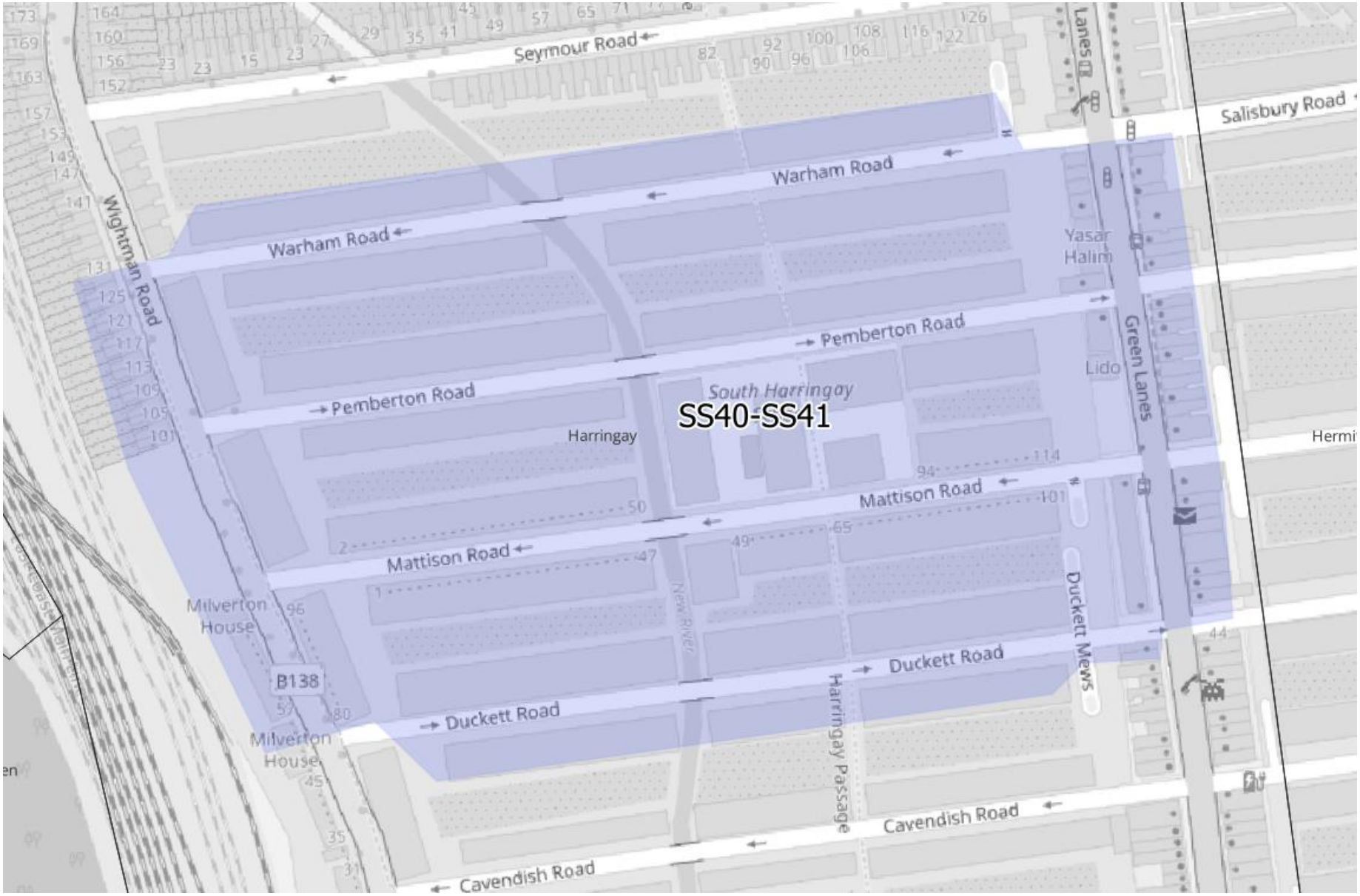
Statutory consultation letter drop distribution areas, November 2023



School Streets
Statutory consultation letter drop distribution areas, November 2023



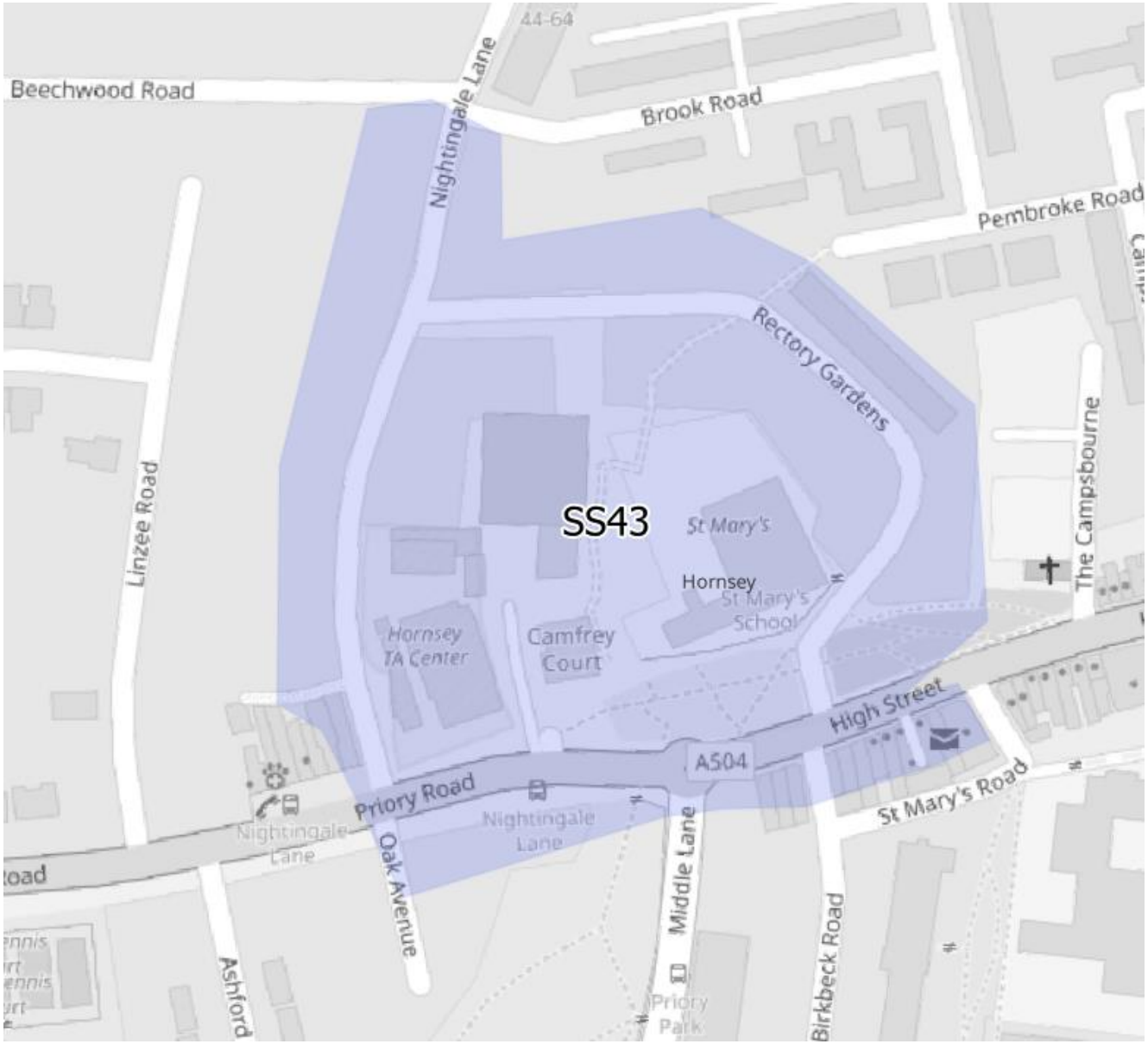
School Streets
Statutory consultation letter drop distribution areas, November 2023



School Streets
Statutory consultation letter drop distribution areas, November 2023

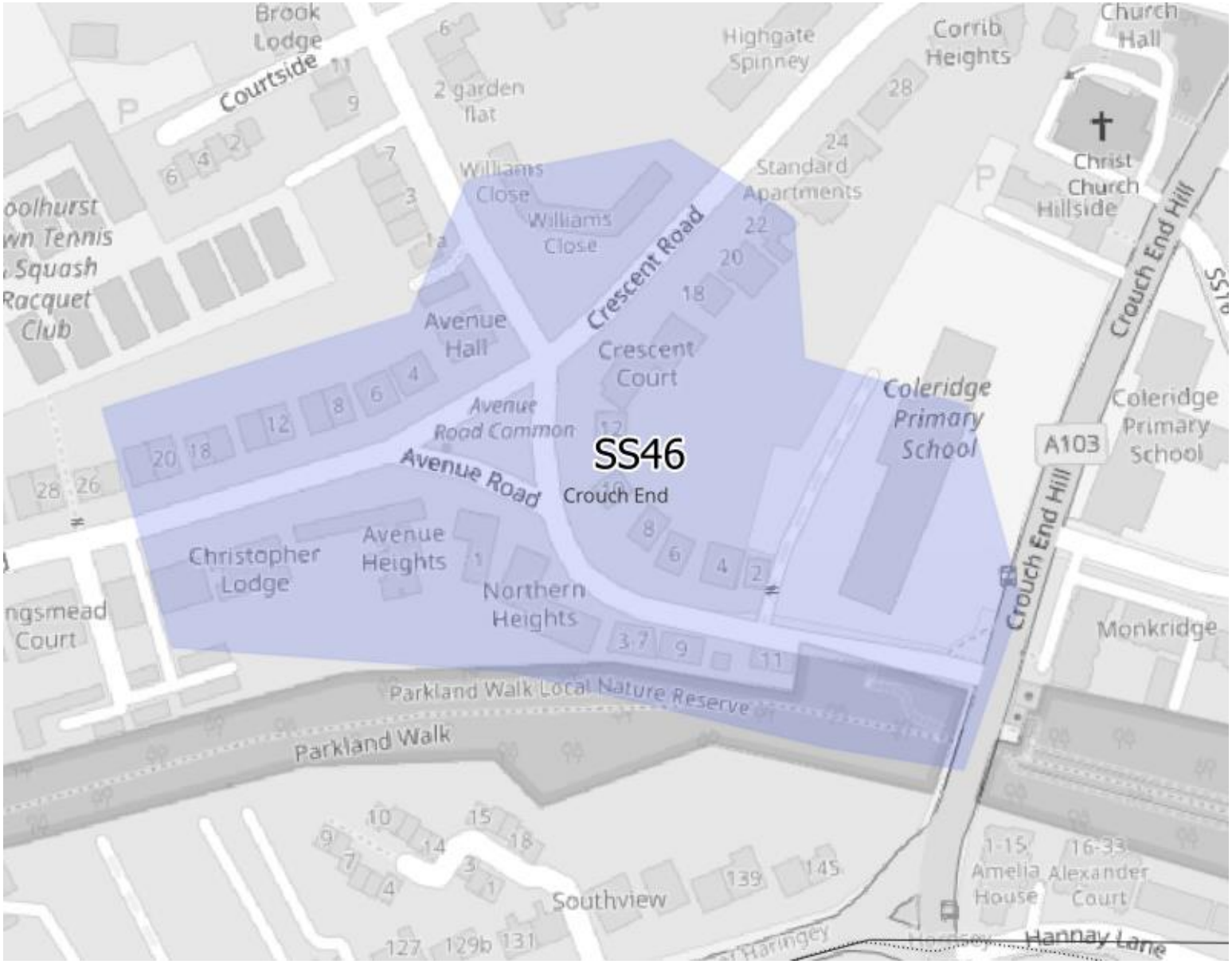


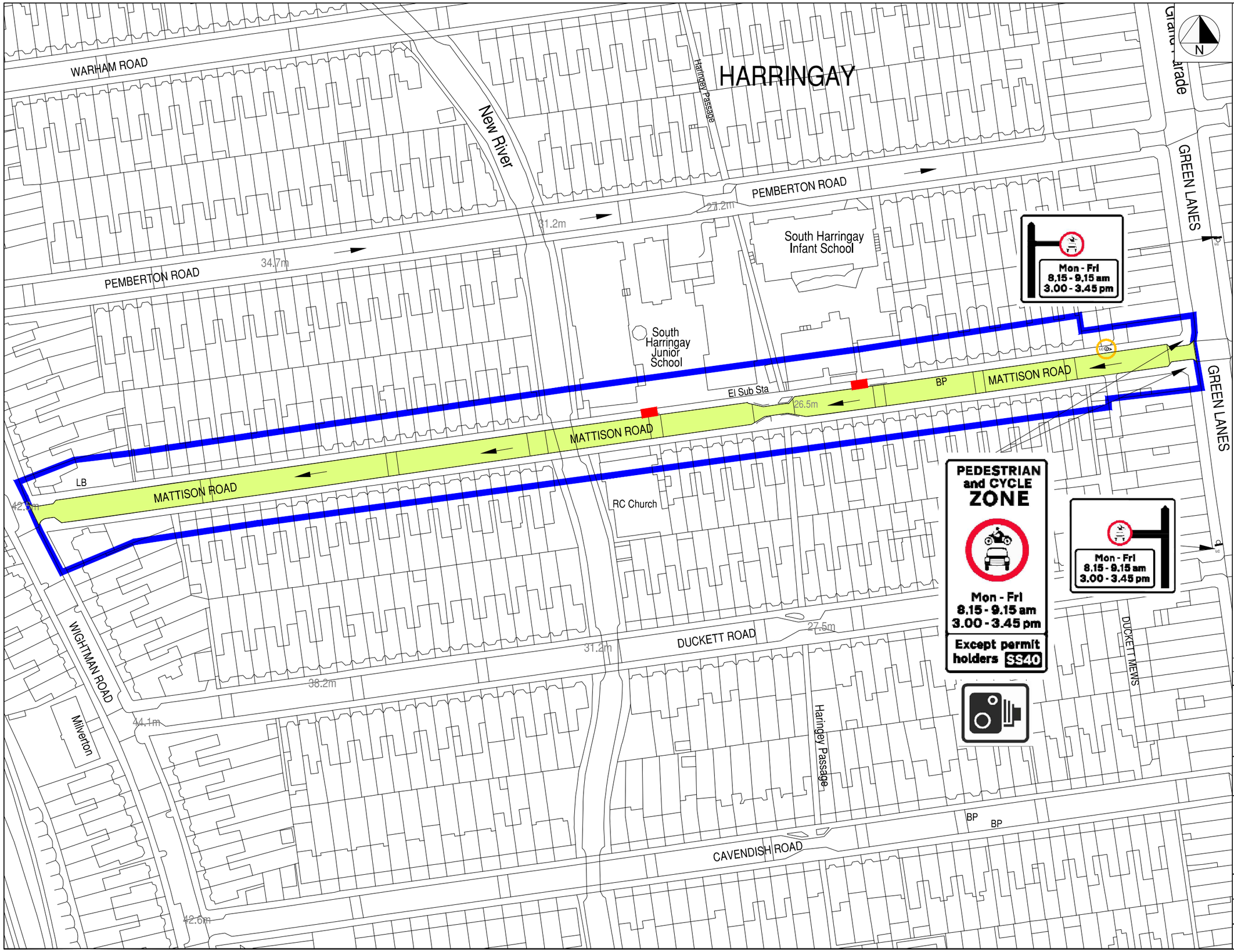
School Streets
Statutory consultation letter drop distribution areas, November 2023



School Streets

Statutory consultation letter drop distribution areas, November 2023





Key:

- Existing green space
- Existing kerb line (OS base)
- Existing gully/utility cover
- Existing lighting column/sign post/Belisha beacon
- Existing crossover
- Existing line marking
- Existing tactile paving
- Existing tree
- Existing sign post with proposed sign/ Proposed sign post and sign
- Existing bollard/Remove bollard/Proposed collapsible bollard with reflectors
- Proposed sign on existing lighting column
- Proposed rectangular bolt down kerbs - 0.914m L x 0.15m W x 0.1m H (Rediweld Harlow Kerbs)
- Proposed square wooden planter 1m L x 1m W x 0.9m H with reflectors

Approximate Quantities

Collapsible bollard with reflectors - 2x
Square planter with reflectors 1m x 1m x 0.9m - 4x
Bolt down Kerbs - 16x
Signposts - 5x
Signs to TSRGD 619, 750mm - 8x
Signs to TSRGD 816, - 1x
Except cycles plate - 1x
Except for access plate - 2x
Roundels (150mm) to TSRGD 955 - 2x
LB Haringey Sign - 2x

Notes:

1. Drawing is based on OS base, dimensions and street furniture positions to be checked on site and any discrepancies to be reported.
2. Not all road markings shown.
3. Proposed pre-formed thermoplastic cycle markings to TSRGD diagram 1057, 1215mm, installed in a central position.
4. All planters and bollards to be equipped with reflectors.
5. Allow small gap between kerb and planter for drainage
6. Use four bolt down kerb sections around perimeter of each planter to fix planters in place. Maintain gap between each planter and kerbside for drainage purposes. Bolt down kerb sections to be saw cut on site to required lengths.
7. Low plants to be used in planters to avoid obstructing visibility, except where trees are proposed.
8. Signs to be mounted with anti-rotational fixings at 2.3m minimum height.
9. No parking loss.
10. Cargobike 2.45m tracked at 8km/h through filter.
11. Small rigid vehicle (7m long) tracked at 3km/h. No dry steering used.

General Notes:

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6. Levels based on OS datum (Newlyn).
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11. These drawings have been produced under the CDM 2015 Regulations. The client is directed to their duties under Regulation 4 of CDM 2015.
12. The delivery of this drawing in electronic format shall not be construed to provide any authorisation or right of the recipient or any other person to rely upon, alter or otherwise use the information provided. Any use of this information is at the sole risk and liability of the user and Sustrans assumes no liability for unauthorised use or alteration of the information contained herein.
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B	LB Haringey design comments	LC	ZH	GF	21/04/2022
A	RSA + LB Haringey comments	LC	ZH	GF	04/02/2022

Haringey LONDON

5th Floor, Alexandra House, 10 Station Road, Wood Green, London N22 7TR
Tel: 020 8489 0000 **Fax:** 020 8489 1251
Director of Environment & Neighbourhoods: Barry Francis

Project: SCHOOL STREET

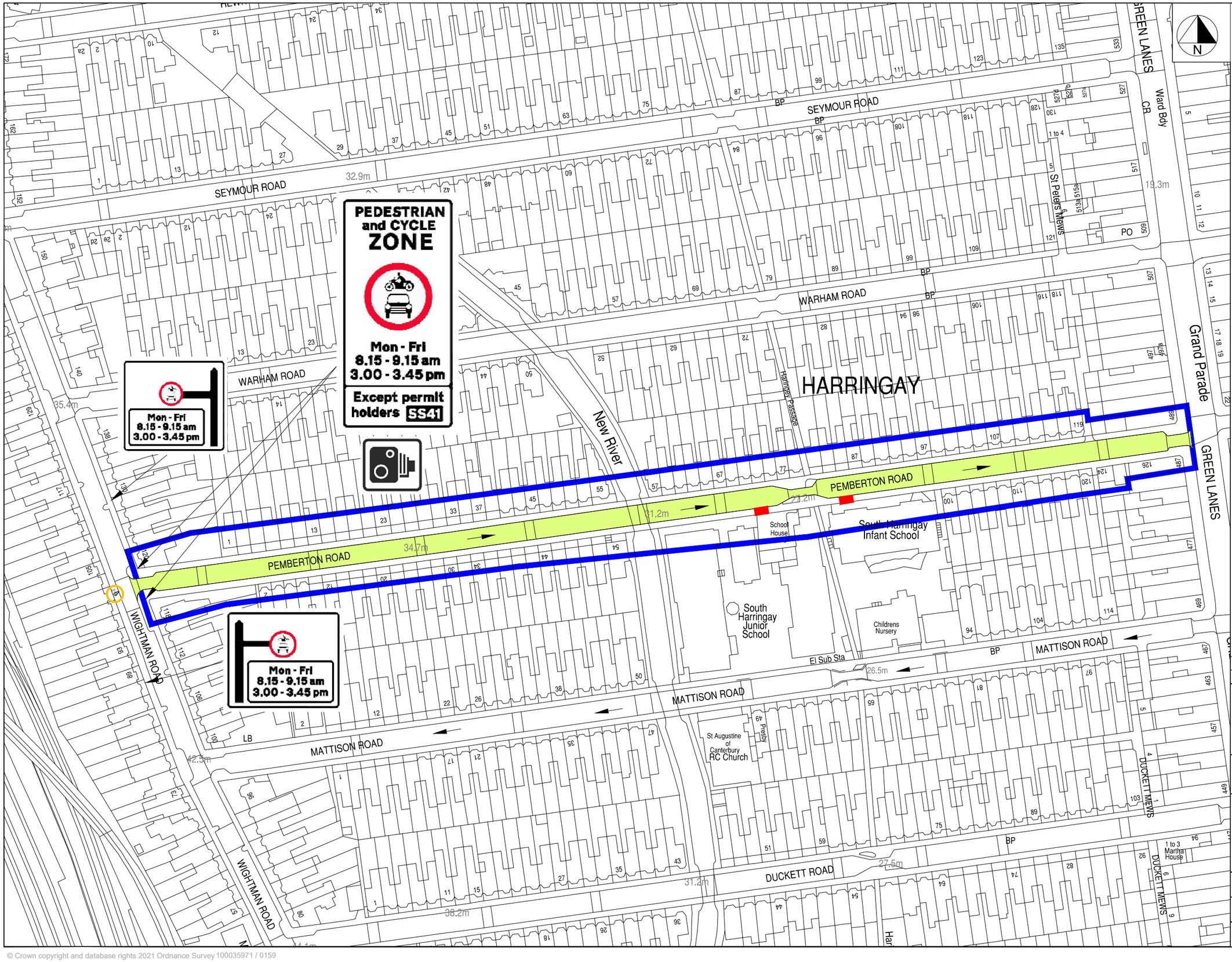
Title: SS40 SOUTH HARRINGAY MATTISON ROAD

Drawn:	Check:	Appr:	Date:	Scale at A3:
				NTS

Status: SCHOOL STREET

Drawing No:	Revision:
DWG NO 1	REV1

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Key:

- Existing green space
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- Proposed square wooden planter 1m L x 1m W x 0.9m H with reflectors

Approximate Quantities
Collapsible bollard with reflectors - 2x
Square planter with reflectors 1m x 1m x 0.9m - 4x
Bolt down Kerbs - 16x
Signposts - 5x
Signs to TSRGD 619, 750mm - 8x
Signs to TSRGD 816, - 1x
Except cycles plate - 1x
Except for access plate - 2x
Roundels (150mm) to TSRGD 955 - 2x
LB Haringey Sign - 2x

Notes:
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5. Allow small gap between kerb and planter for drainage
6. Use four bolt down kerb sections around perimeter of each planter to fix planters in place. Maintain gap between each planter and kerbside for drainage purposes. Bolt down kerb sections to be saw cut on site to required lengths.
7. Low plants to be used in planters to avoid obstructing visibility, except where trees are proposed.
8. Signs to be mounted with anti-rotational fixings at 2.3m minimum height.
9. No parking loss.
10. Cargobike 2.45m tracked at 8km/h through filter.
11. Small rigid vehicle (7m long) tracked at 3km/h. No dry steering used.

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Haringey LONDON
5th Floor, Alexandra House, 10 Station Road, Wood Green, London N22 7TR
Tel: 020 8489 0000 Fax: 020 8489 1251
Director of Environment & Neighbourhoods: Barry Francis

Project:
SCHOOL STREET

Title:
SS41 SOUTH HARRINGAY
PEMBERTON ROAD

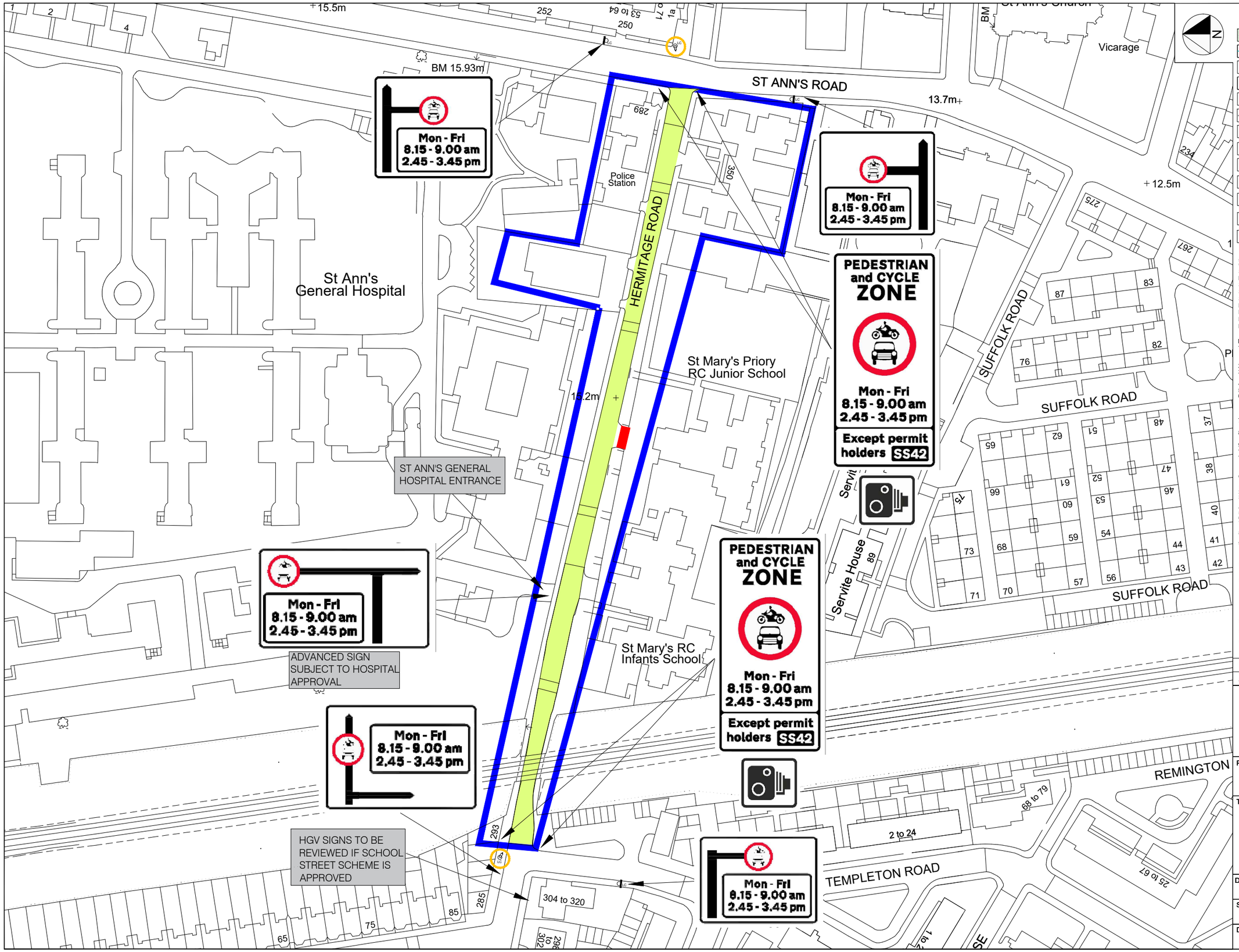
Drawn: Check: Appr: Date: Scale at A3:
NTS

Status:
SCHOOL STREET

Drawing No:
DWG NO 1

Revision:
REV1

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Key:

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- Proposed rectangular bolt down kerbs - 0.914m L x 0.15m W x 0.1m H (Rediweld Harlow Kerbs)
- Proposed square wooden planter 1m L x 1m W x 0.9m H with reflectors

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Haringey LONDON
5th Floor, Alexandra House, 10 Station Road, Wood Green, London N22 7TR
Tel: 020 8489 0000 **Fax:** 020 8489 1251
Director of Environment & Neighbourhoods: Barry Francis

Project: SCHOOL STREET

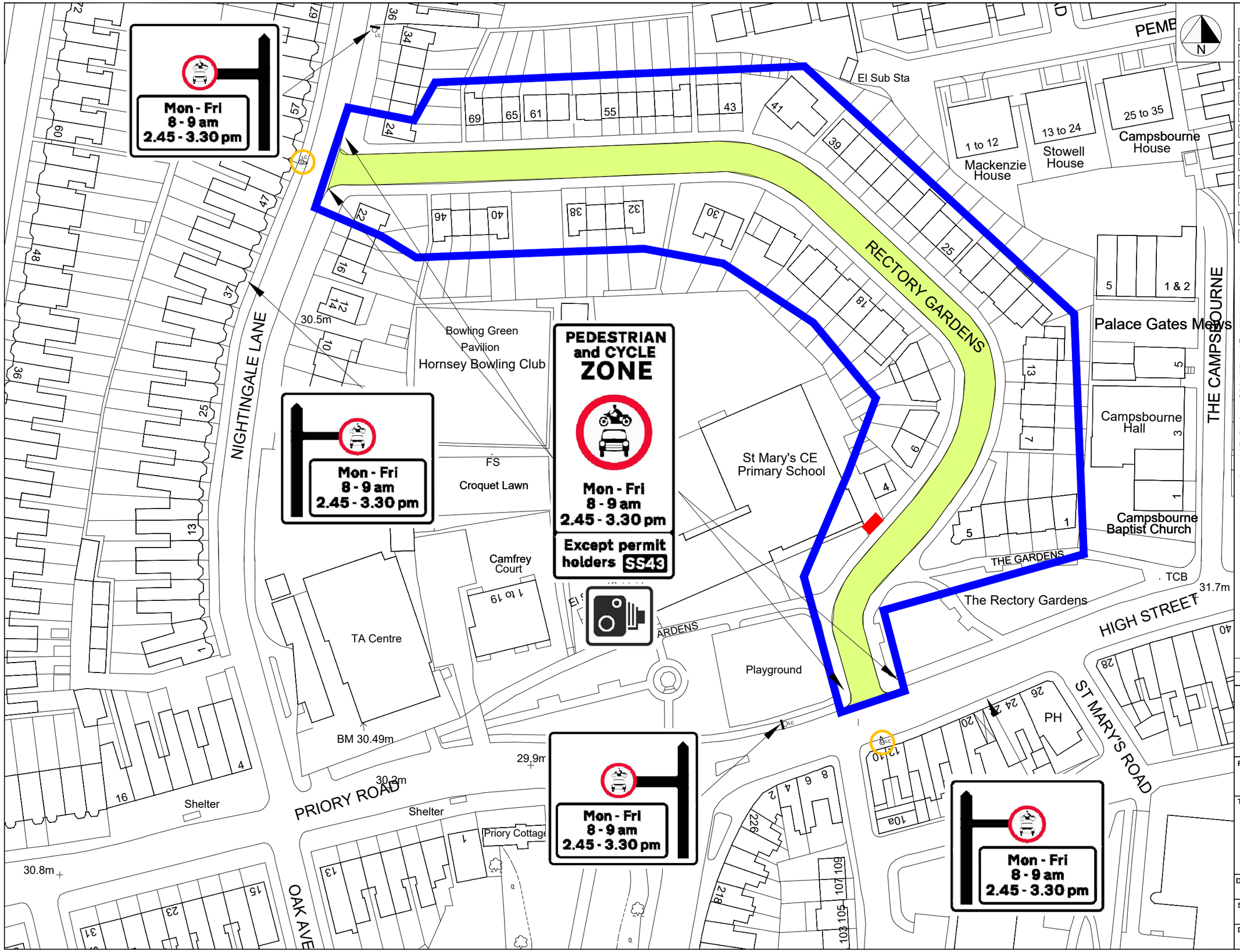
Title: SS42 ST MARYS PRIORY JUNIOR SCHOOL

Drawn: **Check:** **Appr:** **Date:** **Scale at A3:**

Status: SCHOOL STREET

Drawing No: **Revision:**

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- Proposed square wooden planter 1m L x 1m W x 0.9m H with reflectors

Approximate Quantities
Collapsible bollard with reflectors - 2x
Square planter with reflectors 1m x 1m x 0.9m - 4x
Bolt down Kerbs - 16x
Signposts - 5x
Signs to TSRGD 619, 750mm - 8x
Signs to TSRGD 816, - 1x
Except cycles plate - 1x
Except for access plate - 2x
Roundels (150mm) to TSRGD 955 - 2x
LB Haringey Sign - 2x

Notes:
1. Drawing is based on OS base, dimensions and street furniture positions to be checked on site and any discrepancies to be reported.
2. Not all road markings shown.
3. Proposed pre-formed thermoplastic cycle markings to TSRGD diagram 1057, 1215mm, installed in a central position.
4. All planters and bollards to be equipped with reflectors.
5. Allow small gap between kerb and planter for drainage
6. Use four bolt down kerb sections around perimeter of each planter to fix planters in place. Maintain gap between each planter and kerbside for drainage purposes. Bolt down kerb sections to be saw cut on site to required lengths.
7. Low plants to be used in planters to avoid obstructing visibility, except where trees are proposed.
8. Signs to be mounted with anti-rotational fixings at 2.3m minimum height.
9. No parking loss.
10. Cargobike 2.45m tracked at 8km/h through filter.
11. Small rigid vehicle (7m long) tracked at 3km/h. No dry steering used.

General Notes:

1. All dimensions in metres, unless otherwise noted.
2. Do not scale off plan.
3. Dimensions are to be checked by the contractor prior to commencement of work. Any discrepancy shall be reported immediately to Sustrans.
4. Drawing based on OS base plan.
5. Co-ordinates based on OS grid.
6. Levels based on OS datum (Newlyn).
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A	RSA + LB Haringey comments	LC	ZH	GF	04/02/2022

Haringey LONDON
5th Floor, Alexandra House, 10 Station Road, Wood Green, London N22 7TR
Tel: 020 8489 0000 Fax: 020 8489 1251
Director of Environment & Neighbourhoods: Barry Francis

Project:
SCHOOL STREET

Title:
SS43 ST MARY'S CE PRIMARY SCHOOL

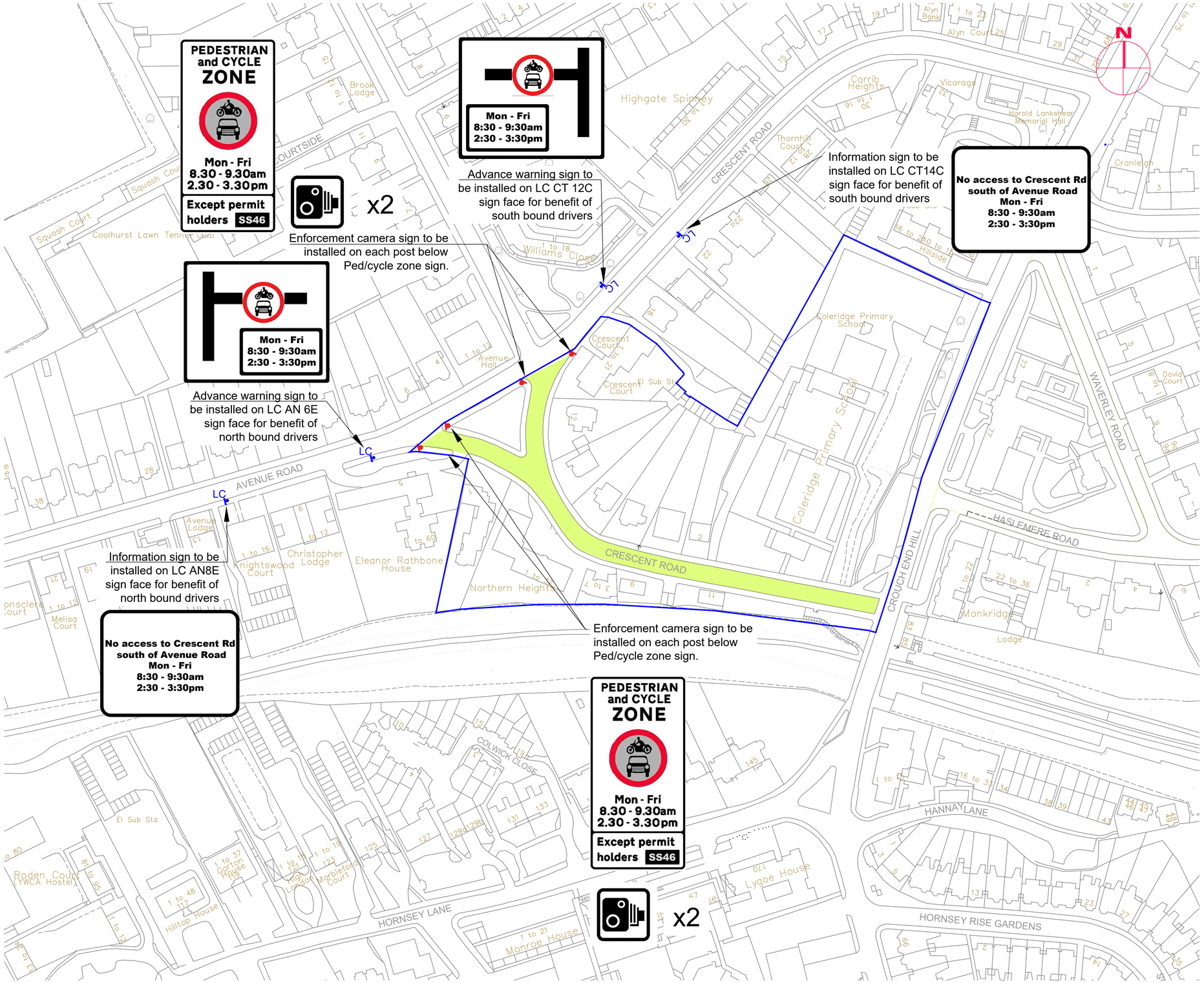
Drawn: Check: Appr: Date: Scale at A3:
NTS

Status:
SCHOOL STREET

Drawing No:
DWG NO 1

Revision:
REV1

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NOTES:

- Proposed School Street
- Proposed cycle/ped zone sign & post
- Properties eligible for a school street exemption permit
- LC Existing lamp column

SS46

N

Rev	Description	Checked	Date
*			

Project: School Street Batch 1c

Title: Coleridge Primary School Crescent Road extension

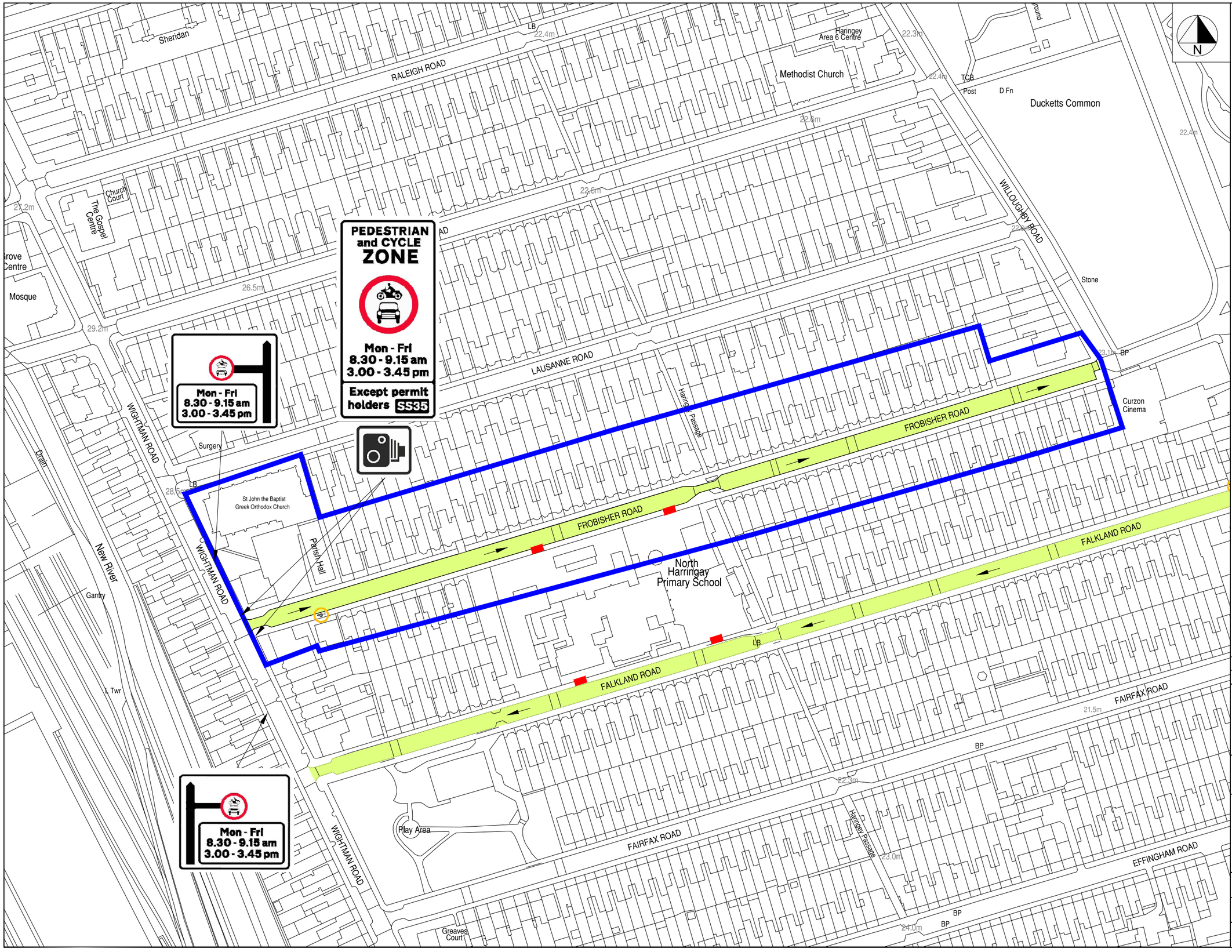
Path: S:\ENv\Strt\Scrn\High\Srv\FA\IF\Sustainable Transport\TPP Group\.....

Designed: | Drawn: | Checked:

Scale: 1:500 @A3 | Date Drawing Created:

Drg. No: RJHWP | Rev: -

ENVIRONMENT & NEIGHBOURHOODS
5th Floor, Alexandra House, 10 Station Road, Wood Green, London N22 7TR
Tel: 020 8489 0000 Fax: 020 8489 1251
Director Place and Sustainability: Lyn Garner
Haringey LONDON
www.haringey.gov.uk



Key:

- Existing green space
- Existing kerb line (OS base)
- Existing gully/utility cover
- Existing lighting column/sign post/Belisha beacon
- Existing crossover
- Existing line marking
- Existing tactile paving
- Existing tree
- Existing sign post with proposed sign/ Proposed sign post and sign
- Existing bollard/Remove bollard/Proposed collapsible bollard with reflectors
- Proposed sign on existing lighting column
- Proposed rectangular bolt down kerbs - 0.914m L x 0.15m W x 0.1m H (Rediweld Harlow Kerbs)
- Proposed square wooden planter 1m L x 1m W x 0.9m H with reflectors

Approximate Quantities
Collapsible bollard with reflectors - 2x
Square planter with reflectors 1m x 1m x 0.9m - 4x
Bolt down Kerbs - 16x
Signposts - 5x
Signs to TSRGD 619, 750mm - 8x
Signs to TSRGD 816, - 1x
Except cycles plate - 1x
Except for access plate - 2x
Roundels (150mm) to TSRGD 955 - 2x
LB Haringey Sign - 2x

Notes:
1. Drawing is based on OS base, dimensions and street furniture positions to be checked on site and any discrepancies to be reported.
2. Not all road markings shown.
3. Proposed pre-formed thermoplastic cycle markings to TSRGD diagram 1057, 1215mm, installed in a central position.
4. All planters and bollards to be equipped with reflectors.
5. Allow small gap between kerb and planter for drainage
6. Use four bolt down kerb sections around perimeter of each planter to fix planters in place. Maintain gap between each planter and kerbside for drainage purposes. Bolt down kerb sections to be saw cut on site to required lengths.
7. Low plants to be used in planters to avoid obstructing visibility, except where trees are proposed.
8. Signs to be mounted with anti-rotational fixings at 2.3m minimum height.
9. No parking loss.
10. Cargobike 2.45m tracked at 8km/h through filter.
11. Small rigid vehicle (7m long) tracked at 3km/h. No dry steering used.

General Notes:
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A	RSA + LB Haringey comments	LC	ZH	GF	04/02/2022

Haringey LONDON
5th Floor, Alexandra House, 10 Station Road, Wood Green, London N22 7TR
Tel: 020 8489 0000 **Fax:** 020 8489 1251
Director of Environment & Neighbourhoods: Barry Francis

Project: SCHOOL STREET

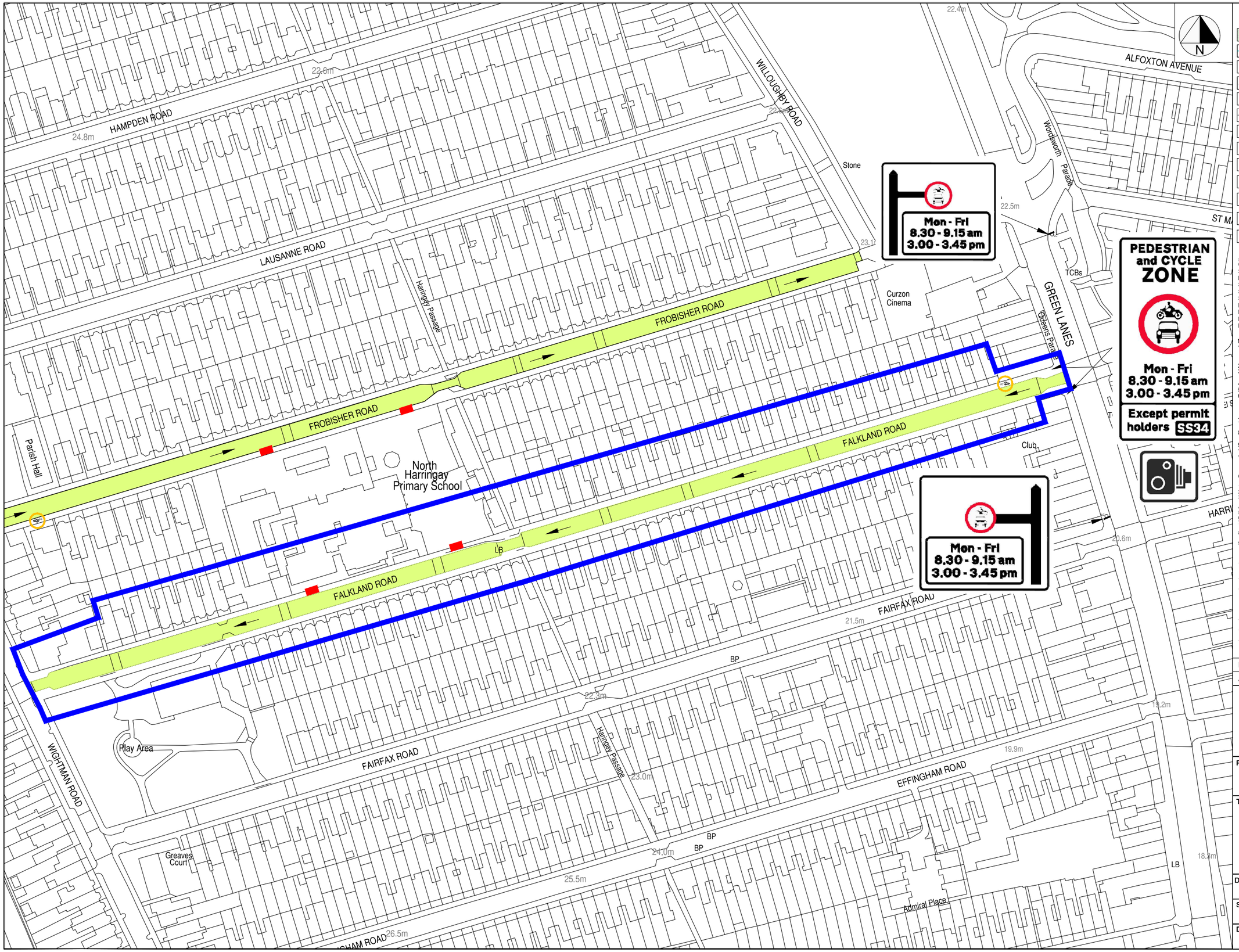
Title: SS35 NORTH HARRINGAY FALKLAND ROAD

Drawn: **Check:** **Appr:** **Date:** **Scale at A3:** NTS

Status: SCHOOL STREET

Drawing No: DWG NO 1 **Revision:** REV1

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Key:

- Existing green space
- Existing kerb line (OS base)
- Existing gully/utility cover
- Existing lighting column/sign post/Belisha beacon
- Existing crossover
- Existing line marking
- Existing tactile paving
- Existing tree
- Existing sign post with proposed sign/ Proposed sign post and sign
- Existing bollard/Remove bollard/Proposed collapsible bollard with reflectors
- Proposed sign on existing lighting column
- Proposed rectangular bolt down kerbs - 0.914m L x 0.15m W x 0.1m H (Rediweld Harlow Kerbs)
- Proposed square wooden planter 1m L x 1m W x 0.9m H with reflectors

Approximate Quantities
Collapsible bollard with reflectors - 2x
Square planter with reflectors 1m x 1m x 0.9m - 4x
Bolt down Kerbs - 16x
Signposts - 5x
Signs to TSRGD 619, 750mm - 8x
Signs to TSRGD 816, - 1x
Except cycles plate - 1x
Except for access plate - 2x
Roundels (150mm) to TSRGD 955 - 2x
LB Haringey Sign - 2x

Notes:
1. Drawing is based on OS base, dimensions and street furniture positions to be checked on site and any discrepancies to be reported.
2. Not all road markings shown.
3. Proposed pre-formed thermoplastic cycle markings to TSRGD diagram 1057, 1215mm, installed in a central position.
4. All planters and bollards to be equipped with reflectors.
5. Allow small gap between kerb and planter for drainage
6. Use four bolt down kerb sections around perimeter of each planter to fix planters in place. Maintain gap between each planter and kerbside for drainage purposes. Bolt down kerb sections to be saw cut on site to required lengths.
7. Low plants to be used in planters to avoid obstructing visibility, except where trees are proposed.
8. Signs to be mounted with anti-rotational fixings at 2.3m minimum height.
9. No parking loss.
10. Cargobike 2.45m tracked at 8km/h through filter.
11. Small rigid vehicle (7m long) tracked at 3km/h. No dry steering used.

General Notes:
1. All dimensions in metres, unless otherwise noted.
2. Do not scale off plan.
3. Dimensions are to be checked by the contractor prior to commencement of work. Any discrepancy shall be reported immediately to Sustrans.
4. Drawing based on OS base plan.
5. Co-ordinates based on OS grid.
6. Levels based on OS datum (Newlyn).
7. This drawing is to be read in conjunction with all other relevant drawings and specifications.
8. All work shall be carried out in accordance with LB Enfield statutory authority and health & safety requirements and regulations.
9. The position of services is based on information provided by other parties at the time of design and is for guidance only. It is the responsibility of the Client and Contractor to verify the exact position of any services before commencing works on site.
10. Temporary traffic works must be undertaken in accordance with Chapter 8 parts 1 & 2 of the Traffic Signs Manual, Safety at Street Works and Road Works Code of Practice 2013 and any other relevant H&S legislation.
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B	LB Haringey design comments	LC	ZH	GF	21/04/2022
A	RSA + LB Haringey comments	LC	ZH	GF	04/02/2022

Haringey LONDON
5th Floor, Alexandra House, 10 Station Road, Wood Green, London N22 7TR
Tel: 020 8489 0000 **Fax:** 020 8489 1251
Director of Environment & Neighbourhoods: Barry Francis

Project: SCHOOL STREET

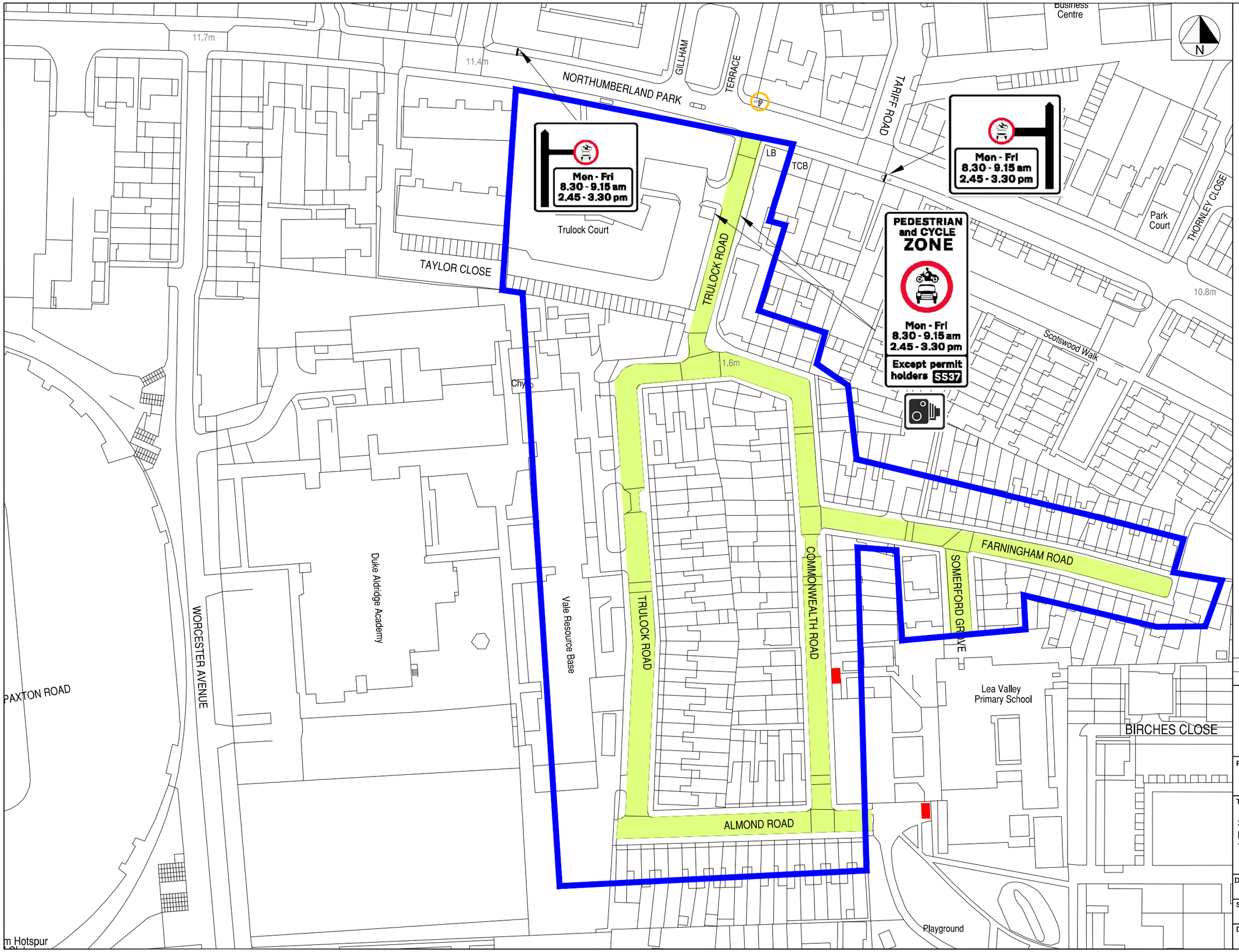
Title: SS34 NORTH HARRINGAY FALKLAND ROAD

Drawn: **Check:** **Appr:** **Date:** **Scale at A3:** NTS

Status: SCHOOL STREET

Drawing No: DWG NO 1 **Revision:** REV1

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Key:

- Existing one-way direction
- Existing school gate entrance
- Proposed sign on existing lighting column
- Proposed ANPR camera on existing lighting column
- Proposed School Street
- Proposed sign on proposed post
- Properties eligible for a School Street exemption permit

Notes:

1. Drawing is based on OS base, dimensions and street furniture positions to be checked on site by the Contractor.
2. Not all road markings are shown.
3. Signs to be mounted with anti-rotational fixings at 2.3m minimum height.
4. Posts to be 76mm or 89mm as specified on drawing.

General Notes:

1. All dimension are in metres, unless otherwise noted.
2. Do not scale off plan.
3. This drawing is to be read in conjunction with all other relevant drawings and specifications.
4. Temporary traffic works must be undertaken in accordance with Chapter 8 parts 1 & 2 of the Traffic Signs Manual, Safety at Street Works and Road Works Code of Practice 2013 and any other relevant H&S legislation.
5. All works shall be carried out in accordance with LB Haringey statutory authority and health & safety requirements and regulations.

Haringey LONDON
5th Floor, Alexandra House, 10 Station Road, Wood Green, London N22 7TR
Tel: 020 8489 0000 Fax: 020 8489 1251
Director of Environment & Neighbourhoods: Barry Francis

Project: SCHOOL STREET

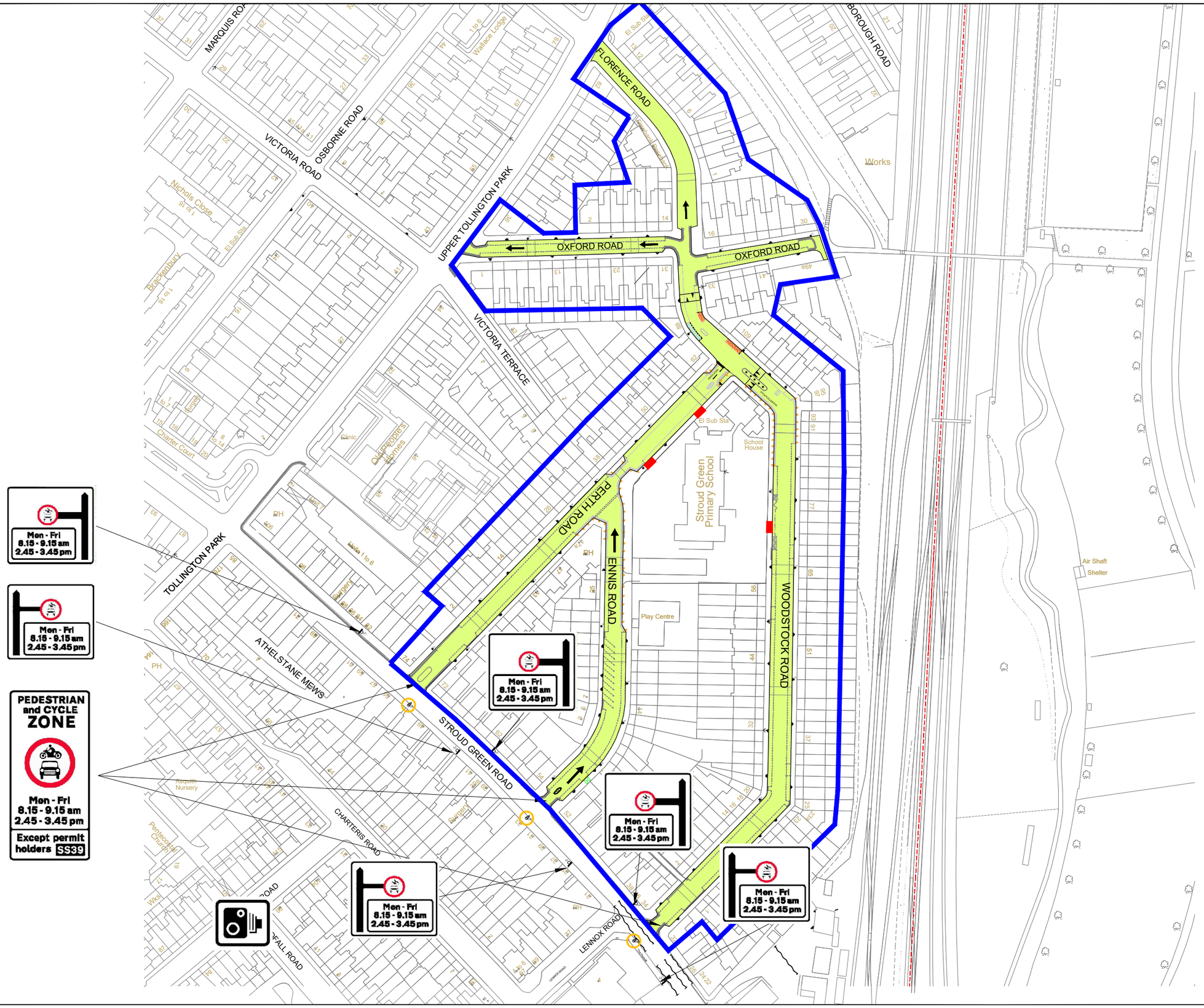
Title: SS37 LEA VALLEY PRIMARY SCHOOL, DUKES ALDRIDGE ACADEMY AND THE VALE SECONDARY RESOURCE

Drawn:	Check:	Appr:	Date:	Scale at A3:
			Aug 2023	NTS

Status: SCHOOL STREET

Drawing No: | Revision:

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Key:

- Existing green space
- Existing kerb line (OS base)
- Existing gully/utility cover
- Existing lighting column/sign post/Belisha beacon
- Existing crossover
- Existing line marking
- Existing tactile paving
- Existing tree
- Existing sign post with proposed sign/ Proposed sign post and sign
- Existing bollard/Remove bollard/Proposed collapsible bollard with reflectors
- Proposed sign on existing lighting column
- Proposed rectangular bolt down kerbs - 0.914m L x 0.15m W x 0.1m H (Rediweld Harlow Kerbs)
- Proposed square wooden planter 1m L x 1m W x 0.9m H with reflectors

Approximate Quantities
Collapsible bollard with reflectors - 2x
Square planter with reflectors 1m x 1m x 0.9m - 4x
Bolt down Kerbs - 16x
Signposts - 5x
Signs to TSRGD 619, 750mm - 8x
Signs to TSRGD 816, - 1x
Except cycles plate - 1x
Except for access plate - 2x
Roundels (150mm) to TSRGD 955 - 2x
LB Haringey Sign - 2x

Notes:
1. Drawing is based on OS base, dimensions and street furniture positions to be checked on site and any discrepancies to be reported.
2. Not all road markings shown.
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4. All planters and bollards to be equipped with reflectors.
5. Allow small gap between kerb and planter for drainage
6. Use four bolt down kerb sections around perimeter of each planter to fix planters in place. Maintain gap between each planter and kerbside for drainage purposes. Bolt down kerb sections to be saw cut on site to required lengths.
7. Low plants to be used in planters to avoid obstructing visibility, except where trees are proposed.
8. Signs to be mounted with anti-rotational fixings at 2.3m minimum height.
9. No parking loss.
10. Cargobike 2.45m tracked at 8km/h through filter.
11. Small rigid vehicle (7m long) tracked at 3km/h. No dry steering used.

General Notes:

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A	RSA + LB Haringey comments	LC	ZH	GF	04/02/2022

Haringey LONDON
5th Floor, Alexandra House, 10 Station Road, Wood Green, London N22 7TR
Tel: 020 8489 0000 Fax: 020 8489 1251
Director of Environment & Neighbourhoods: Barry Francis

Project:
SCHOOL STREET

Title:
SS39 STROUD GREEN PRIMARY SCHOOL

Drawn: Check: Appr: Date: Scale at A3:

Status:
SCHOOL STREET

Drawing No: Revision:

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19 October 2023

School Street statutory consultation
Lancastrian Primary and The Vale School Street (SS12)

Dear Resident or business,

I am writing to you to provide information about a School Street that is proposed in this area and to invite you to share your views as part of this consultation.

Background

During December 2023 and January 2024, the Council consulted on a possible School Street in proximity to Lancastrian Primary and The Vale schools.

Having considered all the feedback received it was agreed that changes should be made to the scheme design and the public should be given opportunity to comment on the amended design.

What is a School Street?

School Streets transform roads outside schools, so that pedestrians and cyclists are prioritised at school start and finish times.

They reduce road danger, improve air quality and tackle congestion near the school gates, making it easier and safer to walk and cycle to school.

They create a more pleasant environment for everyone, while making sure residents, businesses, pedestrians and cyclists can use the road.

Why School Streets?

The Council is committed to tackling our climate emergency and the escalating levels of pollution at peak times on our road network. Childhood obesity in the borough is also one of the highest in London. We currently have 24 School Streets operating in Haringey and there are over 500 across London.

How do they work?

The streets around a school temporarily become a Pedestrian and Cycle Zone in the morning and afternoon, to coincide with the start and end of the school day, Monday to Friday, during term time.

Motor vehicles are not permitted to enter the zone during these times unless they have been granted an exemption. Exemptions are available in some instances and are applied ‘virtually’ and enforced by camera. This means those motorists with an exemption, including emergency services, have unhindered access to the road network.

What is being proposed?

The amended proposal is shown on the enclosed plan and is summarised as follows:

- The following streets to become a School Street:
  - Church Road (between Beaufoy Road and the existing no motor vehicles traffic filter, under the rail bridge)
  - Tebworth Road
  - Nursery Street

    - New Road
    - King Street
    - Kings Road
    - Bruce Castle Road
    - Birkbeck Road (between Ruskin Road and Kings Road)
- The School Street would operate:
    - Term time only
    - Monday to Friday
    - 8:15am – 9:15am and 2:45pm – 3:45pm
- Motor vehicles (cars, vans, motorcycles etc.) will not be allowed to enter the School Street during the above times except if they have been issued an exemption (see details below)
- To inform drivers, we will install traffic signs and send updates to sat-nav companies
- Motor vehicles that enter the School Street without an exemption, during operational hours, will be identified by camera and may be issued a Penalty Charge Notice (PCN)
- No one needs an exemption to drive out of a School Street. You only need an exemption to drive into the School Street during operational hours
- School Streets remain open to people walking, cycling and wheeling
- Emergency services will always have unhindered access
- Minor changes to parking restrictions in Church Road

Who is eligible for a School Street exemption?

If the scheme goes ahead, the following groups would be eligible to apply for an exemption:

- Residents or businesses who have an address within the School Street (see note below) to a maximum of two per property
- Blue Badge holders who require access to the School Street
- Pupils with a disability that prevents them walking or cycling to school
- Medical practitioners visiting someone with an address in the School Street
- School vehicles transporting disabled children

Note: properties within the boundary of the School Street would be eligible for a resident or business School Street exemption. Those properties are outlined in blue on the enclosed plan.

Motor vehicles without an exemption (including visitors, tradespeople or delivery drivers) are not permitted to drive into the School Street during operational times. However, no exemption is required to drive out of a School Street, eg. vehicles that were already parked when it came into operation.

How can I have my say?

We welcome your views on the enclosed plan. Please respond by Wednesday 15 November 2023.

Send general feedback:

The easiest way to give feedback is to complete a short questionnaire by:

- scanning this QR code *or*
- visiting haringey.gov.uk/school-street-have-your-say *or*
- filling in the enclosed paper questionnaire and posting it back to us, using the envelope provided (no stamp required)

Alternatively, should you wish to make a formal objection or other representations to the proposed traffic management orders you should send the grounds for your objection by 15 November 2023, quoting reference 2023-T52, via:

- Online: https://consultation.appyway.com/haringey *or*
- Email: traffic.orders@haringey.gov.uk *or*
- Post: Traffic Management Group, Alexandra House, 4th floor, 10 Station Road, Wood Green, N22 7TR

If you need assistance responding, you can email schoolstreets@haringey.gov.uk.

What happens next?

Once the consultation has closed, we will review all feedback received and consider any objections received before taking a decision on how to proceed. This decision is expected to be taken by Cabinet during winter 2023. If the School Street is approved, we expect to implement the School Street in spring 2024.

Before any School Street launches, we will write to all eligible properties explaining how to apply for an exemption.

More information

For more information on our School Street programme, please visit www.haringey.gov.uk/school-streets

Yours faithfully,

Haringey School Streets Team

Yours faithfully,

Haringey School Streets Team

Alternative formats and translations

If you would like the document translated or in an alternative format (including audio) please contact us with your name, address and title of the document you need assistance with:
Email: consultationtranslation@haringey.gov.uk
Write to: Freepost Plus RTKX-AJJC-ULRY London Borough of Haringey N22 8HQ

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KEY:

- School Street
- Existing properties eligible for a School Street exemption permit
- School Gate Entrance
- Proposed ANPR camera on existing lamp column

Remove 4 x Event Day parking bays and replace with Double Yellow Lines

Existing motor vehicles prohibited filter

NURSERY STREET
TEBWORTH ROAD
CEMETERY ROAD
BEAUFOY ROAD
CHURCH ROAD
NEW ROAD
KING STREET
KINGS ROAD
RUSKIN ROAD
BIRKBECK ROAD
BRUCE CASTLE ROAD
LORDSHIP LANE

Lancasterian Primary School and The Vale School

PEDESTRIAN and CYCLE ZONE
Mon - Fri
8.15 - 9.15 am
2.45 - 3.45 pm
Except permit holders SS12

Mon - Fri
8.15 - 9.15 am
2.45 - 3.45 pm

Detail 1: Extents of School Street

Rev	Description	Checked	Date

Project: SCHOOL STREET

Title: SS12 LANCASTERIAN PRIMARY AND THE VALE SCHOOL

Path:

Designed:	Drawn:	Checked:
FC	FC	YK

Scale:	Date Drawing Created:
N.T.S.	08/23

Drg. No: Rev: –

ENVIRONMENT & NEIGHBOURHOODS
Direct services
Highways & Parking
5th Floor, Alexandra House, 10 Station Road, Wood Green, London N22 7TR
Tel: 020 8489 0000 Fax: 020 8489 1251
Director of Environment & Neighbourhoods: Barry Francis
www.haringey.gov.uk

SS12 Lancasterian Primary and The Vale School Street - Public survey - October 2023

Following earlier engagement, the council is consulting on a revised School Street near Lancasterian Primary and The Vale schools.

Please make yourself familiar with the relevant consultation document available at www.haringey.gov.uk/school-street-have-your-say before answering the questions.

It will take approximately 4 minutes to complete the survey.

Consultation closes Wednesday 15 November 2023.

For more details on our overall programme of School Streets: www.haringey.gov.uk/school-streets

Data Protection and Privacy Statement: www.haringey.gov.uk/privacy

* Required

1. Your name (optional)

2. Your house/property number (optional)

3. Your street name (optional)

4. Your postcode *

5. Your email address (optional)

If you provide this information, we will be able to update you on the decision following consultation

6. Are you a.... *

- ◯ Resident living within the proposed School Street
- ◯ Resident living outside the proposed School Street
- ◯ Parent / carer of a child that attends this school
- ◯ Parent / carer of a child that sometimes visits this school for lessons or clubs
- ◯ Business operating within the proposed School Street
- ◯ Business operating outside the proposed School Street
- ◯ Teacher / school staff
- ◯ Person who visits the area
- ◯ Person who works in the area
- ◯ Other

7. Overall, how do you feel about the proposed School Street? *

- ◯ Very positive
- ◯ Positive
- ◯ Neutral
- ◯ Negative
- ◯ Very negative

8. Thinking about the streets near the school, please tell us to what extent you think the following are a problem:

Optional

	Not at all	Somewhat	A lot
Traffic congestion	◯	◯	◯
Obstructive or dangerous parking	◯	◯	◯
Lack of visibility crossing the road	◯	◯	◯
Air pollution	◯	◯	◯

9. How do you feel about the following:

Optional

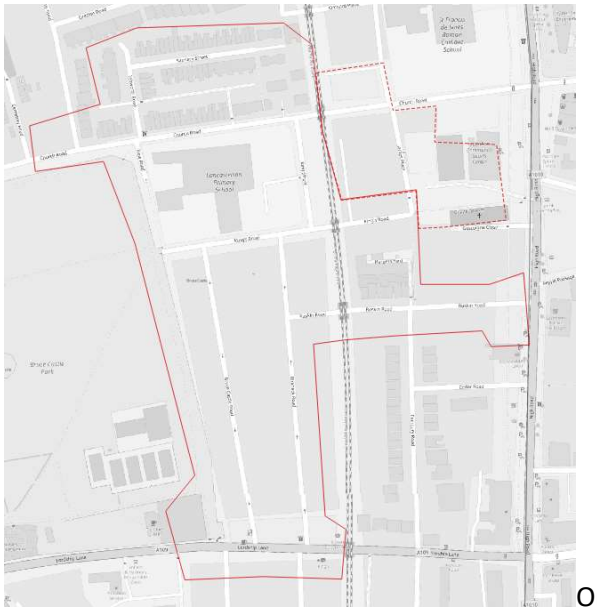
	Very positive	Positive	Neutral	Negative	Very negative
Walking environment near the school	◯	◯	◯	◯	◯
Cycling environment near the school	◯	◯	◯	◯	◯

10. Please use this space for any comments you may have on the proposed School Street

Optional

SS12 Lancastrian and The Vale School Street – reconsultation distribution area October 2023
Dotted line indicates extended consultation area (31/10/23)





Original area delivered w/e 26 Oct 2023

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Appendix - Stakeholder consultation list

Characteristic	Group name
Age	All Schools affected by the proposals
Disability	Disability Action Haringey
	Haringey Autism
	Haringey Learning Disabilities Partnership
	Haringey Wheelchair User Group
	JDA - deaf and hard of hearing
	Markfield Together for Inclusion
	Mind Haringey
Gender reassignment	Wise Thoughts
Haringey Council	Highways Network Management
	Transport Planning
	Waste Services / Veolia
	Schools & Learning Service
Other groups	All people all places
	Carers First Haringey
	Haringey Cycling Campaign
	Haringey Living Streets
	The Community Hub
Pregnancy/maternity	Gingerbread Haringey
	Haringey Families
Religion / belief	Any religious premises within the School Street have been informed and consulted through the public consultation
Sexual orientation	Haringey LGBT Forum
	Wise Thoughts
Statutory bodies	Arriva Buses
	Freight Transport Association
	London Ambulance Service
	London Fire Brigade
	London Travel Watch
	Metropolitan Police
	Road Haulage Association
	Transport for London

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Appendix G – Feedback and objection themes and officer's recommended response

Feedback theme ***As extracted from Table 3, Consultation & Feedback Report (Appendix A)***	**Count**	**%**	**Officer's recommended response**
Support the scheme	329	58%	Whilst officers do not consider the consultation to be a referendum on the proposals, officers note the significant level of support for the proposals.
Access restrictions a big problem for us and carers, taxis, trade deliveries, visitors. Exemptions needed	58	10%	The Council operates a free exemption system that allows certain groups of motorists to drive into a School Street during restricted hours. School Streets are limited to approximately 1.5hrs in the AM and PM, Monday to Friday, so in practice are only operational for a small proportion of the day. Furthermore, School Streets only operate during term time (~195 term days per year or 54% of the year). Any vehicle may drive out of a School Street during restricted hours, without the need for an exemption. Exemptions are available for residents and so are not unduly impacted. People living in the School Street with a disability are exempted in the same way as other residents. Organised disability transport e.g. needs for SEND and DALO transport is also exempted from the restriction. It is acknowledged that visitors and deliveries are not exempt during the restricted hours. The lack of exemptions for visitors and deliveries is crucial in achieving the objective of reducing congestion and reducing road danger outside the school gate. We recommend that visitors either walk or cycle their journey, park their car in a nearby street and walk the short distance to the school, or arrive outside of the hours of the School Street. Home deliveries should avoid driving into the School Street during operational times. Our School Streets are generally small and therefore, during operational times, delivery companies need to adapt: reduce, retime, reroute or remode. School Streets are designed to be compact, often affecting one or a small number of streets for limited distances. This means that delivery drivers that do arrive during the hours of operation should be able to park nearby and walk to their final destination. This

			also ensures we have a simple and practicable exemption system. It is noted that the number of parcels delivered in London is expected to double by 2030 and officers consider that areas immediately outside the school gate should be protected from this impact.
Traffic and parking congestion displaced to our and other already crowded roads	54	10%	The design approach of Haringey's School Streets is consistent with other London boroughs. There are now over 500 School Streets in the capital. Each school is carefully assessed to respond to the local situation, but a consistent design approach is applied which means that School Streets: • limit access to pedestrians and cyclists only in the street(s) outside the school gates i.e. no motor vehicles • only operate for a limited time each day which aligns with the times that the school gates open and close • operate in a logical section of street or streets (known as a zone) that removes or reduces the need for vehicle U-turns at the closure point, i.e. School Streets should generally start at a junction where vehicles can safely choose another route, if they find the street closed The size of our School Streets (i.e. the number of roads included) is guided by the location of the school gates in relation to the surrounding road network. In some cases, a short length of road will work effectively (e.g. a cul-de-sac or one-way street) but, in other locations, a more extensive network of streets will be required to have a similar effect. Whilst the road network varies between different School Steets, the objectives remain the same (ie encourage walking and cycling, active travel and improved air quality) and are limited to unclassified roads. Larger zones may (in some circumstances) make driving to school even less appealing (and can minimize concern about potential displacement) but a larger zone will also result in more exemption permits being issued. More exemption permits per zone will increase the frequency that school children and cars are on the road at the same time and therefore larger

			zones will reduce the road safety benefits that might be achieved through a smaller zone. It is also noted that School Streets create changes in travel behaviour. Studies have shown reductions in car use by pupils going to/from school and corresponding increases in walking and cycling.
A lack of evidence to support this / not necessary. Is it designed to raise revenue?	44	8%	In 2018, a landmark study of the impact of London's air pollution found children growing up in the capital and exposed to air pollution showed significantly smaller lung volume, with a loss of approximately five per cent in lung capacity. Research shows that those exposed to the worst air pollution are more likely to be deprived Londoners and from black, Asian and minority ethnic communities. According to Public Health England, London has higher rates of hospital admissions for asthma in under 19-year-olds compared to other regions in England. We also know that motor vehicles are the single biggest cause of London's air pollution. By restricting motor vehicles outside the school gate, the scheme most benefits vulnerable children who are particularly at risk from air pollution. Evaluation reports from earlier schemes in the borough and London-wide, indicate that motorised traffic not only decreases on the school street where the scheme has been implemented, but also on surrounding streets. They have also been shown to have an effect on traffic reduction outside of the operating period of the school street. This suggests a change in behaviour with people swapping mode of transport to active travel or public transport. In turn this reduces, not displaces congestion. School Streets are not the only tool to address poor air quality but is one of a range of measures that Haringey is implementing. It is not correct to say that the School Street is designed to generate revenue. The main objective of these School Streets is to bring health benefits to school age children, by encouraging increased levels of walking, cycling and wheeling to school and a reduction in road danger and pollution near the school gate.

			The moving traffic restriction that is associated with the School Street has been decriminalised (ie not enforced by the police) and therefore enforcement rests with the Council, as traffic authority. Penalty Charge Notice levels are not set by Haringey Council but are set at a London-wide level by London Council TEC. Our vision is for 100% compliance of the restriction as this would bring the greatest benefits to children. Income derived from PCNs associated with School Streets is used to offset the running costs of the scheme and in accordance with national legislation.
No reason given	27	5%	Noted. Where no reasons have been provided officers recommend that little weight should be given to this feedback theme.
Delays already affecting children and others who need to get to the school by car or bus	21	4%	The majority of households in Haringey do not have access to a car. Furthermore, most schools have small catchments where walking and cycling should be the default mode of travel to school. Data shows that the average Haringey primary catchment is less than 1km and average Haringey secondary is less than 1.5km. It is noted that where School Streets overlap bus routes, buses are exempt. However this is not the case for any of these projects.
Other suggestions	18	3%	Noted. All comments have been considered and, where appropriate and possible, design changes have been incorporated.
Lack of balance in the consultation and lack of consideration as to the wider impact	13	2%	The consultation document provided full details of the proposal and invited, in neutral language, any person to comment upon the proposal via a wide range of methods. The main objective of the scheme is to bring health benefits to school age children, by encouraging increased levels of walking, cycling and wheeling to school and a reduction in road danger and pollution near the school gate.

Appendix H

EQUALITY IMPACT ASSESSMENT

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

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act;
- Advancing equality of opportunity between those with a 'relevant protected characteristic' and those without one;
- Fostering good relations between those with a 'relevant protected characteristic' and those without one.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protect characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council's Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment	
Name of proposal	School Street Plan (2023)
Service area	Carbon Management, Placemaking and Housing
Officer completing assessment	Joe Baker / Tim Walker
Equalities/ HR Advisor	Joe Wills
Cabinet meeting date (if applicable)	13 June 2023
Director/Assistant Director	David Joyce / Rob Krzyszowski

2. Summary of the proposal

Please outline in no more than 3 paragraphs

- *The proposal which is being assessed*
- *The key stakeholders who may be affected by the policy or proposal*
- *The decision-making route being taken*

The proposed decision is to approve the new School Street Plan (2023) that is being presented to Cabinet in June 2023.

This new plan refreshes the previous School Street Plan (2020) and sets out the programme for delivery of School Streets between 2023 and 2026. The 2020 Plan was subject to an EqIA which was updated in 2022.

The new Plan:

- Notes the 23 School Streets projects that have been delivered to-date
- Identifies 38 more School Street projects (covering 58 educational establishments) that are considered feasible.
- Notes that delivery of these School Streets is subject to design, consultation and further decision making on the details
- Uses the same design techniques as previously agreed
- Introduces “Healthy School Zones” which are new measures around educational establishments that cannot (for technical reasons) have a School Street.

The key stakeholders are pupils, teachers, parents/carers, residents and businesses.

School Streets will restrict some motorists vehicular access to some road(s) during school drop-off and pick-up times. Those who are most likely to be impacted by proposed School Streets are those who need vehicular access to these roads during the times of operation. Those who are most likely to benefit from a School Street are those who want or need physical actively in a safe space, and those who can benefit from a calmer route to the school at the start of the day. Children and those with health conditions which make them more vulnerable to health impacts from poor air quality will also benefit. Those who are likely to be negatively impacted by proposed School Streets are those who need or want vehicular access to these roads during the times of operation.

For measures to reduce the impact of poor air quality in and around an educational building these may include measures such as Living Walls (selected plants growing along boundary fences) and mechanical plant (to filter internal air quality). Alongside improving existing equipment on site (such as boilers) to emit fewer pollutants. Those who are most likely to benefit from Healthy School Zones are those who use the schools and it grounds. There are expected to be no groups negativity impacted.

Appendix G

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

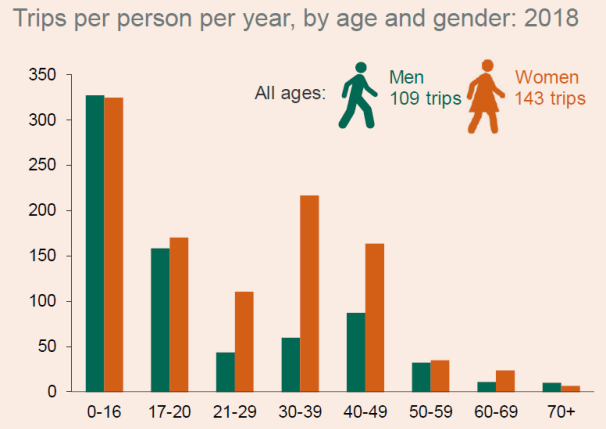
Protected group	Service users	Staff
Sex	• Census 2021 • Haringey borough profile data • Haringey school data. • Annual transport survey by the UK government • Scottish Government report	N/A
Gender Reassignment	• Haringey Borough profile data	N/A
Age	• Haringey borough profile data • Additional data comes from the UN and the UK transport survey	N/A
Disability	• Haringey borough profile data	N/A
Race & Ethnicity	• Haringey borough profile data • Mayor of London	N/A
Sexual Orientation	• Haringey borough profile data	N/A
Religion or Belief (or No Belief)	• Haringey borough profile data	N/A
Pregnancy & Maternity	• Haringey borough profile data	N/A
Marriage and Civil Partnership	• Haringey borough profile data	N/A

Appendix G

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?

Sex

Data from Scotland and the UK Transport Survey finds that women were more likely to escort children to school than men. We can assume that this is also true in Haringey.



The graph above, from the UK Transport Survey, demonstrates that women between 21-49, who are the group most likely to have primary school aged children, make more trips on average than men. When taken with the data showing that women are more likely to accompany children on the school run, this suggests that women are making more of the school run trips in Haringey than men.

Therefore, women will be more affected by this proposal than men, as they may have to change the way they get to school.

Air quality exposure is worse inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Implementing the School Street Plan will therefore benefit these groups by improving air quality at the schools with the worst air quality and improving road safety at schools with the worst road safety issues.

Implementing a Healthy School Zone will benefit these groups by improving air quality in and around the schools and reducing exposure levels.

Gender Reassignment

Air quality exposure is worse inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Implementing the School Street Plan will therefore benefit these groups by improving air quality at the schools with the worst air quality and improving road safety at schools with the worst road safety issues.

There is no data to suggest that School Streets or Healthy School Zones will disproportionately affect anybody who is undergoing or has undergone gender reassignment.

Age

These proposals will affect people with primary school aged children or children of this age group in their care, residents and businesses near the schools, teachers, the children who attend the schools and vehicle owners who use the road(s) for any other purpose.

Air quality exposure is worse inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Data on air quality shows that it is particularly harmful for children and elderly people.

Children under the age of 12 have the highest percentage of pedestrian fatalities. The peak time for pedestrian injuries from vehicles is during the morning rush hour, which includes the school run. Therefore, young children will benefit most from the road safety improvements.

Implementing the School Street Plan and Healthy School Zones will therefore benefit these groups by improving air quality at the schools with the worst air quality, improving road safety, and reducing exposure levels to pollutants.

Disability

Air quality exposure is worse inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Implementing the School Street Plan will therefore benefit these groups by improving air quality at the schools with the worst air quality and improving road safety at schools with the worst road safety issues.

School Streets have the potential to affect a disabled resident's access to their road or property. It would also affect any disabled person who needs vehicle access to the road for other reasons, such as disabled pupils being driven to the school. The plan includes recommendations for those with blue badges, who require access to a property within the School Street, to be exempt from the School Street restrictions to mitigate this. Vehicles transporting SEN students to the school will also be exempt from the restrictions.

Implementing a Healthy School Zone will benefit these groups by improving air quality in and around the schools and reducing exposure levels.

Race & Ethnicity

Data shows that BAME individuals are more likely to be exposed to poor air quality in London than those not from BAME groups. We also know that poor air quality is more common in the south and east of Haringey, whilst the proportion of BAME residents is also higher in the east of Haringey. Therefore, we can surmise that BAME communities are presently more exposed to poor air quality in Haringey than non-BAME groups.

Air quality exposure is worse inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Implementing the School Street Plan will therefore benefit these groups by improving air quality at the schools with the worst air quality and improving road safety at schools with the worst road safety issues.

Implementing a Healthy School Zone will benefit these groups by improving air quality in and around the schools and reducing exposure levels.

Sexual Orientation

Air quality exposure is worse inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Implementing the School Street Plan will therefore benefit these groups by improving air quality at the schools with the worst air quality and improving road safety at schools with the worst road safety issues.

There is no data showing that School Streets or Healthy School Zones will disproportionately affect people as a result of their sexual orientation.

Religion & Belief (or No Belief)

Air quality exposure is worse inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Implementing the School Street Plan will therefore benefit these groups by improving air quality at the schools with the worst air quality and improving road safety at schools with the worst road safety issues.

There is no data showing that School Streets or Healthy School Zones will disproportionately affect people as a result of their sexual orientation.

Pregnancy & Maternity

Air quality exposure is worse inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Implementing the School Street Plan will therefore benefit these groups by improving air quality at the schools with the worst air quality and improving road safety at schools with the worst road safety issues.

No data shows that School Streets or Healthy School Zones will disproportionately target those who are pregnant. However, more mothers are likely to be taking children to and from schools. Alongside this, as explained in section 5, the effects of School Streets on those who are pregnant has been taken into consideration during the development of the School Street Plan.

Marriage and Civil Partnership

Air quality exposure is worse inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Implementing the School Street Plan will therefore benefit these groups by improving air quality at the schools with the worst air quality and improving road safety at schools with the worst road safety issues.

There is no data to suggest that those in a marriage or civil partnership will be disproportionately affected by the School Streets or Healthy School Zones proposals.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqIA guidance

During the trial of the School Streets launched to date, each project has been subject to statutory and informal consultation with key stakeholders: schools, residents living near the schools, parents and carers who transport the children to school and the school itself.

Each future School Street and Healthy School Zone will have its own engagement and consultation process whereby all people affected by a scheme have input into its delivery.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

Feedback from Haringey's first School Street Plan has informed the new School Street Plan. This feedback has been used to better understand how a scheme can impact on individuals with protected characteristics and these lessons have been embedded into the Council's approach moving forward.

For example, the School Street Plan recommends ANPR camera enforcement in the vast majority of School Streets, which allows all residents within the School Street to leave the zone during the times of operation. This is in response to feedback from residents, school staff and officers about the bollard system at Lordship Lane. ANPR cameras are a way to ensure those with protected characteristics who live within a zone are not negatively impacted by the School Street scheme.

Analysis of exemption data shows that approximately 14% of exemptions have been issued to motorists with a Blue Badge or have a disability that prevents the parents, carer or pupil from walking, cycling or wheeling to school. This indicates that the exemption system is working for those who most need it.

The final measures recommended by the Healthy School Zone will be discussed and confirmed with the school. Any identified local needs of the school's community will be addressed through this process.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqIA guidance

1. **Sex**

By increasing active travel and improving road safety at schools it is anticipated that women, who are currently underrepresented among cyclists, will feel more confident and increase uptake of these modes.

Improving air quality and road safety in and around our schools will have a positive net benefit for women in Haringey as national data shows that women are more likely to escort children to school than men, and be teachers within the establishments.

Positive		Negative		Neutral impact		Unknown Impact	

2. **Gender reassignment**

Implementing School Streets and Healthy School Zones is not expected to have any specific impact for those who have undergone or who are undergoing gender reassignment.

If any inequity in delivery is identified, steps will be taken to rectify this.

Positive		Negative		Neutral impact		Unknown Impact	

3. Age

It is anticipated that delivering School Streets and Healthy School Zones will benefit young people who will increase levels of active travel, be safer from cars and benefit from improved air quality. It is also anticipated that this group will benefit from the roads outside of their school being quieter, improving their confidence to walk and cycle

By improving the public realm, and cleaner air there is likely to be more social interaction which would lower the levels of social isolation that predominantly older people feel.

Positive		Negative		Neutral impact		Unknown Impact	

4. Disability

It is anticipated that those with a disability will benefit from the improved air quality that School Streets and Healthy School Zones bring, the more accessible and public realm focussed improvements associated with School Streets and Healthy School Zones and from there being fewer cars on the road.

There may be negative impacts associated with restricting vehicle access to certain roads at certain times, however, this can be mitigated by allowing those with a blue badge who require access to apply for an exemption – allowing them access even during the times of restriction.

Exemptions for Blue Badge holders are provided where access is required. “Access” means those who require access to premises within the street. Exemptions are not provided for those blue badge holders motorists who wish to pass through a School Street as a convenience when the journey could be taken via another route. This exemption is also available for school staff with a blue badge who need to drive into the School Street.

Exemptions for School Streets are also provided for vehicles that are used to transport children or adults who have disability access requirements. The restrictions apply to taxi and private hire vehicles and we advise residents to arrange taxi trips outside of the restricted times. Whenever specific taxi or private hire vehicles are used on a regular basis by a Blue Badge holder we will consider the exemption on case by case basis.

Positive		Negative		Neutral impact		Unknown Impact	

5. Race and ethnicity

BAME communities in Haringey are more likely to live in areas with poor air quality. Therefore, implementing the School Street Plan will have a positive impact on BAME communities by improving air quality.

Positive		Negative		Neutral impact		Unknown Impact	

6. Sexual orientation

It is anticipated that implementing the School Street Plan will have a neutral impact on those whose sexual orientation is a protected characteristic. School Streets and Healthy School Zones will not impact or affect this group in a different way to any other group.

Positive		Negative		Neutral impact		Unknown Impact	

7. Religion or belief (or no belief)

It is anticipated that the School Street Plan will have a neutral impact based on religion or belief, as there is no evidence that implementing School Streets will disproportionately impact anyone because of their religion or belief.

Ensuring suitable levels of access to places of worship will be necessary during the implementation phase of specific School Streets.

Positive		Negative		Neutral impact		Unknown Impact	

8. Pregnancy and maternity

Implementing School Streets and Healthy School Zones will have a positive impact on pregnant people. This is because poor air quality is more harmful to pregnant people.

There are also negative impacts associated with School Streets for pregnant people. This is because pregnant people are less able to benefit from active travel, may have mobility issues and those living in School Streets zones may need visits from health care professionals. The Council will endeavour to ensure any School Street scheme does not result in disproportionately negative impacts for this group and implement appropriate mitigating measures.

School Streets and Healthy School Zones are a proportionate measure to achieve a legitimate aim and the benefits associated with improved air quality will outweigh any negative impacts.

Positive		Negative		Neutral impact		Unknown Impact	

9. Marriage and Civil Partnership

School Streets and Healthy School Zones will have a neutral impact on marriage and civil partnership. People in a marriage or in a civil partnership will be impacted the same by this policy.

Positive		Negative		Neutral impact		Unknown Impact	

10. Groups that cross two or more equality strands e.g. young black women

Women are more likely than men to escort children to school. Therefore, improving air quality by schools is likely to have a positive impact on BAME women in Haringey. BAME pregnant women and BAME young women will therefore stand to benefit from the improvements to air quality and road safety.

Religious people with disabilities who need to access a place of worship via motor vehicle in the School Streets and Healthy School Zones during the times of operation could be disadvantaged by the schemes. However, the policy on exemptions allows for enough leeway to grant exemptions in these cases. Furthermore, most zones will not have a place of worship within them. In the zone(s) that do, this issue should be identified before beginning consultation and should be mitigated to ensure that a scheme does not negatively impact this group. Religious organisations within or near the zone will be engaged and have opportunities to request exemptions for these individuals before a scheme is implemented.

We know that certain transport inequalities exist in Haringey. In summary, School Streets promote active travel, improve air quality and have potential to reduce inequalities that affect protected groups including children and young people and BAME communities. However, some groups may not be able to benefit from engaging in active travel, including people with mobility-related disabilities, some older people, and pregnant people. These groups may be negatively impacted by reduction in private car use. The School Street Plan does not promote a complete ban on vehicle access to the zones due to the inequalities that exist and makes sure these groups are considered in developing fair policies.

Outline the overall impact of the policy for the Public Sector Equality Duty:

- **Could the proposal result in any direct/indirect discrimination for any group that shares the relevant protected characteristics?**
- **Will the proposal help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not?**

  This includes:

  a) **Remove or minimise disadvantage suffered by persons protected under the Equality Act**
  b) **Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups**
  c) **Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low**

• **Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?**
- No. There will be no direct discrimination as a result of implementing School Streets and Healthy School Zones. Each scheme will be unique and any issues that are identified will be assessed on a case-by-case basis. - Most of the protected groups are experiencing the negative impacts of poor air quality at a disproportionate rate and therefore School Streets will provide an overall positive. - Those belonging to a protected group, such as disabled residents, will be accommodated by the School Streets scheme and their access to their residence will not be negatively impacted. - In all instances, where a Penalty Charge Notice (PCN) is issued to a vehicle that contravenes the traffic restriction, there is a formal appeals process in place. This allows motorists to challenge the PCN if they believe an exemption applied or that there are mitigating circumstances that need to be considered.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EqIA guidance

Outcome	Y/N
No major change to the proposal: the EqIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.	Yes
Adjust the proposal: the EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly set out below the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	No
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	No

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

Impact and which relevant protected characteristics are impacted?	Action	Lead officer	Timescale

Disabled residents may need vehicle access to a property during the times of operation of a School Street	Continue to issue exemptions to blue badge holders who require access into a School Street Support disabled individuals in the School Street to apply for blue badges if they do not already have one.	Highways and Parking	Ongoing
Pregnant or elderly people may have increased reliance upon visits from healthcare professionals	Continue to issue exemptions for medical professionals who require access into a School Street to reach patients.	Highways and Parking	Ongoing

Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.

All groups, including those with protected characteristics, will have their access to the roads at each school limited for certain periods. However, those who have a blue badge will maintain access subject to issuance of an exemption which can be applied for.

In all instances, where a Penalty Charge Notice (PCN) is issued to a vehicle that contravenes the traffic restriction, there is a formal appeals process in place. This allows motorists to challenge the PCN if they believe an exemption applied or that there are mitigating circumstances that need to be considered.

Therefore, the other groups with protected characteristics who will have their access restricted will not be negatively impacted in a disproportionate or discriminatory way. These groups will have to walk slightly further to the school gates, along with all other groups, except those who require vehicle access for mobility reasons. All groups also stand to benefit from the improvements of air quality and road safety, which often disproportionately affects people with protected characteristics.

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

- **Concerns raised by the schools.** This includes monitoring the impact on any protected groups such as accompanied transport systems for vulnerable students or those with mobility needs. The Council will engage with the school at a minimum annually to offer feedback on the School Street.
- **Number of Blue Badge Users applying for exemptions.** This will ensure that communications to road users within / using the School Street are aware of exemptions that they can apply for.

- **Concerns raised by residents.** To ensure that all communications highlights that those with mobility concerns are aware of exemptions.
- **Air Quality Levels.** The Council will continue to monitor air quality levels outside the schools to ensure that the benefits of the School Streets are measured.

7. Authorisation	
EqIA approved by Rob Krzyszowski (Assistant Director)	Date 31/05/23

8. Publication *Please ensure the completed EqIA is published in accordance with the Council's policy.*

Please contact the Policy & Strategy Team for any feedback on the EqIA process.

Report for: Cabinet, 6 February 2024

Title: Haringey SEND Top Up and High Needs Funding Banding (post consultation)

Report authorised by : Ann Graham, Director: Children's Services

Lead Officer: Jackie Difolco, Assistant Director: Early Help, Prevention and SEND

Ward(s) affected: All

Report for Key Decision

1. Describe the issue under consideration

1.1 This report proposes that changes are made to the funding arrangements to support children and young people with Special Educational Needs and Disabilities (SEND), who attend early years provision (including school nurseries, child minders, PVI nurseries or other forms of funded early years provision) in Haringey, or mainstream or special school settings in Haringey (either mainstream or academy status), and seeks Cabinet approval for the proposed changes.

1.2 This report proposes that the changes made are monitored by Haringey SEND Executive with a formal review scheduled for January 2025 following implementation to review the impact on children and young people considering equalities data and school finances within this review.

2. Cabinet Member Introduction

2.1 Funding to support children with special educational needs and disabilities is part of the Dedicated Schools Grant (DSG) from central government and is located within the High Needs Block (HNB). Ensuring these resources are allocated fairly and transparently to support all children with special needs is a critical task and has underpinned this report.

2.2 In entering into the Safety Valve agreement with the DfE, and as a condition of participation, the Council committed to review the way in which resources for children with SEND were allocated. This has led to a review of the funding structure involving bandings and top-up allocations to ensure these are fair, open, and transparent.

2.3 The review has been extensive, detailed and wide ranging, and officers have worked with many vital and key stakeholders over a long period of time to develop new proposals with the aim of allocating funding more equitably. The working review group has included parents and carers, representatives from mainstream and special schools, specialist teaching staff, health colleagues and education psychology. The aim has been to develop two sets of banding descriptors, designed to meet the needs of children and young people with SEND more effectively and accurately than the current system.

2.4 This has been a long process, including a period of public consultation. The proposals in this report are now ready for Cabinet consideration and I am asking Cabinet to approve the new banding descriptors which will underpin SEND funding to our schools and other providers.

3. Recommendations

3.1 That Cabinet approves the proposed changes to the banding descriptors used to allocate funding to children in Early Years and of statutory School age in Haringey as outlined within section 4.12 of the report, Appendix Five: Proposed Early Years Inclusion Banding Descriptors and Appendix Six: Proposed SEND Bandings for School aged children and young people

4. Reasons for decision

4.1 Haringey Council has a statutory duty to deliver support to children and young people with SEND. These responsibilities are described in the Children and Families Act 2014 which sets out the Local Authority's duties to assess children and young people's SEND needs and to make provision to meet these needs.

4.2 Funding to support children and young people who require additional support to meet their SEND needs is allocated to Haringey Council via the Dedicated Schools Grant (DSG). Included in the DSG, is the High Needs Block which is specifically allocated to make financial provision to meet the identified SEND needs of children and young people.

4.3 Funding for children and young people with Education and Healthcare Plans (EHCP) in mainstream schools is comprised of three elements. The first element is the Age Weighted Pupil Unit (AWPU - the individual money for pupils) which is approximately £4,000 per child; the second element is the notional £6,000 Special Educational Needs (SEN) support money. These elements are allocated directly to schools from their DSG allocation based on the national schools funding formula. If a child has an EHCP, additional financial top-up is allocated by the Local Authority from the High Needs Block. The SEND Bandings are the way in which the Local Authority provides transparency about the amount of top-up money being allocated and the rationale for this. This is a local arrangement, and each Local Authority has its own system based on its evaluation of local need and allocation of funding within the DSG.

4.4. Funding for special schools is comprised of two elements; place funding (£10,340) which is paid for every child at a special school and top-up money. In Haringey this is either £24,000 or £27,000 depending on where the child attends. All the money for special schools comes from the High Needs Block of the DSG. Top-ups for special schools are allocated and agreed locally. At present Haringey only has one band of top-up to Special schools so the amount of money allocated from the High Needs Block to support children in special schools is based not on needs of the child but on the type of school they are attending.

4.5. The SEND top-up funding for Early Years is applied for by settings when they identify a child with additional needs. Currently the setting can apply for either medium or high top up funding which is paid at a different rate per hour. The Local Authority has a number of commissioned SEND places for Early Years in the Nursery Schools, LA maintained Children's Centres and Broadwater Farm which are for high needs children and paid at a higher rate than the high top up funded children. As part of our Early Years Strategy, we are reviewing all the funding rates to ensure that the process is equitable and fair for all children in Haringey.

4.4 Haringey Council is part of the Safety Valve Programme which is a transformation programme designed to assist local authorities in reducing overspend in their High Needs Block expenditure and achieve an in year balanced budget. Haringey has agreed a Safety Valve deal until 2027-2028, with 18 projects designed to firstly, improve outcomes for children and young people with SEND and secondly, deliver services within a balanced budget. If successful, this will reduce the projected deficit of £80m to £30m and draw down additional funding of £30m

to clear the projected deficit. As of 1 April 2023, the deficit was £23.8m. Based on the strength of, and confidence in the proposals within our plan, Haringey has received £11.96m to date which has reduced the cumulative deficit to £11.8m. As of December 2023, Haringey is reporting an in year overspend of £2.22m which is within the financial target set for 2023-2024 and is forecasting cumulative surplus of £0.1m by 2027/28. Haringey has successfully drawn down a further £2m for 2023-2024 which is 66% of the funding available to date within this year. It is anticipated that we will draw down 100% of the funding to offset against the accumulative deficit as per our agreed Safety Valve plan for this financial year.

4.5 As part of the conditions of participation within the Safety Valve programme Haringey council have committed to review their bandings and top-up allocations to ensure that these are fair, open and transparent and calculated within the existing budget allocated to the Council to meet such needs.

4.6 Accordingly, Haringey Council has worked with key stakeholders, including but not exclusively, parents and carers, schools, specialist teaching staff, health colleagues and education psychology to develop two sets of banding descriptors, which are designed to meet the needs of children and young people with SEND.

4.7 Appendix Four describes the proposed new Banding descriptors for children aged 0-5 in Early Years settings. Key changes are outlined as follows:

a) These bandings are applied fairly and equally across all early years settings in Haringey.
b) there will be an increase from 2 to 4 Bands allowing for a better description of children's needs.
c) that these bandings are applied until children reach the end of the Early Years Foundation stage allowing support for children to be extended until the age of 5 in line with developmental stages with regular 6 monthly progress reviews.
d) that these bandings are funded jointly from the Early Years block and the High Needs Block of the Dedicated schools Grant (DSG) to ensure that sufficient funding is available to support children at the earliest point of intervention but that the amount of support from the High Needs Block (HNB) is reviewed in accordance with the terms and conditions the council's Safety Valve agreement and what is allowable within the HNB grant and conditions.
e) bandings will be agreed at 'Early Years Review' meetings held by the Early Years provider and parent and based on evidence supplied and supported by relevant health and local authority education specialists. The decision to award the top-up band will be agreed at this meeting and subject to a termly review to ensure parity and equity of funding across settings.
f) the amount of funding which each of the individual 4 bands is allocated will be calculated annually based on the financial allocation within the DSG and will be published annually in April to allow for budget setting for settings by academic year.
g) each band will be clearly described with the highest financial award being allocated to children with the most complexity of need.

h) it is proposed that the services move incrementally into the new system over a 3-year period to ensure minimum disruption to children and settings, with the new system being incrementally introduced through settings as new children are assessed.

4.8 Appendix three describes the new bandings formulations for children and young people aged 5-19 who attend a mainstream or special school located within the London Borough of Haringey (either maintained or academy) but not Independent Schools (which are subject to different funding arrangements). Key changes are outlined as follows:

a) There will be an increase from 4 to 8 bands with 3 bands describing SEN support available to children prior to consideration of an education, health and care plan (EHCP),

b) That the Bandings are used to describe children and young people's needs on a continuum.

c) That there is an additional band introduced which allows for additional financial support to schools to allow for early intervention and support, to prevent a child's needs from escalating further and without the need for an EHCP.

d) The amount of money allocated to each of the individual bands is calculated annually based on the financial allocation within the High Needs Block of the Designated Schools Grant and each banding amount will be published annually in April to allow for budget-setting for settings by academic year. The methodology for this calculation and oversight of this is via a Stakeholder Steering Group of schools, Local Authority SEND Leads and Haringey SEND Power (Parent Carer Forum), this will be repeatedly annually. It is not anticipated that any school will be disadvantaged by this methodology, but should schools receive lower funding than previous years the Local Authority will work with the Head and school business managers to understand risks and make mitigation for this. The intention is to provide a fairer distribution of resources, and also create resources to support the Local Authority's intention to provide early intervention and support.

e) Bandings and top-ups will be reviewed at each child's SEN or EHCP annual review, in accordance with the SEND Code of Practice and Children and Families Act 2014.

f) The amount of money allocated to each child (Top-Up funding) will be agreed by Haringey SEND Panel based on considering the evidence and recommendations of the parents, Special Education Needs and Disability Co-ordinator (SENDCO) and specialist education professionals who are responsible for supporting the child or young person.

g) During the current transition year, September 2023 – August 2024, every child or young person who currently has top-up funding from the High Needs Block of the DSG will have an EHCP audit. A new banding allocation will be made based on the needs evidenced within the child or young person's existing plan, and any banding which deviates from the existing scale by 2 or more points will be taken to Haringey SEND Panel for further moderation following an Annual Review.

4.9 These policy changes were subject to public consultation via an on-line consultation form published on the Haringey SEND Local Offer website for a period of 8 weeks to ensure that families, schools and other parties have sufficient time to respond to the proposed changes. The consultation ran from 5th October until 1st December 2023.

4.10 The consultation, whilst not a statutory duty, was promoted via the SEND Newsletter, Special Schools and Parent Carers' Forum and a range of other relevant networks within the education, health and care sector. Appendix Three: Bandings and Top Ups Consultation Report describes in detail the work which took place to undertake the consultation and the responses

recorded via the web-pages. The consultation responses indicated broad agreement with the proposed changes with some useful suggested amendments and indicated that SEND consultations, whilst offering an outlet for expressing wider discontent in the system also offer a useful opportunity for the Local Authority to ensure that it has access to wider opinions and a chance to develop good practice informed by both practitioners, parents and carers.

4.11 Consultation responses were mainly received from parents and carers of children and young people with SEND with some comments from practitioners. A summary of the key responses are outlined below. Refer to: Appendix Three: Bandings and Top Ups Consultation

feedback and responses. As a result of the responses to consultation amendments have been made to the original Bandings Framework.

4.12 For ease they are marked in red on Appendix Five and Six (Proposed Bandings) A summary of the key responses are outlined below.

a) Recognition of the wider SEND improvement agenda of which these Bandings form a part.
b) Inclusion of the importance of impact as well as severity of Hearing Loss in determining children's needs in this area.
c) Recognition and consideration of the impact of 'masking' behaviours for children with social communication difficulties.
d) Recognition of the interface between the Early Years Bandings (Which apply to children in earlier stages of their development assessed by their good levels of development) and the school-age Bandings which assess older children's ability to function within a school-based learning environment and achievements in relation to the National Curriculum (including entry-level learning).

4.13 EHCPs will continue to clearly outline in detail, the provision required for children and young people with sufficient flexibility to meet individual and assessed needs which will be monitored through the statutory annual review process.

4.14 The financial envelope for the High Needs Block Grant is based on a national formula based on pupil numbers. Funding allocations to the bandings are agreed by the Schools' Forum. Where schools may be adversely affected financially as a result of the new bandings, financial modelling support will be provided by Haringey Schools Finance to Schools to assess the impact of any changes and any options to minimise impact. This may include adopting a phased incremental approach and/ or a review of pupil numbers.

5. Alternative options considered

5.1 Consideration has been given to retaining the bandings in their current form with no changes made. This option is not considered to be sustainable in light of the feedback from stakeholders regarding developing a more equitable system. This option is not sustainable and requires review in the context of the Safey Valve programme.

6. Background information

6.1 Haringey Council is working hard to transform their SEND Services through a substantial improvement programme that is underpinned by Haringey's SEND Strategy 2022 - 2025. During the academic year 2021-2022, the Council commissioned the ISOS partnership (research and advisory organisation supporting public sector organisations) to complete a review of our local SEND funding arrangements with our stakeholders. During this review the current bandings and top-up arrangements was identified as an area for improvement. (Refer to Appendix One: Existing early Years Bandings and top-Ups and Appendix Two: Existing 0-19 Bandings and Top-ups (mainstream Schools)

6.2 The current banding descriptors, funding and decision-making arrangements were subject to internal review and external scrutiny, with queries about the lack of specificity within the current bandings framework being identified. Further concerns were raised by schools and parents who felt that the current bandings were limited in scope, that decision-making in relation to resource allocation lacked clarity and that the schools were not being transparently funded to meet the needs of children. Moreover, a number of contingency funding arrangements

had evolved to address inequities within SEND systems, including the distribution of pupils with SEND across schools in the borough. Therefore, top-up funding
allocated to schools is being supplemented by additional monies via a SEND contingency fund which pays an additional amount of High Needs Block funding to schools with a disproportionate and higher than Haringey average number of EHCP's per school.

6.3 During the academic year 2022-2023, the ISOS partnership have held a series of meetings with a stakeholder steering group made up of SEND specialists including parents and carers, from across Haringey informing the development of a new 'Bandings System' based on examples of best practice nationally. This steering group has overseen the development of the new Bandings Framework and developed the governance proposals to support implementation.

6.4 Moreover, the stakeholder steering group has been supported by a series of wider stakeholder groups and meetings including a specialist Early Years task and finish group and specific co-production events with representatives from Special School Headteachers, Haringey SEND Power and other SEND experts, including Health professionals. These groups have met regularly including a full day event in November 2022 to complete the Bandings formulation.

6.5 The proposed Bandings have been tested during the latter part of academic year 2022-2023 in a range of provisions including primary, secondary and special school settings, leading to further revisions and refinement. (Refer to Appendix Four: Proposed Early Years Bandings and Appendix Five: Proposed SEND Bandings for School aged children and young people). During Autumn term 2023 every school in Haringey was trained in the new Bandings formulation and applied an Audit to understand the impact of the new Bandings.

6.6 For the early years banding model, early years settings have been involved in a series of working groups which have met throughout the academic year 22/23 and are scheduled for 23/24 with the new modelling based on the proposed new Bandings being tested in all the settings represented at the Early Years Banding and Top-Up Steering Groups.

6.7 The proposed new Bandings indicated the range and complexity of children with SEND in Haringey schools and in general were welcomed by schools and settings as providing more detailed understanding of children's needs, with the child's overall Banding being allocated according to the highest needs recorded.

6.8 The Bandings and Top-ups work have been informed by the following agreed principles and values**:**

a) **Universality:** There should be a consistent set of principles and methodology for allocating SEN top-up funding across all phases and settings.

b) **Fairness:** There should be recognition that the high needs block allocation for Haringey is finite, and that decisions about funding in one area affect resources available to another. strategic and operational decisions about SEN funding should be made transparently, consistently and fairly, to ensure that resources are targeted at where there are the greatest needs, ensuring that the LA meets it statutory duty to secure provision within section F of a child and young person's EHCP.

c) **Ease of use:** The approach to SEN funding in Haringey, and the tools used to inform and reach decisions, should be straightforward to explain, concise and easy to use.

d) **Mutually-reinforcing:** The SEN funding system should align with guidance for when to carry out EHC needs assessments and the agreed definition of "ordinarily available provision" in Haringey. It should also align with the threshold for being allocated a place in a special school.

e) **Needs led:** The approach to banding should be based on clear descriptors of need that are easy to understand. These could be complemented with examples of how these needs might be met in a Haringey school.

7. Contribution to the Corporate Delivery Plan 2022 – 2024 High Level Strategic Outcomes

7.1 Theme 3: Children and young people

- Outcome 1: Best Start in Life – The first few year sof every childs life will give them the long-term foundation to thrive
- Outcome 2 Happy Childhoods - All children across the borough will be happy and healthy as they grow up, feeling safe and secure in their family networks and communities.
- Outcome 3 Successful Futures - Every young person, whatever their background, has a pathway to success for the future

7.2 This work contributes to Haringey's SEND Strategy 2022- 2025, which contains 5 priorities, of which Priority One identifies the need to 'Support Children at the Earliest Opportunity to access the intervention they need to achieve and thrive and priority five within Haringey Early Years Strategy 2022 - 2026: Every child should be able to have access to the high quality inclusive provision that is tailored to their needs'

8. Carbon and Climate Change

8.1 There are no implications as a result of this decision.

9. Statutory Officers comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

Finance

9.1 In 2022/23 The Council spent £39.5m from the Dedicated Schools Grant on SEND top-ups in Early Years, Primary, Secondary and Specialist Schools in Borough. The Council spends an additional £1.825m on SEND contingency funding which has been put in place to address inequities within the current funding arrangements.

9.2 The Council, in accordance with the Safety valve agreement must reduce overall spend from the Dedicated Schools Grant by £47.8m over the 5 years of the programme of which

£10.1m will be delivered from realigning SEND Bandings and Top-ups.

9.3 It is proposed that each Banding is reviewed annually to ensure that the Council spend remains within the allocated financial envelope and to prevent further overspend within the Dedicated Schools Grant and breach of the Safety valve conditions.

Procurement

9.4 Strategic Procurement notes the contents of this report and confirms there are no procurement related matters that would prevent the Council agreeing the recommendations stated in this report.

9.5 The support for children and young people with SEND is set out in Part 3 of the Children and Families Act 2014 and in statutory guidance Special Educational Needs and Disability Code of Practice. There is nothing in the legislation, SEND Regulations, or the SEND Code of Practice which prevents local authorities from administering high needs SEN funding through a system of bandings.

9.6 Section 42 of the Children and Families Act 2014 provides that a local authority must secure the provision identified in an EHC plan. The local authority must therefore ensure that the funding provided for each child within an EHC plan is sufficient to meet the special educational needs specified in section F of a child or young person's plan. The bandings must offer flexibility to officers to increase the allocated level, if necessary, to fund additional provision above the allocated band.

9.7 The local authority has conducted an 8-week consultation exercise the results of which is contained in the cabinet report and appendices. Cabinet should give due regard to the responses to the consultation before considering the recommendations contain in this report.

Equality

9.8 The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

a) eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.
b) advance equality of opportunity between people who share protected characteristics and people who do not.
c) foster good relations between people who share those characteristics and people who do not.

9.9 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. The first part of the duty applies to marriage and civil partnership status only.

9.10 Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic

9.11 The proposed decision is to approve the proposed changes to the current SEND Bandings and Top-ups and monitor the changes via the Haringey SEND Executive.

This will affect all children and young people with SEND and Schools and early years settings in Haringey.

9.12 Accordingly, this policy will affect the following groups who have protected characteristics: Children and young people; Children and young people with SEND; and adults with disabilities. A full Equalities Impact Assessment (EQIA) was conducted and showed that boys and people from Black, Black British or Caribbean ethnic groups are overrepresented in the SEND population. The objective of the proposed decision is to improve the Council's policies and processes in relation to the provision of SEND Bandings and Top-ups by providing clear guidance, better descriptions of needs, and child-centred allocations of resources from within the allocated financial resources (The Designated Schools Grant).

8.13 This will lead to better access, early intervention and support for children, young people and adults with disabilities – including those with protected characteristics overrepresented in the SEND population – helping address issues raised in relation to inequity of provision across the Borough and lack of transparency in relation to decision making and allocation of resources. The proposed decision therefore represents a measure to:

a. support fair, open and transparent decision making about the allocation of resources to support children and young people with SEND according to their needs,
b. and regardless of which setting they are educated within.

8.14 Where schools may be adversely affected financially as a result of the new bandings, financial modelling support will be provided by Haringey Schools Finance to Schools to asses the impact of any changes and options to minimise impact.

8.15 As part of the public consultation on the proposals to change the current policy, provisions were made to ensure that families, schools and other parties have sufficient time to respond to proposed changes. Accessibility needs were accommodated by providing translated and/or large print copies of the consultation on request. The consultation was promoted so as to maximise reach and seek the views of interested families and parties as far as possible.

8.16 A full equalities impact assessment has been completed to understand the key groups who will be affected by the policy, how they will be impacted by it, and any mitigations that might be needed in order to ensure that the public sector duty is met. Refer to Appendix Seven: Equalities Impact Assessment. The Council will continue to collect demographic data on service users in order to identify any inequalities in service provision that may arise and to inform future equalities analysis.

10. Use of Appendices

Appendix One: Existing early Years Bandings and top-Ups
Appendix Two: Existing 0-19 Bandings and Top-ups (mainstream Schools)
Appendix Three: Bandings and Top Ups consultation report
Appendix Four: Summary of Top Ups and bandings consultation feedback and responses
Appendix Five: Proposed Early Years Inclusion Banding Descriptors
Appendix Six: Proposed SEND Bandings for school aged children and young people
Appendix Seven: Equalities Impact Assessment

11. Local Government (Access to Information) Act 1985 - Not applicable

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Appendix One: Existing early Years Bandings and top-Ups

Integrated Service for Special Educational Needs and Disabilities

Banding of Support Education Health and Care Plans in Pre- School Aged Children August 2021

Band A	Band B	Band C	Band D
Specialist school or 570 hours of support per year	**Funding equivalent to an Early Support Place - £6852 per year***	**Funding equivalent to High level inclusion funding or £3938 per year**	**Funding equivalent to Medium level inclusion funding or £1112 per year**
The child **will have multiple complex** needs in all areas of learning, physical access and adjustment of information presented. The child will be unable to access the curriculum without adult support at any time and cannot be facilitated effectively by peer support. The setting staff will need to carry out programmes of therapy and teaching in the absence of the specialist practitioners on a daily basis. The child might otherwise be attending a special school or be attending a special school in the future.	The child **will have complex needs** that require adjustments in many areas of learning, access and physical adjustments. The child will have programmes established by specialist practitioners' that need to be carried out by setting's staff several times a session. The child will be able to access play activities independently or with low levels of support for very short periods of time.	The child will have **access needs that require adjustments** in several areas of learning, information access and physical adjustments. The child will have programmes established by specialist practitioners' that need to be carried out by setting's staff daily. The child will be able to access play activities independently or with low levels of support for short periods of time.	The child will have needs that **require adjustments in one main area of learning**, information access and physical adjustments, or require only moderate adjustments throughout the day. The child will have programmes established by specialist practitioners' that need to be carried out by setting staff once or twice a week. The child will be able to independently access play activities or with low levels of support for at least 50% of the time.

Children who are already in an Early support place do not require additional funding as this place has been pre-commissioned. '*XXX will access support from his/her Early Support Place until XXX when he/she moves into Reception"*

Nursery schools, children's centres & Private, Voluntary and independent settings do not have a notional budget so are not expected to pay the first £6000.

Some children have a 30-hour entitlement in which case all funding will be doubled.

Funding must be recorded in hours as the entitlement is £570 hours per year which can equate to different hours per week depending on the setting.

Where children are delaying or deferring entry into Reception the same bandings apply

Appendix Two: Existing 0-19 Bandings and Top-ups (mainstream Schools)

Integrated Service for Special Educational Needs and Disabilities

Banding of Support Education Health and Care Plans in School Aged Children December 2015

An Education, Health or Care Plan may be issued for a child following a multi agency assessment. The EHC identifies that a child requires significant support and differentiation in order for the child to access the curriculum. The child's needs will be such that adjustments for access to the curriculum are required over and above the level that can be normally expected to be provided by a mainstream school. It is therefore over and above the £6,000 delegated for school in their 'notional SEN budget'. This resourcing is also described as the 'top up' funding provided to the mainstream schools through the High Needs Block budget, which is part of the dedicated schools grant.

The EHC will describe outcomes that should be achieved by the child, and the differentiation required to allow:

- **Access to the physical environment through adjustments to physical access and use of equipment**
- **Access to information through presentation of teaching materials in different formats e.g. through sign/Braille/use of Alternative and augmentative communication**
- **Access to learning through adjustments of teaching practice to take account of a child's cognitive difficulties or alternative learning styles**

The resourcing in the EHC plan should be used to achieve the access arrangements outlined in the plan and may be described in terms of adjustments to practice, provision of services with quantification, and additional financial resourcing. The additional financial resourcing may be typically used by schools for additional teaching time or additional special needs assistant time.

When resourcing is delegated for therapies a separate banding system is used (see banding of therapies and resourcing). The banding below describes the level of need demonstrated by the child, and the corresponding level of resourcing allocated within the child's Education Health and Care plan.

Band A	Band B	Band C	Band D	SMSA
£9,544.93 or 27.5 hours of support	**£8,131.75 or 25 hours of support**	**£5,305.40 or 20 hours of support**	**£2,479.05 or 15 hours of support**	**5 hours SMSA or £1,538.20**
The child **will have multiple complex** needs in all areas of learning, physical access and adjustment of information presented. The child will be unable to access the curriculum without adult support at any time and cannot be facilitated effectively by peer support. The school staff will need to carry out programmes of therapy and teaching in the absence of the specialist practitioners' on a daily basis, and which are updated at least half termly and often weekly by the practitioners' themselves. The child might otherwise be attending a special school or be attending a special school in the future.	The child **will have complex needs** that require adjustments in many areas of learning, information access and physical adjustments. The child will have programmes established by specialist practitioners' that need to be carried out by school staff several times a week. The child will be able to independently access learning, social engagement and activities that they engage in independently for very short periods of time, these activities may have been previously prepared or the child may choose them independently with some scaffolding e.g. use of choice boards, but continue to require some monitoring of these activities throughout the task.	The child will have **access needs that require adjustments** in several areas of learning, information access and physical adjustments. The child will have programmes established by specialist practitioners' that need to be carried out by school staff several times a week. The child will be able to independently access learning, social engagement and activities that they engage in for periods of time with low levels of support, or are able to engage in activities and exploration productively without adjustments being made throughout the activity. The choice of activity may require some scaffolding e.g. use of symbol time tables or choice boards.	The child will have needs that **require adjustments in one main area of learning**, information access and physical adjustments, or require only moderate adjustments throughout the day. The child will have programmes established by specialist practitioners' that need to be carried out by school staff once or twice a week. The child will be able to independently access learning, social engagement and activities that they engage in independently for at least 50% of the time. The child will require some support and adjustment to effectively engage in learning for specific activities or areas of the curriculum.	The child will **require a significant level of support in unstructured times t**hat ensure they are able to access leisure and personal care sufficient to meet their pastoral needs. Without this additional support the child may not be able to have a drink or something to eat, will not be able to play safely or negotiate around playground equipment, or attend to their personal care needs.

It is assumed that schools **will already** have additional support for children for this purpose in place, so any additional support would be over and above that expected for the child's developmental stage e.g. reception classes have additional support in place due to the normal variation in children's levels of independence at this age.

Please note that these levels of banding are indicative and subject to discussions with schools, dependent on the child's individual circumstances. These banding systems are also used for children who attend schools in other boroughs.

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Appendix Three: Bandings and Top Ups Consultation Report

Haringey Special Education Needs and Disabilities (SEND) Public Consultation

Revised Banding Descriptors for children and young people with an Education Health Care Plans (EHCP) in Haringey

5 October to 1 December 2023

Table of Contents

1. Overview
2. Co-production
3. Consultation documents
4. Marketing/communications
5. Events
6. Respondents’ data
7. Summary of consultation responses
8. Open text answers

1. Overview

1.1 Haringey Council SEND Service revised the language used to describe the needs of children with special education needs and disabilities (SEND). These descriptions, also known as 'Banding Descriptors,' apply to all pupils aged 0-19 with an Education Health Care Plan (EHCP) attending Haringey mainstream schools, academies, and special schools or those requiring SEND support within Early Years settings within Haringey.

1.2 The revised banding descriptors were coproduced with parents, carers, schools, health professionals, and psychologists over 12 months. To ensure they are accurate, practical, and equitable, we invited residents and professionals from local communities to review the updated descriptors and contribute to the consultation. The public consultation was the final step in gathering feedback and insight from the public to refine and finalise the banding descriptors for accuracy.

1.3 The public consultation lasted 8 weeks, from 5 October 2023 to 1 December 2023. Throughout the consultation, we organised online and in-person events across the borough to enable everyone to share their thoughts, ask questions and participate.

2. Co-production

2.1 This work has been coproduced at all stages with parents, carers, partners, and schools, with work first starting in September 2022. Refer to table one for a timeline of events.

Table One: Coproduction timeline of events

Co-production timeline			
Month	**Date**	**Description of meeting/event**	**Early years/Schools Banding and top-ups**
September 2022	12th September	Discussion with Bridge Renewal Trust and Parent Carer Forum (PCF)	Schools Banding and top-ups
	27th September	PCF	Schools Banding and top-ups
October 2022	5th October	PCF Follow up Q and A sent	Schools Banding and top-ups
	11th October	Pre-workshop discussion Bridge Renewal Trust and PCF	Schools Banding and top-ups
November 2022	15th November	SEND banding review workshop	Schools Banding and top-ups

	21st November	SEND banding review workshop (follow-up)	Schools Banding and top-ups
December 2022	6th December	• Parent Carers Forum 10.30 - 12.30 • Parent Carers Forum 18.30-20:00 • Parent Carers Forum Follow up Q and A would have been sent.	Schools Banding and top-ups
February 2023	3rd February	Special School Heads	Schools Banding and top-ups
	7th February	Parent Carers Forum Discussion	Schools Banding and top-ups
	22nd February	School SENCO Forum: Spring	Early Years Banding and top-ups
	24th February	Andrew Ralephata Discussion	Schools Banding and top-ups
March 2023	3rd March	Special Heads meeting	Early Years Banding and top-ups
	14th March	PCF discussion	Schools Banding and top-ups
	21st March	Parent Carers Forum	Schools Banding and top-ups
	23rd March	Riverside Visit and Discussion	Schools Banding and top-ups
	27th March	The Brook Visit and Discussion	Schools Banding and top-ups
	29th March	• PCF 10.30 - 12.30 • PCF 18:00-19:30	Schools Banding and top-ups
	31st March	Special School Heads Meeting	Schools Banding and top-ups
April 2023	19th April	The Vale Visit and Discussion	Schools Banding and top-ups
	19th April	West Green Visit and Discussion	Schools Banding and top-ups
	20th April	The Grove Visit and Discussion	Schools Banding and top-ups
	21st April	Haringey Education Partnership Discussion	Schools Banding and top-ups
May 2023	3rd May	Blanche Neville Visit and Discussion	Schools Banding and top-ups
	5th May	Special School Heads Meeting	Early Years Banding and top-ups

	5th May	Bandings Testing at Heartlands	Schools Banding and top-ups
	5th May	Haringey Learning Partnership Visit and Discussion	Schools Banding and top-ups
	10th May	Mulberry Visit and Discussion	Schools Banding and top-ups
	23rd May	Bandings Testing at The Vale	Early Years Banding and top-ups
June 2023	5th June	Bandings Testing at Campsbourne	Early Years Banding and top-ups
	6th June	Parent Carers Forum	Schools Banding and top-ups
	9th June	Special School Heads	Schools Banding and top-ups
	19th June	Bandings Testing at The Brook	Early Years Banding and top-ups
	21st June	Bandings Testing at Alexandra Primary	Early Years Banding and top-ups

3. Consultation documents

3.1 All consultation documents can be found below and on the 'Key consultation documents.' Printed copies were also available at all libraries across Haringey.

- Appendix One: Existing Early Years Bandings
- Appendix Two: Existing Bandings for 0-19 in Mainstream
- Appendix Three: Proposed Early Years Bandings
- Haringey Portage Checklist referenced in the for Early Years Proposed Banding document.
- Appendix Four: Proposed Bandings for children and young people aged 0-19

Accessibility

3.2 Guidance, tools and documents to help make the SEND consultation more accessible and easier to understand can be found on the 'accessibility' webpage.

- Digital Easy Read document
- Printed Easy Read document: copies available at all libraries across Haringey with a freepost envelope.
- Guidance on using an immersive reader
- Guidance on AbilityNet – free guidance on making devises easier to use
- Jargon Buster to help with phrases, abbreviations, acronyms, etc.

Translations

- Consultation documents translated in Spanish, Somali, Polish, Turkish, and Romanian can be found on the 'translations webpage'
- Guidance on using Google Translate on the 'accessibility' webpage.

4. Marketing and communications

4.1 Marketing of the consultation included:

Local Offer webpage	dedicated webpage which links directly to the consultation website: https://www.haringey.gov.uk/children-and-families/local-offer/about-local-offer/SEND-consultations/SEND-bandings-consultation
Frequently Asked Questions	https://haringeysendbandings.commonplace.is/en-GB/proposals/headline-faq-and-resources/step1
Consultation slides	PowerPoint presentation for all in-person and virtual events
Printed copies	printed copies of the consultation documents and survey were available at all libraries across Haringey. Copies of the translated documents were also available upon request.
Haringey People Extra	weekly newsletter sent to 50k+ residents 6 October and 27 October
Press release	October 10
Schools bulletin - bi-weekly newsletter	17 October 31 October 14 November 28 November
SEND Newsletter	11 October 8 November
Consultation-focused emails sent to newsletter list (4,000)	25 October and 28 November
Haringey.gov.uk	carousal ad displayed on council homepage throughout 8-week consultation period
Web banner	across all SEND webpages
Clear Channels	consultation ad with QR code displayed on all our digital advertising screens across Haringey borough
General email template	email template for the SEND service and our stakeholders to share widely
Communications kit for partners	Social media copy, templates, flyers, email templates, event copy, etc. Article in SEND Power, Parent Carer Forum member newsletter Email sent to the Markfield Project's mailing list
Internal communications	Member's briefing - newsletter to councillors sent 30 October Ad across all digital screens inside Council offices

4.2 Examples of templates, flyers, advertisements:







5. Events

5.1 Events held with stakeholders included:

Headteacher and SEND Co-ordinators trainings	• Format: 13 online training events between 19 September to 21 November 2023 • Total registrations: 191
Parent-focused events	• Format: 2 online events on 5 October 2023 and 11 October 2023 • Total registrations: 59
Public events	**Thursday, 19 October 11am to 12:30pm**

	• Format: online • Host: Markfield / SENDIASS • Registrations: 3 Attended: 1 **Monday, 23 October 7-8pm** • Format: online • Host: SEND Service • Registrations: 1 Attended: 0 **Wednesday, 25 October 6-7pm** • Format: online • Host: SEND Service • Registrations: 9 Attended: 7 **Tuesday, 21 November 1-2:30pm** • Format: in-person at Chestnuts Community Centre • Host: SEND Power, Parent Carer Forum • Registrations: 10 Attended: 3 **Thursday, 23 November 6:30-8pm - online** • Format: online • Host: SEND Power, Parent Carer Forum • Registrations: 20 Attended: 15 **Tuesday 28 November 1-2pm** • Format: In-person daytime event at Hornsey Library • Host: SEND Service • Registrations: 16 Attended: 6 **Tuesday 28 November 6-730pm. For School Governors only** • Format: In-person evening event at George Meehan House • Host: SEND Service • Registrations: 27 Attended: 12

6. Respondents Data

6.1 Data collected directly linked to the consultation pages are outlined as follows:

Consultation webpage: https://haringeysendbandings.commonplace.is/

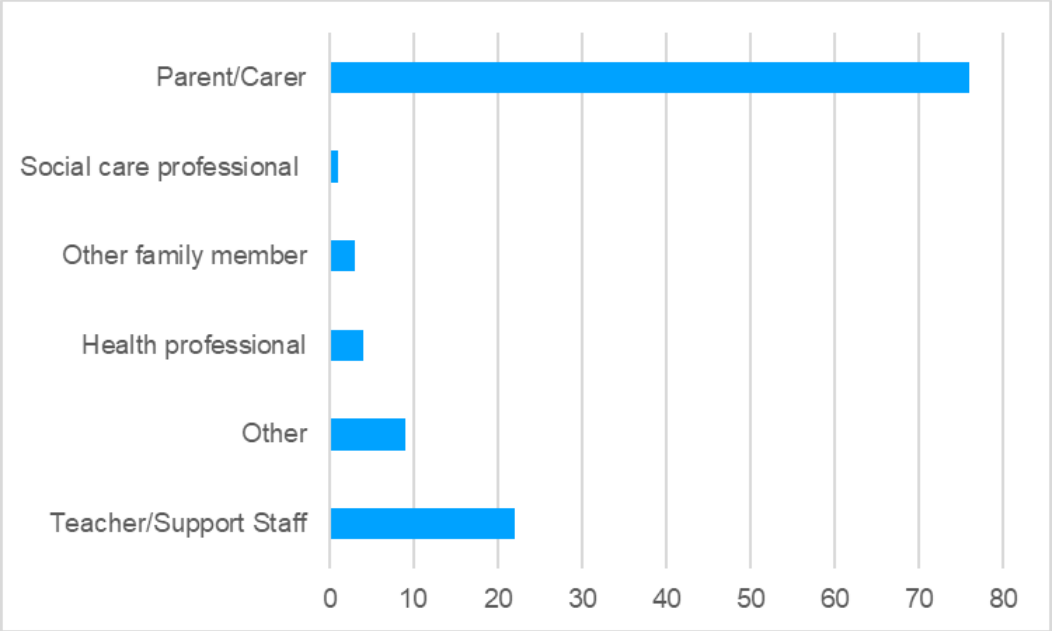
- 1,717 website visitors
- 81 respondents

Please note that the Commonplace platform allows respondents to skip questions, so not all 81 respondents completed every survey question.

- 117 contributions
- 141 news subscribers
- 72 public comments

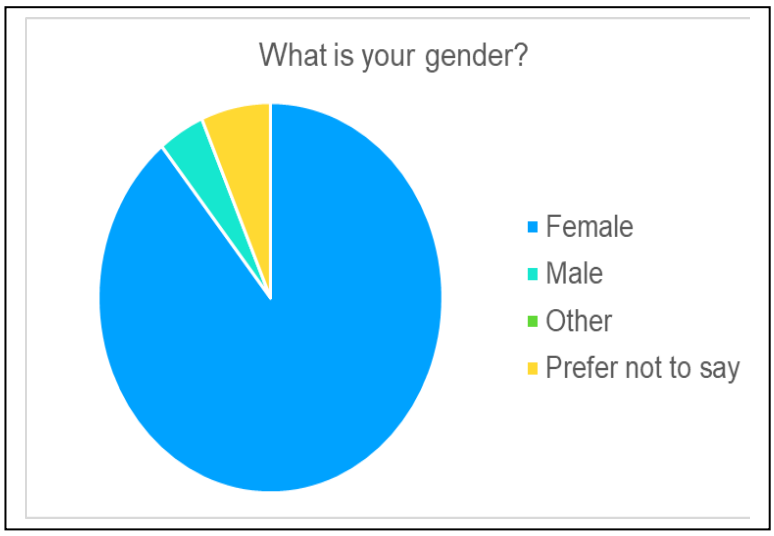
7. Respondents to the survey

- Parent/Carer: 76
- Teacher/Support Staff: 22
- Other: 9
- Health professional: 4
- Other family member: 3
- Social care professional: 1



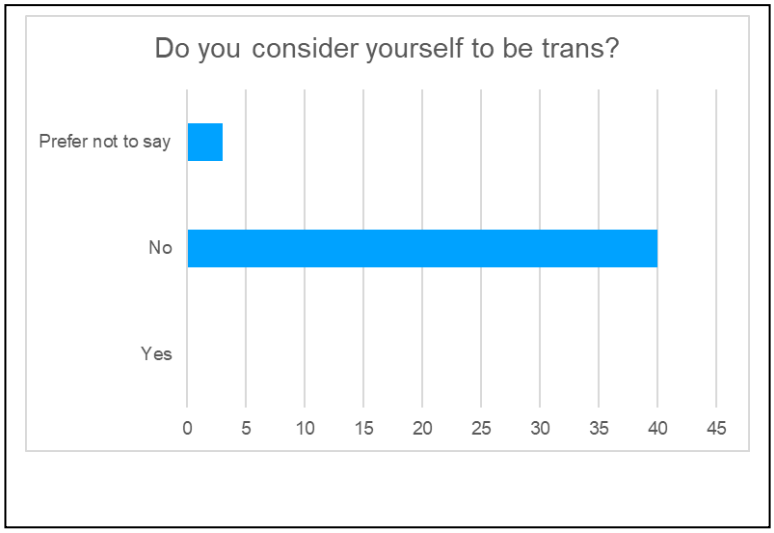
Gender

- Female: 41
- Male: 2
- Other: 0
- Prefer not to say: 3



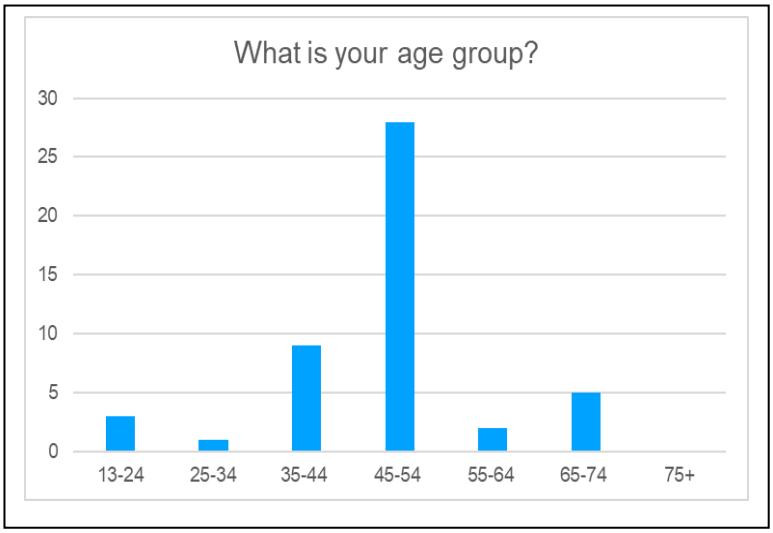
Do you consider yourself to be trans?

- Yes: 0
- No: 40
- Prefer not to say: 3



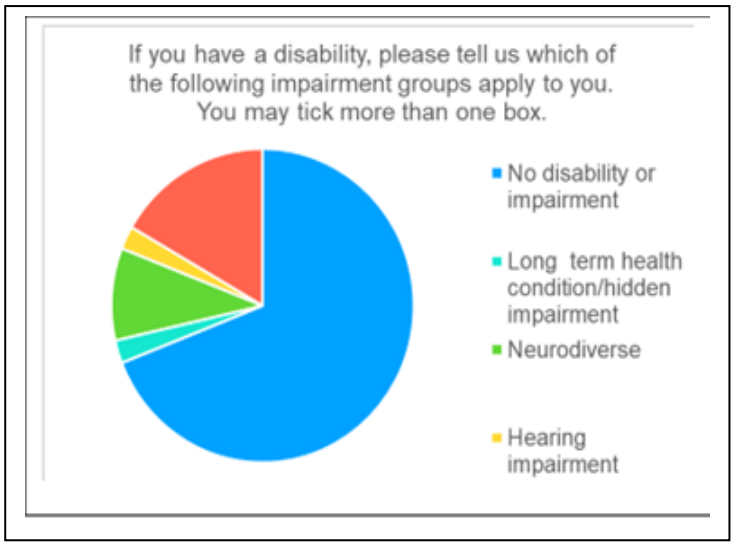
Age groups

- 13-24: 3
- 25-34: 1
- 35-44: 9
- 45-54: 28
- 55-64: 2
- 65-74: 5
- 75+: 0



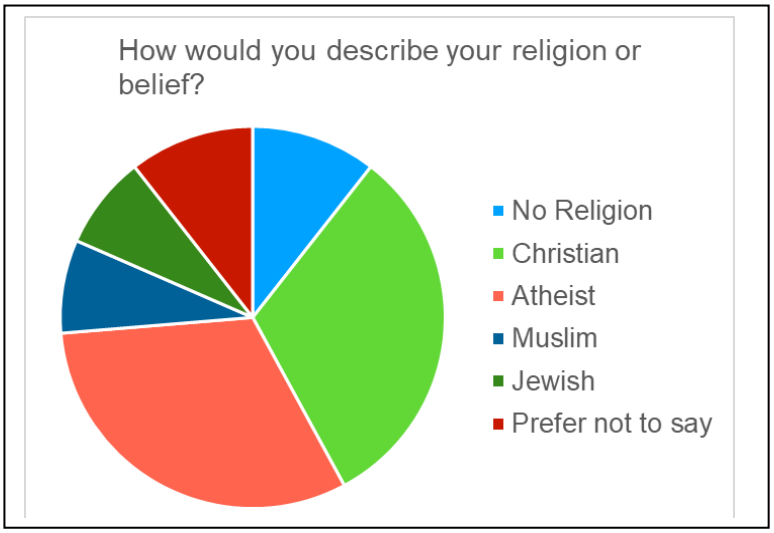
Disability

- No disability or impairment: 29
- Long term health condition /hidden impairment: 1
- Neurodiverse: 4
- Hearing impairment: 1
- Prefer not to say: 7



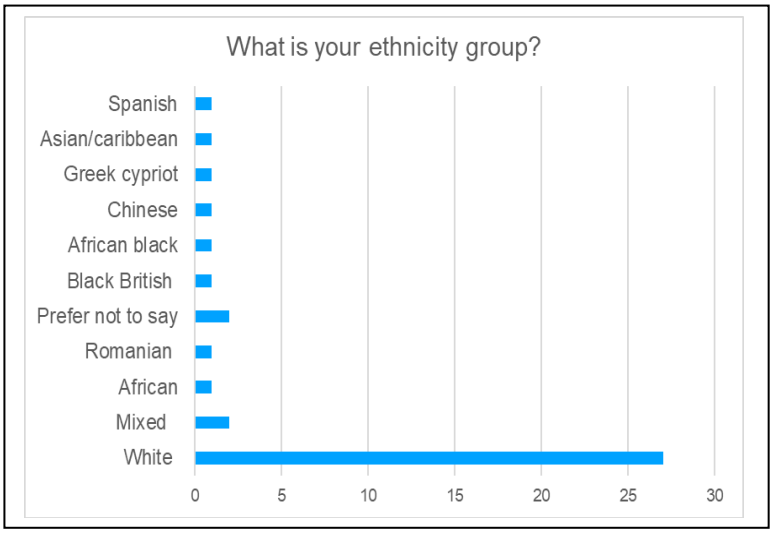
Religion:

- No Religion: 4
- Christian: 12
- Atheist: 12
- Muslim: 3
- Jewish: 3
- Prefer not to say: 4



Ethnicity

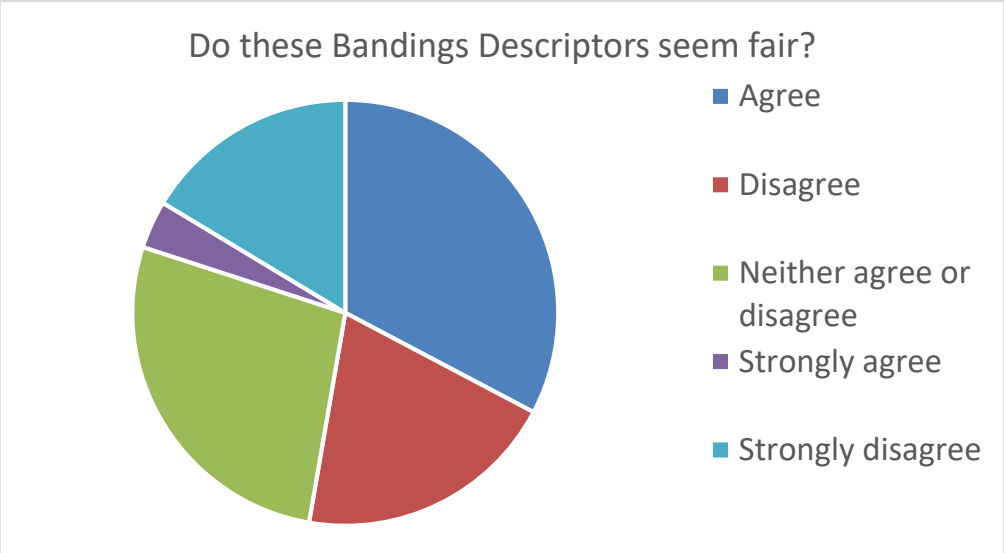
- White: 27
- Mixed: 2
- African: 1
- Romanian: 1
- Prefer not to say: 2
- Black British: 1
- African black: 1
- Chinese: 1
- Greek cypriot:1
- Asian/Caribbean: 1
- Spanish: 1



Survey questions

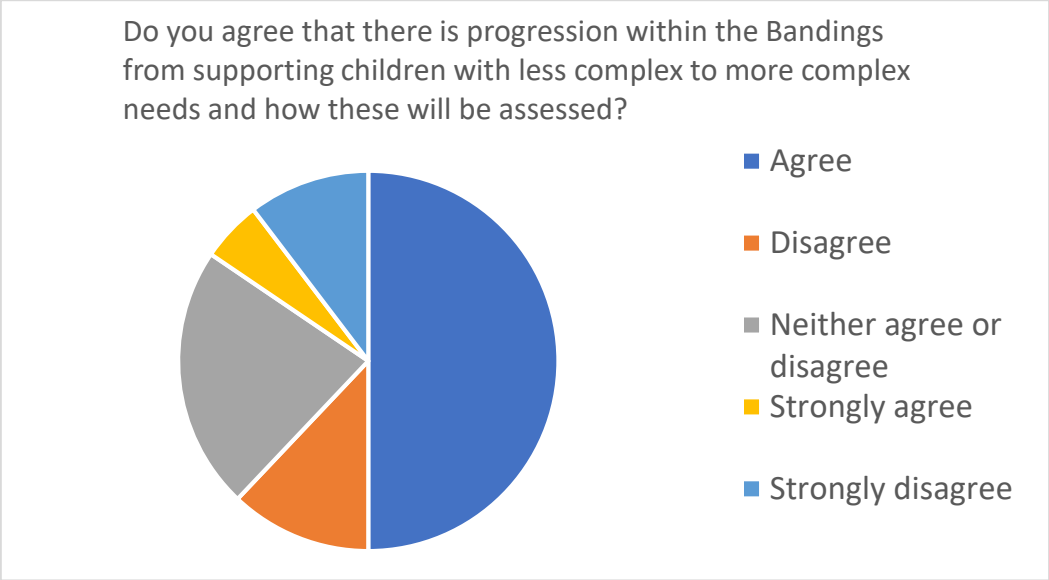
Question 1: Do these Bandings Descriptors seem fair?

- Agree: 18
- Disagree: 11
- Neither agree or disagree: 15
- Strongly agree: 2
- Strongly disagree: 9



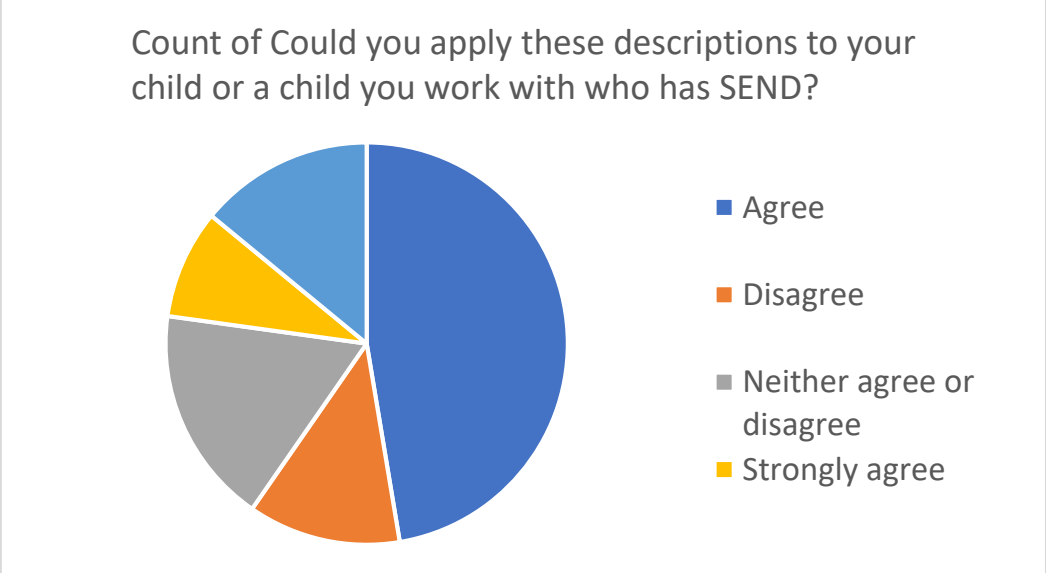
Question 2: Do you agree that there is progression within the Bandings from supporting children with less complex to more complex needs and how these will be assessed?

- Agree: 29
- Disagree: 7
- Neither agree or disagree: 13
- Strongly agree: 3
- Strongly disagree: 6



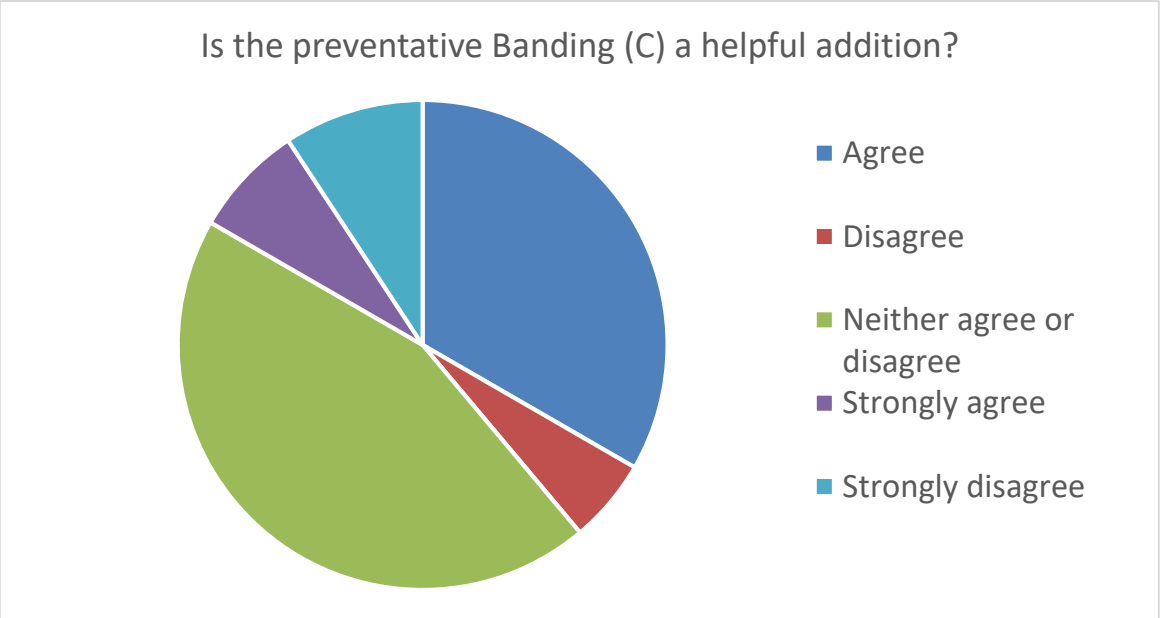
Question 3: Could you apply these descriptions to your child or a child you work with who has SEND?

- Agree: 27
- Disagree: 7
- Neither agree or disagree: 10
- Strongly agree: 5
- Strongly disagree: 8



Question 4: Is the preventative Banding (C) a helpful addition?

- Agree: 18
- Disagree: 3
- Neither agree or disagree: 24
- Strongly agree: 4
- Strongly disagree: 5



8. Free text responses

Question 5: Is there anything missing from the banding descriptors?

- 26 comments total

Acknowledgement of funding differences in special schools (e.g. missing the MSAG) that mean the viability of these bands is not actually comparable.
Although, a briefing meeting has been arranged for the end of November, governors have largely been ignored. We should have been involved at the beginning of the process! It is therefore very difficult to complete this questionnaire which is not accessible particularly as I am neurodivergent.
Behaviour descriptors; clear descriptors relating to severity of difficulties; a list to refer to when referring to several or many difficulties
Children that are diagnosed with very complex needs must receive all the support that they need
Clearer descriptors as how to distinguish between what is considered mainstream appropriate need and specialist need.

Early Years bandings are 1-4 numerical and primary banding are a-H alphabetical. How do they dovetail and how do children move from EY to primary? There is no indication of money or hours attached to the EY band descriptors. There are no reference to early support places in the band descriptors. It is unclear if any of these banding whether children are eligible for specialist provision. Unclear which provision children which will be able to access, mainstream or specialist provision. The EY bandings apply to children in 15-hour places or full day care in nurseries, childminders in homes and reception places in primary school the bandings take no account of the demands of these provisions and environments. There is no consistency and progression between EY and Primary banding, and this will only cause difficulties at transition points in children learning journeys.
Early years bandings are numerical and primary banding are alphabetical with no information on how the bandings dove tail. There is no indication of funding or hours attached to the early years banding descriptors. There is no reference to early support places on the early years banding descriptors. It is unclear which kind of provision children are going to be able to access e.g. specialist provision, highly supportive mainstream provision, etc. Early years banding apply to children in 15 hours nursery provision and reception. It takes no account of the different demands of those environments. We are concerns that the two banding descriptors will not support transition between EY and Year 1. There is no consistency and progression between the two documents.
Greater clarity/articulation of what the real difference is between Bands D, E and F (particularly D and E)
I could not find any band descriptors. Where are they
I think case studies of children with these new banding descriptions would help parent/careers and professionals place children in a more consistent way and help moderate the system with very little cost. Be mindful of language. One person's "severe" is not always the same as another individual's due to their lived experience do examples would be good here too.

I think that examples of behaviours/ traits that would fit into each of the bandings would be helpful. Maybe case studies of students with their banding profile to help parents/carers/professionals' ability to moderate across the scales. One person's "severe" is not always the same as someone else's perception of it due to their lived experiences.

I'd also like there to be a failsafe/trigger alert type of reconsideration/closer look when the parental/carers description of need is so much more than the schools and vice versa. Especially regarding attendance/social difficulties and behaviour outside of school. The "well they are fine in school" mantra has devastating implications for children and young people and can have a massive impact on getting children the support they need as soon as they need it. This in turn invariably means the support when it arrives is so much more complex/expensive than if the issues had been addressed with reasonable adjustments/knowledge and sometimes common sense earlier.

For example after lockdown my child had attendance/anxiety issues. We had the whole "they are fine when they are here" spiel for a year then after the year the first thing CAMHS asked the school was why haven't you applied for an EHCP for this child- they have the need. If the school were solely relied on I'm afraid many more children like mine will fall through the gaps. No one is working with children to do a bad job but a closer look at the correlation's between parent/carers and educational need descriptions would flag up the potential for early help needed asap rather that when the child falls into complete crisis like my own.

I think the descriptors are not nuanced enough. They do not include those children who mask within school but will still require support in order for them to truly cope and remain in school. It doesn't appear to address those children with significant sensory needs where the busy classroom is over stimulating or they are impacted on by smell, visuals, noise etc . It does not take into account those chosen who Struggle to sit still, focus and require support to stay on task or need differentiated work to cope even if their cognitive ability is average.

It does not take into afflict those children who struggle with pervasive demand avoidance. The descriptors of social issues are again too simplified. My autistic child is sociable and will initiate contact and wants fiends. But he still struggles with friendships, is very self-directed and doesn't get social nuances. My three descriptors his use is would on the face of it seem mild when they are actually hugely impairing. I worry this new banding system will mean children who need support will not get it. It looks like it's been designed to make it harder get an EHCP. Schools will just say the high-quality teaching is enough and my concern would be they would not provide the support required. I worry my child would fall into a lower category in this new system and he definitely requires support in school to enable him to learn. Without the EHCP there would be insufficient support.

It is really good to see so much detail in the banding descriptors. Missing from the banding descriptors - I cannot see anything in the banding descriptors about children who mask and faun at school. There appears in general to be an assumption that a child's anxiety or dysregulation or difficulty expressing emotions will be visible, and that anxiety leads to visibly distressed behaviour. Consider... 'Child may show anxiety' vs. 'Child may experience anxiety'. However anxiety can also lead to avoidance ie. a physical absence or a mental absence. A child may appear to the teachers to be fine and not dysregulated but the child is having difficulties which they make a big effort to conceal. My child is so far meeting her age related attainment levels because she is bright, but she is having great difficulty attending school and whilst at school is not able to learn to her best ability. In the banding descriptions school avoidance / attendance difficulties are mentioned in the Mental Health section, but should also be connected with neurodiversity and communication difficulties.
It's all very well banding children but you never actually implemented anything for my son. Took 10 years for CAMHS to diagnose with no support in between or access to services like therapy. His whole academic life has been ruined and he will probably find it very hard to find work. Schools don't put any strategies in place and resort to excluding.
Not that I can see.
Support needs for social communication and emotional regulation.
The banding and the reasons behind them are not clearly displayed on this forum , as a parent with a child with SEN this is abysmal, but then my experience with Haringey SEN team has been, from documents received with another child's name on them to having to go a tribunal to try and get an EHCP, which the council ignored, to having to pay for my child's diagnosis privately, paying for private support for them, and getting a physiologist from the council who told me that because I had paid privately for my child's diagnosis, that of course I was going to get a diagnosis. Changing the terminology of your banding does not fix the abysmal service I have received in the past.
The banding does not really matter. Haringey Council employed specialist fail to provide adequate assessment of needs and with Harigney schools unwilling l to spend their notional budget on the support - this is a tick box exercise which not going to improve anything for the Haringey children.
The functional abilities of CYP who may score severely on standard tests e.g for MLD/SLCN but are able to participate well even though they may be behind- especially as this affects a certain demography more than others
There is no point in having progressive banding descriptors for deaf children. Regardless of level of hearing they ALL require access to BSL / deaf peers / deaf role models and specialist teaching. The evidence is very clear that deaf people brought up in a mainstream school have twice the mental health problems of the general population - this can be eased by them attending a specialist school.
There is no reference to preventative banding C in the chart or info?
They need further detail so that specific nuances can be explained
Unfair that the children that actually do have send needs are judged the same as children that don't actually have send just more behaviour issues

What is missing in all banding is that you can't decide beforehand what the cost of the SEND provision will be and give it a cap amount pulled out of a hat. The cost will be determined by the need.
Yes please state in each banding of the child will require 1:1 adult support
Yes, an indication of resources. It's hard to compare with existing bandings when I don't know what these bands will entail in terms of funding compared to existing.

Question 6: Are there any other comments you want to make about the proposed changings to the banding descriptors?

- 33 comments total

Banding descriptors are fair and incremental and can be evidenced by school and setting interventions and impact. The eight levels may result in very little difference between consequent banding levels. It may be helpful to have two tables - One band A - C likely to be able to have their needs met by settings and schools and then other bands likely to need additional assessment, equipment, and funding. Bands A-C/D could be met by a SENDCo cluster through joint commissioning. May go some way to prevent ladder effect in bands.
Deafness needs to be taken independently of other needs. There are children with mild to moderate hearing loss who cannot cope in a mainstream setting. In addition to this the level of support goes up as the level of hearing goes down - despite intervention. A child with a cochlear implant will only have that because they have a profound loss - but with the CI in place they could access more sound than a child with a lower loss but hearing aids. I would be interested to know who you consulted with on this document about deafness because I do not know a single deaf adult that would agree with it.
Disagree with them all as children with send who need that extra support just won't get it.
How many children each year age 0-5 get an ECHP and therefore are entitled to the top up funding? Most children I work with struggle to get the assessments they need until they are well into primary school. You literally can classify these bands anyway you want but you are not addressing the underlying issues in the system. Children and families are being let down and schools are struggling to cope. There needs to be more SEND specialists and more special education facilities. I'm working with a 10 year old who has severe learning disabilities, hits, kicks, slaps, and disrupts her own class and at least 4 other classes every day and we cannot get a ECHP for her. I know you only want to know about your re-labelling, but I can't see how this improves life on the front line.
I could not find any band descriptors. Where are they
I have been getting used to the banding descriptors by referring to them whilst requesting/ reviewing EHCPs and they have been really helpful in pinning down need and provision and structuring my thinking about the range of needs in school.

I think this will support more accurate EHCP requests which provide the correct information to make a decision and match reasonable levels of support to meet need. A lot of hard work has gone into producing these bandings and it is appreciated.
I think greater thought could be put into the issues of autistic masking (especially in girls) and in old parlance “high functioning” autistic children. Masking and fawning cause burnout with devastating consequences including suicide. An acknowledgment that an autistic child may “seem” ok in school but they will still have needs and they should have those needs met. Taking away ta support/lego therapy/small group work or even a meet and greet at the start of the day for example, as they are “doing so well” can lead to a downturn in the child’s wellbeing and is counterproductive.
I think the bandings are a good idea but their use need needs to be evaluated and monitored.
I think these descriptors will particularly discriminate against Autistic children who are higher functioning in the sense of their IQ. It needs to consider those children where after school restraint collapse happens.
I would be grateful for an explanation of how this impacts the support my child receives. He has an EHCP in a mainstream school, year six.
If a child’s parent/carers deception of need is much greater than a schools it’d be helpful to have a failsafe in place so that more consideration can be given to that child. The “They are fine in school” mantra can lead to a child failing to get the support they need asap then invariably the need grows and the support becomes more complex/expensive to provide. If the lack of correlation between need at home/school is flagged up earlier support should be given swiftly and accurately. Importance should be placed on masking and fawning in autistic people. This is well known to cause burnout, anxiety and tragically suicide in individuals. Just because a child “seems” to be coping that might not be the case in fact. For example, that accommodation of a “meet and greet” by a ta at the start of the day shouldn’t be taken away as the child is “doing so well” without careful consideration taking into account the views of all parties. Sometimes the child’s needs might not be noticeable until a system changes - transition to a new school for example (this is well known especially amongst undiagnosed autistic girls). Just because a need is not overt doesn’t been it can be erased from a child’s records/passport/pupil profile because in times of stress that need may come forcefully to the fore.
If it means less money for schools, it is unfair and unworkable. Schools already have to fund the first £6000 of support, for a small single entry school with say 13 EHCPs this means there is nothing for preventative support, since high needs pupils mean there is no money for staff to do this
It must be very clear to parents especially WHY their child is allocated to the band they are, especially for those who are borderline cases... Please also somehow take into account, especially in deciding these borderline cases, that there is a lack of overall general funding available in mainstream schools who have a high number of SEN children demanding money from the school's budget, as this demand on the budget makes availability of everyday resources in the school

itself more limited which in turn has a major impact on the whole school provision, that also affects the child concerned...
It seems positive that education professionals will work with parents/ carers and the child to decide which band best fits the child's needs. In our case I feel that external professional expertise (eg. from an Educational Psychologist) will also be required in order to assess which band best fits our child's needs.
It should be a personalised description.
It's not clear to me how a child will be given an overall banding score if they are Band b in some areas, Band c in others and Band d in others. Are the different areas weighted or do they only need to meet the threshold in one area to qualify as that band?
No
Please add on each banding services available to child
Representing a special school, I am uncomfortable that the banding is geared to mainstream and so discounts the MSAG funding which is missing from the overall income within special schools. Should a separate piece of work be undertaken to consider the correct banding within non-mainstream settings?
The consultation has been marketed and constructed very badly. There had been a clear understanding that EY bandings were being consulted on separately not with primary. There was no much information and to many closed questions and little opportunity to unpick the information. In the recent training for headteacher there was no mention of the EY banding and it was not used and so this is wholly inappropriate as primary and nursery schools have EY provision from 2-5 years. There is too much information, and this will put EAL and vulnerable families at a disadvantage and therefore their voice will not be heard in the consultation.
The documents are very hard to compare, which makes me suspicious that this is on purpose, and that the goal is to reduce funding.
The reality is that you want to cut funding for the most vulnerable young people in the borough - this is unjust and will create further problems in their already challenging lives.
The use of the terms many, several etc. is too vague. This needs to be more specific as how many difficulties a child has and if a child would be described as having many or several difficulties and therefore fall into what banding comes into question.
There are no financial amounts next to each bank. How are schools and parents meant to know if there is enough money to fund the support in relation to each band.
There had been a clear understanding about the two bandings having been consulted separately. There is too much information and closed questions to be able to comment. There has been no mention of the EY banding at the primary headteachers meeting. This is wholly inappropriate because they have EY provision. There is a lot of information being asked to people to read and respond to. This will put vulnerable families at a disadvantage and their voice will not be heard.
Ultimately these descriptors would cut the funding and affect many schools.

Using academic delay as a diagnostic tool for need is likely to be self-defeating if the overall objective is reduction in spending. Some children will meet the criteria elsewhere for the various degrees of support but will still be hanging on academically. Or children in special schools will hopefully start to get back towards age-expected outcomes, but will only be doing so because of the appropriate, targeted support at special. What we don't want to do is set up this up so that children who meet the criteria for help in every other way need to fail to get support - getting those kids back on track will be more costly than interventions that stop them failing.
We are sending children with high SEND needs into mainstream schools. The school cannot cope and neither can the children.
What is missing is that you can't give a set amount of hours when the school day week is not 27 hours but 30 minimum without any extra time to keep paperwork and admin. Realistically minimum time should be 32.5 hours a week. The amounts that the SEND Team have come up with per week are not necessarily reflective of what the student will need. This does need to be reviewed. What is listed could be estimates but not fixed totals.
Whilst reviewing existing EHCPs and making a judgement on best fit bands, it has become obvious that the current plans do not contain sufficient information about needs. There is discrepancy between what is written in the plans and our knowledge of the children, therefore if we are looking at funding with the current plans in mind, it will definitely decrease but the child's needs are still high (hope this makes sense). Moving forward I think SENCos will be making sure that there is a lot more information in new EHCPs. Will the banding be looked at each annual review?
Why is all this money being spent on this rather than direct help for children in school. Communication poor no documentation of old to new mapping. THIS SHOULD NOT BE USED IN ANYWAY TO REMOVE OR REDUCE FUNDING FROM CHILDREN. Please focus on giving support to children and schools. The basic band descriptions were clear but not the additional matrix was not clear how this would link to the summarised one e.g. if you have child with no learning difficulties but needs constant support to achieve those so isn't high needs in cognitive and learning but is in the areas. What was the point of this matrix in the documentation it feels like this is trying to change the EHCPs interpretations and funding.

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Appendix Four: Summary of Top Ups and Bandings consultation feedback and responses

Question 5: Is there anything missing from the banding descriptors?				
Comment	Covered in Bandings document	If Yes, Section	Action required	Response
Acknowledgement of funding differences in special schools (e.g. missing the MSAG) that mean the viability of these bands is not actually comparable.	No	Not applicable	None	The Bandings descriptors are not funding documents. Any allocation of funding will be in accordance with national funding formulas
Although, a briefing meeting has been arranged for the end of November, governors have largely been ignored. We should have been involved at the beginning of the process! It is therefore very difficult to complete this questionnaire which is not accessible particularly as I am neurodivergent.	No	Not applicable	None	Feeback noted, there has been governor involvement in the consultation process with a separate consultation session for governors held on 28th November for 2 hours at George Meehan House.
Behaviour descriptors; clear descriptors relating to severity of difficulties; a list to refer to when referring to several or many difficulties	Yes	Throughout document	Review of descriptors.	The descriptors were reviewed for each section and signed off by the lead teacher for each area.
Children that are diagnosed with very complex needs must receive all the support that they need	No	Not applicable	None	Thank you, this has been noted.
Clearer descriptors as how to distinguish between what is considered mainstream appropriate need and specialist need.	No	Not applicable	None	The Bandings descriptors are intended to be indicators of need not of provision. The testing of Bandings suggested that there were a number of children with complex needs who were being educated in mainstream school as this was parental preference and the resourcing needs to be available to support these children.
Early Years bandings are 1-4 numerical and primary banding are a-H alphabetical. How do they dovetail and how do children move from EY to primary? There is no indication of money or hours attached to the EY band descriptors. There are no reference to early support places in the band descriptors. It is unclear if any of these banding whether children are eligible for specialist provision. Unclear which provision children which will be able to access, mainstream or specialist provision. The EY bandings apply to children in 15-hour places or full day care in nurseries, childminders in homes and reception places in primary school the bandings take no account of the demands of these provisions and environments. There is no consistency and progression between EY and Primary banding, and this will only cause difficulties at transition points in children learning journeys.	No	See Response	None	The Bandings descriptors are intended to be indicators of need and are differentiated between Early Years needs and the needs of older, school age children as there are different child development milestones used to indicate children's needs. The Bandings are indicated by different letters/ numbers to ensure this differentiation is maintained and there is no overlap. It is recognised that children's needs may look different dependent on provision made in early years (for example a child with SEND may present with less complexity of need in a smaller group child minder setting than in a busy day nursery), each child will need to be assessed carefully based on current needs). The consultation was to ensure that the language used to describe children's needs is fair and well-formulated as these will form the basis of funding allocations, however children's needs should not be defined by their provision requirements but rather by a clear, concise and objective description of the area of need for which provision should be made. It is recognised in law that the decision as to where a child is suitably placed is informed by parental choice; therefore Bandings need to ensure that resource is equitably distributed according to the complexity of the needs of the child not by the provision which the child attends.
Early years bandings are numerical and primary banding are alphabetical with no information on how the bandings dove tail. There is no indication of funding or hours attached to the early years banding descriptors. There is no reference to early support places on the early years banding descriptors. It is unclear which kind of provision children are going to be able to access e.g. specialist provision, highly supportive mainstream provision, etc. Early years banding apply to children in 15 hours nursery provision and reception. It takes no account of the different demands of those environments. We are concerns that the two banding descriptors will not support transition between EY and Year 1. There is no consistency and progression between the two documents.	No	See response	None	As above (repetition)
Greater clarity/articulation of what the real difference is between Bands D, E and F (particularly D and E)	Yes	Bandings D, E, F – Cognition and Learning.	completed	Thank you, this has been noted and amended. Please see amended wording to Cognition and Learning bandings D, E and F

I could not find any band descriptors. Where are they	No	None	No	The descriptors are on our local offer website with the consultation documents.
I think case studies of children with these new banding descriptions would help parent/careers and professionals place children in a more consistent way and help moderate the system with very little cost. Be mindful of language. One person's "severe" is not always the same as another individual's due to their lived experience do examples would be good here too.	No	N/A	Yes	The descriptors do provide definitions with evidence of mild/ moderate/ severe needs across a continuum. However, the observation about case studies is useful and will be incorporated into the operational guidance which will accompany the bandings.
I think that examples of behaviours/ traits that would fit into each of the bandings would be helpful. Maybe case studies of students with their banding profile to help parents/carers/professionals' ability to moderate across the scales. One person's "severe" is not always the same as someone else's perception of it due to their lived experiences. I'd also like there to be a failsafe/trigger alert type of reconsideration/closer look when the parental/carers description of need is so much more than the schools and vice versa. Especially regarding attendance/social difficulties and behaviour outside of school. The "well they are fine in school" mantra has devastating implications for children and young people and can have a massive impact on getting children the support they need as soon as they need it. This in turn invariably means the support when it arrives is so much more complex/expensive than if the issues had been addressed with reasonable adjustments/knowledge and sometimes common sense earlier. For example after lockdown my child had attendance/anxiety issues. We had the whole "they are fine when they are here" spiel for a year then after the year the first thing CAMHS asked the school was why haven't you applied for an EHCP for this child- they have the need. If the school were solely relied on I'm afraid many more children like mine will fall through the gaps. No one is working with children to do a bad job but a closer look at the correlation's between parent/carers and educational need descriptions would flag up the potential for early help needed asap rather that when the child falls into complete crisis like my own.	Yes	See page 1 of document	Yes	It is noted that the documentation is lengthy would be supported by Case Studies which will be included in the operational guidance. Page one now has a reference to consideration of 'masking' in relation, in particular to assessing social communication needs.
I think the descriptors are not nuanced enough. They do not include those children who mask within school but will still require support in order for them to truly cope and remain in school. It doesn't appear to address those children with significant sensory needs where the busy classroom is over stimulating or they are impacted on by smell, visuals, noise etc . It does not take into account those chosen who Struggle to sit still, focus and require support to stay on task or need differentiated work to cope even if their cognitive ability is average.	Yes	See page 1 of the document.	Yes	See page 1 of document which now has a reference to consideration of 'masking' in relation, in particular to assessing social communication needs.
It does not take into afflict those children who struggle with pervasive demand avoidance. The descriptors of social issues are again too simplified. My autistic child is sociable and will initiate contact and wants fiends. But he still struggles with friendships, is very self-directed and doesn't get social nuances. My three descriptors his use is would on the face of it seem mild when they are actually hugely impairing. I worry this new banding system will mean children who need support will not get it. It looks like it's been designed to make it harder get an EHCP. Schools will just say the high-quality teaching is enough and my concern would be they would not provide the support required. I worry my child would fall into a lower category in this new system and he definitely requires support in school to enable him to learn. Without the EHCP there would be insufficient support.	Yes	See page 1 of document	Yes	See page 1 of document which now has a reference to consideration of 'masking' in relation, in particular to assessing social communication needs.
It is really good to see so much detail in the banding descriptors. Missing from the banding descriptors - I cannot see anything in the banding descriptors about children who mask and faun at school. There appears in general to be an assumption that a child's anxiety or dysregulation or difficulty expressing emotions will be visible, and that anxiety leads to visibly distressed behaviour. Consider... 'Child may show anxiety' vs. 'Child may experience anxiety'. However anxiety can also lead to avoidance ie. a physical absence or a mental absence. A child may appear to the teachers to be fine and not dysregulated but the child is having difficulties which they make a big effort to conceal. My child is so far meeting her age related attainment levels because she is bright, but she is having great difficulty attending school and whilst at school is not able to learn to her best ability. In the banding descriptions school avoidance / attendance difficulties are mentioned in the Mental Health section, but should also be connected with neurodiversity and communication difficulties.	Yes	See page 1 of document	Yes	It is recognised that children may have needs in a number of areas. Banding will be allocated according to the area of highest need as extensive testing has indicated that this gives the best outcome for children. See page 1 of document which now has a reference to consideration of 'masking' in relation, in particular to assessing social communication needs.
It's all very well banding children but you never actually implemented anything for my son. Took 10 years for CAMHS to diagnose with no support in between or access to services like therapy. His whole academic life has been ruined and he will probably find it very hard to find work. Schools don't put any strategies in place and resort to excluding.	No	None	N/A	Thank you for your feedback, this has been noted.
Not that I can see.	No	None	N/A	Thank you for your feedback, this has been noted.
The banding and the reasons behind them are not clearly displayed on this forum , as a parent with a child with SEN th is abysmal, but then my experience with Haringey SEN team has been, from documents	No	None	N/A	Thank you for your feedback, this has been noted.

received with another child's name on them to having to go a tribunal to try and get an EHCP, which the council ignored, to having to pay for my child's diagnosis privately, paying for private support for them, and getting a physiologist from the council who told me that because I had paid privately for my child's diagnosis, that of course I was going to get a diagnosis. Changing the terminology of your banding does not fix the abysmal service I have received in the past.				
The banding does not really matter. Haringey Council employed specialist fail to provide adequate assessment of needs and with Harigney schools unwilling l to spend their notional budget on the support - this is a tick box exercise which not going to improve anything for the Haringey children.	No	None	N/A	Thank you for your feedback, this has been noted.
The functional abilities of CYP who may score severely on standard tests e.g for MLD/SLCN but are able to participate well even though they may be behind-especially as this affects a certain demography more than others	No	None	No	Thank you for your feedback, this has been noted.
There is no point in having progressive banding descriptors for deaf children. Regardless of level of hearing they ALL require access to BSL / deaf peers / deaf role models and specialist teaching. The evidence is very clear that deaf people brought up in a mainstream school have twice the mental health problems of the general population - this can be eased by them attending a specialist school.	Yes	Please see amends to section in relation to Sensory Needs (Deafness)	Yes	The law recognises that all children have a right to mainstream education, and that the decision to place a child in special school is made by parents on the advice of practitioners. Whilst many parents choose specialist provision for their deaf child, this is not a universal choice and this Bandings structure is designed to ensure that children are allocated the same resource regardless of where their parents choose to educate them. Please see amends to section in relation to Sensory Needs (Deafness
There is no reference to preventative banding C in the chart or info?	No	None	N/A	Band C is described throughout the Bandings documents.
They need further detail so that specific nuances can be explained	No	None	Yes	The banding descriptors are already lengthy documents, however its is noted that Case studies would support implementation and will be included in the operational guidance.
Unfair that the children that actually do have send needs are judged the same as children that don't actually have send just more behaviour issues	No	None	No	It is recognised that many behavioural issues in children are due to unmet SEND needs and the Bandings are designed to recognise the range and extent of these.
What is missing in all banding is that you can't decide beforehand what the cost of the SEND provision will be and give it a cap amount pulled out of a hat. The cost will be determined by the need.	No	None	No	The Local Authority will use the Bandings document to ensure that the resources allocated to the Local Authority to meet the needs of children with SEND are distributed according to fair criteria.
Yes please state in each banding of the child will require 1:1 adult support	No	None	No	Evidence of good practice in SEND suggests that many children with or without SEND will require intervals of individual support throughout the day for varying lengths of time according to their needs.
Yes, an indication of resources. It's hard to compare with existing bandings when I don't know what these bands will entail in terms of funding compared to existing.	No	None	No	The purpose of the Bandings is to define needs fairly, i.e. that the Local Authority should allocate resources according to identified needs, rather than according to where parents choose to send their children to schools. Any discussion about resourcing will detract for evaluation via consultation of the definitions within this document.

Question 6: Are there any other comments you want to make about the proposed changings to the banding descriptors?				
Comment	Covered in bandings	If Yes, where?	Action required	Service response
Banding descriptors are fair and incremental and can be evidenced by school and setting interventions and impact. The eight levels may result in very little difference between consequent banding levels. It may be helpful to have two tables - One band A - C likely to be able to have their needs met by settings and schools and then other bands likely to need additional assessment, equipment, and funding. Bands A-C/D could be met by a SENDCo cluster through joint commissioning. May go some way to prevent ladder effect in bands.	No	None	No	The Bandings are incremental, they are not designed to indicate provision, only to define the extent of children's needs. Provision for children will vary according to parental preference and school/ setting design, the resources allocated should be the same regardless of school/ setting.
Deafness needs to be taken independently of other needs. There are children with mild to moderate hearing loss who cannot cope in a mainstream setting. In addition to this the level of support goes up as the level of hearing goes down - despite intervention. A child with a cochlear implant will only have that because they have a profound loss - but with the CI in place they could access more sound than a child with a lower loss but hearing aids. I would be interested to know who you consulted with on this document about deafness because I do not know a single deaf adult that would agree with it.	No	Yes, see Guidance notes and revision to wording in the Sensory Needs (deafness) section	Yes	This has been amended, see Guidance notes and revision to wording in the Sensory Needs (deafness) section.
Disagree with them all as children with send who need that extra support just won't get it.	No	No	N/A	Thank you for your feedback, this has been noted.
How many children each year age 0-5 get an ECHP and therefore are entitled to the top up funding? Most children I work with struggle to get the assessments they need until they are well into primary school. You literally can classify these bands anyway you want but you are not addressing the underlying issues in the system.	No	No	N/A	The intention of creating section C and having separate Banding for Early Years is to promote early intervention and support for younger children so that they do not need an EHCP in order to access top-up funding. The Bandings work is one part of the Haringey SEND transformation programme. For further information see: https://www.haringey.gov.uk/children-and-families/local-offer

Children and families are being let down and schools are struggling to cope. There needs to be more SEND specialists and more special education facilities. I'm working with a 10 year old who has severe learning disabilities, hits, kicks, slaps, and disrupts her own class and at least 4 other classes every day and we cannot get a ECHP for her. I know you only want to know about your re-labelling, but I can't see how this improves life on the front line.				
I could not find any band descriptors. Where are they	No	No	N/A	The descriptors are on our local offer website with the consultation documents.
I have been getting used to the banding descriptors by referring to them whilst requesting/ reviewing EHCPs and they have been really helpful in pinning down need and provision and structuring my thinking about the range of needs in school. I think this will support more accurate EHCP requests which provide the correct information to make a decision and match reasonable levels of support to meet need. A lot of hard work has gone into producing these bandings and it is appreciated.	No	No	N/A	Thank you for your feedback, this has been noted.
I think greater thought could be put into the issues of autistic masking (especially in girls) and in old parlance "high functioning" autistic children. Masking and fawning cause burnout with devastating consequences including suicide. An acknowledgment that an autistic child may "seem" ok in school but they will still have needs and they should have those needs met. Taking away ta support/lego therapy/small group work or even a meet and greet at the start of the day for example, as they are "doing so well" can lead to a downturn in the child's wellbeing and is counterproductive.	Yes	See page 1 of document	Yes	See page 1 of document which now has a reference to consideration of 'masking' in relation, in particular to assessing social communication needs.
I think the bandings are a good idea but their use need needs to be evaluated and monitored.	No	No	N/A	Thank you for your feedback, this has been noted.
I think these descriptors will particularly discriminate against Autistic children who are higher functioning in the sense of their IQ. It needs to consider those children where after school restraint collapse happens.	Yes	See page 1 of document.	Yes	See page 1 of document which now has a reference to consideration of 'masking' in relation, in particular to assessing social communication needs.
I would be grateful for an explanation of how this impacts the support my child receives. He has an EHCP in a mainstream school, year six.	No	No	N/A	Any changes to the support which your child is offered in school must be discussed at his Annual Review in accordance with Children and Families Act 2014 and 2015 SEND Code of Practice.
If a child's parent/carers deception of need is much greater than a schools it'd be helpful to have a failsafe in place so that more consideration can be given to that child. The "They are fine in school" mantra can lead to a child failing to get the support they need asap then invariably the need grows and the support becomes more complex/expensive to provide. If the lack of correlation between need at home/school is flagged up earlier support should be given swiftly and accurately. Importance should be placed on masking and fawning in autistic people. This is well known to cause burnout, anxiety and tragically suicide in individuals. Just because a child "seems" to be coping that might not be the case in fact. For example, that accommodation of a "meet and greet" by a ta at the start of the day shouldn't be taken away as the child is "doing so well" without careful consideration taking into account the views of all parties. Sometimes the child's needs might not be noticeable until a system changes - transition to a new school for example (this is well known especially amongst undiagnosed autistic girls). Just because a need is not overt doesn't been it can be erased from a child's records/passport/pupil profile because in times of stress that need may come forcefully to the fore.	Yes	See page 1 of document.	Yes	See page 1 of document which now has a reference to consideration of 'masking' in relation, in particular to assessing social communication needs.
If it means less money for schools, it is unfair and unworkable. Schools already have to fund the first £6000 of support, for a small single entry school with say 13 EHCPs this means there is nothing for preventative support, since high needs pupils mean there is no money for staff to do this	No	None	N/A	The Bandings are intended to allocate resources fairly according to the needs of children.
It must be very clear to parents especially WHY their child is allocated to the band they are, especially for those who are borderline cases... Please also somehow take into account, especially in deciding these borderline cases, that there is a lack of overall general funding available in mainstream schools who have a high number of SEN children demanding money from the school's budget, as this demand on the budget makes availability of everyday resources in the school itself more limited which in turn has a major impact on the whole school provision, that also affects the child concerned...	No	None	Yes	Operational guidance including Case studies will be issued to schools to support the implementation of the Bandings.
It seems positive that education professionals will work with parents/ carers and the child to decide which band best fits the child's needs. In our case I feel that external professional expertise (eg. from an Educational Psychologist) will also be required in order to assess which band best fits our child's needs.	No	None	Yes	Every school in Haringey has an allocated Education Psychologist who will work with schools to discuss and advise regarding the needs of children.
It should be a personalised description.	No	None	N/A	The intention of the Bandings documents is to categorise needs so that resources can be allocated fairly. The support for children allocated via the Bandings should always be personalised within an EHCP or SEND support plan.
It's not clear to me how a child will be given an overall banding score if they are Band b in some areas, Band c in others and Band d in others. Are the different areas weighted or do they only need to meet the threshold in one area to qualify as that band?	No	None	N/A	It is recognised that children may have needs in a number of areas. Banding will be allocated according to the area of highest need as extensive testing has indicated that this gives the best outcome for children
No	No	None	N/A	

Please add on each banding services available to child	No	None	N/A	The purpose of the Bandings is to define needs fairly, i.e. that the Local Authority should allocate resources according to identified needs, rather than according to where parents choose to send their children to schools. Any discussion about resourcing will detract for evaluation via consultation of the definitions within this document
Representing a special school, I am uncomfortable that the banding is geared to mainstream and so discounts the MSAG funding which is missing from the overall income within special schools. Should a separate piece of work be undertaken to consider the correct banding within non-mainstream settings?	No	None	N/A	The financial work underpinning the resource allocations to Bandings will be overseen by the Schools Forum and made in accordance with the schools funding formula.
The banding and the reasons behind them are not clearly displayed on this forum, as a parent with a child with SEN th is abysmal, but then my experience with Haringey SEN team has been, from documents received with another child's name on them to having to go a tribunal to try and get an EHCP, which the council ignored, to having to pay for my child's diagnosis privately, paying for private support for them, and getting a physiologist from the council who told me that because I had paid privately for my child's diagnosis, that of course I was going to get a diagnosis. Changing the terminology of your banding does not fix the abysmal service I have received in the past.	No	None	N/A	Thank you for your feedback, this has been noted.
The banding does not really matter. Haringey Council employed specialist fail to provide adequate assessment of needs and with Harigney schools unwilling l to spend their notional budget on the support - this is a tick box exercise which not going to improve anything for the Haringey children.	No	None	N/A	Thank you for your feedback, this has been noted.
The consultation has been marketed and constructed very badly. There had been a clear understanding that EY bandings were being consulted on separately not with primary. There was no much information and to many closed questions and little opportunity to unpick the information. In the recent training for headteacher there was no mention of the EY banding and it was not used and so this is wholly inappropriate as primary and nursery schools have EY provision from 2-5 years. There is too much information, and this will put EAL and vulnerable families at a disadvantage and therefore their voice will not be heard in the consultation.	No	None	Yes	The Early years Bandings work has been supported by a group of key stakeholders. They will have separate operational guidance which will be shared with schools prior to implementation.
The documents are very hard to compare, which makes me suspicious that this is on purpose, and that the goal is to reduce funding.	No	None	N/A	It is noted that the documents are lengthy. The intention of the new Bandings Framework is to ensure the fair distribution of resources according to the needs of children.
The reality is that you want to cut funding for the most vulnerable young people in the borough - this is unjust and will create further problems in their already challenging lives.	No	None	N/A	The intention of the new Bandings Framework is to ensure the fair distribution of resources according to the needs of children.
The use of the terms many, several etc. is too vague. This needs to be more specific as how many difficulties a child has and if a child would be described as having many or several difficulties and therefore fall into what banding comes into question.	No	None	Yes	The banding descriptors are already lengthy documents, however its is noted that Case studies would support implementation and will be included in the operational guidance.
There are no financial amounts next to each bank. How are schools and parents meant to know if there is enough money to fund the support in relation to each band.	No	None	N/A	The intention of the new Bandings Framework is to ensure the fair distribution of resources according to the needs of children
There had been a clear understanding about the two bandings having been consulted separately. There is too much information and closed questions to be able to comment. There has been no mention of the EY banding at the primary headteachers meeting. This is wholly inappropriate because they have EY provision. There is a lot of information being asked to people to read and respond to. This will put vulnerable families at a disadvantage and their voice will not be heard.	No	None	N/A	It is noted that the documents are lengthy. The intention of the new Bandings Framework is to ensure the fair distribution of resources according to the needs of children.
Ultimately these descriptors would cut the funding and affect many schools.	No	None	N/A	It is noted that the documents are lengthy. The intention of the new Bandings Framework is to ensure the fair distribution of resources according to the needs of children.
Using academic delay as a diagnostic tool for need is likely to be self-defeating if the overall objective is reduction in spending. Some children will meet the criteria elsewhere for the various degrees of support but will still be hanging on academically. Or children in special schools will hopefully start to get back towards age-expected outcomes, but will only be doing so because of the appropriate, targeted support at special. What we don't want to do is set up this up so that children who meet the criteria for help in every other way need to fail to get support - getting those kids back on track will be more costly than interventions that stop them failing.	No	None	N/A	It is recognised that children may have needs in a number of areas. Banding will be allocated according to the area of highest need as extensive testing has indicated that this gives the best outcome for children
We are sending children with high SEND needs into mainstream schools. The school cannot cope and neither can the children.	No	None	N/A	The purpose of the Bandings is to define needs fairly, i.e. that the Local Authority should allocate resources according to identified needs, rather than according to where parents choose to send their children to schools. Any discussion about resourcing will detract for evaluation via consultation of the definitions within this document
What is missing is that you can't give a set amount of hours when the school day week is not 27 hours but 30 minimum without any extra time to keep paperwork and admin. Realistically minimum time should be 32.5 hours a week.	No	None	N/A	The new bandings framework does not include an allocation of hours of support. This is the existing bandings framework and we are proposing to change this.

The amounts that the SEND Team have come up with per week are not necessarily reflective of what the student will need. This does need to be reviewed. What is listed could be estimates but not fixed totals.				
Whilst reviewing existing EHCPs and making a judgement on best fit bands, it has become obvious that the current plans do not contain sufficient information about needs. There is discrepancy between what is written in the plans and our knowledge of the children, therefore if we are looking at funding with the current plans in mind, it will definitely decrease but the child's needs are still high (hope this makes sense). Moving forward I think SENCos will be making sure that there is a lot more information in new EHCPs. Will the banding be looked at each annual review?	No	None	Yes	Banding allocation should be considered at every Annual review based on the child's current needs.
Why is all this money being spent on this rather than direct help for children in school. Communication poor no documentation of old to new mapping. THIS SHOULD NOT BE USED IN ANYWAY TO REMOVE OR REDUCE FUNDING FROM CHILDREN. Please focus on giving support to children and schools. The basic band descriptions were clear but not the additional matrix was not clear how this would link to the summarised one e.g. if you have child with no learning difficulties but needs constant support to achieve those so isn't high needs in cognitive and learning but is in the areas. What was the point of this matrix in the documentation it feels like this is trying to change the EHCPs interpretations and funding.	No	None	N/A	The intention of the Bandings documents is to categorise needs so that resources can be allocated fairly. The support for children allocated via the Bandings should always be personalised within an EHCP or SEND support plan.

Appendix Five: Haringey Early Years Inclusion Banding Descriptors

(Changes as a result of consultation are in red)

Introduction

Haringey Local Authority and its partners are committed to strengthening the systems of support for all young people with SEND. Haringey recognises that SEND is a broad term which includes the vast range of special educational needs and disabilities many of our young people manage, sometimes living with these permanently, and other times for a shorter period.

To ensure resources are used efficiently, it is essential to ensure that systems for allocating additional resources (beyond those expected in our inclusive Early Years Settings) are transparent, fair and based on need.

As a step towards addressing this, a set of banding descriptors has been developed over the course of 2022/23 working across our partnerships to provide a guide to levels of developmental differences and SEN needs, so that there is greater transparency and understanding of how needs are identified, and the provision made to meet those needs.

The banding descriptors are designed to align with Haringey's graduated response to children and young people with SEND and with the guidance for when to seek an EHC assessment.

The banding descriptors were developed throughout 2023. They have been developed by a working party of SENCOs, therapists and other educational professionals, parents and carers and local authority SEND officers. The Bandings were open to public consultation in Autumn 2023 and as a result further modifications were made.

The Early Years Bandings are for children working within the Early Years Foundation Stage (aged 2-the end of Reception). There is a separate set of bandings for children working within the National Curriculum, year 1 to 11; this is to ensure that the descriptors take account of the different developmental and curricular needs. The descriptors are designed to enable emerging needs to be identified swiftly in order to support early identification and intervention and should be revisited in the light of the response to intervention.

The Bandings are intended to be part of a wider SEND sector-led improvement programme and exist in conjunction with the Haringey Early Years Best Practice Guide, and the duties of Early Years Settings to provide adapted learning environments and quality-first teaching. They are not intended to replace complimentary services such as those provided by Health Visitors and Children's Centres.

Finally, no Banding or set of descriptors will provide a full and accurate description of the entirety of a child or young person's needs and presentation, in every instance care and attention must be given to emerging difficulties and parental concerns as they know their children best.

The structure of the banding document

The bands are set out from 1-4. As a rough guide:

Band 1	Children make expected or better progress in a rich inclusive learning environment. They may experience developmental delays in some areas but these resolve with high quality teaching and short term interventions
Band 2	Children make expected or better progress with a personalised programme of targeted support or adapted early learning environment less than 50% of the time. Needs are likely to be developmental or delayed, including sensory or medical needs that they do not yet have the maturity to manage independently.
Band 3	Children make steady progress from their starting points when provided with personalised support and an adapted early learning environment more than 50% of the time. Needs are likely to be persistent and significant and across all the prime areas of the EYFS
Band 4	Children require the ongoing input of 3 or more specialist practitioners such as speech and language, occupational and physiotherapists, social workers, in addition to a highly personalised early learning environment. Needs will be persistent and significant and across education, health and care

The descriptors set out in this banding document are organised according to the four areas of need identified within the 2015 SEND Code of Practice which have been interpreted to be considered within the areas of learning and development identified within the Early Years Foundation Stage. This is to ensure the approach takes account of developmental differences which may resolve with early intervention as well as children who have special educational needs and /or disabilities.

Cognition and learning including play

Support for learning difficulties may be required when children and young people learn at a slower pace than their peers, even with appropriate scaffolding. This will cover a wide range of needs, from children who have delayed play skills due to limited access to enabling environments and positive relationships to those with moderate learning difficulties (MLD), severe learning difficulties (SLD), where children are likely to need support in all areas of the curriculum and associated difficulties with mobility and communication, through to profound and multiple learning difficulties (PMLD), where children are likely to have severe and complex learning difficulties as well as a physical disability or sensory impairment.

Communication and interaction

In our banding framework, we have separated Communication and Interaction into two areas – Speech and Language and Social Communication

Speech and Language

Many children and young people experience difficulties with speech and language. These might include difficulties with producing speech sounds accurately, stammering, voice problems, understanding language and using language (words and sentences). Everyone with speech and language needs is different and may have difficulty with one, some or all of the different aspects of speech, language or communication at different times of their lives. Some difficulties are short-term but others will be more permanent and remain throughout childhood and adult life. Sometimes a child or young person's language disorder is associated with an underlying or co-concurring condition such as hearing loss, cleft palate, neurodevelopmental conditions and genetic conditions. However, there are times when there may be no clearly identifiable cause.

Social Communication

Children may have difficulties with interacting and engaging in social situations and early learning environments with or without having speech and language needs. This may be attributed to a different way of thinking and processing information and may particularly, but not exclusively, apply to neurodiverse children and young people.

Personal, Social and Emotional Development

Children's personal social and emotional development is rapid in the early years and their skills should always be considered in relation to what is appropriate for their age. Some children may experience difficulties which make it hard for them to form relationships with adults and peers or separate confidently from their primary caregiver. They may become withdrawn or isolated, or display challenging, disruptive or disturbing behaviour. The underlying causes of emotional dysregulation are likely to be varied and may include a challenging start to life or neurodiversity.

Sensory and/or physical needs

Some children require special educational provision because they have a disability which prevents or hinders them from making use of the educational facilities generally provided. These difficulties can be age related and may fluctuate over time. Many children and young people who require support with vision or hearing, or who have a multi-sensory impairment (MSI), will require specialist support and/or equipment to access their learning, or habilitation support. Some children with a physical disability (PD) require additional ongoing support and equipment to access all the opportunities available to their peers. Some children with a medical need may need high levels of adult support until they have the maturity to manage their condition themselves.

How to use the banding descriptors

The banding descriptors do not specify how needs will be met – that is a matter for the setting, parents and the professionals who know the child well to consider together, but it does include indicative levels to help plan support. The strategies and provision needed to meet the child's needs will be agreed as part of the child's SEN support planning.

In assessing a child or young person's needs against the banding descriptors, educational professionals and parents or carers should recognise the impact that high quality provision can have on the presentation of special educational needs. It is therefore critical that this document is read alongside Haringey's agreed approach to ordinarily available provision; which are set out in the Haringey Early Years Best Practice guide Early Years SEND Best Practice Guide 2023-2024 (September 2023) (haringey.gov.uk) –These set out what every Early Years setting in Haringey should provide for all children with a special educational need. The expectation is that these descriptions of need represent what a child can do, and the learning challenges they face, after appropriate and good quality provision has been made. The descriptors of need are not designed to compensate for poor quality or inconsistent support.

Children's needs often change rapidly in the Early years as they grow and develop and in response to the support and Early Years Education they receive as well as changes in educational context and setting (for example moving from nursery to primary education). It is therefore recommended that the agreed banding is reviewed six monthly or more frequently in response to an unexpected change or crisis. In the case of children with an EHCP, this will form part of the annual review.

Understanding common terms used in the banding descriptors

In reading the banding descriptors you will see the words mild, moderate, significant, severe and profound used frequently. We are aware that in some contexts these words might have very specific medical or therapeutic definitions. However, in this document we are using these words in a pragmatic and non-technical way to describe the extent to which a child or young person's needs impact on their learning and their life. In general, throughout this document:

Mild describes needs which cause a child or young person some difficulty on a fairly regular basis, but which can be overcome with relatively light-touch help and support.

Moderate describes needs which often cause a child or young person difficulties, but with applied, consistent and well directed support can be addressed effectively.

Significant describes needs which have an ongoing and serious impact on a child or young person's learning and ability to access the curriculum and requires a much more intensive and individualised support offer to manage well.

Severe describes needs which impact on most areas of learning and to a great degree. Support required will be more specialised and intensive, and is likely to be required long-term.

Profound describes the highest level of needs, which affect all areas of life and learning and require the highest levels of support to manage safely and effectively in an educational setting.

Area of Need	Band 1	Band 2	Band 3	Band 4	Evidence
Cognition and learning including play	Birth to Five/ Development Matters shows less than 12month delay in play and learning skills	Haringey Portage Checklist/Birth to Five shows delay of 12 -24 months AND play shows typical developmental patterns	Haringey Portage Checklist shows delay of 24 months or more AND/OR Play skills are disordered and repetitive	Severe and multiple learning needs. Attainment levels likely to remain at early developmental stage throughout their education	*Haringey Portage Checklist. Educational Psychologist Advice. Paediatrician Report. 2 year old Developmental Check*
Communication and Language: Speech and language	Haringey LEEP Screen indicates AMBER needs	Haringey LEEP screener indicates RED needs	Pre-verbal or emerging verbal language in the severe range for their age	Child has no functional communication system. Needs are likely to be complex, severe and life long.	*Haringey LEEP Screener, SALT Report*
Communication and Language: Social Communication	Child has 4 or 5 ticks on Step 1 of LEEP screen.	Child has 0-3 ticks on Step 1 of LEEP screen	Child has 0-3 ticks on Step 1 of LEEP screen AND/ OR Severe difficulties for age in attention and concentration and staying on task even for highly motivating activities	Severe and multiple learning and communication needs. Attainment levels likely to remain at early developmental stage throughout their education	*Haringey LEEP Checklist, Haringey Portage Checklist. Educational Psychologist Advice. Paediatrician Report. 2 year old Developmental Check*
Personal, Social and Emotional Development	Some periods of difficulties with transitions and/or accessing activities independently	Separation difficulties which persist throughout the session after settling in period AND/OR Child needs frequent adult intervention	Child has not formed a strong relationship with any significant adult in the setting AND/OR child has experienced	Severe and multiple and complex needs. Child needs bespoke curriculum and personalised intervention supported by SEND	*Educational Psychologist Advice, Personal Risk Assessment* *Social worker advice*

		to regulate emotions multiple times per session leading to reduced access to available activities AND/OR Difficulties engaging in routine leading to withdrawal or challenging behaviour AND/OR lack of awareness of danger leading to risky behaviour compared to other children of their age	significant early life disruption AND/OR unable to regulate emotions even with a high level of adult support AND/OR no awareness of danger which causes harm to self or others.	specialists daily to access EYFS.	
Physical and Sensory: Vision	Prescribed glasses and needs encouragement to wear them. Patches/treatment for squint. Temporary mild sight impairment.	Moderate to severe sight impairment some requiring adaptations of resources and teaching strategies.	Severe sight impairment requiring significant adaptations of resources and teaching strategies.	Sensory loss plus complex needs requiring significant adaptations of resources and teaching strategies.	*Medical Reports, QTVI Recommendations*
Physical and Sensory: Hearing	History of temporary conductive hearing loss such as glue ear (no hearing aids)	Permanent unilateral hearing loss. Permanent bilateral Mild/ Moderate hearing loss requiring aiding with behind the ear hearing aids, bone anchored hearing aid etc	Permanent bilateral Severe/ Profound hearing loss requiring aiding with behind the ear hearing aids, bone anchored hearing aid, cochlear implants etc.	Sensory loss plus complex needs requiring significant adaptations of resources and teaching strategies.	*Audiology Report, QTOD recommendations*
Physical and Sensory: Sensory	Child's sensory regulation needs can be met by adjustments to the environment	Child's sensory processing needs regularly require adult intervention to be regulated and access the EYFS	Child's sensory processing needs significantly limit their ability to access EYFS AND/OR frequently cause the child to be distressed AND/OR Child needs high levels of adult supervision	Sensory Processing Needs are severe and multiple and complex needs. Child needs bespoke curriculum and personalised intervention supported by SEND specialists daily to access EYFS.	*Sensory Profile, OT Advice. Medical Reports*

			due to risk of danger to self or others		
Physical and Sensory: Sensory	Any identified needs are well managed and do not impact access to EYFS	Physical needs require specialist interventions or equipment which require adult support	Non-mobile or restricted movements. Child needs high levels of adult supervision due to risk of danger to self or others	Requires constant supervision or assistance with long term medical/physical needs AND/OR Requires 24hr positioning and reliant on adult support for all intimate and self-care needs	*Therapy Advice, Vale Mobility Service Report, Medical Report*
Physical and Sensory: Medical	Medical condition managed within adult ratio in setting e.g., mild asthma, anaphylaxis	Medical condition which limits child's ability to access EYFS e.g., moderate to severe epilepsy or diabetes AND/OR eating or drinking difficulties requiring a modified diet AND/OR Persistent toileting problems requiring close adult supervision	Medical condition which requires continuous adult support to access EYFS Significant eating and drinking difficulties e.g., gastronomy fed.	Significant health needs e.g., tracheostomy which require continuous support from medically trained professionals	*Health Care Plan. Medical Reports*

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Appendix Six Haringey SEND banding descriptors.

(Changes as a result of consultation are in red)

Introduction

Haringey Local Authority and its partners are committed to strengthening the systems of support for all young people with SEND. Haringey recognises that SEND is a broad term which includes the vast range of special educational needs and disabilities many of our young people manage, sometimes living with these permanently, and other times for a shorter period.

To ensure our resources are used efficiently, it is essential to ensure that systems for allocating additional resources (beyond those expected in our inclusive schools) are transparent, fair and based on need.

As a step towards addressing this, a set of banding descriptors has been developed over the course of 2022/23 working across our partnerships to provide a guide to levels of SEN need, so that there is greater transparency and understanding of how needs are identified, and the provision made to meet those needs. We hope that the grid will be multi-functional – provide both a tool to assess need, but also pointers for possible target setting to support young people to move towards independence.

The banding descriptors are designed to align with Haringey's graduated response to children and young people with SEND and with the guidance for when to seek an EHC assessment.

The banding descriptors were developed during the Autumn Term 2022 and throughout 2023. They have been developed by a working party of SENCOs, therapists and other educational professionals, parents and carers and local authority SEND officers. The Bandings were open to public consultation in Autumn 2023 and as a result further modifications were made.

The Bandings are for children working within the National Curriculum, year 1 to 11 (year 14 in school sixth form). There is a separate set of bandings for children working within the Early Years Foundation Stage; this is to ensure that the descriptors take account of the different developmental and curricular needs.

The Bandings are intended to be part of a wider SEND sector-led improvement programme and exist in conjunction with the Haringey SEND Core standards, and the duties of schools to provide adapted learning environments and quality-first teaching. They are not intended to replace complimentary services such as CAMHS or Family Support.

Finally, no Banding or set of descriptors will provide a full and accurate description of the entirety of a child or young person's needs and presentation, in every instance care and attention must be given to the impact of the child's needs on their ability to learning and consideration given to how the child is presenting at home (to indicate behaviours like' masking') and should be considered within the wider context of the child's lived experience.

The structure of the banding document

The bands are set out from A to H. As a rough guide:

Band A	Universal provision
Band B	SEND support
Band C	Children and young people whose needs may require support beyond high quality teaching and school-based targeted interventions, as set out in the SEND Support Guidance for Haringey. However, if these needs are addressed early and quickly it could result in a child being able to access the curriculum within the ordinary offer of education.
Band D	Children and young people requiring an EHCP.
Band E	Children and young people requiring an EHCP, but with progressively more support in a mainstream setting.
Band F	Children and young people requiring an EHCP, but with the highest level of support in a mainstream setting.
Band G	The level of need at which the majority of children and young people are likely to require a place in a special school but may in limited cases be supported in a mainstream school with very high levels of support.
Band H	The highest level of need. Exceptional and rare needs.

The descriptors set out in this banding document are organised according to the four areas of special educational need and disability set out in the 2015 code of practice, rather than by specific SEND diagnoses. The four areas of need in the code of practice are:

Cognition and learning

Support for learning difficulties may be required when children and young people learn at a slower pace than their peers, even with appropriate scaffolding. Learning difficulties cover a wide range of needs, including moderate learning difficulties (MLD), severe learning difficulties (SLD), where children are likely to need support in all areas of the curriculum and associated difficulties with mobility and communication, through to profound and multiple learning difficulties (PMLD), where children are likely to have severe and complex learning difficulties as well as a physical disability or sensory impairment. Specific learning difficulties (SpLD), affect one or more specific aspects of learning. This encompasses a range of conditions such as dyslexia, dyscalculia and dyspraxia.

Communication and interaction

In our banding framework, we have separated Communication and Interaction into two areas – Speech and Language and Social Communication

Speech and Language

Many children and young people experience difficulties with speech and language. These might include difficulties with producing speech sounds accurately, stammering, voice problems, understanding language and using language (words and sentences). Everyone with speech and language needs is different and may have difficulty with one, some or all of the different aspects of speech, language or communication at different times of their lives. Some difficulties are short-term but others will be more permanent and remain throughout childhood and adult life. Sometimes a child or young person's language disorder is associated with an underlying or co-concurring condition such as hearing loss, cleft palate, neurodevelopmental conditions and genetic conditions. However, there are times when there may be no clearly identifiable cause. This is known as developmental language disorder.

Social Communication

Children may also have difficulties with interacting in social situations with or without having speech and language needs. This may be attributed to a different way of thinking and processing information and may particularly, but not exclusively, apply to neurodiverse children and young people. The profile for every child with SLCN is different and their needs may change over time. They may have differences with one, some or all of the different aspects of speech, language or social communication at different times of their lives. Autistic Children and young people are likely to have different ways of interacting and different social rules and etiquette. They may also experience differences with how they interpret and process language and how they communicate. They may show some differences in flexibility of thought, planning and be more literal in their understanding. This can affect how they relate to others, and vice versa. When evaluating children's social communication needs, the impact of home life and also adaptation behaviours such as masking must be considered.

Social, emotional and mental health difficulties

Children and young people may experience a wide range of social and emotional difficulties which manifest themselves in many ways. These may include becoming withdrawn or isolated, as well as displaying challenging, disruptive or disturbing behaviour. The underlying causes of emotional dysregulation are likely to be varied and may include trauma, anxiety and neurodiversity. Behaviours may also include self-harming, substance misuse, eating disorders or

physical symptoms that are medically unexplained. Other children and young people may have disorders such as attention deficit disorder, attention deficit hyperactive disorder or attachment disorder.

Sensory and/or physical needs

Some children and young people require special educational provision because they have a disability which prevents or hinders them from making use of the educational facilities generally provided. These difficulties can be age related and may fluctuate over time. Many children and young people who require support with vision or hearing, or who have a multi-sensory impairment (MSI), will require specialist support and/or equipment to access their learning, or habilitation support. Children and young people with an MSI have a combination of vision and hearing difficulties. Some children and young people with a physical disability (PD) require additional ongoing support and equipment to access all the opportunities available to their peers. For deaf children consideration should be given to the impact of the hearing loss on the child's learning, for example a child with a bilateral hearing aids who has acquired hearing loss in later childhood could require more support than a child with a well-established cochlear implant despite having less severe hearing loss.

How to use the banding descriptors

The descriptors in each band are cumulative, but not every child or young person will exhibit all the characteristics and difficulties listed. Many children will experience needs at different levels across different aspects for the framework. It is the role of education professionals, working with parents and the child or young person, to decide on the band which 'best fits' the child or young person's needs. The expectation is that banding allocations will be fairer and more rounded if they are developed through dialogue between several professionals, the parent or carer and, where appropriate, the young person.

The banding descriptors do not specify how needs will be met – that is a matter for schools, parents and the LA to consider together, but it does include indicative levels to help plan support. The strategies and provision needed to meet the child's needs will be agreed as part of the child's SEN support planning.

In assessing a child or young person's needs against the banding descriptors, educational professionals and parents or carers should recognise the impact that high quality provision can have on the presentation of special educational needs. It is therefore critical that this document is read alongside Haringey's agreed approach to ordinarily available provision; which are set out in the SEND Core Standards: https://www.haringey.gov.uk/children-and-families/local-offer/sendcospace/sendcorestandards –These set out what every school in Haringey should provide for all children with a special educational need. The expectation is that these descriptions of need represent what a child can do, and the learning challenges they face, after appropriate and good quality provision has been made. The descriptors of need are not designed to compensate for poor quality or inconsistent support.

A child or young person's needs are likely to change over time in response to the support and teaching they have received, the changes in educational context and setting (for example moving from primary to secondary education) and their own maturity. It is therefore recommended that the agreed banding is reviewed once a year, or more frequently in response to an unexpected change or crisis. In the case of children with an EHCP, this will form part of the annual review. We hope that the banding descriptors will provide ideas for targets to reduce dependence and planning to support greater independent access to

the curriculum. However, we also recognise that for some children and young people, for example those with degenerative conditions, supporting and enabling greater independence over the child or young person's time in education will not be possible.

Understanding common terms used in the banding descriptors

In reading the banding descriptors you will see the words mild, moderate, significant, severe and profound used frequently. We are aware that in some contexts these words might have very specific medical or therapeutic definitions. However, in this document we are using these words in a pragmatic and non-technical way to describe the extent to which a child or young person's needs impact on their learning and their life. In general, throughout this document:

Mild describes needs which cause a child or young person some difficulty on a fairly regular basis, but which can be overcome with relatively light-touch help and support.

Moderate describes needs which often cause a child or young person difficulties, but with applied, consistent and well directed support can be addressed effectively.

Significant describes needs which have an ongoing and serious impact on a child or young person's learning and ability to access the curriculum and requires a much more intensive and individualised support offer to manage well.

Severe describes needs which impact on most areas of learning and to a great degree. Support required will be more specialised and intensive, and is likely to be required long-term.

Profound describes the highest level of needs, which affect all areas of life and learning and require the highest levels of support to manage safely and effectively in an educational setting.

Cognition and Learning

	Band A Universal	Band B SEN Support	Band C SEN Support Plus	Band D High Needs	Band E High Needs	Band F High Needs	Band G High Needs	Band H High Needs
Attainment and progress	Attainment levels are close to average, CYP are progressing at a steady rate and responding to high quality teaching and short-term interventions.	Attainment levels are well below average and CYP is making limited progress in response to high quality teaching and targeted sustained intervention. End KS4 – working towards level 1 and level 2 qualifications.	Attainment levels are well below average and CYP is making very limited progress despite high quality teaching and sustained targeted intervention. End KS4 – working towards level 1 , moving on to level 2 qualifications in Post 16 Sudden unexpected incident e.g accident, illness or trauma may impact on CYP's ability to make progress.	Working significantly below age related expectations in most subjects (alongside significant needs in other areas) for example: • End of EY – 2 years delay • End of KS1 – 2 years delay • End KS2 – working at Y3 level • End KS 3 – working Y4 level • End KS4 – working towards Entry level and level 1 qualifications.	Working significantly below age related expectations (alongside significant needs in other areas) and the gap continues to widen: • End of EY – 3 years delay • End of KS1 – 3 years delay • End KS2 – working below Y2 level • End KS 3 – working below Y3 level • End KS4 – working towards Entry level	Band E plus additional needs in other areas of SEN in mobility and coordination, communication or acquisition of self-help skills. Additional needs must be at least at band E level. Lack of academic progress may impact on social, emotional and mental wellbeing, due to isolation. End KS4 working towards Entry level or vocational qualifications.	Severe and Multiple Learning Difficulties Attainment levels at early developmental stage throughout their education.	Band G plus additional needs in other areas of SEN (totally physically dependent, neurological, genetic or other medical condition which results in profound needs in other areas of SEN). Additional needs must be at least at band G level.
Core skills	May have some difficulties with reading, writing, spelling or mathematics.	Greater difficulty than peers in acquiring basic literacy and numeracy skills and in understanding concepts. Mild difficulties in reasoning and problem-solving skills.	Moderate difficulties in acquiring literacy and numeracy skills, in retaining information, generalising and problem-solving skills.	Significant difficulties in acquiring literacy and numeracy skills, retaining information, generalising skills, and problem-solving skills.	Severe difficulties in acquiring literacy and numeracy skills, in retaining information generalisation, transferring and problem-solving skills.	Some difficulties accomplishing personal care, self-help and independence skills throughout the day.	Severe difficulties accomplishing personal care, self-help and independence skills throughout the day.	Almost all aspects of personal care and self-care would be carried out by an adult.

Focus and attention	May have some difficulty organising written work, expressing and/or recording ideas.	Mild but persistent difficulties with organisational and presentational skills, and with attention and concentration.	Difficulty working alone. Moderate difficulties in attention and concentration and staying on task. May have slower processing skills and need more time to respond to instructions.	Significant difficulties in attention and concentration and staying on task. May have significantly slower processing skills and need more time to respond to instructions.	Severe difficulties in attention and concentration and staying on task.	Severe difficulties in attention and concentration and staying on tasks even for highly motivating time-limited activities.	With adult support the child can only maintain arousal and attention levels where they are in just the right state for short periods of time	The child is unable to maintain arousal and attention levels at a level where they are not either in a low arousal state or an extremely distressed state which prevents engagement in any learning.
Response to intervention	Time-limited and evidence-based interventions are very successful in enabling CYP to overcome challenges.	Evidence based interventions enable CYP to make good progress.	Needs persist despite evidence-based interventions.	Needs persist despite evidence- based interventions, including those recommended by an external professional.	Small steps of progress with higher levels of evidence-based interventions	Very limited progress with higher levels of evidence-based interventions	The highest levels of evidence-based interventions have very little impact.	The highest levels of evidence-based interventions have very little impact.
Accessing curriculum	Little to no curriculum adaptation needed.	Difficulties necessitate some alteration of the curriculum and support.	Cannot access the curriculum without modification to programmes and materials which allows for repetition and over-learning.	Cannot access the curriculum without significant modification to programmes and materials which allows for repetition and over-learning.	Difficulties necessitate alteration of the curriculum which may include a personalised curriculum to enable a more limited pace of learning with a more functional curriculum for an extended period, or learning in shorter and more concentrated bursts to maintain focus.	Difficulties necessitate alteration of the curriculum which will include a personalised curriculum to enable a more limited pace of learning with a more functional curriculum for an extended period.	Adapted learning environment with high levels of adult support and a personalised curriculum focused on functional skills and developing independence.	Highly personalised curriculum necessary focused on the engagement profile and skills such as showing with their bodies that they recognise a familiar person

	Communication and interaction							
	Speech and language							
	Band A **Universal**	**Band B** **SEN Support**	**Band C** **SEN Support Plus**	**Band D** **High Needs**	**Band E** **High Needs**	**Band F** **High Needs**	**Band G** **High Needs**	**Band H** **High Needs**
Language skills	Language skills which mean the child can access an age-appropriate curriculum. In-school language screen indicates the CYP's language skills are within average range.	Mild to moderate difficulties with language which may be identified through an in-school language screen. Difficulties should not be attributable to their level of English acquisition and home language skills must always be considered	Moderate difficulties with language, which may be identified through an in-school language screen. Difficulties should not be attributable to their level of English acquisition and home language skills must always be considered	Significant difficulty with language as shown by screening or assessment. Language difficulties are causing regular and frequent difficulty in accessing the curriculum and participating effectively in learning.	Severe difficulty with language causing difficulties with functional communication and difficulties learning and forming social relationships.	Very severe difficulties with language causing limited functional communication and significant barriers to learning and to social relationships. Functional language abilities are impaired to a degree that prevents effective communication with most peers and adults.	Severe to profound difficulties with language which affect their ability to communicate successfully with all but those most familiar to them, even with contextual support.	Profoundly limited language skills; non-verbal and very limited or no understanding of language or other means of communication.

Understanding	May have difficulties with comprehension, and ability to follow instructions,	Difficulty with understanding the language of the classroom. Some difficulties in processing and responding to verbal information. May have difficulties in understanding and carrying out 2 to 3 instructions, or in following instructions appropriate for their age.	Difficulties in understanding have some impact on ability to be an independent learner within the school or setting. Difficulties in understanding, including subject specific vocabulary, which impacts on accessing the full curriculum.	Difficulties in understanding classroom language including longer instructions and those with more complex grammar and vocab. Difficulties in understanding and following instructions are impacting on learning and independence.	Difficulty understanding simple instructions with a range of adults and peers.	Able to understand only highly modified language including assistive and augmentative systems (means of communicating without talking).	Reliant on assistive and augmentative systems (means of communicating without talking) to enable them to make their needs and wishes known. Difficulty in using supportive systems without the support of a trained adult.	Almost wholly reliant on assistive and augmentative systems with the support of a trained adult. For some children augmentative or supportive systems are inaccessible, even if highly supported by an adult with specialist knowledge of the child.
Speech	Can be understood in most situations.	May show unusual aspects of speech such as unusual intonation, volume, and idiosyncratic phrases.	Listeners have to use high levels of exploratory questioning and visual scaffolds to ensure accurate interpretation of the pupil's message.	Persistent difficulties with speech which impact significantly on intelligibility and literacy skills. Speech may only be intelligible to familiar adults.	Severe difficulties with speech which constantly impact on intelligibility and communication. Speech may only be intelligible to familiar adults.	Speech intelligibility limited to familiar words used in context	Very reliant on familiar adults' interpretation of their needs.	Uses subtle means of communication which may be missed by an unfamiliar person.
Expressive language	CYP may have difficulties with giving accounts of events or conveying more abstract and complex thoughts.	May have difficulties in using a range of grammatically correct sentence structures for their age. May have some word finding difficulties or muddle word order.	May have difficulties with creating sentences, narratives or choosing accurate words.	Mainly communicates in single words and very simple sentences.	Some single words may be clear but connected speech remains poor.	Uses basic verbal communication alongside non-verbal communications which may be very idiosyncratic	Reliant on tools to respond to options to meet needs, for example "yes", "no" to a question. CYPs communicate by gesture, eye pointing or AAC device	Reliant on tools to respond to options to meet needs, for example "yes", "no" to a question. CYPs communicate by gesture, eye pointing or AAC device
	Social communication							
	Band A **Universal**	**Band B** **SEN Support**	**Band C** **SEN Support Plus**	**Band D** **High Needs**	**Band E** **High Needs**	**Band F** **High Needs**	**Band G** **High Needs**	**Band H** **High Needs**

Social communication skills	Occasional misunderstanding of social cues and situations. May be reluctant to comment in class/group situations due to needs.	More regular misunderstanding of social cues and situations which can lead to anxiety or frustration. Able to access the curriculum with some adjustments to support social communication differences.	Frequent misunderstanding of social cues and situations, which can lead to frustration, anxiety or distress and can impact on the ability to engage in classroom activities. May need curriculum adapted to suit social communication differences and support processing.	Misunderstanding of social cues and situations which significantly impacts on the ability to engage in learning and some classroom activities.	Misunderstanding of social cues and situations which severely impacts on the ability to engage in all classroom activities. Likely to withdraw from communication in class or interact in unexpected ways in the classroom.	Misunderstanding of social cues and situations which severely impacts the ability to regulate emotions and causes regular high levels of distress and anxiety which present serious barriers to learning.	Misunderstanding of social cues and situations which profoundly impact on all areas of learning and ability to function within the educational setting throughout the day including social times.	Misunderstanding of social cues and situations which profoundly impact on all areas of learning and which lead to daily, persistently high levels of distress and anxiety.
Forming friendships	Mostly confident with occasional difficulty integrating or fulfilling social activity	Regularly experiences difficulty in forming and maintaining friendships which may be caused by immaturity or learning needs.	Regular (daily) difficulties in playing and / or interacting with other CYP appropriately leading to verbal or physical disruptions that can sometimes be resolved by an adult 'debrief'. Frequent unexpected responses to adults or other CYP that may be perceived as rude or disruptive and that need adult support to develop understanding. May need intensive but time limited adult support in forming or reforming friendships if existing friendships break down.	Limited initiation of social interaction but can take part in some imaginative play if taught/supported but does not yet show signs of developing this independently. Regularly participates in solitary activity which is unusually focused on a special interest.	Finds it hard to see beyond their own point of view- unable to play games or interact on other people's terms Limited social interaction with language difficulties having severe impact on learning in all subjects.	May approach others paying little or no attention to their responses- leading to a lack of real sustained friendships. Unable to engage in most social activities- becoming more isolated from other CYP.	Unable to engage in almost all social activities-becoming very isolated from other CYP.	Inability to tolerate any social interaction other than meeting own basic needs.

Expressing feelings	May struggle at times to express their feelings in an age-appropriate way.	May show literal use and interpretation of language. May respond unexpectedly in social and/or learning environment.	Regularly experiences difficulties in understanding and expressing their feelings appropriately which may at times lead to anxiety, frustration, low self-esteem, isolation, or withdrawal behaviour. Responds positively to calming strategies.	Has difficulty expressing feelings in most social and learning contexts. Engages in limited social interaction and language difficulties have a significant impact on learning in most subjects.	Difficulties expressing emotions which leads to distressed behaviours and increased anxiety on a daily basis. May show signs of distress, confusion or shutting down. Likely to be misunderstood and respond inappropriately.	Severe difficulties expressing emotions which leads to frequent distressed behaviours and increased anxiety multiple times a day.	Severely limited recognition of own or others' emotions.	Profoundly limited recognition of own or others' emotions.
Relationships	May experience some difficulties in making and/or sustaining relationships, but able to work in a group with other peers and adults.	Difficulties in forming and maintaining positive relationships, which also prevents being able to cooperate/ work in a group with other peers and adults and impedes functioning in learning tasks.	Difficulties in forming and maintaining positive relationships, which also prevents being able to cooperate/ work in a group with other peers and adults and impedes functioning in learning tasks. Some connection seeking or avoiding behaviours, likely to be reliant on relationships with key adults or peers.	Significant difficulties in building and maintaining successful relationships with adults and peers. Isolated from peers, has few friendships and may be vulnerable to exploitation. Difficulties understanding social and physical risks.	Severe difficulties in building and maintaining successful relationships with adults and peers. Difficulties understanding social and physical risks and their own vulnerability, severely limited ability to understand consequences of actions.	Severe difficulties in being able to manage his/her actions and how they may affect themselves and others.	Severe difficulties in being able to manage his/her actions and how they may affect themselves and others resulting in unpredictable behaviours which cause further isolation from others.	Highly complex needs leading to profound difficulties in being able to manage his/her actions and how they may affect themselves and others resulting in unpredictable behaviours which causes high levels of risk to themselves and/or further isolation from others.

Social Emotional and Mental Health								
	Band A **Universal**	**Band B** **SEN Support**	**Band C** **SEN Support Plus**	**Band D** **High Needs**	**Band E** **High Needs**	**Band F** **High Needs**	**Band G** **High Needs**	**Band H** **High Needs**
Attention to tasks	May experience low level/low frequency difficulties with working independently or following adult directions, requiring encouragement to stay on task	Mild difficulty with maintaining and directing attention and concentration.	Moderate difficulties with maintaining and directing attention but responds well to adult intervention.	Significant difficulties with maintaining concentration and attention which limits learning and participation. May display a strong need to assert independence, autonomy or control of a situation or environment.	Severe difficulties within maintaining concentration and attention prevent learning and participation. May display a strong need to assert independence, autonomy or control of a situation or environment.	Profound difficulties with maintaining concentration and attention prevent almost all learning and participation without significant adaptation.	Persistent state of distress means CYP is unable to engage in most aspects of the curriculum. Needs a highly adapted, bespoke curriculum and learning environment.	Persistent state of distress means CYP is unable to engage in the curriculum or any activities.

Emotional regulation	Sometimes needs support with transition or leaving parent. CYP involved in occasional incidents in or out of lessons.	Difficulty understanding and managing their emotions, exhibits regular changes in mood. Involved in regular incidents in and outside of lessons.	Difficulties identifying and managing emotions in themselves and others accurately but can apply strategies when supported by an adult. Involved in frequent incidents in and outside of lessons.	Struggles to self-regulate leading to prolonged experience of stress which may be exhibited inwardly or overtly. Weekly incidents which involve behaviours which challenge others.	Daily dysregulation which involves behaviours which challenge others and which sometimes compromise the safety and health of themselves and others. Challenges with self-regulation which result in being unable to engage in lessons on a daily basis. Difficulties with engagement with anyone other than a key adult.	Dysregulation multiple times a day which involves behaviours which challenge others. Severe difficulties in accepting requests or consequences or engaging in restoration. Risk of harm to self and others Challenges with self-regulation which result in being unable to engage in lessons multiple times a day.	Frequent, intense and prolonged dysregulation. High risk of harm to self and others	Very frequent and persistent dysregulation which is extremely difficult to manage, even with specific, individualised intervention and co-regulation. Adaptive responses to stress or long term trauma means that focus of behaviour is on survival Very high risk of harm to self and others.
Attendance	May show some anxiety around learning or the school environment.	Re-integration support needed due to periods of absence	Intermittent or poor attendance affects social and academic functioning which require a school-based intervention.	Poor attendance and/or school avoidance has a significant impact on learning and requires ongoing intervention.	Severely reduced access to curriculum due to periods of dysregulated behaviour or emotionally based school avoidance.	Unable to access learning or school environment even with bespoke curriculum and on-going personalised intervention.	Unable to access learning or school environment even with bespoke curriculum and on-going personalised intervention.	Unable to access learning or school environment even with bespoke curriculum and on-going personalised intervention.
Mental health	May experience limited lack of confidence or low self-worth.	Low self-worth, seeks approval and reassurance repeatedly but yet still appears to remain insecure. Levels of anxiety impact on learning, relationships and attendance and need sustained adult support.	Sudden, unexpected or short-term additional needs for example as a result of bereavement, trauma or life change.	May have mental health needs that significantly impact on learning and activities throughout the week.	May have an assessed mental health need that significantly impacts on learning and activities on a daily basis.	Mental health needs significantly impact on daily learning and relationships with others.	Complex, mental health needs which impact on daily life.	Complex, chronic and/or multiple mental health needs which impact on daily life.

Managing change	May experience low level/low frequency difficulties with following classroom routines, responding to social situations such as turn taking, reciprocal attention, sharing of resources, social isolation or low-level anxiety in social situations.	Has a strong need for things to be predictable and clear, and when routines are disrupted, or there are unexpected changes this can cause some difficulty in accessing the curriculum. Difficulties switching between activities. Often needs support with transitions.	Regularly experiences difficulties in understanding change or social expectations which leads to errors in actions / choices but do not pose risk of harm to pupil or others. Regularly needs support with transitions.	Frequently shows signs of anxiety or distress when faced with new people, places, events or uncertainty.	Frequently experiencing distress when changing focus or moving between activities. Appearing distracted/ self-occupying or frequent use of self-soothing actions due to distress caused by changes in the environment. Changes in the environment prevent CYP from filtering anything else in the environment, interacting with others, or learning.	Avoidance, self-occupying and other actions due to stress, change or uncertainty make it difficult to engage in learning. These can lead to severe anxiety, and distressed behaviour on a daily basis.	Demand avoidant, distressed behaviours with high levels of anxiety which become the main focus for the CYP, not allowing them to be able to process anything else.	Extremely high levels of anxiety which impact upon their wellbeing and ability to engage in all contexts.

Sensory and/or physical

Vision

	Band A **Universal**	**Band B** **SEN Support**	**Band C** **SEN Support Plus**	**Band D** **High Needs**	**Band E** **High Needs**	**Band F** **High Needs**	**Band G** **High Needs**	**Band H** **High Needs**
Degree of vision loss	Vision within normal range up to needing to be twice as close to objects to see them (6/6-6/12 SnellenLogMAR 0.0-0.3) Bilateral vision impairment Unilateral amblyopia (lazy eye), monocular vision.	Mild to Moderate vision impairment, needing to be up to three times as close to objects to see them: 6/12-6/19 Snellen (LogMAR 0.3-0.5) Likely to need clear print and/or enlarged print to point size N14-18 May have fluctuating vision in different	Moderate vision impairment needing to be up to four times as close to objects to see them (6/12-6/24 Snellen LogMAR 0.5 – 0.6) leading CYP to fall behind peers. Near vision: likely to have difficulty with print sizes smaller than 18 point or equivalent sized details in pictures. Resources would	Moderate to severe vision impairment ranges from needing to be 4 to 6 times closer to objects to see them (6/24-6/38 Snellen LogMAR 0.6-0.8) Clear print and/or modified large print to point size N18-N24	Severe vision impairment ranges from needing to be 6 to 8 times closer to objects to see them (6/38-6/48 Snellen LogMAR 0.8-0.9) Likely to need modified large print to point size N24-N36 in addition to visual aids. CYP may have Cerebral Visual Impairment (CVI) – these pupils may have	Severe vision impairment ranges from needing to be 8 to 10 times closer to objects to see them(6/48-6/60 Snellen LogMAR 0.9-1.0) Will need modified large print point size N36-N48 in addition to visual aids.	Severe vision impairment: needing to be more than 10 times closer to objects to see them (6/60 – 6/120 Snellen LogMAR 1.0-1.3) Will need modified large print to point size N48 or larger in additional to visual aids.	Severe vision impairment: needing to be more than 10 times closer to objects to see them (More than 6/120 Snellen LogMAR 1.3 and above) Registered severely sight impaired (SSI).

		educational environments.	need to be enlarged/modified. May have gradually deteriorating vision. May need a visual aid to access curriculum		normal or near normal visual acuities but will display moderate to significant visual processing difficulties.		Registered severely sight impaired (SSI).	
Impact on learning	If undergoing a vision occlusion programme (patching) CYP may need environmental changes such as sitting closer to the focal point of the lesson to allow for their temporary deterioration of vision.	May have difficulties with spatial awareness, using standard text and pictorial materials e.g., maps and graphs.	In addition, CYP may find concentration difficult due to visual fatigue, make frequent "copying" mistakes, have poor hand-eye coordination and/or have slow work rate.	Curriculum access may require significant modification and/or adaptations of curriculum materials. May not be able to see details on a white board without approaching to within 1 metre from it.	Access to the curriculum requires substantial individual differentiation and adaptation of the majority of materials in all areas of the curriculum.	Access to the curriculum requires substantial individual differentiation and adaptation of material in all areas of the curriculum.	Able to access curriculum only with assistive devices and requires substantial modification and/or adaptations of materials.	Able to access curriculum only with assistive devices and requires substantial modification and/or adaptations of materials.
Mobility, independence & social wellbeing	Independently mobile	Independently mobile in familiar areas. In unfamiliar areas may need orientation and familiarisation. May miss facial expressions, body language or gestures of others. May need support with social interactions and building friendships.	Mobility skills may be affected, requiring access to assessment and support if needed. May need emotional support to develop a sense of their positive identity, resilience, independence, and self- esteem. May need support with social interactions and building friendships.	May need assessment of mobility skills at transition points in their education. Will need to be within 1m to see people's facial expressions, body language and gestures. Will need structured support with social interactions and building friendships	Will need orientation skills and may need assessment for cane training and independent living skills teaching and habilitation skills. Will need emotional support to develop a sense of their deaf identity, resilience, independence, self-esteem.	Able to access buildings and move around the school only with regular and individual formal teaching of orientation and mobility. This may include white cane training.	Able to access buildings and move around the school only with regular and individual formal teaching of orientation and mobility. This may include white cane training.	Able to access buildings and move around the school only with regular and individual formal teaching of orientation and mobility. This may include white cane training.
Access and vision technology	Vision can be corrected by glasses.	Curriculum access possible with vision aids (eg magnifiers) use of accessibility options when using laptops, tablets and phones, specialist accessibility IT	May need specialist software and hardware for curriculum access	Curriculum access not possible without significant modification and/or adaptations of curriculum materials requiring training to produce resources	Able to access curriculum only with substantial adaptations of most learning materials requiring training to produce resources and additional	Able to access curriculum only with substantial adaptations of all learning materials requiring training to produce resources.	Able to access curriculum and buildings only with substantial adaptations of all learning materials requiring training to produce resources,	Able to access information using braille/tactile methods which require specialist training to produce resources.

		equipment, adaptation of materials.		and additional support in practical subjects (safety). May benefit from use of braille and/or tactile materials.	support in practical subjects to enable safe participation. Will need use of braille and/or tactile materials.	Specialist ICT will likely be required and additional support in all subjects. Will need use of braille and/or tactile materials	ICT and additional support in practical subjects. Will need use of braille and/or tactile materials.	Some may learn specialist Braille code for Maths, Science, Music and Languages, as well as the Literary Code.
	Hearing							
	Band A **Universal**	**Band B** **SEN Support**	**Band C** **SEN Support Plus**	**Band D** **High Needs**	**Band E** **High Needs**	**Band F** **High Needs**	**Band G** **High Needs**	**Band H** **High Needs**
Degree/level of hearing loss	Hearing within normal range (0 to 20 dB)	The deafness is likely to be permanent and at least 'Mild' in level (hearing loss 20 dB–40dB) Unilateral/Mild Hearing Loss/Fluctuating conductive Late diagnosis or onset, bilateral or unilateral. Could be an acquired hearing loss, congenital or progressive hearing loss.	May have a moderate sensorineural hearing loss (41 to 70 dB) or a permanent conductive hearing loss. May have auditory neuropathy and/or other hearing difficulties Late diagnosis or onset, bilateral or unilateral.	The deafness is likely to be permanent and at least 'Moderate' in nature (average hearing thresholds between 41-70dB) May have auditory neuropathy and/or other hearing difficulties Late diagnosis or onset, bilateral or unilateral.	The deafness will be permanent and at a severe level (average hearing thresholds between 71-90dB). May have auditory neuropathy and/or other hearing difficulties. Late diagnosis or onset, bilateral or unilateral.	The deafness will be permanent and severe to profound. (average hearing thresholds 71dB to 95dB May have auditory neuropathy and /or other hearing difficulties. Late diagnosis or onset, bilateral or unilateral.	The deafness will be permanent and profound (in excess of 95dB) May have auditory Neuropathy and/or other hearing difficulties. Late diagnosis or onset, bilateral or unilateral.	The deafness will be permanent and Profound level (in excess 95dB) May have auditory neuropathy and /or other hearing difficulties. Late diagnosis or onset, bilateral or unilateral.
Impact on Learning	May have listening difficulties, particularly with background noise and may mis-hear and mis-understand spoken information which may require class teacher checking and understanding.	Deafness that affects access to the curriculum, possible with specialist equipment, adaptation and support; for example, hearing aids, good acoustic conditions.	Curriculum access may require moderate modification and/or adaptations of curriculum materials.	Curriculum access may require significant modification and/or adaptations of curriculum materials. Support may use British Sign Language and/or other visual approaches	Access to the curriculum requires substantial individual differentiation and adaptation of material in the majority of materials in all areas of the curriculum. Support may use of British Sign Language	Access to the curriculum requires substantial individual differentiation and adaptation of material in all areas of the curriculum. All teaching and support are likely to involve the use of British Sign Language	Able to access curriculum only with assistive devices and requires substantial modification and/or adaptations of materials. All teaching and support are likely to involve the use of British Sign Language	Able to access curriculum only with assistive devices and individual adaptation of materials such as through the use of a communication support worker All teaching and support are likely to involve the use of

					and/or other visual approaches	and/or other forms of visual communication or oral/auditory communication.	and/or other forms of visual communication or oral/auditory communication.	British Sign Language and/or other forms of visual communication or oral/auditory communication.
Hearing Technology	No hearing supports required.	Hearing aid/s **may** be issued .	Hearing aid/s (including bone anchored hearing aids) essential. Radio aid likely to be necessary. CYP able to be able to use hearing aid/s independently with minimal support	Hearing aid/s (including bone anchored hearing aids) essential. CYP may not be able to use hearing aid/s independently. Radio aid likely to be necessary. Access to excellent acoustic listening conditions essential	Hearing aid/s (including bone anchored hearing aids) essential. Radio aid essential. Access to excellent acoustic listening conditions essential	Hearing aid/s (including bone anchored hearing aids, Cochlear Implant, Auditory Brainstem Implant) essential. Radio aid essential. Access to excellent acoustic listening conditions essential	Hearing aid/s (including bone anchored hearing aids Cochlear implant, Auditory Brainstem Implant) essential. Radio aid essential. Access to excellent acoustic listening conditions essential.	Hearing aid/s (including bone anchored hearing aids Cochlear implant, Auditory Brainstem Implant) essential. Radio aid essential. Access to excellent acoustic listening conditions essential.
Communication and Social Wellbeing	Hearing does not impact on CYP's ability to communicate or form relationships.	May have difficulties with communicating with peers or other adults due to audiological access. CYP may need emotional support to develop a sense of their positive deaf identity, resilience, independence, and self- esteem. CYP may need structured support with social interactions and building friendships	Language levels may show some delay identified through appropriate assessment. Functional language abilities may impact on effective age-appropriate communication. CYP may need emotional support to develop a sense of their positive deaf identity, resilience, independence, self-esteem. CYP may need structured support	May have speech and language difficulties e.g. poor sentence structure and delayed grammar structures. Functional language abilities will impact on effective age-appropriate communication. CYP will need emotional support to develop a sense of their positive deaf identity, resilience, independence, self-esteem. CYP will need structured support	Likely to have speech and language difficulties e.g. poor sentence structure and delayed grammar structures. Functional language abilities will impact on communication and may result in limited social relationships CYP will need emotional support to develop a sense of their positive deaf identity, resilience, independence, self-esteem.	Likely to have speech and language difficulties e.g. poor sentence structure and delayed grammar structures. Functional language abilities will impact on communication and could result in limited social relationships CYP will need emotional support to develop a sense of their positive deaf identity, resilience, independence, self-esteem.	Likely to have speech and language difficulties e.g. poor sentence structure and delayed grammar structures. Functional language abilities will impact on communication and could result in limited social relationships CYP will need emotional support to develop a sense of their positive deaf identity, resilience, independence, self-esteem.	Likely to have speech and language difficulties e.g. poor sentence structure and delayed grammar structures. Functional language abilities will impact on all communication and result in social isolation CYP will need emotional support to develop a sense of their positive deaf identity, resilience, independence, self-esteem.

			with social interactions and building friendships	with social interactions and building friendships	CYP will need structured support with social interactions and building friendships	CYP will need structured support with social interactions and building friendships	CYP will need structured support with social interactions and building friendships	CYP will need structured support with social interactions and building friendships
	Physical and/or medical needs							
	Band A **Universal**	**Band B** **SEN Support**	**Band C** **SEN Support Plus**	**Band D** **High Needs**	**Band E** **High Needs**	**Band F** **High Needs**	**Band G** **High Needs**	**Band H** **High Needs**
Overall impact on learning	Physical development broadly in line with average. CYP attempts all physical activities. CYPs may have lower than average fine or gross motor skills.	Can move independently but has some stability or motor coordination difficulties. CYP has difficulties relating to tasks involving fine and gross motor skills, which require reasonable adjustments and additional planning. CYP may tire more quickly.	Impaired motor functions, affecting dexterity or mobility within school, which would without intervention, hamper access to curriculum. Exhibits fatigue, lack of concentration or motivation due to their physical or medical needs, which is having a marked effect on performance. May need specialist equipment overseen by a trained member of staff.	Physical needs give rise to safety issues. Curriculum and environment access may not be possible without modification and/or adaptations of curriculum materials and/or adaptive equipment.	Curriculum access not possible without considerable modification and adaptation of curriculum materials e.g., scaffolding, physical/neurological difficulties requiring support for recording.	Severe physical, medical, or neurological condition which impacts on all areas of independent learning and/or emotional wellbeing throughout the day.	CYP has a long-term and/or progressive condition and is reliant on adult support or supervision for moving, positioning, personal care including drinking eating.	Profound physical, long-term, and progressive, life limiting condition/needs. Has total and complex support needs for mobility, personal care, positioning, movement, hoisting and eating/drinking/ suctioning.

Health or medical needs	Medical needs are well managed and do not impact on access to the curriculum.	Physical/medical condition which requires specialist nursing support (for example diabetes or epilepsy) may impact on access to the curriculum and require medication and monitoring.	Medical interventions/close monitoring which have a moderate impact on curriculum access and daily routines are required. Medical and/or physical needs that may require time-limited periods of intensive support (eg fluctuating needs) Learning affected by health problems and hospital visits	Medical interventions/close monitoring which have a significant impact on curriculum access and daily routines are required.	Medical interventions/close monitoring which have a severe impact on curriculum access and daily routines are required	Medical needs including feeding, sleeping and medication which lead to the child failing to thrive and the need for ongoing support of medical professionals.	Medical needs are fluctuating and can lead to frequent emergency situations, for example unstable seizure activity or suctioning.	Health care needs require highly structured and complex medical interventions authorised by medical professionals, very likely to require fast staff response and administration of emergency rescue medication. H* - Any child eligible for continuing health care. Interventions actioned by a medical professional.

Mobility	Fully independently mobile.	Can move and position independently but may have stability and/or gross/fine motor coordination difficulties. They can make independent use of available safety features of the school environment, such as hand rails and sloped walkways and can walk up and down stairs.	Mild disability. May use walking aids, with only occasional adult assistance. May have a reduced ability to run or jump, hand function may be restricted. Mobility, speed, balance and co-ordination can be affected, particularly over medium to long distances. Crowded areas or confined spaces can compromise balance	Moderate disability. Pupil is mobile with use of walking aids, but may need more frequent adult assistance. Impaired motor functions, affecting dexterity or mobility within school, which would without intervention, directly obstruct or hamper access to the curriculum	Severe disability. Uses wheeled mobility for longer distances, outdoors and in the community – self-propel, powered or requires physical assistance with manual chair Needs specialist seating and/or other specialist equipment. Physical skills may fluctuate and/or deteriorate during a day.	Severe disability. Needs access to a wheelchair (adult supported) for movement. Needs specialist seating and/or other specialist equipment. Environmental adaptations to access school curriculum. For example, ramping, widening doorways, provision of care-suite for hygiene or adapted toilet facilities	Children have profound difficulty performing physical skills including limited ability to maintain head and trunk posture; limited ability to control movement of limbs. Uses manual wheelchair or powered chair at all times in the setting May require frequent or prolonged positioning Requires support in and personal care, eating/drinking needs	Requires hoisting to improve head alignment, seating or standing and all transfers. Physical limitations are not fully compensated by equipment. Pupil needs 2 adults for transfers Utilises specialist equipment to enable access to curriculum and activities of daily living e.g. hoisting, complex modular seating systems, toileting equipment, manual handling aids such as transfer boards. For some children sourcing appropriate equipment is very difficult due to the complexity of their needs.
Independence	Can manage own medical, and self-care needs with minimal support.	Can manage own intimate, and self-care need with minimal adult support. May have needs relating to undertaking practical tasks.	Requires targeted, but time limited, adult support in administrating/ participating in routines/ interventions to manage their condition.	Limited independence in managing interventions required for their condition e.g., personal care, movement, compared with what would be expected for their age.	Very limited independence in managing interventions required for their condition e.g., personal care, movement, compared with what would be expected for their age.	Requiring some adult support for most of their toileting, eating and drinking needs. CYP might be aware of toileting needs and routine; and be able to participate in aspects of this.	CYP are most reliant on adult support for care routines, which can be carried out by an educational professional.	Wholly reliant on adult support for all intimate and self-care needs. CYP are likely to have care routines that have to be authorised by a trained professional or specialist medical carer.

Mental health and wellbeing	May experience low self-esteem or low-level anxiety as a result of physical differences or medical needs.	May have physical and/or medical differences, which may make CYP self-conscious, isolate, or behave erratically.	May have physical and/or medical differences, which may make CYP self-conscious, isolate, or behave erratically.	Physical and/or medical condition may impact on their self-esteem, social interactions and emotional regulation.	Physical and/or medical condition impacts to a great extent on their self-esteem, social interactions, and emotional regulation.	Physical and/or medical condition severely impacts on their self-esteem, social interactions, and emotional regulation.	Physical and/or medical condition severely impacts on their self-esteem, social interactions, and emotional regulation.	Physical and/or medical condition profoundly impacts on their self-esteem, social interactions, and emotional regulation.
Response to sensory inputs	Not atypically affected by sensory inputs and any anxiety related to unusual sights or sounds is short-lived.	May experience anxiety and present with varying levels of responsiveness to sensory input with unusual interest in sensory aspects of the environment. This can fluctuate.	Presents with varying responsiveness to sensory input, with a moderate impact on their engagement in learning. Can be supported with sensory breaks and input.	Presents with varying responsiveness to sensory input, easily distracted/upset by noise/touch/light, leading to some distressed /unexpected behaviour. Sensory inputs may include auditory, visual, touch, movement, oral or a combination of these factors. May need frequent sensory breaks and input to regulate.	Presents with varying responsiveness to sensory input causing regular distress. May exhibit active sensory seeking behaviours such as running or shouting, or the need for eating or chewing. May need adult support to remove themselves from situations of sensory overload. With regular sensory breaks and input the CYP is often still significantly dysregulated and/or showing signs of high sensory alert.	Presents with varying responsiveness to sensory input which is causing regular and frequent distress. With regular sensory breaks and input the CYP is often still severely dysregulated.	Extreme sensory challenges on a daily basis. With regular sensory breaks and input the CYP is still severely dysregulated. Sensory challenges for those with complex medical needs may include dystonia or fitting triggered by loud noises or flashing lights.	Extreme sensory challenges on a daily basis. With regular sensory breaks and input the CYP is still profoundly dysregulated. Sensory challenges for those with complex medical needs may include dystonia or fitting triggered by loud noises or flashing lights. PMLD CYP often need specialist sensory input in order to engage at all.

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Equality Impact Assessment (EQIA)

The Equality Impact Assessment (EQIA) form is a template for analysing a policy or proposed decision for its potential effects on individuals with protected characteristics covered by the Equality Act 2010.

The council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council recognises the profound and far-reaching impacts of socioeconomic disadvantage treats socioeconomic status as a local protected characteristic.

1. Responsibility for the Equality Impact Assessment

Name of proposal:	**SEND Bandings and Top-ups**
Service Area:	**SEND**
Officer Completing Assessment:	**Mary Jarrett**
Equalities Advisor:	**Vlada Shevelkova**
Cabinet meeting date (if applicable):	**6 February 2024**
Director/Assistant Director	**Jackie Difolco**

2. Executive summary

The proposal is to revise the Banding Descriptors which are used by Haringey Council to indicate the levels of support required by children with SEND to enable them to meet the outcomes specified in their SEN Panel or Education, Health and Care Plan (EHCP). An EHCP is a Statutory Plan which must be reviewed annually and describe a child's special education needs, provision to meet these needs and the outcomes which they are working towards.

Analysis of equalities data suggests that children with SEND are disproportionately boys (70%); additionally, those from Black and Black British/Caribbean groups are overrepresented in the SEND population. families. A greater understanding of these cohort and their needs is being considered via the Racial Equality in Education Group as the complexities and intersectionality of this data sample is not straightforward. It is intended that greater transparency of Banding and a continuum of funding across mainstream and special schools will support children according to their needs

regardless of where they live within Haringey, or the choices made in relation to the decision to place them in mainstream or special schools.

The EQIA will be reviewed annually to ensure consistency of approach across SEND.

3. Consultation and engagement

3a. How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff? Detail how your approach will facilitate the inclusion of protected groups likely to be impacted by the decision.

Initial Consultation and engagement took place via a Stakeholder delivery group prior to the proposed revised bandings and top-ups formulation being drafted.

Key stakeholders included parents and carers, Special schools, Maintained Schools and Academies, Nurseries and pre-school provision.

Prior to going to Cabinet there has been an 8-week public consultation via the Local Offer web-site, supported by a communications campaign which ensures that young people and their families are aware of the new Banding and Top-ups formulation.

The consultation included meetings with parents and carers of those who will be most affected by the new bandings, primarily parents/ carers of boys from black Caribbean or African families; and children and young people who are disabled, in particular those with autism and speech, language and communication needs, with events hosted by the Markfield Project and Haringey Parent Carers Forum.

Provisions were made to ensure that families, schools and other parties have sufficient time to respond to proposed changes. Accessibility needs were accommodated by providing translated and/or large print copies of the consultation on request. The consultation was promoted so as to maximise reach and seek the views of interested families and parties as far as possible

3b. Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

The consultation responses indicated broad agreement with the

proposed changes with some useful suggested amendments and indicated that SEND consultations, whilst offering an outlet for expressing wider discontent in the system, also offer a useful opportunity for the Local Authority to ensure that it has access to wider opinions and a chance to develop good practice informed by both practitioners, parents and carers.

Consultation responses were mainly received from parents and carers of children and young people with SEND with some comments from practitioners. A summary of the key responses are outlined below. Refer to: Appendix Three: Bandings and Top Ups Consultation feedback and responses. As a result of the responses to consultation amendments have been made to the original Bandings Framework.

For ease they are marked in red on Appendices Four and Five attached to the Cabinet report (Proposed Bandings) A summary of the key responses are outlined below

a) Recognition of the wider SEND improvement agenda of which these Bandings form a part of.
b) Inclusion of the importance of impact as well as severity of Hearing Loss in determining children's needs in this area.

c) Recognition and consideration of the impact of 'masking' behaviours for children with social communication difficulties.
d) Recognition of the interface between the Early Years Bandings (Which apply to children in earlier stages of their development assessed by their good levels of development) and the school-age Bandings which assess older children's ability to function within a school-based learning environment and achievements in relation to the National Curriculum (including entry-level learning).

4. Data and Impact Analysis

Note: officers may want to complement their analysis with data from the State of the Borough and ward profiles, found here: https://www.haringey.gov.uk/local-democracy/about-council/state-of-the-borough.

Please consider how the proposed change will affect people with protected characteristics.

4a. Age

Jan 2023 School census				
Age	EHC	SEN Support	Not SEN	All pupils
1	0.0%	0.0%	0.1%	0.1%
2	0.1%	0.4%	0.7%	0.6%
3	0.4%	2.8%	3.7%	3.4%
4	3.3%	4.7%	6.5%	6.1%
5	7.3%	5.6%	7.6%	7.3%
6	7.3%	6.2%	7.4%	7.3%
7	8.5%	8.1%	7.3%	7.4%
8	7.1%	7.9%	7.1%	7.2%
9	8.6%	8.4%	7.3%	7.5%
10	9.1%	8.9%	7.2%	7.5%
11	10.3%	7.0%	6.9%	7.1%
12	8.4%	6.9%	7.2%	7.2%
13	8.0%	7.1%	7.1%	7.2%
14	8.5%	7.5%	7.2%	7.3%
15	6.8%	8.0%	7.0%	7.1%
16	3.2%	5.1%	4.8%	4.7%
17	1.9%	3.6%	3.6%	3.5%
18	1.1%	1.5%	1.2%	1.2%
19	0.2%	0.1%	0.0%	0.0%

Data

Borough Profile[1]

56,718: 0-17 (21%)
72,807: 18-34 (27%)
68,257: 35-49 (25%)
44,807: 50-64 (17%)
28,632: 65+ (11%)

[1] Source: State of the Borough

Target Population Profile

The new SEND bandings will impact all young people aged 0-19 in full-time education in a Haringey early years setting, mainstream or special school or academy.

Potential Impacts

The policy will affect young people aged 0-19 in education who have an identified Special Education Need or Disability. The policy will increase the number of Banding descriptions available to categorise support for children with SEND in Haringey and will ensure that all children with SEND are described within the Bandings and Top-up framework, rather than the current position which only identifies children with EHCPS and defines the top-up provision rather than the needs of the child.

It is evident that a more comprehensive framework to describe the needs of children with SEND in Haringey will create a fairer and more transparent funding system for all children and young people, and therefore impact this cohort positively.

The new top-up and bandings framework will allow Haringey to ensure that financial decisions to support children with SEND are equitable, fair, open and transparent; and further that such decisions are made within the financial framework available to the Council.

EHCP's will continue to clearly outline in detail, the provision required for children and young people with sufficient flexibility to meet individual and assessed needs which will be monitored through the statutory annual review process.

The financial envelope for the High Needs Block Grant is based on a national formula based on pupil numbers. Funding allocations to the bandings are agreed by the Schools Forum. Where schools may be adversely affected financially as a result of the new bandings, financial modelling support will be provided by Haringey Schools Finance to Schools to asses the impact of any changes and any options to minimise impact. This may include adopting a phased incremental approach and/ or a review of pupil numbers.

4b. Disability[2]

Data
Borough Profile [3]

4,500 people have a serious physical disability in Haringey.
19,500 aged 16-64 have a physical disability this equates to approximately 10% of the population aged 16-64.
1,090 people living with a learning disability in Haringey.
4,400 people have been diagnosed with severe mental illness in Haringey.

Target Population Profile

Breakdown of disability within the school age population is as follows:

[2] In the Equality Act a disability means a physical or a mental condition which has a substantial and long-term impact on your ability to do normal day to day activities.
[3] Source: 2011 Census

Primary Need SEN type	% of pupils - Jan 2023
Not SEN	82.7%
ASD	3.2%
HI	0.4%
MLD	1.7%
MSI	0.0%
NSA	0.5%
OTH	0.8%
PD	0.3%
PMLD	0.1%
SEMH	2.5%
SLCN	4.9%
SLD	0.2%
SPLD	2.5%
VI	0.1%

The data demonstrates that Haringey have a range of children with disabilities who access mainstream and special schools and early years settings in Haringey with an overrepresentation of SEN needs for Autism, Speech and Language and Social, Emotional and Mental Health (SEMH)

Impact

The proposed policy will have a positive impact on young people's life chances by ensuring that they have access to education and to the support required to enable them to achieve their outcomes.

The members of this group will receive better support through a more comprehensive needs analysis used to inform their support needs in school; the proposed banding and top-ups formulation will support fair, open and transparent decision-making.

The intention of these policies is to narrow the inequality of outcomes for SEND children and young people by providing a range of support descriptors designed to meet their individual needs.

4c. Gender Reassignment[4]

Data

Borough Profile

There is no robust data at Borough level on our Trans population, however the central government estimates that there are approximately 200,000-500,000 Trans people in the UK. Assuming an average representation, this would mean between 800 and 2,000 Haringey residents are Trans.[5]

Target Population Profile

There are a small number of transgender young people attending Haringey Schools and some of these young people have SEND. We do not have reliable data regarding this.

[4] Under the legal definition, a transgender person has the protected characteristic of gender reassignment if they are undergoing, have undergone, or are proposing to undergo gender reassignment. To be protected from gender reassignment discrimination, an individual does not need to have undergone any specific treatment or surgery to change from one's birth sex to ones preferred gender. This is because changing ones physiological or other gender attributes is a personal process rather than a medical one.

5 Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.

The individual needs of transgender young people will be addressed via their individual assessments. The new Framework allows for detailed consideration of the social, emotional and mental health needs of children and young people with SEND.

This policy will not disproportionately affect transgender young people.

4d. Marriage and Civil Partnership

Data

Borough Profile [6]
Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (8.2%)
In a registered same-sex civil partnership: (0.6%)
Married: (33.3%)
Separated (but still legally married or still legally in a same-sex civil partnership): (4.0%)
Single (never married or never registered a same-sex civil partnership): (50.0%)
Widowed or surviving partner from a same-sex civil partnership: (3.9%)

Target Population Profile

We do not collect data regarding relationship status for SEND purposes. It is not anticipated that the policy affect or impact the parents of children or young people based on their marital status.

4e. Pregnancy and Maternity

Data

Borough Profile [7]
Live Births in Haringey 2019: 3,646

Target Population Profile

Impacts
This proposal is likely to have no known impacts and will not significantly affect women who are pregnant or who have a child under 1.

4f. Race

In the Equality Act 2010, race can mean ethnic or national origins, which may or may not be the same as a person's current nationality.[8]

Data

Borough Profile [9]
Arab: **0.9%**
Any other ethnic group: 3.9%

Asian: **9.5%**

[6] Source: 2011 Census
[7] Births by Borough (ONS)
[8] Race discrimination | Equality and Human Rights Commission (equalityhumanrights.com)
[9] Source: 2011 Census

Bangladeshi: 1.7%
Chinese: 1.5%
Indian: 2.3%
Pakistani: 0.8%
Other Asian: 3.2%

Black: **18.7%**
African: 9.0%
Caribbean: 7.1%
Other Black: 2.6%

Mixed: **6.5%**
White and Asian: 1.5%
White and Black African:1.0%
White and Black Caribbean: 1.9%
Other Mixed: 2.1%

White: **60.5% in total**
English/Welsh/Scottish/Norther Irish/British: 34.7%
Irish: 2.7%
Gypsy or Irish Traveller: 0.1%
Other White: 23%

Target Population Profile

The data demonstrates that whilst there is a small rise in children in Early Years there are falling numbers of children in London.

Data regarding children under 4 in Haringey

2021	2022	2023	2024	2025	2026	2027
17,845	17,907	18,007	18,095	18,176	18,250	18,318

The current population analysis of children with SEND compared to school population is as follows**:**

Ethnic group (Jan 2023 school census)	EHC	SEN Support	Not SEN	All pupils
Asian - Asian British/Any Asian Background	2%	1%	2%	2%
Asian - Asian British/Bangladeshi	3%	2%	3%	2%
Asian - Asian British/Indian	1%	1%	1%	1%
Asian - Asian British/Pakistani	1%	1%	1%	1%
Black - African	19%	13%	13%	13%
Black - Black British/Caribbean	8%	7%	5%	5%
Black - Other Black	3%	3%	2%	2%
Chinese	1%	1%	1%	1%
Information Not Obtained	2%	2%	2%	2%
Mixed - Any Other Mixed Background	8%	7%	7%	7%
Mixed - White And Asian	1%	1%	2%	2%
Mixed - White And Black African	1%	2%	2%	2%
Mixed - White And Black Caribbean	4%	4%	3%	3%
Other	6%	8%	9%	8%
Refused	1%	1%	1%	1%
Travellers White - Gypsy/Roma	0%	0%	0%	0%
Travellers White - Gypsy/Roma - Other	0%	0%	0%	0%
Travellers White - Gypsy/Roma - Roma	0%	0%	0%	0%
Travellers White - Traveller of Irish Heritage	0%	0%	0%	0%
White - British	16%	22%	20%	20%
White - Irish	1%	1%	1%	1%
White - Other White	21%	24%	28%	27%

The data demonstrates that children from Any Other Mixed, Black African and Black British or Caribbean, backgrounds are more likely to have an EHCP than other members of the school age population.

Potential Impacts

The delivery of more accurate needs analysis of children and young people with SEND demonstrated in the revised bandings and top-ups formulations supports the accessibility of education for a range of children, including those from ethnic backgrounds who are overrepresented in the SEND population. The transparency of the new system, including revised governance arrangements will support transparency of decision-making. Therefore, it is anticipated that there will be a positive impact on those with protected characteristics.

4g. Religion or belief

Data

Borough Profile [10]
Christian: 45%
Buddhist: 1.1%
Hindu:1.9%
Jewish:3%

[10] Source: 2011 Census

Muslim: 14.2%
No religion: 25.2%
Other religion: 0.5%
Religion not stated: 8.9%
Sikh: 0.3%

Target Population Profile

The SEND Team do not keep data in regard to children's religion, however the new SEND Bandings and Top-ups will apply to faith schools and academies which are maintained or academy settings in Haringey Local Authority.

Impacts

Provision of SEND Top-ups and Bandings which are consistently applied across the borough for children and young people with SEND facilitates parental choice and control regarding their child being enabled to attend a faith school which can meet their learning needs and outcomes. The bandings only affect mainstream and specials schools in Haringey, for those outside of Haringey, the impact will be neutral as current funding arrangements will continue.

4h. Sex

Data

Borough profile [11]
Females: (50.5%)
Males: (49.5%)

Target Population Profile

The profile of children with SEND demonstrates that boys are over-represented in the SEND system**.**

Sex	EHC	SEN Support	Not SEN	Grand Total
F	29.2%	37.3%	51.6%	48.7%
M	70.8%	62.7%	48.4%	51.3%

Further analysis of data in relation to SEND demonstrates that this over-representation of boys in SEND systems is wide-spread nationally and requires further analysis and attention.

Impacts

The provision revised SEND Bandings and Top-ups will ensure the fair, open and transparent consideration of children and young people's SEND needs and the allocation of resources to support them. It is therefore anticipated that the decision will have a positive impact on boys in the SEND system.

[11] Source: 2011 Census

4i. Sexual Orientation

Data

Borough profile [12]
3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013. In Haringey this equates to 6,491 residents.

Target Population Profile

The sexual orientation of young people with SEND is not currently recorded.

Impacts

The provision made within the policies will ensure that all young people are supported to attend and access education.

This proposal is likely to have no known impacts.

4j. **Socioeconomic Status (local)**

Data

Income
8.3% of the population in Haringey were claiming unemployment benefit on 9 December 2021.[13]
20.8% of the population in Haringey were claiming Universal Credit on 9 December 2021.[14]
29% of employee jobs in the borough are paid less than the London Living Wage.[15]

There appears to be a spread of children with EHCPs across the borough but most particularly in areas of the Borough most associated with high levels of socio-economic deprivation.

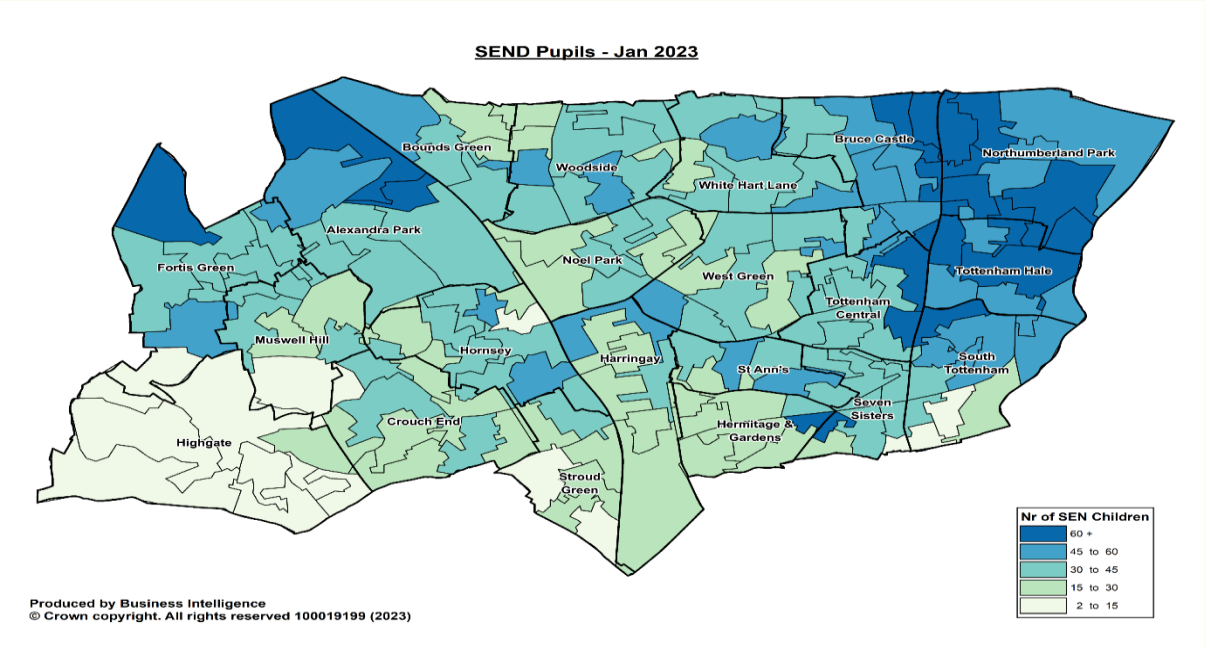
Educational Attainment
While Haringey's proportion of students attaining grade 5 or above in English and Mathematics GCSEs is higher than the national average, it is below the London average.[16]
4.4% of Haringey's working age populations had no qualifications in 2020.[17] 4.8% were qualified to level one only.[18]

Area Deprivation

Haringey is the 4th most deprived in London as measured by the IMD score 2019. The most deprived LSOAs (Lower Super Output Areas or small neighbourhood areas) are more heavily concentrated in the east of the borough where more than half of the LSOAs fall into the 20% most deprived in the country.[19]

Target Population Profile

[12] Source: ONS Integrated Household Survey
[13] ONS Claimant Count
[14] LG Inform
[15] ONS
[16] Source: Annual Population Survey 2019 (via nomis)
[17] LG Inform - qualifications
[18] LG Inform – level one
[19] State of the Borough (p.21)



This data suggests that whilst there are high proportions of children with SEND in areas of high deprivation (in the East), there are also high numbers of children with SEND in the more affluent areas of the Borough (in the West). These revised policies apply to all school-aged children educated in Haringey maintained and academy schools and early years settings and are designed to promote fair, open and transparent allocation of resources from the high needs block for all children with SEND. Haringey children and young people with SEND achieve better academic outcomes than children and young people with SEND in other authorities according to national data (see Haringey Matrix)

Impacts

Provision of fair, open and transparent resourcing, based on the needs of children and young people allows children and young people to be supported according to their needs which will promote education outcomes for children and young people in the Borough, including those who in the more deprived areas of the borough. Therefore, it is anticipated that the decision will have a positive impact on this protected group

%. Key Impacts Summary

5a. Outline the key findings of your data analysis.

The data regarding the users of the current SEND bandings and top-ups system (children with EHCPS) indicates that they are representative of the population of children and young people with SEND in Haringey for whom the service is provided.

b. Intersectionality

Consideration of intersectionality demonstrates the disproportionate number of boys with SEND, indicative over-representation from Black Caribbean and Black African boys within the SEND service. The SEND service will continue to support this cohort of young people and ensure that improved data collection informs our wider work and support evidence of impact.

5c. Data Gaps

There are significant data gaps regarding users of home-school SEND services which will be addressed via better monitoring and management via the new Liquid Logic software, including recording of religious faith and transgender identities.

6. Overall impact of the policy for the Public Sector Equality Duty

The proposal will increase equality of accessibility of education via provision of better described banding descriptors for children and young people with SEND needs, these will be subject to locally based governance arrangements which ensure that parents and schools work together to agree bandings and top-ups with the Local Authority ensuring that administrative practice is fair, open and transparent and subject to regular scrutiny and evaluation.

7. Amendments and mitigations

7a. What changes, if any, do you plan to make to your proposal because of the Equality Impact Assessment?

No major change to the proposal: the EQIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.

7. Ongoing monitoring

Service to create improved data monitoring systems to record access to service by children from different backgrounds and range of disabilities**.**

Full review to take place in January 2025 and reported to the SEND Executive Board re: impact and mitigation.

8. Authorisation

EQIA approved by (Assistant Director/ Director)	Jackie Difolco
Date	**20 December 2023**

9. Publication

Please ensure the completed EQIA is published in accordance with the Council's policy**.**

Please contact the Policy & Strategy Team for any feedback on the EQIA process.

Report for: Cabinet – 6 February 2024

Title: Determination of the Council's School Admission Arrangements for the academic year 2025/26

Report authorised by: Ann Graham, Director of Children's Services

Lead Officer: Carlo Kodsi, Head of Admissions and School Organisation, carlo.kodsi@haringey.gov.uk

Ward(s) affected: All

Report for Key/ Non Key Decision: Key Decision

1. Describe the issue under consideration

1.1. To continue to meet statutory requirements Cabinet are requested to determine the proposed admission arrangements for the school year 2025/26. These arrangements are in respect of the borough's community and voluntary controlled (VC) schools. Recommendations below (para. 3) also ask Cabinet to agree to their publication on or before 15 March 2024 on the Council's website, such details to include advice on the right of objection to the Schools Adjudicator.

1.2. This year the proposed admission arrangements for community and voluntary controlled (VC) schools included a proposal to reduce the published admission number (PAN) for several primary schools by one form of entry (1fE) – 30 Reception pupils each from September 2025/26. Table 1 at para. 5.6 below displays the list of schools where a reduction in PAN is being sought.

1.3. On 7 November 2023 Council's Cabinet agreed that statutory consultation should be carried out on the proposed admission arrangements between 24 November 2023 and 5 January 2024. This report provides details on, and an analysis of the representations received on all of our admission arrangements and makes recommendations on those proposed admission arrangements at para. 3 below.

2. Cabinet Member Introduction

2.1. As a result of a very full consideration of all the available evidence, the paper recommends that Cabinet agree to the proposal to reduce the published admission number (PAN) for the 3 primary schools listed in table 1 below by one form of entry (1FE) – 30 Reception pupils each. The full range of reasons for agreeing to the proposal are set out below from para 4.1 – para 6.39.

3. Recommendations

Cabinet is asked:

3.1. To consider and take into account the feedback from the consultation undertaken which is set out in appendix 8.

3.2. To consider and take into account the equalities impact assessment of the proposals on protected groups at appendix 7.

3.3. To agree the recommendation set out in this report to proceed with the proposal to reduce the published admission number (PAN) for the primary schools listed in table 1 below by one form of entry (1FE) – 30 Reception pupils each from September 2025.

3.4. To determine the Council's admission arrangements for the academic year 2025/26 as set out in Appendices 1 – 4.

3.5. To agree Haringey's fair access protocol as set out in Appendix 5 to come into force from 1 March 2024.

3.6. To agree that the determined arrangements for all maintained primary and secondary schools in the borough are published on the Council's website by 15 March 2024 with an explanation of the right of any person or body, under the School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) Regulations 2012, to object to the Schools Adjudicator in specified circumstances[1].

4. Reasons for decision

4.1. In common with many London authorities, Haringey has experienced a decrease in demand for reception school places for several years. This is due, in part, to the turbulence brought about by Covid-19 and Brexit. However, the decrease in applications is likely to reflect a wider set of factors at play that have been impacting demand for primary reception places for the past few years.

4.2. This has contributed to a higher than necessary number of reception places in some of Haringey's educational planning areas where supply is predicted to outstrip demand. This report sets out our continued response to the change in demand for reception places in the borough and seeks agreement from Cabinet to proceed with the proposal to reduce the published admission number (PAN) for the 3 primary schools listed in table 1 below by one form of entry (1FE) – 30 Reception pupils each from September 2025.

4.3. This follows agreement by Cabinet in February 2023 to reduce the planned admission number for 8 primary schools from September 2024. Falling rolls due to lower birth rates and out-migration rate has demanded changes to PAN in recent years whilst our Reception place surplus is forecast to grow further without more reductions. The proposals for reductions in PAN are designed to improve schools' ability to efficiently plan their staffing and educational provision by offering a more accurate number of places.

4.4. This work forms part of a bigger Education Strategy which places the LA as a catalyst and partner with the aim of creating resilience and reducing vulnerability in our schools. We have continued our conversation with school leaders and governors through a series of additional workshops (Autumn 2023) to explore collaboration and sustainability opportunities to ensure that schools can continue delivering a high quality of education. PAN reduction is one of several solutions that schools can explore, and future sustainability can also be achieved through other strengthening partnership e.g. amalgamations, soft/hard federations, and memorandums of understanding between schools etc.

5. Alternative options considered

3.1. We are not proposing a change to the oversubscription criteria for our community and VC schools for 2025/26. Whilst there are other ways admission arrangements can

[1] Paragraphs 19 – 24 of the Regulations

influence the allocation of school places set out in the Code (e.g., designated catchment areas, identified feeder schools or giving priority in our oversubscription criteria to children eligible for the early years premium/ pupil premium) no alternative option is being considered at the time of writing this report.

3.2. Although other London authorities (e.g. Camden and Hackney) have taken radical measures to address surplus capacity at primary level (school closures / amalgamations) this is not currently under consideration in Haringey. We are keen to maintain the mix and spread of all of our existing primary schools so that parents and carers have the optimum choice of school type and location.

6. Background information

6.1. The School Admissions Code 2021 requires all admission authorities to determine admission arrangements every year, even if they have not changed from previous years. Regulation 17 of the School Admissions Regulations 2012 also requires admission authorities to determine admission arrangements by 28 February in the determination year.

6.2. In addition, the Regulations require the admission authority to publish on its website by 15 March in the determining year the determined arrangements of all maintained primary and secondary school and academies in the borough, advising the right to object to the Schools Adjudicator, where it is considered that the arrangement do not comply with the mandatory provisions of the School Admissions Code 2021.

4.3 The Council consults on its admission arrangements annually irrespective of whether or not there is a proposed change to the arrangements. This is to ensure transparency and openness on the contents of the admission arrangements and to allow all stakeholders to make representations which can then be considered as part of the determination of the arrangements.

6.3. **Is there any change this year and what is the potential risk?** In Haringey, reductions in primary reception rolls have necessitated the Council to consider measures to reduce the PANs at some primary schools, where this provision exceeds local demand. This would allow schools to provide places where they are needed and to ensure they are financially and organisationally on a stronger footing than at present.

6.4. The Code sets out the requirement for all admission authorities to undertake statutory consultation where they propose a decrease to the published admission number (PAN) of schools. We are asking Cabinet to proceed with the proposal to reduce the published admission number (PAN) for the 3 primary schools shown in Table 1 below for entry to September 2025/26.

6.5. These schools have all been concerned about changes in their local demand for the past few years and all the governing bodies support the reduction since it will enable the schools to focus their budget and resources better for the reduced number of pupils resulting in a reduced number of fuller classes, so supporting school improvement. All the governing bodies agree they will support an increase should local demand for places rise. Importantly, whilst the process to reduce PAN requires considerable data and consultation, it is easy to reverse, so admissions authorities can quickly respond to a rise in demand and decide to admit over PAN on a temporary or permanent basis if and when this is needed.

6.6. In the case of schools that are their own admission authority (St Mary's Priory Junior, and St Francis de Sales RC Junior and St Ignatius RC Primary), the governing bodies

have delegated the responsibility to consult on a reduction in PAN to the Local Authority and Council's Cabinet for final decision. The governing bodies have agreed to keep numbers under review and if necessary, can decide to increase their PAN or add places on a temporary basis for a year at a time. These schools do not intend to revise their admission arrangements (e.g. oversubscription criteria) for 2025/26 and will not be consulting on this aspect.

Table 1 Proposed amendments to PANs for Consultation

Planning Area (PA)	School	Present PAN	Proposed PAN	Reduction
3	St Mary's Priory RC Junior	60	30	-30
3	St Ignatius RC	60	30	-30
4	St Francis de Sales RC Junior	90	60	-30

Schools in Planning Area 3

6.7. **St Mary's Priory** is a Catholic Infant and Junior Voluntary Aided School located at Hermitage Road, N15 5RE and sits within **planning area 3**. *A map of Haringey's planning areas can be found on Page 11 below.* The school normally admits 2 classes (60 Reception pupils) per year. However, due to a decrease in the demand for school places, we proposed to Cabinet last year to reduce the infant school PAN to 30 for the 2024/25 academic year. The current proposal is for a reduction in PAN to 30 for St May's Priory RC **Junior** for September 2025/26 to keep in pace with the smaller cohorts working their way through to the Junior school.

6.8. This proposed reduction last year was due to the school only filling 1 forms of entry in 2022, i.e., admission levels of 30 and that the projected demand for Reception places in planning area 3 suggests no additional need between 2024 and 2030. The school has seen a reduction in first place preferences from 51 in 2020 to 27 in 2022 whilst first place preferences for all schools in planning area 3 has fallen from 477 to 348. Approval was sought from the Schools Adjudicator for a temporary reduction in PAN2 for St Mary's Priory RC Infant school for entry in September 2022 and a reduction by 1 form of entry was agreed. Our projections indicate that demand is likely to continue to decline and the school will struggle to fill beyond 1 form of entry.

Schools in Planning Area 3

6.9. **St Ignatius RC** is a Catholic Primary school located at St Ann's Road, N15 6ND and sits within **planning area 3**. The school normally admits 2 classes (up to 60 Reception pupils) per year. However, due to a decrease in the demand for school places, we are proposing to reduce the school's PAN to 30 for the 2025/26 academic year. This proposed reduction is due to the school only filling 1 form of entry in 2023, i.e., admission levels of 30 and that the projected demand for Reception places in planning area 3 suggests no additional need between 2024 and 2030.

6.10. The school has seen a reduction in first place preferences from 42 in 2017 to 23 in 2023 whilst first place preferences for all schools in planning area 3 has fallen from 491 to 426. Approval was sought from the Schools Adjudicator for a temporary reduction in PAN for St Ignatius RC for entry in September 2023 and a reduction by 1 form of entry

[2] The Office of the Schools Adjudicator has jurisdiction to consider a proposed reduction of PAN via an in-year variation request.

was agreed. Our projections indicate that demand is likely to continue to decline and the school will struggle to fill beyond 1 form of entry.

Schools in Planning Area 4

6.11. **St Francis de Sales** is a Catholic Infant and Junior Voluntary Aided school located at Church Road, N17 8AZ and sits within **planning area 4**. The school normally admits 3 classes (90 Reception pupils) per year. However, due to a decrease in the demand for school places, we proposed to Cabinet last year to reduce the Infant school PAN to 60 for the 2024/25 academic year. The current proposal is for a reduction in PAN to 60 for St Francis de Sales RC Junior for September 2025/26 to keep in pace with the smaller cohorts working their way through to the Junior school.

6.12. The proposed reduction last year was due to the school only filling 2 forms of entry in 2022, i.e., admission levels of 60 and that the projected demand for Reception places in planning area 4 suggests no additional need between 2024 and 2030. The school has seen a reduction in first place preferences from 93 in 2018 to 49 in 2022 whilst first place preferences for all schools in planning area 4 has fallen from 726 to 599. Approval was sought from the Schools Adjudicator for a temporary reduction in PAN for St Francis de Sales Infant school for entry in September 2022 and a reduction by 1 form of entry was agreed. Our projections indicate that demand is likely to continue to decline and the school will struggle to fill beyond 2 forms of entry.

Can any risk be mitigated?

6.13. The proposals for reductions in PAN are to improve schools' ability to efficiently plan their staffing and educational provision and not reducing could lead to schools suffering financial pressures leading to deficits, which in the maintained schools could then require a loan, further adding to the pressure in the Dedicated Schools Grant.

6.14. The admissions arrangements and the PANs are proposed and agreed by admission authorities 18 months before implementation, in accordance with the requirements of the Code. Reducing the PAN for entry in September 2025/26 gives these schools sufficient time to review their internal structure so that any potential impact on staff reorganisation can be minimized. It will allow the school leadership teams in offering a more accurate number of places and also help with long term planning.

6.15. Equality consideration was given to the selection of these specific schools for a reduction in PAN to help frame any potential impact on protected groups. Any amendment to PAN and local/planning area capacity will be considered in the context of the effects on local provision, looking at recruitment patterns to local schools and ensuring that the knock-on effects in the adjustment of PANs is considered.

6.16. An equalities impact assessment (EqIA) is included at Appendix 7 and has identified a disproportionate impact on the basis of gender. There is a possibility that this proposal could adversely impact female teachers / female teaching assistants as several staff members at each school may be made redundant or re-deployed. This may be unavoidable as there is a greater ratio of female to male teachers and teaching assistants in primary schools across Haringey and across the country as a whole.

6.17. In terms of mitigating the impact on this equality characteristic, affected staff should be supported by appropriate HR procedures. The Council will support schools in ensuring all staff affected by the proposal are given access to redeployment options and support to find alternative roles within Haringey. To mitigate against any negative impact on staffing as a whole, we have ensured that the timing of the consultation and determination of admission arrangements allows the schools sufficient time to review

staff structure, including needing to take no action as a result of staff moving to jobs outside the school as part of a natural process, taking steps to redeploy staff to other departments/schools, not renewing short-term contracts or reducing the use of agency staff.

6.18. In the event that it is not possible for schools to avoid making posts redundant, where appropriate, the Council will consider defraying some of the costs of redundancy. Such matters will be considered on a case-by-case basis taking into account the schools' budget as well as what other options are or may be available to the schools.

6.19. All three schools are located in the Planning Areas with the most vacancies in the borough (Planning Areas 3 and 4) and the highest concentration of Catholic schools in near proximity to one another. This area is therefore one of the most acutely affected by unused places and the reduction in demand has impacted these school's ability to manage class sizes and effective pupil to teacher ratios. We are consulting on reducing PAN from September 2025 to assist these schools in managing the impact of lower pupil numbers.

6.20. Our proposal will not adversely impact on families trying to access their local school with high quality provision. A projected surplus of school places in the planning areas where these schools are located means that we expect sufficient places to still be available for local children.

6.21. Nearly all of Haringey primary schools are rated 'Good' or 'Outstanding' by Ofsted and are able to support children with a wide range of abilities, special needs, disabilities and learning difficulties, from able, gifted, and talented pupils to those with multiple and significant disabilities, medical conditions and learning difficulties. Even with these reductions in the overall number of reception places, we are confident that the needs of the community can be met at local schools. We will continue to closely monitor the number of primary applications received and, in the event that there is an increase in demand for primary school places and additional places are required, our schools can revert to their original PANs. In summary, at the current time, we don't expect a reduction in PAN at these schools to mean that any local children can't be offered a local school place.

6.22. Adjusting the number of school places upwards or downwards is a key and statutory function of place planning so as to respond to demand. We continually monitor the number of school places we have available to ensure we are able to meet demand for places but not create an over or under supply of places. Without careful place planning, we would either fail in our statutory duty to provide sufficiency of places or we oversupply places which creates a risk of serious financial burden on many of our primary schools. This in turn can negatively impact on schools' budgets and thus the quality of educational provision. School place planning is a statutory function for the Council and this consultation will help us to ensure that we are able to continue to meet this duty but not to overprovide places.

6.23. The main part of a school's budget is made up of per-pupil funding and our schools being full contributes towards financial security in our schools. A benefit of planning places judiciously to account for fluctuations in demand is that it keeps rolls relatively buoyant across and beyond any local area (also known as a school place planning area) as the number of places available closely matches the birth rate and inward migration to our borough.

6.24. More details on how we plan for the sufficiency but not oversupply of school places is set out in our annual school place planning report, available to view at www.haringey.gov.uk/schoolplaceplanning.

Demand for Reception places - downward trajectory

6.25. Table 2 below shows the number of Reception pupils between 2012 and 2023 in Haringey has generally been on a downward trajectory from a high of 3,259 in 2012 to 2,720 in January 2023 (equivalent to around 18 forms of entry). The latest projections from our 2023 School place planning report (SPPR) suggest demand for school places will not exceed 2,600 as far as our projections currently extend which is 2030/31. Projections from 2024 onwards show demand falling to a low of 2,434 Reception places in 2027/28.

Reception rolls between 2012/13 and 2022/23

Year	Reception roll as at January	Annual change	Percentage change over previous year	As a proportion of Jan 2013
2012/13	3,259 (Jan 2013)	61	1.9%	100%
2013/14	3,139 (Jan 2014)	-120	-3.7%	96%
2014/15	3,181 (Jan 2015)	42	1.3%	98%
2015/16	3,185 (Jan 2016)	4	0.1%	98%
2016/17	3,067 (Jan 2017)	-118	-3.7%	94%
2017/18	2,979 (Jan 2018)	-88	-2.9%	91%
2018/19	3,029 (Jan 2019)	50	1.7%	93%
2019/20	2,952 (Jan 2020)	-77	-2.5%	91%
2020/21	2,934 (Jan 2021)	-18	-0.6%	90%
2021/22	2,683 (Jan 2022)	-251	-8.6%	82%
2022/23	2,720 (actual Jan 2023)	+37	1.4%	83%

Source: 2012/13-2022/23 PLASC School Census

6.26. First place preferences data (which is a strong indicator of the overall demand for places) for September 2023 were very marginally higher than in September 2022 though there were variances at planning area level (last year's data in brackets). PA1: 554 (558) PA2: 536 (604) PA3: 365 (348) PA4: 608 (599) PA5: 625 (549). Though they were still significantly lower than in recent years. Total first place preferences since 2020 are as follows: 2020: 3,039, 2021: 2,562, 2022: 2,658, 2023: 2,688.

6.27. As of the 2023 May School census, Haringey has a surplus of **306** Reception school places (year of entry) equivalent to 10 forms of entry*. This equates to a 10.1% surplus across our primary school estate. This figure takes into account temporary reductions at several schools (150 places) agreed by the Schools Adjudicator for September 2022.
* 3,026 Reception settings exc. Special schools vs. 2,720 Reception pupils

6.28. The 2023 School Place Planning Report (SPPR) projects further growth in primary school vacancies between 2023 and 2030 which will place a growing financial burden on Haringey primary schools.

6.29. Pupil numbers can fluctuate year on year, but the aim is to have 5-10% vacancies which will ensure there will be places to meet parental demand in each planning area and for those moving in mid-year, and secure stability for all schools. Having several schools with a PAN over 30 pupils above the level of their local demand means some schools attract a few pupils from further away requiring more classes to be run, but

they are not economic, with a risk that if pupils join or leave, a class may need to be opened or closed. This disrupts education for all the pupils in the year group.

6.30. To balance school budgets, classes need to include 24 or more pupils. Schools with declining or volatile rolls face big changes in their annual budget, and consequent cuts in staff and risk financial deficit. The aim of PAN reductions is to match the operational level of schools to local demand and improve the focus of resources in each school on their pupils and reduce the risk of deficits. Meanwhile the physical capacity will remain available if demand rises, when it is possible to increase the PAN immediately, without consultation. It is considered prudent that in future PANs may be increased temporarily a year at a time, whilst parental demand is kept under review.

Housing development across the borough

6.31. At this stage it is unclear how much additional demand for school places will come from planned housing development. Our projections use data from the GLA (Greater London Authority) which make assumptions about the "child yield" from new developments, essentially the number of children that you might expect from the mix of proposed new housing.

6.32. In recent years and across most London boroughs these child yields have been considerably lower than anticipated. This may be in part related to the character of new properties, many of which are 1–2-bedroom apartments and which are not necessarily optimal for family living.

6.33. Further factors also include the affordability of larger housing in Haringey and across London and the additional impacts of Brexit and Covid-19, both of which have been linked to lower levels of demand for future school places as both factors have impacted birth rates across London and led to out-migration from Haringey and London.

6.34. Irrespective of whether new housing or some other dynamic creates additional demand for Reception places in future years the priority now is to ensure the sustainability and broad mix of all our primary schools. This will ensure their continued success today and ability to absorb of potential additional pupils in future years.

Fully collaborative process and self-review assessments

6.35. The proposal to reduce PANs at schools was undertaken as part of a fully collaborative process with key stakeholders and with two specific guidelines: a) that parental preference will not be undermined and b) that any school that reduces PAN will be able to immediately revert to their substantive PAN should local demand warrant it. The aim of this proposal is to help stabilise each school's intake and enable school leaders to plan and deliver school provision effectively to meet local demand.

6.36. Following the publication of the SPPR in June 2023, Haringey Officers convened to review the recent Greater London Authority (GLA) projections and current pupil population trends. It was recognised that reductions in PAN (both temporary and permanent) in recent years had gone some way to addressing our over-capacity, however, more needed to be done in this area especially since surplus of places in-year had also grown and financial pressures for schools had become more challenging.

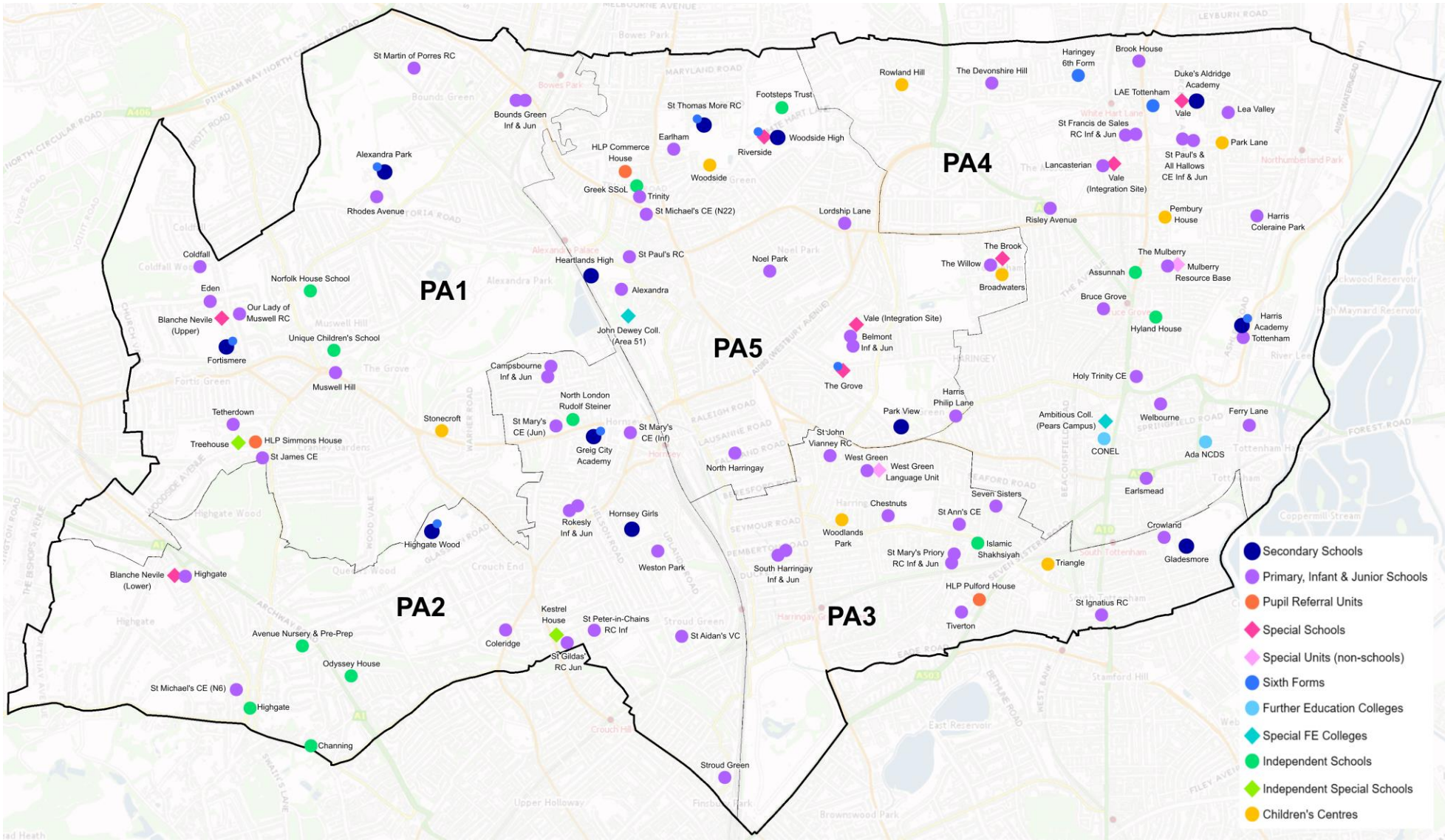
6.37. A series of local in-person workshops to discuss school place planning and Haringey's wider Education Strategy were held with school leaders and governors in September and October 2023 at all planning areas across the borough and in smaller geographical clusters to promote collaborative discussion between local schools. As part of our

strategic long-term planning, all clusters were asked to nominate 2 Headteachers from each cluster to become members of an Education Strategy Board chaired by the Director of Children Services.

6.38. The London Diocesan Board for Schools and Westminster Diocese were also contacted about the need to rationalise the number of school places available, and their contribution was noted during a number of meetings with the LA and schools.

6.39. A sustainability and resilience self-review questionnaire was shared with schools following the cluster meetings to help governing bodies build an accurate picture and analyse the context of their school. This tool is intended to assist schools in identifying any issues in future sustainability and to enable governing bodies and Trusts to work in partnership with the LA in a proactive and supportive way. This might lead to a discussion about next steps or exploration around collaboration and a suitable action plan.

Map of Haringey Planning Areas



7. Consultation

7.1. In accordance with paragraph 1.42 of the School Admissions Code (2021), a six-week consultation (24 November 2023- 05 January 2024) was carried out to invite anyone of interest to comment or object to the proposed admission arrangements for 2025/26.

7.2. A consultation document and questionnaire were used as the basis of informing stakeholders of the proposals to reduce the PAN at the primary schools mentioned in this report.

7.3. The purpose of the consultation was to ensure that all voices and views could be heard, enabling parents, schools, religious authorities, and the local community to comment about our proposed admission arrangements and proposals to reduce PANs.

7.4. To ensure as wide a consultation as possible, a range of modes and methods of communication were used to inform and facilitate feedback from stakeholders -

- through the bi-weekly (term-time only) Haringey Schools Newsletter which is distributed to the headteacher and chair of governors of all schools in the borough
- to all children's centres in the borough
- to all registered nurseries and child minders and any other early year's providers
- on the Council's online admissions pages
- individual school websites and noticeboards
- via information poster in all 9 libraries across the borough
- to all Councillors
- to both MPs with constituencies in Haringey
- to the diocesan authorities and any other religious bodies
- other groups, bodies, parents, and carers as appropriate

7.5. Stakeholders were given the opportunity to express their views in writing, via a questionnaire – both electronically and via the hard copy attached to the consultation document, by email and post.

Equality and Diversity Monitoring

7.6. As part of the consultation process, respondents were asked to complete an equality and diversity questionnaire, looking at Gender, Age, Ethnicity and Disability. The information collected will help identify any special requirements; promote equality; and improve choice and diversity. This information will only be retained and used for as long as is necessary. Where data is no longer required, it will be destroyed in line with relevant destruction policies and processes.

Consultation responses

7.7. The consultation closed with only 5 responses, and all were received via questionnaire or email. A detailed analysis of the responses can be found at Appendix 8.

7.8. As previously stated, consultation is carried out on our admission arrangements every year. We often use the annual consultation exercise to ask Headteachers, school staff, parent/carers and other stakeholders about proposed changes to school capacity or related admissions issues. Occasionally these additional elements elicit higher response rates as respondents are keen to articulate their views on an issue or proposal not recently debated. In years when no additional changes are proposed or the topics are ones with a familiar theme (such as falling rolls at primary schools across London) response rates to the survey are low. In some years we have only had several

responses, and this is the case for the most recently completed consultation on PAN reductions which is a familiar theme across many London boroughs.

Next steps

7.9. The Council's Cabinet is asked to determine the Council's admission arrangements for the academic year 2025/26 as set out in Appendices 1 – 4.

7.10. Council's Cabinet is recommended to agree the proposal to reduce the published admission number (PAN) for the 3 primary schools cited in this report. No serious issues or objections were raised in responses to the consultation. Council's Cabinet is therefore asked to agree the reductions, as they will support overall school improvement and effectiveness and financial and other stability.

7.11. In addition, Cabinet is recommended to agree Haringey's fair access protocol to come into force from 1 March 2024. The protocol ensures hard-to-place children are given a school place without delay and is a statutory requirement set out in the School Admissions Code 2021.

8. Contribution to the Corporate Delivery Plan 2022-2024 High level Strategic outcomes?

8.1. Ensuring we have a transparent and objective school admissions process with oversubscription criteria that is reasonable, clear, objective, and compliant with all relevant legislation, including equalities legislation, underpins Priority 1 in the Corporate Delivery Plan which seeks to enable every child to have the best start in life with access to high quality education. By reducing the PANs at some schools, the council will ensure that schools remain viable, standards are maintained and improved, and that parents and carers still have a choice of good or outstanding schools to choose from for their children.

8.2. Ensuring that we prioritise forms of school organisation that will remain financially viable under a range of different funding scenarios (i.e., organisational structures within and between schools that provide flexibility to address population change. Exploring creative and lasting solutions for school re-organisation, that minimise the risk of having to close schools in future and maintaining the current balance of provision across the borough that matches local need and strengthens local communities (including sufficient affordable SEND provision, balance of faith provision and LA/Academy Schools).

9. Carbon and Climate Outcome

9.1. Carbon and Climate Outcome is not applicable to this report.

10. Statutory Officers comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

10.1. Below are financial, governance and legal and equality comments.

Finance

10.2. The Director of Officer has been consulted in the production of this report and confirms that apart from a small administrative cost there are no direct financial implications as a result of the proposals. However, it will help reduce the financial pressure on these individual schools and the risk of these schools running into deficit.

10.3. Reducing PANs to match the demand would reduce school expenditure on staff not required to teach classes that are not required. This is particularly an issue where school accommodates a reception intake (or other year group) that is just over the PAN – for example, 35 pupils where a school has a PAN of 60. Due to infant class size regulations, the school would then need to employ 2 teachers for 2 classes of 17-18 pupils – the outlay on staff will remain the same as if the school had 30 in 5 each class, but the school would only receive 58% of the headcount funding. It is clearly in the interest of the authority to ensure that demand is as closely matched to supply as possible.

10.4. Reducing the PAN may mean fewer teachers are required by the schools, there is a risk that this could create redundancy costs in the short term, potentially the reduction could be met by not replacing staff.

10.5. Section 14 of the Education Act 1996 places a duty on local authorities to secure that there are sufficient primary and secondary school places in their area. There is a small risk that reducing school capacities could potentially leave the Council vulnerable to legal action for not meeting its target duty to provide sufficient primary school places, if we were in any danger of not being able to offer a “reasonable offer” to an applicant. However, the level of vacancies presently observed would mitigate against that risk.

Procurement

10.6. The Procurement team has been consulted in the production of this report and confirm there are no procurement implications as a result of the proposals.

Head of Legal & Governance

10.7. The Head of Legal and Governance (Monitoring Officer) has been consulted on the contents of this report and comments as follows: The current School Admissions Code ('the Code') came into force in September 2021 and was issued by the Department for Education under section 84 of the School Standards and Framework Act 1998. The Code is to be read alongside the School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) Regulations 2012 (‘the Regulations’’). In determining its admission arrangements for 2025-2026 the Council has a statutory duty as an admissions authority to act in accordance with the Regulations and with the relevant provisions of the Code. It must also as a result of its duty under section 149 of the Equality Act 2010 have due regard to the need to eliminate discrimination, harassment and victimisation and any other conduct which is prohibited by or under that Act, advance equality of opportunity, and foster good relations in relation to persons who share a relevant protected characteristic and persons who do not share it.

10.8. Paragraph 15 of the Code states that all schools must have admission arrangements that clearly set out how children will be admitted including the criteria that will be applied if there are more applications than places at the school. As part of determining its admission arrangements, the Council must set an admission number (called the Published Admission Number or PAN) for each school’s “relevant age group” i.e. the age group at which pupils are or will normally be admitted to the school.

10.9. School admission arrangements are determined by admission authorities. Generally, the admission authority for community and voluntary controlled schools is the local authority. Admission authorities must set ('determine') admission arrangements annually. Generally, where changes are proposed to admission arrangements, the admission authority must first publicly consult on those arrangements. If no changes are made to the admission arrangements, they must be consulted on at least once

every 7 years. Consultation must be for a minimum of 6 weeks and must take place between 1 October and 31 January of the school year before those arrangements are to apply (the determination year). Consultation must be undertaken when proposals are still at a formative stage. It must include sufficient reasons for particular proposals to allow those consulted to give intelligent consideration and an intelligent response, adequate time must be given for this purpose and the product of the consultation must be conscientiously taken into account when the ultimate decision is taken.

10.10. In relation to consultation the Council must consult with parents of children between the ages of two and eighteen; other persons in the relevant area who in the opinion of the admission authority have an interest in the proposed admissions; all other admission authorities within the relevant area; whichever of the governing body and the local authority who are not the admission authority; any adjoining neighbouring local authorities where the admission authority is the local authority and in the case of faith schools, the body or person representing the religion or religious denomination. The authority must also for the duration of the consultation publish a copy of the full proposed admission arrangements (including the PAN) on its website together with details to whom comments should be sent and the areas on which comments are not sought.

10.11. It is the responsibility of the authority to ensure that admission arrangements are compliant with the Code and relevant legislation. Arrangements mean overall procedures, practices, criteria and supplementary information to be used in deciding on the allocation of school places. In drawing up the arrangements, the authority must ensure that the practices and criteria used are reasonable, fair, clear and objective and comply with the relevant legislation including equalities legislation. Parents should be able to look at the set of arrangements and understand easily how places will be allocated. It is for the authority to decide which criteria would be the most suitable according to local circumstances.

10.12. Each year all local authorities must formulate and publish on their website a scheme by 1 January in the relevant determination year, a scheme to co-ordinate admission arrangements for the normal admissions round and late applications for all publicly funded schools within their area. All admission authorities must participate in co-ordination and provide the local authority with the information it needs to co-ordinate admissions by the dates agreed within the scheme. There is no requirement for local authorities to co-ordinate in-year applications, however, Haringey centrally co-ordinates for the vast majority of schools and has safeguarding protocols in place for tracking pupils admitted directly by some schools that administer their own in-year admissions.

10.13. The Code requires that the Council must have a Fair Access Protocol, agreed with the majority of schools in its area, to ensure that, outside the normal admissions round, unplaced children, especially the most vulnerable, are offered a place at a suitable school as quickly as possible. Cabinet Members will see the Proposed In-Year Fair Access Protocol at Appendix 5.

10.14. The proposed admission arrangements for 2025-2026, the proposed co-ordinated scheme, the proposed fair access protocol, and the consultation (that has been undertaken in accordance with the mandated period between 1 October to 31 January for a minimum of 6 weeks) on the proposed admission arrangements for 2025-2026 would appear to be in compliance with the Code and the Regulations.

10.15. In the event that some school posts are likely to become redundant as a result of a re-structure following reduction of PAN, schools should comply with their statutory duties e.g., under the Employment Rights Act 1996, Equality Act 2010, and any applicable guidance with a view to ensuring that the processes followed are lawful.

Equality

10.16. The Council has a public sector equality duty under the Equalities Act 2010 ('the 2010 Act') to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited by or under the Act. Advance equality of opportunity between people who share a "relevant protected characteristic" and people who do not share it;
- Foster good relations between people who share those a "relevant protected characteristic" and people who do not share it.
- A "relevant protected characteristic" is age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex (formerly gender) and sexual orientation.

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty. Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

10.17. The proposed admission arrangements set out in this report comply with the public sector equality duty and ensure that as an admission authority, the Council's arrangements do not directly or indirectly unfairly disadvantage an individual or group that possesses any of the characteristics defined in sections 4-12 of the 2010 Act.

10.18. An equalities impact assessment (EqIA) identified a disproportionate impact on the basis of gender - this proposal could adversely impact female teachers / female teaching assistants as several staff members at each school may be made redundant or re-deployed. This may be unavoidable as there is a greater concentration of females than males amongst teachers and teaching assistants in schools across Haringey and the country as a whole. To mitigate against any negative impact on staffing as a whole, the Council has ensured that the timing of the consultation allows schools sufficient time to review their staff structure, including allowing for natural wastage (staff voluntarily moving on), taking steps to redeploy staff to other departments/ schools, not renewing short-term contracts or reducing the use of agency staff.

10.19. As the reduction in PAN across the borough is being done to remove part of the surplus of school places, there will not be any disproportionate impact on children with protected characteristics.

10.20. This proposal does not impact the net capacity of schools (the number of pupils these school can accommodate) any increase in demand for local school place in future can be easily accommodated without even the need for a formal consultation i.e. reinstatement of PAN. Paragraph 3.6 of the Code provides the conditions upon which variations to PAN can take place. Admission authorities may propose other variations where they consider such changes to be necessary in view of a major change in circumstances. Such proposals must be referred to the Schools Adjudicator (for maintained schools) or the Secretary of State (for academies) for approval, and the appropriate bodies notified.

10.21. The proposed change is a reasonable and proportionate response to the issue of falling rolls across Haringey schools and will have wider positive benefits for the educational outcomes of Haringey's children and young people.

10.22. The publication of clear admission arrangements for all of our schools (a statutory requirement) ensures that admission to schools is a clear and transparent process and that parents and carers are able to select preferences for a school place with full knowledge of how admission to their local school(s) is determined.

11. Use of Appendices

11.1. The following appendices support this report:

Appendix 1 Nursery 2025
Appendix 2 Reception and Junior 2025
Appendix 3 Secondary Transfer 2025
Appendix 4 In-year admissions 2025
Appendix 5 Fair Access Protocol for Haringey schools
Appendix 6 Sixth Form 2025
Appendix 7 EqIA
Appendix 8 Consultation responses analysis

11.2. The full papers for this report can be viewed electronically on the Council's website at or in paper form at 5th Floor, 48 Station Road, Wood Green, London, N22 7TY.

12. Local Government (Access to Information) Act 1985

This report contains no exempt information.

Background

1. The Schools Standards and Framework Act 1998.
2. The Education Act 2002.
3. The Education and Inspections Act 2006.
4. Education and Skills Act 2008.
5. The School Admissions Code (September 2021)
6. School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) Regulations 2012
7. The School Admissions (Infant Class Sizes) (England) Regulations 2012.
8. The School Admissions (Appeals Arrangements) (England) Regulations 2012.
9. The Education Act 2011.
10. The School Admissions Appeals Code (2012).

Appendix 1

Determined Admission Criteria for Nursery in Haringey Community and VC Schools in September 2025

Children may have a part-time place in a nursery centre, or a class attached to a school in the September following their third birthday. If there are more requests than part-time places available, the admission rules (over-subscription criteria) explained below will be used to decide which children will be admitted. There is no right of appeal against the decision to refuse admission of children to nurseries.

Parents/carers should note that admission to a nursery class in a school does not guarantee a place in the reception class at the same school. Parent/carers must complete their home authority School Admissions Application Form, which will be available online, by 15 January in the academic year their child turns four.

Oversubscription criteria for part time places

When the school is oversubscribed, after the admission of pupils with an Education, Health and Care plan naming the school, priority for admission will be given to those children who meet the criteria set out below, in priority order:

1. Children Looked After

Children who are looked after by a local authority or were previously looked after but immediately after being looked after, became subject to an adoption, child arrangements, or special guardianship order, including those who appear to the admission authority to have been in state care outside of England and ceased to be in state care as a result of being adopted.

A looked after child is a child who is (a) in the care of a local authority, or (b) being provided with accommodation by a local authority in the exercise of their social services functions (see the definition in Section 22(1) of the Children Act 1989).

2. Social Medical

Children who the Authority accepts have an exceptional medical or social need for a place at one specific school. Applications will only be considered under this category if they are supported by a written statement from a doctor, social worker or other relevant independent professional. The information must confirm the exceptional medical or social need and demonstrate how the specified school is the only school that can meet the defined needs of the child.

3. Brother or Sister (sibling)

Children who will have a brother or sister attending the school (or its associated Infant or Junior school) at the time of admission. A sibling is a full brother or sister, a step/half brother or sister, a foster brother or sister or an adopted brother or sister living at the same address as the child for whom the application is being made.

4. Children of Staff

- Children of teaching staff of the school where the member of staff has been employed at the school for two or more years at the time of application, and/or
- Children of a member of staff who has been recruited to fill a vacancy for which there is a demonstrable skill shortage.

5. Distance

Children whose home address is closest to the preferred school.

Distance will be measured in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system.

Tie breakers

Children cannot be considered under more than one criterion. Within each criterion the sole tiebreaker to decide between two applications is children whose home address is closest to the school, measured in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system.

The tiebreaker for two or more applications whose home address is exactly the same distance from the school (and who are not from multiple births) will be random allocation using a computerised system. The random allocation process will be supervised by an independent body.

Multiple births

If only one place is available at the school and the next child(ren) who qualifies for a place is one of multiple birth, we will ask community schools to go over their published admission number.

Notes

(i) Home address is defined as the child's only or main residence. A business address, a childminder's address or any address including a family member's address other than the child's only or main residence will not be accepted.

(ii) If parents are separated, the application should be made by the parent the child normally lives with. Where a child spends equal time during the school week with each parent, the exact arrangements must be made clear in a letter with a copy of any child arrangements order submitted with the application. It is the parents' responsibility to agree between themselves and make clear which address will be used and to provide supporting evidence in respect of that address. An application can only be processed from one address. The final decision about which address is to be used rests with Haringey Council.

(iii) Previously looked after children include those children who appear (to the admission authority) to have been in state care outside of England and ceased to be in state care as a result of being adopted. A child is regarded as having been in state care outside of England if they were in the care of or were accommodated by a public authority, a religious organisation, or any other provider of care whose sole or main purpose is to benefit society.

(iv) A sibling is a full brother or sister, a step/half brother or sister, a foster brother or sister or an adopted brother or sister living at the same address as the child for whom the application is being made.

(v) Priority for children of teaching staff will be limited to one place for each form of entry in any year. Exception to this will apply to children of multiple birth or those born in the same academic year. All such applications must be submitted to the local authority and must be accompanied with the relevant paperwork supporting an application on these grounds. The applicant must take sole responsibility to provide such paperwork. Without the provision of the relevant papers, priority will not be given on these grounds.

(vi) Haringey measures distance in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system. Measurements by alternative systems or to other points will not be taken into account in any circumstances. Where applicants have identical distance measurements, priority amongst them will be determined at random using a computerised system.

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Appendix 2

Determined Admission Arrangements for Reception and Junior Transfer Admissions to Haringey Community and VC Schools in September 2025

Oversubscription criteria

When the school is oversubscribed, after the admission of pupils with an Education, Health and Care plan naming the school, priority for admission will be given to those children who meet the criteria set out below, in priority order:

1. **Children Looked After**

Children who are looked after by a local authority or were previously looked after but immediately after being looked after, became subject to an adoption, child arrangements, or special guardianship order, including those who appear to the admission authority to have been in state care outside of England and ceased to be in state care as a result of being adopted.

A looked after child is a child who is (a) in the care of a local authority, or (b) being provided with accommodation by a local authority in the exercise of their social services functions (see the definition in Section 22(1) of the Children Act 1989).

2. **Social Medical**

Children who the Authority accepts have an exceptional medical or social need for a place at one specific school. Applications will only be considered under this category if they are supported by a written statement from a doctor, social worker or other relevant independent professional. The information must confirm the exceptional medical or social need and demonstrate how the specified school is the only school that can meet the defined needs of the child.

3. **Linked School**

This rule applies only to junior school admissions. Applicants attending an infant school will be prioritised under this rule for admission to the linked junior school. The Linked infant and junior schools in Haringey normally share the same names (e.g. Rokesly Infant School is linked to Rokesly Junior School) with the exception of St Peter-in-Chains Infant School and St Gildas' Junior School.

4. **Brother or Sister (sibling)**

Children with a brother or sister already attending the school or linked infant/junior school and who will still be attending on the date of admission.

If a place is obtained for an older child using fraudulent information, there will be no sibling connection available to subsequent children from that family.

5. Children of Staff

- Children of teaching staff of the school where the member of staff has been employed at the school for two or more years at the time of application, and/or
- Children of a member of staff who has been recruited to fill a vacancy for which there is a demonstrable skill shortage.

6. Distance

Children whose home address is closest to the preferred school.

Distance will be measured in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system.

Tiebreakers

Children cannot be considered under more than one criterion. Within each criterion the sole tiebreaker to decide between two applications is children whose home address is closest to the school, measured in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system.

The tiebreaker for two or more applications whose home address is exactly the same distance from the school (and who are not from multiple births) will be random allocation using a computerised system. The random allocation process will be supervised by an independent body.

Multiple births

If only one place is available at the school and the next child(ren) who qualifies for a place is one of multiple birth, we will ask community schools to go over their published admission number.

Notes

(i) Home address is defined as the child's only or main residence. A business address, a childminder's address or any address including a family member's address other than the child's only or main residence will not be accepted.

(ii) If parents are separated, the application should be made by the parent the child normally lives with. Where a child spends equal time during the school week with each parent, the exact arrangements must be made clear in a letter with a copy of any child arrangements order submitted with the application. It is the parents' responsibility to agree between themselves and make clear which address will be used and to provide supporting evidence in respect of that address. An application can only be processed from one address. The final decision about which address is to be used rests with Haringey Council.

(iii) Previously looked after children include those children who appear (to the admission authority) to have been in state care outside of England and ceased to be in state care as a result of being adopted. A child is regarded as having been in state care outside of England if they were in the care of or were accommodated by a public authority, a religious organisation, or any other provider of care whose sole or main purpose is to benefit society.

(iv) A sibling is a full brother or sister, a step/half brother or sister, a foster brother or sister or an adopted brother or sister living at the same address as the child for whom the application is being made.

(v) Priority for children of teaching staff will be limited to one place for each form of entry in any year. Exception to this will apply to children of multiple birth or those born in the same academic year. All such applications must be submitted to the local authority and must be accompanied with the relevant paperwork supporting an application on these grounds. The applicant must take sole responsibility to provide such paperwork. Without the provision of the relevant papers, priority will not be given on these grounds.

(vi) Haringey measures distance in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system. Measurements by alternative systems or to other points will not be taken into account in any circumstances. Where applicants have identical distance measurements, priority amongst them will be determined at random using a computerised system.

Waiting lists

Where a child does not receive an offer of their preferred school, parents can request that their name is placed on the waiting list for that school. Waiting lists are ordered, and places allocated as they become available, strictly in accordance with the school's admissions criteria.

Waiting list positions can change at any time and a child's position may go down as well as up if other applicants with higher priority join the waiting list. Being on the waiting list does not guarantee a place in the school.

Waiting lists are maintained throughout the year and are refreshed on an annual basis at the end of the summer term. At this time parents will be contacted to confirm if they wish for their child to remain on the waiting list.

Nursery and Infant Pupils

Admission to a nursery class in a school does not guarantee a place in the reception class at the same school. Similarly, admission to an infant school does not guarantee a place in the linked junior school.

All parents/carers must complete their home authority School Admissions Application Form for admission to reception or to junior school (where applicable) by 15 January in the academic year their child turns four (reception) or seven (junior).

Deferred entry before compulsory school age

Children will normally be admitted to the reception year in the September following their fourth birthday. In line with the School Admissions Code September 2021, parents can defer their child's entry to the reception year until later in the school year, where they have been offered a place at a school to start before they are of compulsory school age.

Where entry is deferred, the school will hold the place for that child and not offer it to another child. However, entry cannot be deferred beyond the point the child reaches compulsory school age nor beyond the beginning of the final term of the Reception Year.

Where the parents wish, children may attend part-time until later in the school year but not beyond the point at which they reach compulsory school age.

Summer born children

Paragraph 2.18 of the School Admissions Code, September 2021, states that the parents of a summer born child may choose not to send that child to school until the September following their fifth birthday. Where this is the case the school will hold the place for that child and not offer it to another child. However, the school place cannot be held beyond the beginning of the final term of the Reception Year.

The parents of a summer born child may request that they are admitted out of their normal age group – to reception rather than year 1. Details of the process of making such requests are provided below.

Requests for children to be educated outside their chronological age group
(For both summer born and non-summer born children)

Where families request that their child is educated outside their chronological age group the Council, as the admission authority for Haringey community and voluntary controlled (VC) schools, will make a decision on the basis of the circumstances of the case and in the best interests of the child concerned. This will include taking account of the child's individual needs and abilities and to consider whether these can best be met in their chronological year or a different year group. It will also involve taking account of:

- the parents' views
- information about the child's academic, social and emotional development
- where relevant their medical history and the views of a medical professional
- whether they have previously been educated out of their normal age group
- whether they may naturally have fallen into a lower age group if it were not for being born prematurely, and
- where relevant, the potential impact on the child of being admitted to their chronological year group without first having completed the preceding year.

The views of the headteacher will be an important part of this consideration.

Parents should write to the Council giving reasons for their request. This should be accompanied by an application for the child's actual year group. The application will be processed, and a school place will be secured in the child's actual year group. This place can later be withdrawn if the request for delayed admission is approved. Parents who are granted their request must then make a fresh application for a place in the agreed year group on a paper/pdf form. This application will be considered in accordance with the school's oversubscription criteria in the event of oversubscription. The decision will be reviewed once the child has started school at intervals agreed by the family and the school.

Requests will be considered by a panel of Haringey officers during the summer term before the September in which the child will be admitted to his or her correct age group. This panel will meet following the primary National Offer Day. For late or in-year requests the panel will meet to consider applications regularly throughout the school year. If parents would like to make an application for an own admission authority school, they will need approach the relevant school with their request.

Parents have a statutory right to appeal against the refusal of a place at a school for which they have applied. This right does not apply if they are offered a place at the school but it is not in their preferred age group.

Published Admission Numbers (PAN)

The proposed published admission numbers for Haringey community and voluntary controlled (VC) primary schools for entry in September 2024 are as follows:

School	Admission number
Alexandra	60
Belmont Infant	60
Bounds Green	90
Bruce Grove	30
Campsbourne Infant	60
Coldfall	90
Coleridge	120
Crowland	60
The Devonshire Hill	60
Earlham	30
Earlsmead	60
Ferry Lane	30
Highgate	60
Lancasterian	60
Lea Valley	60
Lordship Lane	60

School	Admission number
The Mulberry	60
Muswell Hill	60
Rhodes Avenue	90
Risley Avenue	60
Rokesly Infant	90
St Aidan's VC	30
Seven Sisters	30
South Harringay Infant	60
Stroud Green	60
Tetherdown	60
Tiverton	30
Welbourne	60
West Green	30
Weston Park	30
The Willow	60

The published admission numbers for the following voluntary aided (VA) schools which are their own admissions authority, for entry in September 2025 are as follows:

School	Admission number
St Francis de Sales Catholic Junior School	60
St Mary's Priory Catholic Junior School	30
St Ignatius RC Primary School	30

Appendix 3

Determined Admission Arrangements for Secondary Transfer Admissions to Haringey Community Schools in September 2025

Oversubscription criteria

When the school is oversubscribed, after the admission of pupils with an Education, Health and Care Plan naming the school, priority for admission will be given to those children who meet the criteria set out below, in priority order:

1. **Children Looked After**

Children who are looked after by a local authority or were previously looked after but immediately after being looked after, became subject to an adoption, child arrangements, or special guardianship order, including those who appear to the admission authority to have been in state care outside of England and ceased to be in state care as a result of being adopted.

A looked after child is a child who is (a) in the care of a local authority, or (b) being provided with accommodation by a local authority in the exercise of their social services functions (see the definition in Section 22(1) of the Children Act 1989).

2. **Social Medical**

Children who the Authority accepts have an exceptional medical or social need for a place at one specific school. Applications will only be considered under this category if they are supported by a written statement from a doctor, social worker or other relevant independent professional. The information must confirm the exceptional medical or social need and demonstrate how the specified school is the only school that can meet the defined needs of the child.

3. **Brother or Sister (sibling)**

Children with a brother or sister already attending the school and who will still be attending in years 7-11 on the date of admission.

If a place is obtained for an older child using fraudulent information, there will be no sibling connection available to subsequent children from that family.

4. **Children of staff**

- Children of teaching staff of the school where the member of staff has been employed at the school for two or more years at the time of application, and/or
- Children of a member of staff who has been recruited to fill a vacancy for which there is a demonstrable skill shortage.

5. Distance

Children whose home address is closest to the preferred school.

Distance will be measured in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system.

Tie breakers

Children cannot be considered under more than one criterion. Within each criterion the sole tiebreaker to decide between two applications is children whose home address is closest to the school, measured in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system.

The tiebreaker for two or more applications whose home address is exactly the same distance from the school (and who are not from multiple births) will be random allocation using a computerised system. The random allocation process will be supervised by an independent body.

Multiple births

If only one place is available at the school and the next child(ren) who qualifies for a place is one of multiple birth, we will ask community schools to go over their published admission number.

Notes

(i) Home address is defined as the child's only or main residence. A business address, a childminder's address or any address including a family member's address other than the child's only or main residence will not be accepted.

(ii) If parents are separated, the application should be made by the parent the child normally lives with. Where a child spends equal time during the school week with each parent, the exact arrangements must be made clear in a letter with a copy of any custody or residency order submitted with the application. It is the parents' responsibility to agree between themselves and make clear which address will be used and to provide supporting evidence in respect of that address. An application can only be processed from one address. The final decision about which address is to be used rests with Haringey Council.

(iii) Previously looked after children include those children who appear (to the admission authority) to have been in state care outside of England and ceased to be in state care as a result of being adopted. A child is regarded as having been in state care outside of England if they were in the care of or were accommodated by a public authority, a religious organisation, or any other provider of care whose sole or main purpose is to benefit society.

(iv) A sibling is a full brother or sister, a step/half brother or sister, a foster brother or sister or an adopted brother or sister living at the same address as the child for whom the application is being made.

(v) Priority for children of teaching staff will be limited to one place for each form of entry in any year. Exception to this will apply to children of multiple birth or those born in the same academic year. All such applications must be submitted to the local authority and must be accompanied with the relevant paperwork supporting an application on these grounds. The applicant must take sole responsibility to provide such paperwork. Without the provision of the relevant papers, priority will not be given on these grounds.

(vi) Haringey measures distance in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system. Measurements by alternative systems or to other points will not be taken into account in any circumstances. Where applicants have identical distance measurements, priority amongst them will be determined at random using a computerised system.

Waiting lists

Where a child does not receive an offer of their preferred school, parents can request that their name is placed on the waiting list for that school. Waiting lists are ordered, and places allocated as they become available, strictly in accordance with the school's admissions criteria.

Waiting list positions can change at any time and a child's position may go down as well as up if other applicants with higher priority join the waiting list. Being on the waiting list does not guarantee a place in the school.

Waiting lists are maintained throughout the year and are refreshed on an annual basis at the end of the summer term. At this time parents will be contacted to confirm if they wish for their child to remain on the waiting list.

Requests for children to be educated outside their chronological age group

Where families request that their child is educated outside their chronological age group the Council, as the admission authority for Haringey community and voluntary controlled (VC) schools, will make a decision on the basis of the circumstances of the case and in the best interests of the child concerned. This will include taking account of the child's individual needs and abilities and to consider whether these can best be met in their chronological year or a different year group. It will also involve taking account of:

- the parents' views
- information about the child's academic, social and emotional development
- where relevant their medical history and the views of a medical professional
- whether they have previously been educated out of their normal age group

- whether they may naturally have fallen into a lower age group if it were not for being born prematurely, and
- where relevant, the potential impact on the child of being admitted to their chronological year group without first having completed the preceding year.

The views of the headteacher will be an important part of this consideration.

Parents should write to the Council giving reasons for their request. This should be accompanied by an application for the child's actual year group. The application will be processed, and a school place secured in the child's actual year group.
This place can later be withdrawn if the request for delayed admission is approved. Parents who are granted their request must then make a fresh application for a place in the agreed year group on a paper/pdf form. This application will be considered in accordance with the school's oversubscription criteria in the event of oversubscription. The decision will be reviewed once the child has started school at intervals agreed by the family and the school.

Requests will be considered by a panel of Haringey officers during the summer term before the September in which the child will be admitted to his or her correct age group. This panel will meet following the secondary National Offer Day. For late or in-year requests the panel will meet to consider applications regularly throughout the school year. If parents would like to make an application for an own admission authority school, they will need approach the relevant school with their request.

Parents have a statutory right to appeal against the refusal of a place at a school for which they have applied. This right does not apply if they are offered a place at the school but it is not in their preferred age group.

Determined Admission Arrangements for Hornsey School for Girls for 2025

Oversubscription criteria

When the school is oversubscribed, after the admission of pupils with an Education, Health and Care plan naming the school, priority for admission will be given to those children who meet the criteria set out below, in priority order:

1. **Children Looked After**

Girls who are looked after by a local authority or were previously looked after but immediately after being looked after, became subject to an adoption, child arrangements, or special guardianship order, including those who appear to the admission authority to have been in state care outside of England and ceased to be in state care as a result of being adopted.

A looked after child is a child who is (a) in the care of a local authority, or (b) being provided with accommodation by a local authority in the exercise of their social services functions (see the definition in Section 22(1) of the Children Act 1989).

2. **Social Medical**

Girls who the Authority accepts have an exceptional medical or social need for a place at one specific school. Applications will only be considered under this category if they are supported by a written statement from a doctor, social worker or other relevant independent professional. The information must confirm the exceptional medical or social need and demonstrate how the specified school is the only school that can meet the defined needs of the child.

3. **Siblings**

Girls with a sister already attending the school and who will still be attending in years 7-11 on the date of admission. A sibling is a full sister, a step sister, a foster sister or an adopted sister living at the same address as the girl for whom the application is being made.

If a place is obtained for an older child using fraudulent information, there will be no sibling connection available to subsequent children from that family.

4. **Children of staff**

- Daughters of teaching staff of the school where the member of staff has been employed at the school for two or more years at the time of application, and/or
- Daughters of a member of staff who has been recruited to fill a vacancy for which there is a demonstrable skill shortage.

5. **Distance**

Girls whose home address is closest to the school.

Distance will be measured in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system.

Tie breakers

Children cannot be considered under more than one criterion. Within each criterion the sole tiebreaker to decide between two applications is children whose home address is closest to the school, measured in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system.

The tiebreaker for two or more applications whose home address is exactly the same distance from the school (and who are not from multiple births) will be random allocation using a computerised system. The random allocation process will be supervised by an independent body.

Multiple births

If only one place is available at the school and the next girl(s) who qualifies for a place is one of multiple birth, we will ask community schools to go over their published admission number.

Notes

(i) Home address is defined as the child's only or main residence. A business address, a childminder's address or any address including a family member's address other than the child's only or main residence will not be accepted.

(ii) If parents are separated, the application should be made by the parent the child normally lives with. Where a child spends equal time during the school week with each parent, the exact arrangements must be made clear in a letter with a copy of any custody or residency order submitted with the application. It is the parents' responsibility to agree between themselves and make clear which address will be used and to provide supporting evidence in respect of that address. An application can only be processed from one address. The final decision about which address is to be used rests with Haringey Council.

(iii) Previously looked after children include those children who appear (to the admission authority) to have been in state care outside of England and ceased to be in state care as a result of being adopted. A child is regarded as having been in state care outside of England if they were in the care of or were accommodated by a public authority, a religious organisation, or any other provider of care whose sole or main purpose is to benefit society.

(iv) A sibling is a full brother or sister, a step/half brother or sister, a foster brother or sister or an adopted brother or sister living at the same address as the child for whom the application is being made.

(v) Priority for children of teaching staff will be limited to one place for each form of entry in any year. Exception to this will apply to children of multiple birth or those born in the same academic year. All such applications must be submitted to the local authority and must be accompanied with the relevant paperwork supporting an application on these grounds. The applicant must take sole responsibility to provide such paperwork. Without the provision of the relevant papers, priority will not be given on these grounds.

(vi) Haringey measures distance in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system. Measurements by alternative systems or to other points will not be taken into account in any circumstances. Where applicants have identical distance measurements, priority amongst them will be determined at random using a computerised system.

Waiting lists

Where a child does not receive an offer of their preferred school, parents can request that their name is placed on the waiting list for that school. Waiting lists are ordered, and places allocated as they become available, strictly in accordance with the school's admissions criteria.

Waiting list positions can change at any time and a child's position may go down as well as up if other applicants with higher priority join the waiting list. Being on the waiting list does not guarantee a place in the school.

Waiting lists are maintained throughout the year and are refreshed on an annual basis at the end of the summer term. At this time parents will be contacted to confirm if they wish for their child to remain on the waiting list.

Requests for children to be educated outside their chronological age group

Where families request that their child is educated outside their chronological age group the Council, as the admission authority for Hornsey School for Girls, will make a decision on the basis of the circumstances of the case and in the best interests of the child concerned. This will include taking account of the child's individual needs and abilities and to consider whether these can best be met in their chronological year or a different year group. It will also involve taking account of:

- the parents' views
- information about the child's academic, social and emotional development
- where relevant their medical history and the views of a medical professional
- whether they have previously been educated out of their normal age group
- whether they may naturally have fallen into a lower age group if it were not for being born prematurely, and
- where relevant, the potential impact on the child of being admitted to their chronological year group without first having completed the preceding year.

The views of the headteacher will be an important part of this consideration.

Parents should write to the Council giving reasons for their request. This should be accompanied by an application for the child's actual year group. The application will be processed, and a school place secured in the child's actual year group.
This place can later be withdrawn if the request for delayed admission is approved. Parents who are granted their request must then make a fresh application for a place in the agreed year group on a paper/pdf form. This application will be considered in accordance with the school's oversubscription criteria in the event of oversubscription. The decision will be reviewed once the child has started school at intervals agreed by the family and the school.

Requests will be considered by a panel of Haringey officers during the summer term before the September in which the child will be admitted to his or her correct age group. This panel will meet following the secondary National Offer Day. For late or in-year requests the panel will meet to consider applications regularly throughout the school year. If parents would like to make an application for an own admission authority school, they will need approach the relevant school with their request.

Parents have a statutory right to appeal against the refusal of a place at a school for which they have applied. This right does not apply if they are offered a place at the school, but it is not in their preferred age group.

Published Admission Number (PAN)

The admission number for Haringey community schools for entry in September 2025 is as follows:

School	Admission number
Gladesmore Community School	243
Highgate Wood School	243
Hornsey School for Girls	162
Park View School	216

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Appendix 4

Determined Admission Arrangements for In-Year Admissions to Haringey Community and VC Schools 2025-26

Oversubscription criteria

Primary, Infant and Junior community and voluntary controlled (VC) schools

- The criteria set out in **Appendix 2** will be applied.

Secondary community schools

- The criteria set out in **Appendix 3** will be applied.

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Appendix 5

Fair Access Protocol for Haringey Schools from March 2024-25

Introduction

1. The School Admissions Code, September 2021, ('the Code') requires local authorities to have in place a fair access protocol which all local schools and Academies must adhere to.

2. Its aims are to:

- acknowledge the real needs of vulnerable young people who are not on the roll of a school and to ensure that an appropriate placement is identified quickly and pupils are on roll within 15 days of the panel
- seek to find an alternative placement or support for those on roll of a school where it can be demonstrated that they are at risk of permanent exclusion
- fairly share the admission of vulnerable students across all schools and Academies (where the panel agree that another mainstream school place should be identified)
- arrange such admissions openly through a process which has the confidence of all
- record the progress and successes of the young people placed through this panel

This protocol reflects the LA's responsibility for safeguarding and promoting the welfare of children and young people as well as educational attainment

3. It is essential to the success of fair access that all headteachers and governing bodies agree to the aims, principles and procedures and give their fullest support.

4. All schools recognise their collective responsibility for all pupils and accountability for some and will work collaboratively to manage pupils with challenging behaviour, involving multi-agency support, accessed where appropriate. All members will work together to secure commitment to the inclusion agenda and to reduce exclusions from schools.

Students within the scope of this scheme

5. The admission to school of the following students falls within the scope of this scheme:

a. children either subject to a Child in Need Plan or a Child Protection Plan[1] or having had a Child in Need Plan or a Child Protection Plan within 12 months at the point of being referred to the fair access panel ;

b. children living in a refuge or in other Relevant Accommodation at the point of being referred to the fair access panel;

c. children from the criminal justice system

d. children in alternative provision who need to be reintegrated into mainstream education or who have been permanently excluded but are deemed suitable for mainstream education;

e. children with special educational needs (but without an education, health and care plan), disabilities or medical conditions;

f. children who are carers;

g. children who are homeless;

h. children in formal kinship care arrangements[2]

i. children of, or who are, Gypsies, Roma, Travelers, refugees and asylum seekers;

j. children who have been refused a school place on the grounds of their challenging behaviour and referred to the FAP in accordance with paragraph 3.10 of the Code;

k. children for whom a place has not been sought due to exceptional circumstances;[3]

l. children who have been out of education for 4 or more weeks where it can be demonstrated that there are no places available at any school within a reasonable distance of their home. This does not include circumstances where a suitable place has been offered to a child and this has not been accepted; and

m. previously looked after children for whom the local authority has been unable to promptly secure a school place.[4]

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[1] Child in Need Plans and Child Protection Plans are plans of help and protection to address safeguarding and welfare needs, where a child has been assessed by the local authority as being a child in need under Section 17 of the Children Act 1989 and/or as suffering or likely to suffer significant hardship under Section 47 of the Children Act 1989. See also statutory guidance Working Together to Safeguard Children (2018) (pages 35 and 48 to 49). Where a local authority is advised that a child who has moved into the local authority had a Child in Need Plan or Child Protection Plan previously and meets the criteria outlined, this information may need to be checked with the previous local authority

[2] As evidenced by either a child arrangements order not relating to either birth parent or a special guardianship order. the FAP on this basis, based on the circumstances of the case.

[3] It is for the local authority to decide whether a child qualifies to be placed via the FAP on this basis, based on the circumstances of the case.

Managed moves & EHCPs

6. The fair access panel does not administer the process for managed moves, however, schools may use it as a forum to discuss and liaise with other education providers regarding possible managed moves.

7. Outside the panel, all schools must inform the School Admissions and Organisation Service of any pupil who they are going to refer for a managed move, so an accurate record of school attendance and managed moves currently in progress can be maintained by the local authority. Schools must also inform the School Admissions and Organisation Service of the outcome of a managed move, i.e. when a pupil moves permanently to their new school or that it is determined that they should remain at their original school.

8. There are dedicated arrangements for children with Education, Health and Care plans and this protocol does not override those arrangements. However, it has been agreed that pupils who are placed through those arrangements will be noted by the fair access panel (see later section).

Composition and frequency of the panel

Secondary

9. A panel, consisting of a minimum of 3 secondary Headteachers (or their designated representative), will meet once a month (or as necessary) to ensure prompt and fair allocation of young people to schools. Heads will be notified of their designated meetings at the beginning of the academic year.

10. The Head of Education Services or another designated local authority Officer will chair the panel.

11. In the event that the placement decision is not unanimous, the designated Headteachers will decide by a majority vote

12. Where a young person is known to a particular service or agency, an officer with knowledge of that young person will be invited to the panel, or a short written statement may be submitted.

13. The membership of the panel can include as necessary, a representative of children's social care, educational psychology service, youth offending service, children missing education, children in care, the police and any other relevant professional supporting a case.

Primary

14. A panel, consisting of no less than three primary Headteachers (or their designated representative), will meet once a half term, (or as necessary) to ensure prompt and fair allocation of young people to schools.

15. The Head of Education Services or another designated local authority officer will chair the panel.

16. Where a young person is known to a particular service or agency, an officer with knowledge of that young person will be invited to the panel, or a short-written statement may be submitted.

The decision-making process

17. Cases will be brought to the panel by the Haringey Admissions Service which will be the point of referral. The cases must be submitted under one of the categories given in paragraph 5 above and the child must be without a school place.

18. The Panel will be administered by the Haringey Admissions Service which will provide data for the current and previous school year (figures to be based on actual figures where fair access pupils have been admitted).

19. The following data will be provided at each panel:

- The number of pupils on roll at each school in each year group
- The number of vacancies at each school in each year group
- The number of pupils that have been admitted to each school in each year group through the 'normal' in year admissions process since the last panel
- The number of pupils that have been admitted to each school in each year group through the fair access admissions process since the last panel
- The total number of pupils that have been admitted to each school in each year group through the fair access admissions process in the last academic year and the number of schools or Academies (if any) that have failed to admit
- Background/ pupil history/ information, where available and where consent has been confirmed
- The number of students with statements of Special Educational Need allocated over number through the SEN procedures.

20. The placement panel for children in care will continue to determine the most appropriate placement for each young person and their case will be presented for the panel to ratify. In order to ensure that CIC are admitted to school quickly, they will be placed before the panel and it will not be possible for these cases to be brought back to the panel for reconsideration.

21. When making the decision as to appropriate school placement for the child, the panel will take into account:

- preferences made and views of parents/carers and the view of the pupil (including religious affiliation)

- the admissions criteria
- the published admission number and number of forms, of entry so placements can be made proportional to the number of forms of entry
- the number of students admitted through the fair access panel in the previous and current academic year
- the needs of the student, where this is known
- any capacity/capability reasons why the school may not be able to respond to the needs of the student
- the individual context of a school in relation to recently excluded students
- whether the applicant has previously attended a Haringey school.
- it will be the presumption that wherever possible pupils will return to a school if they have previously been on roll there.

22. In addition to the factors above each child will be allocated a set number of points under the below system, based on the likely complexity of support which the admitting school will need to put in place. The combined points of the children admitted to each school via fair access will be monitored, and when considering the equitable allocation of children the panel will take into account the proportion of complex cases which each school has already admitted.

Fair Access Points System	
Weighting	**Case Factors**
3 points	Permanent exclusion and/or Youth Offending Service involvement
2 points	More than one fixed term exclusion, a managed move, or other significant concerns (as agreed by panel)
1 point	All other allocations

23. In cases where a child does not return to their previous Haringey school, that school will have the value of one child debited from their comparative fair access statistics, to reflect the loss of that child from the school's roll.

- This debit will apply regardless of whether the child was originally admitted to that school via the fair access protocol.
- In cases where the child is being re-integrated into mainstream school from an alternative provision, and the child was previously permanently excluded or it is otherwise considered to be in the best interests of the child not to return to their previous school, this debit will not be applied.

- In cases where the child previously attended more than one Haringey school the debit will be applied solely to the school which the child most recently attended.

24. **Note:** Where a school has admitted pupils above its admission number in error, these additional pupils will not count and cannot be offset against fair access referrals.

25. Where an alternative educational placement is determined most suitable to meet the needs of a young person, this provision will be identified in principle by the Inclusion Service, following assessment, and ratified by the panel.

26. Decisions will be reached by consensus, whenever possible, with the chair mandated to take appropriate action where this has not proved possible.

Implementation of the decisions

27. Decisions regarding placement of students under the fair access protocol will be made by the panel, and will be final.

28. Admission must take place within **15** school days of the school receiving notification of the decision.

29. In exceptional circumstances, the allocated school may request that the panel reconsider their decision at the next meeting. This will only be possible where the school has prior knowledge of the specific young person which was not known to the panel at the time of decision, which makes the placement inappropriate. This request must be made in writing to the Chair within **5** school days of the school receiving notification of the decision. The formal offer letter will be sent on the 6th day.

30. The Department for Education recognises that admission of a young person via fair access could potentially take the school above the planned admission number for that year group.

31. It is recognised that there is usually little available information about the young people who are being admitted in-year to school. The School Admissions and Organisation Service will try to acquire as much educational information as practical to accompany in-year admissions to assist smooth integration to the school.

Risk assessments

32. Risk assessments will be undertaken as necessary by the referring body.

Relationship with appeals

33. Where young people are admitted to a school above the planned admission number in any year group under the protocol, this should not prejudice the provision of efficient education or the efficient use of resources of the school.

34. Appeal panels will be made aware of the conditions of the scheme, and that the admission of an additional student under this scheme is different from a school voluntarily exceeding its admission limit. Panels will also be made aware that any

decision made to allow appeals will place further pressure on the school's resources.

35. A school placement made through the FAP shall not remove a parent/carer's right to appeal for a school place elsewhere.

Monitoring the operation of the Protocol

36. The School Admissions and Organisation Service will undertake scheduled checks and monitor admission dates and pupil days.

37. The anonymised details of all decisions will be made available to the Director and Lead Member to demonstrate that the Protocol is being effective.

38. This will include any school or Academy that has not taken a pupil on roll within 15 days of the decision being notified.

39. Details of any school or Academy who has not taken a pupil on roll within 15 days of the decision will also be available at the next fair access meeting.

40. On the 16th day the Head of Education Services will contact in writing the Headteacher of any school or Academy that has failed to admit within the agreed timeframe to request an on-roll date.

41. If the school or Academy fails to provide an on-roll date, within agreed timescales, then the direction process will apply as set out in the School Admissions Code and in accordance to the Department for Education advice: "Fair Access Protocols Guidance for school leaders, admission authorities and local authorities" August 2021.

42. The protocol will be reviewed on an annual basis by the Local Authority, in conjunction with Headteachers/ principals, in order to assess its effectiveness in ensuring that unplaced children are being allocated places at schools/ academies or in alternative educational provision on an equitable basis.

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Appendix 6

Determined Admission Arrangements for Sixth Form Admissions to Haringey Community Schools in September 2025

Highgate Wood Secondary School

Maximum number of students to be admitted from outside the school = 30%

All students will be invited to an informal discussion about their subject choice. The general entry requirements are as follows:

A Level

At least five GCSE passes at 9 – 5, with specific requirements for particular subjects based upon the national statistical guidance for successful outcomes. We consider ourselves to be an open access Sixth Form and so the criteria are matched to what is required to ensure positive outcomes. Full details for different subjects are available on the website.

Oversubscription criteria

Where the number of eligible external applicants for a course of study exceeds the places available then admission will be determined in accordance with the following priority of admission criteria:

1. **EHCP**

Students who have an Education Health and Care Plan naming the school.

2. **Children Looked After**

Students who are looked after by a local authority or were previously looked after but immediately after being looked after, became subject to an adoption, child arrangements, or special guardianship order, including those who appear to the admission authority to have been in state care outside of England and ceased to be in state care as a result of being adopted.

A looked after child is a child who is (a) in the care of a local authority, or (b) being provided with accommodation by a local authority in the exercise of their social services functions (see the definition in Section 22(1) of the Children Act 1989).

3. **Brother or Sister (sibling)**

Students who will have a sibling attending the school at the point of admission.

4. **Distance**

Students whose home address is closest to the preferred school.

Distance will be measured in a straight line from the Ordnance Survey address point of the student's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system.

Tie breakers

Students cannot be considered under more than one criterion. Within each criterion the sole tiebreaker to decide between two applications is students whose home address is closest to the school, measured in a straight line from the Ordnance Survey address point of the student's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system.

The tiebreaker for two or more applications whose home address is exactly the same distance from the school (and who are not from multiple births) will be random allocation using a computerised system. The random allocation process will be supervised by an independent body.

Notes

(i) Home address is defined as the student's only or main residence. A business address, a childminder's address or any address including a family member's address other than the child's only or main residence will not be accepted.

(ii) If parents are separated, the application should be made by the parent the child normally lives with. Where a child spends equal time during the school week with each parent, the exact arrangements must be made clear in a letter with a copy of any custody or residency order submitted with the application. It is the parents' responsibility to agree between themselves and make clear which address will be used and to provide supporting evidence in respect of that address. An application can only be processed from one address. The final decision about which address is to be used rests with Haringey Council.

(iii) Previously looked after children include those children who appear (to the admission authority) to have been in state care outside of England and ceased to be in state care as a result of being adopted. A child is regarded as having been in state care outside of England if they were in the care of or were accommodated by a public authority, a religious organisation, or any other provider of care whose sole or main purpose is to benefit society.

(iv) A sibling is a full brother or sister, a step/half brother or sister, a foster brother or sister or an adopted brother or sister living at the same address as the student for whom the application is being made.

(v) Haringey measures distance in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system. Measurements by alternative systems or to other points will not be taken into account in any circumstances. Where applicants have identical distance measurements, priority amongst them will be determined at random using a computerised system.

Equality Impact Assessment (EQIA)

The Equality Impact Assessment (EQIA) form is a template for analysing a policy or proposed decision for its potential effects on individuals with protected characteristics covered by the Equality Act 2010.

The council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

Also included in the consultation is an opportunity for stakeholders to add comments about the mandatory Fair Access Panel (FAP).

1. Responsibility for the Equality Impact Assessment

Name of proposal:	**Admissions Arrangements and proposed reductions in surplus Primary school places**
Service Area:	**Schools and Learning**
Officer Completing Assessment:	**Nick Shasha**
Equalities Advisor:	**Vlada Shevelkova**
Cabinet meeting date (if applicable):	**6 February 2024**
Director/Assistant Director	**Jane Edwards**

2. Executive summary

Please complete this section *after* completing the rest of the form and summarise:

- The policy proposal, its aims and objectives, the decision in consideration. Please focus on **the change** that will result from this decision.
- Results of the analysis: potential positive and negative equality impacts

- Mitigations that will be taken to minimise negative equality impacts (if relevant)
- Next steps (this may include: if/when the EQIA will be refreshed, planned consultation, future stages of the project).

This proposal concerns Admissions Arrangements for 2025/26 and proposed reductions in surplus Primary school places.

This EQIA covers the proposal to reduce capacity across our primary school estate by 3 forms of entry. This is to be achieved through the following reductions:

- St Mary's Priory RC Junior (reducing from 60 to 30)
- St Francis de Sales RC Junior (reducing from 60 to 30)
- St Ignatius RC Primary (reducing from 60 to 30)

Haringey currently has a surplus in excess of 14% for Reception places and reducing the PAN as planned would help bring the surplus closer to the DfE guidance of around 5%.

The 2023 School Place planning report indicates that this surplus is projected to grow to over 500 places by 2027/28 if no action is taken.

The proposal will ensure that sufficient school places are available to meet local demand. The proposed reduction of PANs for some schools will allow better alignment of PANs with actual number of pupils on roll, leading to cost savings. This is likely to enhance the sustainability of Haringey's current offer at primary education, benefitting the diversity of education choice. Should demand for local school places grow the PAN could be easily increased, as there will not be any changes to the accommodation at the school.

We will ask for approval from Cabinet to consult on our proposed admission arrangements, including the proposals as shown below:

School name and planning area	**Published Admission Number (PAN)**		
	Current	**Proposed**	**Reduction**
St Mary's Priory Junior Catholic Primary School, N15 5RE – **PA3**	60	30	-30
St Francis de Sales RC Catholic Junior Primary School, N17 8AZ – **PA4**	60	30	-30
St Ignatius RC Primary School, N15 6ND – **PA3**	60	30	-30

The schools shown in the table above are located in our Planning areas 3 and 4 where the most significant surplus of places is found. Current school roll projections for planning area 3 suggest a surplus of around 1-2 forms of entry (fe) between 2024/25 and 2030/31 – this if after significant reductions in local capacity from 510 Reception places to 420 from 2023 onwards. Projections for planning area 4 suggest a surplus of around 4-5fe between 2024/25 and 2030/31.
It is likely that reductions in capacity will have a ripple effect locally as falling demand is rarely evidenced at just one school but is often felt across several. A further benefit

of planning places judiciously is that it keeps rolls relatively buoyant across and beyond any planning area as surplus places are reduced.

We are proposing to reduce the number of available places at these schools to enable them to operate more efficiently and cost effectively. The proposed reduction of PANs for these schools will allow better alignment of PANs with actual number of pupils on roll, leading to cost savings.

Consulting on our admission arrangements for entry in September 2025/26 gives these schools sufficient time to make the necessary internal organisational adjustments so that any potential impact on staff is limited. It will allow the school leadership teams in offering a more accurate number of places and also help with long term planning.

Equality consideration was given to the selection of these specific schools for a reduction in PANs to help frame any potential impact on protected groups. Our proposal will not adversely impact on families trying to access their local school with high quality provision. A projected surplus of school places in the planning areas where these schools are located means that we expect sufficient places to still be available for local children if the PANs are reduced as proposed.

All local schools are able to support children with a wide range of abilities, special needs, disabilities and learning difficulties, from able, gifted and talented pupils to those with multiple and significant disabilities, medical conditions and learning difficulties. The schools that are proposed to take PAN reductions do not offer any specific provision that is not provided elsewhere and we believe that the needs of the community can be met at other local schools and this will be tested during the consultation process. We will closely monitor the number of primary applications received at the time and in the event there is an increase in demand for primary school places and additional places are required, these schools can revert to their original PAN.

The key stakeholders are parents and carers that are staff in Haringey primary schools who wish to apply for school places for their children. Additional stakeholders are staff employed in the affected Haringey primary schools.

To ensure as wide a consultation as possible we intend to provide details of the proposed admission arrangements in the following ways:

- through the Schools Bulletin which is distributed to the head teacher and chair of governors of every school in the borough
- letter to all Haringey schools including those proposed for PAN reductions
- to all children’s centres in the borough

- to all registered nurseries and child minders and any other early years providers
- on the Council's online primary and secondary admissions page
- via information in all libraries across the borough
- to all councillors
- to both MPs with constituencies in Haringey
- to the diocesan authorities
- to all residents' groups that the Council hold information for
- to all women's groups that the Council hold information for
- other groups, bodies, parents and carers as appropriate

An Equalities Impact Assessment (EqIA) will form an important part of the consultation and will seek to ascertain whether the proposed reduction in PAN at the schools mentioned previously could have an impact on protected groups and whether there are steps that can and/or should be taken to mitigate against such an impact.

3. Consultation and engagement

3a. How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff? Detail how your approach will facilitate the inclusion of protected groups likely to be impacted by the decision.

The consultation seeks to establish the key concerns and issues of stakeholders and clarify if they identify those issues also shown in the EQIA. Stakeholders such as pupils, parents, carers, school staff and governors will be invited to participate in a consultation and share their views including whether or not they agreed with each proposal and if not, why not. To this purpose an annual Admissions Arrangements survey has been developed which attempts to ascertain views on several education themes such as Primary, Secondary and Sixth form.

To ensure as wide a consultation as possible, a range of modes and methods of communication will be used to inform and facilitate feedback from stakeholders regarding the proposal -

- through the Schools Bulletin which is distributed to the headteacher and chair of governors of every school in the borough
- to all children's centres in the borough
- to all registered nurseries and child minders and any other early years providers
- on the Council's online primary and secondary admissions page
- via information in all libraries across the borough
- to all councillors

- to both MPs with constituencies in Haringey
- to the diocesan authorities
- to neighbouring authorities
- other groups, bodies, parents and carers as appropriate

Stakeholders will also be given the opportunity to express their views in writing via a questionnaire – both electronically and via the hard copy attached to the consultation document, by email and post.

Stakeholders are also invited to comment on the mandatory Fair Access Panel (FAP). The FAP aims to:

- acknowledge the real needs of vulnerable young people who are not on the roll of a school and to ensure that an appropriate placement is identified quickly and pupils are on roll within 15 days of the panel

- seek to find an alternative placement or support for those on roll of a school where it can be demonstrated that they are at risk of permanent exclusion

- fairly share the admission of vulnerable students across all schools and Academies (where the panel agree that another mainstream school place should be identified)

- arrange such admissions openly through a process which has the confidence of all

- record the progress and successes of the young people placed through this panel

The most recent data from the FAP shows that 175 children were admitted to Haringey schools using the fair access protocol between 1 August 2022 and 31 July 2023.

It should be noted that as the specification of the FAP is determined by the School Admissions Code (September 2021) and no changes to its current operation are proposed in this consultation.

3b. Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics.

A consultation survey on the 2025/26 Admissions Arrangements and proposed PAN reductions was conducted and received 5 responses.

Some key themes and concerns emerged from the analysis of the survey. These, and rebuttals to them, are fully explored in the report itself. Please see Appendix 8

for more details. One respondent mentioned that they were unhappy with the proposal to reduce the number of admission whilst another that they felt the Catholic Diocese needed to make some difficult decisions around schools in specific parts of the borough (probably inferring a school closure rather than PAN reduction). Another respondent also suggested school closure as a solution though made no observation about school type or physical location.

Given that the proposal to reduce PAN at selected primary schools is focused on reducing surplus (not needed) capacity it was not felt that the responses to the survey outlined any specific Equalities impacts except for the impact upon staff groups at schools. This theme (staff impact) is explored in the relevant protected characteristics below where applicable.

4. Data and Impact Analysis

Note: officers may want to complement their analysis with data from the State of the Borough and ward profiles, found here: https://www.haringey.gov.uk/local-democracy/about-council/state-of-the-borough.

Please consider how the proposed change will affect people with protected characteristics.

4a. Age

Data
Borough Profile[1]
56,718: 0-17 (21%)
72,807: 18-34 (27%)
68,257: 35-49 (25%)
44,807: 50-64 (17%)
28,632: 65+ (11%)

Target Population Profile[2]
Early years (0-4) and Primary school age pupils (5-11)

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

The latest data from the ONS 2021 Census and the PLASC School Census has been produced below:

[1] Source: State of the Borough
[2] ONS 2021 Census First Release

ONS 2021 Census
0-4 (14,900 and 5.7% of the total Haringey population)
M: 7,600 F: 7,300

5-9 (14,700 and 5.6% of the total Haringey population)
M: 7,500 F: 7,200

10-14 (15,600 and 5.9% of the total Haringey population)
M: 7,900 F: 7,700

Total Haringey Population as at 2021: 264,200
M: 127,100 F: 137,000

PLASC School Census data as at May 2023
Service users (Primary and secondary children by Age and gender)

Year group	Male	Female	Grand Total
Reception	1,449	1,295	2,744
Year 1	1,367	1,360	2,727
Year 2	1,451	1,399	2,850
Year 3	1,446	1,390	2,836
Year 4	1,420	1,351	2,771
Year 5	1,477	1,351	2,828
Year 6	1,502	1,363	2,865
Grand Total	10,112	9,509	19,621

Source: School Census May 2023

Historically, the number of children entering Haringey's school system has increased year-on-year though primary cohorts are now reducing. The School census data from May 2023 indicates a general even split across each of the age groups, with no overrepresentation in any of the age cohorts and no resultant implications anticipated in relation to the school admissions proposals.

Detail the findings of the data.

a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
b) Might members of this group be disproportionately affected by this proposal as a result of a need related to their protected characteristic?

a) The distribution of the primary school age cohort almost exactly replicates that of the broader population as is to be expected.

b) It is not anticipated that either the school admissions proposals or proposed reductions in planned admission numbers at several primary schools will disproportionately affect any potential pupils since the proposal relates to the removal of surplus (not needed) school places.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The proposal is likely to have neutral impacts.

4b. Disability[3]

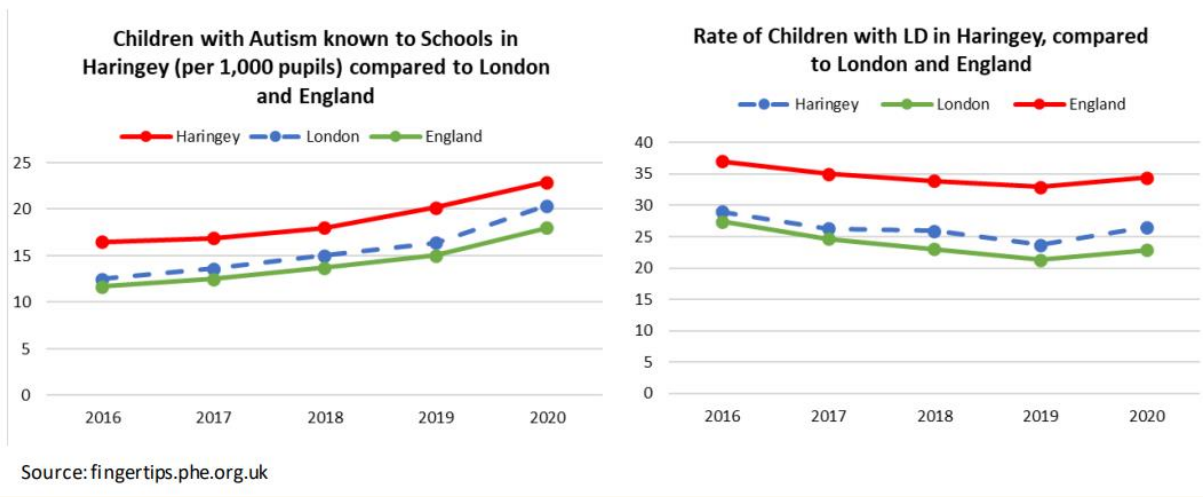
Data

Borough Profile [4]

		Disabled under the Equality Act			Not disabled under the Equality Act		
Age range	**Cohort size**	**Total**	**Day-to-day activities limited a lot**	**Day-to-day activities limited a little**	**Total**	**Has long-term physical or mental health condition but day-to-day activities are not limited**	**No long-term physical or mental health conditions**
Haringey							
Aged 9 and under	29,667	3%	1%	2%	97%	2%	95%
Aged 10 to 14	15,569	6%	2%	3%	94%	2%	92%
Aged 15 to 24	29,816	9%	3%	6%	91%	4%	88%
London							
Aged 9 and under	1.6m	4%	2%	2%	96%	1%	95%
Aged 10 to 14	535k	6%	3%	4%	94%	2%	91%
Aged 15 to 24	1.33m	9%	3%	6%	91%	4%	87%
England							
Aged 9 and under	6.4m	5%	2%	3%	95%	2%	93%
Aged 10 to 14	3.4m	9%	3%	5%	91%	3%	88%
Aged 15 to 24	6.2m	12%	4%	8%	88%	5%	83%

Source: ONS 2021 Census (Table RM073 Disability by sex by age)

[3] In the Equality Act a disability means a physical or a mental condition which has a substantial and long-term impact on your ability to do normal day to day activities.
[4] Source: 2021 Census



Target Population Profile
Early years (0-4) and Primary school age pupils (5-11).

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

The data used will be data on disability from the 2021 ONS census, data from Public Health England and the distribution of Children & Young People with statements or plans maintained by Haringey as at March 2023.

Total number of Children & Young People with statements or plans maintained by Haringey, Mar 2023:

Year	**Totals**	**Year**	**Totals**
Pre-School/Nursery	49	Year 9	156
Reception	105	Year 10	186
Year 1	135	Year 11	180
Year 2	167	Year 12	158
Year 3	157	Year 13	159
Year 4	161	Year 14	129
Year 5	175	Year 15	115
Year 6	176	Year 15 plus	211
Year 7	183	**Totals**	2,791
Year 8	189		

Source: Haringey SEN team 2023

The data demonstrates that there are a range of children with disabilities and that they are evenly represented across age groups. The proposed arrangements prioritise children meeting the criteria for a statement of special educational needs as well as also giving priority to children with social and medical considerations that meet the criterion for an exceptional medical or social need. We do not hold data on pupils with less complex disabilities who do not qualify for either category.

Detail the findings of the data.

a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

a) The distribution of the children and young people with statements or plans maintained by Haringey is broadly the same by individual year group and is unlikely to be impacted by the proposed removal of surplus primary school places at mainstream (not specifically SEND settings).

b) It is not anticipated that either the school admissions proposals or proposed reductions in planned admission numbers at several primary schools will disproportionately affect any potential pupils with statements or plans maintained by Haringey since the proposal relates to the removal of surplus (not needed) school places.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

This proposal is likely to have neutral impacts.

4c. Gender Reassignment[5]

Data

Borough Profile

The latest 2021 Census has published the following data on the population aged 16+.

Gender identity	2021

[5] Under the legal definition, a transgender person has the protected characteristic of gender reassignment if they are undergoing, have undergone, or are proposing to undergo gender reassignment. To be protected from gender reassignment discrimination, an individual does not need to have undergone any specific treatment or surgery to change from one's birth sex to ones preferred gender. This is because changing ones physiological or other gender attributes is a personal process rather than a medical one.

Gender identity the same as sex registered at birth	193,177
Gender identity different from sex registered at birth but no specific identity given	1,377
Trans woman	383
Trans man	389
All other gender identities	537
Not answered	20,137
Total: All usual residents aged 16 years and over	**216,000**

The data above shows that the majority of 16+ residents in Haringey have the same gender identity as sex registered at birth (193,177) whilst 383 residents reported as trans women and 389 as trans men[6].

Target Population Profile
Early years (0-4) and Primary school age pupils (5-11).

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

None though please see central government data mentioned above on the 16+ population of Haringey.

Detail the findings of the data.

a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

There is no reason to think that the proposed admissions arrangements will impact this protected group.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

This proposal is likely to have no known impacts.

[6] Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.

4d. Marriage and Civil Partnership

Data

Borough Profile [7]

Never married and never registered a civil partnership (51.7%)
Married or in a registered civil partnership (33.7%)
Separated, but still legally married or still legally in a civil partnership (2.8%)
Divorced or civil partnership dissolved (8.2%)
Widowed or surviving civil partnership partner (3.5%)

Target Population Profile

Parents/carers of pupils at Haringey Primary schools and Primary school teaching staff only.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Census 2021 data on marriage and civil partnership as shown above

Detail the findings of the data.

a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

All decisions will ensure all couples in a civil partnership are treated exactly the same as couples in a marriage.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

This proposal is likely to have no known impacts.

4e. Pregnancy and Maternity

Data

Borough Profile [8]
Live Births in Haringey 2020: 3,376

[7] Source: 2021 Census
[8] Births by Borough (ONS)

Target Population Profile
Early years (0-4) and Primary school age pupils (5-11)

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

ONS Live births data and GLA School roll projections

The ONS data below shows the recent decline of birth rates in Haringey. Birth rates are a key determinant in the likely demand for subsequent school places. Data below from the 2023 School Place Planning report also show a projected fall in the number of Reception places required (the second column) versus the number of Reception places currently provided (the third column) at primary schools between now and 2030.

Figure 16- Births in Haringey, 2002 to 2021
Source: ONS Birth data (2002-2021)

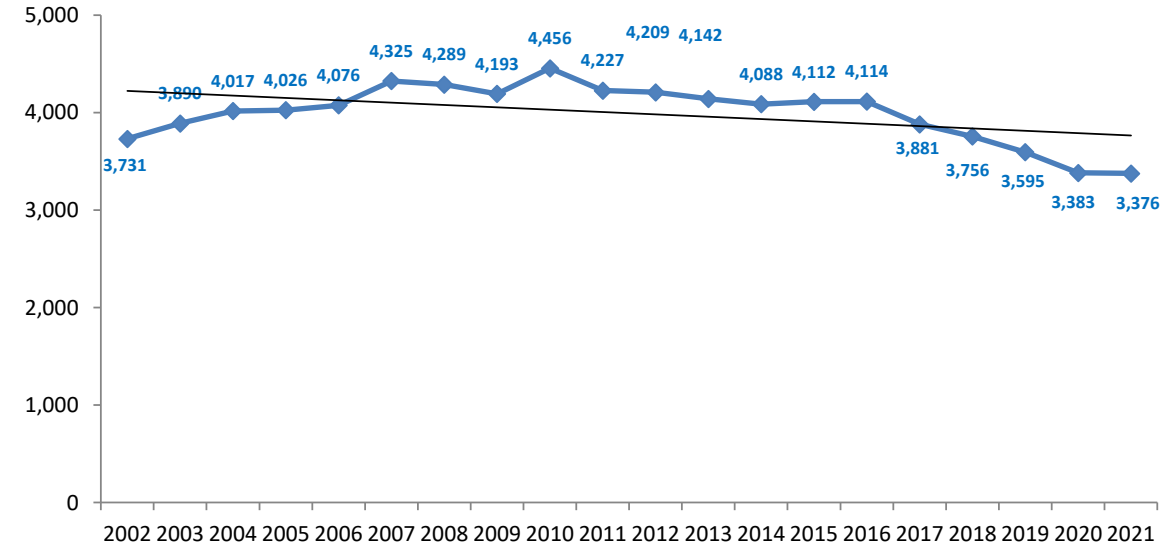


Table 1 – Reception places borough wide

Intake year	Reception aged pupils	Number of school places across borough	% of reception surplus	Deficit/surplus No. of places	Equivalent Form of Entry (fe)
2018/19	3,029 (actual)	3,290	7.90%	261	9fe
2019/20	2,952 (actual)	3,296	10.40%	344	12fe
2020/21	2,934 (actual)	3,236	9.3%	302	10fe
2021/22	2683 (actual)	3,088	13.1%	405	15fe

2022/23	2,720 (actual Jan 2023)	3,026*	10.1%	306	10fe
2023/24	2,589	3,056	15.3%	467	16fe
2024/25	2,530	2,936	13.8%	406	14fe
2025/26	2,446	2,936	16.7%	490	16fe
2026/27	2,483	2,936	15.4%	453	15fe
2027/28	2,434	2,936	17.1%	502	17fe
2028/29	2,480	2,936	15.5%	456	15fe
2029/30	2,503	2,936	14.7%	433	14fe
2030/31	2,508	2,936	14.6%	428	14fe

Source: 2018-2023 January PLASC counts and GLA 2023 School roll projections – 10 year constrained 3/4 model

Detail the findings of the data.

a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

There is no reason to think that the proposed admissions arrangements will impact this protected group.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

This proposal is likely to have no known impacts.

4f. Race

In the Equality Act 2010, race can mean ethnic or national origins, which may or may not be the same as a person's current nationality.[9]

Data

Borough Profile [10]
Other ethnic group: **9.7% in total**
Arab: 1%
Any other ethnic group: 8.7%

Asian: **8.7% in total**

[9] Race discrimination | Equality and Human Rights Commission (equalityhumanrights.com)
[10] Source: 2021 Census

Bangladeshi: 1.8%
Chinese: 1.5%
Indian: 2.2%
Pakistani: 0.8%
Other Asian: 2.4%

Black: **17.6% in total**
African: 9.4%
Caribbean: 6.2%
Other Black: 2.0%

Mixed: **7.0% in total**
White and Asian: 1.5%
White and Black African:1.0%
White and Black Caribbean: 2.0%
Other Mixed: 2.6%

White: **57.0% in total**
English/Welsh/Scottish/Norther Irish/British: 31.9%
Irish: 2.2%
Gypsy or Irish Traveller: 0.1%
Other White: 22.1%

Target Population Profile

Early years (0-4) and Primary school age pupils (5-11) and parents/carers of pupils plus teaching staff

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?
2021 Census data (as shown above) plus data from the DfE Schools, pupils and their characteristics as at 2022/23 and the SFR (Statistical First Release) 25 for teaching staff.

Ethnic composition (main groups) of Haringey's school pupil population as at 2022/23 (state funded primary):

Haringey (Sub category)		
	Number	**%**
Any other ethnic group	1,639	7.8%
Asian - Any other Asian background	386	1.8%
Asian - Bangladeshi	446	2.1%

Asian – Chinese	228	1.1%
Asian – Indian	229	1.1%
Asian - Pakistani	170	0.8%
Black - Any other Black background	485	2.3%
Black - Black African	2,577	12.3%
Black - Black Caribbean	1,003	4.8%
Mixed - Any other Mixed background	1,302	6.2%
Mixed - White and Asian	595	2.8%
Mixed - White and Black African	340	1.6%
Mixed - White and Black Caribbean	596	2.9%
Unclassified	334	1.6%
White - Any other White background	5,886	28.2%
White - Gypsy/Roma	77	0.4%
White – Irish	156	0.7%
White - Traveller of Irish heritage	29	0.1%
White - White British	4,417	21.1%
Grand Total	**20,895**	**100%**

Source: DfE Schools, pupils and their characteristics as at 2022/23 (State funded primary)

The data demonstrates the significant diversity of school-age children in Haringey, with a general overrepresentation of some minority groups compared with data on the wider Haringey population. 28.2%of Haringey's primary age pupils are from Any other white background whilst 21.1% are White-British. Some 12.3% of primary age pupils are Black African and 4.8% are Black Caribbean. 7.8% of pupils are from any other ethnic group, with a level of representation seen across all other ethnic groups too.

Service users (parents/carers)

There is no data available on the ethnicity of parents and carers. However, this should largely reflect the ethnicity figures set out above in respect of pupils, as their children (with the exception of children in care that may be placed in foster care).

2021 Census data indicates the following: English/Welsh/Scottish/Norther Irish/British: 31.9%, followed by White – Other (22.1%), 9.4% are Black African (9.4%) and Black Caribbean (6.2%) – please see table above for a fuller breakdown. While not a direct mirror of the data seen across the pupil cohort, the trends are not too dissimilar.

Staff at All Haringey state funded schools (Headcount)

Ethnic background	**Total**	**Percentage (%)**

White	1,470	62%
Black or Black British	311	13%
Information not yet obtained	238	10%
Asian or Asian British	171	7%
Any other Mixed background	109	5%
Any other ethnic group	68	3%
Refused	14	1%
Total	**2,382**	**100%**

Support Staff at all Haringey nursery and primary settings

Staff Group	Number	(% of all support staff)
Administrative staff		
Ethnic Minority Group (including white minorities)	143	7.0%
Information not yet obtained	40	2.0%
Not Minority Ethnic Group	90	4.4%
Refused	4	0.2%
Total	**277**	**13.5%**
Auxiliary staff		
Ethnic Minority Group (including white minorities)	396	19.4%
Information not yet obtained	93	4.5%
Not Minority Ethnic Group	137	6.7%
Refused	3	0.1%
Total	**629**	**30.8%**
Other school support staff		
Ethnic Minority Group (including white minorities)	77	3.8%
Information not yet obtained	9	0.4%
Not Minority Ethnic Group	52	2.5%
Total	**138**	**6.7%**
Teaching assistants		
Ethnic Minority Group (including white minorities)	561	27.4%
Information not yet obtained	189	9.2%
Not Minority Ethnic Group	239	11.7%
Refused	7	0.3%
Total	**996**	**48.7%**
Technicians		
Ethnic Minority Group (including white minorities)	1	0.0%

Information not yet obtained	1	0.0%
Not Minority Ethnic Group	3	0.1%
Total	**5**	**0.2%**
Grand Total	**2,045**	**100%**

Source: DfE School workforce data 2022 School workforce in England, Reporting year 2022 – Explore education statistics – GOV.UK (explore-education-statistics.service.gov.uk)

The staff ethnicity data shows the broad composition of ethnicities among classroom and non-classroom staff.

For teaching staff in Haringey schools there is a majority (62%) of the White group compared those in other ethnic groups. This contrasts with most types of support staff who tend to come from an Ethnic minority group including white minorities. Direct comparison of teaching staff and support staff is complicated by the different methodologies used.

A greater proportion of Haringey teachers identify as White (62%) compared to Haringey state funded primary age pupils (50.5%).

Detail the findings of the data.

a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

There is no reason that the removal of surplus primary school places will negatively impact pupils, parents/carers or teachers based upon their ethnicity especially as the proposal relates to the removal of surplus places that are not needed.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The Local Authority has a duty to ensure the proposed arrangements do not unfairly disadvantage any child based on race. While there is an overrepresentation of children from ethnic minority backgrounds among the pupil population of Haringey, the admissions arrangements apply across the piece regardless of ethnic identity. It should however be recognised that the operation of the Fair Access Protocol may have a particular positive impact on pupils from certain ethnic minority groups who meet its requirements, recognising the intersection between race and ethnicity,

socioeconomic disadvantage, and disadvantage as a whole, which the Protocol is targeted at addressing.

This proposal is likely to have positive impacts.

4g. Religion or belief

Data

2021 Census update

As of early January 2023 the ONS have released some data on religion from the latest 2021 census. The table below (for all usual Haringey residents irrespective of age) is shown for guidance. It shows proportional declines in religious observance for most groups.

All Haringey residents	Percentage - % 2021 / (2011)	Number
Christian	39.3 (45.0)	103,944
No religion	31.6 (25.2)	83,535
Religion not stated	8.0 (8.9)	21,027
Muslim	12.6 (14.2)	33,295
Jewish	3.6 (3.0)	9,397
Hindu	1.3 (1.8)	3,529
Buddhist	0.9 (1.1)	2,455
Sikh	0.3 (0.3)	892
Other religion	2.3 (0.5)	6,164
Total	100%	264,238

Source: ONS - 2021 Census data for Haringey (2011 data in brackets)

Note: * Totals may not add up due to rounding

Target Population Profile

Early years (0-4) and Primary school age pupils (5-11) and parents/carers of pupils plus teaching staff

What data will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Religion or belief is not covered by the PLASC school census, which means that we don’t have access to relevant records. The best alternative proxy is the 2021 Census on religion by age for the age groups Aged 2 and Under and Aged 3 to 15 years expressed as percentages.

	Aged 2 years and under		Aged 3 to 15 years	
	Percentage (%)	Cohort size	Percentage (%)	Cohort size
No religion	33%	3,042	10,116	26%
Christian	30%	2,712	14,431	37%
Buddhist	0%	25	158	0%
Hindu	1%	88	314	1%
Jewish	7%	601	2,851	7%
Muslim	16%	1,457	6,999	18%
Sikh	0%	37	141	0%
Other religion	1%	117	762	2%
Not answered	11%	1,034	3,352	9%
Total	264,238	100%	39,124	39,124

Source: ONS (2021 Census data for Haringey)

Note: * Totals may not add up due to rounding

The data demonstrates that Christian and Muslim pupils are the largest faith groups within Haringey's cohort for those aged 2 years and under (30% and 16% respectively) and 3 years to 15 years (37% and 18% respectively). Around a third of the Aged 2 and under cohort report No religion compared to around a quarter (26%) of the 3 years to 15 years cohort.

Service users (parents/carers)

While there is no data available on religious beliefs of Haringey parents/carers, 2021 Census data follows the trend seen above, indicating that Christianity and Islam are the main religions in Haringey (39.3% and 12.6% respectively), with 31.6% of residents having no religion.

Staff at Haringey schools

There is no publicly available data on the religious beliefs of Haringey's schools staff. These may reflect the borough-wide position.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

There is no reason that the removal of surplus primary school places will negatively impact pupils, parents/carers or teachers based upon their religion or no religion especially as the proposal relates to the removal of surplus places that are not needed.

Haringey has a large number of Church of England and Catholic primary schools in the borough. These schools have seen pupil numbers fall more significantly than

other schools which is likely to be related to the consistent drop in the local population who identify as Christian and the rise of those with no stated religion (see table above on Census data from 2011 and 2021). We are not proposing to make physical reductions in the size of these schools and should demand return the schools can reinstate their previous admission numbers.

This proposal is likely to have neutral impacts.

4h. Sex

Data
Borough profile [11]
Females: (51.9%)
Males: (48.1%)

Target Population Profile

Early years (0-4) and Primary school age pupils (5-11) and parents/carers of pupils plus teaching staff

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

2021 Census data as shown above, PLASC School census data and SFR25 data from the DfE.
Service users (Primary age children by Sex)

	Primary Reception to Yr 6	Primary Reception to Yr 6
Female	9,509	48.5%
Male	10,112	51.5%
Grand Total	**19,621**	**100%**

Source: School Census May 2023

There are slightly more male than female pupils in both primary and secondary schools.

Service users (parents/carers)

Borough wide data indicates that there is a gender split of males 51.% to females 48.1%. There is no available data indicating the proportion of each which is also a parent/carer.

Staff at all Haringey state funded schools - Headcount

[11] Source: 2021 Census

	Male (%)	Female (%)
Teachers	679 (28.5%)	1,703 (71.5%)
Teaching assistants	202 (13.3%)	1,317 (86.7%)
Other support staff	39 (15.1%)	22 (84.9%)
Administrative staff	111 (23.3%)	365 (76.7%)
Technicians	55 (64%)	31 (36%)
Auxiliary staff	105 (12.5%)	732 (87.5%)

Source: DfE School workforce in England (Haringey) 2022

Detail the findings of the data.

a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

The majority of Haringey school staff are female, and this is reflected in each category of school staff except technicians. The imbalance of teaching staff is most apparent amongst auxiliary staff, of which 12.5% are male.

All primary schools within the borough are coeducational. There is sufficient capacity to accommodate pupils of all sexes in a school of preference or within the reasonable travelling distance guidelines set out by the DfE.

For all of these schools, the sex of the pupil is not a factor of the admission arrangements, with no implications therefore based on this protected characteristic.

The admission arrangements do not have an impact on the sex of the different parent/carer compositions within Haringey households.

Sex is not a factor of the admission arrangements, so this protected characteristic is not affected.

Staff at Haringey schools

The main impact of this proposal is that surplus reception places will be reduced in the relevant planning area by reducing capacity. These places are in addition to those projected to be required by pupils it is anticipated that no impact on this characteristic (sex) will occur for pupils.

This change in reception place provision is likely to result in the reduction of teaching and teaching assistant staff required. As a greater proportion of school staff are women rather than men it is more likely women will be affected by this change.

Any potential impact needs to be evaluated in the context of scale. Assuming that the proposed schools reduce their PAN by one form of entry redundancy or redeployment of staff at this school is likely to occur. It is likely that a class teacher and teaching assistant (2 staff) will be affected for each year of PAN reduction. Affected staff should be supported by appropriate procedures such as access to a redeployment pool and support given to find another role in Education.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

This proposal is likely to have negative impacts on some female staff at the proposed schools.

4i. Sexual Orientation

Data

Borough profile [12]

3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013. In Haringey this equates to 8,454 residents.

The latest 2021 census has collected data on sexual orientation for the first time and data from Haringey in shown below:

	Number	Percentage (%)
Straight or heterosexual	180,100	83.4%
Gay or Lesbian	5,912	2.7%
Bisexual	4,503	2.1%
All other sexual orientation	1,752	0.8%
Not answered	23,733	11.0%
Total	**216,000**	**100%**

Target Population Profile

Parents/carers of pupils plus teaching staff

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

ONS Integrated Household survey as shown above and 2021 ONS Census data.

[12] Source: ONS Integrated Household Survey

Detail the findings of the data.

a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

We do not anticipate that the admissions arrangements will have any impact on people based on their sexual orientation and we will continue to ensure there is no discrimination based on sexual orientation.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

This proposal is likely to have no known impacts.

4j. **Socioeconomic Status (local)**

Data

Borough profile

Income

6.8% of the population in Haringey were claiming unemployment benefit on 10 August 2023.[13]
20.0% of the population in Haringey were claiming Universal Credit on 12 September 2023 (% of population aged 16-65 on Universal Credit) [14]
34% of employee jobs in the borough are paid less than the London Living Wage.[15]

Educational Attainment

While Haringey's proportion of students attaining grade 5 or above in English and Mathematics GCSEs is higher than the national average, it is below the London average.[16]

[13] ONS Claimant Count
[14] LG Inform
[15] ONS, ASHE survey July 2023 Percentage of employee jobs in London paid below the London Living Wage by borough

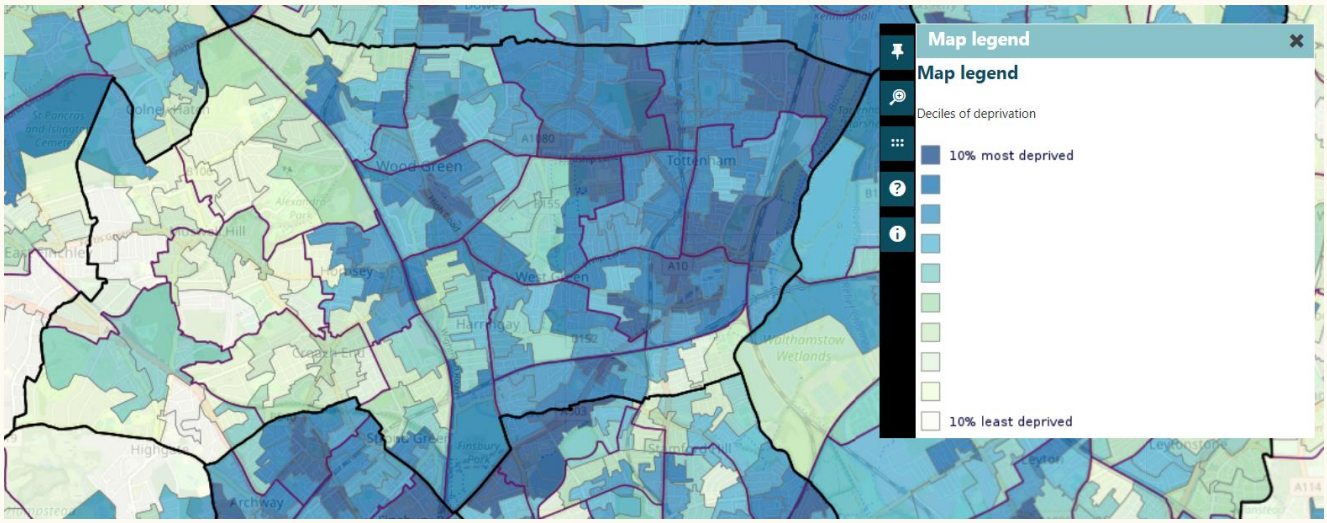
[16] LG Inform - qualifications

4.4% of Haringey's working age populations had no qualifications in 2020.[17] 4.8% were qualified to level one only.[18]

Area Deprivation

Haringey is the 4th most deprived in London as measured by the IMD score 2019. The most deprived LSOAs (Lower Super Output Areas or small neighbourhood areas) are more heavily concentrated in the east of the borough where more than half of the LSOAs fall into the 20% most deprived in the country.[19]

This trend is illustrated in the map below where the darker shaded areas show data from the 2019 IDACI (Income Deprivation affecting children index).
Source: Indices of Deprivation - London Datastore



Target Population Profile

Early years (0-4) and Primary school age pupils (5-11) and parents/carers of pupils plus teaching staff

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Deprivation and Educational attainment data as listed above.

Detail the findings of the data.

a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

[17] LG Inform - qualifications
[18] LG Inform – level one
[19] State of the Borough (p.21)

The proposal does include reducing the number of surplus Reception places at several Haringey primary schools. These are predominantly in the East of the borough as this where the greatest number of surplus places exists. There should be no impact on early years and primary school age pupils as this proposal relates to the removal of surplus (not needed) school places so no pupil should be disadvantaged.

The proposal could result in potential redundancy or redeployment of teaching staff.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

This proposal is likely to have neutral impacts on early years and primary school age pupils. It could have a negative impact on teaching staff in the affected schools.

5. Key Impacts Summary

5a. Outline the key findings of your data analysis.

The key finding is that the removal of surplus (not needed) school places at a number of selected primary schools is unlikely to have any material impact on existing or future pupils at those schools. It is likely to lead to those affected schools having improved finances and thus sustainability due to the way that schools funding is directly relating to pupil numbers. Moreover as this proposal does not impact the net capacity of schools (the amount of pupils these school can accommodate) any increase in demand for local school place in future can be easily accommodated without even the need for a formal consultation – this is called reinstatement of PAN (planned admission number).

Equality consideration was given to the selection of these specific schools for a reduction in PAN to help frame any potential impact on protected groups. These schools were identified as potential candidates for a reduction in discussions held with school leaders and governors in a series of geographical cluster workshops during the Autumn Term 2023. Amendment to PAN and local/planning area capacity has been considered in the context of the effects on local provision, looking at recruitment patterns to local schools and ensuring that the knock-on effects in the adjustment of PANs is considered.

All three schools are located in the Planning Areas with the most vacancies in the borough (Planning Areas 3 and 4) and the highest concentration of Catholic schools in near proximity to one another. This area is therefore one of the most acutely affected by unused places and the reduction in demand has impacted these school's ability to manage class sizes and effective pupil to teacher ratios. We are consulting on reducing PAN from September 2025 to assist these schools in managing the impact of lower pupil numbers.

5b. Intersectionality

- Many proposals will predominantly impact individuals who have more than one protected characteristic, thereby transforming the impact of the decision.
- This section is about applying a systemic analysis to the impact of the decision and ensuring protected characteristics are not considered in isolation from the individuals who embody them.
  Please consider if there is an impact on one or more of the protected groups? Who are the groups and what is the impact?

The proposal is likely to have a positive impact on groups with intersecting protected characteristics. These groups include:

- Children from ethnic minority groups may be more likely to experience positive benefits from the FAP, as they may be overrepresented in the groups that the FAP targets. Evidence shows that they are more likely to face socioeconomic disadvantage, are overrepresented among the population of children in care or children who are looked after and are more likely to have a disability or special educational needs. The prioritisation of the admissions criteria means that children from ethnic minority backgrounds are on the whole likely to be positively impacted by the proposed arrangements.

In terms of potential negative impacts:

5c. Data Gaps

Based on your data are there any relevant groups who have not yet been consulted or engaged? Please explain how you will address this

It is not felt that there are groups who have not been considered already in the above analysis.

6. Overall impact of the policy for the Public Sector Equality Duty

Summarise the key implications of the decision for people with protected characteristics.

In your answer, please consider the following three questions:

- Could the proposal result in any direct/indirect discrimination for any group that shares the relevant protected characteristics?

- Will the proposal help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not?

- Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

The admission arrangements do not differ materially from the arrangements for previous years, and we therefore do not consider that there are any new or specific equalities issues to emerge from these general admissions arrangements. We continue to monitor and assess the impact of any changing trends for consideration when admissions criteria are set each year.

The proposal may have a positive impact on children from ethnic minority groups.

It is not felt that there will be any difference in the relations between groups who share the above characteristics and those who do not given there are no material differences from arrangements for previous years and that the removal of Reception school places are surplus to demand and thus unused.

As mentioned above there is a possibility that this proposal could adversely impact female teachers / teaching assistants as several staff members at each school may be made redundant or re-deployed and there is a greater concentration of females than males amongst teachers and teaching assistants in Haringey schools.

However the proposal is a reasonable and proportionate response to ensure the sustainability and breadth of offer at Haringey's primary school estate. Doing nothing would put many schools under intolerable financial burden which could negatively impact wider educational outcomes.

Moreover, following the results of the consultation it is proposed to consider any possible mitigating factors that may alleviate impacts of these teachers / teaching assistants. Careful monitoring of in-year admissions and school roll projections data will also ensure that if additional Reception places are required they are immediately fulfilled.

7. Amendments and mitigations

7a. What changes, if any, do you plan to make to your proposal because of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EQIA guidance

Please delete Y/N as applicable

No major change to the proposal: the EQIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them **Y**

Adjust the proposal: the EQIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly set out below the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below **N**

Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision. **N**

7b. What specific actions do you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty?

Action:

We are not proposing to take any specific actions further to analysis and outcome of the consultation.

7. Ongoing monitoring

Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented.

- Who will be responsible for the monitoring?
- What the type of data needed is and how often it will be analysed.
- When the policy will be reviewed and what evidence could trigger an early revision
- How to continue to involve relevant groups and communities in the implementation and monitoring of the policy?

Training – Staff in the Haringey School Admissions and Organisation Service are provided with yearly refresher training in line with the admission arrangements and appeal regulations which addresses any changes to either the criteria or co-ordinated schemes.

Monitoring - The Head of Admissions and School Organisation at Haringey Council will be responsible for monitoring. The School Admissions Return to DfE is an annual report which sets outs information on the effectiveness of the admission arrangements and compliance with the requirements of the Code. The annual report to the Office of Schools" Adjudicators monitors the fairness of the admission arrangements. This information is reported to the DfE and the OSA annually.

Two main mechanisms will be used by the DfE to provide feedback on how effective the measures in the revised Codes and regulations have been and to inform future policy development. In producing his annual report for the Secretary of State, the Schools Adjudicator will take account of the reports he will receive from each local authority on the legality, fairness, and effectiveness of local admission arrangements.

Appeal arrangements - Admission arrangements are subject to an appeal process that gives parents the right to appeal decisions. The process is also used to hold admissions authorities to account and ensure that the arrangements have been applied correctly.

Date of EQIA monitoring review:

[Type answer here].

8. Authorisation

EQIA approved by (Assistant Director/ Director) **Jane Edwards**

Date **XX**

9. Publication

Please ensure the completed EQIA is published in accordance with the Council's policy**.**

Please contact the Policy & Strategy Team for any feedback on the EQIA process.

Appendix 8

Admission Arrangements Consultation 2025-26

1. Note: Analysis as at 16.42pm on 4th January 2024. N=5

2. Please indicate which of the following schools you have an interest in? N=4

School name	School name
St Mary's Priory Catholic Infant School (4)	St Ignatius Primary School (3)
St Francis de Sales Catholic Junior Primary School (1)	

3. Please tell us who you are - tick all options that apply? N=5

Response	Number	Percentage (%)
Resident	1	20%
Parent / Carer	2	40%
Teacher or other school staff	0	0%
Headteacher	2	40%
Governor	0	0%
Local authority	0	0%
Other	0	0%
N =	5	100%

* respondents allowed to tick as many categories that apply

The most popular respondent type were parent / carers and Headteachers (2 each) followed by 1 resident. Respondents were allowed to tick as many categories as applicable.

4. Please let us have your view on the proposed PAN reductions at the selected schools? N=4

View - I am unhappy with the proposal to reduce the number of admission.
Response – The aim of proposed PAN reductions is to ensure the sustainability and breadth of the existing primary school offer in Haringey. The number of children born in Haringey has declined by around a quarter since 2016 so reductions in school capacity are essential.
View - I think the diocese needs to look at the number of Catholic schools in the area along St. Anne's Road and make some difficult decisions rather than reduce the PAN.
Response – The council is not the key decision-maker with regards to Catholic schools in the borough, but our in-depth analysis undertaken in our Risk Matrix should help the Diocese to clarify their best options going forward. It's also worth mentioning that reductions in PAN have been a dynamic response to the issue of falling rolls (hence their inclusion again this year) but that the other

measures we are considering (amalgamations, federations, closures etc) are also part of a related longer-term strategy.
View - If there are not sufficient pupils to fill all schools then you have to reduce the numbers of classes. If there are a great number of empty places you should close a school permanently and sell the site.
Response – We are looking to reduce capacity across our primary school estate and have already undertaken reductions in recent years. Future utilisation of any former school site is also carefully considered. We are considering a variety of actions including amalgamations, federations and school closures as part of a long term strategy.
View - I'm writing as I feel the Diocese does need to make some decisions regarding this. St. Mary's Priory and St. Ignatius are less than a mile apart on St. Anne's road. Surely they need to look at what is sustainable here rather than reducing the PAN of both? There is a third catholic school further along St. Anne's Rd which is small and full. You keep citing how so many schools are reducing to 1fe in Haringey and then tell us how 1fe schools are less viable. It seems to me that historical LA 1fe / small schools are often popular and well managed financially and are being lumped with those being (sadly) forced to shrink due to falling rolls and these schools have all the overheads of a 2fe regarding staff structures etc. What is the solution here?
Response – Falling rolls are likely to exacerbate funding challenges for schools of all sizes. We have now completed our Risk Matrix for all primary schools and compiled a simple methodology document which will be shared with NLC Chairs and the Education Strategy Board explaining the factors and weights chosen. The Risk Matrix analysis takes into account around 9 separate indicators that give a nuanced and robust picture of the relative health of every single primary school setting within the borough. Our analysis will be shared with both Diocese and all Haringey stakeholders. You'll be aware that the council is not the key decision-maker with regards to Catholic schools in the borough, but our in-depth analysis should help the Diocese to clarify their best options going forward. It's also worth mentioning that reductions in PAN have been a dynamic response to the issue of falling rolls (hence their inclusion again this year) but that the other measures we are considering (amalgamations, federations, closures etc) are also part of a related longer-term strategy.

5. Please use the space below if you have any other comments or views on the proposed admissions arrangements and co-ordinated schemes set out in

Sections 1-7. N=0

No responses to this question

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Report for:	Cabinet - 6th February 2024
Title:	Acceptance of GLA Single Homelessness Accommodation Programme (SHAP) grant funding to acquire 10 Homes.
Report authorised by:	**David Joyce, Director of Housing, Regeneration and Planning**
Lead Officer:	**Robbie Erbmann, Assistant Director of Housing** **020 8489 1784**
Ward(s) affected:	All
Report for Key/ Non Key Decision:	**Key Decision**

1. Describe the issue under consideration

1.1. This report recommends accepting grant of capital allocation of £2,011,642 to acquire 10 homes during 2024/25 from the Mayor's Single Homelessness Accommodation Programme (SHAP) and accepting revenue allocation for £1,007,468 to provide 3 years revenue funding to support 20 clients in a Housing First service.

1.2. The Forward Plan entry is amended to the wording above to reflect the additional revenue allocation.

2. Cabinet Member Introduction

2.1. We are committed to ending street homelessness in Haringey, and as a Council we undertake a range of bold and innovative work to try to achieve that objective. I'm delighted that we have secured more than £3 million in grant funding from the Mayor of London, enabling us to deliver high-quality supported accommodation so people can rebuild their lives after the trauma of having to sleep rough on our streets. We are one of only a few councils to have secured a grant in this funding round, and I am proud that this reflects the quality of our work with some of our most vulnerable residents.

2.2. If Cabinet agree to accept this grant, we will be able to acquire ten new homes for residents with experience of rough sleeping. We know that accommodation provision is more than just bricks and mortar, and that often people who have experienced rough sleeping may have additional complex

needs, therefore securing additional revenue grant funding to help set up and run a support service for the tenants of those homes is welcome.

2.3. People moving into these new homes will be moving on from our more intensive housing support services. Not only will this create a pathway for them towards independence and recovery, but it will also free up spaces in their previous accommodation for people with complex needs who are right now having to sleep on our streets.

2.4. We are pleased that the Mayor has recognised the urgency of the situation we face and our commitment to help those in the greatest need.

3. Recommendations

3.1. It is recommended that Cabinet:

3.1.1. In accordance with Contract Standing Order 17.1 and Contract Standing Order 9.07.1(d), approves the acceptance of Capital (£2,011,642) and Revenue (£1,007,468) grant funding from the Mayor's Single Homelessness Accommodation Programme (SHAP), the terms of which are summarised below in part 6.

3.1.2. Delegates authority to agree the final grant documentation and contracts to the Director of Housing, Planning and Regeneration, after consultation with the Director of Finance and the Head of Legal and Corporate Governance (Monitoring Officer).

4. Reasons for decision

4.1. The Council is committed to providing housing and support for vulnerable residents in the Borough. This decision is an important step in achieving that aim.

4.2. Accepting this grant is an opportunity to lever more funding into our programme - which will mean overall the council will be able to deliver more homes for rent.

5. Alternative options considered

5.1. The only alternative is not to accept the grant. Choosing that option will directly impact on the council's ability to purchase 10 homes and extend the service to 20 people, resulting in more people sleeping rough and / or staying in temporary accommodation at greater cost to Haringey.

6. Background information

6.1. The Mayor's Single Homelessness Accommodation Programme (SHAP) is a joint programme by the GLA and Department for Levelling Up, Housing and Communities (DLUHC).

6.2. The Single Homelessness Accommodation Programme has been developed to meet gaps in existing housing pathways and address currently unmet need. Capital funding is available for homes that will start and complete from April 2023 to the end of March 2025, and up to three years' of revenue funding is available to fund much-needed support to the Londoners who will move into these homes.

6.3. Haringey's services for residents with experience of rough sleeping/complex needs is at capacity. Due to the complexity of needs for this group on average residents spend 1-3 years in intensive housing prior to stepping down into less intensive/independent accommodation. The Housing First provision would allow those who are able, to move on, reducing risk of creating dependence and maximising use of intensive housing for those most in need.

6.4. The Council has been awarded a capital funding allocation of up to £2,011,642 to support the purchase and refurbishment of ten 1-bedroom homes that meet the grant criteria and suitability for the Housing First support model.

6.5. The funding conditions relate to achieving milestone dates ensuring a legal interest is secured in the properties and they are ready to let within agreed milestones from April 2024 to March 2025.

6.6. The Council has been awarded a revenue funding allocation of £1,007,468 which will support setting up and running a service for 20 clients for 3 years.

6.7. Revenue milestones are reflected in the setting up of the service, recruitment and taking on the first clients to work with the team. The revenue will pay for all aspects of staffing, office costs, training, and a personal budget to be used in the support of each of the people working with the service. Key Performance Indicators are also minimal, looking at the tenancy sustainment rate of people working with the service and reflecting the complexity of the cohort of people.

6.8. Grant conditions are shown in the GLA's template grant funding agreement attached as Appendices 1 and 2 and available online at https://www.london.gov.uk/programmes-strategies/housing-and-land/increasing-housing-supply/funding-supported-and-specialist-housing.

7. Contribution to the Corporate Delivery Plan 2022-2024 High level Strategic outcomes'

7.1. The proposal would help to help to meet the following High-Level Outcomes within the Council's Corporate Delivery Plan 2023 – 2024:

7.1.1. Theme 5 - Homes For the Future - Everyone has a home that is safe, sustainable, stable, and affordable.

Specifically, the intermediate outcomes that:

- An improvement in the quality of housing and resident services in the social rented sector. Whereby the properties to be acquired will undergo works to ensure they meet decent homes standards and energy efficient measures are undertaken where possible.
- There will be a co-ordinated and compassionate response for single adults who are facing homelessness

7.1.2. Theme 4 Adults Health and Welfare - All adults are able to live healthy and fulfilling lives, with dignity, staying active, safe, independent, and connected in their communities.

Specifically, the intermediate outcomes that:

- The service will support Tenancy sustainment and provide a move-on offer for people living in our hostel pathways.

and that

- there will be a decrease in rough sleeping in the borough.

8. Carbon and Climate Change

8.1. The acquisition properties will undergo void works that incorporate energy efficiency measures where required. As well as reducing the running costs for the tenants moving into these homes, the improvements will contribute to the council's net zero ambitions by improving the energy efficiency and sustainability of its stock.

9. Statutory Officers comments

9.1. **Finance**

9.1.1. The capital grant awarded of £2.01m for acquisition of 10 homes represent grant of £0.2m per unit, towards single homelessness accommodation scheme.

9.1.2. The acquisition of these homes, and its implication have been assessed within the HRA financial model.

9.1.3. Finance is satisfied that the acquisition of these homes, with this level of grant can be contained within the current HRA budget/MTFS.

9.1.4. The revenue grant awarded of £1,007,468, which represents funding to support 20 clients in a Housing First service, equates to grant per client per year of £16,791.13.

9.1.5. It is estimated that this grant will fund the cost of support services received by the clients over a period of 3 years.

9.1.6. There is a potential risk should the revenue grant not be extended beyond 3 years. This risk is however low and can be managed via the annual strategic resources review.

9.2. **Procurement**

9.2.1. Strategic Procurement note the contents of this report and confirm Contracts Standing Order 17.1 requires approval of Cabinet to accept grants of £500,000 or more from external bodies.

9.2.2. Strategic Procurement confirms there are no procurement related matters preventing Cabinet from approving the Recommendation stated in paragraph 3 above.

9.3. **Head of Legal & Governance (Oliver Higgins, Principal Lawyer)**

9.3.1. The Head of Legal and Governance (Monitoring Officer) has been consulted in the preparation of this report.

9.3.2. Pursuant to CSO 17.1 and CSO 9.07.1(d) Cabinet has the power to approve receipt of the grant referred to in the recommendations in the report.

9.3.3. The Head of Legal and Governance (Monitoring Officer) sees no legal reasons preventing Cabinet approving the recommendations in the report.

9.4. **Equality**

9.4.1. The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

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

9.4.2. The three parts of the duty applies to the following protected characteristics: age disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex, and sexual orientation. Marriage and civil partnership status apply to the first part of the duty.

9.4.3. Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

9.4.4. As part of the council's Rough Sleeping Strategy (2023 – 2028) a comprehensive Equalities Impact Assessment was carried out to help identify how these groups of people in Haringey compared more broadly to the average across all the data collected on Combined Homelessness and Information Network (CHAIN).

9.4.5. The decisions in this report are designed to accept a grant through the SHAP Housing First, which will put in place appropriate financial arrangements to support the ongoing acquisitions programme and to deliver the Housing First support service. This will help to increase the supply of homes which are genuinely affordable to residents by delivering additional council-rented homes.

9.4.6. The decisions in this report are designed to accept a grant through the SHAP Housing First, which will put in place appropriate financial arrangements to support the ongoing acquisitions programme and to deliver the Housing First support service. This will help to increase the supply of homes which are genuinely affordable to residents by delivering additional council-rented homes.

9.4.7. The decisions in this report are designed to accept a grant through the SHAP Housing First, which will put in place appropriate financial arrangements to support the ongoing acquisitions programme and to deliver the Housing First support service. This will help to increase the supply of homes which are genuinely affordable to residents by delivering additional council-rented homes.

9.4.8. Additionally, it is noted there are no negative impacts on those with protected characteristics expected from these decisions.

10. Use of Appendices

10.1. Appendix 1: Template -SHAP Capital Grant Agreement (LA version)
10.2. Appendix 2: Template -SHAP Revenue Grant Agreement
10.3. Appendix 3: Grant funding outcome letter dated 15th November 2023 (This is exempt under section 12a of the Local Government Act 1972, in particular paragraphs 3 and 5).

11. Background papers

11.1. There are no background papers for this report

12. External Links:

12.1. Grant conditions are shown in the GLA's template grant funding agreement attached as Appendices 1 and 2 and available online at https://www.london.gov.uk/programmes-strategies/housing-and-land/increasing-housing-supply/funding-supported-and-specialist-housing

'External links – Haringey Council is not responsible for the contents or reliability of linked web sites and does not necessarily endorse any views expressed within them. Listing should not be taken as endorsement of any kind. It is your responsibility to check the terms and conditions of any other web sites you may visit. We cannot guarantee that these links will work all of the time and we have no control over the availability of the linked pages.'

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dated **2023**

Greater London Authority

and

[Grant Recipient]

Single Homelessness Accommodation Programme (SHAP) – Capital Grant Agreement (Local Authority)

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Grant Agreement

dated **2023**

Parties

(1) **Greater London Authority** of City Hall, Kamal Chunchie Way, London E16 1ZE (the **GLA**); and

(2) [XXX**]** whose registered office is at [XXX] (the **Grant Recipient**).

Introduction

(A) The Localism Act 2011 devolved the housing and regeneration functions of the Homes and Communities Agency (now known as Homes England) in London to the GLA.

(B) The Grant Recipient has submitted a bid to the GLA for grant funding to assist the Grant Recipient in meeting the capital costs of the delivery of specialist accommodation for individuals in the Programme Client Group.

(C) The GLA has agreed to advance grant funding to the Grant Recipient pursuant to the GLA's Single Homelessness Accommodation Programme to facilitate the delivery of certain affordable housing projects subject to and in accordance with the terms of this Agreement.

(D) Capital grant paid by the GLA to the Grant Recipient pursuant to this Agreement is social housing assistance as defined in Section 32(13) of the Housing and Regeneration Act 2008.

(E) The purpose of the grant provided under this Agreement is to fund affordable housing which will be owned and operated by a local authority and the parties have entered into this Agreement on the basis that no Subsidy therefore arises.

Agreed Terms

1 **Definitions and interpretation**

1.1 **Definitions**

In this Agreement unless the context otherwise requires the following terms shall have the meanings given to them below:

Acceptance Date means the date upon which the GLA accepts a proposed scheme for the delivery of SHAP Housing as a Named Project pursuant to Condition 7.3;

Acquisition means the acquisition by the Grant Recipient of:

(a) a Completed Interest in a Named Project; or

(b) where the GLA has provided the Drawdown Confirmation, a Contractual Interest in a Named Project;

Acquisition Date means the date identified on OPS on which the Grant Recipient is forecast to achieve and does achieve Acquisition;

Acquisition Tranche Grant means subject to Condition 7.6, such sum as is equivalent to the percentage of the Named Project Grant recorded on and agreed by GLA through OPS as payable when the Grant Recipient has achieved the Acquisition Date;

Acquisition (No Work Required) Project has the meaning attributed to it in the Agreed Principles;

Acquisition (Work Required) Project has the meaning attributed to it in the Agreed Principles;

Actual Project Costs means the amount of Project Costs actually incurred by the Grant Recipient in the Delivery of each Named Project;

Additional Indicative Project means an indicative project for the expected delivery of SHAP Housing proposed by the Grant Recipient under Condition 19 in addition to those indicative projects comprised within the Original Approved Bid;

Additional Named Project means a project for the delivery of SHAP Housing proposed by the Grant Recipient under Condition 19 in addition to those projects comprised within the Original Approved Bid;

Additional Project means an Additional Named Project or an Additional Indicative Project;

Additional Project Acceptance Date means the date upon which the GLA confirms acceptance of an Additional Project pursuant to Condition 19.3;

Affordable Housing Capital Funding Guide means the guide of that name published on www.london.gov.uk/CFG or any successor guide so published subject to such amendments variations or updates to the same as may be published from time to time;

Affordable Rent means a rent to be assessed and set in accordance with the applicable requirements of the Affordable Housing Capital Funding Guide, Legislation, the Rent Standard and any other relevant guidance issued by the Regulator (as any of the same may be amended, replaced or updated from time to time) which represents the lower of:

(a) eighty per centum (80%) of the market rent (inclusive of service charges) for an equivalent property of the relevant size and location located in the Broad Market Rental Area in which the relevant SHAP Dwelling is located; or

(b) the relevant Local Housing Allowance figure (plus service charge) for an equivalent property located in the Broad Market Rental Area in which the relevant SHAP Dwelling is located

(unless the relevant SHAP Dwelling qualifies as Exempt Accommodation in which case the above limb (a) shall apply);

Affordable Rent Level means a rent which does not exceed an Affordable Rent (subject to Condition 2.4);

Agreed Principles means the principles and terms set out in Schedule 1;

Agreed Purposes means the purposes for which each of the SHAP Dwellings is to be used, being:

(a) during the Minimum Period of Use, the Agreed SHAP Purposes; and

(b) after the expiry of the Minimum Period of Use, the Agreed Long Term Purposes;

Agreed Long Term Purposes means subsidised housing provided by the Grant Recipient pursuant to this Agreement that will be made permanently available to individuals at either a:

(a) Affordable Rent; or

(b) Social Rent;

Agreed SHAP Purposes means the purposes for which each of the SHAP Dwellings is to be used during the Minimum Period of Use, being:

(a) the provision of supported longer-term housing for individuals in the Programme Client Group; and

(b) the tenure (including the relevant rent levels) for which each of the SHAP Dwellings is to be used,

as such purposes are further described in the Named Project Details;

Agreement means this SHAP Agreement (including its Schedules, Annexures and Appendices (if any));

Agreement Information means:

(a) this Agreement in its entirety (including changes to the Agreement that may be agreed from time to time); and

(b) data extracted from the claims made under this Agreement which shall consist of the Grant Recipient's name, the expenditure account code, the expenditure account code description, the document number, the clearing date and the claim amount;

AHP 2021/26 means the GLA's Affordable Homes Programme 2021-2026;

Allocated Grant means £[XXX], being the maximum amount of grant payable by the GLA to the Grant Recipient in respect of the Approved Bid (as the same may be amended from time to time in accordance with the terms of this Agreement);

Alternative Nominating Body means a body other than the Nominating Body identified in the Named Project Details at the Acceptance Date or Additional Project Acceptance Date (as applicable);

Alternative Purpose has the meaning attributed to it in Condition 4.4;

Alternative Tenancy Support SLA means a new or updated Tenancy Support SLA (with any incoming Tenancy Support Services Provider notified the GLA on OPS) in a form acceptable to the GLA which does not disrupt the provision of Tenancy Support Services for the relevant Tenant(s);

Applicable Tranche means (subject to Condition 11.3) the Tranche identified on OPS as payable once the Grant Recipient has achieved the Milestone set out on OPS which must be achieved prior to the Grant Recipient making a claim for such Tranche;

Approved Bid means the aggregate of the Named Projects and Indicative Projects (if any) accepted by the GLA in OPS as at the date of this Agreement (as the same may be amended, added to, supplemented, substituted or varied in accordance with the terms of this Agreement);

Benefit Cap means the amount of benefit to which the Tenant is entitled pursuant to part 8A of the Housing Benefit Regulations 2006;

Bidding Prospectus means the "Single Homelessness Accommodation Programme prospectus" dated December 2022 published at https://www.london.gov.uk/programmes-strategies/housing-and-land/increasing-housing-supply/funding-supported-and-specialist-housing and any updates published or issued from time to time in relation thereto;

Broad Market Rental Area has the meaning specified in paragraph 4 of Schedule 3B Rent Officers (Housing Benefit Functions) Order 1997, or article 3 Rent Officers (Universal Credit Functions) Order 2013 as appropriate;

Building Contract means the contract entered into between the Grant Recipient and the Building Contractor relating to the construction, development, conversion, refurbishment, repair and/or Rehabilitation (as applicable) of a Named Project;

Building Contractor means the contractor or developer appointed or to be appointed by the Grant Recipient in respect of a Named Project;

Business Day means any day other than a Saturday, Sunday or a statutory Bank Holiday in England;

Capital Grant has the meaning set out in the Recovery Determination;

Capital Grant Recoverable means such amount of Capital Grant and interest thereon as the GLA is entitled to Recover under the Recovery Determination;

CDM Regulations means the Construction (Design and Management) Regulations 2015 S.I. No 2015/51;

CEDR means the Centre for Effective Dispute Resolution;

Certified Design Standards means the minimum design standards in accordance with which the SHAP Dwellings in a Named Project will be delivered as certified by the Grant Recipient on OPS as part of its bid;

Certified Standards means the Certified Design Standards and the Certified Sustainability Standards;

Certified Sustainability Standards means the sustainability standards which the SHAP Dwellings in a Named Project will be delivered to as certified by the Grant Recipient on OPS as part of its bid;

Change in Control means the Grant Recipient is or will be subject to a process of local government re-organisation approved by the Secretary of State which results in another local authority obtaining the legal capacity, power and authority to become a party to and to perform the obligations of the Grant Recipient under this Agreement;

CME Period means the period from the date of this Agreement until 30 November 2023 (or such later date as the GLA may in its absolute discretion agree);

Committed Number has the meaning ascribed to it in limb (b) of the definition of "Indicative Projects";

Competent Authority means (as the case may be):

(a) such persons officeholders and bodies (however constituted) that are specified under any Subsidy Control Requirements as having responsibility for monitoring compliance with and/or legally enforcing Subsidy or the Subsidy Control Requirements or otherwise authorised to recover any Unlawful Subsidy; or

(b) the courts of England and Wales;

Completed Interest means a Secure Legal Interest which meets the description of either (as applicable):

(a) limbs (a) or (b) of the definition of Secure Legal Interest (Short Term); or

(b) limbs (a) to (c) of the definition of Secure Legal Interest (Long Term);

save that the parties agree that with respect to any New Build Project limb (a) of the above definition shall be of no effect;

Completion means:

(a) that stage in the Delivery of a Named Project when the Grant Recipient holds a Completed Interest in each SHAP Dwelling comprised within the Named Project;

(b) each SHAP Dwelling comprised within the Named Project is fit for beneficial occupation as a residential development and meets the SHAP Minimum Standards and the terms of this Agreement; and

(c) when the Works have been completed in accordance with the terms of the Building Contract and the applicable NHBC or equivalent requirements current at the date of inspection (where relevant) and the dwellings are subject only to the existence of minor defects and/or minor omissions at the time of inspection which are capable of being made good or carried out without materially interfering with the beneficial use and enjoyment of the Named Project and which would be reasonable to include in a snagging list,

and **Complete** shall be construed accordingly;

Completion Tranche Grant means subject to Condition 7.6 such sum as is equivalent to the percentage of the Named Project Grant recorded on and agreed by GLA through OPS as payable when the Grant Recipient has achieved the Completion;

Completion Year has the meaning attributed to it in limb (a) of the definition of Indicative Projects;

Compliance Audit means the procedure (in a form advised by the GLA from time to time) by which an auditor independent of the Grant Recipient certifies whether the Named Projects Delivered pursuant to this Agreement satisfy the GLA's procedural compliance requirements (as described in the Affordable Housing Capital Funding Guide);

Compliance Checklist means a document in the form identified as the "GLA Resident Ballot Compliance Checklist" in Section 8.5.19 of the Affordable Housing Capital Funding Guide (subject to such amendments, variations or updates to the same as the GLA may make from time to time) completed (such that each response to the questions posed in the Compliance Checklist is in the affirmative) and signed by the Grant Recipient, counter-signed by the Independent Body and in a form satisfactory to the GLA;

Compliant EDI Action Plan means an EDI Action Plan which has been developed, published and implemented at the date of this Agreement pursuant to the requirements of an agreement entered into with the GLA under AHP 2021/26;

Condition Precedent means receipt by the GLA of the Legal Opinion;

Consents means any necessary approval, authorisation, consent, exemption, licence, permit, permission or registration by or from any Relevant Authority;

Contract Monitoring Outputs has the meaning given to it in Condition 3.1;

Contractual Interest means a Secure Legal Interest which meets the description of either (as applicable):

(a) limb (c) of the definition of Secure Legal Interest (Short Term); or

(b) limb (d) of the definition of Secure Legal Interest (Long Term);

save that the parties agree that with respect to any New Build Project limb (a) of the above definition shall be of no effect;

Data Controller has the meaning ascribed to it in the Data Protection Legislation;

Data Protection Legislation means the UK GDPR, the Data Protection Act 2018 and any other relevant national Legislation implementing or supplementing the UK GDPR, and any formal guidance or codes of conduct issued by the Information Commissioner (or other Relevant Authority) in each case as amended, superseded or replaced from time to time;

Data Subject has the meaning ascribed to it in the Data Protection Legislation;

Decent Homes Standard means the Decent Homes Standard current at the Acceptance Date or Additional Project Acceptance Date (as applicable) of the relevant Named Project;

Default Event has the meaning given to it in Condition 5.1;

Delivery means the acquisition, development, conversion, refurbishment, repair and/or Rehabilitation (as applicable) of the Site and/or the Named Project (as the context requires) and **Delivered** and **Delivers** shall be construed accordingly;

Delivery Period means the period from the date of this Agreement until 31 March 2028 (or such other date as the GLA may determine);

Differential Grant Amount is the difference between (1) the Named Project Grant sum in respect of a Named Project prior to a reduction pursuant to Condition 7.8.2 and (2) the Revised Named Project Grant Sum;

Disposal means other than a Permitted Disposal, a transaction the effect of which is that the legal or beneficial title in any SHAP Dwelling or property comprised in a Named Project in or on which any SHAP Dwelling have been or are to be developed (as the case may be) transfers or becomes vested in or is leased to or reverts to another person;

Disposal Notification means a written notification addressed to the GLA which identifies:

(a) the nature of the Disposal;

(b) the number and address of the SHAP Dwellings and/or other property comprised within the Disposal;

(c) the disponee;

(d) whether the disposal will occur before or after the expiry of the Minimum Period of Use for each SHAP Dwelling comprised in the Disposal (and such evidence as the GLA may require to verify this); and

(e) the amount of Named Project Grant allowed to the SHAP Dwelling or property comprised within the Disposal and the quantum of such grant which is either proposed to be applied towards a Substitute Dwelling or which the Grant Recipient will repay to the GLA and/or recycle into the Grant Recipient's RCGF in accordance with the terms of this Agreement and the Recovery Determination;

DLUHC means the Department for Levelling Up, Housing and Communities (or any successor body with similar or equivalent jurisdiction or authority);

Drawdown Condition means any conditions identified by the GLA in writing which must be met by the Grant Recipient on terms satisfactory to the GLA (in its absolute discretion) prior to the Grant Recipient submitting an application for Acquisition Tranche Grant pursuant to pursuant to Condition 10.1 which could include:

(a) the provision of such evidence as the GLA may request (in form and substance satisfactory to the GLA) with respect to the Grant Recipient's Secure Legal Interest or the registration of the same at the Land Registry; and/or

(b) entry into such additional or ancillary documentation as the GLA may determine;

Drawdown Confirmation means written confirmation from the GLA that the Grant Recipient may, subject to the satisfaction of any Drawdown Condition identified by the GLA in its absolute discretion, submit an application for Acquisition Tranche Grant pursuant to Condition 10.1 when it possesses a Contractual Interest;

Dwelling Completion means the dwelling is fit for beneficial occupation as a residential dwelling in accordance with applicable NHBC or equivalent requirements current at the date of inspection subject only to the existence of minor defects and/or minor omissions at the time of inspection which are capable of being made good or carried out without materially interfering with the beneficial use and enjoyment of the dwelling and which would be reasonable to include in a snagging list, and Dwelling Complete shall be construed accordingly;

EDI Action Plan has the meaning given to it in Condition 26.1.2;

EIR means the Environmental Information Regulations 2004, together with any guidance and/or codes of practice issued by the Information Commissioner in relation to such statutory instrument;

EIR Exemption means any applicable exemption to EIR;

Eligible Tenant means a Tenant who falls within the Project Client Group;

Enterprise means an entity or a group of entities constituting a single economic entity, regardless of its legal status, that is engaged in an economic activity by offering goods or services on a market;

Estate Regeneration Default means any of the events or circumstances set out in Conditions 5.1.17 to 5.1.19 (inclusive) has occurred;

Estate Regeneration Funding Condition means the obligations set out in Condition 8.2;

Estate Regeneration Project means a Named Project which in whole or in part comprises or entails regeneration or another arrangement which satisfies the description of a Strategic Estate Regeneration Project set out in Section 8.3 of the Affordable Housing Capital Funding Guide;

Estate Regeneration Requirement means the obligations set out in Condition 8.2 and/or Condition 8.6.13;

Exempt Accommodation has the meaning attributed to it in paragraph 4(10), of Schedule 3 Housing Benefit and Council Tax Benefit (Consequential Provisions) Regulations 2006;

Exempted Information means any Information that is designated as falling or potentially falling within the FOIA Exemptions or the EIR Exemptions;

Exemption means an exemption to the Resident Ballot Requirement agreed by the GLA pursuant to Section 8.6 Affordable Housing Capital Funding Guide (subject to such amendments, variations or updates to the same as the GLA may make from time to time);

Exemption Certificate means a certificate identified as an "Exemption Certificate" on GLA letter headed paper and signed by a senior officer of the GLA which confirms that the delivery of the Named Project is subject to an Exemption;

Exemption Evidence means written evidence from the relevant local authority in a form acceptable to the GLA that the relevant SHAP Dwelling is Exempt Accommodation;

Financial Year means from the date of this Agreement to the next 31 March and thereafter from 1 April to 31 March in each year;

First Let means a SHAP Dwelling which has not previously been let as SHAP Housing;

FOIA means the Freedom of Information Act 2000, and any subordinate legislation made under such Act from time to time together with any guidance and/or codes of practice issued by the Information Commissioner in relation to such legislation;

FOIA Authority means a public authority as defined by the FOIA and/or EIR;

FOIA Exemption means any applicable exemption to FOIA;

GLA's Representative means such person or persons as the GLA may nominate to act as its representative from time to time for the purposes of this Agreement;

Good Practice Guide to Estate Regeneration means the guidance entitled "Better Homes for Local People – the Mayor's Good Practice Guide to Estate Regeneration" published by the GLA in February 2018;

Grant Recipient Party means:

(a) the Grant Recipient, any Building Contractor, any Tenancy Support Services Provider, any member of the Professional Team, agent, employee or subcontractor of the Grant Recipient and the Grant Recipient's Representative;

(b) any subsidiary, associate or joint venture in which a local authority has a material interest sufficient to require group financial statements to be prepared which account for these interests, in accordance with CIPFA's Code of Practice on Local Authority Accounting in the United Kingdom 2017/18 (as amended or updated) which is the Statement of Recommended Practice on local authority accounting or any code or other document which replaced it as the Statement of Recommended Practice;

Grant Recipient's Representative means the Grant Recipient's Development Director or such other person agreed by the GLA to act as the Grant Recipient's representative from time to time for the purposes of this Agreement;

Guidance means any applicable guidance standards codes of conduct or directions with which a Registered Provider is from time to time required or expected to comply by the GLA, the Regulator and/or the Department for Levelling Up, Housing and Communities in relation to the SHAP Dwelling;

HRA 2008 means the Housing and Regeneration Act 2008;

HS Act means the Health and Safety at Work etc. Act 1974;

Independent Body means an entity which is independent to the Grant Recipient and has been appointed in accordance with the principles set out in Section 8.5.2 of the Affordable Housing Capital Funding Guide;

Indicative Allocation means such part of the Allocated Grant attributed to the Indicative Projects and agreed by the GLA in OPS;

Indicative Dwelling means a prospective SHAP Dwelling comprised within an Indicative Project;

Indicative Dwelling Allocation means the quantum of the Indicative Allocation which is attributed on OPS to the relevant Indicative Dwelling;

Indicative Dwelling Breach means the Grant Recipient is in breach of any obligation in Condition 6.3 which affects one or more Indicative Dwellings;

Indicative Project means the Grant Recipient's proposal for the Delivery of a specified number of SHAP Dwellings as set out in OPS including details of:

(a) the Financial Year in which such dwellings will achieve Start on Site (**SoS Year**) and Completion (**Completion Year**); and

(b) the number (by tenure) of such dwellings to achieve Completion in each Completion Year (the **Committed Number**);

Information has the meaning in relation to:

(a) the FOIA, given under Section 84 of the FOIA and which is held by the GLA or the Grant Recipient (as appropriate) at the time of receipt of an RFI; and

(b) EIR, given under the definition of environmental information in Section 2 of the EIR and which is held by the GLA or Grant Recipient (as appropriate) at the time of receipt of an RFI;

Information Commissioner means the "Information Commissioner" set out in section 114 of the Data Protection Act 2018 and for the avoidance of doubt is the UK's independent body set up to uphold and enforce information rights from time to time;

Initial Period means a period of three (3) calendar years starting from the date of Dwelling Completion (which must not be later than the Named Project Completion Date);

Insecurely Housed means the relevant individual is homeless or occupying hostel accommodation or other insecure accommodation;

Intellectual Property Rights shall include without limitation all rights to, and any interests in, any patents, designs, trade marks, copyright, know-how, trade secrets and any other proprietary rights or forms of intellectual property (protectable by registration or not) in respect of any technology, concept, idea, data, program or other software (including source and object codes), specification, plan, drawing, schedule, minutes, correspondence, scheme, formula, programme, design, system, process logo, mark, style, or other matter or thing, existing or conceived, used, developed or produced by any person;

Investment Partner means a Registered Provider which has been confirmed by the GLA as having "Investment Partner Status" (whether on a full or restricted basis) under the GLA's Investment Partner qualification procedure from time to time;

Landlord Offer means the offer identified by that name and more particularly described in Sections 8.5.11 to 8.5.16 of the Affordable Housing Capital Funding Guide which is in the form issued to the GLA pursuant to Section 8.5.14 of the Affordable Housing Capital Funding Guide and which is the subject of the confirmations provided by the Grant Recipient and the Independent Body in the Compliance Checklist;

Lapsed SHAP Dwelling means a SHAP Dwelling which is the subject of a Minimum Period of Use Breach;

Law means any applicable law, statute, bye-law, regulation, order, regulatory policy, guidance or industry code, rule of court or directives or requirements of any Regulatory Body, delegated or subordinate Legislation or notice of any Regulatory Body;

Legal Opinion means a legal opinion in the form set out in Schedule 6 given by the Grant Recipient's solicitor and dated prior to the date of this Agreement;

Legislation means:

(a) any Act of Parliament;

(b) any subordinate legislation within the meaning of Section 21(1) of the Interpretation Act 1978;

(c) any exercise of the Royal Prerogative; and

in each case in the United Kingdom; and

(d) any regulations, orders, bye-laws, regulatory policy, guidance or codes of practice of any local or statutory authority or Competent Authority (as the case may be) having jurisdiction over the territory in which the Named Project is situated;

Local Housing Allowance means an allowance determined in accordance with article 4B and Schedule 3B of Schedule 3B to the Rent Officers (Housing Benefit Functions) Order 1997, or article 4 and Schedule 1 to the Rent Officers (Universal Credit Functions) Order 2013, as appropriate;

London Living Wage means the basic hourly wage (before tax, other deductions and any increase for overtime) calculated annually by the Resolution Foundation and overseen by the Living Wage Commission, or any successor body carrying out the relevant calculation as such hourly wage may be updated from time to time;

London Plan means the document entitled "The London Plan – Spatial Development Strategy for Greater London " published by the GLA in March 2021 (as the same may be amended, varied, updated or replaced from time to time);

Material Adverse Effect means the effect of any event or circumstance which is reasonably likely to be materially adverse to the ability of the Grant Recipient to deliver the Approved

Bid or a Named Project (as the context requires) on the basis agreed under this Agreement and/or within the time limits (if any) for doing so;

Milestone means each stage in the delivery of a Named Project agreed by the parties and set out in the Named Project Details (including (as applicable) the Acquisition Date, Start on Site Date and a Named Project Completion Date);

Milestone Date means the date agreed by the GLA through OPS by which the relevant Milestone must have been achieved (as the same may be varied by the GLA pursuant to Condition 9.1);

Milestone Extension Events means any of the following:

(a) exceptionally adverse weather conditions;

(b) delay in receipt of any necessary permission or approval of any statutory body which the Grant Recipient has taken all practicable steps to avoid or reduce;

(c) the exercise after the date of this Agreement by the United Kingdom Government of any statutory power which directly affects the execution of any construction, repair or maintenance works necessary to the delivery of the Named Project in accordance with the SHAP Minimum Standards by restricting the availability or use of labour which is essential to the proper carrying out of such works or preventing access to such goods or materials as are essential to the proper carrying out of such works or the Delivery of the Named Project;

(d) the use or threat of terrorism and/or the activity of the relevant authorities in dealing with such use or threat;

(e) fire, explosion, lightning, storm, tempest, flood, bursting or overflowing of water tanks, apparatus or pipes, ionising radiation, earthquakes, riot and civil commotion;

(f) failure by any statutory undertaker, utility company or other like body to carry out works or provide services;

(g) any accidental loss or damage to the development or any roads servicing it;

(h) any failure or shortage of power, fuel or transport;

(i) any blockade or embargo;

(j) any:

i official or unofficial strike;

ii lockout;

iii go-slow; or

iv other dispute,

generally affecting the house building industry or a significant sector of it;

(k) the appointment of the Building Contractor under the Building Contract has been terminated or the Building Contract has been terminated; or

(l) any material failure by the Building Contractor under the terms of the Building Contract which has the direct result of delaying the Grant Recipient's compliance with a Milestone Date and which did not result from the Grant Recipient's failure effectively to manage the Building Contract;

(m) any impediment, prevention or default, whether by act or omission by the GLA except to the extent caused or contributed to by any default, whether by act or omission, of the Grant Recipient;

unless:

A any of the events arises (directly or indirectly) as a result of any wilful default or wilful act of the Grant Recipient or any of its subcontractors; or

B in respect of the event referred to in (f) above, such event arises as a result of any failure by the Grant Recipient (whether wilful or otherwise) to notify the relevant statutory undertaker or utility company of the requirement for works or services to be completed by the date required to enable the Grant Recipient to complete the Named Project by the Named Project Completion Date;

Milestone Failure means a failure by the Grant Recipient fully to achieve any Milestone by the relevant Milestone Date;

Minimum Building Safety Standards means the standards set out in paragraph 2 of Schedule 4;

Minimum Duration means an unexpired duration which equals or exceeds the Minimum Period of Use for each SHAP Dwelling comprised in the relevant Named Project;

Minimum Period of Use means the number of calendar years identified in the Named Project Details during which any SHAP Dwelling comprised in a Named Project must be used for the Agreed SHAP Purposes such period to be calculated from date of Dwelling Completion (which must not be later than the Named Project Completion Date);

Minimum Period of Use Breach means either:

(a) the circumstances in Condition 4.5.1, Condition 4.6.2 or Condition 16.5 apply;

(b) where the Grant Recipient's Secure Legal Interest is a leasehold interest, such lease is terminated or otherwise comes to an end prior to the expiry of the Minimum Period of Use; or

(c) the GLA has otherwise determined that the Grant Recipient has failed to use any SHAP Dwelling in accordance with the Agreed SHAP Purposes;

Minimum Period of Use Termination Event means this Agreement is or could be terminated in relation to one or more particular SHAP Dwellings pursuant to Condition 5.4.4 or 5.4.5;

Minimum Property Standards means:

(a) the standards described in Schedule 4; and

(b) any property standards set out in any planning obligation contained within any Section 106 Agreement applicable to the Named Project;

Minimum Use Breach Amount means the Recoverable Amount determined in accordance with Condition 14.3.5;

MMC Project means a Named Project comprised exclusively of dwellings constructed using one of the Modern Methods of Construction;

Modern Methods of Construction means the methods of construction identified in Section 2.2.62 (*Modern Methods of Construction (MMC) Categories*) of the Affordable Housing Capital Funding Guide;

Named Project means each project for the delivery of:

(a) a single SHAP Dwelling; or

(b) multiple SHAP Dwellings,

to accommodate individuals from the Project Client Group as detailed in the Named Project Details and accepted by the GLA as a Named Project pursuant to Condition 7.3 or 19.3;

Named Project Completion Date means the date set out in the Named Project Delivery Timetable by which Completion must have been achieved (and is achieved);

Named Project Delivery Timetable means the timetable for the Delivery of each Named Project as set out in the Named Project Details and agreed by the GLA through OPS;

Named Project Details means the descriptive and other details in respect of each Named Project as accepted by the GLA through OPS (as the same may be varied from time to time in accordance with the terms of this Agreement);

Named Project Grant means (subject to Condition 7.8 and Condition 11.3) the amount of grant payable by the GLA in respect of a Named Project as set out in the relevant Named Project Details;

New Build Project has the meaning ascribed to it in the Agreed Principles;

New Named Project means a proposed Named Project or an Indicative Project which the Grant Recipient wishes to profile as a Named Project, details of which are submitted by the Grant Recipient to the GLA pursuant to Condition 7.1;

Nominating Body means the referral body or agency identified and approved by the GLA in the Named Project Details;

Nominations Agreement means the agreement or other arrangement between the Grant Recipient and the Nominating Body in respect of nominations or referrals of the Project Client Group to the SHAP Dwellings;

Nomination Details means such details of the referral and nomination arrangements as have been agreed by the GLA and set out in the Named Project Details;

Non Compliance Notification Date means the date on which the GLA notifies the Grant Recipient that it has become aware that a Named Project in respect of which Named Project Grant has been paid or utilised does not meet the Named Project Details;

Non-Compliant Dwelling means an Indicative Dwelling which is the subject of an Indicative Dwelling Breach;

Non Registrable Lease means a Secure Legal Interest which meets the description of limb (b) (ii) of the definition of Secure Legal Interest (Short Term);

Open Book Basis means the full and transparent disclosure and declaration of all information which the Grant Recipient or a Grant Recipient Party is required to maintain, keep or disclose under this Agreement including all price components including profit margins, central office overheads, purchase prices, preliminaries, contingencies and the cost of all materials, goods, equipment, work and services, apportionments of such items together with all and any books of accounts together with such other information as the GLA reasonably requires ;

Open Book Obligations mean the obligations set out in Condition 17;

OPS means the "GLA Open Project System", being the GLA's on-line investment management system from time to time or any successor system;

Original Approved Bid means the aggregate of the proposed Named Projects and Indicative Projects accepted by the GLA at the date of this Agreement in OPS;

Original Dwelling has the meaning given to it in Condition 16.1;

Original Named Project means the Named Project in which the Original Dwelling was comprised;

Original Named Project Details means the Named Project Details for the Original Dwelling;

Original Named Project Grant means such sum as reflects the Named Project Grant identified in OPS at the Acceptance Date or Additional Project Acceptance Date (as applicable);

Original Percentage means the percentage identified in the "Grant % of Total Costs" line entry in the "Summary" section of the Named Project Details at the Acceptance Date or Additional Project Acceptance Date (as applicable) being the result of the following calculation expressed as a percentage:

(Original Named Project Grant ÷ Total Scheme Costs) x 100;

Partial Termination Event means this Agreement is or could be terminated in relation to one or more particular Named Projects pursuant to Conditions 5.4.2 or 5.4.3;

Permitted Disposal means any of the following:

(a) the grant of a tenancy compliant with Condition 8.6.7;

(b) a disposal to a statutory undertaker for the purposes of the supply or transmission (whether exclusively or otherwise) of statutory services to the Site;

(c) a disposal pursuant to or required by a planning obligation within the meaning of s106 or s299A of the TCPA in connection with the Named Project;

(d) a disposal to a highway authority for the purposes of or in connection with the adoption of roads, footpaths or cycleways on the Site;

(e) the grant of any mortgage or charge; or

(f) the grant of an easement;

Personal Data has the meaning ascribed to it in the Data Protection Legislation;

Policy Statement on Rents for Social Housing means the "Policy Statement" published on 14 December 2022 by DLUHC, as such document and/or associated guidance may be amended, updated or replaced from time to time;

Process has the meaning ascribed to it in the Data Protection Legislation and **Processing** shall be construed accordingly;

Procurement Law means the Public Contracts Regulations 2015, the Concession Contracts Regulations 2016 (insofar as the same are applicable) together with any statutory modification or replacement regulations or Legislation on procurement by public bodies;

Professional Team means (as applicable) the architect, civil & structural engineer, the mechanical & electrical engineer and any other consultant appointed by the Grant Recipient in connection with a Named Project;

Programme Client Group means:

(a) the Target Client Group (Initial); and

(b) where the GLA has so agreed (in its absolute discretion) pursuant to Condition 4.6.1, the Target Client Group (Homelessness);

Prohibited Act means:

(a) offering, giving or agreeing to give to any servant of the GLA any gift or consideration of any kind as an inducement or reward:

i for doing or not doing (or for having done or not having done) any act in relation to the obtaining or performance of this Agreement; or

ii for showing or not showing favour or disfavour to any person in relation to this Agreement;

(b) entering into this Agreement or any other agreement with the GLA relative to this Agreement in connection with which commission has been paid or has been agreed to be paid by the Grant Recipient or on its behalf, or to its knowledge, unless before the relevant agreement is entered into particulars of any such commission and of the terms and conditions of any such agreement for the payment thereof have been disclosed in writing to the GLA;

(c) committing any offence:

i under Legislation creating offences in respect of fraudulent acts;

ii at common law in respect of fraudulent acts in relation to this Agreement;

iii under the Bribery Act 2010 or the Criminal Finances Act 2017; or

(d) defrauding or attempting to defraud or conspiring to defraud the GLA or the Regulator;

Project Client Group means in relation to a Named Project:

(a) such category of individual within the Programme Client Group as is set out in the Named Project Details at the Acceptance Date or Additional Project Acceptance Date (as applicable); or

(b) such other Programme Client Group as the parties may agree in respect of a Named Project in accordance with this Agreement;

Project Costs means the costs relating to Site acquisition and/or Works in relation to a Named Project incurred or to be incurred in respect of such project by the Grant Recipient in respect of the heads of expenditure set out in Part 1 of Schedule 5 (as relevant) or such other heads of expenditure as the GLA may in its absolute discretion agree in respect of any Named Project provided that any costs falling within the heads of expenditure set out in Part 2 to Schedule 5 shall not be capable of being treated as Project Costs;

Proposed Substitute Dwelling means a dwelling uploaded by the Grant Recipient onto OPS in substitution of an Original Dwelling pursuant to Condition 16.1;

Public Sector Funding means all funding in relation to a Named Project in money or money's worth (including the Named Project Grant) received or receivable by the Grant Recipient from public sector bodies including for this purpose funding from the European Union, government bodies (whether national or local) or bodies in receipt of lottery funds from the National Lottery Distribution Fund pursuant to the National Lotteries Acts 1993 and 1998 and any further funding by the GLA not provided under this Agreement;

Quarter Date means 31 March, 30 June, 30 September or 31 December;

RCGF means the Recycled Capital Grant Fund maintained by the Grant Recipient in accordance with the Recovery Determination;

Recover has the meaning set out in the Recovery Determination;

Recovery Determination means the Recovery of Capital Grants from Registered Providers and Recycled Capital Grant Fund (Greater London) General Determination 2017 and any successor determination or other instrument;

Reduction Amount means the result of the following calculation:

> Reduction Amount = number of Non-Compliant Dwellings x the Indicative Dwelling Allocation;

Register means the register maintained by the Regulator pursuant to Section 111 of the HRA 2008;

Registered Provider means an English Local Authority entered on the Register pursuant to paragraph 3 of the Housing and Regeneration Act 2008 (Registration of Local Authorities) Order 2010;

Regulator means the Regulator of Social Housing established pursuant to Chapter 2 of the HRA 2008 or any similar future authority (including any statutory successor) carrying on substantially the same regulatory or supervisory functions;

Regulatory Body means any government departments or regulatory, statutory and other entities, committees and bodies which, whether under statute, rules, regulations, codes of practice or otherwise, are entitled to regulate, investigate, or influence the matters dealt with in this Agreement, the SHAP Dwellings delivered pursuant to this Agreement or any other affairs of the GLA;

Rehabilitated or Rehabilitation or Rehabilitating shall have the meaning ascribed in Section 2.2 of the Affordable Housing Capital Funding Guide entitled "Rehabilitation project types";

Relevant Authority means any governmental or other authority, court with relevant jurisdiction, the local planning authority, landlord, funder, adjoining landowner or any other person whose consent is required to undertake the Works or any actions necessary to the Delivery of the Named Project or perform the Grant Recipient's obligations under this Agreement;

Relevant Event has the meaning ascribed to it in the Recovery Determination;

Relevant FOIA Authority has the meaning given to it in Condition 22.2;

Remediation Plan has the meaning ascribed to it in Condition 26.4.1;

Rent Standard means any standard in relation to rent set by the Regulator from time to time under Section 194 of the HRA 2008, the Policy Statement on Rents for Social Housing, and any other associated explanatory notes or guidance;

Request for Information/RFI shall have the meaning set out in FOIA or any request for information under EIR which may relate to the Indicative Projects, the Named Projects, this Agreement or any activities or business of the GLA;

Resident Ballot Requirement means the obligation to undertake a resident ballot on the basis set out in Section 8 Affordable Housing Capital Funding Guide where the Named Project is an Estate Regeneration Project and GLA has not provided the Grant Recipient with an extant Exemption Certificate;

Review Meeting means a meeting held pursuant to Conditions 3.3 or 3.4;

Revised Named Project Grant Sum means the sum that is equal to the Original Percentage of the Updated Total Scheme Costs;

RIDDOR means Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013;

Right to Buy means the right to purchase a dwelling at a discount conferred on tenants of Councils by Part V of the Housing Act 1985;

Rough Sleepers means individuals who are or will be aged over 18 when they are granted a tenancy or licence of the relevant SHAP Dwelling and either:

(a) in the reasonable opinion of the Grant Recipient are homeless and are Sleeping Rough or have demonstrable history of Sleeping Rough in the immediate past;

(b) do not fall within limb (a) above but in the Grant Recipient's reasonable opinion are:

i Insecurely Housed; and

ii require support services to maintain an independent and settled lifestyle;

RTB Funds means receipts retained by the Grant Recipient pursuant to the exercise of the Right to Buy which shall include any grant paid to the Grant Recipient pursuant to a Right to Buy Ringfence Agreement entered into by the GLA and the Grant Recipient;

Section 15 Direction means a direction made by the Secretary of State under Section 15 of the Local Government Act 1999;

Section 106 Agreement means an agreement or unilateral undertaking in respect of and affecting any SHAP Dwelling made pursuant to section 106 TCPA and/or section 1 Localism Act 2011 and/or section 111 Local Government Act 1972 and/or section 33 Local Government (Miscellaneous Provisions) Act 1982 and/or section 38 and/or section 278 Highways Act 1980 and/or section 104 Water Industry Act 1991 and/or the Housing Acts or any similar agreement or unilateral undertaking with any Relevant Authority or body relating to other services;

Section 106 Project means a project where the SHAP Housing is part of a larger scheme (controlled by a party other than the Grant Recipient) comprising accommodation which is non-residential and/or residential which is not SHAP Housing which is subject to a Section 106 Agreement;

Section 114 Report means a report made under Section 114(3) or Section 114A of the Local Government Finance Act 1988;

Secure Legal Interest means the Grant Recipient has in respect of the Site, in the case of a:

(a) New Build Project, a Secure Legal Interest (Long Term);

(b) Acquisition (No Work Required) Project or Acquisition (Work Required) Project a Secure Legal Interest (Short Term) or a Secure Legal Interest (Long Term);

(c) Social Housing Remodelling or Refurbishment Projects, a Completed Interest

provided that in each case where the Grant Recipient possesses:

(d) the freehold estate and one or more leasehold interests derived from the freehold estate; or

(e) more than one leasehold interest in a chain of leases,

in any Named Project, the interest which is the lowest leasehold interest owned by the Grant Recipient in the chain of leases must satisfy limb (a), (b) or (c) above (as applicable);

Secure Legal Interest (Long Term) means the Grant Recipient has in respect of the Site:

(a) freehold title registered with title absolute;

(b) leasehold title (where the lease has at least 60 (sixty) years unexpired duration) registered with title absolute;

(c) freehold title registered with possessory title or leasehold title registered with good leasehold title (where the lease has at least 60 (sixty) years unexpired duration) and in each case defective title indemnity insurance in favour of the Grant Recipient with a limit of indemnity to at least the Named Project Grant for that Site;

which if a lease, has the Minimum Duration; or

(d) a binding contract with the owner of the legal and beneficial interest in the Site to secure one of the interests in limbs (a) to (c) above and that securing that interest is conditional only upon the matters that are within the direct and unilateral control of the Grant Recipient;

Secure Legal Interest (Short Term) means the Grant Recipient has in respect of the Site:

(a) a leasehold title where the lease has less than sixty (60) but more than thirty (30) years unexpired duration, registered with title absolute or registered with good leasehold title and in the latter case defective title indemnity insurance in favour of the Grant Recipient with a limit of indemnity to at least the Named Project Grant for that Site; or

(b) where expressly agreed by the GLA in the Named Project Details a lease of:

i between seven (7) and 30 (thirty) years unexpired duration, registered with title absolute or registered with good leasehold title and in the latter case defective title indemnity insurance in favour of the Grant Recipient with a limit of indemnity to at least the Named Project Grant for that Site;

ii between five (5) and seven (7) years unexpired duration in the Named Project Details,

in all cases where the relevant lease has the Minimum Duration; or

(c) a binding contract with the owner of the legal and beneficial interest in the Site to secure one of the interests in limbs (a) or (b) above and that securing that interest is conditional only upon the matters that are within the direct and unilateral control of the Grant Recipient;

SHAP means the GLA's Single Homelessness Accommodation Programme as described in the Bidding Prospectus and any updates published or issued from time to time in relation thereto;

SHAP Dwelling means:

(a) a house, flat or maisonette; or

(b) where expressly agreed by the GLA on OPS, Shared Accommodation;

which was Delivered with the benefit of grant payable under this Agreement and as more particularly described in the Named Project Details;

SHAP Housing means subsidised housing provided by the Grant Recipient pursuant to this Agreement that will be made available to individuals within the Programme Client Group at either a:

(a) Affordable Rent; or

(b) Social Rent;

SHAP Minimum Standards means in respect of each Named Project the:

(a) Minimum Building Safety Standards;

(b) Minimum Property Standards (to the extent these are not comprised in the above limb (a));

(c) Decent Homes Standard; and

(d) Certified Standards,

subject to any exemptions approved by GLA (in its absolute discretion) and recorded on OPS;

SHAP Support Guidelines means the publication entitled "Single Homelessness Accommodation Programme Support Guidelines" issued by the GLA in December 2022 (as updated, amended or replaced from time to time) published at https://www.london.gov.uk/media/99697/download?attachment;

Shared Accommodation means a dwelling (including any common areas) comprised within non-self-contained accommodation for two (2) or more households;

Short Lease means a lease of less than seven (7) years duration made between the Grant Recipient and a third party;

Site means the site identified to the GLA as being the area of land or buildings comprised or to be comprised in a Named Project and/or the SHAP Dwellings and common areas Delivered as part of such Named Project;

Sleeping Rough means the relevant individual is sleeping outside (including bedding down for the night on the street) or sleeping in a non-residential building or other location not designed for human habitation;

Social Housing Remodelling or Refurbishment Project has the meaning ascribed to it in the Agreed Principles;

Social Rent means a rent calculated in accordance with the formula and related provisions for calculating social rents set out in the Rent Standard;

SoS Year has the meaning attributed to it in limb (a) of the definition of Indicative Projects;

Special Conditions means the conditions set out in Schedule 2;

Start on Site means the occurrence of:

(a) with respect to a New Build Project or a Social Housing Remodelling or Refurbishment Project, all of the following:

i either:

A the Grant Recipient and Building Contractor have entered into the Building Contract and the Building Contractor has taken possession of the Site; or

B where the Works will be undertaken by the Grant Recipient, a purchase order has been raised with respect to the Works and the Grant Recipient has taken possession of the Site; and

ii the Start on Site Works have commenced;

(b) with respect to an Acquisition (No Work Required) Project or Acquisition (Work Required) Project, the acquisition of a Completed Interest in the Site;

Start on Site Date means the date identified on OPS on which Start on Site is projected to occur and does occur;

Start on Site Tranche Grant means subject to Condition 7.6 such sum as is equivalent to the percentage of the Named Project Grant recorded on and agreed by GLA through OPS as payable when the Grant Recipient has achieved the Start on Site;

Start on Site Works means the commencement of the Works in relation to any SHAP Dwelling comprised in the relevant Named Project including:

(a) in the case of a New Build Project:

i the digging of a trench which is to contain the foundations, or part of the foundations, of such dwelling;

ii the laying of any underground main or pipe to the foundations, or part of the foundations, of such dwelling or to any such trench as per (a) above;

iii any operation in the course of laying out or constructing a road or part of a road; or

iv such works of demolition or service diversion as are set out in Section 2 Affordable Housing Capital Funding Guide; or

(b) in the case of a Social Housing Remodelling or Refurbishment Project, the substantive commencement of physical Works to the Site;

Subcontractor means any subcontractor appointed by the Grant Recipient to undertake all or part of the Grant Recipient's obligations under this Agreement;

Subsidy means any direct or indirect financial assistance which:

(a) arises from the resources of the United Kingdom Government, devolved government, other public authority in the United Kingdom or an emanation of any of these, including:

i a direct or contingent transfer of funds such as direct grants, loans or loan guarantees;

ii the forgoing of revenue that is otherwise due;

iii the provision of goods or services, or the purchase of goods or services; or

iv a measure analogous to these,

(b) confers an economic advantage on one or more Enterprises;

(c) is specific insofar as it benefits, as a matter of law or fact, certain Enterprises over others in relation to the production of certain goods or services; and

(d) has, or could have, an effect on trade or investment between the United Kingdom and any part of the European Economic Area and/or any other country or countries which the United Kingdom has entered into a trade agreement with which has provisions in respect of public sector funding arrangements;

Subsidy Control Requirements means all Legislation and/or regulations and/or guidance issued by the Secretary of State and/or approved by Parliament which is in force and/or applies in England which regulates Subsidy and applies to the Named Project Grant and any other Public Sector Funding, including (but not limited to):

(a) the terms of the Trade and Cooperation Agreement between the European Union, European Atomic Energy Community and the United Kingdom of Great Britain and Northern Ireland to the extent they are applicable in England;

(b) European Union (Withdrawal Agreement) Act 2020;

(c) European Union (Future Relationship) Act 2020; and

(d) Subsidy Control Act 2022;

Substitute Dwelling means a dwelling proposed by the Grant Recipient pursuant to Condition 16 in substitution for a SHAP Dwelling;

Substitute Dwelling Acceptance Date means the date upon which the GLA accepts a Substitute Dwelling pursuant to Condition 16.3;

Substitute Dwelling Details means such details of a Proposed Substitute Dwelling as the GLA may request (acting reasonably) including at minimum the address of the Proposed Substitute Dwelling and the date that such dwelling is proposed to be substituted for the Original Dwelling;

Target Client Group (Initial) means individuals from any of the following groups:

(a) Rough Sleepers;

(b) Vulnerable Young Person;

that have been nominated as a Tenant by the relevant Nominating Body;

Target Client Group (Homelessness) means individuals from such homeless client groups as are agreed by the GLA pursuant to Condition 4.6.1 and have (unless otherwise expressly agreed by the GLA) been nominated as a Tenant by the relevant Nominating Body;

TCPA means the Town and Country Planning Act 1990;

Tenancy Standard means the tenancy standard published by the Regulator from time to time pursuant to its power under Section 193 of the HRA 2008;

Tenancy Support Notification Date means the date on which the Grant Recipient notifies the GLA in accordance with Condition 4.3.1;

Tenancy Support Service Agreement means an agreement entered into between the Grant Recipient and the Tenancy Support Services Provider for the provision of the Tenancy Support Services;

Tenancy Support Services means the support services to be provided to Tenants of the SHAP Dwellings in a Named Project as set out in the Named Project Details;

Tenancy Support Services Provider means the organisation providing the Tenancy Support Services;

Tenancy Support SLA means either:

(a) a Tenancy Support Service Agreement; or

(b) where the GLA has provided prior agreement pursuant to Condition 4.7.1 a Tenancy Support Specification;

Tenancy Support Specification means a written specification which:

(a) identifies the delivery model and standards it will apply in respect of the Tenancy Support Services; and

(b) describes how the Grant Recipient will effectively manage the provision of the Tenancy Support Services within its organisation;

Tenancy Term means the term of the relevant tenure agreed by the GLA on OPS for each SHAP Dwelling;

Tenancy Type means either:

(a) a non-secure tenancy as defined in section 79(2)(a) and Schedule 1 paragraphs (4), (4A), and/or (6) Housing Act 1985; or

(b) where agreed by the GLA on OPS:

i an introductory tenancy, as defined in section 124 Housing Act 1996;

i a contractual license or contractual tenancy; or

ii such other form of tenancy expressly agreed by the GLA;

as accepted by the GLA on OPS for each SHAP Dwelling in a Named Project and set out in the Named Project Details;

Tenant means (as the context requires):

(a) a tenant or licensee occupying a SHAP Dwelling; or

(b) a prospective tenant or licensee of a SHAP Dwelling;

Total Scheme Costs means in respect of a Named Project the sum recorded in OPS against the "Total Scheme Costs" line entry in the "Summary" section of the Named Project Details as at the Acceptance Date or the Additional Project Acceptance Date (as applicable) being the anticipated Project Costs to be incurred by the Grant Recipient;

Total Termination Event means this Agreement is or could be terminated as a whole pursuant to Condition 5.4.1;

Tranche means in respect of a Named Project and as applicable any of the Acquisition Tranche Grant, Start on Site Tranche Grant, Completion Tranche Grant or any additional tranche approved by the GLA pursuant to Condition 7.7;

Transparency Commitment means the GLA's commitment to publishing its agreements, contracts, tender documents and data from invoices and claims received in accordance with the Local Government Transparency Code 2015 and the GLA's Contracts and Funding Code;

UK GDPR has the meaning given to it in section 3(10) of the Data Protection Act 2018;

Unlawful Subsidy means Subsidy which has been granted, or from time to time is, in contravention of the Subsidy Control Requirements;

Updated Total Scheme Costs means in respect of a Named Project the Actual Project Costs incurred by the Grant Recipient as updated by the Grant Recipient on OPS pursuant to Condition 10.6 and notified to the GLA on OPS;

VAT means Value Added Tax as presently charged under the Value Added Tax Act 1994 or any tax of a similar nature;

Vulnerable Young Person means individuals who will be aged between 18 and 25 (inclusive) when they are granted a tenancy or licence of the relevant SHAP Dwelling by the Grant Recipient and who:

(a) in the reasonable opinion of the Grant Recipient are homeless or are Sleeping Rough or have demonstrable history of Sleeping Rough in the immediate past; or

(b) do not fall within limb (a) above but in the reasonable opinion of the Grant Recipient are Insecurely Housed,

and in the Grant Recipient's reasonable opinion require support services to maintain an independent and settled lifestyle;

Waiver Condition means provision of satisfactory evidence by the Grant Recipient to the GLA that the relevant Prohibited Act was committed by:

(a) an employee acting independently of the Grant Recipient; or

(b) a subcontractor (or any employee of a subcontractor not acting independently of the subcontractor); or

(c) an employee of a subcontractor acting independently of such subcontractor; or

(d) any person not specified in parts (a), (b) or (c);

and the GLA is satisfied that the Grant Recipient and/or the subcontractor (as applicable) has taken such action as is appropriate taking in to account the nature and the circumstances of the relevant Prohibited Act. **Acting independently** for these purposes means not acting with the authority or knowledge of any one or more of the directors of the Grant Recipient or relevant subcontractor;

Withholding Event means an event or circumstance of the type described in Condition 13.1; and

Works means in relation to each applicable Named Project all of the works (including design, infrastructure works and all other works necessary for obtaining access to each SHAP Dwelling) to be undertaken in order to ensure that the SHAP Dwellings comprised in a Named Project meet the SHAP Minimum Standards and are Delivered in accordance with the Named Project Details.

1.2 **Interpretation**

1.2.1 Words denoting any gender include all other genders.

1.2.2 The singular includes the plural and vice versa.

1.2.3 Any reference in this Agreement to any condition, sub-condition, paragraph, schedule or section heading is, except where it is expressly stated to the contrary, a reference to such condition, sub-condition, paragraph, schedule or section heading of this Agreement.

1.2.4 Any reference to this Agreement or to any other document shall include (except where expressly stated otherwise) any variation, amendment or supplement to such document to the extent that such variation, amendment or supplement is not prohibited under the terms of this Agreement.

1.2.5 Any reference to any enactment, order, regulation or similar instrument shall (except where expressly stated otherwise) be construed as a reference to the enactment, order, regulation or instrument as amended, replaced, consolidated or re-enacted.

1.2.6 A reference to a person includes firms, partnerships and corporate bodies and their successors and permitted assignees or transferees.

1.2.7 Headings are for convenience of reference only.

1.2.8 A party means a party to this Agreement.

1.2.9 The words includes or including are to be construed without limitation.

1.2.10 A paragraph in a Schedule shall be construed as references to a paragraph in that particular Schedule.

1.2.11 A deliberate act or omission of any person shall exclude acts or omissions which were within the contemplation of the parties or which were otherwise provided for in this Agreement.

1.2.12 In any case where the consent or approval of the GLA (or any officer of the GLA) is required or a notice is to be given by the GLA, such consent or approval or notice shall only be validly given if it is in writing (including by email) and signed (or sent, if by email) by (if relevant) the officer stipulated in this Agreement or such other person as may be specified by the GLA by notice in writing to the Grant Recipient.

1.2.13 An obligation to do anything includes an obligation to procure its being done.

1.2.14 Any restriction includes an obligation not to permit infringement of the restriction.

1.2.15 The terms **Site, Indicative Project** and **Named Project** includes each and every part of it.

1.2.16 When there are two (2) or more persons affected by the obligations under this Agreement such obligations are to bind each such person jointly and severally.

1.2.17 Save where a contrary intention is shown, any reference to the GLA acting reasonably shall be interpreted as requiring the GLA to act in a commercially reasonable manner and any reference to the exercise of discretion by GLA shall be construed as permitting GLA to exercise its discretion freely and without constraint of any kind.

1.2.18 If there is any ambiguity or conflict between the implied terms and the express terms of this Agreement then the express terms shall prevail.

1.2.19 The Grant Recipient shall in relation to the delivery of its obligations under this Agreement be responsible as against the GLA for the acts or omissions of any Grant Recipient Party as if they were the acts or omissions of the Grant Recipient.

1.2.20 Neither the giving of any approval, consent, examination, acknowledgement, knowledge of the terms of any agreement or document nor the review of any document or course of action by or on behalf of the GLA shall, unless otherwise expressly stated in this Agreement or agreed in writing by the GLA, relieve the Grant Recipient of any of its obligations under this Agreement or of any duty which it may have hereunder to ensure the correctness, accuracy or suitability of the matter or thing which is the subject of the approval, consent, examination, acknowledgement or knowledge nor confer impose or imply any liability or responsibility on or on behalf of the GLA in respect of or in connection with the matter to or in relation to which such approval consent examination acknowledgement was given or review made.

1.2.21 The terms "Allocated Grant", "Capital Grant" and "Named Project Grant" (unless the context precludes such interpretation) include every Tranche thereof.

1.2.22 Any reference to Section 8 Affordable Housing Capital Funding Guide in this Agreement refers to the section entitled "Resident Ballots for Estate Regeneration Projects" of such guide (and any successor, replacement or amendment of the same).

1.2.23 Any reference to a Section and/or a Chapter of the Affordable Housing Capital Funding Guide in this Agreement shall refer to any successor, replacement or amendment of such Section or Chapter from time to time.

1.2.24 Any terms used in the definition of "Subsidy" shall, unless the context requires otherwise, be construed as having the meaning given to them in the Subsidy Control Requirements.

1.2.25 In the event of any conflict between the information in the Approved Bid and the Named Project Details described in OPS, the Named Project Details shall prevail.

1.2.26 The use of the term "let" or "letting" in this Agreement shall be construed as including the grant or granting of licence.

2 **Purpose and acknowledgements**

2.1 In consideration of the sum of £1 (receipt of which the GLA hereby acknowledges), the GLA has agreed to make the Allocated Grant available to the Grant Recipient to provide the SHAP Dwellings for the Agreed Purposes subject to and in accordance with the terms and conditions of this Agreement.

2.2 The Grant Recipient acknowledges and agrees that:

2.2.1 the Allocated Grant is being made available by the GLA on the express understanding that it is applied solely for the purposes of funding the Project Costs in respect of SHAP Dwellings comprised in a Named Project which are to be let to individuals within the Programme Client Group who have been nominated in accordance with the terms of this Agreement;

2.2.2 the Public Sector Funding in respect of a Named Project may not exceed an amount equal to the Actual Project Cost nor may the Public Sector Funding in respect of the Approved Bid exceed an amount equal to the aggregated Actual Project Costs incurred in respect of the delivery of the Approved Bid;

2.2.3 all funding under this Agreement is:

(a) social housing assistance as defined in Section 32(13) of the HRA 2008; and

(b) subject to the provisions of Sections 30, 34 and 333ZE of the Greater London Authority Act 1999 and any determinations made under such provisions and the provisions of Condition 14 represent the events and principles determined by the GLA for the purposes of Sections 31-34 of the HRA 2008;

2.2.4 the Grant Recipient must hold Registered Provider status at the point at which the SHAP Dwelling(s) comprised within each Named Project are made available for rent;

2.2.5 the provisions of this Agreement represent the conditions upon which the GLA makes the Allocated Grant available to the Grant Recipient for the purposes of section 19 and 31 of the HRA 2008 and any failure by the Grant Recipient to comply with the terms of this Agreement or the occurrence of a Default Event or Withholding Event constitutes a failure to comply with a condition attached to the making of Capital Grant for the purposes of paragraph 8(e) of the Recovery Determination (or any successor provision to that paragraph); and

2.2.6 without prejudice to any other terms of this Agreement:

(a) the period that each SHAP Dwelling comprised in the Named Project is let to individuals within the Programme Client Group for the Agreed SHAP Purposes must equal or exceed the Minimum Period of Use;

(b) the aggregate of the Acquisition Tranche Grant, Start on Site Tranche Grant, the Completion Tranche Grant and any other tranche approved by GLA (having regard to Condition 7.7) in each Named Project will represent one hundred per centum (100%) of the Named Project Grant.

(c) the terms of the Affordable Housing Capital Funding Guide are incorporated within this Agreement (mutatis mutandis); and

(d) the Grant Recipient must not advance or on-lend any Named Project Grant to a third party (in whole or in part).

2.3 The Grant Recipient shall comply with the Open Book Obligations.

2.4 The parties acknowledge that in setting the Affordable Rent Level, it may not be possible for the Grant Recipient to identify a comparable market rent for an equivalent property of the relevant size and location (an **Equivalent Property**) in the Broad Market Rental Area. In such a case the Grant Recipient will submit to the GLA a comparable market rent based on Equivalent Properties in alternative comparator areas (the **Alternative Market Rent**). If the GLA (acting reasonably) does not approve the Grant Recipient's proposed Alternative Market Rent, the Grant Recipient will engage a valuer to identify a comparable market rent from areas outside the Broad Market Rental Area and determine the market rent that will be applicable to the SHAP Dwelling in the Broad Market Rental Area (the **Comparable Market Rent**). In the circumstance contemplated in this Condition 2.4 the Grant Recipient should set the Affordable Rent Level by reference to the Comparable Market Rent.

2.5 Each party undertakes to co-operate with the other to facilitate the proper performance of this Agreement and the delivery of the Named Projects.

2.6 The Grant Recipient expressly acknowledges the Agreed Principles and agrees to observe, be bound by and interpret its obligations in this Agreement in consideration of them.

3 **Monitoring and Reporting**

3.1 The Grant Recipient acknowledges the high importance to the GLA of it being advised when any circumstance occurs which may:

3.1.1 impact on the Grant Recipient's ability:

(a) achieve the Milestones by the Milestone Dates; or

(b) otherwise deliver any Indicative Project or Named Project in accordance with the terms of this Agreement;

3.1.2 change any assumptions in relation to any Named Project which would provide an opportunity for the Grant Recipient to deliver more SHAP Dwellings with the Allocated Grant;

3.1.3 indicate that the GLA is making available more grant than is required to deliver a Named Project;

3.1.4 impact upon the availability of any SHAP Dwellings and/or achievement of the Minimum Period of Use;

3.1.5 constitute a Default Event or a Withholding Event; or

3.1.6 give rise to the making of a Section 114 Report or the issue of a Section 15 Direction

(collectively the **Contract Monitoring Outputs**).

3.2 The Grant Recipient shall comply fully with the contract management and reporting obligations set out in this Condition 3.

3.3 The GLA and the Grant Recipient shall attend a Review Meeting within ten (10) Business Days of each Quarter Date within the Delivery Period (or within such longer period as the GLA may at its absolute discretion agree) to discuss (but without limitation):

3.3.1 the Grant Recipient's performance against the information contained in the Named Project Details and any matters which may adversely impact on the Grant Recipient's performance against the same;

3.3.2 progress updates in relation to each Indicative Project and Named Project including delivery forecasts, progress against previously given delivery forecasts, lettings forecasts and progress against previously given lettings forecasts;

3.3.3 the occurrence of any Milestone Extension Event in respect of any Named Project;

3.3.4 the Contract Monitoring Outputs;

3.3.5 the information supplied pursuant to the Open Book Obligations;

3.3.6 the operation of the Nominations Agreements and Nomination Details (including the Grant Recipient's compliance with such) and any requested changes to the Project Client Group;

3.3.7 any SHAP Dwellings which have or will become unavailable for occupation either permanently or for a continuous period of two (2) weeks or more;

3.3.8 the Tenancy Support Services;

3.3.9 any SHAP Dwellings scheduled to achieve Dwelling Completion within the upcoming three (3) months;

3.3.10 any anticipated reductions in Total Scheme Costs;

3.3.11 any circumstances which could impact on the Grant Recipient's ability to use any SHAP Dwelling for the Agreed SHAP Purposes; and

3.3.12 such other matters in relation to the performance of this Agreement as are notified by either party to the other in writing at least five (5) Business Days prior to the date of the Review Meeting.

3.4 The GLA or the Grant Recipient may also call a Review Meeting at any time outside of the quarterly cycle provided that the party requesting the meeting:

3.4.1 gives reasonable prior written notice to the other of such meeting; and

3.4.2 includes with the notice an agenda for such meeting.

3.5 The GLA's Representative and the Grant Recipient's Representative (or, where agreed with the GLA in advance, such other member of the Grant Recipient's executive management team) shall attend all Review Meetings during the term of this Agreement or for such longer period as the GLA (acting reasonably) requires.

3.6 Save as otherwise agreed between the parties, any meeting under this Condition 3 shall be minuted by the Grant Recipient and such minutes shall be distributed within ten (10) Business Days following the meeting to the GLA and any other attendee.

3.7 The Grant Recipient shall provide the GLA as soon as reasonably practicable with such information as the GLA shall reasonably require to support or facilitate the discussions referred to in this Condition 3 and shall use all reasonable endeavours to ensure the accuracy of any information provided.

3.8 The Grant Recipient shall promptly:

3.8.1 participate in any monitoring and/or evaluation of the SHAP that DLUHC or the GLA or its or their agents may require from time to time; and

3.8.2 supply (subject always to its data protection obligations under Condition 35) any information or data requested by DLUHC, the GLA or its or their agents in respect of any such monitoring and/or evaluation, which may include information/data pertaining to any SHAP Dwellings (including, inter alia, addresses and tenures of such dwellings); and

3.8.3 accurately update OPS with such information as may be requested by the GLA from time to time (acting reasonably) in connection with such monitoring and/or evaluation and/or the terms of this Agreement.

3.9 During the Delivery Period the Grant Recipient shall:

3.9.1 review the Named Project Details and details of any Indicative Project (including for the avoidance of doubt any Milestones or Milestone Dates) regularly (and at least each month) and promptly and accurately update any such details which have changed or become out of date;

3.9.2 promptly provide the GLA with:

(a) such information as the GLA shall reasonably require regarding the length and nature of the Secure Legal Interest which the Grant Recipient possesses or will possess;

(b) a copy of the Tenancy Support SLA currently in place; and

(c) such evidence as the GLA may reasonably require in order to determine whether any Tenant meets the relevant criteria for the applicable Project Client Group.

3.10 The parties acknowledge and agree that GLA may from time to time review whether the Grant Recipient continues to meet the requirements for Investment Partner status and the Grant Recipient will co-operate with such review and will provide GLA with such further information, evidence and/or explanation with respect to any such review as GLA may request.

4 **Tenancy Support**

4.1 The parties acknowledge and agree that:

4.1.1 the Tenancy Support Services Provider shall provide the Tenancy Support Services as set out in OPS and on the basis set out under this Agreement; and

4.1.2 where the GLA (acting reasonably) considers that a change in the Tenancy Support Services Provider or entry into a proposed Alternative Tenancy Support SLA will have a Material Adverse Effect upon the provision of the Tenancy Support Services it shall be entitled to treat this as a Default Event pursuant to Condition 5.1.16.

4.2 The Grant Recipient shall ensure that:

4.2.1 a Tenancy Support SLA is in place no less than six (6) weeks (or such shorter period where agreed by the GLA in its absolute discretion) prior to the Named Project in which the relevant SHAP Dwelling is comprised achieving Dwelling Completion and that such Tenancy Support SLA is effective and continues to apply to any Tenant occupying the SHAP Dwelling after it is First Let;

4.2.2 it complies with (and where relevant ensures that the Tenancy Support Services Provider complies with) the SHAP Support Guidelines;

4.2.3 it complies with (and where relevant ensures that the Tenancy Support Services Provider complies with) the terms of any Tenancy Support SLA, the Nominations Agreement and Nomination Details;

4.2.4 it notifies the GLA on OPS at least 30 (thirty) Business Days in advance of any change in the Tenancy Support Services Provider (and contemporaneously provides the GLA with any proposed form of Alternative Tenancy Support SLA) and where such a change is approved by the GLA it shall be implemented in accordance with Condition 9;

4.2.5 if the Tenancy Support Services Provider changes, it requires the outgoing provider to co-operate with the new provider (if a separate entity) and the provision of the Tenancy Support Services remains continuous;

4.3 Where the Grant Recipient becomes aware that Tenancy Support Services are likely to come to an end for any SHAP Dwelling the Grant Recipient must:

4.3.1 notify the GLA in writing 12 (twelve) months before the end date of the Tenancy Support Services; and

4.3.2 use reasonable endeavours to secure additional revenue funding for the provision of Tenancy Support Services for the relevant SHAP Dwelling(s) (if applicable).

4.4 Where, during the Minimum Period of Use, Tenancy Support Services for any SHAP Dwelling are projected to cease and/or no commitment for additional revenue funding can be secured by the Grant Recipient in accordance with Condition 4.3.2, the parties will (subject to Condition 4.5) within 90 (ninety) Business Days (or such later date as GLA may agree in its absolute discretion) of the Tenancy Support Notification Date seek to agree an alternative arrangement in relation to the revenue funding position, any Target Client Group (Homelessness) that the Grant Recipient proposes to accommodate and/or an alternative usage in respect of the relevant SHAP Dwelling(s) (an **Alternative Purpose**).

4.5 The parties acknowledge and agree that where:

4.5.1 during the Initial Period the Tenancy Support Services cease and/or the Target Client Group (Initial) is no longer accommodated within a SHAP Dwelling, the GLA may determine that there has been a Minimum Period of Use Breach without seeking to agree an Alternative Purpose; and

4.5.2 the GLA proposes to consider an Alternative Purpose the Grant Recipient must promptly co-operate with the GLA including with any request for:

(a) further details of any proposed Target Client Group (Homelessness) that the Grant Recipient believes (acting reasonably) it could accommodate in the relevant SHAP Dwelling and/or for any other information or evidence that the GLA may reasonably require (including any proposal to remedy or mitigate the effects of the potential Minimum Period of Use Breach);

(b) the Grant Recipient and (where requested by the GLA) any previous or incoming Tenancy Support Services Provider to attend any meetings with the GLA.

4.6 The parties acknowledge and agree that where:

4.6.1 within any timeframe determined by the GLA pursuant to Condition 4.4, an Alternative Purpose is agreed between the parties the Grant Recipient shall, as required by the GLA, amend the Named Project Details on OPS and/or document and effect such agreed Alternative Purposes by such other means as the GLA may determine and from the date that any such details are accepted by the GLA on OPS or by such other means (as applicable):

(a) the Agreed SHAP Purposes for the relevant SHAP Dwelling(s) shall be deemed to be amended to the extent necessary to reflect the Alternative Purposes agreed by the GLA; and

(b) the Grant Recipient shall be entitled to use the SHAP Dwelling to accommodate individuals from the Target Client Group (Initial) or any agreed Target Client Group (Homelessness);

4.6.2 no Alternative Purpose can be agreed in any timeframe determined by the GLA pursuant to Condition 4.4 or the Grant Recipient fails to comply with Conditions 4.3 to 4.7 (inclusive), a Minimum Period of Use Breach shall be deemed to have occurred and the provisions of Condition 5.1.21(a) shall apply.

4.7 The parties acknowledge and agree that:

4.7.1 a Tenancy Support Specification may only be used in lieu of a Tenancy Support Service Agreement where the Grant Recipient is providing the Tenancy Support Services to the Tenants of the relevant SHAP Dwellings;

4.7.2 nominations to SHAP Dwellings may only be made by an Alternative Nominating Body where this has been agreed in advance by the GLA (in its absolute discretion) on OPS; and

4.7.3 after the expiry of the Minimum Period of Use:

(a) each SHAP Dwelling may be used to accommodate persons from either the Programme Client Group or general needs tenants;

(b) the Agreed SHAP Purposes shall be deemed to be replaced by the Agreed Long Term Purposes; and

(c) the terms of this Agreement will continue to apply save that any changes necessary to reflect Condition 4.7.3(b) coming into effect shall be deemed to be made (mutatis mutandis).

5 **Default Events**

5.1 The following circumstances shall constitute a Default Event:

5.1.1 failure by the Grant Recipient to comply with its obligations in Condition 3, Condition 8.5 or Condition 12 and/or any information supplied in connection with its obligations in Condition 3, Condition 8.5 or Condition 12, whether in relation to the Contract Monitoring Outputs or otherwise is materially deficient, misleading or inaccurate;

5.1.2 the Grant Recipient is unable to make the representations and give the warranties set out in this Agreement (in any case in whole or in part) and there is a resulting Material Adverse Effect in relation to:

(a) the Approved Bid; or

(b) a Named Project;

5.1.3 the Grant Recipient is subject to a Section 15 Direction or a Section 114 Report which has or will have a Material Adverse Effect;

5.1.4 a Prohibited Act has been committed by or on behalf of the Grant Recipient (in respect of which the Waiver Condition has not been satisfied);

5.1.5 a breach of the Open Book Obligations;

5.1.6 the GLA determines (acting reasonably) that proper progress against the Grant Recipient's projections in the Approved Bid has not been made by the Grant Recipient in delivering the Approved Bid;

5.1.7 the Grant Recipient ceases operating;

5.1.8 the Grant Recipient's status as a Registered Provider is lost, relinquished or removed;

5.1.9 the Grant Recipient's Investment Partner status is lost or removed in its entirety;

5.1.10 the Regulator directs or recommends that grant is not to be paid to the Grant Recipient or the GLA understands that such a direction or recommendation is likely to be made;

5.1.11 a breach of Condition 8 (other than Condition 8.5) or a breach of the SHAP Minimum Standards in respect of a Named Project;

5.1.12 a failure or inability by the Grant Recipient to comply with:

(a) the requirements of Condition 10; or

(b) any obligation to pay or repay any amounts due under this Agreement;

5.1.13 any other breach of the Agreement which has a Material Adverse Effect;

5.1.14 the Grant Recipient (either by its own actions or omissions, or those of its contractors or agents) harms the GLA's, DLUHC's, the SHAP's or the Mayor of London's reputation or brings the GLA, DLUHC, the SHAP or the Mayor of London into disrepute;

5.1.15 a breach of Condition 4;

5.1.16 termination of or a material amendment to the Tenancy Support SLA during the Minimum Period of Use with respect to any SHAP Dwelling comprised in the Named Project, save where this is replaced by an Alternative Tenancy Support SLA or where the GLA agrees that the relevant Programme Client Group does not require a Tenancy Support SLA to be in place;

5.1.17 any of the following events or circumstances occur:

(a) a breach of the Estate Regeneration Requirement;

(b) the Grant Recipient has failed to comply with the Estate Regeneration Requirement in circumstances where in the GLA's reasonable opinion the Estate Regeneration Requirement ought to have been complied with (having regard to Section 8 Affordable Housing Capital Funding Guide);

(c) having regard to any planning permission obtained for the Site or reports issued to residents affected by the delivery of the Named Project, in the GLA's reasonable opinion, a breach of the Estate Regeneration Requirement is likely to occur; or

(d) in the GLA's opinion the Grant Recipient has partitioned the Site in order to avoid the application of the Resident Ballot Requirement;

5.1.18 the facts or circumstances upon which a Compliance Checklist or Exemption Certificate was provided (as applicable) change so that such certificate is no longer correct in all material respects;

5.1.19 an Exemption Certificate expires or is withdrawn by the GLA;

5.1.20 any Drawdown Condition is not satisfied within the relevant timescales required by the GLA (in its absolute discretion);

5.1.21 the occurrence of a Minimum Period of Use Breach which falls within the description set out in:

(a) limbs (a) or (b) of the definition of Minimum Period of Use Breach; or

(b) limb (c) of the definition of Minimum Period of Use Breach;

5.1.22 a breach of the Special Conditions;

5.1.23 the Grant Recipient's Investment Partner status has been restricted such that it does not extend to the relevant Named Project.

5.2 The Grant Recipient must notify the GLA immediately in writing on the occurrence of a Default Event.

5.3 Without prejudice to Condition 5.4, in the event of the occurrence of a Default Event and for so long as that Default Event subsists (or another Default Event has occurred and is continuing) the GLA shall be entitled to reject the submission of any New Named Project, Additional Project or Substitute Dwelling on OPS.

5.4 Where the Default Event is:

5.4.1 an occurrence specified in Conditions 5.1.3, 5.1.4, 5.1.7, 5.1.8 , 5.1.9 and/ or 5.1.14 the GLA shall be entitled forthwith and without any liability to the Grant Recipient terminate the Agreement;

5.4.2 an occurrence specified in Conditions 5.1.1, 5.1.2(a), 5.1.5, 5.1.6, 5.1.10, 5.1.11, 5.1.12, 5.1.13, 5.1.15, 5.1.17 to 5.1.20 (inclusive) and/or 5.1.22 the GLA may serve notice on the Grant Recipient requiring the Grant Recipient to remedy the breach or failure and if within a period of 30 (thirty) Business Days following service of such notice:

(a) the breach or failure has not been remedied;

(b) where so permitted by the GLA the Grant Recipient has not given an undertaking to remedy the breach on terms satisfactory to the GLA; or

(c) if it becomes apparent that the Default Event is incapable of remedy either within such period or at all,

the GLA shall be entitled on giving not less than ten (10) Business Days' notice and without any liability to the Grant Recipient but without determining the whole of this Agreement to terminate this Agreement insofar as it relates to the Named Project to which the Default Event relates;

5.4.3 an occurrence specified in Condition 5.1.2(b), 5.1.23 and/or Condition 14.3.4(d) the GLA shall be entitled forthwith and without any liability to the Grant Recipient but without determining the whole of this Agreement terminate the Agreement insofar as it relates to the Named Project to which the relevant Default Event relates;

5.4.4 an occurrence specified in Conditions 5.1.16 or 5.1.21(b) the GLA may serve notice on the Grant Recipient requiring the Grant Recipient to remedy or mitigate the effects of the Default Event and if within a period of 30 (thirty) Business Days following service of such notice:

(a) the breach or failure has not been remedied;

(b) where so permitted by the GLA the Grant Recipient has not given an undertaking to remedy or mitigate the effects of the breach on terms satisfactory to the GLA; or

(c) if it becomes apparent that the Default Event is incapable of remedy either within such period or at all,

the GLA shall be entitled on giving not less than ten (10) Business Days' notice and without any liability to the Grant Recipient but without determining the whole of this Agreement terminate the Agreement insofar as it relates to the SHAP Dwelling(s) which is the subject of the Default Event.

5.4.5 an occurrence specified in Condition 5.1.21(a) the GLA shall be entitled forthwith and without any liability to the Grant Recipient but without determining the whole of this Agreement terminate the Agreement insofar as it relates to the SHAP Dwelling which is the subject of the Default Event.

5.5 Where the GLA purports to terminate this Agreement in accordance with this Condition 5 and the Grant Recipient disputes its entitlement to do so the provisions of Condition 28 shall apply.

6 **Indicative Projects**

6.1 The Grant Recipient confirms that such details of the Indicative Projects comprised in the Original Approved Bid as are required by the GLA have been included in OPS by the date of this Agreement.

6.2 If the Indicative Projects are accepted by the GLA in OPS (pursuant to Condition 19.3.1 or otherwise) the Grant Recipient acknowledges that the terms of this Condition 6 apply from the date of that acceptance.

6.3 The Grant Recipient must ensure that the Indicative Projects are worked up so that the Committed Number of Indicative Dwellings are:

6.3.1 profiled into Named Projects on OPS in accordance with the procedures set out in Condition 7.1;

6.3.2 achieve Start on Site in the relevant SoS Year; and

6.3.3 achieve Completion in the relevant Completion Year.

6.4 If the Grant Recipient fails to comply with its obligations in Condition 6.3 the GLA shall be entitled to reduce the Indicative Allocation by the Reduction Amount and shall have no further obligation to the Grant Recipient in relation to any Non-Compliant Dwellings whether profiled into a Named Project or otherwise.

6.5 Any reduction in the Indicative Allocation will result in a commensurate reduction in the Allocated Grant.

6.6 Once an Indicative Project has been profiled into a Named Project on OPS in accordance with Condition 7.3, the Indicative Allocation shall, notwithstanding the quantum of the Indicative Allocation which appears on OPS, be deemed to be reduced by an amount equal to the Named Project Grant allocated to that Named Project.

7 **Named Projects – Submission Procedures**

7.1 Where the Grant Recipient identifies a New Named Project, it must give to the GLA such details as the GLA may require, including any proposed Named Project Details required by OPS in respect of the New Named Project

7.2 In submitting the details of each New Named Project, the Grant Recipient is deemed to represent and warrant to the GLA that:

7.2.1 such project:

(a) is consistent with the Approved Bid;

(b) is or will at the point of Completion be compliant with the SHAP Minimum Standards;

(c) is in its opinion (acting reasonably) deliverable in accordance with the Named Project Delivery Timetable;

(d) comprises no Public Sector Funding beyond that identified in the Named Project Details;

(e) will comprise no dwellings which have not been acquired, developed, converted, refurbished, repaired, Rehabilitated or designed for use by persons which meet the description in the Target Client Group (Initial);

7.2.2 the Grant Recipient:

(a) possesses or will possess a Secure Legal Interest;

(b) has obtained all Consents necessary for the lawful Delivery of the Named Project to the SHAP Minimum Standards and in accordance with the Named Project Details (as are then required);

(c) has complied with all applicable requirements of the Affordable Housing Capital Funding Guide in relation to the Named Project;

(d) is not subject to any Section 15 Direction nor do any circumstances exist which would permit such a direction to be issued; and

(e) has not nor have any of its officers made a Section 114 Report nor is it aware of any circumstances which would give rise to the making of a Section 114 Report;

7.2.3 the initial rent and service charge level for any SHAP Dwelling shall be set at or below the level set out in the Named Project Details;

7.3 If the GLA:

7.3.1 (acting reasonably) is satisfied with the details submitted under Condition 7.1;

7.3.2 considers that the New Named Project is consistent with the Approved Bid (including the project cost information and information in relation to the level of the Grant Recipient's contribution),

7.3.3 where relevant, is satisfied that the Grant Recipient has fulfilled or will fulfil any Drawdown Condition in the timescales required by the GLA;

7.3.4 is satisfied (in its absolute discretion) that the New Named Project will achieve (as applicable) Acquisition by the Acquisition Date, Start on Site by the Start on Site Date and Completion by the Named Project Completion Date,

it will, subject to Condition 5.3, confirm its acceptance of the New Named Project to the Grant Recipient through OPS.

7.4 With effect from the Acceptance Date, the New Named Project shall constitute a Named Project and shall be subject to the whole terms and conditions of this Agreement.

7.5 The GLA has no obligation to make any payment of grant in respect of a Named Project unless and until it has confirmed its acceptance of it in the manner described in Condition 7.3.

7.6 The GLA may at its absolute discretion vary the percentages attributed to Acquisition Tranche Grant, Start on Site Tranche Grant and Completion Tranche Grant from time to time save that, subject to Condition 7.7 and Condition 11.3, no such variation will take effect in relation to any Tranche that has already been paid.

7.7 In exceptional circumstances, the GLA may consider providing an additional tranche of funding for a Named Project outside of the Acquisition Tranche Grant, Start on Site Tranche Grant and Completion Tranche Grant. In allowing the Grant Recipient to claim an additional tranche (which shall be in GLA's absolute discretion), the GLA shall be entitled to require as a condition of such claim that the Grant Recipient makes such additional representations

and warranties as the GLA considers necessary or desirable. Any claim for additional tranche shall have due regard to Condition 2.2.6(b) and GLA's rights under Condition 7.6.

7.8 The Grant Recipient agrees that:

7.8.1 the amount of Named Project Grant may be revised by the GLA if the Updated Total Scheme Costs are less than the Total Scheme Costs;

7.8.2 in the circumstances contemplated in Condition 7.8.1 the Named Project Grant shall be reduced to the Revised Named Project Grant Sum; and

7.8.3 where the GLA has reduced the Named Project Grant to the Revised Named Project Grant Sum as a result of the circumstances set out in Condition 7.8.1 and Condition 7.8.2, the GLA shall be entitled to take the actions set out in Condition 11.3.

7.9 Under no circumstances shall the GLA be obliged to accept any New Named Project as a Named Project if the GLA (acting reasonably) believes that it does not, will not or is unlikely to have sufficient financial resources available to it (taking account inter alia of its commitments under the SHAP or other programme commitments) and to provide Named Project Grant in relation to the relevant project.

8 **Named Project Obligations**

8.1 The Grant Recipient must in relation to each Named Project:

8.1.1 carry out the acquisition of the Site and procure the completion of the Works (as applicable) so that:

(a) the Named Project is (subject to Condition 9.2) Delivered and made available for letting in accordance with the Named Project Delivery Timetable;

(b) when Delivered, the Named Project fully complies with the Named Project Details and meets the SHAP Minimum Standards;

(c) any applicable requirements of the London Plan are satisfied;

(d) any applicable requirements of Procurement Law and the Consents are complied with;

8.1.2 procure that prior to any SHAP Dwelling comprised in the relevant Named Project being occupied, any certifications required under any building safety Legislation arising out of the Building Safety Act 2022 in respect of the Named Project (or any part thereof) are obtained (including certification that the SHAP Dwelling has passed "Gateway 3" (or any similar or comparable stage in construction identified in any applicable Legislation);

8.1.3 procure that the Named Project complies with the Minimum Building Safety Standards in all respects and the parties acknowledge and agree that the GLA shall be under no obligation to provide any exemption in respect of the Minimum Building Safety Standards;

8.1.4 take such steps as are necessary to ensure (as far as practicable) the letting of the SHAP Dwellings to Eligible Tenants at the Named Project Completion Date (or as soon as reasonably possible thereafter); and

8.1.5 promptly notify the GLA in writing of any failure or likely failure to comply with Condition 8.1.

8.2 Where a Named Project is an Estate Regeneration Project the Grant Recipient must:

8.2.1 comply with the obligations set out in Section 8 Affordable Housing Capital Funding Guide; and

8.2.2 provide GLA with either:

(a) the Compliance Checklist, where the Resident Ballot Requirement applies; or

(b) in any other circumstances, the Exemption Certificate,

before any Tranche is claimed pursuant to Condition 10.1.

8.3 In delivering the Named Project and in operating and administering the Named Project after Completion, the Grant Recipient must: observe and comply with Legislation, the applicable terms of the Affordable Housing Capital Funding Guide, the Recovery Determination and the Consents.

8.4 The Grant Recipient shall procure that the GLA's Representative (or any person nominated by them) shall (subject to the terms of the occupier's tenancy agreement or licence) have at all reasonable times and upon giving reasonable notice the right to enter a SHAP Dwelling and to take such action as they consider appropriate to monitor compliance by the Grant Recipient with its obligations under this Agreement.

8.5 The Grant Recipient must notify the GLA in writing (save in respect of Conditions 8.5.1 and 8.5.2 , where notification is required to be given through OPS):

8.5.1 immediately once Acquisition, Start on Site and Completion has occurred with respect to each Named Project;

8.5.2 immediately, in the event of the receipt by it of any other Public Sector Funding or guarantees of it, or the offer of the same, in respect of a Named Project (or any part of it) beyond any amount of Public Sector Funding notified to the GLA by the Grant Recipient pursuant to Condition 7.2;

8.5.3 promptly of any Change in Control relating to the Grant Recipient which it anticipates will occur in the next following six month period;

8.5.4 immediately upon becoming aware of any event or circumstance which may have a Material Adverse Effect; and

8.5.5 of any other event or circumstance in relation to a Named Project as the GLA may reasonably require from time to time and within such timeframes as the GLA may reasonably require.

8.6 Without prejudice to Condition 8.3, the Grant Recipient must in operating and administering each Named Project after Completion:

8.6.1 not without the GLA's prior written consent (such consent to be given or withheld in the GLA's absolute discretion) use the SHAP Dwellings for any purpose other than the relevant Agreed Purposes;

8.6.2 subject to any contrary requirement of Legislation comply with the Rent Standard and the Tenancy Standard to the extent applicable to the SHAP Dwelling and with applicable Guidance;

8.6.3 not charge a higher initial rent or service charge in relation to a SHAP Dwelling than set out in the relevant Named Project Details and ensure that such rent and service charge is set and continues to be set and charged in accordance with the applicable criteria and requirements of the Rent Standard, applicable tenancy or licence and this Agreement;

8.6.4 ensure that the service charge set and/or charged in respect of each SHAP Dwelling:

(a) is reasonable and proportionate to the management services provided; and

(b) does not include the cost of the Tenancy Support Services provided to the Tenant of such dwelling.

8.6.5 comply at its own cost with the GLA's requirements in relation to Compliance Audit;

8.6.6 procure and comply with all necessary Consents relevant to the nature and operation of the SHAP Dwelling;

8.6.7 offer to each resident of the SHAP Dwellings a tenancy or licence which reflects the Tenancy Type for the Tenancy Term agreed with the GLA on OPS;

8.6.8 comply with the provisions of Condition 12; and

8.6.9 observe and comply with applicable requirements of the Affordable Housing Capital Funding Guide in relation to:

(a) the purpose, client group, letting, management and disposal of the SHAP Dwellings; and

(b) the nature of the housing and/or housing products (as described in the Affordable Housing Capital Funding Guide) being funded pursuant to this Agreement;

8.6.10 comply with (and where relevant ensure that the Tenancy Support Services Provider complies with) the terms any Tenancy Support SLA, the Nominations Agreements and the Nomination Details;

8.6.11 provide the GLA with Exemption Evidence prior to the relevant Nominating Body nominating an individual from the Project Client Group for accommodation into any Exempt Accommodation (where applicable);

8.6.12 where applicable, participate in the CORE system from time to time (including recording any lettings made);

8.6.13 ensure that where a Named Project is subject to the Resident Ballot Requirement, the proposals set out in the Landlord Offer are complied with; and

8.6.14 comply with any Legislation, instructions, direction, conditions, regulations and guidance issued by any Regulatory Body which are in force and apply in England in relation to building safety.

8.7 The Grant Recipient shall ensure that the GLA's requirements from time to time in relation to public relations and publicity for capital projects (including site signage) as notified to the Grant Recipient from time to time or otherwise as included in the Affordable Housing Capital Funding Guide are observed and implemented in respect of each Named Project.

8.8 In discharging its obligations under this Agreement or making any representation or warranty under this Agreement, the Grant Recipient must act at all times with the utmost good faith, with the intent to deliver the Approved Bid as appended to this Agreement and with proper regard to the need for efficiency in the use of public funds.

8.9 The Grant Recipient must comply with all applicable laws, statutes, regulations and codes relating to anti-bribery and anti-corruption including but not limited to the Bribery Act 2010 and comply with the GLA's anti-fraud and corruption policies, a copy of which is available here:https://www.london.gov.uk/about-us/governance-and-spending/good-governance/our-procedures, in each case as the GLA or the relevant industry body may update from time to time.

8.10 Where the Grant Recipient is aware that it is in breach of an obligation under this Condition 8 it must promptly notify the GLA of the fact and take all such steps as are appropriate in the circumstances to remedy the breach.

8.11 Notwithstanding any other provision of this Agreement the Grant Recipient shall, unless otherwise agreed by the GLA, remain liable and responsible for the performance of its obligations under this Agreement in relation to each SHAP Dwelling.

9 **Changes to Named Projects**

9.1 The parties may from time to time agree changes to the Named Project Details or the Indicative Projects and where such changes are agreed they shall be implemented by the Grant Recipient amending the Named Project Details or Indicative Projects in OPS and the electronic confirmation of that amendment by the GLA through OPS and in default of agreement the parties will be bound by the Named Project Details or Indicative Projects as they existed prior to the changes proposed under this Condition 9.1.

9.2 Where a Milestone Failure occurs or is in the opinion of the GLA reasonably likely to occur (having regard to any information provided pursuant to any of Conditions 3 or 8 or otherwise) and:

9.2.1 where such failure is directly caused by a Milestone Extension Event the GLA shall, subject always to Condition 9.4, extend the relevant Milestone Date and any subsequent Milestone Dates by such period as it (acting reasonably) considers appropriate to take account of the delay caused or likely to be caused by the Milestone Extension Event; or

9.2.2 where such failure is not directly caused by a Milestone Extension Event, the GLA shall notify the Grant Recipient of the Milestone Failure and the parties shall within 30 (thirty) Business Days of such notification seek to agree revised Milestone Dates and:

(a) where revised Milestone Dates are agreed within such period the Grant Recipient shall promptly amend the Milestone Dates in accordance with Condition 9.1; or

(b) where revised Milestone Dates are not agreed within such period the Milestone Failure shall be treated as a Default Event under Condition 5.1.11.

9.3 The GLA shall not be obliged to extend a Milestone Date:

9.3.1 unless a Milestone Extension Event exists; or

9.3.2 in circumstances where such extension would (when taken individually or together with other extensions in relation to the Grant Recipient) in the GLA's reasonable opinion materially and adversely affect the delivery of the Approved Bid or (when taken individually or together with other extensions allowed in relation to the Grant Recipient or other grant recipients of the SHAP or AHP 2021/26) materially and adversely affect the GLA's projected expenditure profile in relation to any year of the SHAP or AHP 2021/26 and in particular (but without limitation) such expenditure profile in relation to the last quarter of the relevant Financial Year.

9.4 The parties may agree to extend any Milestone Date in accordance with the process set out in Condition 9.2 provided that the GLA shall not under any circumstances be required or obliged to extend a Named Project Completion Date beyond the date set out in OPS by which Completion must be achieved, (but may at its sole discretion elect to do so).

10 **Grant Claim Procedures**

10.1 Subject to:

10.1.1 a Named Project having reached the Acquisition Date;

10.1.2 where such Named Project is an Estate Regeneration Project, the Estate Regeneration Funding Condition having been satisfied; and

10.1.3 the Grant Recipient being in possession of a Completed Interest (save where the GLA has provided the Drawdown Confirmation, having regard to paragraphs 2.4 and 2.5 of the Agreed Principles),

the Grant Recipient may apply to the GLA for the Acquisition Tranche Grant payable in respect of that Named Project to be paid to it. The Grant Recipient must make its application through OPS in accordance with the requirements of OPS from time to time and in compliance with the applicable procedures relating to grant claims and payments set out in the Affordable Housing Capital Funding Guide.

10.2 In submitting an application pursuant to Condition 10.1 the Grant Recipient repeats the representations and warranties set out in Condition 7.2 (save in respect of Condition 7.2.2(a) and 7.2.2(b)) and further represents and warrants to the GLA that:

10.2.1 the Site has been acquired and the Works have been or will be procured, designed and carried out (as applicable) in accordance with the SHAP Minimum Standards and requirements of this Agreement;

10.2.2 the Acquisition Date has been reached and that such date is no later than that submitted in OPS by the Grant Recipient and accepted by GLA (in its absolute discretion);

10.2.3 all confirmations and certifications made or to be made by the Grant Recipient, in OPS (or as otherwise required by this Agreement) in relation to the Named Project have been are or will be correct in all material respects, including the projected Total Scheme Costs;

10.2.4 it has obtained all Consents necessary for the lawful design, construction refurbishment or remodelling of the Named Project in accordance with the Named Project Details and to the SHAP Minimum Standards as are then required or to the extent that they are not obtained that the Grant Recipient has taken all necessary steps to obtain them, is waiting only for the Relevant Authority to issue them and is not aware (having made all reasonable enquiries) of any reason why such Consents will not be given or issued;

10.2.5 the Named Project comprises (or will comprise) no dwellings which have not been designed for use by those in the relevant Target Client Group (Initial) or do not meet the SHAP Minimum Standards;

10.2.6 the Grant Recipient:

(a) is a Registered Provider; and

(b) retains its status as an Investment Partner and such status extends to the Named Project in respect of which the application under Condition 10.1 has been made;

10.2.7 no Withholding Event or Default Event has occurred or arisen;

10.2.8 the Named Project is or will be compliant with the SHAP Minimum Standards;

10.2.9 it has complied with (or will comply with) Condition 4 within any timescales required in such provisions;

10.2.10 either:

(a) the Named Project is not an Estate Regeneration Project; or

(b) the Estate Regeneration Requirement has been or will be complied with and to the best of the Grant Recipient's knowledge (having made all reasonable and proper enquiries):

i no material facts or circumstances exist which prejudice such compliance or mean that the Compliance Checklist or the Exemption Certificate (as applicable) is no longer correct in all material respects; and

ii the Exemption Certificate remains extant and has not been withdrawn by the GLA; and

10.2.11 save where the GLA has provided the Drawdown Confirmation:

(a) the Grant Recipient possesses a Completed Interest; and

(b) other than where it possesses a Non Registrable Lease, the Grant Recipient is registered or has applied for registration as the proprietor of the Site at the Land Registry.

10.2.12 where applicable, the Grant Recipient has satisfied any Drawdown Conditions within any timescales required by the GLA (in its absolute discretion);

10.2.13 the Grant Recipient or (where relevant) their superior landlord does not appear on the London Rogue Landlord and Agent Checker database maintained by the GLA;

10.2.14 where a Named Project comprises any Exempt Accommodation, the Grant Recipient has provided (or will provide) the GLA with the Exemption Evidence before the Eligible Tenant occupies the relevant SHAP Dwelling;

10.2.15 it is not subject to any Section 15 Direction nor do any circumstances exist which would permit such a direction to be issued;

10.2.16 no Section 114 Report has been made nor is the Grant Recipient aware of any circumstances that would give rise to the making of any such report; and

10.2.17 in the terms of any additional representations and warranties that the GLA may require in respect of any additional tranche provided pursuant to Condition 7.7.

10.3 Subject to a Named Project having reached the Start on Site Date, and where such Named Project is an Estate Regeneration Project, the Estate Regeneration Funding Condition having been satisfied the Grant Recipient may apply to the GLA for the Start on Site Tranche Grant payable in respect of that Named Project to be paid to it. The Grant Recipient must make its application through OPS and in accordance with the requirements of OPS from time to time and in compliance with the applicable procedures set out in the Affordable Housing Capital Funding Guide.

10.4 In submitting an application pursuant to Condition 10.3 or in the case where Start on Site has been achieved but no sum is payable by way of Start on Site Tranche Grant as determined through OPS, the Grant Recipient repeats the representations and warranties at Condition 10.2.1, 10.2.3 to 10.2.6(a) (inclusive), 10.2.7 to 10.2.10 (inclusive), 10.2.12 to 10.2.17 (inclusive) and further represents and warrants to the GLA that:

10.4.1 Start on Site has (where applicable) been reached by such date that is no later than that submitted in OPS by the Grant Recipient and accepted by GLA (in its absolute discretion);

10.4.2 the Grant Recipient retains its status as an Investment Partner and such status extends to the Named Project in respect of which the application under Condition 10.3 has been made;

10.4.3 the Grant Recipient possesses a Completed Interest; and

10.4.4 other than where it possesses a Non Registrable Lease, the Grant Recipient is registered or has applied for registration as the proprietor of the Site at the Land Registry.

10.5 Subject to a Named Project having reached the Named Project Completion Date and compliance by the Grant Recipient with Condition 10.7, the Grant Recipient may apply to the GLA for the Completion Tranche Grant payable in respect of that Named Project to be paid to it. The Grant Recipient must make its application through OPS and in accordance with the requirements of OPS from time to time and in compliance with the applicable procedures set out in the Affordable Housing Capital Funding Guide.

10.6 In submitting an application pursuant to Condition 10.5 the Grant Recipient repeats the representations and warranties at Condition 10.2.1, 10.2.3 to 10.2.6(a) (inclusive), 10.2.7 to 10.2.10 (inclusive), 10.2.12 to 10.2.17 (inclusive) and further represents and warrants to the GLA that:

10.6.1 the Named Project has reached Completion (unless otherwise expressly agreed by the GLA on OPS) and meets the SHAP Minimum Standards;

10.6.2 the Grant Recipient retains its status as an Investment Partner and such status extends to the Named Project in respect of which the application under Condition 10.310.5 has been made;

10.6.3 the Grant Recipient possesses a Completed Interest;

10.6.4 other than where it possesses a Non Registrable Lease, the Grant Recipient is registered or has applied for registration as the proprietor of the Site at the Land Registry; and

10.6.5 the Updated Total Scheme Costs are accurately and fairly presented.

10.7 The Grant Recipient must provide the Updated Total Scheme Costs (if different to the Total Scheme Costs) on OPS within ten (10) Business Days prior to making any application in respect of a Named Project pursuant to Condition 10.5 or Condition 10.8.

10.8 Where Completion has been achieved but no sum is payable by way of Completion Tranche Grant (as determined through OPS) the Grant Recipient:

10.8.1 must make an application on OPS in accordance with Condition 10.5 within ten (10) Business Days of Completion of the relevant Named Project as if it were applying for Completion Tranche Grant; and

10.8.2 will be deemed to make the representations and warranties set out in Condition 10.6 with respect to the relevant Named Project at the time of submitting such application in OPS.

10.9 Where any Named Project is identified on OPS as being an MMC Project, the parties may agree alternative dates for the payment of Named Project Grant and/or Milestones (which better reflect the nature and characteristics of Modern Methods of Construction) in OPS or in such other medium as GLA may specify and where this Condition 10.9 applies the GLA reserves the right to:

10.9.1 require that the Grant Recipient makes additional representations and warranties as a condition of any claim for Named Project Grant;

10.9.2 include any additional delivery obligations having regard to the use of the Modern Methods of Construction; and

10.9.3 require the Grant Recipient to document and effect such additional representations and warranties and/or delivery obligations by such method as the GLA may determine.

11 **Payment of Grant**

11.1 Subject to:

11.1.1 the GLA (acting reasonably) being satisfied with the Grant Recipient's application for payment including the information warranted under this Agreement;

11.1.2 the GLA being satisfied that any applicable Drawdown Conditions have been fulfilled within any timescales required by the GLA (in its absolute discretion);

11.1.3 Conditions 9, 11.3 and 13; and

11.1.4 the Condition Precedent having been satisfied,

the GLA shall (resources permitting) pay the Applicable Tranche to the Grant Recipient within ten (10) Business Days of receipt of the satisfactory application.

11.2 If the GLA is not satisfied with the Grant Recipient's application for payment and/or the matters identified in Condition 11.1, it must notify the Grant Recipient in writing as soon as reasonably practicable and in any event within ten (10) Business Days of receipt of the application for payment identifying the reason for its dissatisfaction. The GLA must allow the Grant Recipient a period of up to ten (10) Business Days to address the issues identified in the notification and to resubmit or amend its application accordingly in which case the provisions of Condition 10 and this Condition 11 (as applicable) will be reapplied to the Grant Recipient's resubmitted or amended application for payment.

11.3 Where Condition 7.8.3 applies GLA shall be entitled to do any of the following:

11.3.1 reduce the Completion Tranche Grant claimed pursuant to Condition 10.6 by an amount equal to the Differential Grant Amount and if the reduction would result in the Completion Tranche Grant figure being a negative figure (and representing therefore an overpayment of grant), GLA shall also be entitled to reclaim a sum equivalent to the negative figure expressed as a positive sum; or

11.3.2 reclaim the Differential Grant Amount from the Grant Recipient

and where GLA exercises its rights to reclaim grant under this Condition 11.3 the Grant Recipient shall pay the amount due within 15 (fifteen) Business Days of receipt of GLA's demand for the same.

11.4 The GLA shall not be obliged to pay the Grant Recipient any Tranche before the date identified in the Named Project Details as the applicable forecast Milestone Date.

11.5 The GLA shall not be obliged to pay any Tranche if the Named Project has not:

11.5.1 been accepted by the GLA through OPS; and

11.5.2 achieved (as applicable):

(a) Acquisition;

(b) Start on Site;

(c) Completion; or

(d) where expressly agreed by the GLA, such other Milestone;

by the relevant Milestone Date identified in the Named Project Details which GLA has expressly agreed (subject to any extension to such date pursuant to Condition 9).

11.6 Where the GLA pays Named Project Grant to the Grant Recipient, the Allocated Grant shall be reduced by a commensurate amount.

11.7 The GLA shall not be obliged to make any payment by way of Named Project Grant or otherwise in respect of any Named Project which in its opinion is unlikely to achieve Completion by the relevant Named Project Completion Date (but may at its sole discretion elect to do so).

11.8 The payment of Named Project Grant or any part thereof hereunder by the GLA to the Grant Recipient shall be regarded as exclusive of any VAT chargeable thereon.

12 **Disposals**

12.1 The Grant Recipient must provide a Disposal Notification to the GLA of any Disposal prior to such Disposal taking place.

12.2 Notwithstanding any other provision of this Agreement the Grant Recipient shall unless otherwise agreed by the GLA remain liable and responsible for the performance of its obligations under this Agreement notwithstanding the grant by it of any Short Lease in relation to any SHAP Dwelling.

12.3 The Grant Recipient will:

12.3.1 use all reasonable endeavours to ensure that that any person providing the Disposal Notification, Compliance Checklist, or any other notifications or certificates from the Grant Recipient to the GLA (the **Grant Recipient**

Notifications) is a senior officer of the Grant Recipient with access to the information and knowledge needed accurately to give the information required; and

12.3.2 notify the GLA if:

(a) it becomes aware that the Grant Recipient Notifications are erroneous in any material respect;

(b) the facts or circumstances upon which a Compliance Checklist or Exemption Certificate was provided (as applicable) have changed so that such document is no longer correct in all material respects; or

(c) an Exemption Certificate expires.

13 **Withholding of Named Project Grant**

13.1 Notwithstanding any other term of this Agreement the GLA shall not be obliged to make any payment to the Grant Recipient whether by way of any Tranche where:

13.1.1 the Named Project has not been Delivered in accordance with the Named Project Details or to the SHAP Minimum Standards or in accordance with the Named Project Delivery Timetable (in circumstances where the GLA was unable to agree revised Milestone Dates);

13.1.2 the Grant Recipient is unable to give the confirmations or certifications required by OPS or to make the representations and give the warranties referred to in this Agreement (in any case in whole or in part);

13.1.3 a Prohibited Act has been committed by or on behalf of the Grant Recipient and the Grant Recipient has not satisfied the Waiver Condition in respect of such Prohibited Act;

13.1.4 the Grant Recipient is subject to a Section 15 Direction or a Section 114 Report which has or will have a Material Adverse Effect;

13.1.5 the Grant Recipient has ceased to operate or trade;

13.1.6 the Grant Recipient's status as a:

(a) Registered Provider is removed or withdrawn; or

(b) an Investment Partner is withdrawn, removed or restricted such that it does not extend to a Named Project or GLA becomes aware that such status is likely to be withdrawn, removed or restricted;

13.1.7 the Regulator directs the GLA not to give grant to the Grant Recipient or formally recommends to it that it should not do so;

13.1.8 the Grant Recipient (either by its own actions or omissions, or those of its contractors or agents) harms reputation of the SHAP, DLUHC or the GLA or brings the GLA, DLUHC or the SHAP into disrepute;

13.1.9 the Grant Recipient has failed to comply with its obligations under any of Conditions 2 to 5 (inclusive), 8, 12, 14 or 17;

13.1.10 any consent necessary to deliver a Named Project or the Approved Bid (as applicable) is revoked or withdrawn;

13.1.11 where applicable, the Grant Recipient has failed to satisfy any Drawdown Condition within any timescales required by the GLA (in its absolute discretion); and

13.1.12 the Grant Recipient has failed to submit or, in the opinion of the GLA, failed to implement a Remediation Plan within the requisite timeframes pursuant to Condition 26.4.

13.2 Without prejudice to any other term of this Agreement, where the GLA determines (acting reasonably) that proper progress against the Grant Recipient's projections in the Approved Bid has not been made by the Grant Recipient in Delivery of the SHAP Dwellings in accordance with the Approved Bid, the GLA shall be entitled (acting reasonably) and without any liability to the Grant Recipient permanently to withhold any Named Project Grant and to reallocate it to a third party. Nothing in this Condition 13.2 shall preclude the GLA from withholding the relevant Named Project Grant on any other ground.

14 **Repayment of Grant**

14.1 The parties acknowledge and agree that:

14.1.1 the Recovery Determination has effect (mutatis mutandis) in respect of all grant funding paid to the Grant Recipient under this Agreement;

14.1.2 for the purposes of the Recovery Determination the terms of this Agreement represent the conditions attached to the making of Capital Grant; and

14.1.3 on the occurrence of a Relevant Event the Grant Recipient must recycle or repay (as applicable) the Capital Grant Recoverable in each case in accordance with the terms of the Recovery Determination and the Affordable Housing Capital Funding Guide (having regard to any requirements specified to apply to grant provided under SHAP in Section 6.6 of the Affordable Housing Capital Funding Guide).

14.2 Without prejudice to any other term of this Agreement, the GLA reserves the right whether following termination of this Agreement or otherwise (which right the Grant Recipient expressly acknowledges and agrees) to recover from the Grant Recipient such sum or such part or aggregation thereof as is determined in accordance with Condition 14.3 (the **Recoverable Amount**) in circumstances where:

14.2.1 a Prohibited Act has occurred and the Grant Recipient has not satisfied the Waiver Condition in respect of such Prohibited Act;

14.2.2 the relevant Tranche has been paid to the Grant Recipient on the basis of a misrepresentation made by or on behalf of the Grant Recipient other than in the circumstances specified in Condition 14.2.4;

14.2.3 the GLA has made an overpayment in relation to a Named Project or has made a payment in error to the Grant Recipient;

14.2.4 the Named Project Grant has been paid to the Grant Recipient but the GLA becomes aware (whether following the completion of a Compliance Audit or otherwise) that the Grant Recipient has failed to deliver the relevant Named Project in accordance with the agreed Named Project Details;

14.2.5 the Grant Recipient has breached its obligations under Condition 8;

14.2.6 the Grant Recipient is subject to a Section 15 Direction or a Section 114 Report which has or will have a Material Adverse Effect;

14.2.7 a Partial Termination Event has occurred;

14.2.8 a Total Termination Event has occurred;

14.2.9 an Estate Regeneration Default has occurred;

14.2.10 a Minimum Period of Use Termination Event has occurred;

14.3 In the circumstances set out in:

14.3.1 any of Conditions 14.2.1, 14.2.6 or 14.2.8 the Recoverable Amount shall be a sum equivalent to the aggregate of all Named Project Grant paid to the Grant Recipient under or in connection with this Agreement;

14.3.2 any of Conditions 14.2.2, 14.2.5, 14.2.7 or 14.2.9 the Recoverable Amount shall be a sum equivalent to the Named Project Grant for any affected Named Project;

14.3.3 Condition 14.2.3, the Recoverable Amount shall be a sum equal to the amount of the overpayment or the sum paid in error;

14.3.4 Condition 14.2.4, subject always to Condition 14.4, the Recoverable Amount shall be determined in accordance with the following procedure:

(a) the parties (acting in good faith) shall seek to agree within 15 (fifteen) Business Days of the Non Compliance Notification Date a revised figure for the Named Project Grant figure reflecting the changed nature of the delivered Named Project as against that described in the Named Project Details;

(b) where a revised figure for Named Project Grant is agreed, the Recoverable Amount shall be the product of the following calculation:

RA = NPG – RTPG

where

RA is the Recoverable Amount;

NPG is the Named Project Grant paid pursuant to Condition 11.1 in respect of the relevant Named Project; and

RNPG is the revised Named Project Grant figure agreed pursuant to Condition 14.3.4(a);

(c) the Grant Recipient shall immediately amend the relevant information on OPS in respect of the relevant Named Project to reflect the agreement made pursuant to Condition 14.3.4(a);

(d) where the parties are unable to agree a revised Named Project Grant figure in accordance with Condition 14.3.4(a) the GLA shall be entitled to exercise its termination rights under Condition 5.4.3 and the Recoverable Amount shall be an amount equal to the Named Project Grant paid pursuant to Condition 11.1 in respect of the relevant Named Project;

(e) under no circumstances will the GLA be required to make any payment to the Grant Recipient if the application of the calculation in Condition 14.3.4(b) results in RA being a negative figure;

14.3.5 Condition 14.2.10, the Recoverable Amount shall be an amount equal to the product of the following calculation:

RA = NPG – Utilised Grant

where:

RA is the Recoverable Amount;

NPG is such amount of Named Project Grant paid to the Grant Recipient in respect of the relevant SHAP Dwelling (as set out in OPS);

Utilised Grant = (NPG/A) x B

where:

A is the Minimum Period of Use expressed as a number of months for the Lapsed SHAP Dwelling; and

B is the number of months which GLA determines that the Lapsed SHAP Dwelling was used without a Minimum Period of Use Breach arising.

14.4 Where the GLA (acting reasonably) considers that the Grant Recipient acted fraudulently or dishonestly in claiming the Named Project Grant for the relevant Named Project, the GLA shall be entitled to treat such claim as a Prohibited Act for the purposes of Condition 5.1 and will not be bound by the terms of Condition 14.3.4.

14.5 The Grant Recipient acknowledges and agrees that the failure to use a SHAP Dwelling for the Agreed Purposes (save where the GLA has provided consent in accordance with Condition 4.6.1, Condition 8.6.1, or Condition 16.3) constitutes a failure to comply with a condition attached to the making of Capital Grant for the purposes of paragraph 8(e) of the Recovery Determination.

14.6 The Grant Recipient shall pay interest at two per centum (2%) above the base rate from time to time of the Royal Bank of Scotland plc on all sums which fall to be repaid pursuant to this Condition 14, such interest to run from the date upon which the Named Project Grant

(or relevant part thereof), overpayment or payment in error (as applicable) was paid to the Grant Recipient until the date upon which the GLA receives the repayment required from the Grant Recipient under this Condition 14.

14.7 The parties acknowledge that the Late Payment of Commercial Debts (Interest) Act 1998 does not apply to this Agreement.

14.8 Notwithstanding any other term of this Condition 14, where a payment has been made following an administrative error by the GLA, the Grant Recipient shall not be liable for interest on the amount repayable under Condition 14.6.

14.9 The parties acknowledge that where the provisions of Condition 14.2.10 apply the GLA shall be entitled (in its absolute discretion) to either:

14.9.1 recover from the Grant Recipient the Minimum Use Breach Amount; or

14.9.2 require the Grant Recipient to recycle the Minimum Use Breach Amount into such purposes as may be agreed by the GLA in accordance with any requirements in Section 6 of the Affordable Housing Capital Funding Guide which apply to grant provided under SHAP.

15 **VAT**

15.1 Except where expressly stated to the contrary in this Agreement:

15.1.1 the amount of any payment or the value of any supply is expressed exclusive of VAT properly chargeable on it;

15.1.2 where any payment or taxable supply falls to be made pursuant to this Agreement VAT properly chargeable on it will be paid in addition by the recipient of the supply for which payment (if any) is consideration on the provision of a valid VAT invoice for it.

15.2 The Grant Recipient considers that the payment of grant funding under or in connection with this Agreement is outside the scope of VAT. In the event that the GLA is the recipient of a supply or supplies of specified services (as such term is defined in the Value Added Tax (Section 55A) (Specified Services and Excepted Supplies) Order 2019 (the **Order**)) under or in connection with this Agreement, the GLA confirms that the requirements specified in article (8)(1)(b) of the Order are satisfied in respect of the supply or supplies with the result that section 55A(6) of the Value Added Tax Act 1994 will not apply to such supply or supplies. The Grant Recipient acknowledges that it will account for and pay any VAT on any taxable supply or supplies it makes to the GLA under or in connection with this Agreement.

16 **Substitute Dwellings**

16.1 Until the expiry of the Minimum Period of Use of a SHAP Dwelling, where there is a reasonable prospect that the Grant Recipient will (acting reasonably) be unable to use a SHAP Dwelling (the **Original Dwelling**) for the Agreed SHAP Purposes (other than in the circumstances contemplated in Condition 4.4) the Grant Recipient must submit on OPS the Substitute Dwelling Details as soon as reasonably practicable and in any event no later than ten (10) Business Days prior to date of the proposed substitution.

16.2 In submitting the Substitute Dwelling Details pursuant to Condition 16.1, the Grant Recipient:

16.2.1 makes the same representations and warranties in relation to the Proposed Substitute Dwelling as it makes to the GLA in relation to a Named Project pursuant to Condition 7.2 (mutatis mutandis);

16.2.2 represents and warrants to the GLA that if the Proposed Substitute Dwelling is accepted by the GLA:

(a) the Grant Recipient has (or within two (2) weeks of the Substitute Dwelling Acceptance Date will have) a Completed Interest in the proposed Substitute Dwelling;

(b) the Substitute Dwelling will be available for occupation within two (2) weeks of the Substitute Dwelling Acceptance Date (or such later date as the GLA as expressly agreed);

(c) the Minimum Period of Use provided by the Substitute Dwelling will be no less than the unexpired term of the Minimum Period of Use of the Original Dwelling;

(d) the Substitute Dwelling is at least the same size (by square meter and by bedroom number) as the Original Dwelling (unless the GLA has otherwise expressly agreed);

(e) the proposed Substitute Dwelling meets the SHAP Minimum Standards (unless the GLA has otherwise expressly agreed);

(f) the Nominations Agreement, Nomination Details, Tenancy Type and Tenancy Term set out on OPS with respect to the Original Dwelling will, (unless the GLA has otherwise expressly agreed) continue to apply to the Substitute Dwelling for the unexpired term of the Minimum Period of Use of the Original Dwelling; and

(g) the Substitute Dwelling Details provided to the GLA are true, complete and accurate in all respects;

16.2.3 acknowledges and agrees that if the Substitute Dwelling is accepted by the GLA under Condition 16.3:

(a) the amount of Named Project Grant paid to it in respect of the Original Dwelling (as set out in OPS) shall be deemed to have been paid to it in respect of the Substitute Dwelling; and

(b) any grant repayment obligations assumed by the Grant Recipient under this Agreement in respect of the Original Dwelling are assumed by it in respect of the Substitute Dwelling.

16.3 The GLA shall consider the Substitute Dwelling Details and:

16.3.1 if the GLA (in its absolute discretion) is satisfied (a) with the information provided, (b) that the Tenancy Support Services for the incoming Tenant are satisfactory (c) with the description and suitability of the proposed Substitute Dwelling (d) with

the Grant Recipient's performance in relation to the Approved Bid to date, (e) that no Default Event subsists and (f) with such other matters as the GLA may from time to time determine, the GLA shall be entitled (but not obliged) to accept the Proposed Substitute Dwelling into the Approved Bid as a Substitute Dwelling comprised within the Original Named Project; and

16.3.2 provided that:

(a) all relevant Substitute Dwelling Details have been correctly uploaded to OPS;

(b) the address for the Original Dwelling within the Original Named Project Details has been accurately updated by the Grant Recipient with the address for the Substitute Dwelling; and

(c) OPS accurately reflects the quantum of Named Project Grant allocated to the Substitute Dwelling,

the GLA shall confirm its acceptance of the Substitute Dwelling into the Approved Bid to the Grant Recipient through OPS.

16.4 With effect from the Substitute Dwelling Acceptance Date:

16.4.1 the Substitute Dwelling shall be deemed to be comprised within the Original Named Project for the purposes of this Agreement;

16.4.2 the Substitute Dwelling shall be deemed to be a SHAP Dwelling for the purposes of this Agreement and immediately subject to its whole terms and conditions;

16.4.3 the Approved Bid shall be deemed to be varied to include the Substitute Dwelling;

16.4.4 the details set out by the Grant Recipient in respect of the Substitute Dwelling in OPS and as confirmed by the GLA through OPS shall be deemed to be comprised within the Original Named Project Details for the purposes of this Agreement;

16.4.5 the amount of Named Project Grant paid to the Grant Recipient in respect of the Original Dwelling (as set out in OPS) shall be deemed to have been paid to it in respect of the Substitute Dwelling and any grant repayment obligations assumed by the Grant Recipient under this Agreement in respect of the Original Dwelling are assumed by it in respect of the Substitute Dwelling; and

16.4.6 the Grant Recipient must ensure that it complies with all of its obligations under this Agreement as they apply to such Substitute Dwelling and Original Named Project (as applicable).

16.5 Where:

16.5.1 the Grant Recipient fails to comply with Condition 16.1; or

16.5.2 the GLA does not accept a Substitute Dwelling pursuant to Condition 16.3,

a Minimum Period of Use Breach shall be deemed to have occurred and the terms of Condition 5.1.21(a) shall apply.

17 **Open Book Obligations**

17.1 The Grant Recipient shall on an Open Book Basis:

17.1.1 at all times maintain a full record of particulars of all the income (including Public Sector Funding) received and Project Costs incurred by the Grant Recipient in respect each Named Project;

17.1.2 at all times when reasonably required to do so by the GLA, provide a summary of any of the income and Project Costs referred to in Condition 17.1.1 as the GLA may reasonably require to enable it to monitor the performance by the Grant Recipient of its obligations under this Agreement; and

17.1.3 at all times provide such access or facilities as the GLA may reasonably require for its representatives to visit any place where the records are held and examine the records maintained under this Condition 17.

17.2 Compliance with the above shall require the Grant Recipient to keep (and where appropriate to procure that any Subcontractor shall keep) separate books of account (from those relating to any business, activity or operation carried on by the Grant Recipient or Subcontractor and which do not directly relate to the relevant Named Project) in accordance with good accountancy practice with respect to each Named Project showing in detail:

17.2.1 income (including Public Sector Funding and receipts);

17.2.2 administrative overheads where directly attributed or where apportioned on a pro rata basis;

17.2.3 payments made to Subcontractors;

17.2.4 capital and revenue expenditure;

17.2.5 VAT incurred on all items of expenditure where the Grant Recipient has received grant under this Agreement in respect of such VAT, including the rate of such VAT and full details of the recovery (or not) by the Grant Recipient of such VAT as input tax from HM Revenue & Customs or other Competent Authority; and

17.2.6 such other item as the GLA may reasonably require to conduct (itself or through a third party) cost audits for verification of income, cost expenditure or estimated expenditure, for the purpose of any of the provisions of this Agreement,

and the Grant Recipient shall have (and procure that to the extent expressly agreed the Subcontractors shall have) the books of account evidencing the items listed in this Condition available for inspection by the GLA (and any person appointed pursuant to the dispute resolution provisions at Condition 28 to determine a dispute or otherwise authorised by the GLA) upon reasonable notice, and shall submit a report of these to the GLA as and when requested.

18 **Special Conditions**

The parties acknowledge and agree that the Special Conditions apply and have effect.

19 **Additional Projects**

19.1 The parties shall be entitled to agree to add Additional Projects to those comprised within the Original Approved Bid until the expiry of the CME Period.

19.2 Where Condition 19.1 applies, the Grant Recipient shall submit to the GLA through OPS such details of the proposed Additional Project as the GLA may require. In submitting details of any Additional Named Projects, the Grant Recipient makes the same representations and warranties in relation to the proposed Additional Named Project as it makes to the GLA pursuant to Condition 7.2.

19.3 The GLA shall consider the proposed Additional Project and if the GLA (in its absolute discretion) is satisfied (a) with the information provided, (b) that the Tenancy Support Services for the incoming Tenant are satisfactory, (c) with the description and suitability of the proposed Additional Project (d) with the Grant Recipient's performance in relation to the Approved Bid to date, (e) that no Default Event subsists, (f) that the Additional Project falls within the ambit of the Grant Recipient's Investment Partner status, (g) with such other matters as the GLA may from time to time determine (including whether Condition 7.3.4 is likely to be satisfied in respect of the Additional Project) and (h) that the GLA has sufficient financial resources available to it (taking account inter alia of its commitments under the SHAP or other programme commitments), the GLA shall be entitled (but not obliged) to accept the proposed:

19.3.1 Additional Indicative Project into the Approved Bid as a new Indicative Project; or

19.3.2 Additional Named Project into the Approved Bid as a new Named Project

and shall confirm its acceptance of such new Indicative Project or Named Project (as applicable) to the Grant Recipient through OPS.

19.4 With effect from the Additional Project Acceptance Date:

19.4.1 any:

(a) Additional Indicative Project shall be deemed to be an Indicative Project and immediately subject to Conditions 6.2 to 6.6 (inclusive) and any other terms and conditions of this Agreement which apply to Indicative Projects;

(b) Additional Named Project shall be deemed to be a Named Project for the purposes of this Agreement and immediately subject to its whole terms and conditions; and

(c) the details set out by the Grant Recipient in OPS in respect of any Additional Named Project, as confirmed by the GLA through OPS shall be deemed to be Named Project Details for the purposes of this Agreement;

19.4.2 the Grant Recipient must ensure that it complies with all of its obligations under this Agreement as they apply to such new Indicative Project or Named Project (as applicable).

19.5 If the GLA agrees to make available any grant funding in relation to an Additional Named Project, the Allocated Grant will be deemed to be adjusted by the amount of grant agreed by the GLA in OPS as the maximum amount payable in respect of the new Indicative Project or Named Project (as applicable)**.**

20 **Subsidy**

20.1 The parties acknowledge that they have structured this Agreement with the objective that it is lawful and does not give rise to Subsidy.

20.2 Notwithstanding anything in this Agreement the GLA shall only provide Named Project Grant to the extent that such does not give rise to Unlawful Subsidy.

20.3 Notwithstanding Conditions 20.1 and 20.2 of this Agreement if any Named Project Grant is found to constitute Unlawful Subsidy (or is under investigation or subject to judicial proceedings in relation to compliance with the requirements of the Subsidy Control Requirements) then:

20.3.1 the parties acting in good faith will promptly seek to restructure the arrangements surrounding the Named Project Grant and the terms of this Agreement to the extent necessary to ensure that no Unlawful Subsidy subsequently arises from it; and/or

20.3.2 the parties shall promptly cooperate in good faith to provide evidence that the Named Project Grant (or the restructured Named Project Grant) does not or will not give rise to Unlawful Subsidy.

20.4 If any Named Project Grant is found to constitute Unlawful Subsidy and/or is not capable of being restructured so as to be compliant pursuant to Condition 20.3 then the Grant Recipient must repay any sum of Unlawful Subsidy plus such interest as is prescribed by the Subsidy Control Requirements within 15 (fifteen) Business Days of the GLA issuing it with a written demand for payment.

20.5 If, following the date of this Agreement, the law requires the GLA to amend this Agreement to comply with the Subsidy Control Requirements then the GLA may, acting reasonably, provide written notice to the Grant Recipient to vary this Agreement to the extent necessary to comply with such change in law.

20.6 The Grant Recipient shall promptly give written notice to the GLA if it becomes aware of an allegation or a finding that Unlawful Subsidy has arisen in relation to this Agreement (including the delivery of the Grant Recipient's obligations under it) and/or the Named Project Grant, whether the same allegation or finding relates to the Grant Recipient or otherwise.

21 **Representations and Warranties**

Without prejudice to any other term of this Agreement, the Grant Recipient:

21.1.1 represents and warrants in the terms set out in Schedule 3 to the GLA on the date hereof and on each day during the currency of this Agreement; and

21.1.2 acknowledges and agrees that the GLA is relying on such representations and warranties and that each of such warranties and representations shall be separate and independent and, save as expressly provided to the contrary, shall not be limited by reference to any of them or by any other provisions of this Agreement.

22 **Information and confidentiality**

22.1 The parties to this Agreement are FOIA Authorities and:

22.1.1 are subject to legal duties which may require the release of Information under FOIA and/or EIR; and

22.1.2 FOIA Authorities may be under an obligation to provide Information subject to a Request for Information.

22.2 The FOIA Authority in receipt of or to receive the RFI (the **Relevant FOIA Authority**) shall be responsible for determining in its absolute discretion whether:

22.2.1 any Information is Exempted Information or remains Exempted Information; and/or

22.2.2 any Information is to be disclosed in response to a Request for Information;

and in no event shall any party, other than the Relevant FOIA Authority, respond directly to an RFI except to confirm receipt of the RFI and that the RFI has been passed to the Relevant FOIA Authority unless otherwise expressly authorised to do so by the Relevant FOIA Authority.

22.3 Subject to Condition 22.4 below, each party acknowledges that the Relevant FOIA Authority may be obliged under FOIA or EIR to disclose Information:

22.3.1 without consulting the other; or

22.3.2 following consultation with the other party and having taken (or not taken, as the case may be) its views into account.

22.4 Without in any way limiting Conditions 22.2 or 22.3, in the event that the Relevant FOIA Authority receives an RFI, the Relevant FOIA Authority will, where appropriate, as soon as reasonably practicable notify the other party.

22.5 Each party will assist and co-operate with the Relevant FOIA Authority as requested by the Relevant FOIA Authority to enable the Relevant FOIA Authority to comply with its disclosure requirements under FOIA and EIR within the prescribed periods for compliance and in particular without limitation will (and shall procure that its agents contractors and sub-contractors will), at their own cost:

22.5.1 transfer any RFI received by the Relevant FOIA Authority to the GLA as soon as practicable after receipt and in any event within two (2) Business Days of receiving an RFI;

22.5.2 provide all such assistance as may be required from time to time by the Relevant FOIA Authority and supply such data or information as may be requested by the GLA;

22.5.3 provide the Relevant FOIA Authority with any data or information in its possession or power in the form that the Relevant FOIA Authority requires within five (5) Business Days (or such other period as the Relevant FOIA Authority may specify) of the GLA requesting that Information;

22.5.4 permit the Relevant FOIA Authority to inspect such as requested from time to time.

22.6 Nothing in this Agreement will prevent the Relevant FOIA Authority from complying with any valid order, decision, enforcement or practice recommendation notice issued to it by the Information Commissioner under FOIA and/or EIR in relation to any Exempted Information.

22.7 The obligations under Condition 22.9 shall not apply to:

22.7.1 information which at the time of disclosure is in the public domain;

22.7.2 information which is required to be disclosed by law; or

22.7.3 information which is disclosed with the consent of the disclosing party.

22.8 The Grant Recipient acknowledges and agrees that the GLA:

22.8.1 is subject to the Transparency Commitment and accordingly, notwithstanding Condition 22.9, the Grant Recipient hereby gives its consent for the GLA to publish the Agreement Information to the general public; and

22.8.2 the GLA may in its absolute discretion redact all or part of the Agreement Information prior to its publication. In so doing and in its absolute discretion the GLA may take account of the exemptions/exceptions that would be available in relation to information requested under FOIA. The GLA may in its absolute discretion consult with the Grant Recipient regarding any redactions to the Agreement Information to be published pursuant to this Condition 22.8. The GLA shall make the final decision regarding publication and/or redaction of the Agreement Information.

22.9 Subject to Conditions 22.1 to 22.6, 22.7 and/or 22.8 the parties shall keep confidential any information exchanged between the parties which either party has specified as confidential or which would be likely to prejudice the interests of either party commercially or otherwise.

23 **Intellectual Property**

23.1 Subject to Condition 23.5 the Grant Recipient shall, to the extent that it is able to do so without incurring material cost, grant to the GLA a perpetual, transferable, non-exclusive, royalty-free licence (carrying the right to grant sub-licences) to copy and use (from computer disk or otherwise) all and any Intellectual Property Rights in any, drawings, reports, specifications, calculations and other documents provided by the Grant Recipient or which are or become owned by the Grant Recipient and which relate to the Named Projects, for any purpose relating to this Agreement.

23.2 To the extent that any of the data, materials and documents referred to in Condition 23.1 are generated by or maintained on a computer or in any other machine readable format, the Grant Recipient shall if requested by the GLA use its reasonable endeavours (without having to incur material cost) procure for the benefit of the GLA for the duration of this Agreement at the cost of the Grant Recipient the grant of a licence or sub-licence and supply any relevant software and/or database to enable the GLA making such request to access and otherwise use such data for the purposes referred to in Condition 23.1.

23.3 Neither party shall infringe any third party's Intellectual Property Rights in connection with this Agreement.

23.4 The Grant Recipient shall fully indemnify the GLA within five (5) Business Days of demand under this Condition 23.4 against any action, claim, demand, proceeding, cost, charge or expense arising from or incurred by it by reason of any infringement or alleged infringement of any Intellectual Property Rights of any third party by the activities described in this Condition 23, any breach by the Grant Recipient of this Condition 23 and against all costs and damages of any kind which the GLA may incur in connection with any actual or threatened proceedings before any court or adjudication body.

23.5 The Grant Recipient shall only be entitled to revoke the licence granted to the GLA under Condition 23.1 in the following circumstances and upon the following terms:

23.5.1 on the termination of the whole of this Agreement in circumstances where no Allocated Grant has been paid to or utilised by the Grant Recipient; or

23.5.2 on the termination of this Agreement (in whole or in part) in circumstances where some Allocated Grant has been paid to or utilised by the Grant Recipient **provided that** nothing in this Condition 23.5.2 shall entitle the Grant Recipient to revoke such licence insofar as it relates to Named Projects in respect of which Named Project Grant has been paid or in respect of which a valid entitlement to claim Named Project Grant has arisen.

24 **Grant Recipient's records and accounting**

24.1 The Grant Recipient shall, as and when requested by the GLA make available in a timely manner to the GLA where required in connection with this Agreement or the Approved Bid or any Named Project a copy of each of:

24.1.1 all data, materials, documents and accounts of any nature created, acquired or brought into existence in any manner whatsoever by or on behalf of the Grant Recipient for the purposes of this Agreement; and

24.1.2 all such data, materials, documents and accounts created, acquired or brought into existence by the Grant Recipient's officers, employees, agents or consultants relating to the Named Project and which have been supplied to the Grant Recipient for the purposes of this Agreement.

24.2 On the expiry of this Agreement or (if earlier) upon termination thereof, the Grant Recipient shall if requested to do so deliver up to the GLA all the data, materials, documents and accounts referred to in this Condition 24 which it has in its possession, custody or control and shall procure the handing over to the GLA such data, materials, documents and accounts referred to in Condition 24.1.2 or as otherwise directed by the GLA.

24.3 The Grant Recipient must for a period of ten (10) years from the date upon which it receives the Named Project Grant retain all of the data, documents, materials and accounts referred to in this Condition 24 and the Grant Recipient may retain such data, documents, materials and accounts in electronic form only.

24.4 The Grant Recipient acknowledges that the GLA's auditors (including The Comptroller and Auditor General) shall have unrestricted rights of access to the information referred to in Condition 24.1 pursuant to the National Audit Act 1983 and the Government Resources and Accounts Act 2000.

25 **Health and Safety**

25.1 The Grant Recipient will comply in all material respects with all relevant Legislation including but not limited to Legislation relating to health and safety, welfare at work, equality and diversity, modern slavery and other relevant employment matters and will use reasonable endeavours to procure that all Grant Recipient Parties engaged in the delivery of the Approved Bid do likewise.

25.2 To the extent that the GLA is a 'client' for the purposes of the CDM Regulations:

25.2.1 where the Grant Recipient is engaging consultants and a contractor or contractors as Subcontractors to deliver the Named Project the Grant Recipient elects to be the only client in relation to such Named Project; or

25.2.2 where the Grant Recipient is contracting with a developer as a Subcontractor to deliver a Named Project the Grant Recipient shall procure that such developer shall elect to be the only client in relation to the Named Project on or before the date that such project becomes a Named Project;

and the GLA hereby agrees to such election.

25.3 The Grant Recipient shall not seek to withdraw, terminate or in any manner derogate from such election pursuant to Condition 25.2.1 or (if appropriate) shall procure that any developer/employer shall not withdraw, terminate or in any manner derogate from any election pursuant to Condition 25.2.2 without the GLA's prior written consent, which the GLA may in its absolute discretion withhold.

25.4 The Grant Recipient shall at all times comply with all obligations, requirements and duties arising under the Building Safety Act 2022, HS Act, the regulations under the HS Act, RIDDOR and the CDM Regulations in connection with the Works.

25.5 The Grant Recipient will procure that all its Subcontractors and Professional Team comply at all times with the Building Safety Act 2022, the HS Act, the regulations under the HS Act, RIDDOR and the CDM Regulations.

26 **Equality, Diversity and Inclusion**

26.1 Within 12 (twelve) months from the notification of the Grant Recipient's funding allocation for SHAP on OPS (the **Deadline**), the Grant Recipient must:

26.1.1 comply (and thereafter continue to comply) with the five (5) minimum equality, diversity and inclusion standards found on the following website:

https://www.london.gov.uk/what-we-do/housing-and-land/homes-londoners-affordable-homes-programmes/homes-londoners-affordable-homes-programme-2021-2026/guidance-meeting-edi-funding-conditions; and

26.1.2 (save where the GLA has a Compliant EDI Action Plan in place) develop, publish and implement on a continuing basis, an equality, diversity and inclusion action plan which complies with the guidance found on the following website:https://www.london.gov.uk/what-we-do/housing-and-land/homes-londoners-affordable-homes-programmes/homes-londoners-affordable-homes-programme-2021-2026/guidance-meeting-edi-funding-conditions (**EDI Action Plan**).

26.2 The Grant Recipient shall provide evidence satisfactory to GLA (acting reasonably) of:

26.2.1 its compliance with Condition 26.1 within the five (5) Business Days following the Deadline; and

26.2.2 its continuing compliance with Condition 26.1, such evidence to be provided no later than 12 (twelve) months but no earlier than ten (10) months from the date the last evidence was provided pursuant to this Condition 26.2 or within such other timeframes as required by GLA (acting reasonably).

26.3 The Grant Recipient:

26.3.1 must comply in all material respects with all relevant Legislation including but not limited to Legislation relating to equality and diversity and will use its reasonable endeavours to procure that all parties engaged by it in the delivery of the SHAP Dwellings funded pursuant to this Agreement do likewise;

26.3.2 must have due regard to the public sector equality duty under Part 11 of the Equality Act 2010 and shall take reasonable steps to promote equality of opportunity in respect of access to the SHAP Dwellings funded pursuant to this Agreement and in particular shall:

(a) consider whether there is the need for specialist provision for the Programme Client Group accommodated in the SHAP Dwellings; and

(b) ensure that there is a process for undertaking needs assessments of Tenants and that the provision of the SHAP Dwellings is informed by the health and care needs of the relevant Tenant; and

26.3.3 must take reasonable steps to monitor the representation of those who share Protected Characteristics within its undertaking and shall take appropriate steps to remedy any under-representation in its workforce (of those sharing a Protected Characteristic as compared to the population of London) involved in projects within London funded (partly or wholly) by the GLA.

26.4 Where in the GLA's opinion (acting reasonably) the Grant Recipient commits a breach of this Condition 26 (an **EDI Breach**):

26.4.1 the Grant Recipient must submit for approval its proposed remediation plan (the **Remediation Plan**) to the GLA within 15 (fifteen) Business Days of the GLA's

written notice of the requirement for such Remediation Plan setting out the Grant Recipient's proposals for the steps to be taken to remedy or mitigate the effects of the EDI Breach and a basis for testing whether this has been achieved within the three (3) month period following the EDI Breach;

26.4.2 the GLA will notify the Grant Recipient as to whether the Remediation Plan is approved as submitted within ten (10) Business Days of its receipt;

26.4.3 if the Remediation Plan is not approved, senior representatives of the parties must meet as soon as practicable (and in any event within ten (10) Business Days of the GLA's notification under Condition 26.4.2 or such later date as the GLA may agree) to try to agree a revised Remediation Plan. In default of agreement, or where no Remediation Plan is submitted to GLA within the requisite timeframe, Condition 13.1.12 shall apply;

26.4.4 if the Remediation Plan is approved, the Grant Recipient must comply with the obligations set out in the Remediation Plan; and

26.4.5 within five (5) Business Days of the end of the three (3) month period from the date of the EDI Breach, senior representatives of the parties must meet to review the efficacy of the Remediation Plan in remedying or mitigating the effects of the breach. If in the opinion of the GLA (acting reasonably) the Remediation Plan has not been effective or has not been complied with, the GLA shall be entitled in its absolute discretion either to extend the timeframe for the Remediation Plan's operation or to declare that the Remediation Plan has failed in which case Condition 13.1.12 shall apply.

26.5 The parties acknowledge that they are both under a public sector equality duty pursuant to Section 149 of the Equality Act 2010 and they will assist and co-operate with each other in respect of each party's compliance with such duty including in respect of any amendment or re-enactment of Section 149 of the Equality Act 2010 and/or any guidance, enactment, order, regulation or instrument made pursuant to the same.

27 **Co-operation**

27.1 Each party undertakes to co-operate in good faith with the other to facilitate the proper performance of this Agreement and the delivery of the Named Projects. Without prejudice to the generality of the foregoing the Grant Recipient shall co-operate fully and in a timely manner with any reasonable request from time to time:

27.1.1 of any auditor (whether internal or external) of the GLA; and/or

27.1.2 of the GLA where the GLA is required under any legislation to provide any document relating to the Named Projects to any person.

28 **Dispute Resolution**

28.1 All disputes and differences arising out of or in connection with this Agreement including in relation to any non-contractual obligation (a **Dispute**) shall be resolved pursuant to the terms of this Condition 28.

28.1.1 In the event that the Grant Recipient or the GLA consider that a Dispute exists, such party shall serve a notice upon the other party (a **Notice of Dispute**) giving brief details of the Dispute and in the first instance the parties shall use their reasonable endeavours to resolve such Dispute amicably and in good faith and in accordance with this Condition 28.

28.1.2 Representatives of the parties shall meet within five (5) Business Days (or such other longer period not exceeding 20 (twenty) Business Days as the parties may agree) of receipt of a Notice of Dispute.

28.1.3 Where either no representatives of both parties are available to meet within the period set out in Condition 28.1.2 or the representatives fail to agree a unanimous resolution of the Dispute at such meeting, the Dispute shall be referred to the chief executives (or nominated deputies) of the Grant Recipient and the GLA (the **Senior Executives**).

28.1.4 The Senior Executives shall meet within ten (10) Business Days (or such other longer period not exceeding 20 (twenty) Business Days as the parties may agree) of such referral to attempt to resolve the Dispute. Any unanimous resolution of the Senior Executives shall be recorded in writing and signed by them and shall be final and binding unless the parties agree otherwise.

28.1.5 if the Dispute remains unresolved after ten (10) Business Days following referral to the Senior Executives, such Dispute must be dealt with in accordance with Condition 28.2.

28.2 In the circumstances contemplated in Condition 28.1.5, the parties will attempt to settle the Dispute by mediation in accordance with the CEDR Model Mediation Procedure. Unless otherwise agreed by the parties, the mediator will be nominated by CEDR. The parties agree that:

28.2.1 to initiate the mediation a party must give notice in writing (**ADR Notice**) to the other party to the Dispute requesting a mediation. A copy of the request should be sent to CEDR;

28.2.2 the mediation shall start not later than 28 (twenty eight) days after the date of the ADR Notice; and

28.2.3 except where the right to issue proceedings would be prejudiced by a delay, no party may commence any court proceedings in relation to any dispute arising out of this Agreement until it has attempted to settle the dispute by mediation and either the mediation has terminated or the other party has failed to participate in the mediation.

29 **Notices**

29.1 Any notice to be given hereunder shall be in writing and shall be sufficiently served if:

29.1.1 sent by electronic mail (but not by facsimile) in the case of either party to the other party's email address set out in Condition 29.3 provided that the party includes in the subject line of the email words sufficient to identify the contents of the email as a notice given under this Agreement; or

29.1.2 delivered by hand and receipted for by the recipient; or

29.1.3 sent by a recorded delivery service addressed:

(a) in the case of the GLA, to City Hall, Kamal Chunchie Way, London E16 1ZE;

(b) in the case of the Grant Recipient, to its registered office as set out at the beginning of this Agreement; or

(c) to such other addresses as either party may from time to time notify to the other by email or in writing provided that such other address is within England and Wales.

29.2 Any notice shall be deemed to be given by the sender and received by the recipient:

29.2.1 if sent by email, on the date that the email is received at the relevant email address set out in Condition 29.3;

29.2.2 if delivered by hand, when delivered to the recipient;

29.2.3 if delivered by a recorded delivery service, three (3) Business Days after delivery including the date of postage;

provided that if the delivery or receipt is on a day which is not a Business Day or is after 4 pm it is to be regarded as received at 9 am on the following Business Day.

29.3 The email addresses for service of notices given pursuant to Condition 29.2 are:

29.3.1 for the GLA:

(a) email address: roughsleepinghomes@london.gov.uk

29.3.2 for the Grant Recipient:

(a) email address: [xxxx]

or to such other email addresses as either party may from time to time notify to the other in writing to the other party's email addresses set out in this Condition 29.3.

30 **No fetter on statutory functions**

Notwithstanding anything apparently or impliedly to the contrary in this Agreement or any of the deeds and documents referred to herein, in carrying out its statutory duties or functions the discretion of the GLA shall not be fettered, constrained or otherwise unlawfully affected by the terms of this Agreement or any such other deed or document.

31 **No agency**

31.1 Nothing in this Agreement or otherwise shall be held, implied or deemed to constitute a partnership, joint venture or other association or, save as expressly provided, the relationship of principal and agent between the parties.

31.2 The Grant Recipient shall at all times be independent and nothing in this Agreement shall be construed as creating the relationship of employer and employee between the GLA and the Grant Recipient. Neither the Grant Recipient nor any of its employees shall at any time hold itself or themselves out to be an employee of the GLA.

32 **Exclusion of third party rights**

Except as otherwise expressly provided no person who is not a party to this Agreement shall be entitled to enforce any terms of this Agreement solely by virtue of the Contracts (Rights of Third Parties) Act 1999.

33 **Assignment and sub-contracting**

33.1 The GLA will be entitled to transfer or assign all or part of this Agreement.

33.2 The Grant Recipient will not be entitled to transfer or assign all or part of this Agreement without prior written consent from the GLA (to be provided or withheld in GLA's absolute discretion).

34 **Construction Industry Scheme**

34.1 In this Condition 34 the following definitions shall apply:

CIS means the provisions of chapter 3 of part 3 of the Finance Act 2004 together with any regulations made pursuant to those provisions including (without limitation) the Income Tax (Construction Industry Scheme) Regulations 2005;

Construction Contract has the same meaning as in Section 57(2) of the Finance Act 2004; and

34.2 The Grant Recipient warrants to the GLA that it holds gross payment status for the purposes of the CIS (pursuant to paragraph CISR13040 of the Construction Industry Scheme Reform manual or otherwise) such that the Grant Recipient is entitled to receive payments under Construction Contracts without any deduction under the CIS. The Grant Recipient undertakes to notify the GLA within two (2) Business Days of ceasing to hold gross payment status.

34.3 The Grant Recipient will, on demand, pay to the GLA an amount equal to any tax liability, interest or penalties imposed on the GLA under the CIS as a result of, or in connection with, any payments made by the GLA pursuant to this Agreement, together with any reasonable costs incurred by the GLA in connection with such tax liability, interest or penalty.

35 **Data Protection**

35.1 The parties acknowledge that they will each act in the capacity of Data Controller in respect of any Personal Data processed under this Agreement and each will Process the Personal Data as independent Data Controllers.

35.2 The Grant Recipient (including their employees agents or officers) shall at all times during the period of this Agreement comply with the provisions and obligations imposed by this Condition 35 and the Data Protection Legislation generally, including any requirement to obtain registrations, consents, and provide notifications and relevant privacy information to Data Subjects as required for the purposes of their obligations under this Agreement.

35.3 Whilst each party shall be responsible for responding to any complaint in relation to the Personal Data Processed pursuant to this Agreement, or any request by individuals to exercise the Data Subject's rights, the parties will co-operate with each other and provide reasonable assistance with any request, proceedings or inquiry by any affected Data Subject and/or the Information Commissioner.

35.4 Each party shall notify the other without undue delay on becoming aware of any breach of the Data Protection Legislation in relation to the Personal Data Processed under this Agreement.

36 **Further Assurance**

At any time upon the written request of the GLA the Grant Recipient:

36.1 shall promptly execute and deliver or procure the execution and delivery of any and all such further instruments and documents as may be necessary for the purpose of obtaining for the GLA the full benefit of this Agreement and of the rights and powers herein granted; and

36.2 shall perform and use its reasonable endeavours to procure that any third party performs such acts as may be reasonably required for the purposes of giving full effect to this Agreement.

37 **Entire agreement**

37.1 This Agreement and the conditions herein contained together with the Schedules constitute the entire agreement between the parties and may only be varied or modified by agreement of the parties in writing by deed.

37.2 The Grant Recipient hereby acknowledges that save as set out or referred to in the Agreement there are and have been no representations made by or on behalf of the GLA of whatsoever nature on the faith of which the Grant Recipient is entering into this Agreement.

38 **Severability**

If any term, condition or provision contained in this Agreement shall be held to be invalid, unlawful or unenforceable to any extent, such term, condition or provision shall to that extent be omitted from this Agreement and shall not affect the validity, legality or enforceability of the remaining parts of this Agreement.

39 **Cumulative rights and enforcement**

39.1 Any rights and remedies provided for in this Agreement whether in favour of the GLA or the Grant Recipient are cumulative and in addition to any further rights or remedies which may otherwise be available to those parties.

39.2 The parties acknowledge that money damages alone may not properly compensate the GLA for any breach of the Grant Recipient's obligations hereunder and the parties hereby expressly agree that in the event of the breach or threatened breach of any such obligation in addition to any other rights or remedies the GLA may have in Law, in equity or otherwise the GLA shall be entitled to seek injunctive or other equitable relief compelling specific performance of and other compliance with the terms of such obligations.

40 **Waiver**

40.1 Neither the failure of any party at any one time to enforce any provision of this Agreement nor the payments by the GLA of Named Project Grant under Condition 11.1 in any way affects the relevant party's right thereafter to require complete performance by the other party, nor may the waiver of any breach or any provision be taken or held to be a waiver of any subsequent breach of any provision or be a waiver of the provision itself.

40.2 Where in this Agreement any obligation of a party is to be performed within a specified time that obligation shall be deemed to continue after that time if the party fails to comply with that obligation within the time.

40.3 Any waiver or release of any right or remedy of either party must be specifically granted in writing signed by that party and shall:

40.3.1 be confined to the specific circumstances in which it is given;

40.3.2 not affect any other enforcement of the same or any other right; and

40.3.3 (unless it is expressed to be irrevocable) be revocable at any time in writing.

41 **Survival of this Agreement**

41.1 Insofar as any of the rights and powers of the GLA provided for in this Agreement shall or may be exercised or exercisable after the termination or expiry of this Agreement the provisions of this Agreement conferring such rights and powers shall survive and remain in full force and effect notwithstanding such termination or expiry.

41.2 Insofar as any of the obligations of the Grant Recipient provided for in this Agreement remain to be discharged after the termination or expiry of this Agreement the provisions of this Agreement shall survive and remain in full force and effect notwithstanding such termination or expiry.

41.3 Without limitation the provisions of Conditions 2.3, 5, 3.10, 5, 8.3, 8.5, 8.6, 8.8, 8.10, 9, 12, 13, 14, 17, 19.5, 20, 21, 22 , 23, 24, 28, 35, 43 and this Condition 41 and such other provisions of this Agreement as are necessary to give effect to such Conditions are expressly agreed by the parties to survive the termination or expiry of this Agreement.

42 **Execution**

42.1 This Agreement may be executed:

42.1.1 by the electronic application of a party's authorised signatory's signature and provision of an electronic copy of the same; and

42.1.2 in any number of counterparts and each counterpart will when executed be an original of this Agreement and all counterparts together will constitute one instrument.

43 **Governing law**

This Agreement shall be governed by and construed in accordance with the laws of England and Wales and subject to the provisions of Condition 28 the parties irrevocably submit to the exclusive jurisdiction of the courts of England and Wales.

44 **London Living Wage**

Without prejudice to any other provision of this Agreement, the Grant Recipient shall (and will ensure that its consultants, contractors and sub-contractors shall):

44.1 use all reasonable endeavours to ensure that no employees or workers engaged in the Delivery of the SHAP Dwellings is paid an hourly wage (or equivalent of an hourly wage) less than the London Living Wage;

44.2 use all reasonable endeavours to ensure that no employees or workers engaged in the Delivery of the SHAP Dwellings is paid less than the amount to which they are entitled in their respective contracts of employment; and

44.3 provide to the GLA such information concerning the London Living Wage as the GLA or its nominees may reasonably require from time to time.

Schedule 1

Agreed Principles

1 **Named Projects**

1.1 This Agreement contemplates the Delivery of four (4) types of Named Projects:

1.1.1 the acquisition of one or more dwellings which require no or minimal work in order to meet the SHAP Minimum Standards and are fit for occupation as SHAP Housing immediately following such acquisition (**Acquisition (No Work Required) Project)**;

1.1.2 the acquisition of one or more dwellings which require repairs to be undertaken before such dwellings meet the SHAP Minimum Standards and are fit for occupation as SHAP Housing (**Acquisition (Work Required) Project**);

1.1.3 the development of one or more new build dwellings (including by way of any MMC Project) to the SHAP Minimum Standards for use as SHAP Housing on a site either owned by the Grant Recipient or acquired by the Grant Recipient for this purpose (**New Build Project**); and

1.1.4 the remodelling of dwellings already owned by the Grant Recipient to the SHAP Minimum Standards to be used as SHAP Housing (**Social Housing Remodelling or Refurbishment Project**).

1.2 OPS will identify certain Milestones which must be achieved before Named Project Grant may be claimed pursuant to Condition 10.

1.3 Start on Site will be deemed to have been achieved for Acquisition (No Work Required) Projects and Acquisition (Work Required) Projects where a Completed Interest in the relevant Site has been acquired by the Grant Recipient.

2 **Secure Legal Interest**

2.1 The length and nature of Secure Legal Interest that the Grant Recipient must possess will depend on the type of Named Project it Delivers. At the point of submission of a proposed Named Project pursuant to Condition 7.2.2(a) the Grant Recipient must represent and warrant that in respect of any:

2.1.1 New Build Projects it possesses or will possess a Secure Legal Interest (Long Term); and

2.1.2 Acquisition (No Work Required) Projects, Acquisition (Work Required) Projects or Social Housing Remodelling or Refurbishment Projects it possesses or will possess either Secure Legal Interest (Long Term) or a Secure Legal Interest (Short Term).

2.2 Every Named Project must have a Secure Legal Interest which allows the Grant Recipient to achieve the Minimum Period of Use for each SHAP Dwelling comprised in the Named Project.

2.3 The Grant Recipient must, subject to paragraphs 2.4 and 2.5, have a Completed Interest in each Named Project before the Acquisition Tranche Grant may be claimed under Condition 10.1.

2.4 In exceptional circumstances the GLA may (in its absolute discretion) provide the Grant Recipient with a Drawdown Confirmation to permit the Grant Recipient to submit a claim for Acquisition Tranche Grant despite the Grant Recipient holding a Contractual Interest.

2.5 In permitting the Grant Recipient to hold a Contractual Interest at the point of claim for Acquisition Tranche Grant, the GLA may impose such Drawdown Conditions as it (in its absolute discretion) considers to be appropriate and require such Drawdown Conditions to be complied with within such timescales as may be determined by the GLA.

2.6 Other than where the GLA has provided the Drawdown Confirmation, the Grant Recipient must (at the point that it submits a claim for any Tranche pursuant to Condition 10) possess a Completed Interest and must represent and warrant to the GLA that it is either registered or has applied to register as the proprietor of the relevant Site at the Land Registry (other than where the Grant Recipient has a Non Registrable Lease).

3 SHAP Dwellings

3.1 Where the context requires, the obligations in this Agreement which apply to a Named Project will apply to each SHAP Dwelling in that Named Project.

3.2 Where a Substitute Dwelling is accepted by the GLA pursuant to Condition 16.3, such Substitute Dwelling shall, from the Substitute Dwelling Acceptance Date, be subject to the obligations in Condition 16.

4 Rent

The Grant Recipient will use reasonable endeavours to deliver the SHAP Dwellings in such a manner as to ensure that Tenants are not impacted by the Benefit Cap.

5 **Tenancy Support Services**

The Grant Recipient must promptly resolve any disputes between itself and any Tenancy Support Services Provider and acknowledges and agrees that the GLA will not arbitrate or otherwise be involved in any such disputes.

Schedule 2

Special Conditions

1 The Grant Recipient must use its reasonable endeavours to procure that each SHAP Dwelling is delivered within the boundary of its borough unless otherwise approved by the GLA on OPS.

2 [xxxx[1]]

[1] To be updated if any bespoke conditions are applicable.

Schedule 3

Representation and Warranties

1 **Powers, vires and consents**

1.1 It has the power to enter into and to exercise its rights and perform its obligations under this Agreement and has taken all necessary action to authorise the execution by it of and the performance by it of its obligations under this Agreement.

1.2 It is not subject and will not become subject to any other obligation, compliance with which will or is likely to, have a Material Adverse Effect in relation to the Approved Bid or any Named Project or Indicative Projects.

1.3 Its obligations under this Agreement constitute its legal, valid and binding obligations, enforceable in accordance with its terms.

1.4 The execution, delivery and performance by it of this Agreement do not:

1.4.1 insofar as it is aware contravene any applicable law or directive or any judgement, order or decree of any court having jurisdiction over it;

1.4.2 conflict with, or result in any breach of any of the terms of, or constitute a default under, any agreement or other instrument to which it is a party or any licence or other authorisation to which it is subject or by which it or any of its property is bound; or

1.4.3 contravene or conflict with standing orders or other constitutional documents binding upon it (as applicable) from time to time.

1.5 All consents, required by it in connection with the execution, delivery, issue, validity or performance or enforceability of this Agreement have been obtained and have not been withdrawn.

1.6 So far as it is aware, it is not in breach of or in default under any agreement to which it is a party or which is binding on it or any of its assets which has or could have a Material Adverse Effect.

1.7 To the best of its knowledge, no claim is presently being asserted and no litigation, arbitration or administrative proceeding is presently in progress or, to the best of its knowledge, pending or threatened against it or any of its assets which will or might have a Material Adverse Effect in relation to the Approved Bid or any Named Project.

1.8 It has not committed any Prohibited Act.

2 **Deliverability**

2.1 It has obtained or will by Completion of a Named Project have obtained all Consents and to the extent that such Consents have been obtained they have not been withdrawn.

2.2 It is not aware, after due enquiry, of anything which materially threatens the success or successful completion of the intention or purpose of this Agreement.

2.3 No Default Event has occurred and is continuing.

2.4 All information supplied by or on behalf of it to the GLA or its agents or employees in connection with the Grant Recipient's initial application for grant funding or in the course of the subsequent discussions was at the time of submission and as far as it was aware (or ought to have been aware) having made all reasonable and proper enquiries true, complete and accurate in all respects.

2.5 It has informed the GLA of any material change that has occurred since:

2.5.1 the date of submission of the proposed Approved Bid prior to the date of this Agreement; and

2.5.2 the Approved Bid, as the same may be amended, added to, supplemented, substituted or varied in accordance with this Agreement, on each occasion of its amendment, addition, supplementation, substitution or variation of which it is aware (or ought to be aware) having made all reasonable and proper enquiries which would render such information untrue, incomplete or inaccurate in any material respect including without limitation the provision or offer of any additional Public Sector Funding.

2.6 It is not aware of any material fact or circumstance that has not been disclosed to the GLA and which might, if disclosed materially, adversely affect the decision of anyone considering whether or not to contract with it.

2.7 The level of rent for any SHAP Dwellings will be set at a Social Rent or at an Affordable Rent (as applicable and set out in the Named Project Details).

2.8 All data or other information supplied to the Regulator or the GLA in connection with, or related to the Approved Bid or this Agreement is accurate.

2.9 The Grant Recipient will have a Secure Legal Interest in and be the immediate landlord of the Tenants of the SHAP Dwellings to be provided pursuant to this Agreement.

2.10 The Grant Recipient will hold Registered Provider status at the point at which any SHAP Dwelling provided pursuant to this Agreement is made available for rent.

2.11 None of the SHAP Dwellings provided pursuant to this Agreement are being subsidised by RTB Funds.

2.12 Save where expressly agreed by the GLA, no Named Project which is a Section 106 Project is being subsidised by Named Project Grant.

2.13 Save where expressly agreed by the GLA, all SHAP Dwellings have been let in accordance with the terms of the Approved Bid and the applicable Named Project Details.

2.14 So far as the Grant Recipient is aware (having made all reasonable enquiries) each Named Project (including, inter alia, all Milestones and associated dates) is capable of being delivered without the need for a change to the Approved Bid and the applicable Named Project Details.

2.15 The Grant Recipient will comply with the Good Practice Guide to Estate Regeneration where applicable.

2.16 The Grant Recipient has a Nominations Agreement with each applicable Nominating Body which:

2.16.1 complies with any applicable Legislation and any relevant policy or guidance specified by the GLA from time to time;

2.16.2 does not and will not conflict with or prejudice the efficacy of the operation of the Nomination Details or the terms of this Agreement;

2.17 The Grant Recipient has a Tenancy Support SLA with each Tenancy Support Services Provider which:

2.17.1 complies with any applicable Legislation and any relevant policy or guidance specified by the GLA from time to time;

2.17.2 does not and will not conflict with or prejudice the efficacy of the operation of this Agreement;

3 **Authority of Grant Recipient's Representative**

The Grant Recipient's Representative is empowered to act on behalf of the Grant Recipient for all purposes connected with this Agreement.

4 **Propriety**

4.1 No member, employee, agent or consultant of the Grant Recipient or of any partner organisation of the Grant Recipient has any personal, proprietary or pecuniary interest in:

4.1.1 any person from whom the Grant Recipient is purchasing land or property for the purposes of or in connection with this Agreement;

4.1.2 any contractor engaged or to be engaged by the Grant Recipient in connection with this Agreement;

4.1.3 any land or other property to be Delivered by the Grant Recipient for the purposes of or in connection with this Agreement.

4.2 No member, employee, agent or consultant of the Grant Recipient or any partner organisation of the Grant Recipient is, has or will be entitled to any preferential treatment by virtue of their position or associations whether in terms of:

4.2.1 access to Delivered pursuant to this Agreement; or

4.2.2 the prices at which such properties are let.

5 Local Government Act 1999

The Grant Recipient is not subject to any Section 15 Direction nor do any circumstances exist which would permit such a direction to be issued.

6 Local Government Finance Act 1988

No Section 114 Report has been made nor is the Grant Recipient aware of any circumstances which would give rise to the making of a Section 114 Report.

Schedule 4

Minimum Property Standards

In order to address the needs of the Programme Client Group, the parties have agreed that any SHAP Dwelling delivered by the Grant Recipient with the benefit of the Allocated Grant must meet the minimum property standards set out in this Schedule 4 and the parties acknowledge that such standards do not constitute a specification.

1 **Overarching Principles**

1.1 SHAP Dwellings must at all times comply in all respects with all aspects of Legislation and SHAP Minimum Standards.

1.2 SHAP Dwellings must not contain any Category 1 or 2 hazards under the Housing Health and Safety Rating System (England) Regulations 2005 pursuant to the Housing Act 2004 and associated guidance.

1.3 SHAP Dwellings must at all times comply in all respects with Legislation in relation to fire safety and any relevant fire safety guidance relating to the SHAP Dwellings as amended, updated or replaced from time to time. Where a SHAP Dwelling is a flat, all flats in the building and non-residential elements of the building of which it is part shall also conform to the appropriate fire safety requirements and fire safety guidance. See paragraph 2.2 below for further detail of the Mayor's Building Safety Standards.

1.4 All appropriate planning permissions and building control authorisation must be obtained for SHAP Dwellings. Proof of any required permissions and/or approvals must be obtained and kept on file for any SHAP Dwellings.

1.5 All SHAP Dwellings should comply with any appliable standards and/or design requirements set out in the London Plan.

1.6 All SHAP Dwellings must be appropriate for the needs of the tenant. SHAP Dwellings above restaurants, fast food outlets or commercial premises where hazardous substances are kept shall not be acceptable for the SHAP. Neither are flats above noisy, late night opening premises such as minicab offices, clubs or pubs acceptable for the SHAP. Purpose built flats above shops with exclusive access may be acceptable depending on the floor they are situated on.

1.7 Grant Recipient should ensure their properties meet a minimum energy efficiency standard of 'D' or higher if required by the GLA or the Legislation in force at the time. The sustainability standards outlined in the Bidding Prospectus must also be met.

1.8 All SHAP Dwellings must comply with the relevant requirements of the local authority including, for supported housing with commissioned support, compliance with the accommodation standards set out by support commissioners

1.9 All property standards are subject to changes in legislation from time to time. If a legislative change or any requirement of the Affordable Housing Capital Funding Guide imposes a new or higher standard than that expressly provided for in this Schedule, the higher standard shall apply as if it were incorporated within this Schedule. If a legislative change causes or

may cause a decline in the standards set out in this Schedule, the minimum property standards set out in this Schedule shall continue to apply.

1.10 This schedule sets out minimum standards and higher standards may be required by the GLA.

2 **Minimum Building Safety Standards**

2.1 The SHAP Dwellings must at all times comply in all respects with all relevant building safety standards and legislative requirements that were in force when the SHAP Dwellings were designed, constructed and, where applicable, refurbished, and which were intended to ensure their safe design, construction, occupation and building management. Where such standards and requirements change and/or are updated after completion of any construction or refurbishment work affecting the SHAP Dwellings, the revised standards and requirements should nonetheless be applied to the SHAP Dwellings in so far as these are reasonably applicable.

2.2 All of the Mayor's Building Safety Standards (set out below) must be met in any New Build Project. Acquisition (No Work Required) Projects, Acquisition (Work Required) Projects and Social Housing Remodelling or Refurbishment Projects and any other SHAP Dwelling delivered by the Grant Recipient with the benefit of the Allocated Grant which is not comprised in a New Build Project must comply with Standards 2, 4 and 5.

Standard 1	The following buildings must include Automatic Fire Suppression Systems, including (but not limited to) sprinklers: a. all purpose-built blocks of flats (including conversions) of any height; and b. all supported and specialist accommodation.
Standard 2	No combustible materials may be used in the external walls of any homes or buildings, regardless of their height [2]
Standard 3	All homes must include access to water supplies for firefighting in accordance with Water UK's national guidance document: https://www.water.org.uk/guidance/national-guidance-document-on-the-provision-of-water-for-firefighting-3rd-edition-jan-2007/
Standard 4	For all homes, investment partners must register any in-built electrical products, such as white goods, with the manufacturers' registration service. Investment partners must also encourage residents to register white goods with manufacturers for every product where it is possible to do so.
Standard 5	For all homes, investment partners must ensure that information about product registration, product recalls and electrical safety is made available to residents.

[2] This will only allow materials that are Class A2-s1 rated and above under the European classification system, as set out in the standard BS EN 13501-1 and as reflected in UK Building Regulations.

3 **Space standards**

3.1 All relevant Legislation and national policy must be complied with in relation to space standards.

3.2 The new London Plan and the Good Quality Homes for all Londoners London Plan Guidance set out clear policies and guidance on achieving high quality design and standards in housing, which partners are expected to adhere to when building new homes.

3.3 Full space standards are set out in the prospectus. For shared accommodation different space standards will apply, in line with all relevant policy, and to be agreed with the GLA. The Affordable Housing Capital Funding Guide sets out more information on space standards for different accommodation models which may apply to the SHAP Dwellings in Section 5.

3.4 Design standards set out in the prospectus must be met unless a specific exemption has been agreed by the GLA.

4 **Shared accommodation standards**

4.1 Shared accommodation must comply with all relevant Legislation and local standards and licensing requirements.

4.2 Sharing ratios for kitchen and bathroom facilities must be agreed with the GLA and in compliance with local policy.

4.3 Storage must be provided to keep tenants' personal belongings safe.

5 **Furniture and white goods**

5.1 Every SHAP Dwelling must include furniture and white goods and all furniture shall at all times comply in all respects with all aspects of relevant Legislation and SHAP Minimum Standards as amended, updated or replaced from time to time.

5.2 Any furniture left in any SHAP Dwelling shall be left at the landlord's own risk, for which no further payment will be made and no repairing responsibility accepted.

5.3 Carpets (or other suitable flooring) shall be provided. It shall have a good quality underlay, be clean, of reasonable quality and free from all defects. Laminate or other wooden flooring shall not be acceptable in flats above ground floor level unless the floor is of a solid concrete construction, because of potential noise disturbance.

5.4 Curtain rails shall be securely fitted above all windows and curtains shall be clean, free from defects and when drawn at night prevent external viewers seeing into the room concerned, net curtains shall be fitted to all windows. Blinds shall be accepted only following engagement with the GLA and its approval.

6 **Kitchens and bathrooms**

Every SHAP Dwelling must have appropriate provision or (in the case of shared accommodation) access to suitable kitchen and bathroom facilities.

7 **Suitability of accommodation for the tenant**

7.1 Accommodation must be assessed for its suitability in meeting the needs of residents – by commissioners, bodies making referrals, and landlords and managing agents of supported housing when referrals are made as relevant.

7.2 Accommodation should be appropriately located near to amenities and transport, supporting social inclusion.

7.3 There must be regular communication and collaboration between housing teams, landlords, managing agents, support staff in accommodation and commissioners of support services, to share information so that accommodation arrangements can be adapted as resources or residents' needs change

7.4 Pre-payment meters for gas and electricity must be avoided unless agreed by exception by the GLA.

8 **Property management**

8.1 Appropriate quality standards, procedures and processes, and response and repair times must be in place for both routine and emergency repairs.

8.2 There must be clear procedures for residents to report issues and raise complaints.

Schedule 5

Part 1

Project Costs

Heads of expenditure

1 **Acquisition**

1.1 Purchase price of land/site/buildings.

1.2 Stamp Duty Land Tax on the purchase price of land/site.

2 **Works Costs**

2.1 Main works contract costs (excluding any costs defined as on costs).

2.2 Major site development works (where applicable). These include piling, soil stabilisation, road/sewer construction, major demolition.

2.3 Statutory agreements, associated bonds and party wall agreements (including all fees and charges directly attributable to such works) where applicable.

2.4 Additional costs associated with complying with archaeological works and party wall agreement awards (including all fees, charges and claims attributable to such works) where applicable.

2.5 Irrecoverable VAT on the above (where applicable).

3 **On costs**

3.1 Legal fees and disbursements.

3.2 Net gains/losses via interest charges on development period loans.

3.3 Building society or other valuation and administration fees.

3.4 Fees for building control and planning permission.

3.5 Fees and charges associated with compliance with Legislation, and the GLA's requirements relating to energy rating of dwellings and Eco-Homes certification.

3.6 In-house or external consultants' fees, disbursements and expenses (where the development contract is a design and build contract) (see note below).

3.7 Insurance premiums including building warranty and defects/liability insurance (except contract insurance included in works costs).

3.8 Contract performance bond premiums.

3.9 Borrowing administration charges (including associated legal and valuation fees).

3.10 An appropriate proportion of the Grant Recipient's development and administration costs.

3.11 Irrecoverable VAT on the above.

3.11.1 **Note 1**

Where the development contract is a design and build contract, the on-costs are deemed to include the builder's design fee element of the contract sum. The amount included by the builder for design fees should be deducted from the works cost element referred to above, as should other non-works costs that may be submitted by the builder such as fees for building and planning permission, building warranty, defects liability insurance, contract performance bond and energy rating of dwellings.

3.11.2 **Note 2**

Some items will not qualify as Project Costs unless the Grant Recipient can clearly demonstrate that such costs are properly chargeable to the housing development, i.e. for the sole use of the residents or to comply with any statutory obligations that may have been imposed.

Examples of these are as follows:

(a) works to any roads which do not exclusively serve the housing development;

(b) landscaping to areas of land which lie outside the boundaries of the Site;

(c) district heating systems;

(d) trunk sewers and sewage disposal works;

(e) special refuse treatment buildings;

(f) public conveniences;

(g) community halls, club rooms, recreation rooms.

3.11.3 **Note 3**

Subject to the above, where any cost incurred or to be incurred by the Grant Recipient is common both to the development of the SHAP Dwelling within any Named Project and to any other activity, asset or property of the Grant Recipient, only such part of that cost as is attributable to the development of the SHAP Dwelling may be treated as a cost in respect of which grant under this Agreement may be paid.

Costs which are not Project Costs

1 **Capital costs incurred**

1.1 which are not eligible for social housing assistance as defined in Section 32(13) of the HRA 2008;

1.2 on land (forming part of the total site acquired) which will not be used exclusively for housing provision purposes directly related to the Named Project;

1.3 on estate offices, factories, letting offices;

1.4 on stores;

1.5 on medical or dental surgeries, clinics;

1.6 on police stations, public libraries, bus shelters;

1.7 on shops, restaurants, public houses, offices;

1.8 on transformer and other related buildings;

1.9 on maintenance depots, tools, plant and vehicles;

1.10 on garages (other than integral garages on market purchase scheme types) and greenhouses;

1.11 on separate commercial laundry blocks and related equipment.

Schedule 6

Legal Opinion

[TO BE TYPED ON COUNCIL NOTEPAPER]

Our ref [ ]

Your ref [ ]

Date [ ]

Email address [ ]

Greater London Authority
City Hall
Kamal Chunchie Way
London
E16 1ZE

To: Greater London Authority (the GLA)

Dear Sirs,

Legal Opinion re Single Homelessness Accommodation Programme (SHAP) Grant Agreement and related matters

I refer to the proposed SHAP Grant Agreement to be entered into between [ ] (the **Council**) and the GLA (the **Agreement**) for the purposes of, inter alia, providing affordable housing which is dated on or about the date hereof. In connection with the giving of this opinion, I have examined:

1 the Agreement in its final form prior to execution and delivery thereof by the Council;

2 the Council's Standing Orders for approving entry into and the execution and delivery of contracts by the Council and for the delegation of its authority and the powers of the Council's Executive; and

3 such other documents I consider appropriate for the purposes of giving this opinion.

I do not express any opinion as to, nor have I investigated the law of any jurisdiction other than England.

I am of the opinion that, as at the date hereof, as a matter of English law, the Council has the power and authority to enter into, observe and perform the terms and obligations on its part to be observed and performed by it under the Agreement and has taken all necessary action and has obtained all relevant consents and approvals (statutory or otherwise) to authorise the execution and delivery of the Agreement and the performance and validity of the obligations under it.

Neither the execution and the delivery of, nor the performance by the Council of its obligations under the Agreement will violate any provisions of any existing application law, rule, regulation or agreement binding on the Council, and the Agreement constitutes a valid and legally binding obligation on the Council enforceable in accordance with its terms. I have given this opinion, taking into account the common law and statutory duties applicable to the exercise of power by the Council.

The above opinions are subject to the reservation that under English law, the power of the court to order or pursue performance of an obligation and any other equitable remedies is discretionary and, accordingly, an English court might make an award of damages where specific performance of an obligation at work or remedy is sought.

This opinion is given by virtue of my position as Solicitor to the Council and is only given as the holder of that office. I am not giving this opinion in a personal capacity, nor do I accept any private or personal liability for any error or omission in it or which may arise therefrom and the recipient, in seeking to place reliance on the contents of this letter, must duly acknowledge the same if any error or omission is later to be found. This opinion is addressed to the GLA and is solely for its benefit. It may not be disclosed to or relied upon by any other person or made public in any way without my prior consent. This opinion is limited to matters addressed herein and is not to be read as an opinion with respect to any other matter.

Yours faithfully

Council Solicitor

There follows the specimen electronic signatures and titles of those who will or may attest the execution of the Agreement referred to above.[3]

Name	Title	Specimen Signature

[3] Please note that the Legal Opinion will not be in a form satisfactory to the GLA unless the person executing the Agreement is identified in this table.

This Agreement has been executed as a deed and is delivered and takes effect on the date stated at the beginning of it.

[**EXECUTED** as a **DEED** by affixing)
the common seal of the)
GREATER LONDON AUTHORITY)
In the presence of:

Authorised Signatory]

[DN: Include if using wet ink signatures]

[**EXECUTED** and delivered)
for and on behalf of the)
GREATER LONDON AUTHORITY by:)

Authorised Signatory

……

NAME (BLOCK)

……

Position

……

Authorised Signatory

……

NAME (BLOCK)

……

Position]

[DN: include if using electronic signatures]

[Grant Recipient]

EXECUTED as a **DEED** by affixing **THE COMMON SEAL** of **[LOCAL AUTHORITY]** In the presence of:)

……
Authorised Officer

Print Name:

This page is intentionally left blank

dated **2023**

[ ]

and

The Greater London Authority

Revenue Funding Agreement

in relation to the provision of funding for the support provided in relation to SHAP Dwellings under the Single Homelessness Accommodation Programme

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Funding agreement

dated **2023**

Parties

(1) **The Greater London Authority** whose principal offices are City Hall, Kamal Chunchie Way, London E16 1ZE (the **GLA**); and

(2) **[ ]** (company number [ ]) whose registered office is at [ ] (the **Recipient**).

Introduction

(A) The Recipient requested funding from the GLA and provided to the GLA a proposal for the use of such funding.

(B) Under its powers under sections 30 and 34 Greater London Authority Act 1999 to do anything it considers will facilitate or which is conducive or incidental to the promotion of economic, social development and wealth creation in Greater London, the GLA wishes to assist the Recipient in the provision of support services for the Programme Client Group by the provision of the GLA Funding to the Recipient.

(C) This Agreement sets out the terms and conditions upon which the GLA will make the funding available to the Recipient.

(D) The provision of the GLA Funding amounts to a conditional gift and is therefore not subject to VAT. If, at any time, it is held by the UK government to be subject to VAT, then the Recipient agrees and acknowledges that the GLA Funding shall have included any and all applicable VAT.

(E) This Agreement together with statutory and other instruments constitutes an entrustment of a public service obligation (in compliance with the Subsidy Control Requirements) from the GLA to the Recipient to provide support services to Tenants of accommodation for residents in London who are failed by the housing market.

(F) The grant funding provided under this Agreement is (at its date):

(a) where the Recipient is a Local Authority, structured not to give rise to Subsidy; and

(b) for all other Recipients, made in compliance with the subsidy scheme "Single Homelessness Accommodation Programme (SHAP)" (SC10764) created by the GLA and published on 21 December 2022 and as such constitutes a legacy subsidy pursuant to section 48(1)(a) of the Subsidy Control Act 2022.

(G) In this Agreement capitalised terms shall have the meaning prescribed to them in clause 1.

Agreed terms

1 **Definitions and interpretations**

1.1 In this Agreement the following terms have the following meanings unless inconsistent with the context:

Additional Revenue Project means a Revenue Project proposed by the Recipient under clause 2.3 in addition to the Original Revenue Project;

Affordable Housing Capital Funding Guide means the guide of that name published on www.london.gov.uk/CFG or any successor guide so published subject to such amendments variations or updates to the same as may be published from time to time;

Affordable Rent means a rent to be assessed and set in accordance with the applicable requirements of Legislation and the Rent Standard which represents the lower of:

(a) 80% of the market rent (inclusive of service charges) for an equivalent property of the relevant size and location located in the Broad Market Rental Area in which the relevant SHAP Dwelling is located; or

(b) the relevant Local Housing Allowance figure (plus service charge) for an equivalent property located in the Broad Market Rental Area in which the relevant SHAP Dwelling is located,

(unless the relevant SHAP Dwelling qualifies as Exempt Accommodation in which case the above limb (b) shall apply);

Agreement means this Single Homelessness Accommodation Programme Revenue Funding Agreement (including its Schedules, Annexures and Appendices (if any));

Agreement Funding means any funding given to the Recipient by the GLA under the provisions of this Agreement;

Agreement Information means:

(a) this Agreement in its entirety (including from time to time agreed changes to the Agreement); and

(b) data extracted from the claims made under this Agreement which shall consist of the Recipient's name, the expenditure account code, the expenditure account code description, the document number, the clearing date and the claim amount;

Alternative Tenancy Support Service Agreement means a new Tenancy Support Services Agreement or updated Tenancy Support Specification (with any incoming Tenancy Support Services Provider notified to the GLA in OPS) in a form acceptable to the GLA which does not disrupt the provision of Tenancy Support Services for the relevant Tenant(s);

Benchmark Rent Levels means the rent levels set out below as the same are updated and increased for each successive Financial Year in accordance with the methodology set out in the agreement or letter (as applicable) governing the terms of the Capital Project between the landlord of the relevant SHAP Dwelling and the GLA:

Number of bedrooms	2022/2023 Benchmark Rent Level (weekly rent, exclusive of service charges)
Bedsit and one bedroom	£168.34
Two bedrooms	£178.23
Three bedrooms	£188.13
Four bedrooms	£198.03
Five bedrooms	£207.93
Six or more bedrooms	£217.82

Bidding Prospectus means the "Single Homelessness Accommodation Programme prospectus" dated December 2022 published at https://www.london.gov.uk/programmes-strategies/housing-and-land/increasing-housing-supply/funding-supported-and-specialist-housing and any updates published or issued from time to time in relation thereto;

Broad Market Rental Area has the meaning specified in paragraph 4 of schedule 3B Rent Officers (Housing Benefit Functions) Order 1997, or article 3 Rent Officers (Universal Credit Functions) Order 2013 as appropriate;

Business Day means any day other than a Saturday, Sunday or a statutory bank holiday in England;

Capital Project means:

(a) a project for the delivery of one or more dwellings to accommodate individuals from the Programme Client Group which has been accepted by the GLA on OPS as eligible for capital grant funding from the GLA; or

(b) a Nil Capital Grant Project;

Capital Project Details means the descriptive and other details in respect of a Capital Project as accepted by the GLA through OPS (as the same may be varied from time to time in accordance with the terms of this Agreement);

Caseload Spaces (Actual) means the number of SHAP Dwellings which have actually been made available for occupation;

Caseload Spaces (Claimed) means SHAP Dwellings in respect of which GLA Funding has been claimed by the Recipient under this Agreement;

Caseload Spaces means the SHAP Dwellings anticipated to be made available for occupation;

Claim means the details of the quantum of GLA Funding requested by the Recipient to reimburse Expenditure Incurred to be submitted on OPS to the GLA by the Recipient in accordance with Schedule 1;

Claim Date(s) mean the dates identified on OPS on which the Recipient is eligible to claim a Grant Payment with respect to a Revenue Project;

Competent Authority means (as the case may be):

(c) such persons officeholders and bodies (however constituted) that are specified under any Subsidy Control Requirements as having responsibility for monitoring compliance with and/or legally enforcing Subsidy or the Subsidy Control Requirements or otherwise authorised to recover any Unlawful Subsidy; or

(d) the courts of England and Wales;

Data Protection Legislation means the UK GDPR, the Data Protection Act 2018 and any other relevant national Legislation implementing or supplementing the UK GDPR, and any formal guidance or Codes of Conduct issued by the Information Commissioner (or other Relevant Authority) in each case as amended, superseded or replaced from time to time;

Default Event means the occurrence of any event listed under clause 7.1;

Delivery and Operational Obligations means the obligations set out in clause 2.10;

DLUHC means the Department for Levelling Up, Housing and Communities (or any successor body with similar or equivalent jurisdiction or authority);

Enterprise means an entity or a group of entities constituting a single economic entity, regardless of its legal status, that is engaged in an economic activity by offering goods or services on a market;

Exempt Accommodation has the meaning attributed to it in para 4(10), of Schedule 3 Housing Benefit and Council Tax Benefit (Consequential Provisions) Regulations 2006;

Expenditure Incurred means expenditure incurred by the Recipient in delivering the Project Objectives in respect of which the Recipient has received relevant goods and services or in respect of which it has entered into contractual obligations (including but not limited to obligations under a Tenancy Support Services Agreement and/or the Recipient's own staff contracts), for which payment has been made or is due to be made;

Financial Event means the occurrence of any of the following:

(a) in relation a Recipient that is not a local authority:

i it is unable or admits an inability to pay its debts as they fall due, suspends making payments on any of its debts or, by reason of actual or anticipated financial difficulties, commences negotiations with one or more of its creditors with a view to rescheduling any of its indebtedness;

ii the value of its assets is less than its liabilities (taking into account contingent and prospective liabilities);

iii a moratorium is declared in respect of any indebtedness and/or any moratorium pursuant to Section 145 of the HRA 2008;

iv any corporate action, legal proceedings or other procedure or step is taken in relation to:

A the suspension of payments, a moratorium of any indebtedness, winding-up, dissolution, administration or reorganisation (by way of voluntary arrangement, scheme of arrangement or otherwise) other than a solvent liquidation or reorganisation on terms previously approved by the GLA (such approval not to be unreasonably withheld or delayed);

B a composition, compromise, assignment or arrangement with any of its creditors;

i the appointment of a liquidator (other than in respect of a solvent liquidation on terms previously approved by the GLA, such approval not to be unreasonably withheld or delayed), receiver, administrative receiver, housing administrator, administrator, compulsory manager or other similar officer;

ii enforcement of any Security over any assets of the Recipient;

iii any analogous procedure or step is taken in any jurisdiction;

v other than any winding-up petition which is frivolous or vexatious and is discharged, stayed or dismissed within ten (10) Business Days of commencement; or

vi any expropriation, attachment, sequestration, distress or execution affects any asset or assets of the Recipient which has a Material Adverse Effect;

(b) in relation to a Recipient that is a local authority, the Recipient is subject to a Section 15 Direction and/or Section 114 Report which has or will have a Material Adverse Effect;

FOIA has the meaning given to it in clause 15.2;

Force Majeure Event means any of the following:

(a) riot;

(b) civil unrest;

(c) war;

(d) act of terrorism;

(e) threat or perceived threat of act of terrorism;

(f) fire;

(g) earthquake;

(h) extraordinary storm;

(i) flood;

(j) abnormal weather conditions or other natural catastrophe or strikes; or

(k) lock-outs or other industrial disputes,

to the extent that such event has materially affected the ability of the affected party to perform its obligations in accordance with the terms of this Agreement but excluding any such event insofar as it arises from or is attributable to the wilful act, omission or negligence of the affected party or the failure on the part of the affected party to take reasonable precautions to prevent such Force Majeure Event or its impact;

Funding CPs means the conditions precedent to each Claim submitted by the Recipient as identified in clauses 4.1.1 to 4.1.8(b);

Funding Period means the period agreed by the GLA in OPS during which the Recipient is entitled to submit Claims in respect of each Revenue Project (as the same may be varied on OPS in accordance with this Agreement from time to time);

Funding Profile means the maximum amount of GLA Funding payable in respect of each Revenue Project in each Quarter of each Financial Year in the Funding Period as set out in OPS;

Funding Review Trigger means the circumstances set out in clause 11.7;

GLA Funding means [xxx] pounds sterling (£[xxx]) being the maximum amount of grant payable by the GLA to the Recipient in respect of the Original Approved Bid and any Additional Revenue Project(s) accepted by the GLA in OPS pursuant to clause 2.4 (as the same may be amended from time to time in accordance with the terms of this Agreement);

GLA's Representative means any person nominated by the GLA from time to time to be its representative for any matters relating to this Agreement;

Grant Payment means a payment of the GLA Funding which may be claimed by the Recipient in accordance with Schedule 1 in arrears during the Funding Period to reimburse Expenditure Incurred (subject always to clause 4 below);

HRA 2008 means the Housing and Regeneration Act 2008;

Identified Project means a Revenue Project in respect of which the:

(a) Recipient is the Tenancy Support Services Provider; or

(b) GLA has identified in writing and/or in OPS that such Revenue Project is complex and/or novel and will be treated as an "Identified Project";

Indicative Project means the Recipient's proposals for of a specified number of proposed SHAP Dwellings which has been accepted by the GLA on OPS;

Indicative Project Details means the descriptive and other details in respect of each Indicative Project as accepted by the GLA through OPS (as the same may be varied from time to time in accordance with the terms of this Agreement);

Indicative SHAP Dwelling means a proposed SHAP Dwelling comprised within an Indicative Project;

Information Commissioner means the "Information Commissioner" set out in section 114 Data Protection Act 2018 and for the avoidance of doubt is the UK's independent body set up to uphold and enforce information rights from time to time;

Insecurely Housed means the relevant individual is occupying hostel accommodation or other insecure accommodation;

Intellectual Property Rights means copyright, patents, registered and unregistered trade marks, registered and unregistered designs and all other industrial and intellectual property rights anywhere in the world whether registered or unregistered and including any applications for any of those rights;

Investment Partner means an organisation which has been confirmed by the GLA as having "Investment Partner Status" (whether on a full or restricted basis) under the GLA's Investment Partner qualification procedure from time to time;

Legislation means:

(a) any Act of Parliament;

(b) any subordinate legislation within the meaning of Section 21(1) of the Interpretation Act 1978;

(c) any exercise of the Royal Prerogative; and

in each case in the United Kingdom; and

(d) any regulations, orders, bye-laws, regulatory policy, guidance or codes of practice of any local or statutory authority or Competent Authority (as the case may be) having jurisdiction over the territory in which the Revenue Project is situated;

Local Authority RP means an English local authority entered on the Register pursuant to paragraph 3 of the Housing and Regeneration Act 2008 (Registration of Local Authorities) Order 2010;

Local Housing Allowance means an allowance determined in accordance with article 4B and schedule 3B to the Rent Officers (Housing Benefit Functions) Order 1997, or article 4 and schedule 1 to the Rent Officers (Universal Credit Functions) Order 2013, as appropriate;

London Affordable Rent means either:

(a) a weekly rent which does not exceed the Benchmark Rent Level (exclusive of service charges); or

(b) an Affordable Rent,

for an equivalent property of the relevant size and number of bedrooms such rent to be assessed and set in accordance with the applicable requirements of the Affordable Housing Capital Funding Guide, Legislation, the Rent Standard and any other relevant guidance issued by the Regulator (as any of the same may be amended, replaced or updated from time to time);

London Living Wage means the basic hourly wage (before tax, other deductions and any increase for overtime) calculated annually by the Resolution Foundation and overseen by the Living Wage Commission, or any successor body carrying out the relevant calculation as such hourly wage may be updated from time to time

Material Adverse Effect means the effect of any event or circumstance which is reasonably likely to be materially adverse to the ability of the Recipient to deliver an Indicative Project or a Revenue Project (as the context requires) on the basis agreed under this Agreement and/or within the time limits (if any) for doing so;

Milestone means each stage in the delivery of a Revenue Project agreed by the parties and set out in OPS;

Milestone Date means the date agreed by the GLA through OPS by which the relevant Milestones must have been achieved (as the same may be extended by the GLA pursuant to clause 11.3);

Milestone Failure means a failure by the Recipient fully to achieve any Milestone by the relevant Milestone Date

Nil Capital Grant Project means a project of one or more dwellings to accommodate individuals from the Programme Client Group which has been accepted by the GLA on OPS but in respect of which capital grant funding for the relevant project was not sought from the GLA under the SHAP;

Nominating Body means the referral body or agency identified on OPS and approved by the GLA in the Project Details;

Nomination Agreement means the agreement or other arrangement between the landlord of the SHAP Dwelling and the Nominating Body in respect of nominations or referrals of the Project Client Group to the SHAP Dwellings;

Nomination Details means such details of the referral and nomination arrangements as have been agreed by the GLA and set out in the Project Details;

OPS means the "GLA Open Project System", being the GLA's on-line investment management system from time to time or any successor system;

OPS ID Number means the identification number of the Revenue Project in which the relevant SHAP Dwelling is comprised;

Original Approved Bid means the aggregate of the proposed Revenue Projects approved by the GLA in OPS at the date of this Agreement;

Original Revenue Project means the Revenue Projects comprised within the Original Approved Bid;

Policy Statement on Rents for Social Housing means the "Policy Statement" published on 14 December 2022 by DLUHC, as such document and/or associated guidance may be amended, updated or replaced from time to time;

Private Registered Provider means a body entered on the Register as a non-profit organisation or a profit-making organisation (as such terms are defined in Section 115 of the HRA 2008);

Pro-Rated Amount means the sum of the following calculation:

$$\frac{GFC}{NSU(Profiled)} \text{ x } (NSU(Profiled) - NSU\ (Actual))$$

Where:

GFC = amount of GLA Funding claimed at the point that a Funding Review is undertaken pursuant to clause 11.7

NSU (Profiled) = the number of Caseload Spaces (Claimed) immediately prior to the date that the Funding Review is undertaken pursuant to clause 11.7.2

NSU (Actual) = the number of Caseload Spaces (Actual) immediately prior to the date that the Funding Review is undertaken pursuant to clause 11.7

Procurement Law means the Public Contracts Regulations 2015, the Concession Contracts Regulations 2016 (insofar as the same are applicable) together with any statutory modification or replacement regulations or Legislation on procurement by public bodies;

Programme Client Group means individuals from any of the following groups:

(a) Rough Sleepers; or

(b) Vulnerable Young Person;

that have been nominated as a Tenant by the relevant Nominating Body;

Project Client Group means in relation to a Revenue Project:

(a) such category of individual within the Programme Client Group (including any more specific eligibility requirements agreed by the parties) as is set out in the Project Details at the date of this Agreement; or

(b) such other Programme Client Group as the parties may agree in respect of a Revenue Project accordance with this Agreement;

Project Audit means the procedure (in a form advised by the GLA from time to time) by which the GLA reviews and audits:

(a) the usage of the GLA Funding claimed under this Agreement;

(b) the standard of the Tenancy Support Services delivered pursuant to this Agreement; and

(c) any evidence or information (including any Project KPI Data) provided to the GLA pursuant to paragraph 1 of schedule 1 to substantiate a Claim;

Project Details means the budget, descriptive and other details in respect of the Project Objectives of a Revenue Project as accepted by the GLA through OPS (as the same may be varied from time to time in accordance with the terms of the Agreement);

Project KPI Data means project information to be submitted by the Recipient via the GLA's OPS system, or such other method specified by the GLA from time to time, against the key performance indicators set out in Schedule 3 to this Agreement and such other performance indicators (if any) as may be agreed between the parties, whether in OPS or such other method specified by the GLA from time to time, in relation to a particular Revenue Project, including but not limited to, the number of clients supported and housed within the period, voids, tenancy ends and "move ons";

Project Objectives means the Recipient delivering, or procuring the delivery of, the provision of the Tenancy Support Services (subject to any amendments agreed in accordance with the terms of the Agreement);

Project Monitoring Meetings means quarterly meetings between the Recipient and the GLA in relation to an Identified Project;

Project Report means a written report, substantially in the form set out at Schedule 6 for the relevant Revenue Project, which sets out (inter alia)

(a) the Recipient's activities and progress in relation to meeting the Project Objectives and/or Milestones;

(b) project risks and issues and the steps the Recipient is taking to mitigate these;

(c) performance against agreed project outcomes during the preceding Quarter;

(d) summary of any serious incidents which occurred within the relevant Quarter, including incident type, narrative of incident and steps taken by the Tenancy Support Service Provider (and/or other relevant stakeholders) in response to the incident;

(e) summary of any complaints or appeals which occurred within the preceding Quarter;

(f) details of a case study demonstrating the Recipient's activities with regard to a particular Tenant;

(g) any other information that the GLA may request from time to time in connection with any Revenue Project;

Quarter means the period between each Quarter Date;

Quarter Date means 31 March, 30 June, 30 September or 31 December;

Public Sector Funding means all funding or subsidy in relation to any Revenue Project in money or money's worth received or receivable by the Recipient from public sector bodies including for this purpose funding from the European Commission, government bodies (whether national or local), or bodies in receipt of lottery funds from the National Lottery Distribution Fund pursuant to the National Lotteries Acts 1993 and 1998 and any further funding by the GLA not provided under this Agreement;

Recipient Affiliate means any:

(a) any Tenancy Support Services Provider, agent, employee or subcontractor of the Recipient; and

(b) in the case of a Recipient that is:

i not a local authority, any subsidiary or holding company of the Recipient or any subsidiary to any such holding company as subsidiary and holding company are defined in Section 1159 of the Companies Act 2006;

ii a local authority, any subsidiary, associate or joint venture in which a local authority has a material interest sufficient to require group financial statements to be prepared which account for these interests, in accordance with CIPFA's Code of Practice on Local Authority Accounting in the United Kingdom 2017/18 (as amended or updated) which is the Statement of Recommended Practice on local authority accounting or any code or other document which replaced it as the Statement of Recommended Practice;

Recipient's Chief Financial Officer has the meaning given to it in paragraph 1 of Schedule 1;

Recipient's Representative means the representative of the Recipient responsible for ensuring the effective delivery and management of a Revenue Project;

Recipient's Responsible Procurement Plan has the meaning given to it in clause 13.3.5;

Reduction Amount means the sum of the following calculation:

$$\frac{GFA}{NSU(Forecast)} \text{ x } (NSU(Forecast) - NSU\ (Anticipated))$$

Where:

GFA = the GLA Funding amount;

NSU (Forecast) = the number of Caseload Spaces (as set out in the Project Details immediately prior to the Funding Review being undertaken pursuant to clause 11.7)

NSU (Anticipated) = the number of Caseload Spaces forecast by GLA (acting reasonably) to be delivered in connection with the Funding Review undertaken pursuant to clause 11.7.2

Register means the register maintained by the Regulator pursuant to section 111 Housing and Regeneration Act 2008;

Registered Provider means either:

(a) a Private Registered Provider; or

(b) a Local Authority RP;

Regulator means the Regulator of Social Housing established pursuant to chapter 2 of part 2 of Housing and Regeneration Act 2008 or any similar future authority (including any statutory successor) carrying on substantially the same regulatory or supervisory functions;

Rent Standard means any standard in relation to rent set by the Regulator from time to time under Section 194 of the HRA 2008, the Policy Statement on Rents for Social Housing, and any other associated explanatory notes or guidance;

Responsible Procurement Policy means the GLA Group Responsible Procurement Policy in place from time to time and the current version of which can be obtained from the GLA;

Revenue Project means a project for SHAP for the provision of the Tenancy Support Services which has been accepted by the GLA on OPS;

Review Meeting has the meaning given to it in clause 12.7;

Rough Sleepers means individuals who are or will be aged over 18 when they are granted a tenancy or licence of the relevant SHAP Dwelling and either:

(a) in the reasonable opinion of the Recipient are homeless and are Sleeping Rough or have demonstrable history of Sleeping Rough in the immediate past;

(b) do not fall within limb (a) above but in the Recipient's reasonable opinion:

i are Insecurely Housed; and

ii require support services to maintain an independent and settled lifestyle;

Safeguarding and Serious Incidents Policy means the GLA Rough Sleepers' Services Safeguarding and Serious Incident Policy appended at Schedule 5;

Section 15 Direction means a direction made by the Secretary of State under Section 15 Local Government Act 1999;

Section 114 Report means a report made under Section 114(3) or Section 114A Local Government Finance Act 1988;

SHAP Dwelling means a dwelling which meets the description of SHAP Housing and has been accepted by the GLA within an Indicative Project or a Capital Project on OPS and is identified in the relevant Indicative Project Details or Capital Project Details as forming part of a Revenue Project;

SHAP Housing means subsidised housing that will be made available to individuals within the Programme Client Group at either a:

(a) London Affordable Rent; or

(b) Social Rent;

SHAP Support Guidelines means the publication entitled "Single Homelessness Accommodation Programme Support Guidelines" issued by the GLA in December 2022 (as updated, amended or replaced from time to time) published at https://www.london.gov.uk/media/99697/download?attachment;

Single Homelessness Accommodation Programme or **SHAP** means the GLA's Single Homelessness Accommodation Programme as described in the Bidding Prospectus and any updates published or issued from time to time in relation thereto;

Sleeping Rough means the relevant individual is sleeping outside (including bedding down for the night on the street) or sleeping in a non-residential building or other location not designed for human habitation;

Social Rent means a rent calculated in accordance with the formula and related provisions for calculating social rents set out in the Rent Standard;

Special Conditions means such conditions (if any) as are set out in Schedule 4 to the Agreement;

SPEI Allowable Costs means those costs incurred by the Recipient in undertaking the Project Objectives in respect of the SHAP Dwellings as specified in OPS (calculated using generally acceptable accounting principles) as follows:

(a) those direct costs incurred by the Recipient in undertaking the Project Objectives in respect of the SHAP Dwellings;

(b) a proper proportion of costs if these are shared between SHAP Dwellings and other dwellings on sites where the SHAP Dwellings are situated; and/or

(c) other costs permitted under the Subsidy Control Requirements of undertaking the Project Objectives in respect of the SHAP Dwellings,

in each case calculated using generally acceptable accounting principles;

SPEI Assignment means the assignment to the Recipient (other than where it is a local authority) of the delivery of the Tenancy Support Services, the details of which are set out at Schedule 7 of this Agreement as required under section 29 of the Subsidy Control Act 2022;

SPEI Necessary Subsidy means under the Subsidy Control Requirements the maximum amount of Subsidy which may be provided without Unlawful Subsidy arising;

SPEI Overpayment means the extent to which Public Sector Funding (together with the Agreement Funding) exceeds the SPEI Necessary Subsidy;

SPEI Revenue means all income (including all Public Sector Funding but excluding GLA Funding) which the Recipient or a Recipient Affiliate receives for the purposes of or earns from undertaking the Project Objectives;

Subsidy means any direct or indirect financial assistance which:

(a) arises from the resources of the United Kingdom Government, devolved government, other public authority in the United Kingdom or an emanation of any of these, including:

i a direct or contingent transfer of funds such as direct grants, loans or loan guarantees;

ii the forgoing of revenue that is otherwise due;

iii the provision of goods or services, or the purchase of goods or services; or

iv a measure analogous to these,

(b) confers an economic advantage on one or more Enterprises;

(c) is specific insofar as it benefits, as a matter of law or fact, certain Enterprises over others in relation to the production of certain goods or services; and

(d) has, or could have, an effect on trade or investment between the United Kingdom and any part of the European Economic Area and/or any other country or countries which the United Kingdom has entered into a trade agreement with which has provisions in respect of public sector funding arrangements;

Subsidy Control Requirements means the Subsidy Control Act 2022 and/or such other Legislation and/or regulations and/or guidance issued by the Secretary of State and/or approved by Parliament which is in force and/or applies in England which regulates Subsidy and applies to the GLA Funding and any other Public Sector Funding, including (but not limited to):

(a) the terms of the Trade and Cooperation Agreement between the European Union, European Atomic Energy Community and the United Kingdom of Great Britain and Northern Ireland to the extent they are applicable in England;

(b) European Union (Withdrawal Agreement) Act 2020; and

(c) European Union (Future Relationship) Act 2020;

Subsidy Review means a review by the GLA of the provision of Agreement Funding to determine whether its use by the Recipient is in compliance with the Subsidy Control Requirements and/or has given rise to Unlawful Subsidy and/or (where the Recipient is not a local authority) SPEI Overpayment;

Substitute SHAP Dwelling means a dwelling which the Recipient proposes to deliver as SHAP Housing pursuant to clause 25 in substitution for a SHAP Dwelling;

Tenancy Support Service Agreement means an agreement entered into between the Recipient and the Tenancy Support Services Provider for the provision of tenancy support services to Tenants;

Tenancy Support Services means such tenancy support services and other activities (of such types as described in the SHAP Prospectus) to be provided in respect of tenants within the Project Client Group housed in SHAP Dwellings (in each case as more particularly described in the Project Details) for at least the Funding Period to ensure that, as a minimum, the requirements of this Agreement are met;

Tenancy Support Services Provider means the organisation providing the Tenancy Support Services (who may or may not be the Recipient), as identified in the Project Details prior to the first Claim for GLA Funding under this Agreement;

Tenancy Support SLA means either:

(a) a Tenancy Support Service Agreement; or

(b) where the Tenancy Support Services Provider is the Recipient, a Tenancy Support Specification;

which (unless the Tenancy Support Services Provider is also the landlord of the relevant SHAP Dwellings) obliges the Tenancy Support Services Provider to have a housing management contract in place with the landlord of such dwellings;

Tenancy Support Specification means a written specification which:

(a) identifies the delivery model and standards it will apply in respect of the Tenancy Support Services; and

(b) describes how the Recipient's will effectively manage the provision of the Tenancy Support Services:

i within its organisation;

ii with the landlord of the SHAP Dwellings (if different to the Recipient);

Tenant means (as the context requires):

(a) a tenant or licensee occupying a SHAP Dwelling; or

(b) a prospective tenant or licensee of a SHAP Dwelling;

Transparency Commitment means the GLA's commitment to publishing its agreements, contracts, tender documents and data from invoices and claims received in accordance with the Local Government Transparency Code 2015 and the GLA's Contracts and Funding Code;

UK GDPR has the meaning given to it in section 3(10) of the Data Protection Act 2018;

Unlawful Subsidy means Subsidy which has been granted, or from time to time is, in contravention of the Subsidy Control Requirements;

Vulnerable Young Person means individuals who will be aged between 18 and 25 (inclusive) when they are granted a tenancy or licence of the relevant SHAP Dwelling by the landlord and who:

(a) in the reasonable opinion of the Recipient are homeless or are Sleeping Rough or have demonstrable history of Sleeping Rough in the immediate past; or

(b) do not fall within limb (a) above but in the reasonable opinion of the Recipient are Insecurely Housed,

and require support services to maintain an independent and settled lifestyle;

1.2 A reference to a person includes firms, partnerships and corporate bodies and their successors and permitted assignees or transferees.

1.3 Headings are for convenience of reference only.

1.4 A party means a party to this Agreement.

1.5 The words includes or including are to be construed without limitation.

1.6 A reference to any statute, enactment, order, regulation or other similar instrument shall be construed as a reference to the statute, enactment, order, regulation or instrument as amended or re-enacted by any subsequent statute, enactment, order, regulation or instrument and shall include all statutory instruments or orders made pursuant to it whether replaced before or after the date of execution of this Agreement.

1.7 Any reference to this Agreement or to any other document shall include (except where expressly stated otherwise) any variation, amendment or supplement to such document to the extent that such variation, amendment or supplement is not prohibited under the terms of this Agreement.

1.8 The Recipient shall in relation to the delivery of its obligations under this Agreement be responsible as against the GLA for the acts or omissions of any Recipient Affiliate as if they were the acts or omissions of the Recipient.

1.9 In any case where the consent or approval of the GLA (or any officer of the GLA) is required or a notice is to be given by the GLA, such consent or approval or notice shall only be validly given if it is in writing (including by email) and signed (or sent, if by email) by (if relevant) the officer stipulated in this Agreement or such other person as may be specified by the GLA by notice in writing to the Recipient

1.10 Neither the giving of any approval, consent, examination, acknowledgement, knowledge of the terms of any agreement or document nor the review of any document or course of action by or on behalf of the GLA shall, unless otherwise expressly stated in this Agreement or agreed in writing by the GLA, relieve the Recipient of any of its obligations under this Agreement or of any duty which it may have hereunder to ensure the correctness, accuracy or suitability of the matter or thing which is the subject of the approval, consent, examination, acknowledgement or knowledge nor confer impose or imply any liability or responsibility on or on behalf of the GLA in respect of or in connection with the matter to or in relation to which such approval consent examination acknowledgement was given or review made.

1.11 Save where a contrary intention is shown, any reference to the GLA acting reasonably shall be interpreted as requiring the GLA to act in a commercially reasonable manner and any

reference to the exercise of discretion by GLA shall be construed as permitting GLA to exercise its discretion freely and without constraint of any kind.

1.12 When there are two (2) or more persons affected by the obligations under this Agreement such obligations are to bind each such person jointly and severally.

1.13 An obligation to do anything includes an obligation to procure its being done.

1.14 Any restriction includes an obligation not to permit infringement of the restriction.

1.15 A document in the agreed form is to be the form of the relevant document agreed between the parties and for the purpose of identification initialled by each of them or on their behalf (in each case with such amendments as may be agreed by or on behalf of the parties) or in the form set out in a Schedule or an Appendix to this Agreement.

1.16 Any terms used in the definition of "Subsidy" shall, unless the context requires otherwise, be construed as having the meaning given to them in the Subsidy Control Requirements.

2 **The Project Objectives**

2.1 In consideration of the sum of £1 (receipt of which the GLA hereby acknowledges), the GLA has agreed to make the GLA Funding available to the Recipient to fulfil the Project Objectives subject to and in accordance with the terms and conditions of this Agreement.

2.2 The Recipient confirms that such details of the SHAP Dwellings comprised in the Original Revenue Project as are required by the GLA have been included in OPS by the date of this Agreement and in submitting such details the Recipient represents and warrants to the GLA that:

2.2.1 it has sufficient resources, including competent and qualified personnel, financial resources, premises and other resources as necessary, to undertake the Project Objectives fully in accordance with this Agreement;

2.2.2 no Financial Event has occurred in respect of the Recipient, nor is there a reasonable prospect of such a Financial Event occurring in the future;

2.2.3 the Revenue Project(s) are consistent with the Approved Bid;

2.2.4 the Revenue Project(s) are deliverable in accordance with the Milestones;

2.2.5 the Revenue Project(s) comprise no Public Sector Funding beyond that identified in the Project Details; and

2.2.6 it has informed and received the support of the local authority(ies) of the areas in which the Revenue Project(s) will be delivered.

2.3 The Recipient must upload such details as the GLA may require in connection with any proposed Additional Revenue Project onto OPS and in submitting such details the Recipient represents and warrants in relation to the proposed Additional Revenue Project in the terms set out in clause 2.2.

2.4 If the GLA is satisfied with the details submitted under clause 2.3 it will confirm its acceptance of the proposed Additional Revenue Project on OPS and from the date of such acceptance:

2.4.1 the proposed Additional Revenue Project shall constitute a Revenue Project and immediately be subject to the terms and conditions of this Agreement;

2.4.2 the details set out by the Recipient in respect of any Additional Revenue Project in OPS and as confirmed by the GLA through OPS shall be deemed to be Project Details for the purposes of this Agreement;

2.4.3 the Recipient will be entitled to claim GLA Funding with respect to any SHAP Dwelling within such Revenue Project pursuant to clause 4.1 and 4.2 and subject to the terms and conditions of this Agreement.

2.5 If the GLA agrees to make available any grant funding in relation to Additional Revenue Project, the GLA Funding will be deemed to be adjusted by amount of grant funding agreed by the GLA in OPS in relation to the new Revenue Project.

2.6 Under no circumstances shall the GLA be obliged to accept any proposed Additional Revenue Project or to provide GLA Funding for any Tenancy Support Services if the GLA (acting reasonably) believes that it does not, will not or is unlikely to have sufficient financial resources available to it (taking account inter alia of its commitments under the SHAP or other programme commitments).

2.7 The Recipient must:

2.7.1 promptly and efficiently deliver the Project Objectives and each Revenue Project fully in accordance with this Agreement;

2.7.2 notify the GLA as soon as reasonably practicable when any circumstance occurs which may:

(a) impact on the Recipient's ability to deliver any Revenue Project and/or the SHAP Dwellings in accordance with the terms of this Agreement; and

(b) indicate that the GLA is making available more grant than is required to deliver any Revenue Project.

2.8 The parties acknowledge and agree that the GLA has no obligation to provide any GLA Funding with respect to any dwelling comprised within a Revenue Project:

2.8.1 which ceases to meet the description of a SHAP Dwelling;

2.8.2 in respect of which there has been (or in the GLA's opinion (acting reasonably)) there will be a Milestone Failure; or

2.8.3 where the relevant Claim for such dwelling relates to Expenditure Incurred after expiry of the Funding Period or, if sooner, 31 March 2028 (unless otherwise expressly agreed by the GLA on OPS in its absolute discretion).

2.9 The parties acknowledge and agree that the Special Conditions apply and have effect.

2.10 In respect of each Revenue Project, the Recipient shall:

2.10.1 deliver the Revenue Project in accordance with agreed Milestones, the Project Details and any applicable requirements of Procurement Law;

2.10.2 notify the GLA on OPS immediately once Milestones have been achieved with respect to each Revenue Project;

2.10.3 notify the GLA in writing immediately upon becoming aware of any event or circumstance which may have a Material Adverse Effect; and

2.10.4 comply with the GLA's requirements in relation to any Project Audit.

3 **Tenancy Support Services**

3.1 The parties acknowledge and agree that:

3.1.1 the Tenancy Support Services Provider shall provide the Tenancy Support Services as set out in OPS and on the basis set out under this Agreement; and

3.1.2 where the GLA (acting reasonably) considers that a change in the Tenancy Support Services Provider or entry into a proposed Alternative Tenancy Support Services Agreement will have a Material Adverse Effect upon the provision of the Tenancy Support Services it shall be entitled to treat this as a failure to deliver the Project Objectives and a Default Event pursuant to clause 7.1.1.

3.2 The Recipient shall:

3.2.1 ensure that the Tenancy Support Services are provided in accordance with the details set out in the Project Details (including staffing levels, intensity of support, support model, types of service offered etc) for the entirety of the Funding Period;

3.2.2 ensure that a Tenancy Support SLA is in place no less than five (5) Business Days prior to the Recipient submitting its first Claim;

3.2.3 comply with (and where relevant ensure that the Tenancy Support Services Provider complies with) the SHAP Support Guidelines;

3.2.4 comply with (and where relevant ensure that the Tenancy Support Services Provider complies with) the terms of any Tenancy Support SLA and the Nomination Agreement;

3.2.5 notify the GLA on OPS at least thirty (30) Business Days in advance of any change in the Tenancy Support Services Provider (and contemporaneously provide the GLA with any proposed form of Alternative Tenancy Support Services Agreement) and where such a change is approved by the GLA it shall be implemented in accordance with clause 11;

3.2.6 ensure that if the Tenancy Support Services Provider changes, the outgoing Tenancy Support Services Provider is required to co-operate with the new Tenancy Support Services Provider and (if a separate entity) the Recipient to ensure the continuous provision of the Tenancy Support Services;

3.2.7 where the Revenue Project is:

(a) an Identified Project, report any serious incidents which occur in respect of any Tenant to the GLA in line with the GLA's Safeguarding and Serious Incidents Policy within the Project Report; and

(b) not an Identified Project:

i manage and review serious incidents in line with the Recipient's internal procedures and policies and ensure that the Tenancy Support Services Provider reports any serious incidents which occur in respect of any Tenant to the Recipient on a similar basis to that set out in the GLA's Safeguarding and Serious Incidents Policy and

ii inform the GLA of any serious incidents which occur in respect of any Tenant in each Quarter during the term of this Agreement, at the end of such Quarter;

3.2.8 provide the GLA promptly with such evidence as the GLA may reasonably require to determine whether any Tenant meets the relevant criteria for the applicable Project Client Group;

3.2.9 ensure that prior to undertaking the Project Objectives it has a Nominations Agreement with each applicable Nominating Body and a Tenancy Support SLA with each Tenancy Support Services Provider;

3.2.10 procure that each Nominations agreement and Tenancy Support SLA:

i complies with any applicable Legislation, including the SHAP Support Guidelines (where applicable) and any other relevant policy or guidance specified by the GLA from time to time;

ii does not and will not conflict with or prejudice the efficacy of the operation of the Nomination Details or the terms of this Agreement;

3.2.11 enforce the terms of each Nominations Agreement and Tenancy Support SLA (as applicable);

3.2.12 promptly resolve any disputes between itself and any Tenancy Support Services Provider and the Recipient acknowledge and agrees that the GLA will not arbitrate or otherwise be involved in any such disputes.

4 **Payment and performance monitoring arrangements**

4.1 Subject to:

4.1.1 the Recipient complying with all the terms of this Agreement and there being no continuing Default Event;

4.1.2 the Recipient having uploaded the Tenancy Support Services Provider's details on OPS (to the GLA's satisfaction);

4.1.3 the Recipient having uploaded in the Project Details (to the GLA's satisfaction) including in respect of any:

(a) applicable OPS ID Numbers;

(b) number of SHAP Dwellings or Indicative SHAP Dwellings identified in the relevant Capital Project or Indicative Project,

as required to be reflected in each Revenue Project;

4.1.4 clause 2.8;

4.1.5 all expenditure proposed to be reimbursed by the amount of GLA Funding set out in the Claim being Expenditure Incurred by the Recipient;

4.1.6 the Revenue Project comprising no Public Sector Funding beyond that identified in the Project Details;

4.1.7 the Recipient having submitted the Project KPI Data for the preceding Quarter;

4.1.8 where the Revenue Project is:

(a) an Identified Project, the Recipient having submitted the Project Report for the preceding Quarter and the preceding Quarter's Project Monitoring Meeting with the GLA having been completed; and

(b) not an Identified Project, the Recipient's having provided the GLA with written confirmation submitted on OPS (or in such other form as the GLA may request) that it has completed monitoring of the Tenancy Support Services (including a meeting with the Tenancy Support Services Provider for the preceding Quarter) and is satisfied that such Tenancy Support Services are being delivered in accordance with the Project Details and the requirements of this Agreement,

the Recipient may submit a Claim to the GLA on OPS for a sum not exceeding the amount of GLA Funding identified in the Funding Profile as payable in that Quarter in accordance with Schedule 1 and this clause 4 and in submitting such Claim the Recipient shall be deemed to represent and warrant to the GLA that:

4.1.9 all confirmations and certifications made or to be made by the Recipient in OPS in relation to the Revenue Project have been, are or will be correct in all material respects; and

4.1.10 the Funding CPs have been satisfied; and

4.1.11 the Revenue Project has been delivered and remains deliverable in accordance with the applicable Milestone Dates.

4.2 The provisions of Schedule 1 shall apply to and govern the Recipient's making of claims for and the GLA's making of payments of GLA Funding.

4.3 The Recipient shall:

4.3.1 make (and ensure that its suppliers and sub-contractors make) all documents in connection with the Revenue Project, the delivery of the Project Objectives and/or the Milestones and the Recipient's obligations under this Agreement available to the GLA upon demand; and

4.3.2 allow (and use all reasonable endeavours to procure that its suppliers and sub-contractors allow) access to such persons for the GLA and/or its agents, contractors or servants at any time for inspection, visits, audit and scrutiny of the involvement of such persons in or about any Revenue Project and their respective contributions to the Recipient's delivery of the Project Objectives and/or the Milestones.

4.4 The Recipient shall ensure that it and any Recipient Affiliate (at its or their cost) co-operates with the GLA during a Subsidy Review and it shall if requested promptly provide the GLA with such information, evidence and/or explanation as the GLA may reasonable require.

5 **Ineligible expenditure**

5.1 Without prejudice to the fact that the Recipient must only use the GLA Funding for the purpose of delivering the Project Objectives, the Recipient must not use monies paid to it by the GLA under this Agreement for:

5.1.1 recoverable input VAT incurred;

5.1.2 any liability arising out of the Recipient's negligence or breach of contract;

5.1.3 payments for unfair dismissal, constructive dismissal or redundancy to staff employed on fixed term contracts signed after June 1996, where this arises in respect of the expiry of that term without it being renewed;

5.1.4 the payment of any ombudsman's award or recommendation as regards compensation for maladministration; and/or

5.1.5 the purchase or acquisition of equipment or other assets or other expenditure for capital purposes.

5.2 The list in clause 5.1 is not exhaustive and other expenditure not listed in clause 5.1 may also be ineligible for GLA Funding under the terms of this Agreement and various incorporated documents. The Recipient must consult the GLA if there is any doubt as to whether particular costs are eligible.

6 **Financial accountability**

6.1 The Recipient must ensure that the requirements set out in this Agreement, and in any clarification or guidance issued from time to time by the GLA, are complied with. In particular the Recipient shall:

6.1.1 agree in writing in advance with the GLA any changes to any of the Project Objectives, Milestones and/or Milestone Dates;

6.1.2 establish, implement and utilise effective monitoring and financial systems, so that as a minimum the costs funded by the GLA Funding can be clearly identified

and the propriety and regularity of all payments and handling of the GLA Funding are ensured;

6.1.3 notify the GLA of the monitoring and financial systems in place, and comply with the GLA's reasonable requirements for these systems;

6.1.4 notify the GLA immediately if any financial irregularity in the use of the GLA Funding is suspected, and indicate the steps being taken in response. Irregularity means any fraud or other impropriety, mismanagement or use of funds for any purposes other than those approved;

6.1.5 notify the GLA immediately if any other financial irregularity is suspected, and indicate the steps being taken in response;

6.1.6 notify the GLA immediately if a Financial Event occurs in respect of the Recipient, or if it has no reasonable prospect of avoiding a Financial Event occurring the future;

6.1.7 keep a record of all Expenditure Incurred together with full supporting evidence including (without limitation) invoices clearly showing Expenditure Incurred on the Project Objectives (or in the absence of such invoices, contract documents and transaction listings from the Recipient's finance management system and certified as true and accurate records of such expenditure by the Recipient's Chief Financial Officer). All evidence of Expenditure Incurred such as invoices, receipts, timesheets and other relevant documents must be kept for at least ten (10) years after the end date of a Revenue Project. The GLA and any person nominated by the GLA has the right to audit any and all such evidence at any time during the ten (10) years after the end date of a Revenue Project on giving reasonable notice (whether in writing or verbally) and at any reasonable time to inspect any aspect of the Recipient's performance of a Revenue Project and the Recipient shall give all reasonable assistance to the GLA or its nominee in conducting such inspection, including making available documents and staff for interview;

6.1.8 make (complying always fully with the requirements of the Data Protection Legislation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and all applicable regulations) all relevant data, information and documents available and provide access at any time for:

(a) inspection, visits and scrutiny of files by the GLA or any other public body undertaking an audit function (whether by itself or its contractors, servants and/or agents); and

(b) an external audit and review of the Revenue Project, Project Objectives and/or Milestones and of financial appraisal and monitoring systems;

and cooperate fully with the GLA and/or anyone acting on their behalf or any other public body undertaking an audit function (whether by itself or its contractors, servants and/or agents) in this regard;

6.1.9 retain and maintain data and systems required (in the reasonable opinion of the GLA) for the verification of the delivery of Project Objectives and/or Milestones, providing the GLA with copies of and access to the same upon request; and

6.1.10 notify the GLA in writing of any change in the identity of the Recipient's Representative.

6.2 The Recipient shall procure (and where relevant shall require any Tenancy Support Services Provider to procure) the maintenance of all appropriate insurance policies in relation to the delivery of the Tenancy Support Services with an insurer of good repute.

7 **Breach of conditions, retention, suspension, withholding and recovery of GLA Funding**

7.1 The GLA may at its absolute discretion reduce, suspend or withhold GLA Funding, or require all or part of the GLA Funding to be repaid and, at its option, terminate this Agreement by giving written notice to the Recipient (with such termination to take effect either immediately or at the end of such notice period as the GLA may stipulate), if:

7.1.1 in the GLA's opinion the Recipient fails to deliver or unsatisfactorily delivers the Project Objectives and/or Milestones;

7.1.2 there is a substantial change to a Revenue Project, the Project Objectives and/or Milestones which the GLA has not approved, or any attempt is made to transfer or assign any rights, interests or obligations created under this Agreement or substitute any person in respect of any such rights, interests or obligations, without the prior consent in writing of the GLA;

7.1.3 any information provided in the application for funding or in a claim for payment or in subsequent or supporting correspondence is found to be incorrect or incomplete to an extent which the GLA reasonably considers to be material;

7.1.4 the Recipient fails to comply with any of the terms and conditions set out in this Agreement and such failure has a Material Adverse Effect;

7.1.5 the composition, ownership or control of the Recipient changes, or a Financial Event occurs in respect of the Recipient or it is dissolved in any way;

7.1.6 any other circumstances significantly affect the Recipient's ability to deliver a Revenue Project and/or meet the Project Objectives and/or Milestones or result in or are in the reasonable opinion of the GLA likely to lead to a Revenue Project and/or the meeting of the Project Objectives and/or Milestones as approved not being completed;

7.1.7 insufficient measures are taken by the Recipient to investigate and resolve any financial irregularity or the GLA reasonably concludes the GLA Funding is at risk of being misapplied;

7.1.8 termination of the Tenancy Support Service Agreement or material amendment to a Tenancy Support Specification during the Funding Period, save where it is replaced by an Alternative Tenancy Support Service Agreement;

7.1.9 the Recipient fails to provide the GLA upon request with:

(a) copy invoices clearly showing Expenditure Incurred on the Project Objectives and/or Milestones or in the absence of such invoices, contracts, documents and transaction listings from the Recipient's finance management system and certified as true and accurate records of such expenditure by the Recipient's Chief Financial Officer; or

(b) documentary evidence verifying (in the opinion of the GLA) the delivery of the Project Objectives and/or Milestones;

7.1.10 the acts or omissions of the Recipient, its contractors, agents, servants of any persons receiving grant funding from the Recipient might (in the opinion of the GLA) conflict with the objectives of the GLA, bring the GLA, the SHAP, DLUHC or the Mayor of London into disrepute or adversely affect the reputation of the GLA, the SHAP, DLUHC or the Mayor of London;

7.1.11 the Recipient's status as a Registered Provider is lost, relinquished or removed (where applicable);

7.1.12 the Recipient's Investment Partner status is withdrawn, removed or restricted such that it does not extend to a Revenue Project or GLA becomes aware that such status is likely to be withdrawn, removed or restricted;

7.1.13 the Regulator directs or recommends that grant is not to be paid to the Recipient or the GLA understands that such a direction or recommendation is likely to be made;

7.1.14 the Recipient is unable to make the representations and give the warranties or is in breach of any representation or warranty set out in this Agreement;

7.1.15 the Recipient or a Tenancy Support Services Provider ceases operating;

7.1.16 a Project Audit or Funding Review demonstrates that the GLA Funding was either:

(a) in excess of what was required to deliver the Project Objectives; and/or

(b) was not spent on the Project Objectives (in whole or in part);

7.1.17 the Recipient fails to comply with (or fails to procure that the Tenancy Support Services Provider complies with) the SHAP Support Guidelines; and

7.1.18 the Tenancy Support Services cease in respect of a Revenue Project before the expiry of the Funding Period.

7.2 The Recipient shall notify the GLA immediately and provide the GLA with a full written explanation, if any of the circumstances in clause 7.1 arise.

7.3 If the GLA becomes entitled to exercise its rights under clause 7.1, it may nevertheless decide not to exercise those rights, or not to exercise them to the fullest extent possible, or to delay in exercising those rights. Any decision not to exercise the GLA's rights under clause 7.1, or to exercise them only partially or to delay in exercising them, may be made

on conditions which will be notified to the Recipient provided always that any such decision by the GLA shall not prevent the subsequent enforcement of any subsequent breach of that provision, and shall not be deemed to be a waiver of any subsequent breach of that or any other provisions.

7.4 In the event that the GLA exercises its right to terminate this Agreement under clause 7.1:

7.4.1 the relationship of the parties shall cease and any rights granted under or pursuant to this Agreement shall cease to have effect save as (and to the extent) expressly provided for in this clause 7.4;

7.4.2 any provision which expressly or by implication is intended to come into or remain in force on or after termination shall continue in full force and effect;

7.4.3 the Recipient shall promptly return to the GLA or dispose of in accordance with the GLA's instructions all information, other data and documents and copies thereof disclosed or supplied to the Recipient by the GLA pursuant to or in relation to this Agreement; and

7.4.4 the Recipient shall repay to the GLA such amounts of the GLA Funding paid to the Recipient prior to termination as it deems appropriate (acting reasonably provided that where the GLA (acting reasonably) considers that the Recipient has acted fraudulently or dishonestly in claiming any GLA Funding or the acts or omissions of the Recipient have materially adversely affected the reputation of the GLA, it shall be reasonable for the GLA to have absolute discretion in determining the amount repayable under this clause 7.4.4).

7.5 The GLA may also in addition to but without prejudice to its rights under clauses 7.1 to 7.3 (inclusive) and at its sole discretion terminate this Agreement at any time by giving three (3) months' notice in writing to the Recipient.

7.6 In the event that the GLA exercises its right to terminate this Agreement pursuant to clause 7.5:

7.6.1 the provisions of clauses 7.4.1 to 7.4.3 of this Agreement shall apply; and

7.6.2 the GLA shall pay the Recipient a pro-rated sum calculated by reference to Expenditure Incurred on or before the date on which notice is served under clause 7.4 and for which it has yet to claim under this Agreement provided always that the Recipient submits a Claim for the same with all supporting documentation required by the GLA in accordance with clause 4 of this Agreement and Schedule 1.

8 Procurement and Subsidy Control

8.1 All procurement of works, equipment, goods and services shall be based on value for money and suitable skills and experience and conducted:

8.1.1 using a fair and transparent documented decision making process taking account of public sector accountability and probity;

8.1.2 in accordance with all relevant law and policies including the Public Contracts Regulations 2015 and GLA Contracts and Funding Code. For the avoidance of doubt:

(a) three or more written quotations must be sought in respect of purchases with values between £10,000 and £150,000 (inclusive); and

(b) an advertised competitive tender exercise (in accordance with the Public Contracts Regulations 2015 where the thresholds therein are met/exceeded) must be conducted in respect of purchases with values exceeding £150,000; and

8.1.3 in accordance with government best practice relating to procurement practices and procedures.

8.2 This Agreement is drafted with the intention that it is lawful and complies with the Subsidy Control Requirements (and that where the Recipient is a local authority, any Agreement Funding received by that Recipient does not give rise to a Subsidy).

8.3 If the Agreement Funding constitutes Unlawful Subsidy (including (without limitation) where the Recipient is not a local authority and an SPEI Overpayment arises) then the GLA shall be entitled to recover from the Recipient the amount of such SPEI Overpayment and/or Unlawful Subsidy together with such interest as it is required by law to recover and the Recipient must pay such amount(s) within ten (10) Business Days of the GLA requesting repayment.

8.4 The Recipient:

8.4.1 shall promptly give written notice to the GLA of any Public Sector Funding it receives from a third party in relation to a Revenue Project; and

8.4.2 may not advance or on-lend any Agreement Funding to a third party (in whole or in part).

8.5 Save where the Recipient is a local authority, the Recipient acknowledges and accepts the SPEI Assignment.

8.6 If following the date of this Agreement, the law requires the GLA to amend this Agreement to comply with a Subsidy Control Requirement then the GLA may, acting reasonably, provide written notice to the Recipient to vary this Agreement to the extent necessary to comply with such change in law.

8.7 The GLA may monitor the Recipient's compliance with the requirements of this clause 8 (where applicable) and for the avoidance of doubt any failure to comply with such requirements (where applicable) shall be deemed a breach of a material term or condition of this Agreement which has a Material Adverse Effect for the purposes of clause 7.1.4.

8.8 The Recipient shall promptly give written notice to the GLA if it becomes aware of an allegation or a finding that Unlawful Subsidy has arisen in relation to this Agreement (including the delivery of the Recipient's obligations under it), the Agreement Funding, whether the same allegation or finding relates to the Recipient or otherwise.

9 **Publicity and intellectual property**

9.1 The Recipient shall ensure that, where appropriate, publicity is given to a Revenue Project and the fact that the GLA is financially supporting the relevant Revenue Project. In acknowledging the contribution made by the GLA, the Recipient must comply with any guidance on publicity provided by the GLA and the GLA's logos (in the form set out in Schedule 2) shall be used wherever possible.

9.2 All publicity generated by the Recipient referring to the Mayor of London and/or the GLA including (without limitation) all press and media releases must be approved in writing at least two (2) weeks in advance of any release of publicity material (in any form) by the GLA's Representative. The Recipient shall also ensure that any proposals for any launch or other related publicity activity are approved in writing by the GLA at least one (1) month before the date of such proposed launch or other related publicity activity.

9.3 The Recipient shall ensure that it does not by its own actions or omissions, or those of its contractors or agents, harm the GLA's reputation or bring the GLA into disrepute.

9.4 If any part of the GLA Funding is used directly or indirectly to purchase or develop any Intellectual Property Rights then the Recipient shall take all necessary steps to protect such rights and hereby grants a perpetual, royalty-free licence to the GLA to use the same for the purposes related to, and connected with, policies, initiatives and campaigns, and related to, or connected with, the GLA's discharge of its statutory duties and powers.

10 **Agency**

10.1 The Recipient is not and shall in no circumstances hold itself out as being the agent or partner of the GLA.

10.2 The Recipient is not and shall in no circumstances hold itself out as being authorised to enter into any contract on behalf of the GLA, or in any other way to bind the GLA, to the performance, variation, release or discharge of any obligation or power or to make any statement on behalf of the GLA (unless approved in writing in advance).

10.3 The employees of the Recipient are not, shall not hold themselves out to be, and shall not be held out by the Recipient as being, employees of the GLA for any purpose whatsoever.

11 **Amendment**

11.1 The parties may from time to time agree changes to the Project Details and where such changes are agreed they shall be implemented by the Recipient amending the Project Details in OPS and the electronic confirmation of that amendment by the GLA through OPS and in default of agreement the parties will be bound by the Project Details as they existed prior to the changes proposed under this clause 11.

11.2 The Recipient acknowledges and agrees that it will be required to identify and keep updated on OPS, certain Milestones which must be achieved by specified Milestone Dates in relation to each Revenue Project.

11.3 If the Recipient proposes any changes to the Milestones, Milestone Dates and/or Claim Dates, it must upload such proposed changes on OPS for the GLA’s review. If the GLA agrees to the changes, it will confirm the amendments on OPS. In default of agreement the

parties will be bound by the Milestones, Milestone Dates and/or Claim Dates as they existed prior to the changes proposed.

11.4 The GLA shall not under any circumstances be obliged to extend any Milestones, Milestone Dates and/or Claim Dates (although it may do so in its absolute discretion) if this would:

11.4.1 change the amount of GLA Funding proposed to be claimed in any financial year in the relevant Funding Period; and/or

11.4.2 extend any Milestone Dates and/or Claim Dates beyond 31 March 2028.

11.5 The Recipient acknowledges and agrees that any amendment requested under this Agreement which would impact upon the amount of the GLA Funding or the Funding Profile shall be agreed in the GLA's absolute discretion and may require the GLA to obtain DLUHC's prior consent.

11.6 The parties acknowledge and agree that the GLA may from time to time review (a **Funding Review**) the amount of GLA Funding claimed or forecast to be claimed against:

11.6.1 the Recipient's progress against the Milestones and the Milestone Dates; and/or

11.6.2 the number of Caseload Spaces (Actual) relative to the number of Caseload Spaces (Claimed),

11.6.3 the number of Caseload Spaces (Actual) relative to the number of Caseload Spaces set out in the Project Details

and the Recipient must promptly assist and co-operate with such Funding Review, including by way of providing any additional information or evidence requested by the GLA.

11.7 Without prejudice to the operation of clause 7, where the GLA identifies further to a Funding Review that:

11.7.1 there has been a Milestone Failure; or

11.7.2 the number of Caseload Spaces (Actual) is less than the number of Caseload Spaces (Claimed); or

11.7.3 the number of Caseload Spaces (Actual) is or will be less than the number of Caseload Spaces anticipated to be delivered in the Project Details at the relevant Milestone Date,

the GLA shall notify the Recipient and the parties (acting in good faith) shall seek to agree within fifteen (15) Business Days of the date of such notification a revised Funding Profile and/or GLA Funding figure in light of the Funding Review Trigger and:

11.7.4 where the revised Funding Profile or GLA Funding figure is agreed (the **Agreed Funding Adjustment**) the Recipient will:

(a) amend the Project Details including the amount of the GLA Funding and Funding Profile to reflect the Agreed Funding Adjustment as may be necessary on OPS; and

(b) reduce the GLA Funding and/or Funding Profile to reflect the Agreed Funding Adjustment; or

(c) where requested by the GLA, repay the difference between the GLA Funding figure recorded on OPS in respect of the relevant Revenue Project immediately prior to the Funding Review and the Agreed Funding Adjustment within ten (10) Business Days of the GLA's demand.

11.7.5 where a revised Funding Profile or GLA Funding figure is not agreed the GLA will be entitled to:

(a) reduce the GLA Funding and/or adjust the Funding Profile by an amount equal to the Reduction Amount and require the Recipient to amend the Project Details (including the amount of the GLA Funding and Funding Profile) to reflect such reduction or adjustment on OPS; or

(b) where the circumstances in clause 11.7.2 apply, require the Recipient to repay to the GLA the Pro-Rated Amount within 10 Business Days of the GLA's demand.

11.8 Without prejudice to the operation of clauses 11.1 to 11.7 (inclusive) the Recipient understands that amendments to this Agreement may be necessary in accordance with instructions and guidance issued by the GLA. No amendment to this Agreement shall be effective unless it is made in writing and by deed and the Recipient shall comply with any formal procedures for amending agreements which the GLA may have in place from time to time, and shall not unreasonably withhold or delay its consent to any amendment reasonably proposed by the GLA.

12 **Review, monitoring and reporting**

12.1 The Recipient must keep OPS updated and ensure that it accurately reflects any requirements of the GLA and the agreed Project Details from time-to-time.

12.2 The Recipient will be required to monitor progress against the agreed Milestones and Milestone Dates in each Revenue Project and promptly update OPS with any proposed changes to the Milestones and Milestone Dates and inform the GLA of any impacts on forecasted claims profiled on OPS. The GLA shall not be obliged to approve any changes to the Milestones, Milestone Dates or Funding Profile.

12.3 The Recipient must promptly advise the GLA when any circumstance occurs which:

12.3.1 may impact adversely on the Recipient’s ability to deliver any Revenue Project in accordance with the Milestone Dates or otherwise in accordance with the terms of this Agreement; or

12.3.2 constitutes a Default Event or a breach of the Delivery and Operational Obligations.

12.4 The Recipient will be required to provide the GLA with a list of CHAIN (Combined Homelessness and Information Network) numbers of Tenants on an annual basis or as otherwise required by the GLA, to allow for monitoring of demographic and equalities information for the Single Homelessness Accommodation Programme.

12.5 The Recipient will be required to provide the GLA with:

12.5.1 where requested by the GLA aggregate, anonymised data for equalities impact monitoring purposes;

12.5.2 Project KPI Data and, where a Revenue Project is an Identified Project, the Project Report, via OPS (or such other method specified by the GLA from time to time) in advance of the submission of each Claim.

12.6 Where a Revenue Project:

12.6.1 is an Identified Project, the Recipient will be required to attend a Project Monitoring Meeting with the GLA in respect of such project each Quarter;

12.6.2 is not an Identified Project, the Recipient must:

(a) carry out its own meetings with the Tenancy Support Services Provider to ensure it is satisfied that the Tenancy Support Services are being delivered in line with the Project Details each Quarter and provide confirmation to the GLA that such meetings have occurred within the same Quarter; and

(b) report the outcomes of any meetings to the GLA when reasonably requested to do so by the GLA.

12.7 Without prejudice to the requirements of clause 12.6, the Recipient shall attend a review meeting when required to do so by the GLA acting reasonably and the GLA shall provide the Recipient with written details of the matters to be discussed at the review meeting timeously in advance of such meeting.

12.8 The Recipient shall provide the GLA as soon as reasonably practicable with such information as the GLA shall reasonably require to support or facilitate the discussions referred to in this clause 12 and shall use all reasonable endeavours to ensure the accuracy of any information provided.

12.9 In addition to any meetings, throughout the term of this Agreement the Recipient shall:

12.9.1 cooperate fully with and provide the GLA and its agents, servants and contractors with all information and assistance that it reasonably requests from time to time including (without limitation) participating in and supporting any evaluation by the GLA or DLUHC of any Revenue Project; and

12.9.2 procure that the Tenancy Services Support Provider and Recipient's agents, servants and contractors cooperate fully with and provide the GLA and DLUHC and its or their agents, servants and contractors with all information and assistance that it or they reasonably requests from time to time including (without limitation) participating in and supporting the GLA or DLUHC’s evaluation of any Revenue Project.

13 **Compliance with legislation and policies**

13.1 The Recipient shall ensure that it, and anyone acting on its behalf, complies with the law for the time being in force in England and Wales, and in particular:

13.1.1 shall take all necessary steps to secure the health, safety and welfare of all persons involved in or attending a Revenue Project or delivering the Project Objectives;

13.1.2 shall ensure it complies and its suppliers and sub-contractors comply with the provisions of Bribery Act 2010 and any guidance issued by the Secretary of State under it (whether or not so obliged expressly by that act or such guidance); and

13.1.3 shall have in place appropriate equal opportunities and complaints policy/procedures and shall not unlawfully discriminate against any person.

13.2 The Recipient warrants that it has or will obtain the necessary authority (legislative or otherwise) to deliver the relevant Revenue Project and the Project Objectives.

13.3 Without prejudice and in addition to clause 13.1 and clause 13.2 the Recipient:

13.3.1 shall comply with all relevant enactments in force from time to time relating to discrimination in employment and the promotion of equal opportunities;

13.3.2 acknowledges that the GLA is under a duty under section 149 of the Equality Act 2010 to demonstrate it has paid due regard to the need to:

(a) eliminate unlawful discrimination and harassment;

(b) advance equality of opportunity between groups who share protected characteristics and those that do not, in particular, minimise disadvantage suffered by the equality groups; taking steps to meet the needs of equality groups that are different from the needs of others; encouraging equality groups to participate in public life or in any other activity (such as elected office or management positions) in which their participation is disproportionately low; and

(c) foster good relations between people who share a protected characteristic and those that do not (protected characteristics having the meaning ascribed to them by the Equality Act 2010 and including (without limitation): age, race, gender, disability, religion or belief, sexual orientation, marital or civil partnership status, gender reassignment),

and shall, in undertaking any activity concerning a Revenue Project assist and cooperate with the GLA where possible in respect of the GLA's compliance with its duties under clause 13.3.2;

13.3.3 shall assist and co-operate with the GLA where possible with the GLA's compliance with its duties under section 149 of the Equality Act 2010 including any amendment or re-enactment thereof and/or any guidance, enactment, order, regulation or instrument made pursuant to the same;

13.3.4 shall before the commencement of the delivery of the Project Objectives in any Revenue Project:

(a) undertake Disclosure and Barring Service checks in respect of all persons engaged in or about the relevant Revenue Project (by the Recipient, the Tenancy Services Support Provider, any agent, sub-recipient of GLA Funding, contractor or sub-contractor) where such persons shall be working with children or vulnerable persons or have access to personal data (as defined by the Data Protection Legislation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as applicable) concerning such children and vulnerable persons in relation as part of the relevant Revenue Project; and

(b) have in place (and maintain throughout the continuance of the relevant Revenue Project) appropriate child and vulnerable persons safeguarding policies, which must, for the avoidance of doubt meet any requirements of the GLA's related policies in this place from time to time, including (without limitation) the GLA's Child Policy and Protection Procedures.

13.3.5 shall if required by the GLA, ensure that the relevant Revenue Project shall incorporate and be carried out in accordance with the Responsible Procurement Policy. In which case, if requested by the GLA, the Recipient shall develop a responsible procurement plan (the **Recipient's Responsible Procurement Plan**) setting out how the Recipient intends to carry out the relevant Revenue Project in accordance with the Responsible Procurement Policy, and the Recipient shall submit the Recipient's Responsible Procurement Plan to the GLA for approval, such approval not to be unreasonably withheld. The GLA shall monitor the Recipient's compliance with this clause and the Recipient's Responsible Procurement Plan, and any failure to comply with such requirements shall constitute a breach of this Agreement which has a Material Adverse Effect;

13.3.6 shall, where relevant to a Revenue Project, be fully responsible for complying with all obligations on the part of the "client" contained in the Construction (Design and Management) Regulations 2015 and the Recipient shall indemnify the GLA in respect of all liabilities which the GLA may incur or suffer in relation to such Regulations; and

13.3.7 shall ensure that its employees, contractors, servants, agents and/or sub-contractors undertake the relevant Revenue Project and comply with its obligations under this Agreement in manner which enables the GLA to comply fully with its duties under part 5 Counter-Terrorism and Security Act 2015 and which sets out a duty for specified authorities (and their grant recipients) to have due regard to the need to prevent people from being drawn into terrorism.

13.4 The Recipient may be required to upload copies of certain policies (such as policies in respect of safeguarding, whistleblowing, referral, lone working) to OPS and must comply with any policies so uploaded.

14 **Liability and insurance**

14.1 The Recipient shall be liable for and shall indemnify and keep indemnified the GLA from and against any loss or damage incurred and any injury (including death) suffered and all actions, claims, costs, demands, proceedings, damages, charges and expenses whatsoever brought against the GLA and arising in connection with the management (including financial management) and delivery of any Revenue Project to the extent that such loss, damage, injury (including death), actions, claims, costs, demands, proceedings, damages, charges and expenses are due to the negligence of the Recipient or the default of the Recipient in carrying out its obligations under this Agreement.

14.2 The Recipient shall ensure that at all material times it maintains in force appropriate policies of insurance with an insurance company of long-standing and good repute in respect of:

14.2.1 public liability for a minimum amount of five million pounds sterling (£5,000,000) in respect of any one occurrence or a series of occurrences arising out of any one event; and

14.2.2 such other insurance as may be required in order to fulfil the conditions of this Agreement including (without limitation) employers liability insurance for the statutory minimum amount of cover.

14.3 The Recipient shall on the written request of the GLA from time to time allow the GLA to inspect and/or provide the GLA with evidence that it has all necessary policies of insurance in place.

15 **Data Protection, Freedom of Information, confidentiality and transparency**

15.1 The Recipient shall ensure that at all times it complies with its obligations under this Agreement in such manner so as to comply with the Data Protection Legislation, including (without limitation) the maintenance of an appropriate registration with the Information Commissioner.

15.2 The Freedom of Information Act 2000 (the **FOIA**) gives a general right of access to information held by a public authority. Subject to any exemptions applicable, the Recipient shall co-operate fully with the GLA as reasonably requested by the GLA in respect of any request for information made to the GLA in connection with this Agreement pursuant to the FOIA.

15.3 Subject to clauses 15.2, 15.4 and/or 15.5 the parties shall keep confidential any information exchanged between the parties which either party has specified as confidential or which would be likely to prejudice the interests of either party commercially or otherwise.

15.4 The obligations under clause 15.3 shall not apply to:

15.4.1 information which at the time of disclosure is in the public domain;

15.4.2 information which is required to be disclosed by law;

15.4.3 information which is disclosed with the consent of the disclosing party.

15.5 The Recipient acknowledges and agrees that the GLA:

15.5.1 is subject to the Transparency Commitment and accordingly, notwithstanding clause 15.3, the Recipient hereby gives its consent for the GLA to publish the Agreement Information to the general public; and

15.5.2 the GLA may in its absolute discretion redact all or part of the Agreement Information prior to its publication. In so doing and in its absolute discretion the GLA may take account of the exemptions/exceptions that would be available in relation to information requested under FOIA. The GLA may in its absolute discretion consult with the Recipient regarding any redactions to the Agreement Information to be published pursuant to this clause 15.5. The GLA shall make the final decision regarding publication and/or redaction of the Agreement Information.

16 **Entire agreement**

This document sets out the entire agreement between the parties and supersedes all prior oral or written agreements, arrangements or understandings between them. The parties acknowledge that they are not relying on any representation, agreement, term or condition, which is not set out in this Agreement.

17 **Force majeure**

17.1 Either party shall notify the other in writing of any Force Majeure Event as soon as it is aware of it.

17.2 Neither party shall be in breach of the Agreement by reason of any Force Majeure Event. Each party shall bear their own costs arising as a consequence of the Force Majeure Event.

18 **Dispute resolution**

18.1 All disputes and differences arising out of or in connection with this Agreement (a **Dispute**) shall be resolved pursuant to the terms of this clause 18.

18.1.1 In the event that the Recipient or the GLA consider that a Dispute exists, such party shall serve a notice upon the other party (a **Notice of Dispute**) giving brief details of the Dispute and in the first instance the parties shall use their reasonable endeavours to resolve such Dispute amicably and in good faith and in accordance with this clause 18.

18.1.2 Representatives of the parties shall meet within five (5) Business Days (or such other longer period not exceeding twenty (20) Business Days as the parties may agree) of receipt of a Notice of Dispute.

18.1.3 Where either no representatives of both parties are available to meet within the period set out in clause 18.1.2 or the representatives fail to agree a unanimous resolution of the Dispute at such meeting, the Dispute shall be referred to the chief executives (or nominated deputies) of the Recipient and the GLA (the **Senior Executives**).

18.1.4 The Senior Executives shall meet within ten (10) Business Days (or such other longer period not exceeding twenty (20) Business Days as the parties may agree) of such referral to attempt to resolve the Dispute. Any unanimous resolution of the Senior Executives shall be recorded in writing and signed by them and shall be final and binding unless the parties agree otherwise.

18.1.5 if the Dispute remains unresolved after ten (10) Business Days following referral to the Senior Executives, such Dispute must be dealt with in accordance with clause 18.2.

18.2 In the circumstances contemplated in clause 18.1.5, the parties will attempt to settle the Dispute by mediation in accordance with the CEDR Model Mediation Procedure. Unless otherwise agreed by the parties, the mediator will be nominated by CEDR. The parties agree that:

18.2.1 to initiate the mediation a party must give notice in writing (**ADR Notice**) to the other party to the Dispute requesting a mediation. A copy of the request should be sent to CEDR;

18.2.2 the mediation shall start not later than twenty eight (28) days after the date of the ADR Notice; and

18.2.3 except where the right to issue proceedings would be prejudiced by a delay, no party may commence any court proceedings in relation to any dispute arising out of this Agreement until it has attempted to settle the dispute by mediation and either the mediation has terminated or the other party has failed to participate in the mediation.

19 **Notices**

19.1 Any notice to be given hereunder shall be in writing and shall be sufficiently served if:

19.1.1 sent by electronic mail (but not by facsimile) in the case of either party to the other party's email address set out in clause 19.3 provided that the party includes in the subject line of the email words sufficient to identify the contents of the email as a notice given under this Agreement; or

19.1.2 delivered by hand and receipted for by the recipient; or

19.1.3 sent by a recorded delivery service addressed in the case of either party to the other party's registered office as set out at the beginning of this Agreement or to such other addresses as either party may from time to time notify to the other in writing provided that such other address is within England and Wales.

19.2 Any notice shall be deemed to be given by the sender and received by the Recipient:

19.2.1 if sent by email, on the date that the email is received at the relevant email address set out in clause 19.3;

19.2.2 if delivered by hand, when delivered to the recipient;

19.2.3 if delivered by a recorded delivery service, three (3) Business Days after delivery including the date of postage;

provided that if the delivery or receipt is on a day which is not a Business Day or is after 4 pm it is to be regarded as received at 9 am on the following Business Day.

19.3 The email addresses for service of notices given pursuant to clause 19.2 are:

19.3.1 for the GLA:

(a) email address: roughsleepingcommissioning@london.gov.uk;

19.3.2 for the Recipient:

(a) email address: [ ],

or to such other email addresses as either party may from time to time notify to the other in writing to the other party's email addresses set out in this clause 19.3.

20 **Survival of this Agreement**

20.1 Insofar as any of the rights and powers of the GLA provided for in this Agreement shall or may be exercised or exercisable after the termination or expiry of this Agreement the provisions of this Agreement conferring such rights and powers shall survive and remain in full force and effect notwithstanding such termination or expiry.

20.2 Insofar as any of the obligations of the Recipient provided for in this Agreement remain to be discharged after the termination or expiry of this Agreement the provisions of this Agreement shall survive and remain in full force and effect notwithstanding such termination or expiry.

20.3 Without limitation the provisions of any of clauses 2.10.4, 4.3, 4.4, 6, 7, 8, 9, 10, 14, 15, 18, 19, 21, paragraphs 3, 4 and 6 of Schedule 1, Schedule 5, Schedule 8 and this clause 20 and such other provisions of this Agreement as are necessary to give effect to such clauses are expressly agreed by the parties to survive the termination or expiry of this Agreement.

21 **Governing law**

This Agreement shall be governed by and construed in accordance with the laws of England and Wales and subject to the provisions of clause 18 the parties irrevocably submit to the exclusive jurisdiction of the courts of England and Wales.

22 **London Living Wage**

Without prejudice to any other provision of this Agreement, the Recipient shall (and will ensure that their consultants, contractors and sub-contractors shall):

22.1 use all reasonable endeavours to ensure that no employees engaged in the delivery of the Project Objectives is paid an hourly wage (or equivalent of an hourly wage) less than the London Living Wage;

22.2 use all reasonable endeavours to ensure that no employees engaged in the delivery of the Project Objectives is paid less than the amount to which they are entitled in their respective contracts of employment; and

22.3 provide to the GLA such information concerning the London Living Wage as the GLA or its nominees may reasonably require from time to time.

23 **Execution**

23.1 This Agreement may be executed:

23.1.1 by the electronic application of a party's authorised signatory's signature and provision of an electronic copy of the same; and

23.1.2 in any number of counterparts and each counterpart will when executed be an original of this Agreement and all counterparts together will constitute one instrument.

24 **Exclusion of third party rights**

Except as otherwise expressly provided no person who is not a party to this Agreement shall be entitled to enforce any terms of this Agreement solely by virtue of the Contracts (Rights of Third Parties) Act 1999.

25 **Substitute SHAP Dwellings**

25.1 If the GLA agrees that a SHAP Dwelling (the **Original Dwelling**) is substituted for an alternative SHAP Dwelling (the **Substitute SHAP Dwelling**) under a Capital Project, the Recipient must:

25.1.1 update the Project Details to reflect the inclusion of the Substitute SHAP Dwelling by:

(a) if applicable, amending the OPS ID Number referrable to the Original Dwelling to reflect the OPS ID Number for the Substitute SHAP Dwelling;

(b) make such other amendments to the Project Details as the GLA may require;

25.1.2 continue to provide the Tenancy Support Services in respect of the Substitute SHAP Dwelling on the basis set out in this Agreement.

This Agreement has been executed as a deed and is delivered and takes effect on the date stated at the beginning of it.

[GLA]

[**EXECUTED** as a **DEED** by affixing)
the common seal of the)
GREATER LONDON AUTHORITY)
In the presence of:

Authorised Signatory]

[DN: Include if using wet ink signatures]

[**EXECUTED** and delivered)
for and on behalf of the)
GREATER LONDON AUTHORITY by:)

Authorised Signatory

……

NAME (BLOCK)

……

Position

……

Authorised Signatory

……

NAME (BLOCK)

……

Position]

[DN: include if using electronic signatures]

[Recipient]

EXECUTED as a **DEED** by affixing **THE COMMON SEAL** of **[RECIPIENT]**)
In the presence of:)

……
Authorised Officer

Print Name:

Schedule 1

Funding Schedule

1 **Payment Arrangements**

1.1 Within thirty (30) Business Days of each Claim Date (or such other date expressly agreed by the GLA on OPS), the Recipient shall submit to the GLA via OPS:

1.1.1 a Claim;

1.1.2 where requested by the GLA, details of the Expenditure Incurred (with supporting evidence) including copies of third party invoices, and/or contract documents and transaction listings from the Recipient's finance management system and certified as true and accurate records of such expenditure by its Chief Financial Officer (which shall mean such officer validly authorised to act in such capacity on the Recipient's behalf (**Recipient's Chief Financial Officer**));

1.1.3 up to date and complete Project KPI Data and (where applicable) any relevant Project Report; and

1.1.4 such other evidence and information, as the GLA may require (acting reasonably).

2 The GLA shall, subject always to clause 4.1, pay the Grant Payment to the Recipient within ten (10) Business Days of submission of a valid Claim on OPS by the Recipient, provided that that the accompanying information and evidence submitted pursuant to the above paragraph 1 is in a form satisfactory to the GLA.

3 If the record referred to in clause 6.1.7 of this Agreement shows that the GLA Funding paid to the Recipient is in excess of the Expenditure Incurred by the Recipient for the achievement of the Project Objectives, then the Recipient shall repay that excess amount to the GLA forthwith and in all circumstances no later than thirty (30) days following demand by the GLA. Without prejudice to this obligation, the GLA may recover this excess by reduction of any funding still to be paid under this Agreement, or by set off against any other money due or to be due from the GLA to the Recipient.

4 If the whole or any part of the GLA Funding is not claimed by the Recipient within three (3) months of the expiry of the Funding Period it will (unless the GLA has otherwise agreed in writing) automatically be cancelled and the GLA shall not be required or obliged to pay any further GLA Funding.

5 The parties acknowledge and agree that the:

5.1.1 amount of GLA Funding identified in any Claim may not exceed the amount identified in the Funding Profile as payable in the relevant Quarter; and

5.1.2 total Grant Payments claimed by the Recipient under this Agreement may not exceed the GLA Funding.

6 The Recipient must submit such information as the GLA reasonably requires to monitor the operation and application of this Schedule 1 and to support the claims made by the Recipient under it.

Schedule 2

The GLA's Logo



Schedule 3

Milestones, Monitoring and Key Performance Indicators

Milestones

OPS Block: Milestones & Claims Block

- All Revenue Recipients will be required to input dates for the pre-fixed milestones at bidding stage.
- Further bespoke milestones may be appropriate and will be discussed and agreed post-allocation.

	Milestone	**Date**
Pre-fixed milestones (at bidding stage)	Start of implementation period	
	All staff recruited	
	Full service start	
	First unit occupied	
	Service at full occupancy	
	End of support service	

Milestone definitions

- Start of implementation period means the date from which expenditure incurred can be claimed against allocated SHAP revenue
- All staff recruited means all staff on the agreed staffing structure for the service have been recruited for and/or cover arrangements have been made for any vacancies
- First unit occupied means a tenancy/licence has been issued for occupancy of the first unit
- Full service start means the staff team is in post, service is open to referrals and units are available for occupation
- Service at full occupancy means the service is at 100% occupancy for all lettable units or target steady state of occupancy (if not expected to be 100% occupancy at all times)
- End of support service means the support service as funded by SHAP revenue has ended (NB the service may continue under non-SHPA funded and/or in an altered form once SHAP funding has ended)

Monitoring

SHAP projects are considered either 'Identified Projects' or 'Non-Identified Projects'.

Identified Projects will typically be those where the Revenue Recipient is also the support provider, although the GLA may consider other projects to Identified Projects if they are novel or complex.

Non-Identified Projects are all other projects, typically those where the Revenue Recipient and the support provider are separate organisations.

Your allocation letter will make clear whether your project is Identified or Non-Identified, and this will also be reflected in the updated bid information entered onto OPS post-allocation.

Monitoring requirements will be different for Identified Projects and Non-Identified Projects.

All projects will:

- Submit monthly KPI data via the KPI block on OPS

Identified Projects will:

- Submit a quarterly monitoring report via OPS (see example template below)
- Attend a quarterly monitoring meeting with GLA officers

Non-Identified Projects will:

- Submit quarterly confirmation (as part of the quarterly claim) via OPS that they have completed their own appropriate monitoring and oversight of the support provision
- By exception and upon GLA request produce evidence of the above

In all cases, it is the Revenue Recipient that is responsible for submitting monitoring data and reports.

Monthly Key Performance Indicators

OPS block: KPI block

All Revenue Recipients will be required to submit data for the following Key Performance Indicators (**KPIs**) on a monthly basis. Submission will be required by the end of the month following the month being reported on (e.g. if reporting on April performance, submissions can be made from 1 May and must be received before 31 May).

Clients supported	1. Number of service users supported to-date (all time)
	2. Of 1, number of service users with a CHAIN record
	3. Number of service users supported within the month
	4. Of 3, number of service users who slept rough in the month (excluding rough sleeping before accessing the service)
	5. Number of service users supported at month end
	6. Number of service users housed to-date (all time)

Clients housed	7. Number of service users housed within the month
	8. Number of service users newly housed within the month
	9. Number of service users housed at month end
Voids	10. Number of void bedspaces at month end
	11. Of 10, number of bedspaces void for 90 days or more
Outcomes	12. Number of tenancy ends to-date (all time)
	13. Of 12, number of positive tenancy ends
	14. Of 12, number of negative tenancy ends
	15. Number of tenancy ends within the month
	16. Of 15, number of positive tenancy ends
	17. Of 15, number of negative tenancy ends

The GLA may, at its discretion, request further details or evidence of the above.

Schedule 4

Special Conditions

1 [XXX][1]

[1] To be updated if any bespoke conditions are applicable.

Schedule 5

Safeguarding and Serious Incidents Policy

MAYOR OF LONDON

GLA Rough Sleepers' Services Safeguarding and Serious Incident Policy

MAYOR OF LONDON

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MAYOR OF LONDON

1 Introduction

1.1 This policy sets out the GLA's policies on safeguarding adults at risk and the handling of serious incidents within services commissioned by the GLA's Rough Sleeping Commissioning Team.

1.2 The GLA does not have the same role and statutory responsibility as local authorities with regard to safeguarding so services should be aware of and always follow the safeguarding procedures of the local authority in which the individual resides and the safeguarding policies and procedures of any local authority whose residents are in their care. Local authorities in London have adopted a common set of policies and procedures to which service providers should have regard – *London Multi-Agency Adult Safeguarding Policy & Procedures* – published by the London Safeguarding Adults Board.

1.3 The GLA does not have the same duty of investigation in respect to safeguarding enquiries as local authorities and safeguarding alerts should not be made to the GLA for this reason.

1.4 However, the GLA does have a duty as a commissioner to ensure that the services we commission have safeguarding procedures in place and are able to correctly and expediently respond to safeguarding concerns. The GLA also has a duty to ensure its services are safe and well run and that the services we commission have procedures and policies for minimising, handling, investigating and learning from serious incidents.

1.5 The GLA also has a duty as a service commissioner to investigate patterns of safeguarding incidents and serious incidents that occur in or in relation to the services it commissions in order:

- To enable the GLA to monitor the incidence and types of safeguarding incidents and serious incidents reported and to identify any trends so that learning can take place across commissioned services.
- To enable the GLA to monitor the outcomes and action plan implementation from the investigation of safeguarding incidents and serious incidents in commissioned services in order to share the learning locally and ensure the services it funds are performing well.
- To ensure that safeguarding incidents and serious incidents are handled appropriately.

2 Glossary and useful acronyms

Abuse includes physical, sexual, emotional, psychological, financial, material, neglect, acts of omission, discriminatory and institutional abuse.

ADASS (Association of Directors of Adult Social Services) is the national association for directors of local authority adult social care services.

Adult at risk is a person aged 18 or over who is in need of care and support (whether or not those needs are being met), who is experiencing or at risk of abuse or neglect, and because of those needs is unable to protect themselves against the abuse or neglect or the risk of it. The term replaced 'vulnerable adult'.

Advocacy is supporting a person to understand information, express their needs and wishes, secure their rights, represent their interests and obtain the care and support they need

Capacity is an individual's ability to make a decision about a particular matter at the time the decision needs to be made (as detailed in the Mental Capacity Act 2005 Code of Practice).

Care setting/services includes health care, nursing care, social care, domiciliary care, social activities, support setting, emotional support, housing support, emergency housing, befriending and advice services and services provided in someone's own home or other setting for a person by means of a personal budget.

Concern is the term used to describe when there is or might be an incident of abuse or neglect and it replaces the previously used term of 'alert'.

Enquiry establishes whether any action needs to be taken to stop or prevent abuse or neglect, and if so, what action and by whom the action is taken. Previously this may have been referred to as a 'referral'.

Enquiry Lead is the agency who leads the enquiry described above.

Enquiry Officer is the member of staff who undertakes and co-ordinates the actions under Section 42 (Care Act 2014) enquiries.

GLA the Greater London Authority.

SAPB (Safeguarding Adults Partnership Board) represents various organisations in a local borough who are involved in safeguarding adults and sets the local strategic approach to safeguarding adults at risk in the area.

Serious case review (adults) is undertaken by a Safeguarding Adults Partnership Board (SAPB) when a serious case of adult abuse takes place. The aim is for agencies and individuals to learn lessons to improve the way in which they work.

SI (Serious Incident) is a term defined as an incident that occurred in relation to services resulting in significant harm or unexpected or avoidable death of one or more patients, staff, visitors or members of the public.

Significant harm is not only ill treatment (including sexual abuse and forms of ill treatment which are not physical), but also the impairment of, or an avoidable deterioration in, physical or mental health, and the impairment of physical, intellectual, emotional, social or behavioural development.

Staff, for the purposes of this protocol, relates to staff in services commissioned by the GLA as well as staff working directly for the GLA. Unless specifically excluded, staff will also include volunteers used by commissioned services and the GLA.

Vital Interest is a term used in the General Data Protection Regulation (GDPR) to permit sharing of information where it is critical to prevent serious harm or distress, or in life-threatening situations

Wilful neglect is an intentional or deliberate omission or failure to carry out an act of care by someone who is responsible for the care of a person who lacks capacity to care for themselves.

3 Aims of this policy

3.1 The aims of this policy are twofold:

- To ensure that GLA-funded service providers are clear about how to manage safeguarding enquiries for adults at risk.
- To ensure that other serious incidents that take place within or in relation to services are well handled, reported, learnt from and their occurrence reduced. It should be noted that an event can be both a serious incident and a safeguarding concern.

3.2 This policy is not intended to replace safeguarding and serious incident policies already held by agencies, nor does it replace any specific requirements outlined in contractual service specifications or in any way affect the providers' need to act within the law. This policy is designed to supplement existing policies and procedures.

4 Objectives of the policy

4.1 The GLA has a duty to ensure that service users receive a safe, secure and appropriate service. This policy aims to ensure that:

- Commissioned services take steps to minimise the risk of serious incidents and/or abuse of adults at risk.
- Staff in services are fully aware of the service's serious incidents policy and safeguarding procedures, and also this policy.
- Where incidents or abuse does occur that services take immediate remedial action and draw lessons from the subsequent reporting and investigation which will enable them to prevent such incidents or abuse in future and share these conclusions with other services
- The GLA and all commissioned services comply with legislation and partnership policies.

4.2 The service, or its parent organisation must have, its own serious incidents policy and procedures and be able to demonstrate this to the GLA Rough Sleeping Team on request.

4.3 The service must also keep accurate records of all serious incidents to enable review and audit to take place. These records must be open to review and audit by the GLA Rough Sleeping Team on request.

4.4 It is expected that service providers will provide their staff with appropriate training so they will be able to identify and respond to serious incidents in the manner set out in this policy and the service's own policies and procedures.

5 Definitions

5.1 The definition of a serious incident is broad and is expected to be covered within the service provider's own policies and procedures. It is expected that this will include all incidents involving the following:

- serious crime or violence to service users, staff or members of the public
- serious threats to service users, staff or members of the public
- unexpected death or serious injury within the service
- unexpected emergency admission to hospital

- incidents that lead to a serious disruption of a funded service e.g. fire, flood, power failure, bomb threats
- any incident that leads to a Safeguarding Adults/Children Concern being raised

5.2 An adult at risk, formerly described as a vulnerable adult, is described as:

> *A person aged 18 or over who is in need of care and support (whether or not those needs are being met), who is experiencing or at risk of abuse or neglect, and because of those needs is unable to protect themselves against the abuse or neglect or the risk of it.*[1]

5.3 For the services commissioned by the GLA the most likely people to be assessed as at risk are:

- those suffering from mental illness
- those who lack capacity (this may be caused by impairment related to alcohol or drugs).
- elderly or frail
- from different cultural backgrounds with limited English
- those who have physical or sensory disability
- those who have a learning disability
- those who suffer from a severe and incapacitating physical illness.

5.4 Abuse is defined as:

- Physical abuse – includes assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- Domestic abuse – includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over, who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, financial, emotional abuse and 'honour' based violence.
- Sexual abuse - includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure, sexual assault and sexual acts to which the adult has not consented or was pressured into consenting.
- Psychological abuse - includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation, unreasonable and unjustified withdrawal of services or supportive networks.
- Financial abuse - includes theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements including in connection with wills, property, inheritance or financial transactions and the misuse or misappropriation of property, possessions or benefit.
- Modern slavery – includes slavery, human trafficking, forced labour and domestic servitude.
- Discriminatory abuse - includes harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion.
- Neglect and acts of omission - includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services and/or the withholding of the necessities of life, such as

[1] *London Multi-Agency Adult Safeguarding Policy & Procedures* **(2019, London Safeguarding Adult Board)**

medication, adequate nutrition and heating. Neglect also includes a failure to intervene in situations that are dangerous to the person concerned or to others, particularly where the adult at risk lacks the mental capacity to assess risk for themselves.

- Institutional abuse - includes neglect and poor professional practice. This may take the form of isolated incidents of poor and unsatisfactory professional practice, through to pervasive ill treatment or gross misconduct.
- Self-neglect – includes a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. It should be noted that self-neglect may not always prompt a section 42 enquiry. An assessment should be made on a case by case basis.

6 Relevant policies and guidance

6.1 It is intended that this policy should be used in conjunction with the London multi agency policies and procedures to safeguarding adults from abuse (*London Multi-Agency Adult Safeguarding Policy & Procedures*) and any additional policies and or guidance of the local authority in which the service is based. It may also be necessary to follow the reporting requirements of any authority outside London whose resident is using a GLA commissioned service.

6.2 Providers of services commissioned by the GLA should also have regard to the following guidance:

- London Multi-Agency Adult Safeguarding Policy & Procedures (2019, London Safeguarding Adult Board)
- (for charitable organisations) How to report a serious incident in your charity (2014, Charity Commission).
- Disclosure and Barring Service rules, guidance and support (2021, Home Office).

6.3 Providers of services commissioned by the GLA should also have regard to the following legislation:

- Care Act (2014)
- Mental Capacity Act (2005)
- Human Rights Act (1998)
- Mental Health Act (1983)
- Safeguarding Vulnerable Groups Act (2006)
- Equality Act (2010)
- Data Protection Act (2018).

7 Confidentiality

7.1 Staff must be aware that information concerning an allegation of abuse and any client details must be shared on a 'need to know' basis only, taking care to protect client confidentiality. Staff must also be aware of how decisions on breaching client confidentiality when it is in the best interest of a client or in the wider public interest are made by the commissioned service provider. Commissioned services must be able to demonstrate they have the processes in place to make decisions regarding safeguarding and client confidentiality fairly and appropriately.

7.2 Guidance from the Social Care Institute for Excellence (SCIE) details when organisations need to share safeguarding information with the right people at the right time to:

- prevent death or serious harm
- coordinate effective and efficient responses
- enable early interventions to prevent the escalation of risk
- prevent abuse and harm that may increase the need for care and support
- maintain and improve good practice in safeguarding adults
- reveal patterns of abuse that were previously undetected and that could identify others at risk of abuse
- identify low-level concerns that may reveal people at risk of abuse
- help people to access the right kind of support to reduce risk and promote wellbeing
- help identify people who may pose a risk to others and, where possible, work to reduce offending behaviour
- reduce organisational risk and protect reputation.

7.3 As outlined in Section 1.1.5 of *London Multi-Agency Adult Safeguarding Policy & Procedures*, whenever possible, informed consent to the sharing of information should be obtained. However:

- Emergency or life-threatening situations may warrant the sharing of relevant information with the relevant emergency services without consent.
- The law does not prevent the sharing of sensitive, personal information within organisations. If the information is confidential, but there is a safeguarding concern, sharing it may be justified.
- The law does not prevent the sharing of sensitive, personal information between organisations where the public interest served outweighs the public interest served by protecting confidentiality – for example, where a serious crime may be prevented.

7.4 If a person refuses intervention to support them with a safeguarding concern, or requests that information about them is not shared with other safeguarding partners, their wishes should be respected. However, there are a number of circumstances where the practitioner can reasonably override such a decision, including:

- the person lacks the mental capacity to make that decision – this must be properly explored and recorded in line with the Mental Capacity Act
- other people are, or may be, at risk, including children
- sharing the information could prevent a crime
- the alleged abuser has care and support needs and may also be at risk
- a serious crime has been committed
- staff are implicated
- the person has the mental capacity to make that decision but they may be under duress or being coerced
- the risk is unreasonably high and meets the criteria for a multi-agency risk assessment conference referral
- a court order or other legal authority has requested the information.[2]

7.5 Whether information is shared with or without the adult at risk's consent, the information sharing process must abide by the principles of the General Data Protection Regulation (GDPR). The GDPR should not be a barrier to sharing information. It provides a framework to ensure that personal information about living persons is shared appropriately.

[2] *Safeguarding adults: sharing information* (2019, Social Care Institute for Excellence)

7.6 Staff should also refer to their organisation's Data Protection and Sharing Agreement with the GLA and relevant partners.

8 Responsibilities

8.a Responsibilities of the GLA

8.1 The GLA as a service commissioner will ensure that safeguarding requirements and expectations are included in all contracts, funding agreements and service specifications for services that it commissions or otherwise funds.

8.2 The GLA will also ensure that safeguarding is integrated into contract monitoring and contract management processes. The GLA will also have procedures in place to carry out audits of the safeguarding procedures, policies and any incidents which have occurred in relation to services it commissions and from time to time will carry out an audit of services its commissions and report on this audit.

8.3 The GLA will ensure that safeguarding issues reported to it through the contract monitoring of services are also being reported to the relevant local authority/Safeguarding Adults Board.

8.4 The GLA will attend when required relevant local Safeguarding Adults Boards in its role as a commissioner of support services. The GLA will also require commissioned services to attend or otherwise support Safeguarding Adults Boards as required and participate in Serious Case Reviews commissioned by Safeguarding Adult Partnership Boards.

8.5 The GLA will promote learning and best practice on safeguarding amongst all the services it commissions or otherwise funds.

8.b Responsibilities of commissioned services

8.6 Commissioned services will ensure that they have their own internal safeguarding and serious incidents and safe recruitment policies and procedures and that these are compatible with this policy and all the policies referenced above. If these policies are reviewed and updated, new versions should be sent the GLA's Rough Sleeping Commissioning Team.

8.7 Commissioned services will ensure their staff, including temporary staff employed either by an agency or directly by the service provider, and volunteers are fully trained on safeguarding and serious incident polices and procedures and that staff and volunteers regularly attend refresher training. The training staff or volunteers receive should be appropriate to their job role.

8.8 Staff, including temporary staff employed either by an agency or directly by the service provider, and volunteers will be appropriately vetted and commissioned services will have safe recruitment practices.

8.9 Commissioned services will make service users aware of their safeguarding and serious incidents policies and procedures, in particular in relation to alerting the service or an independent organisation of a safeguarding concern.

8.10 Commissioned services will report safeguarding concerns to the relevant local authority using that local authority's policies and procedures. Commissioned services will also report safeguarding concerns to the GLA using the procedures in the section 9 of this document.

8.11 Commissioned services will attend Safeguarding Adults Boards where appropriate and support them in their work when required; commissioned services will support Serious Case Reviews.

8.12 Commissioned services will support all multi agency safeguarding investigations regarding their clients or service led by local authorities and will carry out their own investigation as agreed as part of the multi agency investigation.

8.13 Commissioned services will keep clear local records on all serious incidents and safeguarding concerns/enquiries and ensure that these are reviewed to identify all key learning and action points at an appropriately senior level at least annually.

8.14 Regularly review and audit their safeguarding and serious incidents policies and procedures at a high level within the organisation and report the findings of these reviews to the GLA and any relevant local authority.

8.15 Support the GLA in its conduct of any review or audit of safeguarding or serious incidents policies and procedures.

8.16 Commissioned services will have a whistle blowing policy and ensure that staff and volunteers are aware of when and how to use it.

8.17 Commissioned services will refer staff and volunteers to the Independent Safeguarding Authority and/or Professional Regulatory Body when appropriate.

9 Reporting serious incidents to the GLA

9.a Reporting requirements

9.1 In process terms, all safeguarding events which lead to a safeguarding concern being issued should be reported to GLA commissioners as if they were serious incidents.

9.2 It is expected that all serious incidents are reported to the GLA's Rough Sleeping Commissioning Team as soon as practical following the event but at least within forty-eight hours, with a password protected incident report. Password to be provided by the GLA's Rough Sleeping Team.

9.3 This incident report should include all details that are known including:

- date of incident
- description of incident
- all parties involved
- involvement of emergency services
- immediate action taken
- further action required
- dates when further action required will be taken and/or completed
- who reported/discovered the incident
- who is managing the incident
- where the incident was reported

9.4 The report should be completed within forty-eight hours and sent by e-mail to the GLA's Rough Sleeping Team. The support provider should inform the GLA's Rough Sleeping Team on subsequent progress against any actions required at contract monitoring meetings or upon specific request for this information at an earlier date.

9.5 The report should come on the service's own incident reporting forms as long as they include the information listed in 9.3 above.

9.6 If an incident is identified as exceptionally serious the service should contact the GLA Rough Sleeping Team immediately by telephone as well as preparing to report in the usual way.

9.7 Where a serious incident has occurred that is not a safeguarding incident the service should consider whether it would be appropriate to also report the incident to any relevant local authority. Cases where this might be appropriate would be:

- A member of staff has suffered a serious injury whilst operating on a local authority run housing estate or service.
- An incident of arson or attempted arson at the service
- A serious anti-social behaviour incident or a sustained period of anti-social behaviour.

9.b Additional reporting requirements where the serious incident is also a safeguarding concern

9.8 When the serious incident to be reported has also led to a safeguarding concern being raised the following information should also be included in the serious incident report:

- nature of the safeguarding concern
- whether any children were directly or indirectly involved
- details of the safeguarding authority the concern was raised with.

9.9 The service must also report to the GLA's Rough Sleeping Team whether or not any safeguarding concern was accepted as a safeguarding enquiry as soon as possible after the decision has been made.

9.10 If the safeguarding concern is required to be sent on a local authority alert form then this will be an acceptable method of communicating the information to the GLA's Rough Sleeping Team – additional information should be appended if necessary.

10 Reporting safeguarding incidents to local authorities

10.1 In addition to the requirements to report to the GLA Rough Sleeping Team services must also report safeguarding concerns to the relevant team undertaking safeguarding adult work.

10.2 This will always include the local authority where the subject of the concern is currently residing, even in instances where another local authority is funding the subject of the concern's care and/or housing.

10.3 Where another local authority is funding the subject of the concern's care and/or housing in another local authority they must also be sent details of the safeguarding concern . However, the duty to ensure there is a response to the safeguarding concern remains with the local authority where the subject of the concern is currently residing. However. in some cases it may be more relevant for the placing authority to undertake this work – for instance, when it is abuse by family friends in the placing authority area

10.4 Reporting of concerns to the relevant local authorities should take precedence over reporting to the GLA Rough Sleeping Team. Ideally, reports should be made at the same time but

reporting to the GLA should not impede the reporting of the safeguarding concern to the relevant local authority.

11 Reporting other incidents and 'near misses'

11.1 There may be times where it is identified that there was a substantial risk of a serious incident occurring even if one did not come to pass. These will be described here as 'near misses'.

11.2 When 'near misses' occur they should be recorded in the same way as serious incidents.

11.3 Services' serious incidents policies and procedures should also cover 'near misses' and the procedures for handling and learning from these events.

11.4 It is not required that 'near misses' are reported immediately to the GLA, although it would be considered good practice to do so. However, these must be reported at contract monitoring meetings to the GLA's Rough Sleeping Team within the performance monitoring narrative reports.

11.5 There may also be incidents that occur which do not in themselves constitute serious incidents or safeguarding concerns. Examples of this could be:

- minor accidental injuries sustained within the project
- incidents causing a minor service disruption (ie: a flooded room, power outage).

11.6 Services should have their own policies and procedures for handling these incidents and they should be recorded in a way that makes them easy to report on and audit.

11.7 More significant examples of these incidents should be reported to the GLA's Rough Sleeping Team at contract monitoring meetings.

11.8 If a series of these more minor incidents of a similar type occur in quick succession, involving or affecting the same client for example, then the service should treat the series of incidents as a single serious incident and follow the reporting requirements outlined above.

Schedule 6

Project Report Template

Quarterly monitoring

OPS Block: Claims & Milestones block

Identified Projects

For Identified Projects, the Revenue Recipient will be required to complete and submit a quarterly Project Report which should be uploaded alongside submission of the relevant claim(s).

The quarterly Project Report should provide, as a minimum, the following information:

Category	Data to be collected	Field	Applicable schemes
Service information	Number of FTE staff in post at quarter end	Numerical	All
	Narrative re. vacant posts, interim arrangements and expected timelines for recruitment	Text	All
Voids	Number of units void for 90+ days at quarter end	Numerical	All
	Narrative re. reasons for long-term voids	Text	All
Referrals	Number of referrals received within quarter	Numerical	All
	Of referrals received, number accepted into service	Numerical	All
	Breakdown of source of referral by service	Numerical	All
	Borough split of referrals	Numerical	Sub-regional and pan-London schemes only
Service users	Number of service users housed at quarter end	Numerical	All
	Of service users housed, number that meet the target client group outlined on OPS	Numerical	All
	Narrative reasons for services users not within target client group	Text	All
Length of stay	For service users housed on the last day of the quarter (snapshot) provide a breakdown of length of stay (e.g. 0-3 months, 3-12 months, 12-24 months, 24+ months)	Numerical	All
Tenancy related outcomes	Number of service users engaging with the support service	Numerical	All
	Number of service users with a support plan in place	Numerical	All

(Snapshot at quarter end)	Number of service users with a move-on plan in place	Numerical	Some schemes – where move-on is an expected outcome (not appropriate for Housing First)
	Number of service users with an active HB/UC claim in place	Numerical	All
	Number of service users in rent arrears	Numerical	All
Health related outcomes (Snapshot at quarter end)	Number of service users with drug misuse needs linked with relevant services	Numerical (X out of X service users)	All
	Number of service users with alcohol misuse needs linked with relevant services	Numerical (X out of X service users)	All
	Number of service users with mental health diagnoses linked with relevant services	Numerical (X out of X service users)	All
	Number of service users with physical health conditions linked with relevant services	Numerical (X out of X service users)	All
	Number of service users registered with local GP	Numerical (X out of X service users)	All
Employment Training and Education related outcomes (Snapshot at quarter end)	Number of service users with ETE needs linked to relevant services	Numerical (X out of X service users)	Some – where ETE is an intended outcome
	Number of service users in paid employment	Numerical	
	Of the above, number who started paid employment since entering SHAP	Numerical	
	Number of service users in training or education	Numerical	
	Of the above, number who started training or education since entering SHAP	Numerical	
General Narrative	General narrative on the Project, including partnership work done in the quarter and any other issues the Revenue Recipient would like to raise	Text	All
Incident reporting	Incident type	Text	All
	Short narrative – description and steps taken	Text	All
Complaints & Appeals	Complaints and appeals, detailing number and nature of complaints/appeals, outcomes, and any other relevant info.	Text	All

The GLA may, at its discretion, request further details or evidence of the above.

Non-Identified Projects

OPS Block: Claims & Milestones block

For Non-Identified Projects, the Revenue Recipient will not be required to submit a full quarterly Project Report, however the Revenue Recipient will be required to confirm, alongside submission of relevant claim(s) that they have completed appropriate monitoring and oversight of the service being delivered by the service provider and that the objectives of the service are being delivered in-line with the bid set out on OPS.

The following is an example of the format that this representation should take:

> *I confirm that a quarterly monitoring report for the Named Project has been received and a monitoring meeting carried out with* [NAME OF SUPPORT PROVIDER] *on* [DATE].
>
> *I confirm that the outputs and outcomes of the service are being delivered in-line with the Named Project description on OPS.*
>
> *I confirm that the GLA has been notified of any serious incidents or issues that may present reputational risk which occurred in the quarter.*
>
> [NAME] [POSITION]

OR

> *I confirm that a quarterly monitoring report for the Named Project has been received and a monitoring meeting carried out with* [NAME OF SUPPORT PROVIDER] *on* [DATE].
>
> *I confirm that performance of the service is currently below expectation but the GLA has been made aware and a plan of action to improve performance has been put in place.*
>
> *I confirm that the GLA has been notified of any serious incidents or issues that may present reputational risk which occurred in the quarter.*
>
> [NAME] [POSITION]

The GLA may, at its discretion, request further details or evidence of the above including such evidence as minutes of monitoring meetings and monitoring reports.

Schedule 7

SPEI Assignment

Tasks assigned under this Agreement (SPEI services): the Tenancy Support Services

SPEI enterprise: the Recipient (save where the Recipient is a local authority)

Delivery period: the Funding Period

Geographic area: Greater London

Compensation for delivery of tasks: the Grant Payments, subject to the terms of this Agreement

Arrangements for review and recovery: as set out at clause 4.4 and clause 8.3 of this Agreement

Report for: Cabinet 6 February 2024

Title: Gateway 3A - Acquisition at pre-construction stage of 38 sheltered homes within Phase 1 of the St. Ann's General Hospital development, St Ann's Road, N15 3TH; granting a pedestrian easement plus entering into an Option Agreement for purchasing a further 116 homes in subsequent phases.

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Report authorised by : David Joyce

Lead Officer: Robbie Erbmann

Ward(s) affected: Hermitage and Gardens

Report for Key/ Non Key Decision: Key Decision

1. Describe the issue under consideration

1.1. This report provides an update on the deal structure proposed for the phased purchase of new homes at the Peabody Group (PG) development on GLA-owned land at St. Ann's General Hospital, St Ann's Road, N15 3TH. It requests authority to acquire 38 homes within the first phase at pre-construction stage and also for the granting of a pedestrian easement over Council land adjacent to the site. It also proposes a further Option Agreement for purchasing up to 116 additional homes in subsequent phases, subject to Cabinet approval.

1.2. This kind of acquisition is, alongside direct delivery, an integral part of the Council's programme to deliver a new generation of Council homes in Haringey. This report sets out the reasons for this acquisition: these include the overwhelming need for affordable homes, the robust business case for the acquisition, and the high quality of the 38 homes that would be delivered for households in the greatest need.

1.3. The Forward Plan entry for this paper is amended to reflect the title of the paper. This is due to the project now coming forward at formula rent rather than London Affordable Rent and to recognise that decisions regarding further acquisitions under the Option Agreement will need to be taken by Cabinet.

2. Cabinet Member Introduction

2.1. The St Ann's Hospital site is of key strategic importance to the Council. The 154 affordable, high quality, and sustainable Council homes will make a meaningful contribution to our commitment to build 3000 Council homes by 2031.

2.2. The first phase of the scheme will see the acquisition of 38 homes to be used as sheltered accommodation for Haringey residents over 55 years old. Subsequent phases of the scheme will include the purchase of 116 homes, delivering a total of 154 affordable homes for residents on the Council's Housing Register. This acquisition is supported by GLA Grant Funding which is essential for the success of our housing programme in this difficult economic climate.

2.3. In line with our commitment to tackle the climate emergency, the St Ann's Hospital site is designed to be a highly sustainable and low carbon neighbourhood. The masterplan includes provision for nearly 2000 cycle spaces, safe pedestrian and cycle routes, extensive urban greening measures and biodiversity gains, water efficient fittings, bio-solar roofs, and smart architecture to design out various effects of climate change.

3. Recommendations

3.1. Cabinet is asked to:

3.1.1. Approve the long leasehold acquisition (for housing purposes) at pre-construction stage of 38 sheltered homes and ancillary communal spaces at block C1 within Phase 1 of Peabody Group scheme on GLA-owned land at St. Ann's General Hospital, St Ann's Road, N15 3TH for the purchase price set out in the Exempt Part B report and on the basis set out in the Heads of Terms in the Exempt Part B report.

3.1.2. Consider the representations made and set out in paragraphs 6.21 to 6.30 as a result of the consultation carried out under section 105 of the Housing Act 1985 and approve the granting of a Pedestrian Easement for public use across adjacent Council owned land (shown coloured blue on the first plan at Appendix 2) held in the Housing Revenue Account portfolio, for the value set out in the Exempt Part B report, netted off the purchase price;

3.1.3. Approve the Total Scheme Cost, including the on-costs budget and contingency allowances, as well as the rent levels and GLA grant subsidy as set out in the Exempt Part B report;

3.1.4. Grant delegated authority to the Director of Placemaking and Housing in consultation with the Director of Finance (S151 Officer), the Head of Legal and Governance and Cabinet Member for Council House-building, Placemaking and Local Economy to agree the final terms of the acquisition including legal documentation and complete the transactions for the long leasehold acquisition, associated Development Agreement, pedestrian easement and Option Agreement; and

3.1.5. Approve the entering into an Option Agreement with Peabody Group for purchasing up to a further 116 affordable homes in subsequent phases of the St Ann's Hospital development.

4. Reasons for decision

4.1. The acquisition of these residential units will allow the Council to secure the delivery of 38 new Council homes for use as sheltered accommodation for older people.

4.2. There is an overwhelming need for affordable homes in Haringey. This acquisition will help the Council provide accommodation for rent to those on the Council's Housing Register who most need them and help the Council fulfil its political commitment to build 3000 Council homes by 2031.

4.3. The homes to be delivered are very well located and will be high quality, within a major strategic regeneration scheme of significant local importance.

4.4. The acquisition is supported by GLA Grant Funding.

5. Alternative options considered

5.1. *Not to acquire the homes.* This option has been rejected as doing so would both result in significant abortive costs and represent a missed opportunity for the Council to:

- Secure 38 homes to let as social rent tenancies.
- Avail of substantial GLA Grant Funding.
- Assist in maintaining momentum and progress in the overall aspiration to provide affordable housing in the borough.
- Enter into an option agreement for a further up to 116 affordable homes in subsequent phases of the scheme.

6. Background information

6.1. St Ann's Hospital is located within the St Ann's area in the southern part of the Borough. The overall site area is c. 7.2 hectares (17.8 acres). It is bounded by St. Ann's Road to the north, Hermitage Road to the east, a railway line to the south leading to Harringay Green Lanes Station and the rear of LB Haringey housing along Warwick Gardens to the west. It is directly opposite Chestnuts Park (See location Plan at Appendix 1).

6.2. St Ann's Hospital was formerly owned by Barnet, Enfield and Haringey Mental Health NHS Trust who secured a planning consent for a scheme comprising 456 homes alongside commercial facilities, with a view to disposal to fund upgrading/extension of retained facilities. That permission was not implemented and has expired.

6.3. The land was subsequently purchased by the GLA with a view to significantly increasing density as well as delivering a higher than policy level of genuinely affordable housing. The GLA competitively procured the PG and Hill Group joint venture partnership to secure planning and deliver the redevelopment.

6.4. PG and Hill Group have since achieved planning approval for a masterplan of up to 995 homes alongside workspace, community space and new landscaped public realm. 60% of these homes will be affordable with those not acquired by the Council remaining with PG or being transferred to a Community Led Housing Group. In total across the masterplan 358 homes are scheduled to be let at affordable rent.

6.5. It is proposed the Council acquires the initial phase of 38 homes, with an option to acquire up to a further 116 (subject to future Cabinet approval), totalling 154 homes, over multiple development phases. PG intends to deliver these 154 homes over four phases – they started works on site earlier this year and anticipate final completion in 2029. The first phase is due to complete in summer 2026.

6.6. The proposed mix of homes which the Council is seeking to acquire is given below:

Phases	1bed flat	2bed flat	3bed flat	3bed house	4bed house	TOTAL
Phase 1	36	2				38
Phase 2					14	14
Phase 3	27	34	24			85
Phase 4				17		17

6.7. The planning application for Phase 1 was made in detail and the client team in Adult Services have been involved from an early stage in setting the design brief and specification for the 38 sheltered homes. The 2 bedroom flats and 4 of the 1 bedroom flats in the first phase are designed for wheelchair users. Generally the majority of Haringey residents waiting for sheltered accommodation require 1 bedroom homes, either as single tenants or couples, so the accommodation mix of the first phase reflects this.

6.8. The later phases were approved in 'outline' and as such, details of the exact mix phase by phase may change slightly as the detailed planning applications come forward in due course, but there will be a significant number of larger family-sized homes, similar to the indicative mix in the table above. The remaining 116 homes in later phases are intended to be designed and let for general needs rented housing.

6.9. The design of the sheltered accommodation at block C1 includes communal facilities for residents, staff space and a scooter store. A communal lounge has been located to the north of the block, which is triple aspect. To further increase activity and passive surveillance, ground floor homes are provided with street-facing terraces. The semi-private residential courtyard between the blocks forming Plot C is intended to be open to the public throughout the daytime, with controlled access provided through a gated system at night. This allows public use of the facilities provided within the courtyard (similar to other such spaces across the masterplan), delivering safe, secure, and welcoming communal amenity space for all.

6.10. Further specification review meetings will take place and the final arrangements for fit out and handover will be agreed by representatives from Adult Services in due course. The operating model and management structure for these homes will be defined and agreed by Adult Services during the construction phase. The homes and the associated communal facilities are designed to accommodate the needs of older residents, including if necessary, adaptations for residents with disabilities, or arrangements for visiting carers. However this scheme would not be appropriate for individuals requiring full 24/7 care.

6.11. The agreed acquisition price for the 38 homes in Phase 1 and a summary of the Total Scheme Cost is in the Exempt Part B report, along with detail of the funding arrangements agreed with the GLA. This proposed acquisition price and anticipated Development Agreement cashflow has been included within the Housing Revenue Account Business Plan.

Acquisitions and Disposal Policy

6.12. The Acquisitions and Disposals policy is contained in the Asset Management Plan February 2020 which was updated and adopted by Cabinet in February 2021. The policy sets out key 'Principles' and 'Tests' that determine alignment

with the Corporate Delivery Plan. This transaction aligns with the Corporate Delivery Plan's Housing Priority.

6.13. The policy also states that acquisitions will be considered in order to acquire completed new housing units being developed on private land, former Council land and other private housing acquired individually or in groups, which will increase the Council's stock of homes. The Council will aim to acquire via negotiation in the first instance having carried out a RICS valuation, and having assessed the business case for acquisition, including affordability.

6.14. The basis for this acquisition has been assessed and found to meet key criteria as set out in the Council's Disposal and Acquisitions Policy.

Valuation and Purchase Price

6.15. **Long Leasehold Interest:** The long leasehold interest of the land on which the homes are being built will be granted to the Council once the initial payment for Phase 1 is made at 'Golden Brick' stage.

6.16. **Pedestrian Easement:** The Council will grant a permanent pedestrian easement granting general public access across its residential estate known as Warwick Gardens. This is shown coloured blue on the first plan at Appendix 2.

6.17. **Purchase Price**: The purchase price as set out in the Exempt Part B report is at the Open Market Value for the 38 affordable homes and for granting the pedestrian easement. This value is supported by a Red Book Valuation from Carter Jonas.

Easement and 'South-West link' land

6.18. The Council-owned residential estate known as Warwick Gardens is located to the south-west of the proposed St Ann's scheme. The Warwick Gardens car park (formed of 16 car parking spaces) is included in the planning consent for the development. The land is held in the Council's Housing Revenue Account.

6.19. This land will provide public pedestrian access from the new development to the south-west, and the estate will benefit from approved improvement works (principally an amended parking layout and associated landscaping works) as part of that scheme. The Purchase Price package for the homes in block C1 includes the granting of a pedestrian easement across the land for public use. Residents at Warwick Gardens were consulted on the planned improvement works to this space adjacent to their estate in 2021, in advance of PG's planning application.

6.20. Plans showing the extent of the 'South-West link' land and the proposed improvement works are at Appendix 2

Consultation with residents at 67-109 Warwick Gardens

6.21. Under the Housing Act 1985, Section 105, the Council has a legal obligation to consult its secure tenants on matters of housing management such as changes to the management, maintenance, improvement, or demolition of houses let by them or changes in the provision of services or amenities.

6.22. In October 2021, the Council launched a Section 105 consultation based on proposals to change the use of the 'South-West link' land previously occupied by

11 garages before their demolition to create a new pedestrian and cycle access route to the new St Ann's Hospital development.

6.23. The Council consulted 25 households. In addition to consulting with secure tenants as required by law, the above figure also includes resident and non-resident leaseholders. The Council consults leaseholders as part of Section 105 consultations as a matter of good practice.

6.24. The consultation period lasted from 21 October 2021 until 22 November 2021. Information provided included a consultation pack posted to consultees which included an outline of the impact of the proposed developments on their affected amenities and a selection of site location plans, indicative plans, and associated images. A consultation questionnaire, an equality and diversity questionnaire, and a stamped addressed envelope was provided so consultees could respond by post. Contact details were provided so consultees could request further information or ask for the materials in a different format. This included a form for residents to request a translation of the consultation pack in alternative languages from the council. Non-resident leaseholders received a notification of the consultation at both their home address and the address of their property included in this consultation. The information and materials detailed above were also placed on the Council's website.

6.25. An in-person, drop-in event was held onsite on Tuesday 2 November, 2021 from 11am to 1pm. An online engagement session was also held for consultees and the wider community on Wednesday 10 November 2021, from 6pm. A recording of this meeting was available on the Council's website immediately after the close of the online event. Across both the online engagement event and the in-person, drop-in event, a total of 8 attendees joined the sessions.

6.26. 14 households responded to the consultation. A breakdown of the consultation responses by tenure is outlined below:

Overall consultation audience	Number of responses	Number of secure tenant responses	Number of leaseholder responses
25	14	4	11

6.27. Every respondent objected to the proposed loss of land which is currently used, informally, following the demolition of garages, for parking; several suggested that this would materially affect the value of their property. Concern was also raised as to the future management of parking at 67-109 Warwick Gardens. Residents were concerned about any landscaping of the area providing cover for anti-social behaviour and crime.

6.28. Respondents commented positively about improving the quality of the green space, expressing an interest in creating a better play area and for securing the boundary better between this area and the Warwick Gardens estate. Residents also noted the importance of securing their bin store, as part of securing their communal space, whilst retaining access for waste collections.

6.29. This feedback from residents has informed the proposals for the South-West link land. The third plan at Appendix 2 shows the design for this space which forms part of PG's Planning Permission, including 7 new car parking spaces, to be

formally marked out, replacing the current informal parking arrangement, alongside small areas of new planting. This new parking will be formally managed by the Council's housing team. The improvement works will also include new lighting for the pedestrian and cycle route, which should improve the safety of this area.

6.30. The S105 Consultation Report was published on the Council's website, and residents were sent further letters confirming the outcome of the consultation.

7. Proposal for purchase of homes in phases 2-4

7.1. As noted above, the Council plans to purchase up to a further 116 homes (with the number of homes per phase set out at paragraph 6.6) in phases 2 to 4 of the St. Ann's Hospital development. The anticipated timeline for these later phases is set out in the table below.

Phase	Start	Completion
2	June 2025	November 2026
3	Summer 2026	Spring 2028
4	Winter 2027	Spring 2029

7.2. Any proposal to purchase the additional affordable homes from PG in the later phases of the development would be subject to viability and formal valuation at that time.

7.3. The Heads of Terms in the Exempt Part B report also set out the proposed legal 'Call Option' arrangement by which the Council will be able to purchase additional homes in subsequent phases from PG. This Call Option arrangement will require the developer to notify the Council of the subsequent phases coming forward for planning and construction, giving the Council 'first refusal' to acquire these affordable homes, but not requiring the Council to purchase.

7.4. Officers in the Council's Housing Delivery and Property teams will then appraise the value and viability of these development phases. Further Cabinet approvals would need to be sought for the acquisition of the homes in any future phases at the St Ann's Hospital site. If the Council does not pursue the purchase of later phases of the St Ann's development, there will be no penalty or cost implication.

7.5. The subsequent phased purchase/development agreements will follow the same model as that proposed for the homes in Phase 1.

8. Contribution to the Corporate Delivery Plan 2022-2024 High level Strategic outcomes'

8.1. This acquisition, as part of the Council's broader Housing Delivery Programme will play a key role in achieving the outcomes under the CDP theme: 'Homes for the Future'. In particular, the targeted outcomes to achieve 'an increase in the number and variety of high-quality and sustainable homes in the borough' and 'an improvement in the quality of housing and resident services in the social rented sector'.

8.2. The acquisition will support housing growth in a key regeneration area.

8.3. The acquisition of homes at the St. Ann's Hospital site will make a meaningful contribution to the Council's target of 3,000 homes by the end of 2031.

8.4. In Phase 1, the 38 homes will be designated as sheltered accommodation for Haringey residents with the remaining homes to be acquired in subsequent phases being made available to Haringey residents at council rent levels. The scheme also provides the opportunity to make homes available for the bespoke housing programme.

9. Carbon and Climate Change

9.1. The St Ann's masterplan has been designed with significant input and advice from the Council's carbon management team. The homes were designed to comply with the current London Plan requirement to achieve a 35% reduction in carbon emissions beyond that required by Building Regulations Part L (2021) – this equates to an estimated reduction in regulated CO2 savings on site by 79.1%.

9.2. The proposed energy efficiency measures for the new build parts of the development include levels of insulation beyond Building Regulation requirements, in line with the LETI Climate Emergency Design Guidance and Passivhaus standards, low air tightness levels and majority dual aspect dwellings, with all windows openable. The window design maximises daylighting while minimising risk of overheating and need for cooling and ventilation. Efficient lighting and energy saving controls will also be employed. Solar panels and communal air source heat pumps will be installed for the new buildings, creating a low carbon heat network, with provision allowed for future connection to a district energy network extension.

9.3. The masterplan being delivered across the St Ann's Hospital site will be a highly sustainable and low carbon neighbourhood. The sustainability measures implemented across the masterplan include:

- No on-site NOx emissions from fossil fuel combustion
- A site-wide carbon emissions reduction of 75.9%, achieved through passive design and energy efficiency measures, air source heat pumps and photovoltaic panels
- Efficient massing design, openings and internal layouts so spaces benefit from sufficient daylight, whilst mitigating against overheating
- Water efficient fittings to limit residential consumption to <105 litres/person/day

- Promoting sustainable forms of transport with 1,734 long stay cycle parking spaces, 70 short stay cycle spaces, car club spaces, controlled car parking zones, safe pedestrian and cycle routes across the Site
- Targeting an urban greening factor of 0.415 through provision of meadows, woodlands, rain gardens, swales, open mosaic habitat and bio-solar roofs
- Protection of features of ecological value and targeting 12% biodiversity net gain, extending ecological routes and supporting local bat and bird populations
- Surface water run-off will be reduced through the installation of permeable paving, underground attenuation tanks and bio-solar roofs

10. Statutory Officers comments

Finance

10.1. Initial viability assessment indicates that this scheme is viable and can be contained within the HRA plan and is included in the current HRA/MTFS.

10.2. Further finance comments are contained in the exempt report.

Procurement

10.3. Strategic Procurement note the contents of this report and confirm there are no procurement related matters preventing Cabinet approving the Recommendations stated in paragraph 3 above.

Legal

10.4. The Council has the power under section 120 of the Local Government Act 1972 for the purposes of any of its functions under that Act or any other enactment, or the benefit, improvement or development of their area, to acquire by agreement any land, whether situated inside or outside its area.

10.5. The 38 homes to be acquired and, if the option is exercised, the remaining 116 homes will be acquired for housing purposes and therefore will be held in the Housing Revenue Account. Under section 17 of the Housing Act 1985 the Council as a local housing authority may for housing purposes acquire land as a site for the erection of houses, or acquire houses, or buildings which may be made suitable as houses, together with any land occupied with the houses or buildings. The Council will be acquiring these properties by means of a long lease for a term of 250 years. Members should note that there will be service charges to be paid by the Council to the landlord and that those monies shall be recouped from the tenants through their rents.

10.6. The Council will be entering into a Development Agreement whereby the developer will carry out the development of the 38 homes. Development agreements are works contracts. The Contract Standing Orders provides that every contract valued at £250,000 (two hundred and fifty thousand pounds) or more must contain clauses to cover the following:

a) if it is a contract for works, that the Council may require the contractor to provide security for completing the contract in the form of a bond;

b) that where the contractor is a subsidiary or group company, the contractor may be required to provide a parent or group company guarantee.
c) or other means of surety as agreed by the Director of Finance or an officer acting under his/her delegated authority

10.7. This requirement will need to be addressed prior to the Council entering into the Development Agreement.

10.8. In agreeing the option agreement care must be taken to ensure that no sale and purchase agreement is entered into before Cabinet has made a decision on the acquisition.

10.9. Members are being asked to grant an easement on land held for housing purposes and a statutory consultation was carried out pursuant to S105 of the Housing Act 1985. A consultation will not be lawful unless it is (1) undertaken at a time when proposals are still at a formative stage; (2) sufficient reasons are given for any proposal to enable people who are interested in the same to consider the proposals and make representations; (3) adequate time has been given for such consideration and response; and (4) all representations have been conscientiously taken into account when finalising the proposals. Prior to making any decision to grant the easement, members must consider the representations made in respect of that consultation.

10.10. The granting of an easement to Peabody on Council land held for housing purposes for the benefit of the scheme is a disposal and would fall within the provision of Section 32 of the Housing Act 1985. Under that section the Council may grant the easement but must first obtain the consent for the secretary of state. Where the land is vacant the Council can rely on The General Consent for the Disposal of Land held for the purposes of Part II of the Housing Act 1985 – 2013 issued by the secretary of state but must obtain best consideration.

10.11. The Cabinet is being asked to approve the budget for this acquisition which must be within the budgetary framework as approved by full Council.

Equalities

10.12. The Council has a Public Sector Equality Duty (PSED) under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

10.13. The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty. Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

10.14. The purpose of this report is to seek approval for the acquisition of 38 sheltered accommodation units and associated communal facilities in block C1 at the St Ann's Hospital site.

10.15. The objective of the decision is to increase the supply of Council housing in Haringey. The groups that the decision is most likely to directly affect are Haringey residents living in temporary accommodation and Haringey residents who are at risk of homelessness. Data held by the Council suggests that women, young people and BAME communities are over-represented among those living in temporary accommodation. Individuals with these protected characteristics as well as those who identify as LGBTQ+ and individuals with disabilities are also known to be vulnerable to homelessness, as detailed in the Equalities Impact Assessment (EqIA) of the Council's Draft new Housing Strategy. As such, it is reasonable to anticipate a positive impact on residents with these protected characteristics.

10.16. The targeting of the new sheltered accommodation at older people acts as positive discrimination to support a protected group, with no adverse impacts. The Council considers there will not be any negative impacts associated with this proposed acquisition.

11. Use of Appendices

Appendix 1: Site and Block Plans.
Appendix 2: South West Link – easement and improvement works plans.

Part B: EXEMPT –

- Total scheme cost, rent levels, grant subsidy, on costs and fees budget
- GLA grant funding arrangements
- Current Draft Heads of Terms

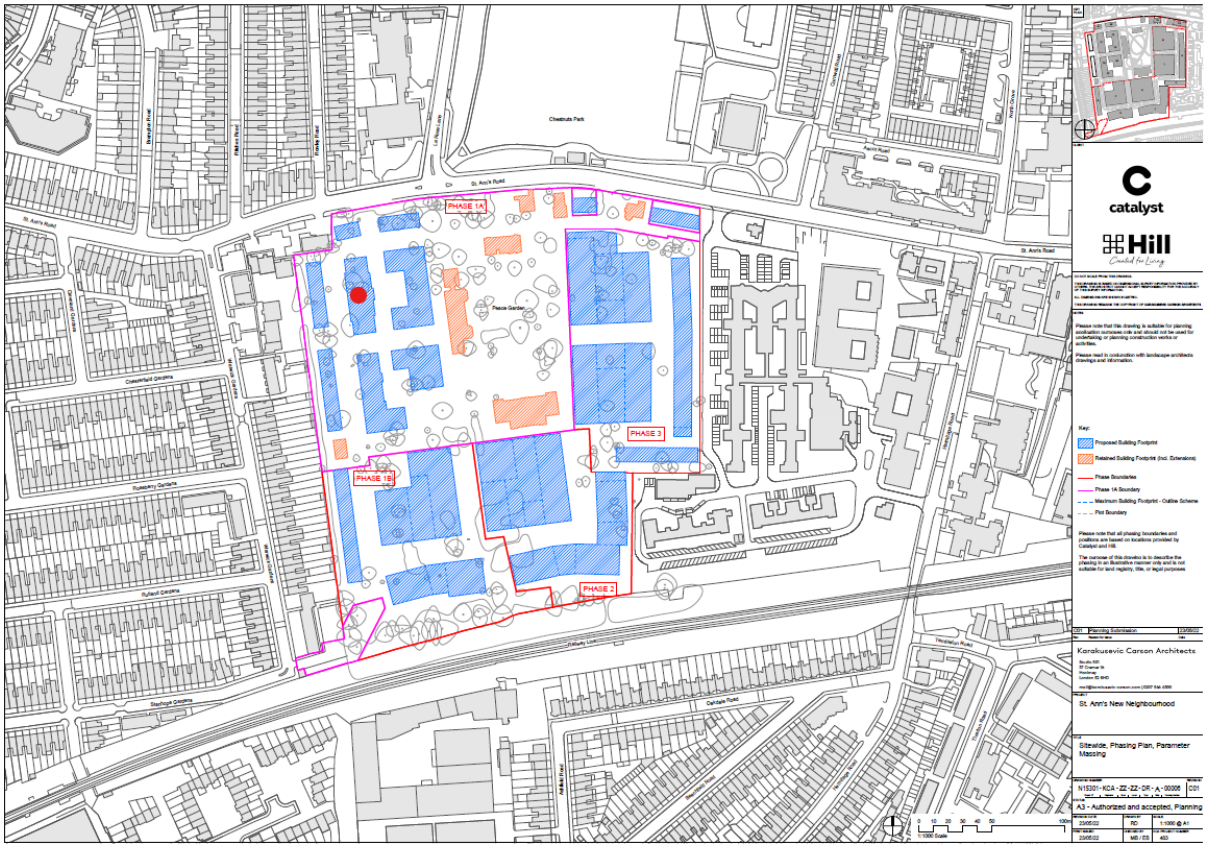
12. Background Papers

12.1. No background papers.

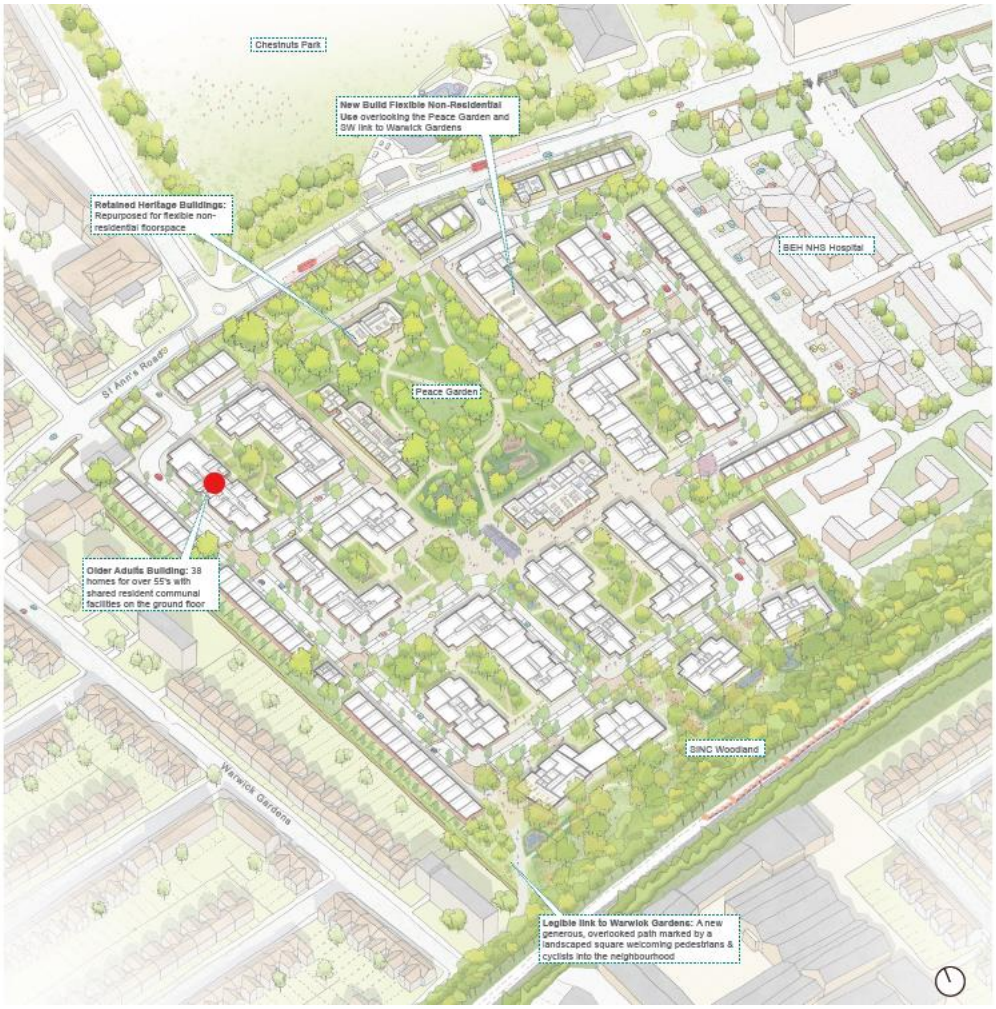
12.2. Part B of this report is NOT FOR PUBLICATION by virtue of paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972. This Part B is not for publication as it contains information classified as exempt under Schedule 12A of the Local Government Act 1972 in that it contains information relating to the financial or business affairs of any particular person (including the authority holding that information).

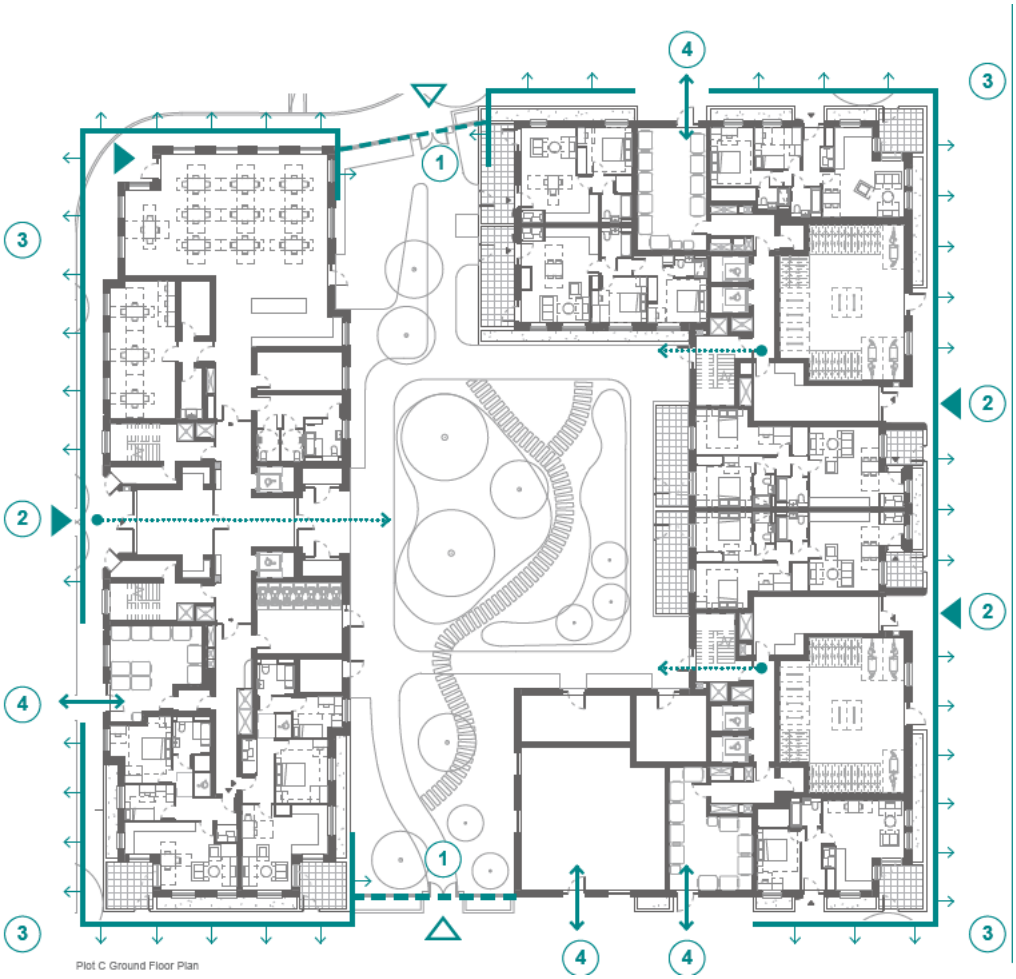
Appendix 1 – Site and Block Location Plans

Red dots on the plans below indicate plot C1, 38 homes for older people:



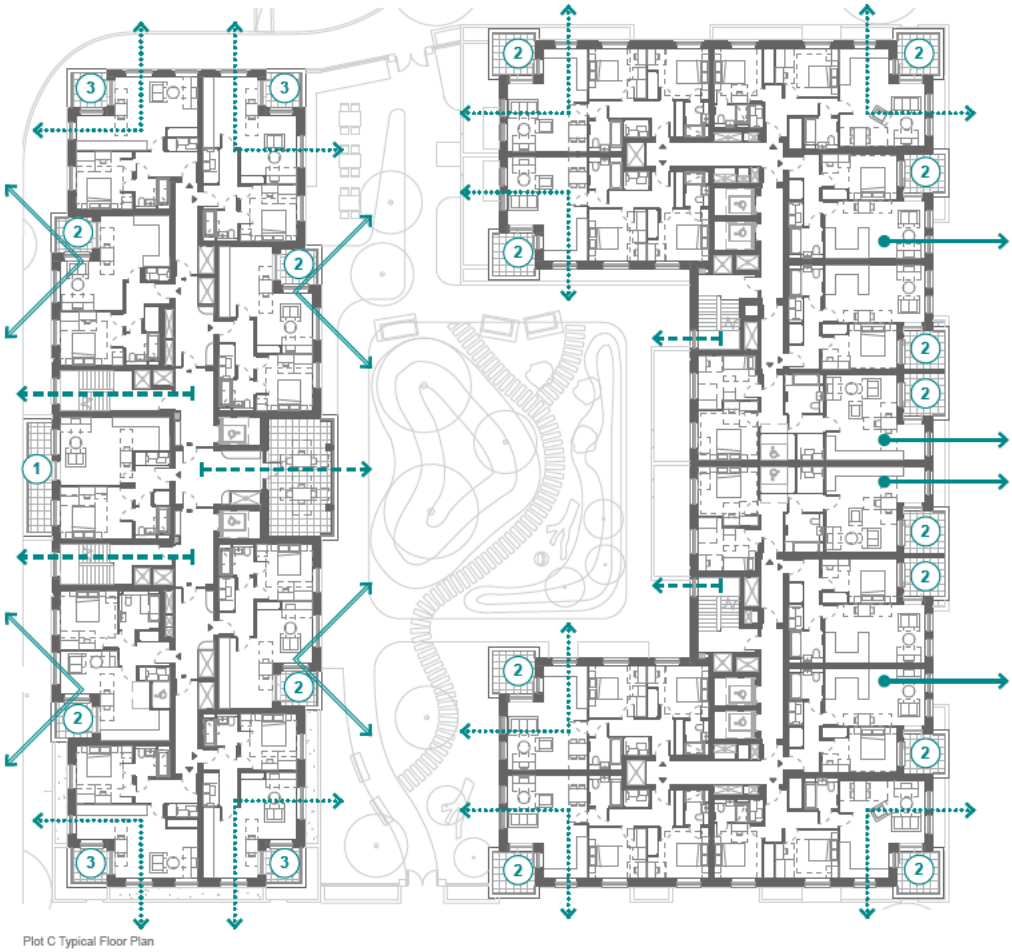

Chestnuts Park
Retained Heritage Buildings:
BEH NHS Hospital
St Ann's Road
Peace Garden
Warwick Gardens
SINC Woodland


Chestnuts Park
New Build Flexible Non-Residential Use overlooking the Peace Garden and SW link to Warwick Gardens
Retained Heritage Buildings: Repurposed for flexible non-residential floorspace
BEH NHS Hospital
St Anne's Road
Peace Garden
Older Adults Building: 38 homes for over 55's with shared resident communal facilities on the ground floor
SINC Woodland
Warwick Gardens
Legible link to Warwick Gardens: A new generous, overlooked path marked by a landscaped square welcoming pedestrians & cyclists into the neighbourhood



Key

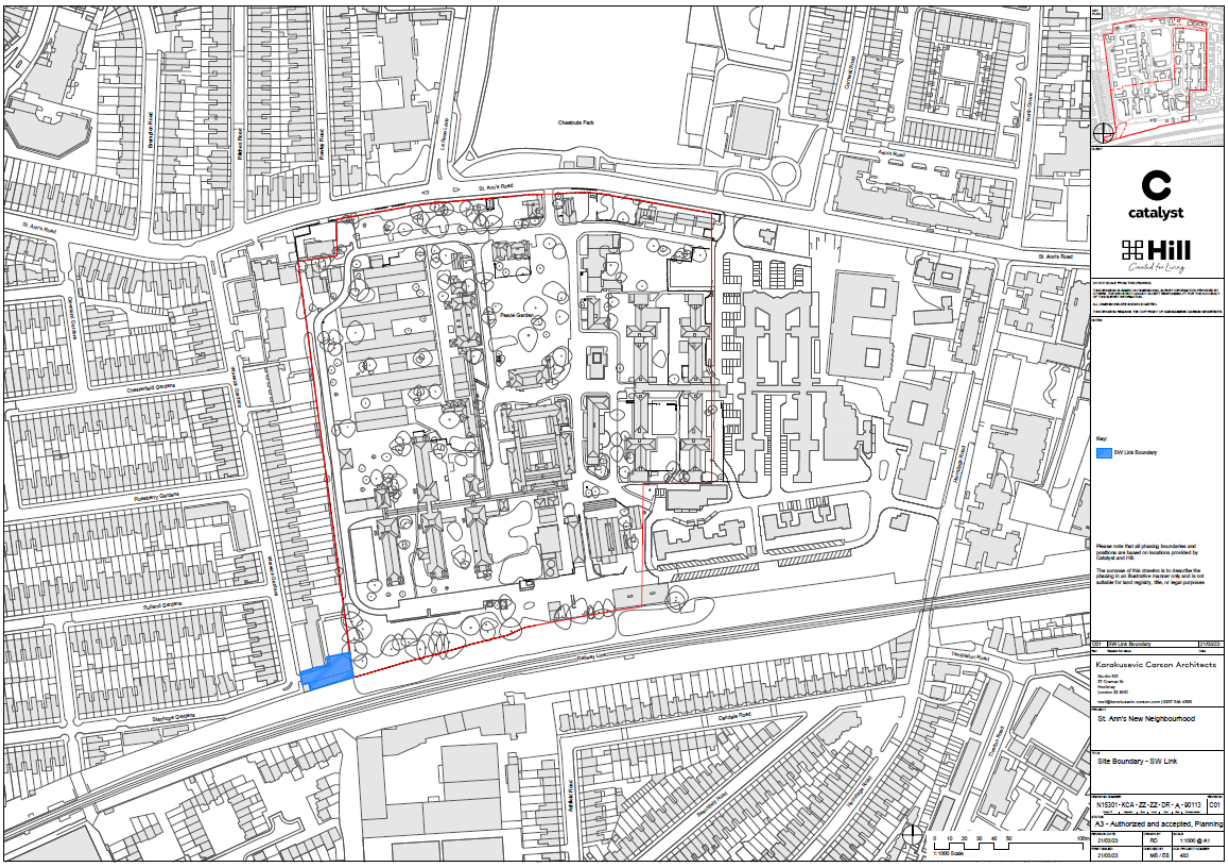
- Building Entrances
- Courtyard Entrances
- Access and Overlooking
- Active Frontages
- Ancillary Spaces
- 1 Controlled Access
- 2 Communal Entrance
- 3 Active Frontage Maximised
- 4 Refuse / Plant Spaces



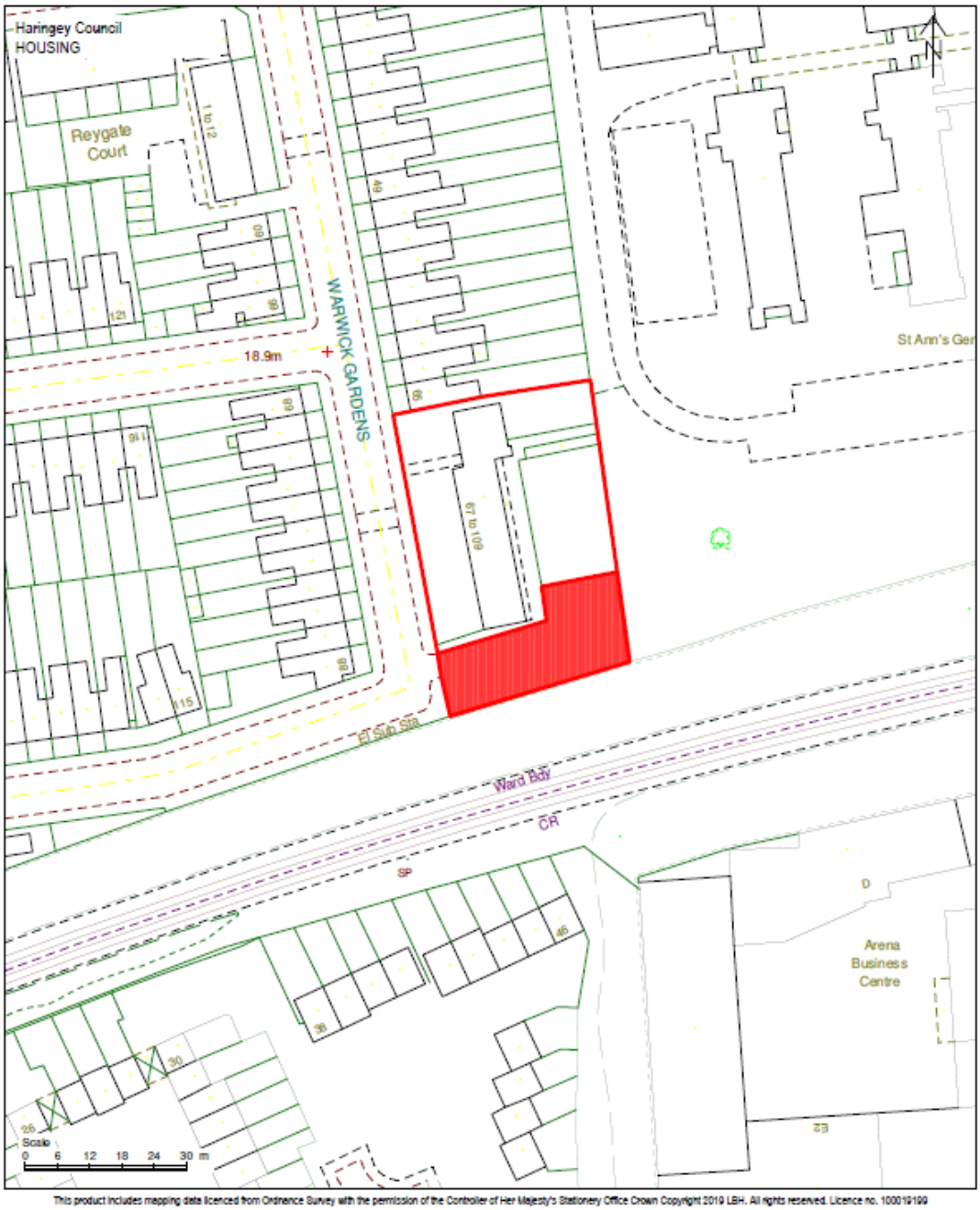
Plot C Typical Floor Plan

Appendix 2 – Warwick Gardens 'South-West link' easement plan and proposed improvement works

South-West link – extent of easement shown in blue, red line detailing the broader St Ann's Hospital site:



LB Haringey – Warwick Gardens estate (HRA) – proposed easement and extent of improvement works highlighted red:



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Warwick Gardens – parking layout and landscaping works, to be undertaken by the developer:



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Report for: Cabinet, 6th February 2024

Title:	Appointment of Commercial Property Management Provider for 40 Cumberland Road
Report authorised by:	David Joyce, Director for Placemaking and Housing
Lead Officers:	Sarah Lavery, Pippa Gueterbock
Ward(s) affected:	Woodside, Noel Park
Report for Key/ Non Key Decision:	Key Decision

1. Describe the issue under consideration

1.1. To approve the appointment of a specialist commercial property management services supplier for 40 Cumberland Road ("Wood Green Enterprise Hub") for a period of three years, with options to extend by a year, and a subsequent option to extend by a further year, as an interim measure which will enable the Council to develop its capacity to self-deliver workspace.

1.2. During this contract, the Council will seek to build capacity within the Property Team to manage multi-let commercial properties such as this (with multiple occupiers and meeting and event space) with a view to providing such services at 40 Cumberland Road after the contract term with the third-party commercial property management services supplier ends, and potentially at other sites across the borough.

2. Cabinet Member introduction

2.1. Delivering the Wood Green Enterprise Hub project at 40 Cumberland Road presents a unique opportunity for the Council to support local businesses and enterprises through the creation of workspace. Support such as this is especially important in challenging economic times, such as the period we currently find ourselves in.

2.2. Wood Green has a thriving economy of creative enterprises and entrepreneurs, and as such there is increasing demand for workspace to support local SMEs, as well as provide opportunities for growth. The Enterprise Hub will not only protect the existing 3rd and 4th floor occupiers in the building and provide space for new occupiers, but also transform an underutilised building into a hub for local people to access events, culture and networks.

2.3. The Enterprise Hub will enable the council to demonstrate its commitment to the delivery of workspace for local businesses through its own property by leveraging external funding, and in doing so secure social value outcomes for the people and businesses of Wood Green, now and in the future. It will also

enable the Council to develop an innovative self-delivery approach for future workspace across the borough.

3. Recommendations

3.1. Cabinet agrees to approve the Authority entering into a services contract with a third-party supplier to provide commercial property management services for 40 Cumberland Road for an initial period of three years, with options for extension to a total duration of up to five years from the commencement of the contract.

4. Reasons for decision

4.1. It is a longer-term ambition of the Council to build its capability to successfully manage modern "workspace" environments on Council properties (such as 40 Cumberland Road) in a self-sufficient manner which maximises the property's local impact and benefits. The Council does not currently have this capability. As such, it is proposed that the Council will appoint a suitably skilled and experienced commercial property management services supplier to manage 40 Cumberland Road over an interim period whilst the Council seeks to build its own internal capabilities in this area.

4.2. This approach is in line with 'Opportunity Haringey' which was adopted at Cabinet in November 2023. Opportunity Haringey is Haringey Council's new inclusive economy framework. The Opportunity Haringey vision is to create a fairer and greener local economy that builds on local creativity to harness Haringey's strengths. It has been developed through listening to residents and businesses. It sets out how the council will work with local and strategic partners to create an inclusive, more resilient local economy where local businesses can grow and thrive and residents benefit from rewarding, well-paid work. The framework has five themes, one of which is 'Work Places and Spaces'; with which this project aligns.

4.3. It is proposed that the commercial property management services supplier is engaged for an initial three-year period, which will allow 40 Cumberland Road to become fully operational and develop a community of occupiers across the property, before a process takes place for handing over the management of the property to the Council's in-house team which will manage this property and potentially other Council commercial properties across the borough. There will be the option to extend to the contract with the supplier for a fourth year, and a subsequent option to extend the contract with the supplier for a fifth year, should it be deemed beneficial. The contract will therefore have a maximum term of five years

4.4. The successful supplier was selected following an open procurement process, managed by the Council's strategic Procurement team, which concluded on 18th December 2023. As well as written submissions, tenderers were also scored on clarification presentations, given to the evaluation panel. The panel was made up of officers from Property, Regeneration and Economic Development team.

4.5. The procurement tender pack included a fully drafted services contract, so as to ensure that bidders were aware of the legal / contractual requirements. Changes to the contract can be made only via the change control process outlined within the contract, and only once it has been entered into by both parties (successful supplier and Council).

4.6. Should the outlined approach be successful, it could provide a model that could be replicated in other Council commercial properties to activate and optimise vacant sites and inform wider property strategy.

4.7. The commercial property management services at 40 Cumberland Road will include several statutory and legal duties in addition to supporting the occupier community and delivery of social value outcomes. The commercial property management services supplier will be responsible for a number of activities such as planned and preventative maintenance of the building, collecting of occupier fees such as service charge and licence fees, and ensuring compliance in matters such as fire safety, health and safety, maintaining appropriate insurance etc.

4.8. The Council has external capital grant funding available which will enable the fit-out improvements of 40 Cumberland Road to provide an exciting new workspace environment. The Commercial property management services supplier will support this process. They will feed into the design and delivery process, support existing occupiers and work on pre-letting and management plans to ensure a swift transition to operation following completion of construction.

4.9. Existing occupiers of the third and fourth floors entered new license to occupy agreements in August 2023. They will be impacted by the change in management arrangements. However, it is anticipated that this will be a positive change, with a dedicated organisation in place to contact to discuss issues, faster response times to repairs and a clear understanding of the operation of the building. This change will be managed through sustained engagement with these stakeholders and nurturing the relationship between the commercial property management services supplier and the occupiers. A high-level overview of the new approach and upcoming changes have been communicated to the occupiers, with more detail to be provided as and when approvals are granted.

4.10. The officer recommendations set out in the report take into consideration the below factors:

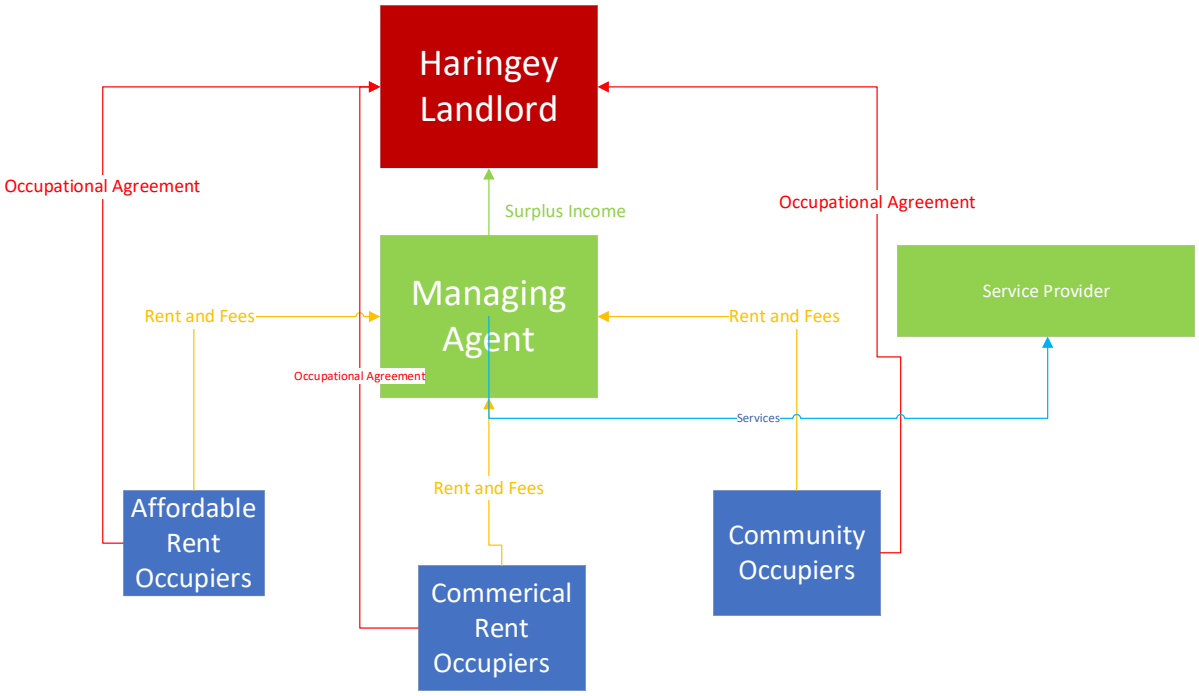
- the time required to build an in-house workspace management team

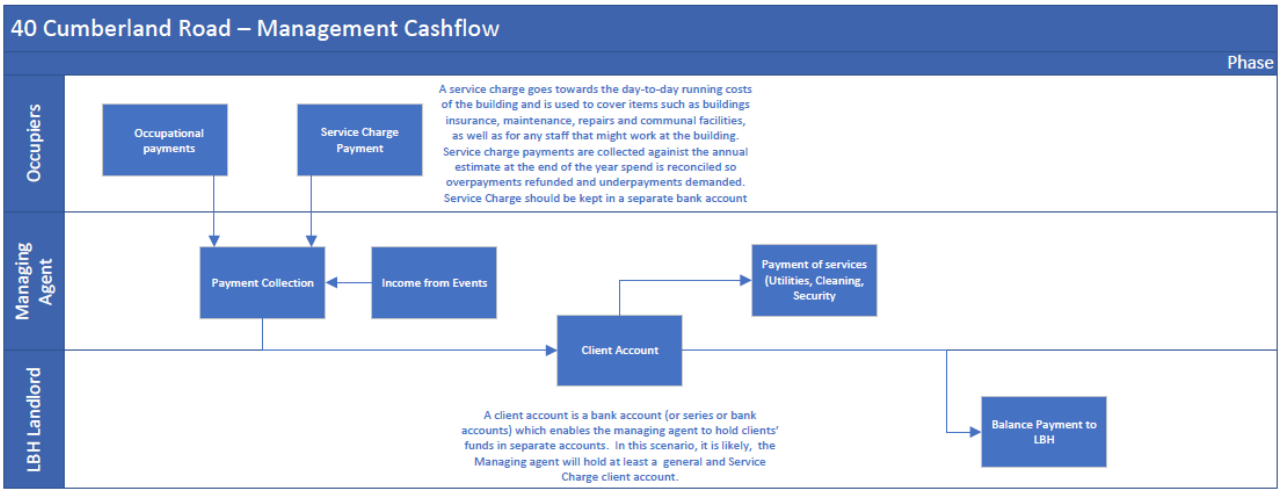
- the opportunity for learnings that can be obtained through contracting with an expert commercial property management services supplier.

This approach will seek to reduce delivery risk to the Council as it assumes an intelligent client role. Alternative options are explored further in Section 5.

4.11. The Council will maintain a direct legal relationship with existing occupiers, via occupation agreements (licences and leases). The revenue from occupier fees is intended to cover the costs of commercial property management services and third-party service provider costs (that the commercial property management

services supplier would source), e.g. for facilities management related costs. All surpluses would then be retained by the Council. The Council will have a clear, detailed services contract with the supplier.





4.12. The deliverables of the contract with the commercial property management services supplier will include (but are not limited to):

a. Property management plan;

b. Planned and preventative maintenance plan;

c. Health and safety compliance plan;

d. Marketing and letting plan;

e. Financial plan;

f. Progress reports;

g. Executed occupational agreements;

h. Systems and set up of software to provide the services;

i. Finance transferred to the authority;

j. Handover plan; and,

k. Third party service providers agreements and invoices.

4.13. The scope of activities of the commercial property management services supplier includes (but are not limited to):

a. **Occupier management** – day-to-day management of occupiers including: develop and deliver a robust property management plan; develop and deliver a marketing and sales plan; on-site presence; lead processes with occupiers and facilitate legal occupational agreements; coordinate occupier meetings; curate the customer mix to benefit the building and local area; communicate with occupiers and be their main point of contact.

b. **Financial management and reporting** – Develop and perform against an annual and five-year plan; income collection; debt and arrears management; efficient management of third-party services & invoice settlement; provide performance reports / open book accounting and meet with LBOH (leading key performance indicators will relate to compliance monitoring, occupier feedback, income and occupation rates).

c. **Facilities management** – Contracting with, managing and paying utility and facilities suppliers; soft and hard facilities management; event and meeting room management.

d. **Animation of the property** – Facilitating networking and encouraging collaboration between occupiers and other local organisations; ongoing provision of studios for creative micro businesses on upper two floors, enabling creative anchor tenant Alexandra Palace to utilise the ground floor, facilitating business support; enable providers of social value to carry out activities at the property such as events, workshops etc.

e. **Handover to the Council** – Working with the Council to develop its in-house capability to support future management of this and other similar properties during the contract term, and handing over management of the building at the end of the contract term

4.14. In advance of the tender being formally issued in December, a market warming exercise took place in early September for the commercial property management services contract, resulting in interest being expressed from several

organisations. This exercise included providing information to interested parties to register on the Council's procurement framework.

4.15. Major Projects are manging the design and fit out works for 40 Cumberland Road. These works are jointly clienteed by the Wood Green Regeneration and Property teams. The design team is being managed by architects Assemble and QS services are being provided by IKS. The fit-out contractor is yet to be commissioned but Major Projects have added approval of the successful contractor to the cabinet forward plan for spring 2024.

5. Alternative options considered

5.1. Officers considered the following alternative options to manage 40 Cumberland Road and achieve the ambitions for the property as set out:

5.2 **Council Direct Delivery of Whole Site in 2024**

The Council currently provides facilities management and wider property management to 40 Cumberland Road, which mainly involves managing the upper two floors of occupiers, and provision of repairs, cleaning, maintenance and security. While deliverable, it is resource intensive. The level of resource required will only increase as the building is developed into a fully functioning workspace environment. It is unlikely that LBH would be in a position to mobilise a full team on the opening of the Enterprise Hub, due to timescales and challenges associated with within the property profession. Failure to deliver within the time constraints or meet service level requirements would have a repercussions on the financial return that the Council can expect.

5.3 **Council Manages Occupiers and Appoints External FM Management**

This option would involve a split of responsibilities between the Council, who would manage occupiers; and a third-party supplier who would undertake facilities maintenance duties under a services contract. The time to implement the services contract would be similar to the Property Management Services Contract due to legal and procurement rules. In this case, the Council would need to be highly diligent as client, as the management of the property and the facilities would be separated. This would cause complexities including an impact on the occupier experience, higher level of Council resource required to manage the site, and risks around communication and the loss of synergy and economies of scale in delivery. Overall, the cost of delivering Property Management directly and facilities management via a supplier is likely to reduce the financial return.

5.4 **Do Nothing**

The responsibilities associated with property ownership mean that not providing services to the building is not an option. The Council has statutory and legal responsibilities to ensure that the building is safe and being used appropriately. The longer-term cost of implementing occupational agreements and not providing services or management will be significant reducing the overall return.

6. Background information

6.1. The ambition for 40 Cumberland Road (also referred to in this paper as the "Wood Green Enterprise Hub") is to deliver on several Council objectives. For instance it will:

a. create new opportunities for the people and businesses of Wood Green;

b. activate an underused Council asset;

c. generate new economic activity;

d. diversify the town centre;

e. provide the Council with an income stream.

6.2. Parts of 40 Cumberland Road (GF – 2nd Floor) were previously used to accommodate Council officers, who are now accommodated elsewhere. These floors are now vacant.

6.3. In January 2022 a previously adopted approach was approved at Cabinet. This approach involved competitive selection of a supplier to manage 40 Cumberland Road under a lease and service level agreement. A preferred supplier was identified, but they withdrew due to concerns over the financial viability of their proposals in a changing economy. On the basis of this withdrawal, an options analysis was undertaken as set out in section 5 which identified that the preferred option is "Self-operate as LBH", either via building a team within the Council or procuring the services of an operator building an in-house team to manage commercial properties such as this. A paper was taken to CPSG board in April 2023 which approved this preferred approach.

6.4. Conclusion of Procurement Process

Supplier	Price	Quality	Final Score	Rank
Supplier A	40	45	85	1st
Supplier B	35	27	62	2nd

The comprehensive evaluation process concluded that Supplier A was ranked first and able to meet all the Council's requirements.

6.5. Risks relating to the commercial property services contract include:

Risk Area	Description	Mitigation Actions
New way of working	This is a new way of working for the Council,	Approaches have been identified and will be developed to successfully

	which will create challenges	manage this new way work of working
Supplier underperforms	The supplier might fail to achieve the Council's targets for the contract	Have clear performance indicators in the contract and suitable clauses to manage under delivery
Agility in entering contracts	To optimise occupancy rates and speed of mobilising third party service providers, a faster than normal process would be required for the Council.	Seek time efficiency where possible including use of digital signatures, credit check agencies and contract templates to minimise legal time required.
Demand	Market demand from small businesses is currently high for small units, but that could change over the coming years, reducing the surplus generated from the property.	Monitor market activity and respond accordingly.

6.6. The commercial property management services contract will enable a contribution to be made to the following:

Corporate Delivery Plan 2022-2024 – High level strategic outcomes including:

a. Place – Improving opportunities for co-production, embedding the property within local networks, and diversifying the local area through introduction of innovative new uses.

b. Good Economy – Supporting Good Economy principles, such as through the creation of training opportunities, business support provision, and employment and skills opportunities in key sectors for local micro businesses and people.

c. Community Wealth Building – Encouraging community wealth building and invest locally, through methods such as localised supply chains and procurement.

d. Financial Sustainability – Supporting the property to create no ongoing net loss to the council and ideally surplus generating.

The Councils' Commitment to achieving Net Zero by 2041

a. Mitigating Carbon - In line with central government policy which makes it unlawful for landlords to grant new leases and licences on commercial premises if the Energy Performance Certificate (EPC) rating is below an E, the energy efficiency of the building will be improved as part of the refurbishment. From 2027 commercial buildings will be required to deliver a

standard of building with an EPC level of C. Therefore, this is the level that will be targeted.

b. Mitigating Carbon – Travel Emissions **-** creating a workspace in the town centre which caters to local people will contribute to reduction of Travel emissions, by giving residents access to a site which they can easily commute to on foot or by bicycle, rather than by car. To discourage unnecessary car journeys, the site will not offer dedicated parking (blue badge parking and loading bays are available on the street). The ground floor car park will instead be reutilised as a space to deliver events. Bicycle parking will be provided.

Shaping Wood Green Strategic Engagement Outcomes

In line with the approach to engagement set out in the 2022-2026 Labour manifesto, the 'Wood Green Voices' strategic programme of engagement was delivered in Wood Green town centre in late 2022. It aimed to engage with local residents and stakeholders in a new, truly collaborative way; reaching those who are often excluded from such processes. The feedback received was collated and divided into six themes and presented in the Shaping Wood Green vision document, which was launched at a community event in July 2023. The commercial property management services contract will enable delivery on several priorities within three of the six themes as follows:

a. Culture at the Heart of Wood Green **–** Continued provision of lower cost space for local creatives and creative micro businesses on the third and fourth floors of 40 Cumberland Road will enable the current activities to continue and grow, helping to cement Wood Green as an attractive location for this sector in a time where artists and creatives are increasingly priced out of studios in previously affordable areas. Provision of space for cultural anchor tenants such as Alexandra Palace, who wish to take space within the property to expand their work with young people, and deliver seasonal theatre pop up activities will connect new cohorts of local people with Alexandra Palaces' ongoing work and work in tandem with the creative studio space to establish the property as a focal point of various different types of cultural activity.

b. North London's Town Centre for All **–** The commercial property management services is anticipated to help the property diversify the Wood Green town centre, creating exciting and innovative new opportunities for local people and bringing new activity and animation to a currently underused site. Working in tandem with other local multi-occupied properties such as Blue House Yard and Clockwise Workspace has potential to transform Station Road from a secluded back street into a thriving enterprise zone. Provision of commercial space for local businesses is an essential part of a thriving town centre. The Council wants to provide such space to ensure that businesses are able to start, grow, and be retained in the local area; creating much needed local jobs.

c. An Economy to Benefit Everyone **–** Strategic reuse of Council properties such as 40 Cumberland Road for uses other than as Council offices can deliver a

plethora of benefits for the local area. Ongoing collaboration with anchor organisations such as Alexandra Palace will strengthen the Council's inward investment approach.

7. Statutory Officers comments

7.1. Finance Comments

Finance Comments are contained in Exempt Part B

7.2. Strategic Procurement Comments

Strategic Procurement have been consulted in the preparation of this report.

An open tender process in compliance with CSO 9.01.2a) has been undertaken and lead by Strategic Procurement.

CSO 9.07.1d permits the Cabinet to award all contracts valued at £500,000 or more at the time of award.

Strategic Procurement support the recommendations in Section 3 of this report

7.3. Legal Comments

The Head of Legal and Governance (Monitoring Officer) has been consulted in the preparation of this report.

Pursuant to Contract Standing Order 9.07.1(d)) Cabinet has authority to approve the recommendations in the Report.

The Head of Legal and Governance (Monitoring Officer) sees no legal reasons preventing Cabinet from approving the recommendations in the report.

7.4. Equalities Comments

The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- eliminate discrimination, harassment and victimisation and any other conduct prohibited under the act.
- advance equality of opportunity between people who share those protected characteristics and people who do not.
- foster good relations between people who share those characteristics and people who do not.

the three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex, and sexual orientation. Marriage and civil partnership status apply to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

Procuring commercial property management services is expected to benefit residents in line with Opportunity Haringey's inclusive economy strategy and the Good Economy Recovery Action Plan, which describes the Council's objectives regarding bringing social and economic benefits to residents, including those with protected characteristics. As a result, this decision may have indirect positive impacts on equality, but the decision itself is likely to have a neutral impact. Additionally, it should be noted that this decision will have no known negative impacts on those who share the protected characteristics.

As an organisation carrying out a public function on behalf of a public body, the chosen supplier will be obliged to have due regard for the need to achieve the three aims of the Public Sector Equality Duty as stated above.

8. Use of Appendices[1]

8.1. Exempt report in Part B of the agenda

9. Local Government (Access to Information) Act 1985

[1] Must be sent to Democratic services with report for publication.There is a requirement to publish information on the internet and intranet sites.

Categories of Exemption

Exempt information means information falling within the following categories:

Part 1

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 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 upon 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.

Part 2

Qualifications to the above exempt information:

(a) Information falling within paragraph 3 above is not exempt information under that paragraph if it is required under – (a) the Companies Act 1985 (b) the Friendly Societies Act 1974 (c) The Friendly Societies Act 1992 (d) The Industrial and Provident Societies Acts 1965 – 1978 (e) the Building Societies Act 1986 (f) The Charities Act 1993.

(b) Information is not exempt information if it relates to proposed development for which the local planning authority may grant itself planning permission pursuant to regulation 3 of the Town and Country Planning General Regulations 1992.

(c) Information which – (i) falls within any of paragraphs 1-7 above; and (ii) is not prevented from being exempt under (a) or (b) above is exempt information if an so long as, in the opinion of the Monitoring Officer, in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

Report for: 6 February 2024

Title: Haringey Safety Valve Programme: SEND Resource Provision

Report authorised by: Ann Graham, Director: Childrens Services

Lead Officer: Caroline Brain, Assistant Director: CYP Commissioning & Programmes, Jackie Difolco, Assistant Director: Early Help, Prevention and SEND

Ward(s) affected: All
Report for Key Decision:

1. **Describe the issue under consideration.**

1.1 Haringey Children Service's Team have secured £7m of DfE Capital funding alongside £5.4m from the High Needs Capital grant funding and local authority contributions, to develop education provision for children and young people with special education needs and disabilities (SEND) as part of the Safety Valve Programme. This paper focuses on the capital proposals for the Safety Valve programme which were approved in principle by cabinet - refer to background paper (Safety Valve Programme Cabinet Paper 13th of September 2022).

1.2 This paper is seeking cabinet approval for the creation of six separate resource provisions to create **118** additional school age, and post 16 education places in borough for children and young people with SEND, with social emotional and mental health (SEMH), autism spectrum condition (ASC), and severe learning difficulties. These provisions will be delivered within the Safety Valve Programme funding envelope of **£12.4m.**

1.3 Two of the six provisions, Earlsmead Primary School and Riverside Secondary School have already been submitted for directors' approval under delegated authority but will remain in this report for transparency purposes. These two schemes will also feature in the exempt appendix which contains indicative costings and programme fees for all six schemes outlined in section 3.

1.4 Each provision will require a service level agreement between the local authority (lead) and the education setting where the provision is being established. This will set out the terms of and conditions of the funding arrangements for pupil placements and that the sole use of the provision is for those children identified through Haringey's SEND panel.

2. Cabinet Member Introduction

2.1 The DfE have asked Haringey to apply to become part of the 2022/23 Safety Valve Programme which is designed to assist local authorities in reducing overspends in their High Needs Block expenditure – the central government funding provided for

SEND. Currently Haringey is predicted to have a significant overspend in SEND by 2027/28, which, if left unchecked, could seriously undermine council finances. The government offer, whereby historic deficits could be eliminated, is predicated on LBH developing a series of detailed plans for systemic change, and service transformation.

2.2 This is a challenge for the Service, and one which I believe we can meet as we are already engaged on that change process of wider strategic transformation of SEND Services in Haringey. This process, underpinned currently by our Written Statement of Action is underway, in partnership with our key stakeholders in our schools, the wider education, health and care sectors, children, young people, and their families.

2.3 These capital projects provide a vital springboard for systemic changes and service transformation which is hugely welcome. The new facilities will promote bespoke provision for children with SEND close to home and contribute to more extensive and longer-term change whereby SEND resources will be prioritised for early intervention, and support; and where changes as to how and where SEND services are provided are linked to our wider education strategy.

3. Recommendations

3.1 For cabinet to approve the creation of six new SEND resource provisions (see table one below), as agreed in the original cabinet paper for the bid to the Department for Education (DfE). These form the main part of the capital projects within Haringey's Safety Valve Programme, each provision will be delivered within the financial funding envelope of **£12.4m.**

Table One: Resource Provisions to be Approved.

Provision	Number of places	Start date for pupils (phasing)	End date for places to be filled
Primary SEMH Alexandra Primary School	**10**	Sept – 2025	Sept – 26/27
Primary Autism School (A) Earlsmead School	**15**	Sept – 2025	Sept – 27/28
Secondary and Post 16 Autism Fortismere Secondary School	**34**	Sept – 2025	Sept – 27/28
Secondary and post 16 SEMH Park View Secondary school	**34**	Sept – 2025	Sept – 27/28
Severe Learning Difficulties The Brook Primary Special School	**10**	Sept – 2025	Sept – 26/27
Secondary and Post 16 Complex Needs Placements Riverside School	**15**	Sept – 2025	Sept – 26/27
Number of placements	**118**		

For further background information please refer to the Safety Valve Paper submitted to cabinet in in September 2022 (see Appendix C).

3.3 Alternative options considered.

3.4 Do Nothing – This option was discounted, the cumulative DSG deficit as of 31st March 2023, was **£23.83m,** is continuing to increase and is unsustainable. If unmitigated, this is predicted to increase to **£77.6m** by 2027/28.

4. Background information

4.1 Haringey Council became part of the (DfE) Safety Valve Programme in March 2023. Haringey has agreed a Safety Valve deal until 2027-2028, with 18 projects, across three workstreams (demand management, commissioning, culture, governance, and leadership).

4.6 The Safety Valve programme identifies three key workstreams. This report focuses on the capital developments within Workstream B (Capital and Commissioning) and delivery of education support for children with education, health, and care plans.

4.2 Each of the provisions described above are in alignment with the plans submitted to the Safety Valve Programme. They will contribute to Haringey's proposals to make in excess of £50m of savings over 5 years. In total, these schemes will contribute savings of £9.3m between September 2025 and the end of the financial year end 2027/2028 and deliver a balanced budget thereafter (background paper).

5. Report

<u>Key Programme developments</u>

5.1 In February 2023 Children's Services created an open and transparent expression of interest process, inviting applications both primary and secondary schools across the borough to place bids for the capital investment allocated as part of the Safety Valve Programme to run SEND resource provisions.

5.2 To ensure this ran smoothly a period of intensive stakeholder engagement took place, including workshops and drop-in surgeries throughout March 2023, inviting schools to engage, challenge and request further information on the project. Once completed the application process was opened and safety valve engagement documents were shared to assist in the bid writing process for those schools that wished to apply.

5.3 By the end of March 2023, the project team received several expressions of interest (EOI) from both primary and secondary schools. The project team then mobilised a moderation group comprising of independent representatives from our local Integrated Care Board, parent, and carer representatives from SENDPower, and colleagues from Haringey's Capital Projects and Property team. The team then assessed each application with the below scoring criteria:

a) school Ofsted rating being either Good or above.
b) local infrastructure and School Transport parking arrangements
c) the school's vision to provide SEND services.
d) vision for its joint development of a SEND based curriculum with Haringey Education Partnership.
e) financial profiling and sustainability of placements.
f) staffing structure and teacher to student ratio.
g) school inclusivity.

5.4 Following the moderation, the team selected the most appropriate schools based upon the needs of children in the borough, the ability to deliver a high-quality curriculum and each school's financial sustainability proforma being assessed.

5.5 Once assessed the project team visited each of the school sites to assess their viability, space allocation in accordance with SEND guidance as set out by the DfE. The team also gained the input from an independent architectural specialist to review that each site was deemed suitable for the programme, and where necessary, obtaining pre- desktop feasibility assessments. However, the risk remains that any given school may decide to remove itself from the scheme.

5.6 To ensure that schools remain updated and aware of the direction of travel for the project, the Programme and Commissioning Team, Capital Projects Property Team, and Finance Team, have all worked across departmental barriers with a collaborative approach on the preparation for each of the schemes. During the school selection process, the team began creating and implementing the necessary programme structures to ensure the successful delivery of the capital element of the Safety Valve Programme which included setting up project documentation, governance, and accountability processes.

5.7 There is an overall Capital Board for all Children's Capital Programmes chaired by the Director of Children's Services, with a subgroup responsible for implementing the Safety Valve Capital Projects, chaired by the Assistant Director for Early Help, Prevention and SEND who is the Programme Sponsor for the Safety Valve Programme.

5.8 As the programme continues to develop the team are working to set up specific sub-groups for each SEND provision. These subgroups will consist of multidisciplinary teams, with educational support, workforce development and an emphasis on strengthening the SEND curriculum, as well as keeping key stakeholders aware of the progress against each of the capital builds which will be tailored to each respective provision.

5.9 Another component of each workstream will be for Haringey's Commissioning Team to lead on the drafting and implementation of a service level agreement/contract between local authority (lead) and each of the schools outlining the required performance standards and responsibilities expected, for a time bound period to protect the council's investment.

5.10 Placements for each provision will be matched dependent upon the student's ECHP plan and a profile matching process to ensure that each placement provides

excellent outcomes for the students. This placements will be channelled through the SEND panel which is currently set up and overseen by the Head of SEND. This comprises a multidisciplinary team from a range of system partners. Progress on each of the schemes to date can be found in the Safety Valve Monthly Programme Update in appendix C: Safety Valve Programme Update.

6. Contribution to the Corporate Delivery Plan 2022-2024 High level Strategic outcomes

6.1 The objectives of the Safety Valve programme are aligned with the priorities within Haringey's Corporate Delivery Plan 2023-2024' specifically:

Theme 3: Children and young people

- Outcome 1: Best Start in Life – The first few years of every child's life will give them the long-term foundation to thrive.
- Outcome 2 Happy Childhoods - All children across the borough will be happy and healthy as they grow up, feeling safe and secure in their family networks and communities.
- Outcome 3 Successful Futures - Every young person, whatever their background, has a pathway to success for the future.

6.2 This work contributes to Haringey's SEND Strategy 2022- 2025, which contains 5 priorities, of which Priority One and Priority Two respectively, identifies the need to support children at the earliest opportunity to access the intervention they need to achieve and thrive and 'Wherever possible, we will meet the needs of Haringey's children within Haringey'. This also links to priority two within Haringey Early Years Strategy 2022 - 2026: Every child should be able to have access to the high-quality inclusive provision that is tailored to their needs'.

7. Carbon and Climate Change

7.1 The Council has set the date for a zero-carbon deadline of 2027, including core council operational buildings and all transport-related activities undertaken by the Council in the delivery of core services. The rest of the buildings from which the Council delivers services and is directly responsible for the energy bills (such as schools) will be net zero carbon as soon as it is possible the same will also apply to the resource provisions outlined in this cabinet report.

7.2 The council will continue to aim to reduce its overall energy consumption and will monitor its environmental performance, with attempt to reduce revenue spend on energy. Key partners which are required to deliver this vision include providers of currently outsourced services and other members of the council's external supply chain.

8. Statutory Officers comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

Finance

8.1 The recommendation of the report is to develop new SEND provision within 6 schools as set out in section three, creating 118 new places for children with SEND. The creation of each unit will have varying capital costs as indicated in the exempt report. The exempt report also itemises other costs associated with the delivery of capital schemes such as project management fees, surveys etc. It is currently anticipated that the construction costs plus the other costs associated with delivery will be contained within the overall budget allocation of £12.4m within the approved General Fund capital programme. Currently the budget profile is as set out below:

		2023/24 Budget	2024/25 Budget	2025/26 Budget	Total
SCHEME REF	**SCHEME NAME**	**£,000**	**£,000**	**£,000**	**£,000**
125	Safety Valve	**500**	8,661	3,250	12,411

Procurement

8.2 Strategic Procurement has been consulted in the preparation of this report, and will support commissioning teams with the procurement of suitable economic operators to deliver the capital build projects to increase SEND provision as outlined in section 3 above as set out in recommendations, in accordance with the Public Contract Regulations and Contract Standing Orders

Head of Legal & Governance

8.3 The Head of Legal and Governance (Monitoring Officer) has been consulted in drafting the report. Pursuant to Contract Standing Order 9.07.1(d) Cabinet has the power to approve the recommendations in the report. The Head of Legal and Governance (Monitoring Officer) sees no legal reasons preventing Cabinet from approving the recommendations in the report.

Equality

8.4 The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act,
- advance equality of opportunity between people who share protected characteristics and people who do not,
- foster good relations between people who share those characteristics and people do not.

8.5 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex, and sexual orientation. The first part of the duty applies to marriage and civil partnership status only. Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

8.6 The proposed decision to approve the development of six educational resource provisions will affect:

a) all children and young people with SEND
b) schools and early years settings in Haringey

8.7 Accordingly, these provisions will positively affect the following groups who have protected characteristics: children and young people and children and young people with SEND. The data show that boys and those from Black African, British, or Caribbean backgrounds are overrepresented in the SEND population. Additionally, there is a higher proportion of children with EHCPs in areas with high levels of deprivation.

8.8 The objective of the proposed decision is to improve the Council's policies and processes in relation to the provision of education for children with SEND within the borough.

8.9 This will lead to better access, early intervention and support for children, young people with special education needs and disabilities – including those with protected characteristics who are overrepresented in the SEND population – helping address issues raised in relation to inequity of education provision across the Borough. The provisions will provide a new operating model where children will be in mainstream schools supported by a bespoke curriculum as and where needed tailored to their SEND needs. The provision also provides children with additional access to therapy rooms and sensory rooms with areas built fit for purpose locally. The pupils will be taught where their peers which will remove the stigma of out of borough placements in specialist schools.

8.10 The Council will take steps to collect demographic data on service users to identify any inequalities in service provision that may arise and to inform future equalities analysis.

8.11 The Equality Impact Assessment is provided in Appendix A of this report, outlining more information on equalities impacts.

9. **Use of Appendices**

Appendix A: Contains the Equality Impact Assessment

Appendix B: Exempt Information

Appendix C: Safety Valve Programme Cabinet Paper 13th of September 2022

Further supplementary information regarding the Safety Valve Programme Update can be viewed on the council's website. A hyperlink is provided here to the web page -> here.

Equality Impact Assessment (EQIA)

Name of proposal:	**Haringey Safety Valve Programme: SEND Resource Provision's**
Service Area:	**SEND**
Officer Completing Assessment:	**Andrew Ratcliffe**
Equalities Advisor:	**Vlada Shevelkova**
Cabinet meeting date:	**6th February 2024**
Director/Assistant Director:	**Jackie Difolco**

2. Executive summary

The Department for Education (DfE) commenced the Safety Valve intervention programme agreed in 2021, to support the local authorities that have the highest Dedicated Schools Grant (DSG) overspends. The Safety Valve programme supports local authorities to develop and agree to substantial plans for reforming their high needs budget to fully meet SEND service requirements and place them onto a more sustainable footing. Haringey Council receives approximately £215.7m in DSG for maintained schools.

The DSG is spilt into 4 blocks:

Block 1 - Schools

Block 2 - High Needs

Block 3 - Early Years

Block 4 - Central School Services

Haringey Council became part of the (DfE) Safety Valve Programme from March 2022 The DSG deficit was significant at £23.83m as at 31st of March 2023. The deficit continues to increase and is unsustainable, predicted to be £78m 2027-2028.

Haringey Council has agreed a Safety Valve deal until 2027-2028, with 18 projects, across three workstreams. If successfully delivered, these projects will improve outcomes for children and young people with SEND and draw down funding of £30m to clear the projected deficit to achieve an in year balanced budget by 2027-28. Of the 18 projects, six of these are to build education resource provision. The Haringey Children Service's Team have secured £7m of DfE capital, to develop education provision for children and young people with special educational needs and disabilities (SEND) as part of the Safety Valve Programme in addition to £5.4m of council and high needs capital funding. This paper focuses on Equality Impact Assessment requirements, which are addressed through the capital proposals for the Safety Valve programme.

The Safety Valve programme identifies three key workstreams: Demand Management (Workstream A) Commissioning (Workstream B), and Culture, Governance and Leadership (Workstream C). This EQIA focuses on the capital developments within Workstream B and delivery of education support for children with education, health, and care plans (EHCPs). The proposal is for the creation of six separate resource provisions to create 118 places in borough for children and young people, who are assigned support with their social emotional and mental health (SEMH), autism (ASC) and other complex needs. The provisions will be delivered within the Safety Valve Programme funding envelope of £12.4m.

In addition to this EQIA, which is directly related to the SEND capital resource provisions, additional EQIAs will be completed for both workstream A and C for the programme.

3. Consultation and engagement

In February 2023, Children services implemented an open and transparent expression of interest process, inviting applications for both primary and secondary schools across the borough to place bids for capital

investment allocated as part of the Safety Valve Programme. The capital investment is to support and run SEND resource provisions. Through March 2023, a further consultation process has taken place with stakeholder engagement which included workshops and drop-in surgeries inviting schools to engage, challenge and request further information on the project. Upon completion the application process was opened, and documents were shared, to assist in the bid writing process for those schools that wished to apply.

At the end of March 2023, the project team received several expressions of interest (EOI). A moderation panel was created, comprising of independent representatives from our local Integrated Care Board, together with parent and carer representatives from SENDPower. Colleagues from property, SEND, and representatives from schools and learning were also part of this panel. The panel assessed each application, looking at a range of measures and criteria to ensure that the appropriate schools were chosen objectively. These criteria included:

a) school Ofsted rating being either Good or above

b) local infrastructure and parking arrangements

c) the school's vision to provide SEND services

d) vision for its joint development of a SEND based curriculum with Haringey Education Partnership

e) financial profiling and sustainability of placements

f) staffing structure and teach to student ratio which was to be determined based on the number of children in the provision.

g) school inclusivity.

Following assessment, the moderation panel produced recommendations of which primary and secondary site schemes were assigned for capital builds. However, this still left a gap in terms of resource provision for secondary SEMH.

School selection

The following section provides a summary of the reasons and any considerations for each school selected.

Each school has been assessed against DfE BB104 technical SEND spacing guidelines, to ensure that any new resource provision can meet the needs of children with ASC and SEMH appropriately. The council is working with a range of schools across the borough, to meet a range of SEND needs, especially in areas of deprivation.

3a. How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff? Detail how your approach will facilitate the inclusion of protected groups likely to be impacted by the decision.

The consultation has been an ongoing process since the outset of the programme. The programme team first set-ups a range of engagement forums in the form of engagement sessions with schools, spread out over set days, with the times being staggered to meet the needs of Head teachers and co-workers. There were also mop-up sessions and drop-in surgeries organised so those who were unable to attend had several opportunities to engage with the programme team.

In addition to this the programme team set-up a moderating panel to assess all the bids received for the resource provisions, this involved colleagues form the Integrated Care Board, parent and carer representatives from SENDPower. Colleagues from property, SEND, and representatives from schools and learning were also part of this panel. The panel assessed each bid, looking at a range of measures and criteria, including school inclusivity, to ensure that the appropriate schools were chosen objectively.

3b. Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics.

As the capital builds take place for the resource provisions, sub-groups have and continue to be set-up as each of the projects begin to progress into the RIBA stages which are a plan of work which organises the process of briefing, designing, constructing and operating building projects into eight stages and explains the **stage** outcomes, core tasks and information exchanges s. Procurement tenders specified for those contractors to bid for the tenders with SEND build experience.

Further work is taking place with ICB colleagues, Whittington Health (speech and language), parent and carers' forums with the head of SEND in each of the meetings to ensure that the provisions are tailored to that needs of demographic groups and their SEND-related needs.

4. Data and Impact Analysis

Note: officers may want to complement their analysis with data from the State of the Borough and ward profiles, found here: https://www.haringey.gov.uk/local-democracy/about-council/state-of-the-borough.

Please consider how the proposed change will affect people with protected characteristics.

4a. Age

Jan 2023 School census				
Age	EHC	SEN Support	Not SEN	All pupils
1	0.0%	0.0%	0.1%	0.1%
2	0.1%	0.4%	0.7%	0.6%
3	0.4%	2.8%	3.7%	3.4%
4	3.3%	4.7%	6.5%	6.1%
5	7.3%	5.6%	7.6%	7.3%
6	7.3%	6.2%	7.4%	7.3%
7	8.5%	8.1%	7.3%	7.4%
8	7.1%	7.9%	7.1%	7.2%
9	8.6%	8.4%	7.3%	7.5%
10	9.1%	8.9%	7.2%	7.5%
11	10.3%	7.0%	6.9%	7.1%
12	8.4%	6.9%	7.2%	7.2%
13	8.0%	7.1%	7.1%	7.2%
14	8.5%	7.5%	7.2%	7.3%
15	6.8%	8.0%	7.0%	7.1%
16	3.2%	5.1%	4.8%	4.7%
17	1.9%	3.6%	3.6%	3.5%
18	1.1%	1.5%	1.2%	1.2%
19	0.2%	0.1%	0.0%	0.0%

Data

Borough Profile[1]

56,718: 0-17 (21%)
72,807: 18-34 (27%)
68,257: 35-49 (25%)
44,807: 50-64 (17%)
28,632: 65+ (11%)

Target Population Profile

[1] Source: State of the Borough

The new provision will impact those young people with SEND needs aged 5-19, who attend full time school in Haringey in with SEND needs, in either, early years setting, mainstream or special school or academy.

The policy will affect young people aged between 5-19 in full-time education in a Haringey maintained or academy school.

Potential Impacts

The creation of the resource provisions will likely have a positive impact on young people aged 5-19 in education, who have an identified Special Education Need or Disability. This new programme of work will increase the number of resource provisions available which will be specifically tailored to support children Autism and Social and Emotional Mental Health. It will also ensure that children remain in borough closer to their support networks and family units.

4b. Disability[2]

Data
Borough Profile [3]

4,500 people have a serious physical disability in Haringey.
19,500 aged 16-64 have a physical disability this equates to approximately 10% of the population aged 16-64.
1,090 people living with a learning disability in Haringey.
4,400 people have been diagnosed with severe mental illness in Haringey.

Target Population Profile

Breakdown of disability within the school age population is as follows:

Primary Need SEN type	% of pupils - Jan 2023
Not SEN	82.7%
ASD	3.2%
HI	0.4%
MLD	1.7%
MSI	0.0%
NSA	0.5%
OTH	0.8%
PD	0.3%
PMLD	0.1%
SEMH	2.5%
SLCN	4.9%
SLD	0.2%
SPLD	2.5%
VI	0.1%

The data demonstrates that Haringey has a range of children with disabilities who access mainstream and SEND schools and early years settings in Haringey. For 2023-24 Haringey request for an EHCP assessment have increased by 23%. At the end of quarter two for 2023-2024, Haringey is reporting 2,843 actual active EHCP's. Extrapolating the 2,843 to the 31st of March 2024, this shows a predicted forecast figure of 2,919 EHCP's

[2] In the Equality Act a disability means a physical or a mental condition which has a substantial and long-term impact on your ability to do normal day to day activities.
[3] Source: 2011 Census

The intention of the Safety Valve Programme is to create equalities for SEND children and young people by providing a range of support descriptors designed to meet their individual needs.

Impact

The proposed policy will have a positive impact on children and young peoples with ASC and SEMH needs life chances by ensuring that they have access to education and to the support required to enable them to achieve their outcomes.

4c. Gender Reassignment[4]

Borough Profile

There is no robust data at Borough level on our trans population, however the central government estimates that there are approximately 200,000 to 500,000 trans people in the UK. Assuming an average representation, this would mean between 800 and 2,000 Haringey residents are Trans.[5]

Target Population Profile

There are a small number of transgender young people attending Haringey Schools and some of these young people have SEND. The council does not have reliable data to support a robust reporting on the target population but will address the individual needs of transgender young people via their individual assessments.

Impact

The new framework allows for detailed consideration of the social, emotional, and mental health needs of children and young people with SEND. This policy will not disproportionately affect transgender young people.

4d. Marriage and Civil Partnership

Data

Borough Profile [6]

Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (8.2%)
In a registered same-sex civil partnership: (0.6%)
Married: (33.3%)
Separated (but still legally married or still legally in a same-sex civil partnership): (4.0%)
Single (never married or never registered a same-sex civil partnership): (50.0%)
Widowed or surviving partner from a same-sex civil partnership: (3.9%)

Target Population Profile

This policy will not affect or impact the parents of children or young people based on their marital status and we do not collect data regarding relationship status for SEND purposes.

4e. Pregnancy and Maternity

Data

Borough Profile [7]

Live Births in Haringey 2019: 3,646

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[4] Under the legal definition, a transgender person has the protected characteristic of gender reassignment if they are undergoing, have undergone, or are proposing to undergo gender reassignment. To be protected from gender reassignment discrimination, an individual does not need to have undergone any specific treatment or surgery to change from one's birth sex to ones preferred gender. This is because changing ones physiological or other gender attributes is a personal process rather than a medical one.
5 Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.

[6] Source: 2011 Census
[7] Births by Borough (ONS)

Target Population Profile

This policy will not significantly affect women who are pregnant.

Impacts

There is no reason to think that the proposed programme will impact this protected group.

4f. Race

In the Equality Act 2010, race can mean ethnic or national origins, which may or may not be the same as a person's current nationality.[8]

Data

Borough Profile [9]
Arab: **0.9%**
Any other ethnic group: 3.9%

Asian: **9.5%**
Bangladeshi: 1.7%
Chinese: 1.5%
Indian: 2.3%
Pakistani: 0.8%
Other Asian: 3.2%

Black: **18.7%**
African: 9.0%
Caribbean: 7.1%
Other Black: 2.6%

Mixed: **6.5%**
White and Asian: 1.5%
White and Black African:1.0%
White and Black Caribbean: 1.9%
Other Mixed: 2.1%

White: **60.5% in total**
English/Welsh/Scottish/Norther Irish/British: 34.7%
Irish: 2.7%
Gypsy or Irish Traveller: 0.1%
Other White: 23%

Target Population Profile

The data demonstrates that whilst there is a small rise in children in Early Years there are falling numbers of children in London.

Data regarding children under four in Haringey

2021	2022	2023	2024	2025	2026	2027

[8] Race discrimination | Equality and Human Rights Commission (equalityhumanrights.com)
[9] Source: 2011 Census

17,845	17,907	18,007	18,095	18,176	18,250	18,318

The current population analysis of children with SEND compared to school population is as follows**:**

Ethnic group (Jan 2023 school census)	EHC	SEN Support	Not SEN	All pupils
Asian - Asian British/Any Asian Background	2%	1%	2%	2%
Asian - Asian British/Bangladeshi	3%	2%	3%	2%
Asian - Asian British/Indian	1%	1%	1%	1%
Asian - Asian British/Pakistani	1%	1%	1%	1%
Black - African	19%	13%	13%	13%
Black - Black British/Caribbean	8%	7%	5%	5%
Black - Other Black	3%	3%	2%	2%
Chinese	1%	1%	1%	1%
Information Not Obtained	2%	2%	2%	2%
Mixed - Any Other Mixed Background	8%	7%	7%	7%
Mixed - White And Asian	1%	1%	2%	2%
Mixed - White And Black African	1%	2%	2%	2%
Mixed - White And Black Caribbean	4%	4%	3%	3%
Other	6%	8%	9%	8%
Refused	1%	1%	1%	1%
Travellers White - Gypsy/Roma	0%	0%	0%	0%
Travellers White - Gypsy/Roma - Other	0%	0%	0%	0%
Travellers White - Gypsy/Roma - Roma	0%	0%	0%	0%
Travellers White - Traveller of Irish Heritage	0%	0%	0%	0%
White - British	16%	22%	20%	20%
White - Irish	1%	1%	1%	1%
White - Other White	21%	24%	28%	27%

The data demonstrates that children from Black African, British, or Caribbean backgrounds are more likely to have an EHCP than other members of the school age population. A detailed piece of research and analysis is being undertaken to review the geographical and spatial socioeconomics of the borough to inform the overall impacts on these protected characteristics.

Impacts

The proposed policy will have a positive impact on children and young people with ASC and SEMH needs including from Black African, British, or Caribbean backgrounds who are overrepresented in the SEND population by ensuring that they have access to education and to the support required to enable them to achieve their outcomes.

4g. Religion or belief

Data

Borough Profile [10]
Christian: 45%
Buddhist: 1.1%
Hindu:1.9%
Jewish:3%
Muslim: 14.2%
No religion: 25.2%
Other religion: 0.5%
Religion not stated: 8.9%
Sikh: 0.3%

Target Population Profile

The SEND Team do not keep data for children's religion.

Impacts

The new resource provisions have been selected to consistently provide for SEND needs across the Borough, these new provisions will provide more parental choice and control regarding their child. The impacts will provide a new operating model where children will be in mainstream school supported by with a bespoke curriculum as and where needed. The provision also provides children with additional access to therapy rooms and sensory rooms with areas built fit for purpose locally.

The new framework allows for detailed consideration of the social, emotional, and mental health needs of children and young people with SEND. It is anticipated that the provisions will not disproportionately affect children of different religions.

4h. Sex

Data

Sex	EHC	SEN Support	Not SEN	Grand Total
F	29.2%	37.3%	51.6%	48.7%
M	70.8%	62.7%	48.4%	51.3%

Borough profile [11]
Females: (50.5%)
Males: (49.5%)

Target Population Profile

The profile of children with SEND demonstrates that boys are over-represented in the SEND system**.**

Gender	EHC	SEN Support	Not SEN	Grand Total
Female	29.2%	37.3%	51.6%	48.7%
Male	70.8%	62.7%	48.4%	51.3%

[10] Source: 2011 Census
[11] Source: 2011 Census

Further analysis of data in relation to SEND demonstrates that this over-representation of boys in SEND systems is widespread nationally and requires further analysis and attention.

Impacts

The commissioning capital build element of the projects will ensure that the fair, open and transparent consideration of children and young people's SEND needs, and the allocation of resources are being met and are regularly reviewed. The proposal is likely to have a positive impact on boys with SEND.

4i. Sexual Orientation

Data

Borough profile [12]
3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013. In Haringey this equates to 6,491 residents.

Target Population Profile

The sexual orientation of young people with SEND is not recorded.

Impacts

The provision made within the policies will ensure that all young people are supported to attend and access education. The new framework allows for detailed consideration of the social, emotional, and mental health needs of children and young people with SEND. It is anticipated that the provisions will not disproportionately affect children of different sexual orientations.

4j. **Socioeconomic Status (local)**

Data

Income
8.3% of the population in Haringey were claiming unemployment benefit on 9 December 2021.[13]
20.8% of the population in Haringey were claiming Universal Credit on 9 December 2021.[14]
29% of employee jobs in the borough are paid less than the London Living Wage.[15]

Educational Attainment
While Haringey's proportion of students attaining grade 5 or above in English and Mathematics GCSEs is higher than the national average, it is below the London average.[16]
4.4% of Haringey's working age populations had no qualifications in 2020.[17] 4.8% were qualified to level one only.[18]

Area Deprivation

Haringey is the 4th most deprived in London as measured by the IMD score 2019. The most deprived LSOAs (Lower Super Output Areas or small neighbourhood areas) are more heavily concentrated in the east of the borough where more than half of the LSOAs fall into the 20% most deprived in the country.

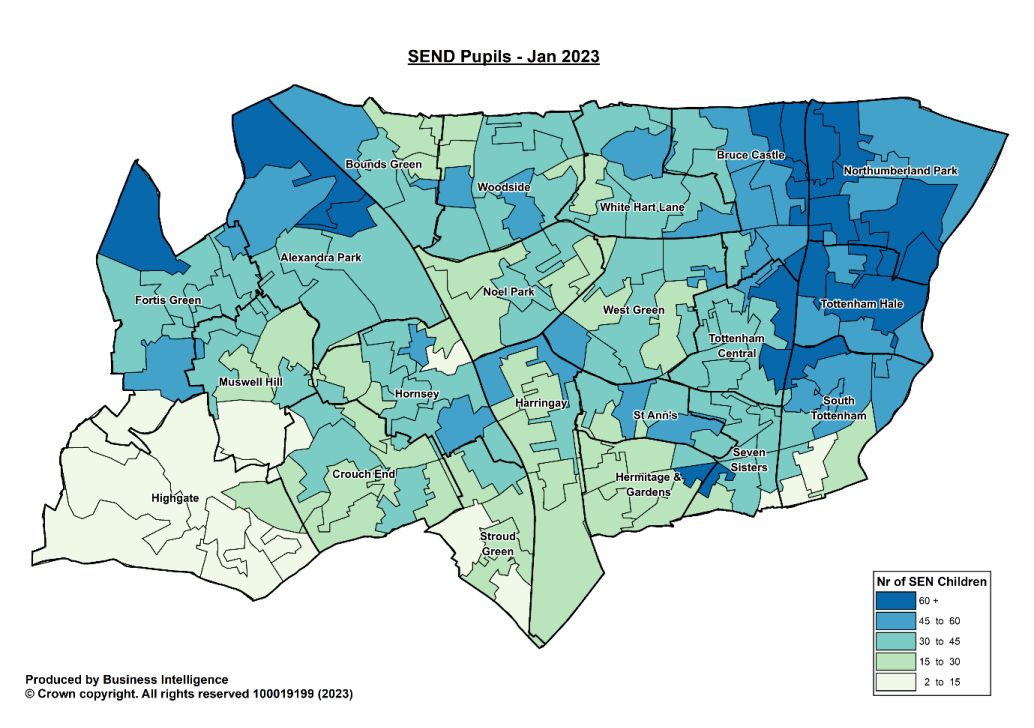
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[12] Source: ONS Integrated Household Survey
[13] ONS Claimant Count
[14] LG Inform
[15] ONS
[16] Source: Annual Population Survey 2019 (via nomis)
[17] LG Inform - qualifications
[18] LG Inform – level one

Target Population Profile

Number of children living in the 40% most deprived areas (Indices of Multiple Deprivation 2019)

Ward	0 yrs	1 yrs	2 yrs	Total
Bounds Green	88	118	101	307
Bruce Grove	194	186	176	556
Fortis Green	40	50	36	126
Harringay	97	85	88	270
Hornsey	185	169	178	532
Noel Park	173	166	176	515
Northumberland Park	270	281	288	**839**
Seven Sisters	288	306	313	**907**
St Ann's	178	192	155	525
Stroud Green	61	56	64	181
Tottenham Green	207	251	203	661
Tottenham Hale	237	252	244	**733**
West Green	164	149	150	463
White Hart Lane	157	174	175	506
Woodside	231	217	191	639
Grand Total	**2570**	**2652**	**2538**	**7760**



These data show that whilst there are high proportions of children with SEND in areas of high deprivation, there are also high numbers of children with SEND in the more affluent areas of the Borough too.

Locations of schools were considered during the bidding process to ensure that there is an adequate supply of provisions in all areas – including those with higher deprivation.

The geographic gradient of deprivation was also taken into consideration when deciding where resource provisions would be placed. There is also a benefit realisation that these provisions will have an impact not only on the child placed in the provisions but will have wider community benefits through the education support the pupil will ascertain.

These revised policies apply to all school-aged children educated in Haringey, in maintained and academy schools, and early years settings, and are designed to promote fair, open, and transparent allocation of resources from the high needs block for all children with SEND. Haringey children and young people with SEND achieve better academic outcomes than children and young people with SEND in other local authorities, according to national data (see Haringey Matrix)

Impacts

Provision of fair, open, and transparent resourcing, based on the needs of children and young people allows children and young people to be supported according to their needs which will promote education outcomes for children and young people in the Borough, including children in the East of the Borough where deprivation levels are higher.

Key Impacts Summary

5a. Outline the key findings of your data analysis.

The data regarding the users of the current SEND bandings and top-ups system (children with EHCPS) indicates that they are representative of the population of children and young people with SEND in Haringey.

The data show that boys and those from Black African, British, or Caribbean backgrounds are overrepresented in the SEND population. Additionally, there are high proportions of children with SEND in areas of high deprivation.

b. Intersectionality

Consideration of intersectionality demonstrates the disproportionate number of boys with SEND, and the data regarding home school indicates over-representation from Black Caribbean and Black African boys within the SEND service. It is therefore possible to argue that the service continues to support this cohort of young people and that improved data collection will support the evidence of impact.

Furthermore, there appears to be a spread of children with EHCPs across the borough but most particularly in areas of the Borough most associated with high levels of socio-economic deprivation.

5c. Data Gaps

There are significant data gaps regarding users of home-school SEND services which will be addressed via better monitoring and management via the new Liquid Logic software, including recording of religious faith and transgender identities.

6. Overall impact of the policy for the Public Sector Equality Duty

The proposal will increase equality of accessibility to education via provision for children and young people with SEND needs, these will be subject to locally based governance arrangements which ensure that parents and schools and the NHS work together with the Local Authority ensuring that administrative practice is fair, open and transparent and subject to regular scrutiny and evaluation.

7. Amendments and mitigations

7a. What changes, if any, do you plan to make to your proposal because of the Equality Impact Assessment?

No major change to the proposal: the EQIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality are undertaken.

7. Ongoing monitoring

Service to create improved data monitoring systems to record access to service by children from different backgrounds, and a range of disabilities**.**

8. Authorisation

EQIA approved by (Assistant Director/) Jackie Difolco.

Date 14 December 2023

9. Publication

Please ensure the completed EQIA is published in accordance with the Council's policy**.**

Please contact the Policy & Strategy Team for any feedback on the EQIA process.

Title: Haringey Safety Valve Programme

Report authorised by: Ann Graham, Director: Children's Services, Jon Warlow, Director: Finance

Lead Officer: Jackie Difolco, Assistant Director: Early Help, Prevention and SEND

Ward(s) affected: All

Report for Key Decision

1. Describe the issue under consideration

1.1 Haringey has been invited to make an application to participate in the 2022/23 'safety valve' programme whereby funding is provided to eliminate historic DSG deficits where, lasting sustainability and reaching an in-year balance can be demonstrated for its High Needs Funding budget. This paper reports on the proposals developed for consideration and approval.

2. Cabinet Member Introduction

2.1 The DfE have asked Haringey to apply to become part of the 2022/23 Safety Valve Programme which is designed to assist local authorities in reducing overspends in their High Needs Block expenditure – the funding which is provided for SEND. Currently Haringey is predicted to have a huge overspend in SEND by 2027/28, which, if left unchecked, could seriously undermine council finances. The government offer, whereby historic deficits could be eliminated, is predicated on LBH developing a series of detailed plans for systemic change, and service transformation.

2.2 This is a challenge for the Service, and one which I believe we can meet as we are already engaged on that change process of wider strategic transformation of SEND Services in Haringey. This process, underpinned currently by our Written Statement of Action is underway, in partnership with our key stakeholders in our schools, the wider education, health and care sectors, children, young people, and their families. This work provides a springboard for more extensive and longer-term change whereby SEND resources will be prioritised for early intervention, and support; and where changes as to how and where SEND services are provided are linked to a wider education strategy.

2.3 Key strands of this approach are set out in this report and provide the basis for a SEND service which aims to intervene early and provide support required without an EHCP; providing services locally in borough.

3. Recommendations

3.1 To approve the application based on the indicative workstreams and projects outlined in this report and further note that the indicative workstreams and projects are not yet agreed by DfE.

3.2 To delegate authority to the Director of Children's Services and Director of Finance, after consultation with the Cabinet Member for Children, Schools, and Families and the Cabinet Member for Finance and Local Investment, to make the initial application to the Department for Education (DfE) to enter the "Safety Valve" Intervention programme by 15 September 2022.

3.3 To delegate to the Director of Children's Services and Director of Finance, after consultation with the Cabinet Member for Children, Schools, and Families and the Cabinet Member for Finance and Local Investment, to make final changes to the proposals following feedback from the DfE in advance of the final submission on the 6 October 2022.

3.4 To approve, that, as part of the involvement in the 'Safety Valve' intervention programme, a request for capital will be submitted to the DfE, by 10 October 2022, to develop SEND provision in the Borough to aid delivery of the programme which will be incorporated into the strategic education master sites programme.

3.5 To note that the Quarter 1 Corporate Monitoring Report addresses the Safety Valve project funding within the General Fund for the current year, and that the ongoing annual cost of this project will be taken into account in the preparation of the next future years' Medium Term Financial Strategy.

4. Reasons for decision

4.1 As part of the Department of Education (DfE) work to address long term challenges in High Needs funding within the Dedicated Schools Grant (DSG), a number of identified local authorities, including Haringey, have been invited to have a financial agreement known as a 'Safety Valve.'

4.2 The agreement will require Haringey to achieve an in year balanced budget, currently £4.6m in deficit, within five years. If achieved, the DfE will provide assistance with funds to address the cumulative deficit, currently £21.5m, subject to Ministerial approval. If continued growth in High Needs expenditure remains unmitigated, the cumulative deficit is currently estimated at £83m by 27/28 and is therefore a critical financial risk to the Council; entry into the Safety Valve programme is the best option to mitigate this risk.

4.3 The Safety Valve programme is part of the wider strategic transformation of SEND Services in Haringey with our key stakeholders within education, health, care sectors, children, young people, and their families. As part of this transformation, resources will be prioritised for children and young people with SEND which will improve overall outcomes by having a clear focus on early intervention, service improvement, reduce overall demand for EHCP's and financial pressure on the High Needs Block.

4.4 This item has been properly notified on the Forward Plan with the required 28-day notice period as set out in Part Four, Section D, Rule 13 of the constitution and complies with the 5-day notice period for agenda publication. However, the initial application to the DfE must be made by 15 September 2022. Cabinet is due to consider the item at its meeting on 13 September 2022 and this would not leave sufficient time for the ordinary call-in period. This report could not have been considered earlier due to the short timescales provided to complete the substantial work required to inform the proposals alongside initial consultation with key stakeholders. It is therefore proposed that the call-in procedure shall not apply to this decision in order to submit the application by the deadline of 15 September 2022. This would be subject to the Cabinet decision on 13 September 2022.

4.5 Given the above, it is not practicable to comply with the call-in period requirement. The Chair of Overview and Scrutiny has agreed that the call-in procedure shall not apply to this urgent decision. This is because the decision is urgent and any delay in implementation caused by the call-in procedure would seriously prejudice the Council's or the public's interests due to the fact that Haringey will be unable to complete a submission to the Department for Education within their deadline. This decision will ensure that the deadline is met. Accordingly, the Chair of Overview and Scrutiny Committee has agreed that the decision is both reasonable in all circumstances and that it should be treated as a matter of urgency. This is in accordance with Part 4, Section H, and Paragraph 18 (a) and (b) of the Council Constitution.

5. Alternative options considered

5.1 The Council has previously produced a DSG Management Plan, coproduced with various stakeholders, with detailed actions in place to manage the deficit. The DSG management plan is underpinned by the High Needs Block recovery plan which is led by the Local Authority SEND service. This plan sets out a number of projects which are already in progress and subject to scrutiny at the DSG Steering Group chaired by the Director of Children's Services. Monitoring of progress is reported to the Schools Forum and SEND Executive (which has parent and carer representation) on a quarterly basis, this is also published on our SEND local offer and referenced within our SEND newsletter. Parents and carers are also represented on development sub groups delivering against a number of priorities that inform this work eg) Preparation for Adulthood, EHCP/Annual Review processes, Co-production and Health.

5.2 This plan has been further developed since the meeting with DfE and it is this revised plan which forms the basis of our initial proposal. The plan is a live document which we will continue to share with the DFE as the proposal further develops.

5.3 It is in the best interests of the Council to work towards a mutually agreed Safety Valve agreement as the ring fencing of the High Needs deficit may be removed, at which point the full deficit would have to be addressed in full in the Councils MTFS.

6. Background information

6.1 Haringey Council has continued to implement its improvement programme for SEND Services which was launched with its new SEND strategy (2021- 2024). The Council have invested significant funding to improve SEND Services and remains committed to working in co-production with parents, carers, and other key stakeholders to deliver improved programmes of support for children and young people with SEND and those who care for them. Key priorities are:

a) we will support children at the earliest opportunity to access the intervention they need to achieve and thrive.
b) wherever possible we will meet the provision needs of Haringey's children and young people locally.
c) we will work together to prepare children and young people for their adult lives

6.2 The SEND improvement programme involves significant reallocation of resources, with increased investment from the General Fund and Capital Programme to support new SEND initiatives and to reduce systemic pressures on the high needs block. For example, by investing SEND provision capital funding at Riverside School, The Grove School, and The Mulberry School, resulting in increased provision within the borough, children being able to access good quality education locally and decreasing the need for out of borough education placements which are also more costly. Other improvements include revision of the Home-School transport policies and investment in the Statutory Assessment Team and Education Psychology Services.

6.3 Our recent performance data indicate that children and young people with SEND in Haringey continue to achieve good education outcomes. The national Safety Valve Programme offers an opportunity to utilise DfE expertise and investment to create further systemic changes in Haringey's allocation of resources to support children and young people with SEND.

6.4 The DfE began the safety valve intervention programme in 2020/21 and have extended this programme in 2021/22, targeting the local authorities with the highest DSG deficits. The programme requires local authorities to develop and agree to substantial plans for reform to their high needs budget and escalating demands on SEND services, with support and challenge from the DfE's expert team, to work at pace to address and create systems and processes which support the creation of an in-year balanced budget. When a local authority can demonstrate sufficiently that their DSG management plan creates lasting sustainability and delivers good outcomes for children and young people, including reaching an in-year balanced budget within 5 years then the DfE will enter into an agreement with the authority.

6.5 The financial plan must be based on an agreed programme to achieve a financially sustainable High Needs service over a period of up to five years, up to 2027/28.This together with annual delivery plans would form the basis of the Safety Valve agreement, which would essentially reflect a contract between the Council and DfE, the successful delivery of which would move the service into an in-year balance budget position by the end of the five years.

6.6 The agreed plan will be subject to quarterly monitoring reports, if there is any doubt that the proposals set out in the agreement will not be achieved, it may lead to the withholding payments, or reducing previously agreed future instalments, which contribute to decreasing the deficit.

6.7 Last year's (2021-2022) deficit position was £4.6m (in year), without a mitigation strategy this will increase annually, projected to be £19m in year by 2027/28. The present aggregated deficit to date is £21.5m and this will inevitably increase each year until a balanced budget is achieved. The latest forecast, using inflation and grant factors provided by the DfE, indicate that the cumulative deficit might rise, before any further mitigations put in place as part of this programme, to approximately over £80m. The negotiations will lead to the DfE proposing how much of that eventual deficit they will meet. Any remainder would fall on the Council's General Fund, and DFE have been made aware of the difficulty that would present to the Council.

6.8 Haringey have been asked to submit an initial proposal to DfE by the 15 September 2022 and, after feedback, a final proposal by 6 October 2022. Subject to Haringey Cabinet and Ministerial approval, Haringey would then enter the Safety Valve programme. An application for DfE capital funding to support Haringey's programme will also be submitted by 10 October 2022.

6.9 Significant work has been completed over the past year on internal housekeeping, with a number of projects underway to mitigate against the increasing overspend, providing increased confidence in the council's DSG financial position as we continue to engage with the DfE.

7. Report

National Context

7.1 While Haringey's position is concerning, it is not unique. The recently published National DSG Report highlighted the following key findings:

a) high needs deficits exceeded £1.35bn for 80 respondents in March 22, forecast to be £2.6bn in March 2025. As a projection, if all LA's had responded, nationwide this could reach almost £3.6bn.
b) on average, High Needs overspends are 7-8% per year, Haringey is 10%
c) in general, Safety Valve arrangements are forecasted to make significant improvements, but significant deficits and uncertainty remain,
d) significant variation exists between respondents with approximately half (£1.35bn) of March 2025 deficits being comprised from just nine respondents,
e) whilst the aggregate deficit figures reported above are inflated by a few respondents, the general trend of ever-increasing High Needs Deficits is seen in a vast majority of cases,
f) significant deficits are being reported by London Boroughs,

Haringey Context

7.2 Haringey services and schools are identifying an increasing number of children with SEN needs as evidenced by the increasing demand for statutory assessments and EHC plans. The number of children and young people with an education, health, and care plan (EHCP) was 2,637 at the beginning of August 2022 compared with 1,820 in 2018 and 2,398 at the end of 2021.

7.3 Analysis of data indicates that Haringey has increased demand for services for children and young people with ASC (autistic spectrum condition) and SEMH (social, emotional, and mental health) as their primary need. Whilst the authority has increased its provision for children with ASC by increasing school places. Haringey has no designated provision for children and young people who require special school provision to meet their SEMH needs. This can result in the use of expensive out of borough independent provision, creating pressure on the high needs block.

7.4 Haringey receives approximately £201m in Dedicated Schools Grant (DSG) for maintained schools. The DSG is spilt into 4 blocks: Schools, High Needs, Early Years and Central School Services. The DSG reserve is ringfenced and outside the council's general fund reserves. The cumulative DSG deficit is significant at £21.5m, is continuing to increase and unsustainable. This pressure is entirely due to pressures in the High Needs Block. Under present regulations, this deficit cannot currently be funded from the General Fund without ministerial approval, even if the Council could afford it, but must be dealt with from future DSG income.

7.5 The DSG current management plan is based on estimations of 10% annual demand increase in EHCP's. Whilst for the first time since 2016/17 we are starting to see the number of requests for EHCP's reduce, the overall number of plans continue to increase (7% increase for 21-22 compared with previous year). Through the Safety Valve action plan, we need to introduce measures to alleviate that trajectory via different and more affordable care routes, reducing High Needs costs generally. This is challenging as pressures include complexity of plans, lack of in borough provision for children with social, emotional, and mental health (SEMH) and Autism, and the need for a graduated early intervention response to meet the needs of children and young people earlier.

Draft Safety Valve programme proposal

Key Influences on programme development

7.6 The DfE has issued guidance and case studies from Local Authorities already engaged in the Safety Valve programme outlining two principal goals which are critical to reach sustainable positions, which are appropriately managing demand and effective commissioning arrangements.

7.7 DfE guidance also advised that areas of focus are interlinked, a joined-up and co-produced commitment to sustainability with local authority leaders working together to give the high needs system the priority and focus it requires. As such families should be at the heart of decision making to ensure viability of any plans, reflecting the statutory duty to co-produce SEND services with parents, carers, and providers. Officers from finance and education have been working closely together with joint responsibility for the delivery of the High Needs Recovery plan. Progress against the plan is reported to parents and carers via the SEND Executive Board, but also by involving parents and carers in the key programmes developing the SEND improvement plans.

7.8 Changing the culture from one in which a lack of confidence or access to services drives the demand for EHCP's for children and young people with SEND to one in which there is confidence in the provision ordinarily available in schools and will be a key requirement of a successful safety valve programme. Working in collaboration with elected members, school leaders, parents & carers will be essential to developing cultural change, sustainability, and confidence in the SEND system.

7.9 The DfE have also provided authorities entering the programme several case studies as examples of how some local authorities have approached the Safety Valve objectives. Areas of focus include early intervention, increased SEN support offer for children without an EHCP, robust assessment processes and application of thresholds, cultural change and shared ownership with partners, parents and carers and thorough provision mapping to ensure there is sufficient high-quality provision for young people.

Demand and cost alignment of EHCP's.

7.10 To identify and inform projects included in our proposal it is critical to understand points of significant demand in terms of the principal need for C&YP's EHCP's and the cost of the provision of the services associated with them. Table 2 below shows the demand and growth since 2018.

Table Two: Demand by Primary Need 2018 – 2022

EHCP numbers growth from 2018/19 with average percentage growth shown

Type of Need	2018	2019	2020	2021	2022	Average Annual Growth	2021-22 Annual Growth
Autistic Spectrum Disorder	711	768	921	1,035	1,121	14%	8%
Hearing Impairment	45	49	59	63	72	15%	14%
Moderate Learning Difficulty	358	350	375	402	407	3%	1%
Multi- Sensory Impairment	2	1	1	1	1	-13%	0%
Physical Disability	101	96	104	108	109	2%	1%
Profound & Multiple Learning Difficulty	39	41	40	49	50	7%	2%
Social, Emotional and Mental Health	205	210	227	289	284	10%	-2%
Speech, Language and Communications needs	242	255	317	340	419	18%	23%
Severe Learning Difficulty	55	50	45	49	40	-7%	-18%
Specific Learning Difficulty	42	37	54	41	43	1%	5%
Visual Impairment	19	20	21	21	21	3%	0%
Other Difficulty/Disability	0	0	0	0	0	N/a	N/a
SEN support but no specialist assessment of type of need	1	0	0	0	0	N/a	N/a
Total number of EHCPs by primary need	**1,820**	**1,877**	**2,164**	**2,398**	**2,567**	**10%**	**7%**

- ASC is the area of highest need and demand has grown by 14% on average and 8% in 2021/22
- SEMH has grown by 10% on average but demand reduced slightly in 2021/22
- Speech, Language & Communications is the second largest group in absolute terms but has the highest continuous growth being 8% on average and 23% in 2021/22
- Average annual growth over 5 years is 10.3% compared with growth of 7% in 2021/22
- Haringey also has a higher growth in children with Hearing Impairment, the reasons for this are being further explored, but numbers of children remain low and could be correlated with Haringey having a specialist provision for Hearing Impaired children (Blanche Neville School) creating demand in this area.

7.11 From our detailed analysis and costings, we have evaluated all of our interventions to ensure that they will improve outcomes for children and young people, through inclusive local provision of services, including early intervention in schools, and savings associated with these improved outcomes.

7.12 The development of the Councils initial proposal has been shaped by the influencers discussed earlier and consists of three workstreams each of which consists of individual projects that will have their own objectives and savings targets.

7.13 Three workstreams and projects developed are consistent with DfE recommendations for areas of focus to manage the demand for EHCP's, reduce costs by more effective commissioning and the use of capital to develop in borough provision.

7.14 **Workstream A** (Demand Management) has several projects that will increase the level of early support and interventions for children with needs associated with Autism, Speech, Language & Communication and Social Emotional and Mental Health, which will reduce the escalation to requiring an EHCP, in our primary and secondary school settings. Similarly earlier interventions and support will strengthen provision in Early Years setting with the overall objective that no child under 5 will require a EHCP to fully meet their needs. All of these projects will help reduce the demand for EHCP's and therefore reduce costs.

7.15 **Workstream B** (Commissioning) will focus on creating in borough provision for Social Emotional and Mental Health needs below and above the threshold of a EHCP and similarly develop resources in local primary and secondary schools to meet the needs of children requiring support for Autism. Projects will also ensure value for money for all other services including our Alternative Provision offer. It will also include a project to address our expenditure on top ups for C&YP with EHCP's where our expenditure of approximately £21m is seen as an outlier nationally. An additional significant area to help reduce costs will be the use of capital to enable inclusivity in mainstream schools by investing in Special Units and reducing the need for out of borough expensive provision. Our capital strategy is discussed in more detail below.

7.16 **Workstream C** (Culture, Governance and Leadership) projects will not produce savings in themselves, but they will act as enablers for other projects and provide the leadership and cultural change necessary to ensure sustainability in systems and processes. These projects will involve collaboration with school leaders, parents, parents and C&YP.

7.17 Work is ongoing to determine if these measures will suffice or whether other avenues will also need to be pursued and this will become clearer over as the projects continue to be developed prior to submission of Haringey's proposal.

7.18 A summary of the key projects are outlined below:

Proposed Safety Valve Projects

Creating in- borough provision

- We will create specialist resource units for children with ASC within existing good or outstanding mainstream schools to encourage inclusivity in mainstream and thereby reducing the demand for out of borough expensive provision. There will be 10 resource units in primary settings and 25 units in secondary.
- We will develop an in-borough provision or resource provisions in mainstream schools for children and young people who have social, emotional, and mental health needs (SEMH). There will be 10 units in primary settings and 25 units in secondary.
- Increasing provision to respond to sufficiency for children and young people with complex needs.

Therapies investment (jointly with the Integrated Commissioning Board)

- We will develop a graduated response need and therapies toolkit for SENDCOs, review & expand therapeutic support for Speech & Language and Social, Emotional Health (SEMH) and develop training and outreach teams to support C&YP with Autistic and SEMH needs. Both these projects will reduce escalation to EHCP's in primary and secondary schools.

Investment in early years and supported internships and apprenticeships for young people with SEND

- We will address the number of EHCP's, where Haringey is an outlier, by reforming our Early Years offer to ensure only children with the most complex needs aged under 5 will require a EHCP to secure appropriate support and ensure that all YP over the age of 16 have appropriate employment and internship opportunities where this is the most appropriate offer.

Investment in Early Intervention

- We will develop an earlier response to identified needs and a timelier response through the investment in early intervention services. This will have the impact of reducing the number of EHCP's in Haringey in accordance with national averages.
- We will embed SEND support tools and core standards and expectations within schools and settings.

Effective commissioning and brokerage arrangements

- We will review of our current Alternative Provision (AP) model and funding and create more cost-effective commissioning of services e.g, moving away from spot purchasing.
- We will develop a primary and secondary SEMH outreach team.
- We will rationalise our overall £21m spend on "top ups" for EHCP's by remodelling our support to mainstream schools and in- borough special schools to reduce the number of children and young people moving into Special and Independent Schools. This is an area where Haringey is an outlier in terms of spend for special schools per capita.
- Where we have young people who are placed in education, out of borough, where appropriate, we will work with them, their parents, and carers at key transition points to support them to access post 16 education within Haringey.
- We will review financial contributions from health to ensure they are appropriate and equitable.

Robust decision making and application of thresholds and upskilling the multi-agency workforce.

- We will continue to improve consistency and rigour in our Statutory Assessment Team to ensure that thresholds are appropriately applied and that our annual plan review processes are reflecting improved outcomes with appropriate cessation of plans.
- We will undertake process mapping and analysis that will improve quality and efficiencies.
- Working in collaboration with Haringey Education Partnership (HEP), we will develop a comprehensive and robust workforce development programme for mainstream schools.

Block transfer from other parts of DSG

To ensure a more sustainable system, whilst we review and remodel the distribution of High Needs funding, we will request approval from the Schools Forum for a block transfer of funds from other blocks within the dedicated schools grant to reduce the high needs block overspend over a number of consecutive years. This is an approach that has been used by other local authorities to reduce the overspend position as part of a longer-term approach alongside transformation work, reallocating resources to directly invest in the delivery of SEND services, impacting on improved outcomes for children and young people and meeting our statutory duty.

7.19 In meetings with DfE Advisers on 27 July and 24 August 2022, it was noted and agreed that the approach taken to date was robust and that the projects we had identified were the type of projects they would expect to see of this scale.

7.20 To support effective implementation of the programme, £400k per annum for three years has been allocated from the general fund, to fund a 'Programme Team' which will consist of programme management, business, data, and financial analysis.

7.21 Any associated costs for implementation of the individual projects will be funded within the high needs block where they are eligible for spend as per the terms and conditions of the high needs block, and the Safety Valve financial proposals will take account of the estimated spend levels. It is yet to be evaluated as to whether the measures currently be explored will suffice or whether other avenues will also need to be pursued and this will become clearer over as the projects continue to be developed prior to submission of Haringey's draft and final proposals.

Capital Funding Opportunity

7.22 In support of the Safety Valve programme, Haringey has been invited to make an application for capital funding which will need to be submitted by 14 October. Whilst the DfE have not applied any financial restrictions, they have advised that applications agreed with other Local Authorities on the programme have averaged circa £5.0m and to consider that as part of our proposals.

7.23 As part of the Asset Management Plan in 2020, SEND and Alternative Provision were identified as a key area of focus to explore. This has resulted in the development of the strategic education sites masterplan outlining a series of options and proposals for consideration by Cabinet. The Council's capital programme presently includes £12m to support the development of Alternative Provision.

7.24 A further £3.5m SEND Provision Capital Funding has been allocated to Haringey for the next 2 academic years. This will be offset against the Education Sites Masterplan for SEND provision. Therefore, combined, the potential capital funding for SEND/AP provision may be in the region of £20m which would have a significant impact in delivering a successful safety valve programme. This will include the capital bid for the resource units for children in primary settings and resource units in secondary setting referred to above. Other potential capital opportunities to support the Safety Valve programme, for inclusion in the application for funds to DfE continue to be identified as plans progress.

Next Steps

7.25 An initial bid proposal will be submitted to the DfE on 15 September 2022. There will be continued discussion and support from the DfE throughout the process leading up to the final submission of our proposal on 6 October 2022. Approval would then be expected from the Secretary of State by December and the agreement published in March.

7.26 A communications plan is being developed to build on existing mechanisms in place (as outlined at 5.1) to engage our stakeholders including parents and carers further in this work in more detail.

8. Contribution to strategic outcomes

8.1 The proposals outlined, align with the priorities within Haringey's Early Help Strategy, Haringey's SEND Strategy and the 'Borough Plan – Priority 2 (People)' specifically:

- Happy childhood: all children across the borough will be happy and healthy as they grow up feeling safe and secure in their family, networks, and communities
- Every young person, whatever their background, has a pathway to success for the future
- All adults are able to live healthy and fulfilling lives, with dignity, staying active and connected in their communities

9. Statutory Officers comments

Finance

9.1 The DSG cumulative deficit currently totals £21.5m and with assumptions on demand growth, mitigation of demand growth, inflation estimates and grant income projections the DSG is forecasting a cumulative deficit of over £80m by 2027/28. This deficit is forecasted solely within the High Needs Block.

9.2 The Department for Levelling Up, Housing and Communities (DLUHC), requires DSG deficits to be held in a separate reserve in local authorities' accounts. Regulations are in force to allow this accounting treatment up to and including the accounts for 2022/23. The forecasted cumulative deficit needs to be addressed as once the regulations to show deficits separately are removed, this will impact the Council's General Fund, resulting in a profound impact on statutory services in other areas.

9.3 There has been £250K investment in 2022/23 to fund the Safety Valve programme team, with the costs factored into the 2022/23 Q1 monitoring. Ongoing costs of the programme team from 2023/24 onwards totals £400K per year which is recommended to be accommodated through the MTFS.

9.4 Additional Capital Funding will be sought from the DfE to invest in key proposals to deliver revenue savings to the DSG through the Safety Valve Programme. This additional funding and existing capital funds results in a potential £20m of capital funding for SEND/AP Provision for Haringey.

Procurement

9.5 Strategic Procurement note the contents of the report. There are no current procurement implications associated with the report and recommendations. Strategic Procurement will work with the service area to support the delivery of any procurement activity.

Head of Legal & Governance

The Head of Legal & Governance has been consulted on this report and makes the following comments:

9.6 The Dedicated Schools Grant [DSG] is payable to local authorities under s14 of the Education Act 2002 to support the schools budget including provision made by the council for pupils with special educational needs and disabilities. The DfE strongly encourages all authorities to have plans in place to ensure the sustainable management of their high needs systems, for the benefit of the children and young people they serve.

The Safety Valve programme requires local authorities to develop DSG management plans. The DfE will enter to an agreement with authorities whose plans demonstrate lasting sustainability. Local authorities demonstrating progress will receive incremental funding to eliminate their historical deficits, with funding being withheld if milestone are not met.

9.7 In June 2022 the DfE published guidance entitled *Sustainability in high needs systems, guidance for local authorities,* designed to assist local authorities to review their SEND and consider their strategic approach to high needs funding and develop their DSG management plans. The guidance makes clear that plans must have the support and engagement of local leaders, schools, parent and carer forums and other key stakeholder. The Education & Skills Funding Agency operational guidance 'Schools revenue funding 2022 to 2023' (Updated December 2021) provides that DSG management plans should be discussed with the schools forum on a regular basis and should set out the local authority's plans to bring the DSG spend back into balance.

9.8 The Education and Skills Schools operation guidance: 2023 to 2024 updated August 2022 provides that Local authorities require school forum approval in order to move up to 0.5% from the schools block to another blocks. Local Authorities considering a transfer of funds out of the high needs block should ensure adequate consultation with the relevant representatives on the schools forum and with any providers likely to be affected by the transfer.

Equalities

9.9 The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- advance equality of opportunity between people who share protected characteristics and people who do not
- foster good relations between people who share those characteristics and people who do not.

9.10 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. The first part of the duty applies to marriage and civil partnership status only. *Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.*

9.11 The provision of services for children and young people with SEND and their parents and carers ensuring that the Council is meeting its statutory duties in relation to increasing the participation and equality of young people with special education needs and disabilities, via their access to education, health and care services.

9.12 The proposed decision is to approve engagement in the Safety Valve Programme, whereby upon successful proposals to reduce the in-year financial overspend is achieved, funding is provided to eliminate historic DSG deficits with lasting sustainability and reaching an in-year balance. All the projects will affect:

- children and young people with SEND
- parents and carers of children and young people with SEND
- partners within education, health and care sector impacted by delivery of the proposals
- workforce capacity to respond to delivering the projects

9.13 The objective of the proposals is to alongside the SEND service improvement programme as underpinned by Haringey SEND Strategy 2022- 2025, implement a transformation programme across the SEND system, that will both create positive change and improved outcomes for children and young people with SEND and achieve a balanced in year budget for the High Needs Block within the Dedicated Schools Grant.

9.14 The duty to co-produce services with children and young people with SEND and their families is recognised and specifically addressed within the SEND Strategy 2022 - 2025.

The SEND strategy recognises that SEND affects children and young people differently according to age, gender, and socio-economic background and as such the strategy and proposals intend to ensure that the specific inequalities which affect these groups and that these actions are accountable.

9.15 The proposals represent a range of measures taken to achieve the level of savings required in the short term, however this is balanced against wider benefits and improved outcomes for children and young people with SEND and their families; advance equality of opportunity for children and young people with SEND and their families and specifically to work closely via co-production to ensure that the necessary service improvements fulfil the needs of this cohort particularly those with protected characteristics.

9.16 An equalities impact assessment is underway to understand the key groups who will be affected by the proposals, how they will be impacted by these, and any mitigations that might be needed in order to ensure that the public sector duty is met. This will be finalised and monitored with any emerging issues identified and addressed. The Council will take steps to collect demographic data on service users in order to identify any inequalities in service provision that may arise and to inform future equalities analysis.

10. Use of Appendices

Department for Education case studies - Sustainable High Needs systems.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1003162/Case_studies_-_Sustainable_high_needs_systems_16July2021.pdf

11. Local Government (Access to Information) Act 1985

N/A

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Report for: Cabinet – 6 February 2024

Title: Extension of contracts for the provision of bundled hours home support and reablement services

Report authorised by: Vicky Murphy – Service Director, Adult Social Services

Lead Officer: Rebecca Cribb – Service Manager, Adult Social Care Commissioning, Brokerage and Quality Assurance
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Ward(s) affected: All

Report for Key/ Non Key Decision: Key Decision

1. Describe the issue under consideration

1.1. This report seeks approval for the execution of an 18-month extension to twelve (12) Call-Off contracts for the provision of bundled hours home support and reablement services (listed in Appendix 1 of this report), as provided for in the original tenders.

1.2. Beginning in 2020, with a second tender in 2021, Haringey Council introduced, through the award of twelve Call-Off contracts, a new and ambitious model of home support and reablement. The model draws on best practice from other local authority areas as well as being coproduced with Haringey residents and their families/carers, a range of health and social care professionals, and home care agencies and their staff.

1.3. The model is designed on a localities footprint, with a small number of providers contracted to deliver up-to 70% of Haringey's home support and reablement care hours within each of the three locality areas (East, West, and Central Haringey). The contracts and associated service specification, set out an ambition for providers to work in a person-centred and outcomes-focused way, enabling and promoting personal independence wherever possible to support people to live as independently as possible for as long as possible. The localities design increases the opportunities and ability for collaborative working between the service providers and other health and social care professionals working within those locality areas, and thereby better enables achieving outcomes for residents.

1.4. The value of contracting providers in this way is that we can build better relationships with providers and strengthen the outcomes achieved. The

alternative would be to ‘spot purchase’ individual care based on availability which would result in a larger number of providers and less ability to manage the outcomes and quality of the services provided.

1.5. On 10 March 2020 and 9 February 2021, the Cabinet approved the award of twelve (12) Call-Off Service Agreements (contracts) for the provision of Home Support and Reablement services to successful tenderers with an option to extend for a further two years to 31 August 2025 (if extended).

1.6. Contract reviews to date indicate that we are beginning to see the positive changes expected from these contracts, including: a higher volume of care hours being provided by fewer providers; stronger relationships between providers, Commissioners and Quality Assurance, and an ability to deal effectively with quality assurance concerns; a reduction in delays putting care in place across the borough and across all levels and types of need; more residents benefiting from a period of enablement-based care; and better conditions for care staff including higher rates of pay and more guaranteed work hours.

1.7. It is anticipated that the extension period will allow sufficient time for the fuller benefits of the contracts to be realised. These timescales also align to some key dependencies to realising the fuller benefits including; an investment in Quality Assurance and Contract Management capacity which is being implemented through the Adult Social Care Commissioning Peer Review; and the move to localities-based working for adult social care services which is already underway with new work allocated on a locality basis and defined locality teams due to be in place by April 2024, and will enable greater collaborative working with the service providers.

2. Cabinet Member Introduction

2.1. Since the introduction of the contracts there has been measurable improvements in the home support and reablement offer to Haringey residents. A larger proportion of care hours are being delivered by a smaller number of providers, which we know enables a more unified approach between care providers, social care and health professions, and the voluntary and community sector. We have also seen more effective contract monitoring and quality assurance through less Council resource needed to ensure efficacy in delivery outcomes, which has enabled us to support providers to remain in the care market. Amongst providers delivering these contracts we have seen fewer packages handed back and fewer complaints about consistency and continuity of care. Importantly we have been without seeing the waiting lists that other London boroughs and parts of the country are experiencing. A significantly higher proportion of clients are receiving a period of reablement to enable as much independence as possible. For our valued care workers the contracts have led to improved contractual terms for care workers with providers required to pay LLW and guarantee care hours.

3. Recommendations

3.1. For Cabinet to approve, pursuant to Contract Standing Order 10.02.1 (b) , the extension of twelve (12) contracts for the provision of bundled hours home support and reablement service, for an 18-month period, from 1 March 2024 to 31 August 2025. The twelve contracts are listed in Appendix 1 (exempt) of this report.

3.1.1. The maximum cost of extending for 18 months, if all care hours are utilised, is £15,064,920, taking the combined total contract values to a maximum of £42,786,315. For the avoidance of doubt, payment will be made on services called-off and delivered only, and the estimated likely spend for the 18 month period, based on current utilisation, is £12.3m.

4. Reasons for decision

4.1. Haringey's model of care for home care support was developed using a co-design process that engaged with front line care workers, provider agencies, service users, and social care staff, and reflected best practice in delivering home support and reablement services from across the country.

4.2. The contracts have been running for between two and three years, and a review of performance across the contract shows the contracts are performing well:

- between 70 and 80% of the contracts' care hours are being utilised. The ambition is to increase to 90-100% within the contract extension period.
- 89% of packages are commissioned with a few hours of referral; and most packages are commissioned within 24-48 hours
- Package hand backs are low with just a handful of packages handed back since the start of these contracts where it was felt that the provider could not meet the needs of the client or at the client's request.
- Client satisfaction is reported as top quartile, with the council receiving fewer complaints from clients, family or social care staff.
- Around 90% of planned visits are made and continuity of care provider is good.
- Although workforce recruitment and retention issues persist, as they do regionally and nationally, providers have reported that the ability to offer greater pay, more care hours and in defined geographical areas that limit the need for travel, has perhaps shielded them from the worst effects of the prevailing climate, has allowed them to increase their employment of Haringey residents and has facilitated some overseas recruitment. All providers are reporting use of fixed hour contracts and payment of London Living Wage (LLW).

4.3. Although there have been issues with several providers being CQC rated Requires Improvement, leading to a suspension in new packages, one of the strengths of the new model, with a smaller number of providers, has meant we have been able to target our finite Provider Quality Assurance (QA) resource to work intensively with these providers to ensure their improvement plan is implemented in a timely manner. To date, five providers

have been suspended, and three of the five providers have had their suspension lifted.

4.4. Areas for focus moving forward are reporting and achievement of reduction in care hours and delivery of outcomes-based care, and supporting clients to connect into their local community and networks.

4.5. As part of the implementation plan for the Adult Social Care Commissioning Peer Review undertaken in Autumn 2022, a Quality Assurance and Contract Monitoring Framework (QACMF) has been launched, and we will also be increasing the number of officers working in these areas. This will ensure that going forward regular contract monitoring and on-site provider visits will take place; these providers will also receive at least two Contract Monitoring meetings and two QA visits a year. This will enable a more proactive approach to addressing and resolving contractual performance and quality assurance issues.

4.6. The move towards adult social care service localities will further assist efficacy of service delivery for these contracts, as it will facilitate area knowledge and enable greater collaborative working with social care professionals. care workers to more easily reduce travel time for care workers and the move to localities-based working for adult social care services which is already underway with new work allocated on a locality basis and defined locality teams due to be in place by April 2024, and will enable greater collaborative working with the service providers.

5. Alternative options considered

5.1. **Do nothing:** the contract would end on 28 February 2024 and would undermine all the progress the Council has made with the successful providers to-date. It would also put at risk continuity of care for clients as providers may choose to hand back packages of care.

5.2. **Go out to tender:** It would be possible to go back out to tender but given the imminent expiration of the contract, will not allow for a full procurement process to be undertaken. It would also disrupt the good relationships and progress made with the providers to date. Given the challenges in the market and our duty to ensure sustainable fee rates, it would be unlikely to produce a reduction in cost.

6. Background information

6.1. Domiciliary care is a vital, regulated service which is needed to enable the local authority to fulfil its duties under the Care Act 2014. There are three main ways in which Haringey makes support available to local residents:

1. Reablement is short term support offered to people in their own homes.
2. Direct Payments offers a route to enabling people to remain in their own homes with greater choice and control.

3. Home support is the third way the Council helps residents in the need of additional help to remain as independent as possible in their own home for as long as possible.

6.2. There are currently around 1,520 Haringey adult social care service clients receiving home support or reablement, which equates to almost 25,589 hours of care a week. Haringey spends in excess of £24m a year (gross cost) on home care and externally provided reablement services, projected for 2023/24 representing around 20.5% of Haringey spend on packages of care for adult social care clients.

6.3. Prior to the introduction of these contracts, all home care packages and externally provided reablement packages were commissioned on a spot purchase basis via Haringey's Dynamic Purchasing System (DPS). At any one time approximately 70 providers were delivering services, most of which were small or micro, including not-for-profit organisations and Small and Medium Sized Enterprises (SME's). Whilst flexible, this method of commissioning was found to be not conducive to market sustainability and was impacting on providers' ability to recruit and retain care staff and to provide continuity of care. It was also impacting on the Council's ability to source care particularly in hard to serve areas of the borough, as well as its ability to effectively manage quality and performance of such a wide range of providers.

6.4. A local review of home support was carried out and at the time, the London ADASS home support commissioning review, identified the following challenges facing Haringey home support.

a) Sustainability in the market and the workforce

b) Carer career progression

c) Efficiency and market plurality

d) Price sustainability, including the balance between moving forwards to LLW and achieving best value.

6.5. The model introduced in 2020, is based on findings from a co-design process, which followed the review outlined in 6.4, which engaged with front line care workers, provider agencies, users, carers and social care staff.

6.6. It was anticipated that the new model of care would deliver improved outcomes, offer a more sustainable service, and create better conditions for the workforce. Some of the features of the new model include:

a) 70% of home care and reablement packages would be purchased through the 'bundled hours' arrangement.

b) 30% of home care packages would remain as spot purchases and would be sourced using the Dynamic Purchasing System (DPS) to ensure that opportunities were there for smaller and medium sized providers to remain or enter the market.

c) Providers are required to pay all care workers London Living Wage (LLW) meeting the Council's commitment to LLW.

d) Providers operate across a wide range of health and care needs.

e) Improved workforce recruitment and retention through improved contractual arrangements.

6.7. The tender process and contract extensions to date

6.8. On 10 March 2020, the Cabinet approved the award of three (3) Service Agreements (contracts) for the provision of Home Support and Reablement services to successful tenderers for a period of three years with an option to extend for a further two years.

6.9. A variation of commencement date was subsequently approved to postpone the commencement date to 1 September 2020, due to delays in implementation caused by the Covid-19 pandemic. Contracts were awarded to three organisations but only two accepted the contract, the third provider withdrew their offer post award.

6.10. On 9 February 2021, the Cabinet approved the award of a further ten (10) contracts for a period of 29 months commencing from 12 April 2021 to 31 August 2023 with an option to extend for further period of up to two (2) years.

6.10.1. On 6 December 2023, the Cabinet Member for Health, Social Care, & Wellbeing, agreed to an initial 6-month extension whilst contract reviews were undertaken, and noted that a subsequent report would be prepared to consider whether the council should exercise its option, under the original tender, to extend the contracts for up to a further 18 months.

6.11. Current Bundled Hour Contract and Market Position

6.11.1. Currently providers are delivering around 70-80% of the maximum value of the contracts. Regional challenges in recruitment and retention of workforce have prevented being able to reach the 90-100% desired for these contracts, which we anticipate being able to achieve during the extension period, with more capacity to support providers in their workforce challenges including access to support provided as part of the North Central London (NCL) Workforce Programme. Whilst there is not a significant issue with capacity in the overall home care market, a larger proportion than desirable continue to be delivered through spot purchase contracts via Haringey's Dynamic Purchasing System (DPS), which means that we continue to work with a large number of providers to enable the development of effective strategic relationships.

6.11.2. Although there has been a shift in policy to delivering more reablement "in-house" which has led to a reduction in the number of reablement packages purchased through the Bundled Hours Providers, projections nevertheless indicate that there are still sufficient home care hours to meet the minimum number of guaranteed hours from the Service Providers each year. Nevertheless, the Bundled Hour Providers continue to work in an enabling

way and promoting personal independence wherever possible to support people to live as independently as possible for as long as possible.

6.11.3. In line with our contractual terms and procedures, the Council shall continue to suspend the service providers whose CQC rating is dropped to 'Requires Improvement' and support the provider to implement its Improvement Plan. No new cases will be allocated to suspended providers, and existing cases will be monitored within our Adult Social Care Quality Assurance and Contract Monitoring Framework.

6.12. Contract Management and Performance Monitoring

6.12.1. Key Performance Indicators (KPI's) and methods of measurement were integrated into the contract requirements and were to be monitored through contract monitoring meetings and reports. Most of this activity is now taking place, with identified contract managers and monthly contract monitoring in place. Haringey's recent Commissioning Peer Review is also addressing the need to have more Contract Management resources in place to undertake robust monitoring and thereby ensuring value for money, outcomes based contracting and compliance.

6.12.2. Since the introduction of the contracts, analysis shows that a larger proportion of care hours are being delivered by a smaller number of providers, which we know has several benefits: a more unified approach between care providers, social care and health professions and the voluntary and community sector; more effective contract monitoring and quality assurance as it requires less Council resource to ensure efficacy in delivery outcomes, as well as allowing the Council to develop crucial partnerships with Providers to assure quality and continue to improve value.

6.12.3. The contracts have also led to improve contractual terms for care workers with providers required to pay LLW, Travel and Waiting Time, and forgo their use of zero hours contracts. The commissioning review will consider the consistency with which these requirements of the contract are being adhered to.

6.13. **Adult Social Care Commissioning Peer Review**

6.13.1. The Peer Review for the statutory Adult Social Care Commissioning team took place in September to October 2022. It used an evaluation format from the Public Sector Transformation Academy (PSTA) called the "Commissioning Playbook". In addition to the 8 evaluation areas of the Playbook, a ninth strand, Structure was also evaluated.

6.13.2. The outcome of the Peer Review's report was a series of Recommendations, falling within four areas of a balanced scorecard: Workforce; Residents & Community; Foundations & Information; and Finance.

6.13.3. A programme plan to transform and develop the statutory Commissioning Function has been in place since May 2023, in order to deliver the Recommendations of the Peer Review.

6.13.4. Workforce deliverables, which include increased resource in both Commissioning and Quality Assurance, will ensure that proactive contract management and quality assurance reviews of more providers are possible.

6.13.5. Foundations & Information deliverables have included the delivery of the Quality Assurance and Contract Monitoring Framework (QACMF), which implements a monthly, interdisciplinary QACM Board to review those providers within the Framework; a referrals process; a quality monitoring process (which incorporates the current Establishment Concerns process) and a dashboard for review by the Board, to proactively monitor providers with quality concerns within the Framework. The QACMF also provides methods to de-escalate providers as they demonstrate tangible improvements through the quality assurance process.

6.13.6. As highlighted above, the contract management elements of the QACMF will build on the KPI-setting work of the current Commissioning team, and will support proactive contract management of providers who support twenty or more clients, have an annual spend of £500k per year or more, or who fit both of these criteria.

6.13.7. Within the Residents & Community deliverables, a Commissioning Co-Production Board has recently launched. One of its first tasks will be to establish how the resident voice will be proactively involved in both Contract Management and Quality Assurance. One way the Commissiong Co-Production Board might do this, is by setting up a resident auditing team, to gather information about providers due for their twice-yearly contract monitoring review, or by developing interactive methods of gathering feedback with residents using statutory adult social care services. This might include video feedback, interviews and surveys of people using services and their family carers.

6.13.8. In time, the Commissioning Co-Production Board will also support engagement with residents about how this contract might be re-commissioned in future.

6.13.9. The Finance recommendations of the Peer Review have led to the establishment of the Commissioning Co-Production Board, which, among other things, is responsible for identifying and realising value-for-money in current or future contracts, to maximise use of resources to meet the Council's Care Act duties.

6.13.10. The Commissioning Co-Production Board will keep under review this contract, in consultation with commissioning colleagues who undertake the regular contract management functions with the providers of this contract.

7. Contribution to the Corporate Delivery Plan 2022-2024 High level Strategic outcomes'

7.1. The proposal supports Theme 4 ‘Adults, Health and Welfare’ of the Corporate Delivery Plan 2022/23 and 2023/24 in particular Outcome 1: Healthy and Fulfilling Lives - All adults are able to live healthy and fulfilling lives, with dignity, staying active, safe, independent and connected in their communities.

8. Carbon and Climate Change

8.1. Each contract is restricted to one of three small geographical areas “Localities”; this is designed reduce travel time between homecare visits across the borough.

9. Statutory Officers comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

9.1. Finance

9.1.1. This report is seeking to extend the contracts for a further period of 18 months from 1 April 2024 to 31 August 2025. The cost of extending for an additional 18 months is a maximum of £15,064,919 taking the total contract values to a maximum of £42,786,315. It is anticipated that total spend across the 18-month period will be around £12.3m, based on current client utilisation levels.

9.1.2. The contracts provide statutory services for Adult Social Care clients. There are pressures on existing Adult Social Care budgets, with an overspend of around £13m currently being forecast for 2023-24. The revenue budget proposals for 2024/25 contains growth of £16.247m to address the overall pressures on the care placement costs. There are also plans to mitigate these overspends through a number of savings proposals to deliver a balanced budget that take into account the proposed contract extension.

9.2. Procurement

9.2.1. This provision falls within scope of the Light Touch Regime; Schedule 3 of the Public Contracts Regulation 2015 (PCR) and was duly tendered at the outset via a Dynamic Purchasing System in line with the requirements of the Regulations

9.2.2 Usually, a change in a contract post award requires a new tender process unless it falls within the provisions of Regulation 72 of the PCR. The request for extension may be authorised under Regulation 72.1(a); the extension was provided for as part of the initial procurement in precise and unequivocal terms and did not include provision to alter the nature of the contract.

9.2.3 This request complies with the requirements of CSO 10.02.01

9.2.4. Commissioning reports that providers are delivering satisfactory services that meet contractual outcomes. Moreover, to underpin current practice as set out at 6 above the commissioning team has developed a new contract monitoring framework with specific contract managers to ensure robust contract monitoring and tracking of outcomes and quality standards are met and maintained throughout the remainder of the term along with mechanisms to manage and improve any shortcoming in service delivery.

Importantly, commissioning is also aiming to give voice to service recipients who will also be part of the quality monitoring process and can provide valuable feedback about service delivery, outcomes, and the future direction of this provision

9.3. Legal

9.3.4. The Head of Legal and Governance (Monitoring Officer) has been consulted in the preparation of this report.

9.3.5. The services are Schedule 3 Services for the purpose of the Public Contracts Regulations 2015 (the Regulations) and are above the threshold where the modification rules set out in Regulation 72 applies.

9.3.6. The Council carried out a procurement process for the original contract and its Corporate Procurement Team has confirmed that the original tender included an option to extend for two years. The Council may therefore avail itself of Reg 72 (1) (a) i.e where the modifications were set out in the initial procurement documents in clear precise and unequivocal review clauses including price revision clauses.

9.3.7. Cabinet has power to approve the extension under CSO 10.02.1 (b) (extension valued at over £500,000).

9.3.8. The extension is a Key Decision and, as such, needs to comply with the Council's governance requirements in respect of Key Decisions including publication in the Forward Plan.

9.3.9. The Head of Legal and Governance (Monitoring Officer) confirms that there are no legal reasons preventing the Cabinet Member for Health, Social Care and Wellbeing from approving the recommendations in this report.

9.4. **Equality**

9.4.4. The council has a Public Sector Equality Duty (PSED) under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act;
- Advance equality of opportunity between people who share protected characteristics and people who do not;

- Foster good relations between people who share those characteristics and people who do not.

9.4.5. The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty. Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

9.4.6. This report seeks approval for an 18-month extension to twelve call-off contracts for the provision of bundled hours home support and reablement services. There have been no known equalities-related concerns with the contracts in 2023/24.

9.4.7. An Equality Impact Assessment was completed at the time of the contract award in the original Cabinet Report 'The Award of contract for the provision of bundled hours, home support and reablement service' in March 2020.
The EQIA outlines that the impact of the contract awards is positive as they aim to improve the quality of home support by delivering an outcomes-focused, person-centred service.

9.4.8. Analysis indicates that the make-up of the home support and reablement cohort remains broadly unchanged since the 2020 Equality Impact Assessment.

9.4.9. As an organisation carrying out a public function on behalf of a public body, the Contractors will be obliged to have due regard for the need to achieve the three aims of the Public Sector Equality Duty as stated above.

9.4.10. Appropriate contract management arrangements are established to ensure that the delivery of the service does not result in any preventable or disproportionate inequality. This involves regular contract and performance monitoring and quality assurance visits.

10. Use of Appendices

10.2. Appendix 1 (exempt) - List of Providers and their contract value.

This appendix contains exempt information under the following category: (identified in the amended schedule 12 A of the Local Government Act 1972 (3)) information in relation to financial or the business affairs of any particular person (including the authority holding that information.

11. Local Government (Access to Information) Act 1985

11.2. None

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Report for: Cabinet, February 6th, 2024

Title: Report seeking permission to use the Osborne Grove building to deliver a night shelter for people rough sleeping until March 2025 and to deliver the service in-house

Report authorised by: Beverley Tarka, Director, Adults Health & Communities

Lead Officer: Terry Dragatis, Implementation Manager, Housing Demand

Ward(s) affected: All

Report for Key/ Non-Key Decision: Key Decision

1. Describe the issue under consideration

1.1. This report seeks Cabinet approval:

- To approve the continued meanwhile use of the Osborne Grove building and development of a night shelter for people rough sleeping on a meanwhile basis while long term usage of the building is considered by the Council.

- To terminate the current Thames Reach contract and to deliver the night shelter service in-house until 31st March 2025

- To re-allocate the approved Thames Reach funding to the proposed in-house service based on the written authority received from DLUHC on the 22nd January 2024

2. Cabinet Member Introduction

2.1. We know that people experiencing homelessness have some of the poorest outcomes of all our residents. They are more likely to be unemployed, have unmet physical and mental health needs, and are at risk of a preventable early death. As a borough, we are committed to ending street homelessness and ensuring that vulnerable people have access to high quality supported accommodation that helps them rebuild their lives after homelessness. The first step of this journey for people is off the street accommodation that allows their needs to be assessed and the most appropriate accommodation option to be

determined. Having a night shelter advances Haringey's ambition to deliver quality services in house that respond to the needs of the boroughs residents who face street homelessness.

3. Recommendations

3.1. To approve the meanwhile use of Osborne Grove Nursing Home, 16 Upper Tollington Park, N4 3EL, as a night shelter to be delivered by Haringey Council, starting in April 2024 until March 2025, whilst options for the long-term use of the building and site are subject to further consideration.

3.2. To terminate the current DLUHC ring-fenced funded Thames Reach Ltd contract and to bring the night shelter service provision in-house.

4. Reasons for decision

4.1. The London Borough of Haringey is committed to utilising assets in a way that dynamically and flexibly responds to need. The use of Osborne Grove as supported housing commenced in 2020 in response to the COVID-19 pandemic and the Government's *Everyone In* directive to accommodate everyone at risk of rough sleeping. This was a valuable, positive and cost-effective use of the building, and the service was mobilised at pace to minimise any risk of transmission in this vulnerable cohort.

4.2. London Borough of Haringey was awarded £3,871,429 in the Rough Sleeping Initiative 2022 – 2025 (See Appendix 2). Of this £1,194,188 of this provision was awarded on the basis of the borough providing a night shelter. Thames Reach were identified as a partner organisation in the original report approved by Cabinet Member on 22/8/22 and due to them delivering the existing Haringey Street Outreach Team, it was felt that it made sense for them to also deliver the night shelter accommodation. An additional £230,000 was awarded to fund the fit out of a suitable building as a night shelter. The previously identified building at the Clarendon Recovery College did not become available within the required timeframe and the Council was then unable to meet this commitment. Due to the delay there was a significant risk that the Council would not be in a position to deliver a night shelter at all, which could have led to the council being asked to return the grant. Instead, approval was sought from DLUHC to deliver the service in another building and change from a commissioned provider model to self-delivery. Written confirmation was received from DLUHC on 22/01/24 to proceed on that basis. (See Appendix 3)

4.3. Over the course of the last year the borough has seen a significant increase in the number of people rough sleeping, with numbers on the streets not seen since 2018. The Department of Levelling Up, Housing and Communities

(DLUHC) considers Haringey a borough of concern due to the higher number of people rough sleeping when compared with boroughs of a similar size. Repurposing the existing service as a night shelter would create nearly 35 beds of off the street accommodation, giving a safe and stable accommodation option whilst work is done to identify appropriate move on into other pathway accommodation services.

4.4. The Osborne Grove building is currently in meanwhile use as a supported accommodation service and already has a team in place. This proposal ensures that there is no gap in provision for people experiencing single homelessness while discussions are held on the long-term use of the building and the cohort it should accommodate. The Capital Projects and Property Team have confirmed that there is no other alternative meanwhile use of the building. It is considered that there will not be a longer term application deliverable over the proposed meanwhile use period. This request has also been considered using the Corporate Property Model's Asset Performance Assessment.

4.5. The benefit of delivering the service in-house will be a streamlined recruitment process. Osborne Grove already has the majority of a staff team in place, though there are some vacant posts that would be filled by any TUPE'd staff. The TUPE liability only applies to two members of staff within Thames Reach. The team at Osborne Grove are already familiar with the client group, as well as having an excellent grasp of existing Council processes and services. Additionally, they have an understanding of the wider supported accommodation pathway and move on options, which is fundamental to delivering a successful night shelter. What's more, delivering the service in house will ensure enhanced continuity of support to those accommodated temporarily in the night shelter as they move on into more settled forms of accommodation provided by the Borough.

4.6. The Housing Related Support Team would be able to deliver the service for comparable staffing costs as Thames Reach but with the additional benefits of being able to repurpose additional funds to add an additional case coordinator to the team. It would also prevent the loss of an experienced staff team and the additional liability of severance pay.

4.7. Delivering the service in-house is income generating for the Council through the collection of rent and service charges. These projections are shown in Appendix 1. - Part B (exempt information). We have confirmed with Haringey Benefits Service that the change of use of the building would allow it to be classified as an LA Hostel as defined by HB Regulations 2006. Under those regulations there are three criteria that must be satisfied for the building to be classified as a LA Hostel: (a) the building comprises non-self-contained accommodation and is not a care home, (b) the service either provides food or has adequate facilities

for the preparation of food, and (c) the claimant receives care, support, or supervision that is “more than minimal”. The proposed scheme would satisfy all these criteria. Moreover, the council would cease to be capped to 2011 level of Local Housing Allowance (LHA).

4.8. The Rough Sleeping Initiative (RSI) additional grant of £230,000 will be part spent on essential repairs and maintenance in advance of the building opening and during running. It is currently estimated that we will spend approximately £60,000 for building mobilisation. Any balance remaining from the £230,000 element of the grant can be transferred to form part of the services revenue funding. The modelling of this is contained in Appendix 1. This offers value over continuing to commission the service which would incur additional costs around staffing that would use the whole of the available grant but not generate any surplus which would be used to offset maintenance costs in the building, or alternately where the lease was to cover maintenance, would likely require additional funding from the council. This is currently not identified. Insourcing this service would align with the council policy of insourcing services where it makes sense to do so.

4.9. This option is cost neutral to the Council. Ring-fenced grant funding is available via the Rough Sleeping Initiative to deliver a night shelter at Osborne Grove until March 2025. It’s very likely that this grant funding would continue to be made available after March 2025. Haringey have a track record of successfully delivering services as a result of grant funding allocations, and it is important that we are able to deliver a night shelter following the inability to deliver a service at the Clarendon Hub due to delays at Canning Crescent which was supposed to have been ready to allow the decant of the services based at the Clarendon Hub which would in turn allow building works at Clarendon to start. The issues at Canning Cresent are still to be resolved which has led to the Housing Related Support (HRS) service considering alternative buildings. As a result of the short-term nature of the funding and proposed use to March 2025, we do not think any alternative meanwhile use could be operationalised in a way or timescale that would be beneficial to the Council. DLUHC have confirmed in writing that there would be no impact on the grant awarded if LBOH took the decision to insource this service complying with Annex D of the grant terms & conditions.

4.10. If the building were to be emptied and remain empty until the next use was determined there would be a cost associated with building security as well as the continued cost of building compliance works. This cost is hard to specify and would depend on the level of security needed. A conservative estimate for this would involve once daily visits by a mobile security operative and Sitex on the ground floor doors and windows which would cost approximately £33,560 per annum. This would increase significantly if the first-floor windows were

covered too. These figures are based on publicly available information and information provided by the councils preferred security firm.

4.11. The current shortage of affordable nightly paid accommodation in the Borough has resulted in additional financial pressures for the Council. This forms the rationale for the proposed £3.0m growth in budget for Temporary Accommodation in 2024/25 as brought to Cabinet in December 2023. Delivery of a night shelter at Osborne Grove whilst it does not form part of that growth, a night shelter will, however, help to alleviate demand for short-term temporary accommodation including commercial hotels for single adults.

4.12. A Night Shelter provision at Osborne Grove would allow us to accommodate people who currently have No Recourse to Public Funds (NRPF). Haringey currently has a very high proportion of people rough sleeping with NRPF. Often, this cohort has significant mental or physical health needs which are unmet while street homeless. When left street homeless for months or years, these needs tend to escalate and often this results in pressure on expensive services elsewhere in the NHS or Council, including on Adult Social Care. There is strong evidence to show that those who are brought into accommodation are quickly supported to regularise their status and source appropriate accommodation.

5. Alternative options considered.

5.1. Cabinet could choose to not agree with the request for the repurposing of Osborne Grove. This would likely result in the building continuing in its current use as supported accommodation, but this would explicitly mean that the council continues to lack appropriate off the street accommodation for people rough sleeping in the borough and would also potentially lead to DLUHC asking for the awarded grant money to be returned. This could also cause some reputational damage with DLUHC as Haringey has already been flagged as a borough of concern due to the number of people rough sleeping and there would be challenging questions as to why we chose not to make use of an existing building and awarded grant in a way that could positively impact this.

5.2. Cabinet could choose not to bring in-house the commissioned Thames Reach night shelter service. The quote received from Thames Reach would be met by the grant but does not include the cost of maintenance. These costs would likely continue to be met by LBOH or a negotiation would need to take place with Thames Reach about these costs being met by them. This would take some time and adds a risk of the delivery date slipping significantly. As there would be no TUPE obligations on Thames Reach if they were to start delivering the night shelter out of Osborne Grove it would likely lead to job losses in the existing team at Osborne Grove and acting as an experience drain in a situation

where a new team would need to get up to speed quickly around the different processes and accommodation options in the borough. Generally, embedding a new service takes between 3-6 months, which would leave only 6 months remaining on the contract. There would also be challenges around decanting the existing building to a fixed handover date which would add additional pressure to the pathway which is already near capacity.

5.3. The Council could choose to continue using The Shelton Hotel as off the street accommodation. Accommodation provision in commercial hotel accommodation offers less than optimal value for money and can impact on health, wellbeing and support outcomes for residents. In addition, the lack of dedicated office space for support staff on site and the layout of the building makes delivering support difficult. In comparison, the cost to accommodate 15 people at any time in the Shelton Hotel would allow the council to offer 35 bedspaces in Osborne Grove. There are also significant community and police concerns around anti-social behaviour (ASB) emanating from the hotel and its commercial function. It is in the Council's interest to cease use of Shelton Hotel at the earliest opportunity.

6. Background information

6.1. Building & Service

6.1.1. Osborne Grove is a now-decommissioned nursing home, which was run by the Council until 2020, located on Upper Tollington Park, Finsbury Park.

6.1.2. Osborne Grove comprises 35 individual rooms and is currently being used by the Housing Related Support Team as a single homeless supported accommodation site.

6.1.3. Prior to its full closure as a nursing home, the Council agreed via a Cabinet decision in July 2019, to recommission a new nursing home service on the site, demolishing the current two-storey building and replacing it with a 4-storey 70-bed nursing home and an 18 extra-care studio-flat facility.

6.1.4. Since that decision in 2019, the council has been working on designs for the building. The Housing Related Support Service has run the site as supported accommodation offering 35 bedspaces for single adults facing homelessness. The focus of the work in the service is on supporting its residents to address the issues they face and to move away from homelessness. The intent is for people to move on from the service after 2 years, though this always depends on individual's needs.

6.1.5. The last year has seen the numbers of people rough sleeping in the borough increase dramatically. The council secured funding through the Rough Sleeping Initiative (RSI) to open a Night Shelter and a building currently housing Clarendon Recovery College was identified as suitable for adaptation. Thames Reach were the named provider as part of the bid to DLUHC for the Rough Sleeping Initiative grant funding. The works on Clarendon were held up behind development on a building at Canning Crescent due to a contractor ceasing trading. The timeframe for finalisation of works at Canning Crescent remains uncertain. The main implication of this is that there is a risk of the DLUHC seeking the return of this grant if is it is not used for the purposes for which it was awarded.

6.1.6. Whilst the Clarendon building was unavailable, Thames reach delivered a floating night shelter service out of a commercial hotel. The smaller staffing model required for a floating support service allowed for the funds not spent to be used to block book rooms at the hotel.

6.1.7. When it became clear that the original timeframe for the works to be finished at Clarendon was unrealistic, alternative options were explored. Through previous conversations with the Strategic Property Team no other suitable buildings were available within the required timeframe. Future decision making around the long-term use of the building will take into account the principles of the SAMPIP and the Corporate Property Model and will be set out clearly for stakeholders, residents and partners.

6.1.8. The intent for the Night Shelter is as “off the street” accommodation, which is provided as a first step for people currently rough sleeping in the borough including some people who currently have no recourse to public funds. Though the proposed new service will be working with people experiencing homelessness the focus will move to rapid assessment and move on. Staff will work assertively with people accessing the service to identify the most appropriate move-on option for them. Where people do not have recourse to public funds, they will be provided accommodation for up to 12 weeks so their situation can be investigated and if they are eligible, to be supported to make applications or access specialist support and advice to normalise their right to reside in the UK. We do not see there being any material change for neighbours of the service.

6.2. **Finances**

6.2.1. Please see Appendix 1– Part B (exempt information) of this report. Appendix 1– Part B (exempt information) contains the financial modelling of the proposed service.

6.2.2. The Housing Related Support team has spent the available grant in 2022/23 except from the funding awarded to refurbish a suitable property. That funding of £230,000 was accrued in 2022/23 to be available to spend in 2023/24. March 2025 is the end of the current RSI funding period at that point the service will review the availability of the building and meanwhile use and the viability of continuation of the night shelter.

6.2.3. As the capacity of the service would change from 15 people currently being supported out of a commercial hotel) up to 35 in Osborne Grove, Thames Reach were asked to update their quote for managing the service. The quotes submitted by Thames Reach was higher than anticipated (quotation amount is in (Appendix 1 - Part B (exempt information) of this report), due to the larger size of the proposed service and increased expected costs. This quote didn't include allowance for maintenance costs. If these were included, it would likely see an increase in the price quoted. It also supposes that Thames Reach would collect the rent on the building.

6.2.4. After looking at both the finances and the wider context, the service has concluded that the council would be best placed to deliver this service itself. LBOH would have comparable staffing costs to Thames Reach on this site but with the benefit of an existing staff team already in place and with a management team who are experienced working in this field as well as within Haringey and who understand the supported accommodation pathway and the processes around accessing it. The service has also considered how to add further value to the service via in house delivery. By repurposing RSI grant funding for 2 currently vacant move-on roles, the service is able to add a specialist case co-ordinator role to service.

6.2.5. Rough Sleeping Initiative award summary showing the amount awarded for each year of the current RSI grant settlement for the purpose of the night shelter as well the funds we are intending to repurpose to add a Case Coordinator role to the service. Please see Appendix 1 - Part B (exempt information) of this report.

6.2.6. DLUHC have confirmed that they would be happy for the council to use all or any part of the additional grant awarded as revenue for the service. With the additional money from this and the repurposed grant money for the Case Coordinator role the services operational costs are higher than the quote provided by Thames Reach. There would still be no cost implication for LBOH outside of the central repair costs already identified. As mentioned previously there will be a modest income generated through collection of Housing Benefit.

6.2.7. There is no additional risk or liability to LBOH if the council were to deliver this service in house. DLUHC have confirmed they are happy for the council to do this and that there would be no impact on the grant offered (see Appendix 3). Insourcing the service would be subject to "Transfer of Undertakings (Protection of Employment) Regulations 2006 in respect of existing Thames Reach staff.

6.3. **Decant & Exit Plans**

6.3.1. If Cabinet approves this report the intent is for a phased decant of the existing service, starting in February 2024 and progressing through to the change of service in April 2024. Residents currently in the Osborne Grove service who have recourse to public funds, of which there are approximately 25, would be considered for voids elsewhere in the supported accommodation pathway and would be on an individual basis based on peoples' specific needs. The Housing Related support Team has already started identifying voids in the pathway and likely move on options. Following successful bids to the Single Homeless Accommodation Programme we expect another 30 or so voids to be available starting in mid-March 2024 so there should be no difficulties in achieving this. Current residents who have no recourse to public funds (NRPF) will form part of the initial cohort for the service and stay in place. Current residents at the Shelton Hotel will be decanted on a phased basis as voids are made available at Osborne Grove.

6.3.2. There is a chance that in March 2025 the next phase of the development of the Osborne Grove site will not be ready to begin and that the night shelter is able to continue in place for a longer period. 2025 will see the next 3-year Rough Sleeping Initiative funding settlement and it is highly likely that money would be available for the continuation of the night shelter service if the building was still available. If it was the case that the next phase of the Osborne Grove redevelopment was ready, and the service needed to be decanted the Housing Related Support service has a proven track record of decanting buildings post covid when we successfully moved on over 400 people as the "everybody in" directive was ended. We would be looking to begin this process at least 3 months out from the end of service date to identify suitable move-on options for people in time.

7. **Contribution to the Corporate Delivery Plan 2022-2024 High level Strategic outcomes'**

7.1 This proposal would help us to meet High Level Outcome 1 in the Corporate Delivery Plan 2023 – 2024: Healthy and Fulfilling Lives - All adults are able to live healthy and fulfilling lives, with dignity, staying active, safe, independent

and connected in their communities. Specifically, the intermediate outcomes that:

- There will be a co-ordinated and compassionate response for single adults who are facing homelessness.

And that

- There will be a decrease in rough sleeping in the borough.

8. Carbon and Climate Change

8.1. From a carbon management perspective reuse of an existing building is likely to be the preferred option for a night shelter in the short-to-medium term. Unfortunately, the meanwhile use of Osborne Grove and limited budget available precludes any significant capital works to reduce carbon equivalent (CO_2e) emissions.

8.2. Retrofitting insulation to the external walls of the building would likely be the most effective way to reduce CO_2e emissions; however the short lifetime of the night shelter means that the total impact would be relatively low, cause significant disruption for residents, and not be cost-effective for the Council.

9. Statutory Officers comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

9.1. Finance

9.1.1. The decision to bring in-house the currently commissioned Thames Reach night shelter service and instead use Osborne Grove to provide this service will result in limited risk to the council.

9.1.2. Firstly, the security costs of £33,850 will only be incurred if the facility remains empty; this is an unlikely scenario and there is confirmation from Capital Projects and Property teams of no future plans for which Osborne Grove will be utilised.

9.1.3. Existing staffing with the addition of two new roles is assumed to be sufficient for the function of the night shelter. The new roles will not result in any further staffing expenditure as these positions will be a repurposing of existing posts already in place. In addition, staffing costs is expected to be £695,966 per annum (Appendix 1, Part B). This is a conservative estimate as staffing have

been costed to the top of their grades and can safely assume that actual costs will be lower.

9.1.4. The main risk to the council, is the cost associated with the compliance and maintenance i.e. repairs, gardening etc. The sum of these charges can be as high as £38,000 per annum, however, if external contractors are used there is an expectation that these costs will be lower than what has been incurred recent years.

9.1.5. A further £230,000 has been awarded for use of any Capital works necessary; current projections show that only £60,000 of this grant will be utilised for capital works, leaving £170,000 spare. DLUHC have confirmed in writing that any unspent monies can be re-categorised to offset revenue expenditure.

9.1.6. Due to the ability to redistribute Capital grant money and that staffing costs can be expected to be lower than projected, it is expected to breakeven or better. Further analysis is required to see if there is unspent grant.

9.1.7. Finally, the Rough Sleeping Initiative will fund the expenditure associated with this project to 2025, when the funding source may be revisited, however, this funding stream is likely to go further than the timeline mentioned.

9.2. Procurement

9.2.1 Strategic Procurement notes the content of this report. There are no procurement ramifications

9.3 Head of Legal & Governance

9.3.1 The Head of Legal and Governance (Monitoring Officer) has been consulted in the preparation of this report. The process described in the report is in line with the Council's Contract Standing Orders (**CSOs**) and Public Contracts Regulations 2015.

9.3.2 The DLUHC has provided a ring-fenced grant on condition that the monies are used for the sole purpose of providing Rough Sleeping Initiative funded services. Agreed grant funding conditions set out by the DLUHC require the sums to be spent to intervene, prevent and reduce rough sleeping in the fiscal years 2022/23 to 2024/2025. If repurposing of funding is required, the authority is required to seek prior written approval to agree where services need to change to best meet need and end rough sleeping in Haringey.

9.3.3 The Cabinet is being asked to approve the termination of the current DLUHC grant funded Thames Reach Ltd contract, to allow for the transfer of the service provision to be brought back “in-house” and delivered by Osborne Grove Nursing Home, 16 Upper Tollington Park, N4 3EL, as a night shelter to be delivered by Haringey Council until March 2025.

9.3.4 Section 1 of the Localism Act 2011 provides the Council with the power to do anything that individuals generally may do. This power can be used for commercial purposes or otherwise for a charge, or without a charge. The Council may exercise this power for the benefit of the authority, its area, or persons resident or present in its area. It should be noted that the implementation of this decision is subject to the community right to challenge under the Localism Act.

9.3.5 Section 111 of the Local Government Act 1972 provides powers for a local authority to do anything (whether or not involving the expenditure, borrowing or lending of money or the acquisition or disposal of any property or rights) which is calculated to facilitate, or is conducive or incidental to, the discharge of any of their functions.

9.3.6 Under section 3 of the Local Government Act 1999 the Council has a general ‘best value’ duty to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.

9.3.7 The report confirms discussions are taking place with Thames Reach to explore transferring their staff to Osborne Grove. On insourcing, staff are entitled to the rights and protections of TUPE (The Transfer of Undertakings (Protection of Employment) Regulations 2006). Qualifying staff will transfer over to the Council on their existing terms and conditions and strict duties and obligations imposed on the Council as the receiving employer. Officers managing this project are advised to ensure that the TUPE transfer is managed in accordance with the advice and guidance of HR and Procurement colleagues.

9.4. **Equality**

9.4.1. The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.

- Advance equality of opportunity between people who share those protected characteristics and people who do not.

- Foster good relations between people who share those characteristics and people who do not.

9.4.2. The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status apply to the first part of the duty.

9.4.3. Although it is not enforced in legislation as protected characteristics, Haringey Council treats socioeconomic status as a local protected characteristic.

9.4.4. As part of the council's Rough Sleeping Strategy (2023-2028) a comprehensive Equalities Impact Assessment was carried out to help identify how those who are rough sleeping in Haringey compared more broadly to the average across all the data collected on Combined Homelessness and Information Network (CHAIN). Data held by the Council suggests that women, Black communities, those who identify as LGBTQ+ and disabled individuals are particularly vulnerable to homelessness, as detailed in the Equalities Impact Assessment of the Council's Homelessness Strategy.

9.4.5. This decision seeks to reverse a previous decision to award a contract to Thames Reach, bringing the management of the service in-house. Additionally, it seeks to approve the use of the Osborne Grove Nursing Home building as a night shelter for people experiencing rough sleeping.

9.4.6. There are neutral impacts of bringing the service in-house on the service users. People at the existing service who have recourse to public funds will be supported to move on into another pathway service or if appropriate their own independent accommodation. Those that currently do not have recourse to public funds will stay and form part of the cohort of the night shelter when it opens.

9.4.7. Overall, the service is likely to have a positive impact on individuals who are vulnerable to homelessness. Additionally, moving the service to Osborne Grove will allow more people to be accommodated. As such, it is reasonable to anticipate a positive impact on residents with protected characteristics who are overrepresented in the homeless population. This will help the Council to meet its equalities duties and address known inequalities affecting individuals with protected characteristics, in particular relating to age, sex, sexuality,

gender identity, race, and disability. Accordingly, the decision represents progress to eliminate discrimination and advance equality of opportunity.

9.4.8. The council already has policies in place in relation to equal opportunities and equality and diversity as well as compliance with the Equality Act 2010.

9.4.9. Protected characteristics are tracked on the CHAIN database case management and monitoring application on a monthly basis.

10. Use of Appendices

10.1. Appendix 1 – PART B Exempt Information

10.2. Appendix 2 – DLUHC letter – additional funding - Exempt

10.3. Appendix 3 – DLUHC letter 22.01.2024 Exempt

11. Background papers

11.1. Cabinet Report – Approval of Receipt of Grant from RSI 22 – 25.

11.2. Local Government (Access to Information) Act 1985

11.3. This report contains exempt and non-exempt information. Exempt information is contained in the exempt report and is not for publication. The exempt information is under the following category: (identified in the amended schedule 12 A of the Local Government Act 1972 (3)) information in relation to financial or the business affairs of any particular person (including the authority holding that information.

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Report for: Cabinet - 6th February 2024

Title: Acceptance of LAHF R2 grant funding to acquire 30 new Homes.

Report authorised by: **David Joyce, Director of Housing, Regeneration and Planning**

Lead Officer: **Robbie Erbmann, Assistant Director of Housing 020 8489 1784**

Ward(s) affected: All

Report for Key/ Non Key Decision: **Key Decision**

1. Describe the issue under consideration

1.1. This report recommends accepting grant of capital allocation of £7,644,000 from the DLUHC LAHF2 programme that has been awarded to support an acquisition programme of up to 30 homes.

1.2. The Forward plan entry is amended to the above to reflect the additional £2,548,000 that has been secured to acquire another 10 homes.

2. Cabinet Member Introduction

2.1. Haringey is a welcoming and inclusive place for people from all cultures, nationalities and backgrounds who want to live and work here. Throughout our borough's history, Haringey has been proud to offer a new home to people fleeing violence and persecution. We are continuing this proud tradition by offering homes to people who have been forced to flee Afghanistan by years of war and human rights abuses.

2.2. To support our commitment to welcoming these Afghan families, I am delighted to have secured £7,644,000 from the Government's Local Authority Housing Fund. This grant will support our delivery of up to 30 new homes which could help to give a new start to 30 families, letting them put down roots and flourish - contributing to the Haringey community. In turn,

these additional homes will free up temporary and emergency accommodation, helping ease wider homelessness pressures.

3. Recommendations

It is recommended that Cabinet:

3.1. In accordance with Contract Standing Order 17.1 and Contract Standing Order 9.07.1(d), approves the acceptance of capital grant from DLUHC LAHF2 funding, the terms of which are summarised below in part 6.

3.2. Delegates authority to agree the final grant documentation and contracts to the Director of Housing, Planning and Regeneration, after consultation with the Director of Finance and the Head of Legal and Corporate Governance (Monitoring Officer).

3.3. Delegates authority to agree further tranches of the grant funding to the Director of Housing, Planning and Regeneration, after consultation with the Director of Finance and the Head of Legal and Corporate Governance (Monitoring Officer).

4. Reasons for decision

4.1. to providing housing and support for vulnerable residents in the Borough. This decision is an important step in achieving that aim.

4.2. accepting this grant is an opportunity to lever more funding into our programme - which will mean overall the council will be able to deliver more homes for rent.

5. Alternative options considered

5.1. To use Right to Buy receipts to fund the acquisitions programme. The grant associated with DLUHC funding represents lower acquisition and borrowing costs to the Council, so the Council would prioritise the use of the DLUHC grant funding in the first instance.

6. Background information

6.1. LAHF R2 is a £250m capital grant fund to provide sustainable housing for those on Afghan resettlement schemes and ease wider homelessness pressures.

6.2. DLUHC originally accepted the Council's plan to provide 20 homes ('the delivery target') under LAHF R2, and DLUHC will provide a grant of £5,096,000 ('the total allocation'). The Council agreed to deliver at least: 2 properties for households that meet the resettlement scheme criteria and 18 properties to be allocated to households that meet the TA criteria.

6.3. Further funding of £2,548,000 has been allocated to deliver an additional 10 properties to be allocated to households that meet the resettlement scheme criteria.

6.4. The funding will part fund the cost of the Council obtaining properties and carrying out void works. Eligible costs include the purchase price, stamp duty, surveying, legal and other fees, refurbishments, energy efficiency

measures, decoration, furnishings, or otherwise preparing the property for rent and potentially irrecoverable VAT incurred on these items.

6.5. The funding conditions relate to achieving milestone dates and ensuring a legal interest is secured in the properties by March 2024. Grant conditions are shown in the DLUHC's grant funding Memorandum of Understanding (MOU) agreement attached as Appendix 1 and further information is available online at https://www.gov.uk/government/publications/local-authority-housing-fund-round-2/local-authority-housing-fund-round-2-prospectus-and-guidance.

6.6. The acquisition programme for 2023/24 has delivered 22 properties to date and anticipate completing on at least 9 eligible properties to the end of March 2024.

7. Contribution to the Corporate Delivery Plan 2022-2024 High level Strategic outcomes'

7.1. The proposal would help to meet the following outcomes within the Council's Corporate Delivery Plan 2023 – 2024: Theme 5 - Homes for the Future - *Everyone has a home that is safe, sustainable, stable, and affordable.*

7.2. An improvement in the quality of housing and resident services in the social rented sector. The properties to be acquired will undergo works to ensure they meet decent homes standards and energy efficient measures are undertaken where possible.

7.3. Increasing the quality of temporary accommodation supply within the Council's control to provide safe and affordable supply options and tackle problematic and unsafe exempt accommodation and private hostels.

8. Carbon and Climate Change

8.1. The acquisition properties will undergo void works that incorporate energy efficiency measures where required. As well as reducing the running costs for the tenants moving into these homes, the improvements will contribute to the council's net zero ambitions by improving the energy efficiency and sustainability of its stock.

9. Statutory Officers comments

9.1. Finance

9.1.1. The total grant awarded (£7.64m) for 30 homes represent a grant of £254,800 per unit, towards the acquisition of homes for temporary accommodation and Afghan resettlement scheme.

9.1.2. The acquisition of these homes, and its implication have been assessed within the HRA financial model.

9.1.3. Finance is satisfied that the acquisition of these homes, with this level of grant, can be contained within the current HRA budget/MTFS.

9.1.4. It was expected that subject to acceptance of the award, the grant will be paid. However, part of this grant, £5.09m, has already been paid by DLUHC.

9.1.5. This will help in facilitating the acquisition of these homes and minimise the need for initial borrowing.

9.2. Procurement

9.2.1. Strategic Procurement notes the contents of this report and confirms there are no procurement related matters preventing Cabinet from approving the Recommendations in paragraph 3 above

9.3. Head of Legal & Governance (Oliver Higgins, Principal Lawyer)

9.3.1. The Head of Legal and Governance (Monitoring Officer) has been consulted in the preparation of this report.

9.3.2. Pursuant to Contract Standing Order 17.1 and powers under the Constitution the Cabinet has authority to approve the recommendations in the report.

9.3.3. The Head of Legal and Governance (Monitoring Officer) sees no legal reasons preventing Cabinet approving the recommendations in the report.

9.4. Equality

9.4.1. The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

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

9.4.2. The three parts of the duty applies to the following protected characteristics: age disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex, and sexual orientation. Marriage and civil partnership status apply to the first part of the duty.

9.4.3. Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

9.4.4. The decisions in this report are designed to accept a grant through the DLUHC LAHF R2, which will put in place appropriate financial arrangements to help to increase the supply of homes which are genuinely affordable to residents by acquiring new council-rented homes.

9.4.5. This decision is likely to positively impact individuals in unsuitable temporary accommodation and those who are vulnerable to homelessness. Data held by the council suggests that women, young people, those from a lower socioeconomic background and Black, Asian and Minority Ethnic (BAME) people are over-represented among those living in temporary accommodation. Furthermore, individuals with these protected characteristics, as well as those who identify as LGBT+ and disabled people, are known to be vulnerable to homelessness. As such, it is reasonable to anticipate a positive impact on residents with these protected characteristics and that this decision will positively advance the public sector equality duty in Haringey.

9.4.6. Additionally, it is noted there are no negative impacts on those with protected characteristics expected from these decisions.

10. Use of Appendices

10.1. Appendix 1 – LAHF Round 2 MOU. (This is exempt under section 12a of the local government act 1972 in particular paragraph 3). defined under paragraph 3 , Part 1, Schedule 12A of the Local Government Act 1972:Information relating to the financial or business affairs of any particular person (including the authority holding that information).

11. Background papers

11.1. There are no background papers for this report

12. External Links:

12.1. The DLUHC funding prospectus for the grant funding

- https://www.gov.uk/government/publications/local-authority-housing-fund-round-2/local-authority-housing-fund-round-2-prospectus-and-guidance.

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Report for: Cabinet – 6th February 2024

Title: Acquisition of 10 Gourley Street, N15 5NG

Report authorised by: David Joyce, Director of Placemaking and Housing

Lead Officer: Mark Leeson, Capital Projects and Property

Ward(s) affected: Seven Sisters

Report for Key/ Non-Key Decision: Key

1. Describe the issue under consideration

1.1. This report seeks approval for the acquisition of a property located at 10 Gourley Street, N15 5NG ("the Property") and shown edged red on the Site Plan attached at Appendix 1.

2. Cabinet Member Introduction

The Gourley Triangle is a key strategic site for the Council. Our desire to maximise the number of high-quality council-rented homes and affordable housing on the Gourley Triangle, alongside the current high cost of construction, means that the Council must pause the planned development for the next two to three years. Despite this delay, these acquisitions must continue if we are to proceed with the masterplan for this site in the future.

As a Council, we have made a long-term investment in acquiring this site, spending more than ten years engaging with third party owners to bring forward a viable whole site scheme. This has proved challenging given the complex multiple ownership interests however the Council now owns approximately 80% of the freehold interests.

The site is to be acquired utilising Future High Street Fund monies, provided by the Department for Levelling Up, Housing & Communities. This funding is available for land assembly purposes and is not tied to any future development activity on the part of the Council. Until the planned redevelopment is ready to continue, the meanwhile rental income from the building will cover holding costs, making this a sound financial investment.

3. Recommendations

3.1. It is recommended that Cabinet agree to:

a) the acquisition for planning purposes of the freehold interest in the property known as 10 Gourley Street, N15 5NG for the price and based on the Heads of Terms detailed in the exempt part of this report;

b) grant a lease back of 10 Gourley Street on completion of the acquisition to the seller for a term of six months; and

c) delegate authority to the Director of Placemaking and Housing, in consultation with the Director of Finance and the Cabinet Member for Council House Building, Placemaking and Local Economy, to agree the final contract terms for the acquisition of the Property on the basis noted in Recommendations 3.1(a) and (c) in the exempt part of this report.

4. Reasons for decision

4.1. The Property sits within the Gourley Triangle site. The Gourley Triangle site is a key redevelopment site close to Seven Sisters underground and overground stations. It is promoted through the Tottenham Area Action Plan (TAAP) as a site with the potential to deliver high quality employment space and residential, including Council rented homes. The site also forms part of the Tottenham Creative Enterprise Zone.

4.2. The delivery of a comprehensive redevelopment scheme at Gourley Triangle is challenging owing to the variety of ownerships of properties within it. The Council has spent more than ten years engaging with third party owners in an attempt to bring forward a viable whole site scheme.

4.3. The Council has developed a masterplan for the site but given significant recent increases in construction costs, cost of site assembly in relation to the masterplan proposals and quantum of affordable housing requirement it is currently unviable. Reflecting the current economic situation, it is unlikely that development of the Gourley Triangle will commence within the next two to three years. However, that does not mean that the land assembly exercise must be halted.

4.4. As it stands however, the Council is in receipt of Future High Streets Fund (FHSF) (via DLUHC) monies that can be applied to the acquisition of properties within the Gourley Triangle site area for land assembly purposes. The FHSF monies can be applied to properties that sit within a defined area that not only includes high street facing properties but also those within its immediate hinterland. A plan showing the area boundaries to which this funding may be applied is attached as Appendix 3.

4.5. Council officers contacted third party owners to discuss their appetite to sell at this time. Heads of terms have been agreed in respect of this Property only (other owners were either unwilling to contemplate a disposal or terms could not be agreed). These heads of terms are attached as Appendix 2 (Exempt). 10 Gourley Street represents an important acquisition in terms of site assembly for the future redevelopment of the whole site in due course.

4.6. Given that this larger ambition is currently on hold, it is however imperative that the purchase is also able to justify itself as a viable acquisition in its own right and that the price paid represents value for money. An RICS Red Book valuation has been commissioned and the acquisition is conditional upon this valuation supporting the purchase price.

4.7. Council officers consider, having taken third party commercial property advice and subject to satisfactory results from the due diligence to be/being undertaken (surveys, title etc), that the acquisition of this Property at the price agreed and utilising FHSF monies represents value for money. The Council is still committed to the long term regeneration of the area, for which it has been land assembling. Until current economic conditions change to allow the Council to proceed with the long term master plan for the site, this acquisition represents a sound investment for the Council as rental income will cover holding costs. This is supported by the fact that this is an industrial property of a size and inner London location of which there is limited supply and strong occupier demand.

4.8. 4.8 to 4.12 This information is contained in the exempt report.

5. Alternative options considered.

To not proceed with this acquisition

5.1 The Council could choose to not proceed with this proposed purchase. In this event, the Council may face the prospect of having to repay the FHSF monies already paid to it. In addition, it would forego the opportunity to secure a property for future regeneration purposes.

6. Background information

Property Description

6.1. The Property is a freehold two-storey industrial building of brick and corrugated metal profile construction with an adjoining small single storey building. To the rear of the building is a gated alleyway with shared access to both the Property and a neighbouring industrial unit. It is located within the borough and within the Gourley Triangle, a site long earmarked and promoted by the Council for comprehensive regeneration. The triangle site is located about 300m southwest of Seven Sisters station.

6.2. The main building comprises approximately 10,440 sq. ft. (969.9 sq. m.) and there is a rear storage building of about 753 sq. ft. (70 sq. m.) on a site of 0.155 acres (0.06 ha). The Property is currently occupied by the freeholder who will take a six month leaseback following completion to enable it to decant its operation to alternative premises. It has a current EPC rating of B which, of itself, signifies that no additional works are required to improve the environmental efficiency of the unit in order to secure future lettings according to the current interpretation of HM Government's anticipated requirements. The Property appears to be in good overall condition nevertheless it is recognised that it was constructed in the 1970s/80s. Thus, any acquisition by the Council upon the financial terms agreed

with the seller will be conditional upon satisfactory results from surveys that cover building condition, asbestos, below ground drainage and site environmental matters. These surveys have been commissioned.

Gourley Triangle Regeneration

6.3. For more than ten years the Council has been engaging with property owners on the site in an attempt to bring forward a comprehensive mixed use development scheme. This has proved challenging given the complex multiple ownership interests however, as it stands, the Council owns approximately 80% of the freehold interests (most of which have been leased under varying terms). In March 2022, the Council's Cabinet approved a budget sum for the acquisition of third party interests plus a budget to progress the development proposals through to submission of a planning application. This decision was made on the basis that a scheme must be financially viable. Subsequently, on 5th July 2022, Cabinet noted a series of development objectives which guided the preparation of a strategic masterplan for the site and the resultant emerging masterplan indicates the whole site has the capacity to deliver about 236 new homes and circa 4,300 sq. m. high quality employment space within seven main blocks.

6.4. In July 2023 Council officers and their advisors Avison Young carried out a review of the emerging master planned scheme which considered different delivery scenarios. Each of the scenarios modelled indicated the scheme to be unviable given the current economic position and grant arrangements. On this basis, it is considered that progression of the scheme proposals be paused for the next two to three years.

Future High Streets Fund

6.5. The Council has secured external funding from the Department for Levelling Up, Housing and Communities (DLUHC)'s Future High Streets Fund (FHSF). A portion of these monies was spent on the Council's acquisition of the freehold of 8-10 Durnford Street (located within the Gourley Triangle site) in 2022. Following a subsequent review of the overall FHSF budget and spend profile, it was proposed to DLUHC that the entire budget allocation for financial year 2022/23 be allocated to the acquisition of property interests within the Gourley Triangle site. By means of approval from DLUHC to a Project Adjustment Request (PAR), it consented to this allocation of funds on the proviso that, in order to comply with its grant terms, the monies be expended by end March 2024. The PAR and DLUHC confirmation are attached as Appendices 4&5 (Exempt). It further linked the FHSF grant to land assembly, not future development output. There is sufficient FHSF grant to meet the purchase price and associated acquisition costs of the Property. Should there be any remediation costs, these too can be met from the grant.

Future Property Strategy

6.6. The freehold purchase of the Property will be accompanied by a six month fixed term leaseback to the seller (who is currently the owner occupier) in order to enable it to gradually decant its business and relocate to alternative premises.

6.7. During the leaseback period, the Property will be marketed for leasing on commercial terms but any resulting lease terms will be structured to enable the Council to regain vacant possession within a period of approximately five years (most likely via a longer term lease that incorporates break clauses). This will ensure a medium term revenue to the Council whilst retaining the flexibility to incorporate the site within any revived proposals to effect a future, larger scale, regeneration project.

6.8. The freehold interest in the Property is owned by Twin Attitude UK Limited. Terms for the acquisition of the Property have been reached with Twin Attitude UK Limited and is set out in the Heads of Terms (Exempt). The target date for completion of the purchase is 22 March 2024.

Risks

6.9. The acquisition upon the financial terms agreed is dependent upon satisfactory results from building and asbestos surveys in respect of the building itself plus ground condition and below ground drainage surveys. It is also dependent upon a Red Book valuation, to be undertaken by Avison Young, that supports the purchase price. Thus, the risk to the Council is post-acquisition and is in respect of its failure to re-let the Property in a timely manner following expiry of the six month leaseback to the seller. Ownership of a void unit will leave the Council exposed to unrecoverable insurance, security and (after six months) empty rates costs. This void period (and thus risk) can be minimised by utilising the leaseback period to market the property to secure a new tenant. In addition, Avison Young (plus informal advice from another leasing agent) report that a unit of this type, size and location is in short supply and should attract strong occupier interest.

7. Contribution to strategic outcomes

7.1. The Council's 'Haringey Deal' sets out a series of commitments that the Council has made to working differently and building a different kind of relationship with residents and communities and the prospective outcomes are contained within the Council's Corporate Delivery Plan 2022/23 and 2023/24. The revenue receipt will therefore be used flexibly in support of one or more of the following themes:

- Theme 1: Resident experience, collaboration and participation
- Theme 2: Responding to the climate emergency
- Theme 3: Children and young people
- Theme 4: Adults, health and welfare
- Theme 5: Homes for the future
- Theme 6: Safer borough
- Theme 7: Culturally rich borough
- Theme 8: Placemaking and economy

Acquisitions and Disposal Policy

7.2. The Acquisitions and Disposals policy is contained in the Asset Management Plan February 2020 which was updated and adopted by Cabinet in February 2021. The policy sets out key 'Principles' and 'Tests' that determine alignment with the Borough Plan (now superseded by the Corporate Delivery Plan). This transaction aligns with the principles set out within both the Asset Management Plan and SAMPIP.

7.3. The basis for this acquisition has been assessed and found to meet key criteria as set out in the Council's Disposal and Acquisitions Policy. In particular, this acquisition serves the twin objectives of augmenting the Council's ownership position within the Gourley Triangle site whilst representing a viable industrial investment in its own right until such time as a comprehensive whole site regeneration is effected, however long that might take.

Assessment Criteria:	**Test**	**Outcome**
MTFS contribution	Assessed as part of Business Case.	√
Asset Management Plan	Revenue receipt to be spent on Corporate Delivery Plan priorities	√
Business Case	Approved by Finance Department.	√
Deliverability	Terms agreed for acquisition.	√
Valuations/ Development appraisal supports	Red Book Valuation that confirms that purchase price represents Market Value	TBC
Affordability	Purchase price and ancillary acquisition costs wholly funded by FHSF monies.	√
Legal assessment	Approval of Heads of Terms leading to documentation of transaction.	√
Alternative options considered	Only alternative is to not acquire (discussed in paragraph 5.1. of this report).	√
Risk assessment	Risk to Council is inability to lease the unit following expiry of the short term leaseback to the seller. This would result in the Council facing the liability in respect of holding/security/empty rates costs.	√

8. Carbon and Climate Change

8.1. This proposal concerns the forthcoming purchase of an industrial building. The seller is an owner occupier that will remain in occupation for approximately six months post completion of the purchase whilst it decants its operation to an alternative premises. Thereafter, the Council will re-let the premises to an, as yet unknown, future occupier. Thus, the future use to which the building will be put is unknown. At the point of sale, there will be no carbon and climate change impact.

8.2. The Property has a current EPC rating of B on a certificate that is valid until December 2033.

9. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

Finance

The recommendation of the report is to acquire the freehold interest of 10 Gourley Street, N15 5NG for the terms set out in the exempt heads of terms which include the consideration for the acquisition and a short-term lease back from the Council to the current owner at a rent set out in the heads of terms.

Comments contained in the exempt report.

9.1. As the purchase is being funded via an external capital grant there is no financial effect on the Council's capital financing budget. There is a positive effect on the Council's General fund revenue budget through the unbudgeted income from the leaseback (and subsequent re-letting). As this income is a windfall it will not be taken to the SPU budget but retained corporately

Legal

9.2. The Council is acquiring the Property for planning purposes. It has the power under section 227 of the Town and Country Planning Act 1990 to acquire by agreement any land which it may require for any purpose for which a local authority may be authorised to acquire land under section 226. The Property is required for a purpose which it is necessary to achieve in the interests of the proper planning of the area in which the Property is situated.

9.3. Any leaseback of the Property to the current owner will be outside the security of tenure provisions applicable to business tenancies. This will allow the Council to obtain possession of the Property at the end of the lease term.

Strategic Procurement

9.4. Strategic Procurement were consulted in the preparation of this report. The recommendations in section 3 of the report relate to a property and land transaction which are outside of the Procurement Contract Regulations 2015.

Equality

9.5. The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.
- Advance equality of opportunity between people who share those protected characteristics and people who do not

- Foster good relations between people who share those characteristics and people who do not.

9.6. The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

9.7. Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

9.8. The decision in question is regarding the acquisition of a property at 10 Gourley Street. The Council plans to let the property on commercial terms upon expiry of the short-term leaseback to the seller. These commercial terms will contain sufficient flexibility to enable the Council to take back possession of the Property after circa 5 years if a viable larger scale or whole (Gourley Triangle) site redevelopment is considered to be feasible.

9.9. Thus the acquisition should have no equalities implications and a neutral impact on those with protected characteristics.

10. Use of Appendices

10.1. The following appendices are included:

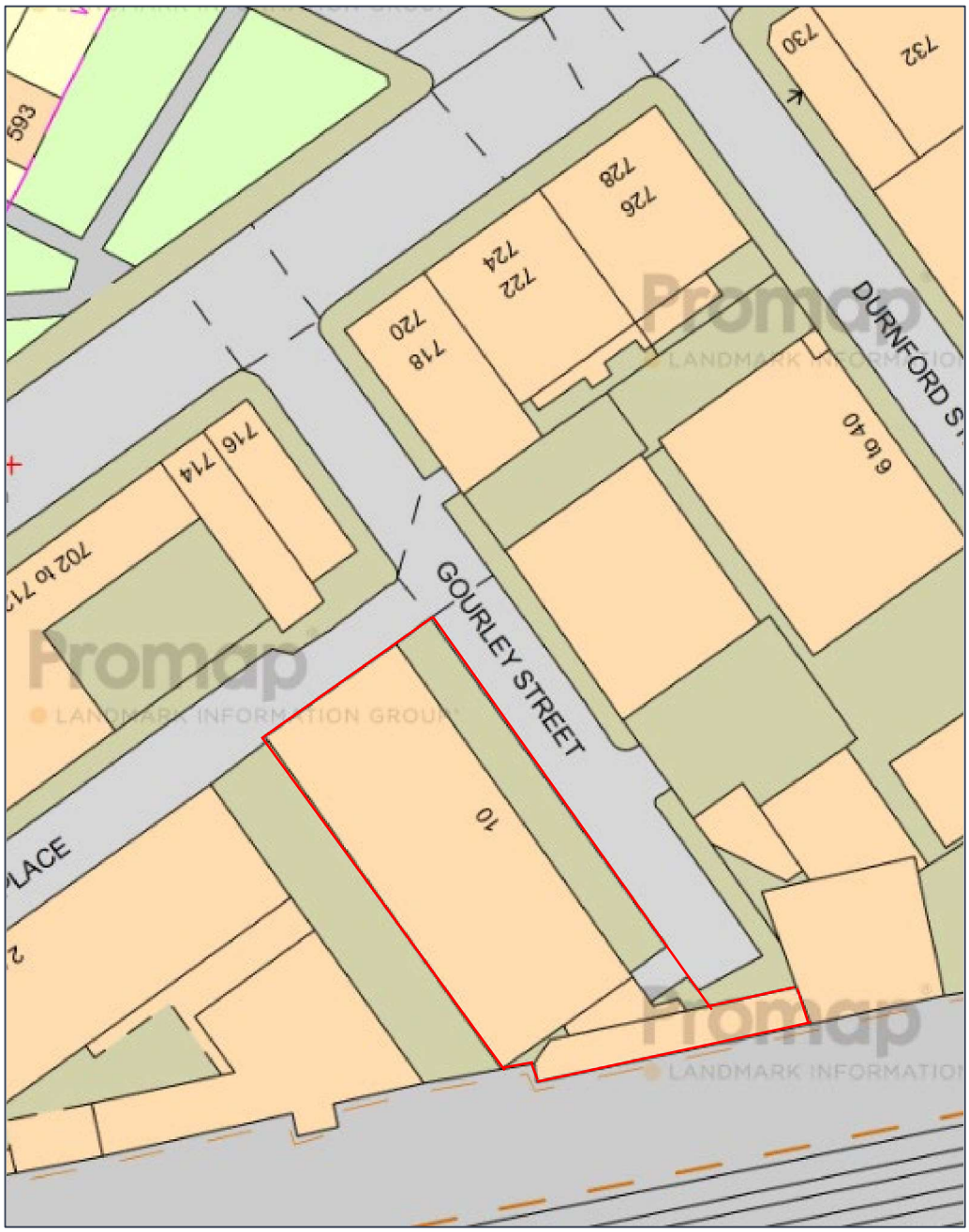
- Appendix 1 – Site Plan
- Appendix 2 – Heads of Terms (Exempt)
- Appendix 3 – FHSF Boundary Plan
- Appendix 4 – Project Adjustment Request (Exempt)
- Appendix 5 – PAR Confirmation (Exempt)

Background Papers

None

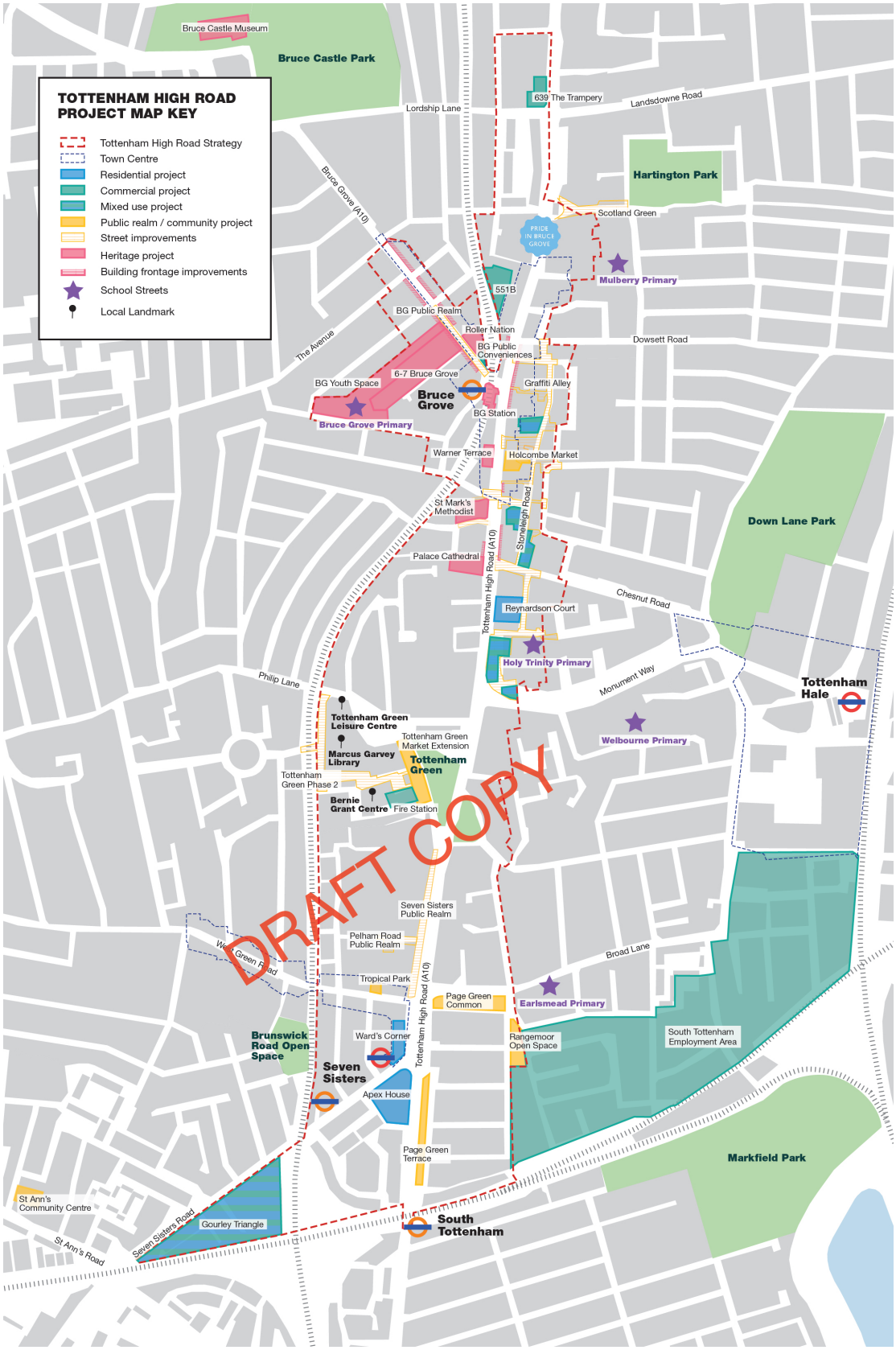
Site Area

3.5 The site, which extends to 0.06 hectares (0.155 acres) with a site coverage of c.95%.



3.6 This area has been computed using the Ordnance Survey Promap system and the provided land registry plan above. We have assumed that this represents the correct boundary to the site and that there are no ongoing boundary disputes. We recommend that this is confirmed with your solicitors.

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TOTTENHAM HIGH ROAD PROJECT MAP KEY
Tottenham High Road Strategy
Town Centre
Residential project
Commercial project
Mixed use project
Public realm / community project
Street improvements
Heritage project
Building frontage improvements
School Streets
Local Landmark
Bruce Castle Museum
Bruce Castle Park
Lordship Lane
639 The Trampery
Landsdowne Road
Hartington Park
Bruce Grove (A10)
Scotland Green
PRIDE IN BRUCE GROVE
Mulberry Primary
551B
BG Public Realm
Roller Nation
Dowsett Road
The Avenue
BG Public Conveniences
BG Youth Space
6-7 Bruce Grove
Graffiti Alley
Bruce Grove
BG Station
Bruce Grove Primary
Warner Terrace
Holcombe Market
St Mark's Methodist
Stoneleigh Road
Down Lane Park
Palace Cathedral
Tottenham High Road (A10)
Chesnut Road
Reynardson Court
Holy Trinity Primary
Monument Way
Philip Lane
Tottenham Hale
Tottenham Green Leisure Centre
Tottenham Green Market Extension
Welbourne Primary
Marcus Garvey Library
Tottenham Green
Tottenham Green Phase 2
Bernie Grant Centre
Fire Station
DRAFT COPY
Seven Sisters Public Realm
Pelham Road Public Realm
West Green Road
Broad Lane
Tropical Park
Page Green Common
Earlsmead Primary
Brunswick Road Open Space
Ward's Corner
Rangemoor Open Space
South Tottenham Employment Area
Seven Sisters
Apex House
Page Green Terrace
Markfield Park
St Ann's Community Centre
Seven Sisters Road
Gourley Triangle
St Ann's Road
South Tottenham

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MINUTES OF MEETING Cabinet Member Signing HELD ON Wednesday, 17th January, 2024, 11.30 – 11.40am

PRESENT:

Councillors: Peray Ahmet

ALSO ATTENDING: Jahedur Rahman, Ayshe Simsek

17. FILMING AT MEETINGS

The chair referred to the notice of filming at meetings and attendees noted this information.

18. APOLOGIES FOR ABSENCE

There were no apologies.

19. URGENT BUSINESS

There were no items of urgent business.

20. DECLARATIONS OF INTEREST

There were no declarations of interest.

21. DEPUTATIONS/ PETITIONS

There were no deputations.

22. FIRE SAFETY CONTRACT BUDGET VIREMENT

The Leader of the Council considered the report which sought approval of the proposed virements to make adequate budget provision for the expenditure required to implement the fire safety programmes outlined in the report.

The Operational Director for Housing & Building Safety provided an update on the current position of the Regulatory Notice issued to the Council in March 2023 by the Regulator for Social Housing for breach of the Home standard. It was noted that the Council had made significant progress in fulfilling the voluntary undertaking.

In March 2023 there had over 8000 homes without a valid electrical safety certificate, and this has reduced to 600 all which are due to repeated no access. These remaining properties were those that the Council were currently not able to access and were seeking legal intervention.

It was noted that once the Council have completed all of commitments to the regulator as part of the voluntary undertaking, there would be an application to the Regulator for Social Housing to remove the notice.

The proposed virement would support delivery of 1300 of the remaining 2000 overdue high-risk actions which is part of the Council's voluntary actions. This has been reduced from over 4000 high risk actions. The remainder were in several smaller programmes allocated to individual teams and being delivered through in – house or existing supply chains. The funding would enable the contracts to deliver these critical works.

Noted that the asset management strategy sets out the Councils position to get to zero non decent standard homes by 2028.

Noted a positive co regulation relationship had been developed with the Regulator for Social Housing to ensure the Council were on track in delivering the Voluntary undertaking and significant amount of work had been undertaken to complete all the recommendations from the Housing Ombudsman investigation.

RESOLVED

To authorise virements to cover the cost of capital and revenue expenditure for the financial year April 2023 to March 2024, to a total of £2,100,540.00, of which £980,320.0 is revenue and £1,120,220.00 is capital, in order to implement the fire safety programme.

Reasons for decision

In January 2023, the Council wrote to the Regulator of Social Housing (RSH), the body that provides independent oversight of all registered social housing providers including local authorities and Housing Associations and made a voluntary self-referral for a potential breach of the Home Standard.

The RSH assessed the evidence provided as part of the self-referral and confirmed that the Council has indeed breached two parts of the Home Standard. As a result, the RSH published a Regulatory Notice on 6th March 2023. This notice remains "live" for 12 months or until full compliance is achieved.

In July 2023, the council entered a Voluntary Undertaking with the Regulator of Social Housing with the aim of achieving full compliance and discharge of the Notice.

The Voluntary Undertaking was agreed by Cabinet in July 2023 and delegated the authority to the Chief Executive to enter a Voluntary Undertaking with the Regulator.

The Voluntary Undertaking requires Haringey Council clearing the backlog of high-risk fire actions by 31st March 2024. Failure to do so can result in direct intervention from the Regulator of Social Housing.

These works require the use of multiple external contractors due to both resource requirements and specialist certification.

As part of the programme development to deliver the works required to meet our commitments, the value has been established and is additional to previously budgeted provision within the current financial year.

Alternative options considered.

Do Nothing

Doing nothing will mean that the Council will fail to meet its commitments to the Regulator provided in the Voluntary Undertaking.

23. NEW ITEMS OF URGENT BUSINESS

CHAIR:

Signed by Chair ……..

Date ……

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MINUTES OF THE CABINET MEMBER SIGNING HELD ON MONDAY, 22ND JANUARY 2024 - 2:00PM

PRESENT:

Councillors: Zena Brabazon

1. FILMING AT MEETINGS

The Chair referred to the notice of filming at meetings and this information was noted.

2. APOLOGIES FOR ABSENCE

There were no apologies for absence.

3. URGENT BUSINESS

There were no urgent business.

4. DECLARATIONS OF INTEREST

There were no declarations of interest.

5. DEPUTATIONS/ PETITIONS

There were none.

6. HARINGEY COUNCIL'S LOCAL SCHOOLS FUNDING FORMULA FOR 2024/25

The Cabinet Member for Children, Schools and Families considered a report that sought the approval for changes to the Council's local schools funding formula for the 2024-25 financial year in line with the Schools National Funding Formula set out by the Department for Education (DfE).

Please be advised that the Chair of Overview and Scrutiny had agreed that the call-in procedure shall not apply to this urgent decision. This was because the decision was urgent and any delay in implementation caused by the call-in procedure would seriously prejudice the Council's or the public's interests due to the fact that the Council was legally required to submit the Authority Proforma Tool to the Department for Education (DfE) by 22 January 2024.

This decision would ensure that the Council would meet its legal obligations and would allow the authority to detail its schools block funding (SBF) formulae to model and confirm how it planned to fund for the funding year. Accordingly, the Chair of Overview and Scrutiny Committee had agreed that the decision was both reasonable

in all circumstances, and that it should be treated as a matter of urgency. This was in accordance with Part 4, Section H, and Paragraph 18 (a) and (b) of the Council Constitution.

RESOLVED

The Cabinet Member for Children, Schools and Families:

1. To agree the changes to the local schools funding formula for the 2024-25 financial year.
2. To adopt Model 1 as outlined in the consultation with schools to set 0.46% the Minimum Funding Guarantee to all schools.
3. To note the transfer of 0.50% from the Schools Block allocation to the High Needs Block as agreed by the School's Forum under the safety valve agreement with the DfE in October 2023. At the October 2023 decision, this was estimated at £1.140m and with the proposed DSG allocation since published this equates to £1.129m.
4. To agree the Growth fund be set at £300k.
5. To agree the Block transfer of £122k from the Schools Block to the Central Block for Education Welfare Services, dependent on any necessary consent from the DfE.
6. To agree the block transfer from the school's block to the Early Years block of £60k to fund a Nursery School on a split site, dependent on any necessary consent from the DfE.
7. To agree the de-delegation of £210k for Trade Union Representation (for maintained schools only).

Reasons for decision

The Council was legally required to set the local schools funding formula and must submit this to the ESFA by 22nd January 2024. These changes required approval by the Council to complete the Authority Proforma Tool, as required by the ESFA. Such approval could be given on behalf of the Council by the Lead Member.

Options Considered

All schools in Haringey were consulted on the proposed changes for 2024-25 to the Council's Schools Funding Formula via e-survey. The consultation started on 25th November 2023, with a deadline of 8th December 2023 for responses from Head Teachers and Chairs of Governors.

Table A showed options available and total responses received for all options.

Table A Consultation Results:

Haringey Schools Consultation Authority Proforma Tool (APT) Survey Results	Total responses Received
Question 1: Please indicate your preferred option for Haringey's funding model 2024-25	
Model 1: Replicating NFF model.	10
Model 2: Replicating NFF model with AWPU variations.	22
Question 2: To support Growth Funding budget of £300k	
· Yes	29
· No	3
Question 3: To support Block Transfer of £122k for Education Welfare	
· Yes	17
· No	15
Question 4: To support Early Years Block Transfer for Nursery Split Site funding of £60K	
· Yes	22
· No	10
Question 5: To support de-delegated budget from maintained schools for Trade Union Facilities time of £210K	
· Yes	25
· No	5
Question 6: To support High Needs Block Transfer of £1.140m (as part of Safety Valve Program - year 2)	
· Yes	29
· No	3
Question 7: Any further comments you would like to make with regards to the consultation.	20

Question one of the consultation exercises asked schools' which model they preferred, either model 1 or model 2. 10 respondents preferred model 1 and 22 respondents preferred model 2.

While it remained the Government's intention that a school's budget should be set on the basis of a single national formula, or NFF in 2024-25, local authorities are still allowed to use either the NFF formula values or locally agreed values within the allowable NFF range to determine funding allocations for schools.

The update of NFF for schools and high needs for 2024/25 was published by the DfE in July 2023 and republication in October 2023 on the following link and the move to a 'hard' formula without local input had not been implemented by the DfE with minimal changes for 2024/25.

School Funding Formula 2024/25

Following a decision by Schools Forum in October 2023, the model options for the 2024/25 DSG funding formula consultation with all schools was delegated to the Schools Block Working Group (SBWG). The allowable range for setting the MFG for 2023-24 was between +0% to +0.5%. With the final settlement figures the MFG could

only be set between 0.46% and -3.8% (a minus MFG would require a disapplication request.

Now the final settlement had been announced at £225.783m and the NFF funding requirements applied to the APT the adoption of model 1 (NFF) was the only option available based upon affordability.

a) The maximum local block transfer was set at 0.5%. The October 2023 schools' forum agreed a block transfer of 0.5% to HNB. The adoption of the £0.122m Education Welfare Services and £0.060m split site would be contingent on DfE approval for block transfers above 0.5% and a disapplication request had been submitted 17th November 2023.

b) Two MFG models were selected for consultation and appendix 1 details reported questions and responses, table F below summarised models with model 2 being unaffordable with formula factors costing additional £3.5m, plus MFG requirement being set to -3.8% which would require a disapplication request to SoS.

TABLE F - Consultation exercise and models

CONSULTATION	OUTCOME	
Model 1	**Model 1**	Affordable
DSG formula factors 100% to NFF values	DSG formula factors 100% to NFF values	
HNB transfer of 0.5%	HNB transfer of 0.5%	
MFG set to 0.38%	**MFG set to 0.46%**	
Capping set at 50%	Capping set at 50%	
Model 2	**Model 2**	Unaffordable
DSG mixture of formula factors 100% to NFF values (as per Model 1) except for AWPU (age weighted pupil unit) for primary factor set to maximum rate permissible (due to falling rolls/primary: secondary funding ratio difference) and minimum rate for AWPU secondary factor permissible.	**DSG mixture of formula factors BUT unaffordable additional cost £3.5m**	
HNB transfer of 0.5%	HNB transfer of 0.5%	
MFG set to 0.29%	**MFG set to -3.8% (disapplication requirement)**	
Capping set at 50%	Capping set at 50%	

Further to the consultation responses and the DSG allocations (see Appendix 1 for the financial implication of each decision for all schools) the following proposals were recommended for school's forum approval, subject to financial and data validation by the ESFA formula validation checks.

Following the consultation results and confirmations of the published allocations of the APT on 19th December 2023, see Appendix 1 of the report for individual school allocations for 2024-25 Model 1 were approved by the School's Forum on 11th January 2023.

7. NEW ITEMS OF URGENT BUSINESS

There were no new items of urgent business.

CABINET MEMBER: Councillor Zena Brabazon

Signed by Chair ……..

Date ……

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MINUTES OF THE CORPORATE PARENTING ADVISORY COMMITTEE HELD ON MONDAY, 2ND OCTOBER, 2023, 7:30PM – 10:00PM

PRESENT: Councillors Zena Brabazon (Chair), Elin Weston, Cressida Johnson, Lotte Collett, Ibrahim Ali, Marsha Isilar-Gosling.

ALSO PRESENT: Councillor Lucia das Neves

1. FILMING AT MEETINGS

The Chair referred to the filming of meetings and this information was noted.

2. APOLOGIES FOR ABSENCE (IF ANY)

No apologies had been received.

At 7:31pm, the meeting adjourned to meet with ASPIRE and then reconvened at 8:00pm.

3. URGENT BUSINESS

There were none.

4. DECLARATIONS OF INTEREST

There were no declarations of interest.

5. MINUTES

Councillor Dana Carlin's name on the attendance record would be changed to read Councillor Lotte Collett.

RESOLVED: That subject to the above change, the minutes of the meeting of 12 July 2023 be agreed as a correct record.

6. PERFORMANCE REPORT

Mr Richard Hutton, Senior Performance Officer, introduced the report.

The meeting heard that:

- Suitable accommodation was defined through regulations for Children in Care, OFSTED and Housing. Specific to this discussion staying with one's own foster carers rather than

staying in a multiple occupancy home was the context for defining suitability and this was achieved largely through Staying Put arrangements.

- At a previous meeting of the Committee, a report was submitted which discussed what constituted suitable accommodation. Under the new changes with OFSTED, the Committee took a decision not to use accommodation such as the YMCA, to move away from any model around HMOs for children and young people in care and that the Council would work to identify suitable accommodation to ensure that the standard would be good enough for one's own child. It would be helpful if a short note could be re issued to the Committee regarding how "suitable accommodation" would be defined with all the newly attained changes.

- Some young people may be allocated suitable accommodation who then decided they would prefer to stay with family after their eighteenth birthday. This was a challenging situation as there was little in law that could be done to change the situation. Although the numbers for situations such as these were low. An update could be provided to the Committee regarding the issue.

- Much work had gone into placement stability. The Council in the past six months had placement stability meetings with partner agencies to ensure that the needs were being identified to prevent children having to move placements. Providers were being held to account for the work they were doing with the key work support. OFSTED had commented that the borough was on the right trajectory in terms of placement stability. The meetings were reviewed regularly and the Council continued to examine the children being brought into Haringey and track those placements to ensure that they remained where they were.

- The Council had recently launched a video along with another local authorities trying to attract foster carers. Councillors were encouraged, whilst engaging in Champions work, to have conversations with people on how they could become foster carers. Haringey was working in collaboration with Islington. The video would be sent to members of the Committee.

- Information would be provided to the Committee regarding orthodontic care for young people.

- Data reports regarding those in the system up to age 25 could be provided to the Committee, including at the next meeting.

- There had been a number of factors that had impacted on the three or more moves for the same child over different periods. One of them related to the way the court processes work. Whilst the courts had completed significant work to clear the backlog created by the coronavirus lock down, the borough was still experiencing some of the effects of delayed proceedings. There were still children who had waited two years for their proceedings to end and, during that time, it was difficult to contain them in one placement separately. There was also volatility around the residential mother and baby units. Sometimes the quality of the assessments meant that reassessments had to be made at the Court's request at another setting. This counted as another placement move and sometimes the prematurity of the direction to test in the community meant that they came back into care and would be separated. This would appear as instability in the data. In relation to adolescents, in a market that was volatile, it was challenging to offer stability in the semi-independent and residential arena so investment was being made in the borough's LAC Sufficiency Strategy.

- Efforts needed to be made to ensure that families were assisted with acute stress to prevent them from needing to come into care. It was important to have good recording systems and note the complex ways young people could be affected. For example, the agency afforded to adults to self-determine if they had capacity and this could mean that adults services could not intervene. Children and Social Care had to then ensure that harm did not extend to those adult children. This could happen in cases like substance misuse. It may be possible to examine areas of stress affecting families and report back to the Committee in January 2024. Whether it was acute stress, domestic abuse or housing issues, it was generally the case that families were in stressed situations which were usually also compounded by the cost-of-living and the quality of housing.

- There had been an increase in the unaccompanied asylum-seeking children. As the children were coming in, there were young people ageing out. Whilst the young people turned 18, they still required a service, but this was not visible in the statistics. The overall pressure when numbers only were presented was not always clear. The borough was still about 20 under its threshold. There was a steady intake of around three children a month. The borough had been approached by Kent County Council to take some children from the hotels and other local authorities surrounding Haringey were also seeing an increase. Local authorities were seeking assistance around resources and placements. There was difficulty in finding “matched” placements for the children. A number had gone into IFAs (independent foster carers) and the borough had managed to place some individuals locally. Finding the right therapeutic supporters was also a pressure. Accessing the right ESOL was also a concern because when children arrived in the middle of term, it could be difficult to get them into the right ESOL classes. Work was being done with the virtual school regarding tuition for some of the children. Another issue had been around accessing the right immigration lawyers and there seemed to be some challenges around this. Support was being sought from the London Asylum Consortium. The rota referral meant that the Council had to place young people within 5 working days and this depended on finding the right matched placements within the market. Age assessments, when required had to be within 28 days which was challenging when trying to find the right interpreter. Until recently, the Council had been quite reliant on an independent social worker to assist with some of the age assessments, but the Council had built up the expertise and a pool of trained social workers within the service. Attempts were being made to look at the next steps in terms of the increasing numbers and what that really meant for the service and staffing. The meeting agreed that there would be a more detailed report on this issue at the next meeting. It would also be useful to also have details in the report such as country of origin, languages spoken and other demographic details. The report could list the changes in the incident that happened between the Home Office and Kent County Council at the next meeting.

The Chair felt that the Council could consider finding a way to consult with a wider range of residents in Haringey who wanted to give something back to the community and may wish to become foster carers or be involved in other ways.

RESOLVED:

That the report be noted.

7. CHILDREN IN CARE KNOWN TO THE YOUTH JUSTICE SERVICE

Mr Matthew Knights, Head of Service, Youth At Risk, presented the item.

The meeting heard that:

- In relation to the qualitative research into stop and search, work was being done within the assessment processes in addition to research into the actual experiences of the young people. Further, young people would be provided with knowledge around the stop and search process including their rights. Documenting experience was important but it was also important to build upon this. Interventions were done with Police officers within the service around ensuring that children understood their rights around stop and search. As a result of the work of the Director of Children's Services, the Haringey Stop and Search pilot had been accepted by MOPAC and Sir Mark Rowley. Some of the work for the Haringey Youth Justice would sit under that pilot. This would include analysis across the Police in London and fed through the Youth Justice Service to understanding the experiences of young people and how adjustments could be made to the assessment process.

- In relation to the Disproportionality MOPAC project, this was being externally evaluated. It was part of a wider project involving Islington, Camden and Barnet youth justice services. Within the final stages of the mentoring happening, a last cohort of referrals that had just been submitted. That would then go into phase two, which would be about the evaluation process to then get the impact and understanding around what's worked and what had not worked. Haringey would also feed into that evaluation from a staff perspective.

- In relation to social prescribing, this was a new model that had just been embedded with our public health colleagues and it was flexible depending on the child's needs. There was a North Central London working group to look at the evaluation process. It was on a smaller scale and was done locally. It was important to ensure that children in care had access to the pilot and because the cohort was not always placed in Haringey. A lot of the children were placed outside the borough and they could sometimes miss out on some interventions. This would be funded that as part of our work that was being done for the child that would follow them wherever they went.

- Update reports should be brought to the Committee with the detail and intended impact of social prescription in January 2024.

- In relation to young people in custody, there was regular contact with the children and young people in custody, their caseworkers, with their Independent Reviewing Officer (IRO) and with Children and Social Care. It was important to note any concerns regarding the child's inability to participate in engagements within the custodial establishment. There was also an escalation process.

RESOLVED:

That the update be noted.

8. ADOPT LONDON NORTH ANNUAL REPORT

Ms Lydia Samuel, Head of Service, Adopt London North, presented the report.

The meeting heard that:

- There was no current level of concern about the level of referrals from Haringey. When considering the number of family finding referrals, the percentage of referrals that resulted in a match provided an indication of how many of those children were likely to end up going on to have a care plan for adoption.

- The purpose of Adopt London beginning to provide the training for social workers was because it became apparent that, across the boroughs, the adoption expertise had largely come into the regional adoption agency. Therefore, some of the expertise to provide training and guidance had largely been lost from the local authority. This was why it would be beneficial to coordinate the training centrally. The training would be provided regularly enough so that all of the social workers that needed attend it could do so. Monitoring was done with quality assurance in relation to how often it needed to run. It would be interesting to look over time at whether the quality of the work improved. It would be possible to observe this easily because reports would be submitted to the Adoption Panel and Quality Assurance.

- In relation to the Black Adoption Programme, one of the things examined was the proportion of Black children within the adoption system and the project was aimed at Black and Mixed Black ethnicity children rather than the global majority children. It was well-known that within adoption, Asian children could particularly be placed for adoption very quickly. There was a surplus of Asian adopters and very few Asian children that place for adoption. In the past, when research was done into global majority children as a whole, it had been the case that, in many ways, the extent of the disparities for Black children had been masked. The figures in the report showed that over the five-year period of the analysis that was done, 35% of children within the Adopt London North boroughs were Black or Mixed Black ethnicity children. This compared to an average of 26% across Adopt London, which was significant.

- In relation to children in care, Black children were over represented in the care system. There was a report detailing all the research on Black Adoption projects. This could be presented to the Committee.

- It was rare for adoptive families to receive an adoption allowance. There was provision for adoption allowances where those were needed and they were similar to special guardianship allowances. In most cases, they were attached to the needs of the child. For example, if somebody adopted a sibling group or a disabled child, it was up to the local authority to approve adoption allowance for those families. Families were also able to re-approach Adopt London later on if their situation changed and they came under financial hardship and had to be supported with an allowance. However, the vast majority of families did not have an allowance and did not need one.

- Social media had been helpful. Some of the recruitment methods had changed significantly since the organisation had become a regional agency as there was little competition and most people who were interested in adoption do an internet search or look on social media to find Adopt London very quickly. Work was also being done with local authority media teams to specifically look at campaigns at the specific parts of the year to local residents. This helped residents to understand that Adopt London was Haringey's adoption agency. In relation to Black adopters, the work that had been done in the project showed methods that were successful with other prospective adopters were not successful with Black adopters to the same degree. One of the pilots that Adopt London had applied for funding was to have a community led arrangement where the organisation would have people who had relationships in local community groups to learn about the needs of adoption and Black children and be given tools and resources

to go back into their community space and promote adoption. Work was also being done to make sure that if there was an increase of black adopters, the organisation was ready to deal with the demand.

- In relation to governance arrangements, the Governance Board had been very strong and there had been a benefit from the continuity in that group. There had been governance challenges in the last year, including renegotiated funding arrangements and which meant that the DCSS became involved across the boroughs and successful resolutions had been reached. The relationships generally across this area and the other areas of work that was done jointly across had been beneficial The Assurance Board looked at the operational work. Having different layers of governance had been useful.
- Discussions had been held with the London Improvement Innovation Alliance, who coordinated the need members meeting regarding how a presentation could be made to all of the lead members in London together about the project. A briefing had been offered for all the directors across London to attend all at once and ask questions.

RESOLVED:

That the presentation be noted.

9. ANY OTHER BUSINESS

Update on the Champions Model

The meeting heard that discussion would be held with Champions on having a Corporate Parenting Week. The meeting agreed that this would go ahead in the new year.

LAC Sufficiency Strategy

An update on this would be provided by the C&YPS Commissioner in January 2024

Educational Results of Children in care

The meeting heard that in relation to key stage two data, regarding reading writing and maths, the borough attained 42.9% accepted standards A comparison to last year showed a significant improvement. Reading was recorded at 57.1%, maths was at 71.4%. The strongest areas performance was maths and Grammar, Punctuation and Spelling. The Council had invested in Letterbox, a service which helped improve reading.

For GCSEs, there were 51-year 11s who were eligible for exams. For maths there were seven young people, Grade 7 and above. English Literature had twelve young people Grade 4 and above. English Language had seven young people Grade 4 and above. Science had eight young people Grade 4 Four and above. There needed to be a closer monitoring of young people at Key Stage 4.

For university destination, there were 46 heading to university. There were 11 currently in their first year, 14 in their second year and 16 in their second year. The Committee welcomed this news.

IRO Annual Report and First Quarter Update

Mr Nazim Hussain, IRO Service Manager, introduced a presentation on the item. He provided an overview of the annual report. The meeting heard an update of progress from the last annual report, child participation in reviews, feedback received from participants, the post OFSTED action plan, the use of the dispute resolution policy and the IRO priorities for 2023/24.

CHAIR:

Signed by Chair ……..

Date ……

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