

LONDON BOROUGH OF BROMLEY

MINUTES

**of the proceedings of the Meeting of the
Council of the Borough
held at 7.00 pm on 16 July 2018**

Present:

**The Worshipful the Mayor
Councillor Kim Botting FRSA**

**The Deputy Mayor
Councillor David Cartwright QFSM**

Councillors

Marina Ahmad	Peter Fortune	Angela Page
Gareth Allatt	Kira Gabbert	Chris Pierce
Vanessa Allen	Hannah Gray	Neil Reddin FCCA
Graham Arthur	Will Harmer	Will Rowlands
Kathy Bance MBE	Colin Hitchins	Michael Rutherford
Yvonne Bear	William Huntington-	Richard Scoates
Julian Benington	Thresher	Suraj Sharma
Nicholas Bennett J.P.	Simon Jeal	Colin Smith
Mike Botting	David Jefferys	Diane Smith
Katy Boughey	Charles Joel	Gary Stevens
Mark Brock	Josh King	Melanie Stevens
Kevin Brooks	Kate Lymer	Harry Stranger
Mary Cooke	Christopher Marlow	Kieran Terry
Aisha Cuthbert	Robert Mcilveen	Michael Tickner
Peter Dean	Russell Mellor	Pauline Tunncliffe
Ian Dunn	Alexa Michael	Michael Turner
Nicky Dykes	Peter Morgan	Stephen Wells
Judi Ellis	Keith Onslow	Dave Wibberley
Simon Fawthrop	Tony Owen	Angela Wilkins

The meeting was opened with prayers

In the Chair
The Mayor
Councillor Kim Botting FRSA

19 Apologies for absence

Apologies for absence were received from Councillors Robert Evans and Samaris Huntington-Thresher, and for lateness from Councillor Kevin Brooks.

20 Declarations of Interest

Councillor Hannah Gray declared an interest as she had a contract with Biggin Hill Airport, and stated that she would leave the room during questions related to the Airport.

Councillor Colin Hitchins declared an interest as an employee of Biggin Hill Airport.

21 To confirm the Minutes of the two special meetings of the Council held on 16th May 2018, the annual meeting on 16th May and the special meeting held on 30th May 2018

RESOLVED that the minutes of the special meetings held on 16th May 2018, the annual meeting held on 16th May 2018 and the special meeting held on 30th May 2018 be confirmed.

22 Questions from members of the public where notice has been given.

Twelve questions had been received from members of the public for oral reply. These are set out, with the answers given, in Appendix A to these minutes.

Two questions had been received from members of the public for written reply. These are set out, with the answers given, in Appendix B to these minutes.

23 Questions for oral reply from Members of the Council where notice has been given.

Twenty seven questions had been received from Members of the Council for oral reply. These are set out, with the answers given, in Appendix C to these minutes.

(Councillor Neil Reddin declared an interest in question 13 as a former governor of St Olave's School.)

24 Questions for written reply from Members of the Council where notice has been given

Ten questions had been received from Members of the Council for written reply. These are set out, with the answers given, in Appendix D to these minutes.

25 To consider any statements that may be made by the Leader of the Council, Portfolio Holders or Chairmen of Committees.

No statements were made.

26 Depot Strategy - Capital Works
Report CSD18103

A motion to approve the addition of the scheme for Depot Improvement Works to the capital programme with a total cost of £6.5m was moved by Councillor William Huntington-Thresher, seconded by Councillor Colin Smith and **CARRIED**.

27 Capital Programme Monitoring - 1st Quarter 2018/19
Report CSD18104

A motion to approve the addition to the capital programme of £1,995k on the Disabled Facilities Grant funded scheme to reflect the latest grant funding available was moved by Councillor Graham Arthur, seconded by Councillor Colin Smith and **CARRIED**.

28 Treasury Management - Annual Report 2017/18
Report CSD18110

A motion to note the Treasury Management Annual Report for 2017/18 and approve the actual prudential indicators within the report was moved by Councillor Graham Arthur, seconded by Councillor Colin Smith and **CARRIED**.

29 Health and Wellbeing Board - Annual Report 2017/18
Report CSD18105

A motion to receive and note the annual report from the Health and Wellbeing Board was moved by Councillor David Jefferys, seconded by Councillor Colin Smith and **CARRIED**.

30 Councillor Attendance 2017/18
Report CSD18104

The annual attendance data for 2017/18 was noted.

31 To consider Motions of which notice has been given.

The following motion was moved by Councillor Ian Dunn and seconded by Councillor Simon Jeal -

Road Safety

“This Council recognises residents’ concerns about road safety and so instructs a review of its current policy and its implementation.”

The following amendment was moved by Councillor William Huntington-Thresher and seconded by Councillor Will Harmer -

Add “Despite the Council’s high performance in terms of road safety improvements in comparison to other boroughs,” before the text of the motion and delete from “so instructs...” and add “requests the Environment PDS review the latest Local Implementation Plan (LIP) with the target of further road safety improvements at its next meeting.”

This amendment was **CARRIED**.

The substantive motion therefore read -

“Despite the Council’s high performance in terms of road safety improvements in comparison to other boroughs, this council recognises residents’ concerns about road safety and requests the Environment PDS review the latest Local Implementation Plan (LIP) with the target of further road safety improvements at its next meeting.”

More than five Members having risen in their seats, a recorded vote was conducted.

Voting in favour -

Councillors Marina Ahmad, Gareth Allatt, Vanessa Allen, Graham Arthur, Kathy Bance MBE, Yvonne Bear, Julian Benington, Nicholas Bennett JP, Mike Botting, Katy Boughey, Mark Brock, Kevin Brooks, Mary Cooke, Aisha Cuthbert, Peter Dean, Ian Dunn, Nicky Dykes, Judi Ellis, Simon Fawthrop, Peter Fortune, Kira Gabbert, Hannah Gray, Will Harmer, Colin Hitchins, William Huntington-Thresher, Simon Jeal, David Jefferys, Charles Joel, Josh King, Kate Lymer, Christopher Marlowe, Robert Mcilveen, Russell Mellor, Alexa Michael, Peter Morgan, Keith Onslow, Tony Owen, Angela Page, Chris Pierce, Neil Reddin, Will Rowlands, Michael Rutherford, Richard Scoates, Suraj Sharma, Colin Smith, Diane Smith, Gary Stevens, Melanie Stevens, Harry Stranger, Kieran Terry, Michael Tickner, Pauline Tunnicliffe, Michael Turner, Stephen Wells, Dave Wibberley and Angela Wilkins.

Abstaining -

The Mayor, Councillor Kim Botting FRSA and the Deputy Mayor, Councillor David Cartwright QFSM

The motion as amended was **CARRIED**.

32 The Mayor’s announcements and communications.

The Mayor thanked Members who had attended the Armed Forces Day ceremony on 28th June, and reminded them about the Voluntary Service Reception on 19th July. She also announced that her first charity dinner would be at the Hisar Turkish Restaurant on 31st July, and that there would be a Charity Ball at The Warren on 27th October.

The Mayor led the chamber in a round of applause for the Bromley Team who had just won the London Youth Games for the third year in a row.

The Meeting ended at 8.46 pm

Mayor

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COUNCIL MEETING

16TH JULY 2018

QUESTIONS FROM MEMBERS OF THE PUBLIC FOR ORAL REPLY

1. From Sarah Phillips to the Environment and Community Services Portfolio Holder

How much money does the Council hold from funds raised by the good people of Beckenham and Bromley for the restoration of the bandstand in Croydon Road Recreation Ground and can the Council provide a breakdown of those funds by source i.e. Friends of the Park, Bowie Beckenham Oddity, brick sales, commercial pledges etc?

Reply:

Please find below the figures for the bandstand as we currently have them . These are based on updates provided by Finance as of the 9th July 2018. These are the total sums sitting within the dedicated Council cost-codes for the bandstand - there may be other sums in addition currently held by the Friends etc. which have not been transferred over to us yet and of which we are therefore not aware.

Collector of funds	Amount
Friends group (community fundraising activities, funds from first fundraising concert held)	£19,350.65
Memory of a Free Festival (two fundraising concerts)	£28,512.00
LB Bromley (Bandstand Bricks, Launch Party Tickets, on-line donations, raffles, Walking in Ziggy's Footsteps tour donations, collecting tins, £5k match funding towards Project Management fees previously committed)	£18,836.95
Total match-funding to date	£66,699.60

Supplementary Question:

Will the Council offer any match-funding given that so much, £66,000, has been raised by people in Beckenham for what is a Council owned asset?

Reply:

I am not in a position to make policy in answer to a question, but it would be consistent with past actions that we have made to look to match-fund or partially match-fund the funds raised by Friends Groups, but that would have to go through due process.

2. From Peter Zieminski to the Renewal, Recreation and Housing Portfolio Holder

Alternative Route to Runway 03: The increase in operating hours at the airport has caused a dramatic increase in large, low-flying aircraft. Yet the condition requesting a new route to alleviate residents North and West of the Airport has not been complied with. What are the Council's plans to provide the promised relief to residents?

Reply:

The Council has always accepted it is not in the Airport's power to unilaterally introduce an alternative route to runway 03. We are optimistic that this change will happen and know that the Airport have worked very hard to overcome technical difficulties and continue to liaise with the CAA even in recent weeks and months.

Supplementary Question:

How can it be acceptable to Council Members that the Airport has been enjoying the longer hours for over a year but the residents are still awaiting the promised mitigation? Who has really got a grip of this?

Reply:

The only people who have a grip of it, sadly, are the CAA. It is not within our power, as I said before - I wish it were. We continue ourselves to press the CAA, as do the Airport, we know that is the case and I feel sure that we will have decision within the next few weeks. It is the Civil Service that we are dealing with. An interesting fact that you might like to know is that the increase in movements in the extra hours that the Council has granted have been, in the period 1st April to 30th June this year, a total of 68 movements in approximately 100 days - fewer than one extra movement in the morning every day, sometimes more, sometimes less.

3. From David Clapham to the Renewal, Recreation and Housing Portfolio Holder

The Consultative Minutes (18th January 2018) record... "In answer to a question from the Chairman, Richard Parry advised that the Sub-Committee only upheld complaints which related to breaches of noise restrictions. Tracking deviations were picked up automatically by the NMTKS."

The NAP stated the NMTKS would provide members of the public with more than now reported in the Consultative Committee Minutes. Residents in Keston (Designated Noise Sensitive Area) are getting fed up with large jets visually approaching runway 03 flying low over their homes. The Committee is apparently in violation of Government Guidelines, The Aviation Policy Framework and in breach of the agreement with Bromley Council. Do you agree?

Reply:

The Noise Monitoring Track Keeping System (NMTKS) does provide members of the public with more than now reported in the Consultative Committee Minutes in the sense that it is a virtually live system, which also allows retrospective examination of individual aircraft flights. I am sure you are aware but I was actually present at this meeting and noted some of the welcome developments to better manage noise associated with the airport. I am supportive of the Airport focussing residents' attention on noise nuisance rather than aircraft being off-track as surely this is the primary concern of residents. That is not to say that track-keeping is not important and I welcome the fact that these are picked up automatically and that pilot behaviour is being focussed on, which the minutes make clear. I am not immediately clear which part of the 86 page aviation Policy Framework is being breached, but if you would like to advise me perhaps by email after the meeting I am happy to look at that in more detail.

Supplementary question:

The Biggin Hill Managing Director has acknowledged the incorrect data emanating from the NMTKS. Monitoring Biggin Hill's performance for impact on residents is vital. Is the Council aware that the data is wrong, and when will it be accurate? The Government requires open and effective communication with local communities - this is not happening.

Reply:

I was not aware that there was any inaccuracy and I will urgently investigate that and report back to you.

Additional Supplementary question:

Councillor Simon Fawthrop asked whether the Portfolio Holder was aware that the Noise Monitoring system was a deterrent for residents reporting because there was the best part of an hour's delay between being able to spot something and then report it. In this day and age of instantaneous communication will he agree with me that such a delay is not proper and should be revised?

Reply:

I fail to understand why that is a deterrent from reporting, though I do understand that it is less than wholly satisfactory. There has to be some delay for terrorism and safety concerns, but not perhaps an hour and I will look into that and report back.

4. From Dr Mike Roddis, co-chair Kings Hall Safety Action Group (KHSAG) to the Environment and Community Services Portfolio Holder

Could you please explain why we have not received a reply from you to our letter of 30th April 2018 despite numerous attempts to follow it up on our part?

Reply:

I am sorry that you do not feel that you have been kept up to date. The situation has not changed since my meeting with you, so there is nothing to add. We are expecting the results of the traffic survey imminently. The parking scheme that was discussed with you is being designed and once it has been designed it will be shared. We are currently trying to increase the use of the pay and display spaces around Kent House Station. As we develop the Quietway plans further aspects are being considered, this includes the possibility of a zebra crossing in Kings Hall Road. At the moment all of those are under consideration and are being developed before we can come to any conclusions.

Supplementary question:

I see the Council's motto before me that enjoins you "To serve the people." When exactly will you give us the response that we require to our question?

Reply:

As I indicated, there are things in progress; when the drawings are finished and have been reviewed they will be shared with you. When we have the data and it has been analysed and we have reviewed it then we will be sharing conclusions with you.

5. From James Pattullo to the Renewal, Recreation and Housing Portfolio Holder

Many residents have been adversely impacted by the increase in larger noisy jet aircraft resulting from the increased operational hours. The annual income from

BHAL to LBB is over £150,000 short of the forecast when the extra hours were sanctioned. Why are the figures not published openly for all to see?

Reply:

The Council does not routinely publish individual income figures for specific properties that we own, and that includes Biggin Hill Airport. As you know though, because it has already been shared with you, the rental income the Council receives from the Airport is not a secret. For the record, in 2016/17, the Council received a total of £239,627, an increase of 9% from the previous year and 15% from the year before (2014/15), which represents a welcome increase.

Supplementary question:

Considering that income to the Council is not based on objective turnover at the airport, but on a certificate produced by the airport itself after making certain deductions, when was the last time that the Council had these certificates audited, which is allowed by the lease?

Reply:

Had I had notice of that question I would have discovered the answer. Now I have the question I will discover the answer and I will let you know.

6. From Julie Ireland to the Resources, Commissioning and Contract Management Portfolio Holder

In the elections on 3rd May 2018 how many people attended a polling station but were unable to vote because they did not have valid ID with them? Please provide the data broken down by polling station. ([Appendix 1](#))

Reply:

In total 154 electors who were recorded as having attended polling stations with either no ID or incorrect ID and they did not return to vote. Rather than read out details for all our polling stations which would take up most of the available time for public questions I have made copies of the individual polling station data available in the Chamber.

Supplementary question:

Could you please describe the method used for recording people who could not vote given that I personally and several of my colleagues were in attendance at all the polling stations that day to make a note of what method was used?

Reply:

There is a large sheet which details that information which is certainly going to be made available by the Returning Officer.

I just wanted to mention that, of that 154, that is considerably less than the number of people who spoiled their votes, to try to get that into context. Interestingly, if every one of those 154 who chose not to come back if they had come back and voted for the highest losing candidate it would not have affected any result at all at any of the elections right across the borough.

That information will be made available by the Returning Officer.

(At this point the time allowed for public questions expired, and the remainder of the questions received written replies.)

7. From Sarah Phillips to the Environment and Community Services Portfolio Holder

Can the Portfolio Holder explain/outline the timeline over the last 5 years, involved in issuing tender documents to obtain quotes for the cost of restoration work at the Croydon Road Recreation Ground and give details of the current state of play?

Reply:

The original tender cost was obtained in 2015, unfortunately that is no longer valid. We have recently retendered the work and received rather higher costs for the works. The prices though have been secured until summer 2019. A HLF bid would require community outcomes and additions to the costs but with the potential benefit of a grant.

8. From Dr Mike Roddis, co-chair Kings Hall Safety Action Group (KHSAG) to the Environment and Community Services Portfolio Holder

We are aware of an underspend in Bromley Council's environmental budget in the last financial year of £1,831,000 for 2017/18. Why was some of this budget not used for the development of an enforceable parking scheme and measures to combat speeding on Kings Hall Road (section 1-166)?

Reply:

As I have previously mentioned a white line and parking bay scheme is being designed for Kings Hall Road after concerns about bad parking were raised by residents. Schemes such as this have been very effective where used in other streets. All new schemes are monitored and should an indicative scheme be abused and bad parking continue, there is always the option for the Council to install yellow lines in place of the white lines.

A speed survey has been commissioned for Kings Hall Road to assess the suggestion that unusually high speeds are being driven.

Underspends are an indication of good management of the finances and cost pressures of the relevant area. The Council operates a one Council approach to finances and it is for the Council to take a cross Council view to balance the relative priorities of the many calls on its finances.

9. From Julie Ireland to the Children, Education and Families Portfolio Holder

14 academy schools in Bromley have decided not to have their Year 6 Sats moderated in the borough. Please identify these academies and state which authority they have chosen to use for their moderation.

Reply:

Assessment at the end of Key Stage 2 (in Year 6) is subject to two checking processes: moderation of teacher assessment of writing and monitoring of test administration. This year, 15 academy schools with children taking tests at Key Stage 2 chose to have teacher assessment moderated by a different local authority. Nine of these schools had monitoring provided by that authority and 6 used Bromley:

	School	Moderation	Monitoring
1.	Blenheim Primary School	Bexley	Bexley
2.	Castlecombe Primary School	Kent	Bromley
3.	Crofton Junior School	Kent	Bromley
4.	Hayes Primary School	Kent	Bromley
5.	Leesons Primary School	Kent	Bromley
6.	Midfield Primary School	Kent	Bromley
7.	Mottingham Primary School	Bexley	Bexley
8.	Pickhurst Academy	Croydon	Croydon
9.	Raglan Primary School	Greenwich	Greenwich
10.	Red Hill Primary School	Bexley	Bexley
11.	Scotts Park Primary School	Bexley	Bexley
12.	St Mary Cray Primary School	Kent	Bromley
13.	St Peter & St Paul Catholic Primary Academy	Greenwich	Greenwich
14.	Stewart Fleming Primary School	Bexley	Bexley
15.	Valley Primary School	Kent	Kent

10. From Sarah Phillips to the Environment and Community Services Portfolio Holder

What does the Council see as the future for the bandstand in Croydon Road Recreation Ground?

Reply:

We remain committed to working in partnership with the community to secure the funds needed to carry out the restoration works, which will ensure the bandstand is available for use by the local community for generations to come. It has always been our intention to submit a second HLF application based on feedback we received from HLF previously, however this will require a match funding financial commitment from the Council. At the current time we are unable to confirm Council funding and would encourage the community to continue to raise funds in support of the project.

11. From Dr Mike Roddis, co-chair Kings Hall Safety Action Group (KHSAG) to the Environment and Community Services Portfolio Holder

When will the zebra crossings be installed in Kings Hall Road that residents have repeatedly stressed are needed to address the dangers to our children and those

attending nearby schools face when crossing the road and indeed all other pedestrians?

Reply:

We are undertaking an assessment of the feasibility of including a zebra crossing on Kings Hall Road into the final design of the Quietway route.

12. From Julie Ireland to the Resources, Commissioning and Contract Management Portfolio Holder

At the Council meeting on 26 February 2018 the Resources Portfolio Holder said that only 68% of FOI requests between July and December 2017 had been answered within the regulatory 20 working day period.

Please provide further statistics stating the number of FOI requests received between 1/7/17 and 31/3/18, the number that were answered within 20 working days, the number that were answered between 21 and 60 working days, the number refused and the category of refusal, and the number that received no response.

Reply:

The statistics for the nine months up to 31st March 2018 are as follows –

Requests received	1,185
Answered within 20 working days	773
Answered beyond 20 working days	412
Refused	3*
No Response	0

This equates to a rate of about 65% of requests answered within 20 working days.

** The 3 requests refused entirely were on the grounds that it would take in excess of 18 hours to retrieve the information requested. There are other cases where part of the request was refused, but it is not possible to produce further detail without checking hundreds of individual requests.*

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Ward	P/D	Station Number	Station Name	No. that did not return to vote
Bromley Common & Keston	BC1	B1X	St. Luke's Church Hall, Raglan Road	2
	BC1	B2X	St. Luke's Church Hall, Raglan Road	1
	BC2	B3	Nettleton Hall, Bromley Common Baptist Church, Gravel Road	2
	BC3	B4X	South Room, Holy Trinity Church Rooms, Church Lane, Bromley Common	1
	BC3	B5X	South Room, Holy Trinity Church Rooms, Church Lane, Bromley Common	0
	BC4	B6X	Southborough Lane Baptist Church, Southborough Lane	3
	BC4	B7X	Southborough Lane Baptist Church, Southborough Lane	1
	BC5	B8	Keston Village Hall, Heathfield Road	2
Copers Cope	CC1	B9Y	Worsley Bridge Primary School, Brackley Road	1
	CC1	B10Y	Worsley Bridge Primary School, Brackley Road	0
	CC1	B11Y	Worsley Bridge Primary School, Brackley Road	1
	CC2	B12Y	St. George's Beckenham Church Hall, 25-27 Albemarle Road	0
	CC2	B13Y	St. George's Beckenham Church Hall, 25-27 Albemarle Road	0
	CC2	B14Y	St. George's Beckenham Church Hall, 25-27 Albemarle Road	0
	CC3	B15Y	Beckenham United Reformed Church Hall, Oakhill Road	1
	CC3	B16Y	Beckenham United Reformed Church Hall, Oakhill Road	0
	CC3	B17Y	Beckenham United Reformed Church Hall, Oakhill Road	0
Hayes & Coney Hall	HA1	B18	Pickhurst INFANT Academy, Pickhurst Lane	0
	HA2	B19	Victory Social Club, Kechill Gardens	0
	HA3	B20X	Hayes Free Church Hall, 111 Pickhurst Lane	2
	HA3	B21X	Hayes Free Church Hall, 111 Pickhurst Lane	0
	HA4	B22X	Hayes Village Hall, Hayes Street	1
	HA4	B23X	Hayes Village Hall, Hayes Street	1
	HA5	B24X	The Assembly Halls, 16-18 Gates Green Road, West Wickham	0
	HA5	B25X	The Assembly Halls, 16-18 Gates Green Road, West Wickham	0
	HA6	B26	Coney Hill Baptist Church, Coney Hill Road	2
Kelsey & Eden Park	KP1	B27X	Azelia Hall, 258 Croydon Road	1
	KP1	B28X	Azelia Hall, 258 Croydon Road	0
	KP2	B29X	St. Edmunds Church Hall, Village Way	0
	KP2	B30X	St. Edmunds Church Hall, Village Way	0
	KP3	B31Y	Marian Vian Primary School, Shirley Crescent	1
	KP3	B32Y	Marian Vian Primary School, Shirley Crescent	0
	KP3	B33Y	Marian Vian Primary School, Shirley Crescent	1
	KP4	B34Y	St. John's Eden Park Church Hall, 251 Eden Park Avenue	1
	KP4	B35Y	St. John's Eden Park Church Hall, 251 Eden Park Avenue	0
	KP4	B36Y	St. John's Eden Park Church Hall, 251 Eden Park Avenue	1
Shortlands	SH1	B37	St. Mary's Shortlands Church Hall, St. Mary's Avenue	-1
	SH2	B38X	St. Peter's Hall, Malmains Way	-1
	SH2	B39X	St. Peter's Hall, Malmains Way	2
	SH3	B40	Highfield Junior School, South Hill Road	1
	SH4	B41X	St. Mark's C.E. Primary School, Aylesbury Road	1
	SH4	B42X	St. Mark's C.E. Primary School, Aylesbury Road	1
West Wickham	WW1	B43	St. Francis Church Hall, Ravenswood Avenue	2
	WW2	B44X	The Hawes Down Centre, Hawes Lane	0
	WW2	B45X	The Hawes Down Centre, Hawes Lane	0
	WW3	B46X	Pickhurst JUNIOR Academy, Pickhurst Lane	1
	WW3	B47X	Pickhurst JUNIOR Academy, Pickhurst Lane	0
	WW4	B48Y	Emmanuel Church Hall, The Grove	0
	WW4	B49Y	Emmanuel Church Hall, The Grove	0
	WW4	B50Y	Emmanuel Church Hall, The Grove	3
Bickley	BK1	C1X	Scotts Park Primary School, Orchard Road	0
	BK1	C2X	Scotts Park Primary School, Orchard Road	2
	BK2	C3	Bullers Wood School, Chislehurst Road	0
	BK3	C4	St. Michael's Hall, Nightingale Lane, Bromley	2
	BK4	C5X	St. George's Bickley C.E. Primary School, Tylney Road	1
	BK4	C6X	St. George's Bickley C.E. Primary School, Tylney Road	0
	BK5	C7	St. George's Bickley Church Hall, Bickley Park Road	1
	BK6	C8X	23rd Bromley (St. Augustine Scout Hall), Homemead Road	1
	BK6	C9X	23rd Bromley (St. Augustine Scout Hall), Homemead Road	0

Bromley Town	BT1	C10	Valley Primary School, Beckenham Lane	1
	BT2	C11X	Christ Church Bromley, Highland Road	4
	BT2	C12X	Christ Church Bromley, Highland Road	0
	BT3	C13	Mobile Unit at the Pavilion, Queens Mead Recreation Ground	1
	BT4	C14	The Church Rooms, Bromley Parish Church, Church Road	2
	BT5	C15	Bickley Primary School, Nightingale Lane	0
	BT6	C16X	St. Mark's Bromley Church Room, Westmoreland Road	0
	BT6	C17X	St. Mark's Bromley Church Room, Westmoreland Road	2
	BT7	C18	St. Swithun's Bromley Church Hall, Fashoda Road	2
Chislehurst	CH1	C19	The Chislehurst Sports & Country Club, Elmstead Lane	1
	CH2	C20Y	Red Hill Primary School, Red Hill, Ghg	0
	CH2	C21Y	Red Hill Primary School, Red Hill, Ghg	1
	CH2	C22Y	Red Hill Primary School, Red Hill, Ghg	0
	CH3	C23X	Edgebury Primary School, Belmont Lane	1
	CH3	C24X	Edgebury Primary School, Belmont Lane	0
	CH4	C25Y	Chislehurst C.E. Primary School, School Road	3
	CH4	C26Y	Chislehurst C.E. Primary School, School Road	0
	CH4	C27Y	Chislehurst C.E. Primary School, School Road	0
	CH5	C28	St. Peter & St. Paul Catholic Primary Academy, St. Paul's Wood Hill	1
Cray Valley West	CW1	C29	Link Youth Centre, Midfield Way	0
	CW2	C30X	Gray's Farm Primary Academy, Gray's Farm Road	0
	CW2	C31X	Gray's Farm Primary Academy, Gray's Farm Road	3
	CW3	C32Y	Leesons Primary School, Leesons Hill	0
	CW3	C33Y	Leesons Primary School, Leesons Hill	0
	CW3	C34Y	Leesons Primary School, Leesons Hill	1
	CW4	C35Y	Poverest Adult Education College, Poverest Road	1
	CW4	C36Y	Poverest Adult Education College, Poverest Road	1
	CW4	C37Y	Poverest Adult Education College, Poverest Road	0
Mottingham & Chislehurst N	MO1	C38	Odd Fellows Hall, 6A Beaconsfield Road	0
	MO2	C39X	Castlecombe Children & Family Centre, Castlecombe Road	1
	MO2	C40X	Castlecombe Children & Family Centre, Castlecombe Road	1
	MO3	C41X	Mottingham Primary School, Entrance in Mottingham Road	1
	MO3	C42X	Mottingham Primary School, Entrance in Mottingham Road	3
	MO4	C43	Elmstead Baptist Church, Elmstead Lane	2
Plaistow & Sundridge	PS1	C44	Burnt Ash Children & Family Centre, Rangefield Road	-1
	PS2	C45X	St. Andrew's Bromley Church Hall, 134B Burnt Ash Lane	1
	PS2	C46X	St. Andrew's Bromley Church Hall, 134B Burnt Ash Lane	1
	PS3	C47X	Parish C.E. Primary School, London Lane	2
	PS3	C48X	Parish C.E. Primary School, London Lane	1
	PS4	C49X	Trinity Bromley United Reformed Church Hall, Freeland Road	1
	PS4	C50X	Trinity Bromley United Reformed Church Hall, Freeland Road	0
	PS5	C51X	Warwick Hall, St. Mary's C.E. Church, 61 College Road	0
	PS5	C52X	Warwick Hall, St. Mary's C.E. Church, 61 College Road	2
Biggin Hill	BH1	O1X	Oaklands Primary Academy, Oaklands Lane	0
	BH1	O2X	Oaklands Primary Academy, Oaklands Lane	0
	BH2	O3Y	St. Mark's Biggin Hill Church Hall, 10 Church Road	1
	BH2	O4Y	St. Mark's Biggin Hill Church Hall, 10 Church Road	3
	BH2	O5Y	St. Mark's Biggin Hill Church Hall, 10 Church Road	0
	BH3	O6	Biggin Hill Children & Family Centre, Sunningvale Avenue	3
Chelsfield & Pratts Bottom	CB1	O7X	St. Nicholas Church Hall, Leamington Avenue	1
	CB1	O8X	St. Nicholas Church Hall, Leamington Avenue	0
	CB2	O9X	Warren Road Primary School, Warren Road	1
	CB2	O10X	Warren Road Primary School, Warren Road	2
	CB3	O11X	The Chelsfield Centre, Windsor Drive	0
	CB3	O12X	The Chelsfield Centre, Windsor Drive	1
	CB4	O13	Chelsfield Village Hall, Bucks Cross Road	1
	CB5	O14X	St. Mary's Green Street Green Church Hall, Worlds End Lane	1
	CB5	O15X	St. Mary's Green Street Green Church Hall, Worlds End Lane	0
	CB6	O16	Pratts Bottom Village Hall, Norsted Lane	0

Cray Valley East	CE1	O17X	St. Paul's Cray C.E.Primary School, Buttermere Road	0
	CE1	O18X	St. Paul's Cray C.E.Primary School, Buttermere Road	0
	CE2	O19	Poverest Coronation Hall, Bridge Road, Orpington	1
	CE3	O20	Vernon Hall, Temple United Reformed Church, High Street	2
	CE4	O21	Manor Oak Primary School, Sweeps Lane/Blacksmith's Lane	0
	CE5	O22	Perry Hall Primary School, Perry Hall Road	1
	CE6	O23X	Orpington Sea Cadets, T S Whirlwind, Park Road	0
	CE6	O24X	Orpington Sea Cadets, T S Whirlwind, Park Road	2
Darwin	DA1	O25	Mobile Unit, The Car Park, The Common	1
	DA2	O26	Downe Village Hall, 24 High Street	1
	DA3	O27	Hazelwood Eldon Village Hall, 7 Spinney Way	0
	DA4	O28	Greenwood Centre, 4 High Street	0
	DA5	O29	Cudham C.E. Primary School, Jail Lane	0
	DA6	O30	Cudham Parish Hall, Cudham Lane South	0
	DA7	O31	Westerham Hill Baptist Church Hall, 432 Main Road, Westerham Hill	1
Farnborough & Crofton	FC1	O32X	St. Paul's Crofton Church Hall, Crofton Road	0
	FC1	O33X	St. Paul's Crofton Church Hall, Crofton Road	0
	FC2	O34	Acorn Lounge, Crofton Baptist Church, 100 Crofton Lane	0
	FC3	O35X	Crofton Halls, York Rise	1
	FC3	O36X	Crofton Halls, York Rise	0
	FC4	O37Y	Darrick Wood Infant School, Lovibonds Avenue	1
	FC4	O38Y	Darrick Wood Infant School, Lovibonds Avenue	0
	FC4	O39Y	Darrick Wood Infant School, Lovibonds Avenue	2
	FC5	O40	Tubbenden Primary School, Sandy Bury, Off Tile Farm Road	1
	FC6	O41	Farnborough Village Hall, High Street	5
Orpington	OR1	O42	All Saints Church Hall, Bark Hart Road	1
	OR2	O43	Harris Primary Academy Orpington, Dyke Drive	0
	OR3	O44X	Blenheim Children & Family Centre, Blenheim Road	1
	OR3	O45X	Blenheim Children & Family Centre, Blenheim Road	0
	OR4	O46X	Orpington Methodist Church Hall, Sevenoaks Road	1
	OR4	O47X	Orpington Methodist Church Hall, Sevenoaks Road	0
	OR5	O48	Bromley Beacon Academy, Avalon Road	0
	OR6	O49X	Christ Church Orpington, 165 Charterhouse Road	2
	OR6	O50X	Christ Church Orpington, 165 Charterhouse Road	3
Petts Wood & Knoll	PW1	O51X	Garden Estates Association Hall, 36 Woodhurst Avenue	1
	PW1	O52X	Garden Estates Association Hall, 36 Woodhurst Avenue	1
	PW2	O53	Crofton INFANT School, Towncourt Lane, Petts Wood	2
	PW3	O54Z	Petts Wood Memorial Hall, 200 Petts Wood Road	1
	PW3	O55Z	Petts Wood Memorial Hall, 200 Petts Wood Road	0
	PW3	O56Z	Petts Wood Memorial Hall, 200 Petts Wood Road	0
	PW3	O57Z	Petts Wood Memorial Hall, 200 Petts Wood Road	0
	PW4	O58X	St. John's United Reformed Church Hall, Lynwood Grove	0
	PW4	O59X	St. John's United Reformed Church Hall, Lynwood Grove	0
Clock House	CL1	L1X	Stewart Fleming Primary School, Entrance In Suffield Road	1
	CL1	L2X	Stewart Fleming Primary School, Entrance In Suffield Road	1
	CL2	L3	Avenue Road Baptist Church Hall, 94 Avenue Road	0
	CL3	L4X	Churchfields Primary School, Churchfields Road	0
	CL3	L5X	Churchfields Primary School, Churchfields Road	0
	CL4	L6X	Neighbourhood Church, 12 Cromwell Road	1
	CL4	L7X	Neighbourhood Church, 12 Cromwell Road	3
	CL5	L8	Beckenham Library, 22 Beckenham Road	4
Crystal Palace	CP1	L9	Sydenham Lawn Tennis Club, Springfield Road, Off Lawrie Park Road	4
	CP2	L10X	St. Paul's Anerley Church Hall, Hamlet Road	4
	CP2	L11X	St. Paul's Anerley Church Hall, Hamlet Road	1
	CP3	L12X	Anerley Town Hall, Anerley Road	0
	CP3	L13X	Anerley Town Hall, Anerley Road	1
	CP4	L14	Anerley Town Hall, Anerley Road	0

Penge & Cator	PE1	L15X	Holy Trinity Church Centre, 66 Lennard Road	0
	PE1	L16X	Holy Trinity Church Centre, 66 Lennard Road	0
	PE2	L17	Christ Central Church, Green Lane	0
	PE3	L18	Harris Aspire Academy, Lennard Road	0
	PE4	L19X	St. John's C.E. Primary School, Maple Road	1
	PE4	L20X	St. John's C.E. Primary School, Maple Road	3
	PE5	L21X	Kenilworth Church Hall, Kenilworth Road	0
	PE5	L22X	Kenilworth Church Hall, Kenilworth Road	2
	PE6	L23X	Melvin Hall, Melvin Road	0
	PE6	L24X	Melvin Hall, Melvin Road	0
TOTAL				154

COUNCIL MEETING

16TH JULY 2018

QUESTIONS FROM MEMBERS OF THE PUBLIC FOR WRITTEN REPLY

1. From Colin Willetts to the Resources, Commissioning and Contracts Portfolio Holder

With regard to the LBB local elections 2018, could you tell us if any of the postal votes returned were scrutinised/sampled for fraud, (i) if so how many? & (ii) in what wards?

Reply:

All postal vote packs which are returned are checked against key identifiers as a fraud prevention measure.

2. From Colin Willetts to the Leader of the Council

Following complaints/ reports from the residents of Swan Close that Councillor Hitchins does not live at his current electoral address this coupled with his failure to reply to emails sent & carry out any advice surgeries, where does he actually reside now on electoral role?

Reply:

Cllr Hitchins wishes to confirm that the register of interests correctly reflects his personal circumstances.

Cllr Hitchins has no record of any un-responded to correspondence.

Although not strictly Council business, it is a matter of record that the Conservatives hold a surgery in Cray Valley West every other Wednesday and are currently evaluating options to extend their offer to a Saturday morning surgery too.

They can of course always be contacted at other times by telephone, email or letter as residents prefer.

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COUNCIL MEETING

16TH JULY 2018

QUESTIONS FROM MEMBERS OF THE COUNCIL FOR ORAL REPLY

1. From Cllr Julian Benington to the Renewal, Recreation and Housing Portfolio Holder

West Camp, Biggin Hill is the former offices, barracks, messes, hangars and storage areas for the RAF who left the airfield and West Camp in 1992, 26 years ago. It was bought by Pentridge Properties, which company is effectively owned by Bernie Ecclestone, who used the hangars and some of the buildings for storage. Many of these buildings are Listed, but little or no maintenance has or is carried out on them, the whole site is a deteriorating eyesore and total waste.

In May 2017 a letter was sent to Pentridge Properties from this borough expressing an interest in purchasing the site. The reply received was that it had already been sold, but this sale fell through almost immediately. What steps have been or are being taken now to purchase this site?

Reply:

The Council wrote to Pentridge, who are the current owner of the property concerned, on 7 June stating that the Council is still interested in acquiring the above site so as to provide a sustainable reuse of the listed barrack buildings as an enterprise centre. To date we have not had a response.

Supplementary question:

In view of the deteriorating condition of the buildings, and the waste of the site, which is within the Mayor's Strategic Outer London Development Site, if the sale is refused or cannot be agreed will a compulsory purchase order be made to secure the site for commercial development, possibly including the new Aviation Training College planned by South East London Colleges?

Reply:

As regards the Aviation Training College that is no longer going on that site - it is going on another site provided by the Airport, so that is taken care of. However, I do not disagree with your sentiments with regard to these buildings. I myself have been pressing for some time to get a reply from Pentridge or to go down the compulsory purchase route. However, this is not always that simple and I will require legal advice as to whether we will succeed in doing that.

2. From Cllr David Jefferys to the Renewal, Recreation and Housing Portfolio Holder

Would the Portfolio Holder clarify who is responsible for controlling and monitoring the air space under 2,500 feet over Bromley for both fixed wing aircraft and helicopters?

Reply:

Unfortunately, it is not the Council's responsibility. Ultimately, this is a matter for Government and the Civil Aviation Authority (CAA). Controlled airspace can go from ground level to 66,000 feet in some cases, and 'air routes' can have bases down to 3,500 ft. Outside controlled airspace, aircraft can go anywhere so long as they abide by

the Rules of the Air. Specifically, relating to Biggin Hill, we have double checked the position with the CAA who confirm that Biggin Hill is within airspace G. The CAA website says "In the UK class G airspace is uncontrolled. This means there are no restrictions on which aircraft can enter it, what equipment the aircraft must carry, or the routes taken by the aircraft."

The CAA have said to us, "As long as pilots follow the published rules, they can largely operate autonomously."

The CAA have essentially confirmed to us that the Council does not have a role in routes below 2,500 feet, with the Airport in charge, in that sense, albeit within the existing regulatory framework, including the controls outlined in the Lease, which includes the Noise Action Plan.

Also, it is important to note that the Council does not have additional powers as a planning authority as some mistakenly believe.

Supplementary Question:

In the light of this answer, and the two earlier answers, can he bring forward a meeting with the CAA as soon as possible, or at least request such a meeting, so that these matters can be discussed.

Reply:

I will.

3. From Cllr Alexa Michael to the Environment and Community Services Portfolio Holder

When will the measures to control the speed and volume of traffic on Heathfield Road in Keston be implemented? What form will these measures take?"

Reply:

There are no plans in place to limit the volume of traffic using Heathfield Road in Keston. There are two measures to be installed to help limit the speed of drivers using Heathfield Road. The first is the installation of a virtual speed table at the junction with Keston Avenue. Before this could be installed, a new road surface had to be laid at this location. This new surface was installed some months ago and the surface is now settled such that the required road markings and surface dressing can be laid. The new Highways contract came online at the start of July and the road markings are now programmed to be laid sometime this month.

The other speed-reducing measure planned is for a gateway feature to be installed just south of Fishponds Road. This has taken time to bring to fruition as planning permission was required to place the signs on Commons land. It is expected that the gateway feature will be installed in September.

Supplementary Question:

Given that it is exactly five years since the first measurements of speed and traffic in Heathfield Road were taken does the Portfolio Holder think it is high time that action is now taken?

Reply:

As with all schemes we will undertake measurements of the effect to determine whether there is anything further that we can realistically achieve where road users are controlling their vehicles.

4. From Cllr Angela Wilkins to the Leader of the Council

Does he support the general principle practised across the corporate and public sectors that, when something goes horribly wrong inside the organisation, the person “with whom the buck stops” should take ultimate responsibility and resign (if not be sacked)?

Reply:

Cllr Wilkins has raised an interesting philosophical question which I have given some considerable thought to over the course of the weekend.

On reflection, it would probably depend on the circumstances, and also as to whether the individual in question could reasonably have been expected to know something was wrong, then neglected to do anything about it, or wilfully engaged in an action or policy which caused significant loss or damage to their business or other 3rd parties.

For example, were a Chancellor of the Exchequer to indulge in a series of 17 gold auctions and sell half the nation’s gold reserves at levels not seen in decades running up a loss to the public purse estimated to have cost British Tax payers somewhere in the region of £8 billion pounds, then yes, I would agree that a resignation, or indeed a sacking, would be highly appropriate.

Another example would be were a Prime Minister and most of his Cabinet to decide to engage in what many regard as being an illegal war based on a false premise concerning weapons of mass destruction, leading to the death of many thousands of innocent people, at further great cost to the British tax payer. That would certainly merit sacking, if not the criminal prosecution of those responsible.

But I have a strange feeling that these are not the issues which Cllr Wilkins wishes to address in her supplementary question to me this evening.

Supplementary Question:

Would he explain please how it is that, having been Portfolio Holder for Environmental Services responsible for Waste Services, Vinci, Streetworks to name a few, all of which had extremely bad Internal Audit reports and as a consequence of failures in that Department this Council lost in excess of £1.5m, how has it come about that he has been elevated to be Leader of the Council?

Reply:

I hope it comes down to the good judgement of my colleagues on this side of the Chamber understanding the facts of the matter rather than the so called facts that Cllr Wilkins continues to try to misrepresent. The Waste Service has long since been an outstanding service, one of the best in London, it beats the benchmarks and has been the source of great pride amongst this authority in terms of performance. The fault to which Cllr Wilkins refers had long been embedded into that contract, preceeding my arrival in-post, as soon as the fault was spotted (and it was spotted by Environmental Services) who alerted Internal Audit it was quickly put right, the fault corrected and the priority flags corrected within about fourteen months. I have not got much more to add

as the report is still being redacted and held back and I am sure that we will be discussing it again in the not-too-distant future.

Cllr Angela Wilkins raised a point of personal explanation stating that she had not misrepresented anything. The report was there, but unfortunately the public could not read it yet, and she was not mis-representing the audit at all. Councillor Colin Smith responded that there were on-going false reports about that audit; when the audit was reported the facts would be seen.

5. From Cllr Vanessa Allen to the Portfolio Holder for Environment and Community Services

Please describe the Council's policy for the implementation and enforcement of 20mph speed limits outside primary and secondary schools.

Reply:

20mph limits have been introduced outside 22 schools across the Borough, where a need has been identified; some of these are enforceable and some are highly visible advisory limits. In other locations, other types of warning signs have been installed, some electronic and some static. The school-time flashing advisory 20mph signs, introduced recently adjacent to three Borough schools are considered to be very effective at alerting drivers such that they adjust their speed accordingly.

The Council continues to monitor all schools, through our school travel planners, and will introduce whatever measures are deemed suitable to address safety issues or barriers to travel.

I should make clear that essentially the approach starts with the school and the School Travel Plan process to work out what is the best type of measure appropriate to that individual school in consultation with the school.

The Police are responsible for policing speed.

Supplementary Question:

I am interested to hear that the 20mph limit is enforced - I would like to know how it is enforced?

Reply:

I think I just said that the Police are responsible for policing speed.

6. From Cllr Kathy Bance MBE to the Leader of the Council

Bromley Youth Council are ambassadors for engaging with young people and they elected to have a young Mayor. The next stage in the process is for a white paper to be produced between the Chief Executive and the Leader of the Council. Can you give us an update on the status of this white paper?

Reply:

I am advised that there are issues involving the Council's constitution, finances and particularly concerns over safeguarding in the report which the Chief Executive is preparing. Those are the reasons that it is taking a little longer to prepare than he originally anticipated.

I am further advised that he will update you immediately that he has something more substantive to report.

7. From Cllr Josh King to the Portfolio Holder for Renewal, Recreation & Housing

Does the Portfolio Holder agree that 22 affordable homes completed in Bromley in a year is not acceptable, given the level of demand for housing within the Borough?

Reply:

The Council actively seeks to ensure the provision of affordable housing on all new developments in line with national guidance and development plan policy. The target is for 35% percent on-site affordable housing provision in Bromley on all sites of nine units or more. Payments in lieu of onsite provision are an exception when the independent assessment has confirmed that affordable on-site provision is not viable and the Council has used those contributions to provide additional accommodation for local people via Housing Associations.

During the past 5 years around 155 new affordable housing units have been delivered. Payments in lieu contributions have also secured a current pipeline of approximately 198 affordable housing units with our housing associations. The Council is actively seeking to increase supply through a range of activities across the housing market and to ensure the best use of existing affordable housing becoming available for re-lets to meet housing need.

Supplementary Question:

Will the Portfolio Holder support the Mayor of London's building Council homes for Londoners programme?

Reply:

Where this is possible and viable, yes; there are certain parts of his policy which I think will provide fewer homes and therefore I would not want to go down that route. We are certainly conscious of the need to provide more affordable homes and our policies will be producing this in months to come.

Additional Supplementary Question:

Councillor Simon Fawthrop asked whether the Portfolio Holder was aware that last year the Labour authorities of Brent, Haringey, Hackney, Merton and Harrow built zero affordable housing, and is he aware that, in saying that he has met the figures this year, it appears that the Mayor of London has been telling a few "porky pies?" It looks like he has been double counting some of the figures and has actually failed to meet some of his affordable housing targets for the last year. Does it not say that the Conservative way of doing things is the better way of doing things?

Reply:

I was not aware of that particular data, but I am not surprised. The Conservative way of doing things is to work with the grain of the market, not against it.

8. From Cllr Marina Ahmad to the Portfolio Holder for Education, Children and Families

How much extra, in pounds, has been spent on the Education, Children and Families budget since the damning OFSTED report in June 2016?

Reply:

The answer is £7,251k.

(Controllable budget in June 2016 totalled £32,938k, Controllable budget in May 2018 £40,189k.)

Supplementary Question:

Will he now agree that the direct correlation between increased spending on the service and the very welcome improvements that have taken place as a result proves that this budget was cut too far in recent years?

Reply:

One of the original findings in the report was that the money spent on Children's Services was not the driving issue - it was around management of that service. The process since that damning Ofsted report which we have always accepted and committed to improving that service and not just fixing it but changing the way that we provide Children's Services in this borough is making sure that the management structure and the systems are correct, and that has been the main focus. If you look at the independent reports that have come in, we have had seven monitoring visits from Ofsted and we have had numerous visits from the DfE. That has all looked at systems and processes. They have looked at things we are doing well, like the triple lock, bringing staff in from agency to be full time, better relationships with schools - which was highlighted in the last report - better working around child sexual exploitation and gangs. In none of those reports have they said that the cash going in to those services is an issue, so I think that the focus is going to be on getting things right, and when we have spoken to other local London authorities who have failed their Ofsted inspections that is the advice that we are providing, that it is around management systems - getting it right and making sure that children are at the heart of everything that we do.

9. From Cllr Simon Jeal to the Portfolio Holder for Resources, Commissioning and Contract Management

Could you please comment on Barnet Council's plan to take around 11 current outsourced services back in house and whether the problems they have faced could be risks to the London Borough of Bromley's commissioning model?

Reply:

Bromley Council has been an outsourcing authority since the late 1980s and has in excess of 500 plus contracts with third party providers. In all of that time, only 3 or 4 contracts have been brought back in-house and these have been relatively low value contracts.

The problems experienced by Barnet are likely to be because they outsourced a high number of contracts all at the same time, including back office professional services such as finance and strategic HR, which are the ones that have now been brought back in-house. Given the seven services returning back to the Council are corporate type services it would seem likely that Barnet failed to properly fully appreciate the need to retain a strong central Client and strategic corporate resources to properly manage those outsourced services.

Understanding and specifying in detail all services before market testing should ensure successful contracts are placed. Sufficient time is included in the commissioning timetable to allow for this to be done.

10. From Cllr Ian Dunn to the Portfolio Holder for Environment and Community Services

What is the Council doing to encourage Bromley Residents to participate in World Car Free day on Saturday 22 September?

Reply:

The Council promotes and supports a number of year-round initiatives to encourage children and adults to consider alternative means of transport to the car, where this is suitable to their circumstances. The Council does not plan any extra independent activities for World Car Free Day, however consistent with our approach to work with partners, we will assist partners activities on that day, for example with publicity. In the past, a number of schools in the Borough have chosen to take part and the Borough's School Travel Plan Advisers offered appropriate support to these schools at that time.

11. From Cllr Kevin Brooks to the Portfolio Holder for Renewal, Recreation & Housing

How will the Council support businesses in Penge as they transfer onto the Business Improvement District? Will the Portfolio Holder ensure that, despite the Town Centre Team ceasing, the Council will ensure retail in smaller high streets are promoted and protected?

Reply:

The Council is working with the new BID at Penge and has provided support through the retention of its specialist BID advisor, CMS, both the local authority and CMS were recently involved in the recruitment of the BID manager and will eventually hand over to the manager.

The Council continues to support smaller retail parades through the Small Parades programme aimed at delivering targeted improvements and enhancement to small parades in conjunction with local businesses. Applications for that money need to be endorsed by ward councillors and I would urge all councillors to encourage the development of such applications.

Supplementary Question:

We are just at the stage where we are about to turn over to the BID, Penge not really being on the Small Parades list but still being one of the smaller high streets compared to Bromley and Orpington. I want to know that, on the transition, the Council will still be providing advice and support so that the turnover will be successful because there are not a lot of ratepayers there, unlike Bromley High Street so we still need the Council behind us and supporting us, even if only morally.

Reply:

Indeed, we will endeavour to give whatever support we can as we did in the case of both Orpington and Bromley. In the immediate months after the appointment of the new BID manager there are always questions which arise and we will do our best to help.

12. From Cllr Tony Owen to the Portfolio Holder for Renewal, Recreation & Housing

The LBB Report DRR16/057 15th June 2016 promised to appoint a member of LBB staff to assist with monitoring the agreement with BHAL, paid for by BHAL. When is this appointment going to be announced, as residents need a Council officer with whom to raise their very many serious concerns?

Reply:

It is true that the report you refer to “proposed that a member of staff will be employed on a temporary contract” and for context it outlined that this was “to assist with monitoring, with costs for this and other related costs, such as expert advice, being met from ring-fencing the monies BHAL pay to the Council for their application costs.” Whereas the application costs are subject to ongoing discussions, be assured that monitoring is nevertheless taking place. Residents do need to report their noise complaint to the airport as previously advised but they can contact the Council and the details remain on the Council’s website www.bromley.gov.uk/bigginhillairport. Whilst it was not necessary to appoint someone initially, this is now under review.

Supplementary Question:

Will the Portfolio Holder emulate Rushmoor District Council who receive and post on their website half-yearly written monitoring reports from their local airport? In their case it is Farnborough.

Reply:

I can see no fundamental reason why we should not do that - as long as it is practical we will do it.

13. From Cllr Nicholas Bennett to the Portfolio Holder for Children, Education and Families

Will he make a statement of the Report by Christine Whatford into St Olave’s School?

Reply:

When we received this report it was very depressing and upsetting reading. There are personal statements from parents, pupils and teachers that cannot help but fill you with regret for the awful experience that these families faced. As Councillor Bennett is aware, on Wednesday we will be having a thorough session to accept this report, where we will have some further conversations about the detail.

What I would like to say is that I would like to thank Mrs Whatford for producing this thorough, independent report because it has shone a light on some dreadful practices at that school.

Supplementary Question:

It is indeed a truly shocking report which showed an unlawful admissions policy at Year 12 in not letting pupils back, which is contrary to law, and the inhumane way in which some of the pupils were then treated. The fact that £2m was in the reserves of the school and yet staff were refused money for essential things, and the fact that a company was set up to trade with China without any approval by the Governing body. This does show an appalling state of things and I am sure that the new chairman will do something to improve the situation. Would he join me in congratulating Tony Wright-Jones and Julian Grainger, who was our local authority governor, who both raised, on a number of occasions, problems with the school and got a stony response?

Reply:

What is clear in the report is that there had been concerns both from parents right across the board and the pressure that they exerted on the school and the issues they raised towards the end of the last academic year, sending a letter in to us which triggered the whole investigation, was absolutely useful in drawing this to a conclusion. So we thank all the parents and teachers who were involved.

(Councillor Neil Reddin declared an interest in this question as a former governor at St Olave's School.)

14. From Cllr Angela Wilkins to the Leader of the Council

How does he see the work of Audit Sub Committee developing over the forthcoming year and does he anticipate any areas of the Council's activities in which an audit (or an OFSTED inspection) would find similar serious failings as in the last 2-3 years?

Reply:

Audit Sub-Committee is a sub-committee of General Purposes and Licensing Committee; as such is a non-executive function.

Its strength relies upon its independence.

With that in mind Cllr wilkins should really direct any concerns you may have regarding its operation to Cllr Reddin to consider.

If I believed any area of the Council's operation was deficient in any way, I would instruct pro-active action to correct poor practice, rather than wait for Audit (or Ofsted) to confirm same.

Supplementary Question:

Would you agree with me, having made a point about Audit Sub-Committee needing to be independent, that it is not really appropriate to have a member of the Executive on Audit Sub-Committee, and in particular to have the Executive Portfolio Holder for Environment given the recent history of the major reports that have gone through the Sub-Committee and the findings and the costs of those findings to this Council?

Reply:

No, I would not. I think the presence of the Environment Portfolio Holder has been extremely helpful both in his current role and his previous role as PDS Chairman in keeping some sense of proportion around an escalating situation which was being exaggerated at that time. It could be, if Members wish there not to be an executive member on it that might be something we bring to the Constitution Improvement Working Group - I am relaxed about that. Insofar as the Portfolio Holder's presence is concerned, I think that it has been wholly positive.

15. From Cllr Vanessa Allen to the Portfolio Holder for Resources, Commissioning and Contract Management

Will he provide a breakdown of the costs of the recent voter ID pilot and of the monies paid for this pilot by the Cabinet office?

Reply:

The Cabinet Office is meeting all our costs associated with the Pilot of approximately £200k which includes additional staffing costs. The full breakdown is very detailed but could certainly be sent to Cllr Allen electronically.

(At this point, the time allowed for questions expired. The remainder of the questions received written replies.)

16. From Cllr Kathy Bance MBE to the Portfolio Holder for Renewal, Recreation & Housing

We learned recently that another of our Bromley Community Centres, Penge East Community Centre, is earmarked for development by Clarion Housing. They stated that no guarantee of a replacement Community Centre can be made. Will the London Borough of Bromley support our residents and community to ensure they provide a replacement Community Centre.

Reply:

In Planning terms, there is no planning application or proposal for this development so it is difficult to respond in specific terms. In general, under the Council's development plan policies, planning permission will be resisted for proposals that would lead to a loss of community facilities unless alternative provision is made or there is no longer a need.

17. From Cllr Josh King to the Portfolio Holder for Environment and Community Services

In May the UK was referred to the European Court of Justice for failing to tackle illegal levels of air pollution. Can the Portfolio Holder report when the most recent air quality figures for Bromley were recorded and what the readings were?

Reply:

The monitoring results from all sites need to be independently reviewed and verified prior to publication in an Annual Status Report (ASR).

The results for 2017/18 are currently being verified, however, the latest verified results are for the 2016-17 period. These were published in August 2017, and a copy available via Council web site

http://www.bromley.gov.uk/downloads/download/816/air_quality_annual_status_reports

The results of which are summarised below:

Bromley Council has 1 site at Harwood Avenue where the air quality is monitored on a continuous basis.

This site monitors levels of Nitrogen Dioxide (NO₂) and Particulate matter PM 10 and PM 2.5

The Pollutants Measured and their associated levels from this site are:

Pollutant Measured and Averaging period	Objective UK	Result for 2016-17	Achieved Y/N
NO ₂ 1 Hour Mean	200 µg m ⁻³ not to be exceeded more	No of hours exceeded = 0	Yes

	than 18 times a year		
NO2 Annual Mean	40 µg m-3	31.9 µg m-3	Yes
Particles - PM10 24 hour mean	50 µg m-3 not to be exceeded more than 35 times a year	No exceedances = 4 (35 allowed)	Yes
Particles PM10 Annual Mean	40 µg m-3	29.5 µg m-3	Yes
Particles PM 2.5	25 µg m-3	15.5 µg m-3	Yes

There are 8 additional sites where passive monitoring (using diffusion tubes) of NO2 is undertaken, the results of these sites are:

Site	Annual Mean Concentration (µgm-3)	40 µg m-3 Objective UK Achieved
1. Elmers End Road	68.8	No
2. London Road	52.4	No
3. Widmore Road	50.9	No
4. College Road	46.8	No
5. Homesdale Road	63.3	No
6. Anerly Hill	49.6	No
7. Anerly Road	47.9	No
8. Beckenham Road	47.9	No
9. Harwood Avenue	31.3	Yes

The annual mean concentrations for sites 1 -8 were not achieved.

18. From Cllr Marina Ahmad to the Portfolio Holder for Children, Education and Families

LBB still does not have a permanent Director of Education, despite advertising and interviewing one applicant. There is now a process of offering a secondment to Headteachers in the borough. Why has it been so difficult to attract the right person to the post?

Reply:

These posts are challenging to fill and other London authorities have needed more than one attempt. The post in Bromley is unusual in that it does not include either the school improvement work or the wider early help functions which are often included in the scope of similar posts in other areas, although the local emphasis on developing Bromley's SEN/D offer adds interest. Engaging recruitment consultants to search for suitably experienced candidates should increase the field.

19. From Cllr Simon Jeal to the Leader of the Council

Following the publication of the Government's LGBT action plan, what assessment will council officers and portfolio holders be carrying out to implement parts of the plan relevant to local authority services.

Reply:

The Council recognises and will continue to fulfil its legal obligations pursuant to the Equality Act 2010 including the public sector duty to 'foster good relations between people who share a protected characteristic (including sexuality) and those who do not'.

20. From Cllr Ian Dunn to the Leader of the Council

What progress has been made on the following motion agreed at the September 2017 Council Meeting?

"This Council re-confirms its commitment to the maximum possible levels of openness and transparency at all times. Council requests that a review be undertaken by Officers to be presented to the next meeting of the Constitution Improvement Working Group to establish how and whether this commitment might be better illustrated and publicised."

Reply:

I am advised that the Constitution Improvement Working Group received a report on transparency from the Director of Corporate Services at its meeting on 8th March 2018. Members did not make any recommendations to change our existing practices.

I am further advised that the Working Group's discussions focussed on part 1 (public) and part 2 (private) reports. The default position that we have followed for many years is that reports have to be published in part 1 of the agenda, unless senior officers consider there are very good reasons for them to be restricted to part 2. Even then, Members can challenge this and Committees can and do agree to bring part 2 reports into the public domain where they consider this does not cause harm to the Council or other interested parties.

Members will also be aware that in recent years we have encouraged the practice, where some information cannot be published, of providing reports in both parts 1 and 2, or providing a part 1 report with the restricted information in a part 2 appendix. In this way we maximise the information that is made available to the public and keep part 2 reports to a minimum.

21. From Cllr Kevin Brooks to the Portfolio Holder for Children, Education and Families

The Portfolio Holder has identified a small budget to support SACRE. Taking into account the extent of academisation in Bromley how does he feel this budget can most effectively be spent?

Reply:

I support the decision of the Bromley SACRE to use this resource for specialist educational advice to the SACRE so it can continue to fulfil its statutory duties. The priority this year is to review and refresh of the Bromley local Agreed Syllabus for RE, which is now 5 years old and therefore due for review. Of course, the Agreed Syllabus is available to all schools and many Bromley academies do use it.

22. Cllr Tony Owen to the Leader of the Council

What assessment have you made of the skills and talents of your Council colleagues? How do you ensure that they are deployed to the maximum benefit of local taxpayers (especially given the cost of over £1 million per year)? Is it sensible that 2 Councillors (Cllr Tickner and myself) with 69 years experience in local government between us have been denied our requested participation in the scrutiny process?

Reply:

I offered each of our new Councillors an opportunity to meet to discuss their personal strengths and preferences in terms of work commitments and areas of interest for Council responsibilities, an offer which most took up and I believe found quite helpful.

The only Councillors I can ensure are deployed to posts I deem they are best suited to are the Portfolio Holders as you are aware.

Whilst I genuinely sympathise with your frustration on a personal level, with every due respect, I do not think it is appropriate to discuss internal group arrangements in a public arena.

23. From Cllr Nicholas Bennett to the Leader of the Council

How much has been spent from the Growth Fund to support Skills and Enterprise Development in the Biggin Hill Strategic Outer London Development Area?

Reply:

I am advised zero.

24. From Cllr Angela Wilkins to Portfolio Holder for Adult Care & Health

Can the Portfolio Holder please comment on the implications of the recent report by the Local Government & Social Care Ombudsman which concluded that:-

"The Council failed to ensure Ms M's son, Mr N, could receive the level of care that he was entitled to. Mr N has lost out on provision and Ms M, who wanted to support him, has been caused distress and time and trouble. This has been made worse because although Ms M complained to the Council, it failed to deal with this complaint."

The report found *"Fault found causing injustice"* and recommended that the Council: *"pays £2,865 to reflect the time, trouble and distress it caused to Ms M and Mr N; and, apologises for the fault identified in this report."*

Reply:

The Council has openly acknowledged and since apologised for its failure in this instance as you will be aware.

Notwithstanding the fact that the Council's complaints system has been considerably strengthened since that time, the implication of this case is clearly that there might potentially still be others seeking resolution too.

With that in mind, as soon as I became aware of this particular issue and the LGO report, I immediately instructed the Director of Adult Social Care to organise an early

review of all outstanding complaints, likewise to confirm that all re-assessments are being completed in a timely fashion and that work is ongoing.

25. From Cllr Kathy Bance MBE to the Portfolio Holder for Public Protection and Enforcement

Bromley has again been blighted by trespassing Travellers and although, in Penge, no costly clean up was required, there were numerous accounts of loss of income and inconvenience to our traders and residents. Will Bromley Council commit funds to support practical engineering solutions, where possible, to stop this type of access?

Reply:

Yes. The Neighbourhood Management Street Enforcement Team has an ongoing programme of works which identifies areas of risk and provides well designed infrastructure to prevent access by unauthorised encampments. This work is funded by the Member's Initiative fund to support the reduction of fly-tipping. Notably, recent incursions onto Council land have occurred by the cutting of padlocks to already existing barriers and the removal of boundary posts that are placed to deter access. When weaknesses are identified, we work with our service providers to install or repair physical deterrents immediately.

26. From Cllr Josh King to the Portfolio Holder for Renewal, Recreation & Housing

How does the Portfolio Holder plan to house a greater proportion of those housed in temporary accommodation within the Borough?

Reply:

In accordance with legislation and statutory guidance, the Council seeks to accommodate households in or near to Bromley as far as is reasonably practicable. It is not reasonably practicable to provide accommodation within Bromley to every household to whom the Council owes a rehousing duty and there is an increasing need to secure accommodation that may be at some distance from the borough in order to meet the level and range of housing need. A risk and needs assessment is undertaken to ensure the suitability of all temporary accommodation placements. This includes prioritisation children at critical school age and those with particular support need for accommodation within the borough.

There are a range of activities being undertaken to secure a sufficient supply of suitable accommodation both in and outside of the borough

This includes:

- Prevention to assist as many people possible to remain in their existing home and thus not have to be placed in TA
- Securing alternative new home through the private rented sector
- Use of Bromley owned land and vacant buildings for new supply including for example the refurbishment of Manorfields and Bellegrove and current modular homes proposal
- Working with housing associations and private developers to secure new affordable homes
- Working with partners to secure local block booking and leasing schemes temporary accommodation placements.

- Making best use of existing housing stock to meet housing need – during 2017/18 364 homeless households were moved into permanent accommodation through the housing register.

27. From Cllr Nicholas Bennett to the Portfolio Holder for Renewal, Recreation and Housing

How many lockers at the Beckenham Spa Leisure Centre wet side changing rooms have no locks and the reasons why this is so?

Reply:

Mytime Active have advised that 68 out of 406 lockers are not working (17%). Mytime highlight that they are experiencing thefts and vandalism currently which is adding to the problem. They are working with the local police teams for prevention.

Mytime placed an order for 5k to repair all parts in mid-May but the supplier, Prospec, have given a 6 week lead time. Mytime have chased them and are hoping to have the parts by the end of the week finishing Friday 13th July.

In the long term Mytime report they are now ordering the parts monthly to try and beat the 6 week order times.

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COUNCIL MEETING

16TH JULY 2018

QUESTIONS FROM MEMBERS OF THE COUNCIL FOR WRITTEN REPLY

1. From Cllr Simon Fawthrop to the Environment and Community Services Portfolio Holder

For a written reply in tabular format please - can he list by Ward the number of Green Garden Waste bins currently in circulation and a similar figure for the previous year.

i.e.

	2017	2018
Biggin Hill	200	210

Reply:

(See Appendix 1 below)

Total number of Customers is: 26,420

Total number of Containers is: 27,152

This is a live snapshot in time of the number of customer / container on 07.06.2018 as a live database. As it's a live database a direct comparison figure with 2017 is not possible. As a comparator, in 2017 there were 25,723 Green Garden Waste Bins in circulation, representing 6% growth.

2. From Cllr Angela Wilkins to the Environment and Community Services Portfolio Holder

Please provide details of all default notices issued to Kier between 2014 and 2018 in relation to Crystal Palace ward.

Reply:

The table below (see Appendix 2) summarises the applied default notices issued to the service provider during the period requested. The table is caveated, as there was a period in 2015 whereby the system used to record client inspections experienced data corruption following a system platform change. However, the values applied contractually were retained, with 194 total defaults applied.

3. From Cllr Angela Wilkins to the Resources, Commissioning and Contract Management Portfolio Holder

Please provide details of how much has been spent by the council in terms of pension liabilities on contracts awarded since 2010.

Reply:

No variation to contract as a result of the 2016 triennial valuation. It is important to note that these costs can reduce as well as increase as a result of future actuarial valuations. A sum of £33k p.a has been paid to contractors to cover the cost of providing a pension bond.

No payments have been made by the Council with regard to pension liabilities. A sum of £203k was set aside in an earmarked reserve in 2017/18 (full-year effect of £347k from 2018/19) to mitigate against the risk of any future liabilities that may arise relating to the TFM, Libraries and ISD contracts.

4. From Cllr Kathy Bance MBE to the Public Protection and Enforcement Portfolio Holder

Can you please advise the number of mobile and fixed CCTV units Bromley has at its disposal and how many of those were purchased recently?

We have two hotspots where the police would like CCTVs returned because the problems had stopped whilst the CCTVs were in place but theft and ASB have returned in those areas.

Reply:

The number of cameras deployed will be dependent on the number of cameras (both mobile and fixed) that require repair, as they are taken out of service as and when technical issues arise, or are decommissioned due to being deemed beyond repair.

On average 2 mobile cameras are purchased each year.

There is a waiting list for the deployment of mobile cameras. Helen Andrews in Community Safety manages the deployment of mobile CCTV cameras as well as the waiting list. The Police are aware of this system, and they submit requests as and when area issues arise. Ordinarily, specific briefs are submitted with these requests (e.g. to gather evidence of ASB), however, due to the demand for this resource, they cannot be deployed on an indefinite basis.

5. From Cllr Kathy Bance MBE to the Children, Education and Families Portfolio Holder

At a recent public meeting I was challenged about the lack of information available about activities in Bromley for children/youths. LBB website that lists activities does not appear to be kept updated. Whose responsibility is it to update this? Is the website outdated now as an information tool for young people? Are there any plans to modernise the system to engage better with our young people.

Reply:

The Bromley.gov.uk website is maintained by Liberata, this contract is managed by the Head of Customer Services. Departments are responsible for providing updates through to both to ensure that information is kept up to date. It's worth noting however that until August 2018 there is a 'content freeze' in place because of systems upgrade. A corporate project is also underway to look at all content to improve the website.

In regards to engagement with Young People. Through the Bromley Youth Support Programme the Council provides a range of information and signposting about the activities that are available across the borough. The 'Young Bromley' section includes links to out of school activities, a directory of local organisations, details of the borough's four Youth Hubs and information regarding young people's organised activities – see www.bromley.gov.uk/info/200104/young_bromley. This sits alongside the general Events list on the Council website, see www.bromley.gov.uk/events.

Furthermore the Bromley Youth Activities Facebook page provides further information on targeted events and activities, see www.facebook.com/BromleyYouthActivities.

The Council previously had a dedicated website; however, this was decommissioned and the information was included within the Council website.

6. From Cllr Kathy Bance MBE to the Renewal, Recreation & Housing Portfolio Holder

How many residents from our housing waiting list have been permanently housed in Bromley in the past 12 months. How many of those placed were housed in mobility specifically adapted properties in Bromley?

Reply:

During the last financial year 487 households were permanently rehoused through the housing register. Of these 2 were fully adapted and 19 were partially adapted.

7. From Cllr Ian Dunn to the Resources, Commissioning and Contract Management Portfolio Holder

Please provide the number of electors per ward, with postal voters shown separately, as of the initial issue of the 17/18 register and the register used on polling day.

Reply:

The following table sets out the information requested - see [Appendix 3](#) below.

8. From Cllr Nicholas Bennett to the Children, Education and Families Portfolio Holder

What response has been made by the Council to the Government's questionnaire on Home Education?

Reply:

The questionnaire has been completed and submitted. (Copy attached as [Appendix 4.](#))

9. From Cllr Nicholas Bennett to the Renewal, Recreation and Housing Portfolio Holder

What design advice is given to applicants seeking to provide high density housing in Town Centres so as not to undermine the quality of life for existing residents and users?

Reply:

Applicants for planning permission are advised to comply with the Council's Planning Policies including those relevant to design. In addition they are advised to adhere to Supplementary Planning Guidance. The relevant policies are contained in the UDP/Local Plan, Bromley Town Centre Area Action Plan and the London Plan. The Council's Supplementary Planning Guidance includes General Design Principles and Residential Design Guidance.

10. From Cllr Nicholas Bennett to the Environment and Community Services Portfolio Holder

What action is proposed to tackle the outbreak of fly posted advertising stickers on shop fronts in West Wickham and Bromley Town Centres?

Reply:

The cleansing of flyposting is operated on request when reported by residents or business owners. The cleansing service manager has instructed the service provider to review the area and remove public facing fly posting incidents. In terms of potential enforcement of these occurrences, the Street Enforcement team can be contacted with their details of the incident and the details of what is written on the sticker. A Street Enforcement officer will then be assigned to investigate the complaint to determine if sufficient information is available to pursue a viable prosecution. If there is sufficient evidence, a statement from the shop owner or witness will be required confirming that permission was not given by them to those persons / company putting these stickers in their shopfronts and evidence will be assembled for court action.

Appendix D - Appendices

QUESTIONS FROM COUNCILLORS FOR WRITTEN REPLY - APPENDICES

Appendix 1 (Question 1)

Count of Green Garden Waste			
Ward Description	GW Number of Containers	Total Customers	Total Containers
Bickley	1	1425	1425
	2	64	128
	3	5	15
	4	2	8
Bickley Total		1496	1576
Biggin Hill	1	710	710
	2	12	24
Biggin Hill Total		722	734
Bromley Common and Keston	1	1230	1230
	2	31	62
	3	6	18
	6	1	6
Bromley Common and Keston Total		1268	1316
Bromley Town	1	1043	1043
	2	27	54
	3	1	3
Bromley Town Total		1071	1100
Chelsfield and Pratts Bottom	1	1685	1685
	2	37	74
	3	2	6
Chelsfield and Pratts Bottom Total		1724	1765
Chislehurst	1	1556	1556
	2	70	140
	3	8	24
	4	3	12
Chislehurst Total		1637	1732
Clock House	1	664	664
	2	5	10
Clock House Total		669	674
Copers Cope	1	659	659
	2	38	76
	3	1	3
	4	1	4
Copers Cope Total		699	742
Cray Valley East	1	837	837
	2	9	18
Cray Valley East Total		846	855
Cray Valley West	1	1097	1097
	2	18	36
Cray Valley West Total		1115	1133

Crystal Palace	1	159	159
	2	6	12
Crystal Palace Total		165	171
Darwin	1	365	365
	2	15	30
	3	3	9
Darwin Total		383	404
Farnborough and Crofton	1	1954	1954
	2	46	92
	3	2	6
Farnborough and Crofton Total		2002	2052
Hayes and Coney Hall	1	2129	2129
	2	28	56
Hayes and Coney Hall Total		2157	2185
Kelsey and Eden Park	1	1039	1039
	2	23	46
	3	1	3
Kelsey and Eden Park Total		1063	1088
Mottingham and Chislehurst North	1	496	496
	2	8	16
	4	1	4
Mottingham and Chislehurst North Total		505	516
Orpington	1	2037	2037
	2	26	52
	4	1	4
Orpington Total		2064	2093
Penge and Cator	1	566	566
	2	11	22
	3	1	3
Penge and Cator Total		578	591
Petts Wood and Knoll	1	2307	2307
	2	62	124
Petts Wood and Knoll Total		2369	2431
Plaistow and Sundridge	1	940	940
	2	28	56
	3	1	3
Plaistow and Sundridge Total		969	999
Shortlands	1	1004	1004
	2	47	94
	3	2	6
Shortlands Total		1053	1104
West Wickham	1	1839	1839
	2	26	52
West Wickham Total		1865	1891
Grand Total		26420	27152

Appendix 2 (Question 2)

Date	Street	Grade	Type	Feature
11-Jul-14	ANERLEY PARK	C	schedule	foot
04-Aug-14	ANERLEY PARK	D	schedule	foot
24-Sep-14	ANERLEY PARK	D	deepclean	mech(post-clean weekly)
26-Sep-14	ANERLEY PARK	D	schedule	foot
03-Oct-14	ANERLEY PARK	C	schedule	foot
23-Oct-14	ANERLEY PARK	C	deepclean	mech(post-clean weekly)
20-Nov-14	ANERLEY PARK	D	deepclean	mech(post-clean weekly)
06-May-16	ANERLEY PARK	C	Schedule	grade_foot
25-Oct-16	ANERLEY PARK	C	Schedule	grade_foot
06-Dec-16	ANERLEY PARK	C	Schedule	grade_foot
20-Dec-16	ANERLEY PARK	C-	Grade_Failure	grade_foot
24-Jan-17	ANERLEY PARK	C-	Grade_Failure	grade_foot
31-Jan-17	ANERLEY PARK	D	Grade_Failure	grade_foot
07-Feb-17	ANERLEY PARK	C	Grade_Failure	grade_foot
23-Oct-14	ANERLEY PARK ROAD	C	deepclean	mech(post-clean weekly)
20-Nov-14	ANERLEY PARK ROAD	D	deepclean	mech(post-clean weekly)
24-Sep-14	ANERLEY ROAD	C	schedule	foot
07-Oct-14	ANERLEY ROAD	C	schedule	foot
07-Feb-17	ANERLEY ROAD	D	Schedule	grade_foot
01-Mar-17	ANERLEY ROAD	C	Grade_Failure	grade_foot
19-Apr-17	ANERLEY ROAD	C-	Grade_Failure	grade_foot
03-Oct-14	ANERLEY VALE	C	schedule	foot
03-Oct-14	BEVERLEY ROAD	D	schedule	foot
24-Oct-14	BEVERLEY ROAD	C	schedule	foot
28-Oct-14	BEVERLEY ROAD	C	schedule	mech
28-Oct-14	BEVERLEY ROAD	C	schedule	foot
11-Nov-14	BEVERLEY ROAD	C	schedule	foot
27-Jan-17	BEVERLEY ROAD	C	Schedule	grade_foot
30-Jun-14	BORDER CRESCENT	C	schedule	foot
27-Aug-14	BORDER CRESCENT	D	deepclean	foot(post-clean weekly)
20-Dec-16	BORDER CRESCENT	C	Schedule	grade_foot
20-Jan-17	BORDER CRESCENT	D	Schedule	grade_foot
24-Jan-17	BORDER CRESCENT	D	Grade_Failure	grade_foot
02-May-14	BRUNSWICK PLACE	C	schedule	foot
05-Aug-14	BRUNSWICK PLACE	C	schedule	foot
08-Aug-14	BRUNSWICK PLACE	C	schedule	foot
03-Oct-14	BRUNSWICK PLACE	C	schedule	foot
07-Nov-14	BRUNSWICK PLACE	C	schedule	foot
11-Nov-14	BRUNSWICK PLACE	C	schedule	foot
13-Dec-16	BRUNSWICK PLACE	C	Schedule	grade_foot

21-Oct-16	CASTLEDINE ROAD	C	Schedule	grade_foot
24-Jan-17	CASTLEDINE ROAD	C	Schedule	grade_foot
04-Jun-14	CROYDON ROAD	C	schedule	foot
16-Jun-14	CROYDON ROAD	C	schedule	foot
16-Jun-14	CROYDON ROAD	C	schedule	mech
27-Jun-14	CROYDON ROAD	C	schedule	foot
08-Jul-14	CROYDON ROAD	C	schedule	foot
14-Jul-14	CROYDON ROAD	C	schedule	foot
17-Jul-14	CROYDON ROAD	C	schedule	foot
30-Jul-14	CROYDON ROAD	C	schedule	foot
31-Jul-14	CROYDON ROAD	C	schedule	foot
01-Aug-14	CROYDON ROAD	C	schedule	foot
04-Aug-14	CROYDON ROAD	C	schedule	foot
04-Aug-14	CROYDON ROAD	C	schedule	foot
08-Aug-14	CROYDON ROAD	C	schedule	foot
19-Aug-14	CROYDON ROAD	C	schedule	foot
02-Sep-14	CROYDON ROAD	C	schedule	foot
05-Sep-14	CROYDON ROAD	C	schedule	foot
08-Sep-14	CROYDON ROAD	C	schedule	foot
29-Sep-14	CROYDON ROAD	C	schedule	foot
30-Sep-14	CROYDON ROAD	C	schedule	foot
30-Sep-14	CROYDON ROAD	C	schedule	foot
03-Oct-14	CROYDON ROAD	C	schedule	foot
06-Oct-14	CROYDON ROAD	C	schedule	foot
08-Oct-14	CROYDON ROAD	C	schedule	foot
08-Oct-14	CROYDON ROAD	C	schedule	foot
08-Oct-14	CROYDON ROAD	C	schedule	foot
10-Oct-14	CROYDON ROAD	C	schedule	foot
24-Oct-14	CROYDON ROAD	C	schedule	foot
28-Oct-14	CROYDON ROAD	C	schedule	mech
28-Oct-14	CROYDON ROAD	C	schedule	foot
07-Nov-14	CROYDON ROAD	C	schedule	foot
11-Nov-14	CROYDON ROAD	C	schedule	mech
11-Nov-14	CROYDON ROAD	C	schedule	foot
12-Feb-16	CROYDON ROAD	C	Schedule	grade_foot
22-Apr-16	CROYDON ROAD	D	Grade_Failure	grade_foot
18-Oct-16	CROYDON ROAD	C	Schedule	grade_foot
28-Oct-16	CROYDON ROAD	C	Schedule	grade_mech
06-Dec-16	CROYDON ROAD	C	Schedule	grade_foot
13-Dec-16	CROYDON ROAD	C	Grade_Failure	grade_foot
15-Dec-16	CROYDON ROAD	C-	Schedule	grade_foot
20-Dec-16	CROYDON ROAD	C	Grade_Failure	grade_foot
17-Jan-17	CROYDON ROAD	C	Grade_Failure	grade_foot
27-Jan-17	CROYDON ROAD	C	Schedule	grade_foot
31-Jan-17	CROYDON ROAD	C	Grade_Failure	grade_foot

21-Feb-17	CROYDON ROAD	C-	Schedule	grade_foot
14-Mar-17	CROYDON ROAD	C	Grade_Failure	grade_foot
28-Mar-17	CROYDON ROAD	C-	Grade_Failure	grade_foot
09-May-17	CROYDON ROAD	D	Grade_Failure	grade_foot
15-Jul-14	CRYSTAL PALACE PARADE	C	schedule	foot
05-Aug-14	CRYSTAL PALACE PARADE	C	schedule	foot
04-Sep-14	CRYSTAL PALACE PARADE	C	schedule	foot
24-Sep-14	CRYSTAL PALACE PARADE	C	schedule	foot
28-Nov-14	CRYSTAL PALACE PARADE	C	schedule	foot
31-Jan-17	CRYSTAL PALACE PARADE	D	Schedule	grade_foot
09-May-17	CRYSTAL PALACE PARADE	C	Grade_Failure	grade_foot
05-Aug-14	CRYSTAL PALACE PARK ROAD	C	schedule	foot
08-Aug-14	CRYSTAL PALACE PARK ROAD	C	schedule	foot
28-Aug-14	CRYSTAL PALACE PARK ROAD	C	schedule	foot
01-Sep-14	CRYSTAL PALACE PARK ROAD	D	schedule	foot
02-Sep-14	CRYSTAL PALACE PARK ROAD	D	weekend	foot(post-clean weekend)
26-Sep-14	CRYSTAL PALACE PARK ROAD	C	schedule	foot
03-Oct-14	CRYSTAL PALACE PARK ROAD	C	schedule	foot
20-Jan-17	CRYSTAL PALACE PARK ROAD	C	Schedule	grade_foot
28-Mar-17	CRYSTAL PALACE PARK ROAD	C	Schedule	grade_foot
24-Jan-17	CRYSTAL PALACE STATION ROAD	C	Schedule	grade_foot
01-Aug-14	DERWENT ROAD	C	schedule	foot
04-Aug-14	DERWENT ROAD	C	schedule	mech
04-Aug-14	DERWENT ROAD	C	schedule	foot
08-Aug-14	DERWENT ROAD	C	schedule	foot
19-Aug-14	DERWENT ROAD	D	schedule	foot
01-Sep-14	DERWENT ROAD	C	schedule	mech
01-Sep-14	DERWENT ROAD	C	schedule	foot
02-Sep-14	DERWENT ROAD	C	weekend	mech(post-clean weekend)
24-Oct-14	DERWENT ROAD	C	schedule	foot
28-Oct-14	DERWENT ROAD	C	schedule	mech
25-Nov-14	DERWENT ROAD	C	schedule	mech
17-Jan-17	DERWENT ROAD	C	Schedule	grade_mech
27-Jan-17	DERWENT ROAD	C	Schedule	grade_foot
14-Feb-17	DERWENT ROAD	C	Schedule	grade_foot
14-Feb-17	DERWENT ROAD	C	Grade_Failure	grade_mech
24-Mar-17	DERWENT ROAD	C	Grade_Failure	grade_foot
07-Oct-14	GEORGE GROVES ROAD	C	schedule	foot
05-Aug-14	HADLOW PLACE	C	schedule	foot
08-Aug-14	HADLOW PLACE	C	schedule	foot
03-Oct-14	HADLOW PLACE	C	schedule	foot
07-Nov-14	HADLOW PLACE	C	schedule	foot
25-Nov-14	HADLOW PLACE	C	schedule	foot
29-Sep-14	HAMLET ROAD	C	schedule	foot

11-Nov-14	HAMLET ROAD	C	schedule	mech
11-Nov-14	HAMLET ROAD	C	schedule	foot
24-Jan-17	HAMLET ROAD	D	Schedule	grade
22-Jan-16	HAYSLEIGH GARDENS	C	Schedule	grade_foot
22-Apr-16	HAYSLEIGH GARDENS	C	Grade_Failure	grade_foot
27-Jan-17	HAYSLEIGH GARDENS	C-	Schedule	grade_foot
09-May-17	HAYSLEIGH GARDENS	C	Schedule	grade_foot
28-Aug-14	LAWRIE PARK ROAD	C	schedule	foot
24-Jan-17	LEDINGTON ROAD	D	Schedule	grade_foot
24-Jan-17	LEDINGTON ROAD	D	Schedule	grade
05-Aug-14	LULLINGTON ROAD	C	schedule	foot
02-May-14	MABERLEY ROAD	C	schedule	foot
20-May-14	MABERLEY ROAD	D	schedule	foot
29-Sep-14	MABERLEY ROAD	C	schedule	mech
13-Dec-16	MABERLEY ROAD	C	Schedule	grade_foot
24-Jan-17	PALACE ROAD	C	Schedule	grade_foot
24-Jan-17	PLEYDELL AVENUE	C	Schedule	grade
23-Apr-14	RIDSDALE ROAD	C	schedule	foot
24-Apr-14	RIDSDALE ROAD	C	schedule	foot
28-Apr-14	RIDSDALE ROAD	C	schedule	foot
25-Jun-14	RIDSDALE ROAD	C	schedule	foot
04-Aug-14	RIDSDALE ROAD	C	schedule	mech
04-Aug-14	RIDSDALE ROAD	D	schedule	foot
20-Oct-14	RIDSDALE ROAD	C	schedule	foot
21-Oct-14	RIDSDALE ROAD	C	schedule	foot
13-Jul-16	RIDSDALE ROAD	C-	Schedule	grade_foot
22-Jul-16	RIDSDALE ROAD	C	Grade_Failure	grade_foot
13-Dec-16	RIDSDALE ROAD	C	Schedule	grade_foot
01-Mar-17	RIDSDALE ROAD	C	Schedule	grade_foot
19-Apr-17	RIDSDALE ROAD	C-	Grade_Failure	grade_foot
28-Oct-14	SELBY ROAD	C	schedule	mech
25-Nov-14	SELBY ROAD	C	schedule	mech
18-Oct-16	SELBY ROAD	C	Schedule	grade_foot
01-Nov-16	SELBY ROAD	C	Grade_Failure	grade_foot
15-Nov-16	SELBY ROAD	D	Grade_Failure	grade_foot
06-Dec-16	SELBY ROAD	D	Grade_Failure	grade_foot
20-Dec-16	SELBY ROAD	C-	Grade_Failure	grade_foot
27-Jan-17	SELBY ROAD	C	Schedule	grade_foot
14-Feb-17	SELBY ROAD	C	Schedule	grade_mech
14-Feb-17	SELBY ROAD	C	Grade_Failure	grade_foot
24-Mar-17	SELBY ROAD	D	Grade_Failure	grade_foot
21-Apr-17	SELBY ROAD	D	Grade_Failure	grade_foot
28-Oct-14	SEYMOUR VILLAS	C	deepclean	mech(post-clean weekly)
28-Oct-14	SEYMOUR VILLAS	C	deepclean	foot(post-clean weekly)

18-Nov-16	SEYMOUR VILLAS	C	Schedule	grade_foot
28-Aug-14	SYDENHAM AVENUE	C	deepclean	mech(post-clean weekly)
28-Aug-14	SYDENHAM AVENUE	C	deepclean	foot(post-clean weekly)
24-Sep-14	THICKET ROAD	D	deepclean	mech(post-clean weekly)
26-Sep-14	THICKET ROAD	C	schedule	foot
23-Oct-14	THICKET ROAD	C	deepclean	mech(post-clean weekly)
20-Nov-14	THICKET ROAD	C	deepclean	mech(post-clean weekly)
19-Apr-16	THICKET ROAD	C	Schedule	grade_foot
15-Jul-16	THICKET ROAD	C	Schedule	grade_foot
21-Oct-16	THICKET ROAD	C	Grade_Failure	grade_foot
06-Dec-16	THICKET ROAD	C	Schedule	grade_foot
20-Dec-16	THICKET ROAD	D	Grade_Failure	grade_foot
31-Jan-17	THICKET ROAD	C	Grade_Failure	grade_foot
14-Mar-17	THICKET ROAD	C	Grade_Failure	grade_foot
12-Dec-16	TOWER CLOSE	C	Schedule	grade_mech
23-May-14	TRENHOLME CLOSE	C	schedule	foot
11-Jul-14	TRENHOLME CLOSE	C	schedule	foot
03-Oct-14	TRENHOLME CLOSE	C	schedule	foot
03-Oct-14	TRENHOLME ROAD	C	schedule	foot
23-May-14	TRENHOLME TERRACE	C	schedule	foot
11-Nov-14	VERSAILLES ROAD	C	schedule	foot
19-Nov-14	VERSAILLES ROAD	C	deepclean	mech(post-clean weekly)
28-Oct-14	WADHURST CLOSE	C	schedule	mech
25-Nov-14	WADHURST CLOSE	C	schedule	mech
27-Jan-17	WADHURST CLOSE	C	Schedule	grade_foot
03-Oct-14	WALDEGRAVE ROAD	C	schedule	foot
07-Nov-14	WALDEGRAVE ROAD	C	deepclean	foot(pre-clean weekly)
11-Nov-14	WALDEGRAVE ROAD	C	schedule	foot
25-Nov-14	WALDEGRAVE ROAD	C	schedule	foot
13-Dec-16	WALDEGRAVE ROAD	C	Schedule	grade_foot
30-May-14	WEIGHTON ROAD	C	schedule	foot
10-Jun-14	WEIGHTON ROAD	C	schedule	foot
13-Jun-14	WEIGHTON ROAD	C	schedule	foot
08-Aug-14	WEIGHTON ROAD	C	schedule	foot
24-Oct-14	WEIGHTON ROAD	C	schedule	foot
28-Oct-14	WEIGHTON ROAD	C	schedule	foot
07-Nov-14	WEIGHTON ROAD	C	schedule	foot
17-Jan-17	WEIGHTON ROAD	C	Schedule	grade_foot
27-Jan-17	WEIGHTON ROAD	C	Schedule	grade_foot
14-Feb-17	WEIGHTON ROAD	C	Grade_Failure	grade_foot
24-Mar-17	WEIGHTON ROAD	C	Grade_Failure	grade_foot
31-Jan-17	WESTWOOD HILL	D	Schedule	grade_foot
01-Oct-14	WILLIAM BOOTH ROAD	C	schedule	foot

07-Oct-14	WILLIAM BOOTH ROAD	C	schedule	foot
05-Nov-14	WILLIAM BOOTH ROAD	C	schedule	foot
21-Dec-16	WILLIAM BOOTH ROAD	C	Schedule	grade_foot
18-Jan-17	WILLIAM BOOTH ROAD	C	Grade_Failure	grade_foot
19-Apr-17	WILLIAM BOOTH ROAD	C-	Grade_Failure	grade_foot

Appendix 3 (Question 7)

Ward	1 December 2017			3 May 2018		
	Polling Station	Postal Voters	Total Electorate	Polling Station	Postal Voters	Total Electorate
Bickley	9508	2170	11678	9482	2196	11678
Biggin Hill	6891	984	7875	6839	1000	7839
Bromley Common & Keston	10588	2106	12694	10598	2084	12682
Bromley Town	11216	2020	13236	11234	2041	13275
Chelsfield & Pratts Bottom	9534	1715	11249	9396	1746	11142
Chislehurst	9648	2386	12034	9627	2384	12011
Clock House	10315	1583	11898	10246	1634	11880
Copers Cope	10250	2095	12345	10391	2160	12551
Cray Valley East	9555	1901	11456	9570	1887	11457
Cray Valley West	10542	1634	12176	10490	1608	12098
Crystal Palace	7905	1100	9005	7978	1104	9082
Darwin	3472	673	4145	3428	695	4123
Farnborough & Crofton	9687	2036	11723	9589	2059	11648
Hayes & Coney Hall	10752	1917	12669	10671	1933	12604
Kelsey and Eden Park	10378	2029	12407	10301	2033	12334
Mottingham & Chislehurst North	6413	870	7283	6442	864	7306
Orpington	10317	1871	12188	10203	1907	12110
Penge and Cator	10945	1459	12404	10982	1490	12472
Petts Wood & Knoll	9027	1714	10741	8905	1741	10646
Plaistow & Sundridge	10071	1532	11603	10065	1572	11637
Shortlands	6461	1253	7714	6449	1249	7698
West Wickham	10197	1869	12066	10068	1909	11977
TOTAL	203672	36917	240589	202954	37296	240250

Appendix 4 (Question 8)

Introduction

This page seeks information about respondents and the capacity in which they are responding to the consultation

1. What is your name? Kevin Grant

2. What is your email address?

kevin.grant@bromley.gov.uk

3. Are you responding as an individual or on behalf of an organisation?

Organisation

4. If you are responding on behalf of an organisation, what is your organisation?

London Borough Bromley

5. Which of the following best describes the capacity in which you are responding to this consultation?

Education

6. Which local authority area are you based in?

Bromley

7. Would you like us to keep your responses confidential?

No

Information provided in response to consultations, including personal information, may be subject to publication or disclosure under the Freedom of Information Act 2000, the Data Protection Act 1998 or the Environmental Information Regulations 2004.

If you want all, or any part, of a response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department for Education will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

Information about home educated children

This section is about current and possible future arrangements for registration of children who are being educated at home

8. How effective are the current voluntary registration schemes run by some local authorities? What would be the advantages and disadvantages of mandatory

registration of children educated at home, with duties on both local authorities and parents in this regard?

Context

At present, 292 pupils are registered as Electively Home Educated (EHE) in Bromley. We know from anecdotal evidence and web based feedback that our Authority is perceived as non-threatening within the community of Electively Home Educating parents, but like other authorities, most (92%) of those children registered as EHE are those who have come to our attention when they stopped attending school. In other words, the number of unregistered children being home educated is not known and cannot be accurately estimated.

The effectiveness of the current arrangements is limited to the services and support provided to families who register their Elective Home Education status with us. We do not know how many children are being Electively Home Educated in Bromley, as they are unregistered and by extension, we cannot quantify their needs or ensure they receive their entitlement to services.

We believe that compulsory registration brings with it the following advantages and disadvantages:

Registration Advantages

- It enables Authorities to identify the children who are EHE and helps to reduce the number of children not receiving their educational entitlement.
- The Authority can send information and advice direct to the families.
- The Authority can offer support when requested (at present, families can only request information about provision only if they are known as being educated at home).
- The Authority can share data with the NHS to notify families of immunisation programmes usually only delivered via schools, and can prioritise any vulnerable children within the limited school nursing resources available.
- Registration allows Children's Social Care to know if the child is educated in school or registered as EHE when they have concerns and helps to meet s 437(1)

Education Act 1996 to intervene & s 436A to enable Authorities to identify children not registered at school or receiving suitable education.

Registration Disadvantages – Current and Future Systems

- Information can become obsolete– there is no current requirement for families to notify the Authority if the child moves home within or outside the area or between parents/carers etc.
- Administrative burden on the Authority will increase; therefore this will need to be resourced.
- There is a risk that some families may move further 'under the radar' to avoid what they perceive as a threat to their freedom to Home educate without external interference.

9. What information is needed for registration purposes, and what information is actually gathered by local authorities? Would it help the efficacy of these schemes, and the sharing of information between authorities, if there were a nationally agreed dataset or if data could be shared by national agencies, such as DWP or the NHS?

The Authority current collects the following information: Name, DOB, address related information, parents/carer names, parents/carer phone numbers, previous school, reason given for EHE, CSC involvement and SEND/EHCP status.

In the future, our preferred information would be the same, but an agreed inter-Authority minimum would be beneficial.

10. Does experience of flexi-schooling and similar arrangements suggest that it would be better if the scope of registration schemes included any children who do not attend a state-funded or registered independent school full-time? If so, do you think that local authorities should be able to confirm with both state-funded and independent schools whether a named child is attending that school full-time?

Flexi-schooling reduces clarity in the context of EHE. Children are either on roll at a school or not (EHE). Flexi-schooling confuses these issues and introduces the possibility of questions relating to responsibility for outcomes, safeguarding, etc. between education providers. Independent schools – the Authority believes that where children are attending independent schools whether in full time or part time provision the school has responsibility for the outcomes whilst parent still has a duty to ensure the child has suitable education – neither would be considered EHE.

Recording of children on a school roll but on reduced hours should be undertaken by the LA but responsibility for outcomes would rest with the school.

Further education colleges that provide courses for pre-16 children may be part-time or less frequently full-time. If the parent has opted to supplement their delivery of education at home/otherwise with a college placement paid for by DfE via the college – these should be considered EHE with an ‘outsourced’ provision.

If flexi schooling is going to be actively encouraged by the DfE then it would be helpful to have clearer guidance, which should consider:

- Safeguarding the child as of paramount importance; should schools be accountable for outcomes given that they are not responsible for a proportion of the teaching?
- The appropriateness of the education proposed by the parent away from the school.
- Clarity around pupil funding.
- The effect on school resources.
- The effect on school discipline and the morale and motivation of other children on roll at the school, where adhoc attendance may lead to disruptive behaviour.
- Strategies and guidance to be set in place for class teachers who will be required to differentiate and make time for a pupil who will be away from class regularly/intermittently.
- Clear agreement between the parent and school with regard to the times the Child or young person will be in school
- Schools should have a reporting mechanism for registration that does not penalise them for the attendance of these CYP.

11. Would the sanction of issuing a school attendance order for parental non-compliance with registration be effective, or is there another sanction which would be more useful?

The application of using a SAO for parental non-compliance appears suitable. However, the prime issue here relates to children who are not recorded with local authorities as they have never attended school. It may be considered whether a financial penalty related to family income levels could be a further sanction in exceptional cases, possible for those taken before a court.

12. What steps might help reduce the incidence of schools reportedly pressuring parents to remove children to educate them at home?

It should be recommended practice that a child or young person who leaves a school to be Electively Home Educated should remain on the school roll until a LA officer has visited the home and confirmed that the parent is able and/or willing to home educate their child or young person. A school should be required to provide an evidence trail to show that every effort was made to engage with the parent/child. Parents intending to EHE should develop an initial plan on how they intend to deliver suitable education, which should be attached to the letter of intent.

Where a school fails in these instances, the school should be required to return a proportion of funding for the whole of the academic year and this sum should be passed to the LA and ring-fenced for the support of genuine and capable home educators.

The outcome data of any child being EHE in years 10/11 should be kept by the school and reflected in their overall results.

Where Elective Home Education is inappropriately promoted as an option to a parent by a school, the school must be required to re-admit the child/young person immediately and without further disruption to the education of that child/young person. Identified instances should be recorded by the Authority and reported to Ofsted and the Schools Adjudicator in the LA annual report.

13. Is there an argument for some provision which allows a child to return to the same school within a specified interval if suitable home education does not prove possible?

Yes, this should be a requirement in the revised guidance. This will further encourage schools towards responsible action around EHE

Monitoring educational provision made at home or for home-educated children

The questions in this section are about ways in which oversight of children who are being home educated would be best arranged so that it helps to ensure the education provided is suitable, but also so that the oversight is proportionate to need.

14. How effective is local authority monitoring of provision made for children educated at home? Which current approaches by local authorities represent best practice?

The Authority systematically reviews Elective Home Education provision via contact with parents on a regular basis, offering 1-2-1 meetings at their home address (around 85% of family groups in Bromley currently accept the home visit route) or elsewhere by an EHE Officer, as well as the option to produce information by other means such as written summaries.

A request for information for an education plan is made as soon as the child is deregistered from school.

Where the child has an Education Health and Care Plan, the EHE Officer calls a review of the Plan when EHE decision is made by parent.

The best approach is for Authorities to view Elective Home Education support as intrinsically linked to Early Help and to have EHE support staff involvement. An opportunity to be able to speak with the child is essential as any assessment made without seeing the child is dubious.

15. If monitoring of suitability is not always effective, what changes should be made in the powers and duties of local authorities in this regard, and how could they best ensure that monitoring of suitability is proportionate?

A framework of expectations that demonstrate suitability of education is needed so that all Authorities are working to the same criteria. It is challenging to measure suitability and outcomes when there are no benchmarking requirements or assessment of progress, leaving excessive flexibility between Local Authorities and individual staff.

Lord Soley's Bill makes a common sense suggestion:

'The expectation that Elective Home Education must include provision of supervised instruction in reading, writing and numeracy, which takes into account the child's age, ability, aptitude and any special educational needs and disabilities'.

It would be useful for Ofsted and the DFE to set out a best practice guide, defining how suitable Elective Home Education should be measured. It is recognised that many home educators may introduce unconventional ways for their children to learn naturally, this is understood and welcome, but there must be evidence made available of learning or it is impossible to distinguish this with families in chaotic situations who are unable to provide evidence of learning.

16. Should there be specific duties on parents to comply with local authorities carrying out monitoring if such LA powers and duties were created, and what sanctions should attach to non-compliance?

Monitoring should be a statutory duty of Authorities and parents should be legally required to cooperate. Without a duty on parents to notify the Authority of their child's education provision and to comply with demonstrating the suitability of current systems means that parents can avoid being monitored and avoid having to provide suitable education. All Authorities need to be clear and unambiguous about this in order to establish clear expectations and common quality standards.

Home educators should be prepared to show examples of their children's learning and enable those with a duty to monitor, to see the child engaged in learning. Where parents refuse to allow officers into the home environment and prefer a neutral location like a local library to be the meeting point, monitoring officers must be given the opportunity to discuss the education provision with the child. Where children and/or families put barriers in the way of officers seeking to identify education, then the School Attendance Order should be progressed without delay and only ceased if a visit is forthcoming and confirmation of suitable education is established.

If families refuse to allow access to the child or fail to meet with the LA at reasonable prearranged appointments (in or out of the home) the child should be registered as a Child Missing Education and a School Attendance Order to be initiated. All schools & academies must be legally required to cooperate with that order. A school/academy should be named through the In Year Fair Access Process, to avoid schools with places receiving a disproportionate number of children/young people who have been out of education for some time. Unless the parent's preferred school is willing to admit the child/young person, the original school should be required to readmit that child/young person back onto their school role.

17. Is it necessary to see the child and/or the education setting (whether that is the home or some other place), in order to assess fully the suitability of education, and if so, what level of interaction or observation is required to make this useful in assessing suitability?

Yes, the majority of EHE families in Bromley agree to visits in their own homes; they are keen to show how well the child is doing. Visits do not need to be in the home and could be at a community facility or the LA office.

Home visits contribute to an effective assessment of whether a suitable education is being provided. Without the evidence of a home visit, it is possible for evidence of a suitable education to be provided to the authority through downloaded written plans or 'evidence' that bear no relation to the reality of what is being offered/delivered to the child. The current situation is that home visits provide safeguarding assurance to the Local Authority as the Authority has no powers to inspect the effect of the education on a child. The association of Authority visits with safeguarding interventions may act as a deterrent for some parents.

18. What can be done to better ensure that the child's own views on being educated at home, and on the suitability of the education provided, are known to the local authority?

One of the greatest challenges with Electively Home Educated children is that they have considerably less natural contact with professionals with whom they can share their views and feelings to, compared to their peers. It is possible to commission independent advocates just as these are commissioned for vulnerable children but such a resource that by necessity needs to be borne centrally. Web based feedback can also be used at an individual level. All attempts to see a child who is perceived to be vulnerable by themselves should be made. In Bromley we have begun a project on developing student voice amongst those children who are Electively Home Educated as well as making sure that they have representatives on the Youth Council alongside representatives from local schools.

19. What are the advantages and disadvantages of using settings which are not registered independent or state schools, to supplement home education? How can authorities reliably obtain information on the education provided to individual children whose education 'otherwise than at school' includes attendance at such settings as well as, or instead of, education at home?

The Authority operates with great caution around the use of unregistered providers because of the lack of regulation and accountability required. This creates issues significant of the variability of quality of provision and safeguarding standards in the learning provision. Once a parent has elected to educate at home, the onus should remain on the parent to provide evidence for that the education provided by supplementary sources is suitable.

20. What are the advantages and disadvantages of using private tutors to supplement home education? How can authorities best obtain information on the education provided to individual children whose education at home includes private tuition, or whom attend tuition away from home?

Many parents pay for private tutoring to supplement their child's learning at school. In these circumstances our expectation is that the private tutoring enhances what is already provided (and measured for quality).

In an Elective Home Education situation where private tuition is provided, neither provider is registered or regulated. It is difficult to be confident in all cases that one is not used to replace or compensate for the other. Quality assessment of unregistered, non-specific 'tutors' or other non-school part time settings is not the LA's responsibility and would also not be practical – it is the parent's responsibility to assess appropriateness. The DfE could take steps to regulate private tutoring or offer guidelines. A national register of local private tutors registered with the LA or an external body.

21. Are there other matters which stakeholders would wish to see taken into account in this area? If so please insert comments below.

- DBS clearance of home tutors should be regularly reviewed.
- Qualifications for teaching CORE subjects centrally recorded.
- A process to prevent school attending families from declaring EHE to take term time holidays.

Support for Home-Educating families

The questions in this section are about ways in which families who educate children at home could be best supported to do so.

22. What might be done to improve access to public examinations for children educated at home?

- All Authority schools should be required to offer to accept private examination entries with in an agreed limit of a percentage of their number on roll at KS4. These should not be counted on the schools results.
- The DfE could provide guidance on reasonable maximum costs to take into account administration, invigilators, SEN, and profit so that parents pay equitable and affordable costs.
- Parents would be required to buy an examination place and pay in advance.

A list of examination centres and exam boards/subjects covered should be published by all Authorities which could be expanded if all future funding agreements for schools required them to host external EHE candidates.

23. What good practice is there currently in local authority arrangements for supporting home-educating families? Should there be a duty on local authorities to provide advice and support and if so how should such a duty be framed?

The LA could provide support such as guidance visits, website with guidance on EHE responsibilities, links to the EHE community and signposts to other LA support. LA's will have to provide resources to register, monitor and to improve education at home where it is inadequate or to enforce an SAO.

Parents who EHE have taken full responsibility for their child's education so they cannot expect the same level of support as provided for children at school. Some LA's do pay for public examinations if known for one year to the LA.

Currently the Authority provides the following:

- Registers all EHE young people (where known) on a database.
- Provides an introductory letter and information pack with the offer of multiple visits where appropriate, together with a written report that is shared with parents.
- Undertakes an initial visit to explain what is available to parents and what they are accountable for (some families enter into Elective Home Education without fully understanding what is required) and provide sign posting to other services.
- Website advice for parents together with bespoke telephone or email advice and guidance service for schools and parents.
- Maintains good links with EHE parent groups responding to local need.

- A forum for student voice is being developed as is representation on the Youth Council.

Other matters

This section asks questions about some specific issues connected with home education. It also allows for general comments to be made on current arrangements for home education, and possible changes.

24. Should there be a financial consequence for schools if a parent withdraws a child from the school roll to educate at home?

Yes - EHE is a legal option to school attendance so the resulting financial savings should be directed to LA's to assist those families where requested.

However, where a school is proven to be persuading parents to remove the child from the register, the child is already likely to be costing the school in some way, perhaps not directly financial. Therefore, a financial penalty may be viewed as a small price to pay compared to the existing problem, or even seen as a solution to end an ongoing drain on staff resource. Then again, some schools or districts have higher numbers of children who are more likely to be removed for EHE for religious or cultural reasons such as GRT or religious groups. These schools could be unfairly impacted financially compared to schools in other areas.

25. Should there be any changes to the provision in Regulation 8(2) of the Education (Pupil Registration) (England) Regulations 2006 requiring local authority consent to the removal of a child's name from the roll of a maintained special school if placed there under arrangements made by the local authority?

It is important that LAs retain the right to consent to the removal of a child from a special school role for the following reasons:

- Where a child/young person with SEND is made an EHC Plan, the Local Authority remains legally responsible for ensuring that the provision in that EHC plan is made, until such time as the EHC Plan is no-longer maintained, which is when the child/young person no longer requires special educational provision commensurate with an EHC plan.
- LA's retain a duty to safeguard children and young people, especially those who are vulnerable. As such, it is for the LA to determine if the family is able to make the special educational provision detailed in an EHC Plan. Parents, though well-intentioned, may underestimate the expertise needed to meet the educational entitlement of a child/young person with SEND. It is a LA's duty to determine suitable education arrangements for a child/young person with an EHC Plan, not a parents
- Where cases progress to the First Tier Tribunal and the child/young person has been removed from the role of a special school, the LA's position may be prejudiced if it

cannot demonstrate that it can make suitable education, including the provision of a suitable education placement. When removing a child/young person from roll, there is inevitably another child/young person waiting to take-up that place. Parents may 'game' the system and may, after removing a child from roll which becomes filled by another child, later argue that because the LA cannot make a suitable state-funded education placement, it must then make provision and placement in the independent / non- maintained sector, at substantially higher costs.

- Where s.444 of the Education Act 1996 is cited, this may well be, but for LAs having to rely on prosecuting parents for an offence further reduces the trust and damages the potential for an alongside and collaborative relationship between the LA and the family.

There is a case for extending this to all children who have an EHCP.

26. Are there any other comments you wish to make relating to the effectiveness of current arrangements for elective home education and potential changes?

Current arrangements are inevitably ineffective either to ensure education or around safeguarding as long as LA's do not know which children within its boundary are being home educated.

Many EHE lobby groups are well intentioned and largely educate their children well. These groups however, DO NOT represent vulnerable parents/families/children whose motives to EHE may be anything but educational. The most vulnerable are unable to articulate their concerns even if they wished to do so. It is these children who we should prioritise and be concerned about. The current 'light touch'/lack of clarity may suit some EHE parents but not the most vulnerable in our society.

27. What data are currently available on the numbers of children being educated at home in your local authority area?

When a child is leaving a school to be EHE, or become aware of one, they are added to our recording database. Parents must write to school and schools must inform LA. Generally this system works well.

However, as families do not have to register if child has never attended school then there will be 'many' unknown EHE families and it is impossible to suggest a number or percentage re this total. Also, if these families move then we may not know. There needs to be a duty on EHE parents to inform the LA of a change of address. If they move out of county then LA has duty to inform next LA or report as CME.

Currently (June 2018) Bromley has around 290 recorded EHE children, plus an unknown number we are not aware of.

28. Do you have any comments on any of the contents of the call for evidence document in relation to equality issues?

Guidance around GRT needs aligning and is at present contradictory. Some areas of local authorities have more EHE than other, which may relate to religious, ethnicity or other issues. EHE families often claim they remove their child due to inadequate SEN support at school or because relationships between schools and families has broken.

Overall this call for evidence is welcomed particularly in light of potential vulnerability of some children in this cohort. Parent's right to EHE is enshrined in law but appropriate safeguards must be in place to care for all children equally as a necessary balance to this right.

Draft revised DfE guidance on home education: for local authorities

This section invites comments on different sections of the draft revised guidance document about the current framework for home education, which DfE proposes to publish for local authority use. Copies of the draft document can be downloaded from the Overview page.

29. Comments on Section 1: What is elective home education?

This needs clarity on EHE & Flexi-schooling. Flexi schooling is an agreement between parents and schools and therefore not an LA responsibility. Either a child is EHE or they are not.

Clarity around EHE attending college 14-16 courses would be welcomed - i.e. colleges must submit names to the local LA.

30. Comments on Section 2: Reasons for elective home education - why do parents choose to provide it?

Parents are not currently obliged to provide a reason and even if they do it may not be the 'real reason'. Those wanting to avoid a penalty fine for taking a holiday, parents who have fallen out with staff /other pupil's parents or may abuse their child are unlikely to give this as the reason.

The best way to determine why will be an in depth conversation with parents and child although are the reasons as important as the provision? A 20 day cooling off period would be good to explore.

Families who suddenly remove their yr10 or 11 child to EHE for ideological views are hard to accept without exploring matters further. This would also help to identify situations where schools have pushed pupils out.

31. Comments on Section 3: The starting point for local authorities

Including a statement which advises that the LA does not currently have any specific duties or powers relating to home education per se, is very disappointing and serves to add weight to arguments made by families not wishing to engage. The LA has a duty to ensure children are in receipt of education and this is impossible unless families engage.

32. Comments on Section 4: How do local authorities know that a child is being educated at home?

1. Schools have duty to inform the LA.
2. Other professionals alerting the LA - confirmed and cross referenced with school.
3. Sometimes Housing Associations, GP practices, police and hospitals ask newly registered patients about 'what school'? If EHE claimed, they might advise LA but not certain.
4. Disgruntled or estranged parent or grandparent may advise the LA.
5. As mentioned in Q8 many parents volunteer to inform the LA and these are added to the data base.
6. Other LA's inform us when a pupil moves into the area however this is inconsistent as many parents do not inform the LA of a change of address.

33. Comments on Section 5: Local authorities' responsibilities for children who are, or appear to be, educated at home

How to determine if EHE is suitable with no effective definition in place and with no 'right' to visit the home this is difficult to enact s436A of Education Act 1996. Parents can too easily prevent LA staff seeing the child and their education on a routine basis. This needs to be reviewed and changed and be replaced by a more appropriate alternative.

Local authorities have no statutory duties in relation to monitoring the quality of home education. LA's cannot be aware of poor or limited education provision if they cannot visit the child at home making s437(1) is almost worthless.

As stated 'Parents are under no duty to respond to such enquiries, but it would be sensible for them to do so'. LBB would like this strengthened to include a duty to respond in an appropriate manner and time frame.

34. Comments on Section 6: What should local authorities do when it is not clear that home education is suitable?

1. Suitable needs defining as each LA has a differing view.
2. Swifter use of School Attendance Orders.

The draft guidance does give much needed clarity around SAO's.

We would suggest that every LA has an appointed EHE officer with QTS or equivalent qualification to enable final judgement on a case where the LA decision regarding the suitability of education is challenged by a parent.

It is considered that without legislation around registration and a requirement on the LA to visit and make a judgement based on the suitability of an education then it cannot ensure children satisfy their right to education. Also, evidence of progress should be clarified during a visit; this should not be reliant on paperwork but direct observation/looking at work completed by the child in question. Access to the child is very helpful in identifying if they are in receipt of appropriate education...seeing the child/young person is not necessarily about safeguarding, but does provide an opportunity for an adult to meet the child and thereby be in a position to raise concerns with other agencies if it appears they may be ill-treated.

35. Comments on Section 7: Safeguarding: the interface with home education

LAs have general duties to safeguard but have no right to see the child if home educated.... This seems a contradiction. Yet s53 Children Act 2004 says that if reasonably practical to take account of children's wishes, but if you cannot even see the child if home educated, how can this take place?

36. Comments on Section 8: Home-educated children with special educational needs (SEN)

8.1. Parental right to home educate...but for a child with an EHC Plan only in so far as it has been established that the parent can make and/or arrange the special educational provision in the EHC Plan.

8.3. Where a parent has elected to Home Educate their child, the likelihood of the Local Authority being able to identify that they have SEN is severely hampered and most usually only comes to light if the parent request EHC assessment

8.4. The local authority would only deem Elective Home Education suitable if the parent can make the special educational provision set out in an EHC Plan. The concern here is where parents wish to make Elective Home Education arrangements but is unable to make the special educational provision in the EHC Plan. Where parents are given the absolute right to have that arrangement regardless of their capacity to make the said provision, and Local Authorities were compelled to financially support parents in ensuring the provision, that the DSG would be destabilised to such an extent that the Local Authority could not make suitable education arrangements for all of the children and young people it is responsible for.

8.5. These instances are most common and suitable where the child or young person has complex and co-morbid education, health and care needs at a severe level or life-limiting conditions. These arrangements are often more or most effectively made through a Personal Budget arrangement. Hampshire County Council is clear about the distinction made in the paragraph, and has a number of examples where this arrangement is made appropriately.

8.6. Local authorities must retain the element of consent. Parents, though well-intentioned, may underestimate the expertise needed to meet the educational entitlement of a child/young person with SEND and local authorities must not be forced into a position of having to agree to the type of Home Education arrangements described in 8.5 where it agrees and arranges special education in the home, because of a parents' desire, regardless of their capacity, to have a home education arrangement. It is a local authority's duty to determine suitable education arrangements for a child/young person with an EHC Plan, not parents.

8.7. It is wholly insufficient to compel a Local Authority to meet its statutory duties including in safeguarding a child's well-being and entitlement to education – for some of the most vulnerable children and young people – through an arrangement where parents are merely “encouraged to see a process of engagement with the child as part of the authority's overall approach to home education of pupil with SEN...”. We disagree strongly with the statement “Local authorities should not assume that because the provision being made by parents is different from that which was being made or would have been made in school that the provision is necessarily unsuitable.” Special Educational Provision in section F of an EHC Plan is determined by an evidence-based and statutory investigation into a child or young person's special educational needs. This is appealable in the First Tier Tribunal, SEND. There cannot be a system where schools and qualified teachers and SENCOs – experts in educating children and young people – are compelled to make the special educational provision set out in an EHC Plan potentially under the order of a court, but that a parent with no educational qualification or expertise is permitted to essentially do-as-they-please. It remains a crucial determinant to Local Authorities that a parent's capacity and ability to ensure the delivery of special educational provision in an EHC Plan absolves it of its statutory duty to otherwise make the arrangements.

8.8. We disagree with the premise put forward in this paragraph, e.g. that “...a parents' commitment to Home Education (or other circumstances) makes it inappropriate for their child to attend school” then compels a Local Authority to agree to Home Education, whether that it is viewed as ‘Elective’ Home Education or where the Local Authority itself arranges it. Regardless of a parents belief in the notion of Home Education, the Local Authority retains responsibility to secure suitable education including special educational provision in-line with an EHC Plan, be that through Elective Home Education (unless the parent has demonstrated their arrangements to be suitable, in which case the LA is relieved of its duties), arranged Home Education or by attendance at an education institution. If, through investigation, it becomes apparent that the parent does not have the capacity or ability to make suitable education arrangements the local authority retains the responsibility. Furthermore, agreeing to Home Education arrangements cannot be on the basis that this causes an inefficient use of the public purse. The principles of section 19 of the Education Act 1996 come into play in determining the suitability of arranged Home Education arrangements, e.g. a defensible position being that these arrangements should not cost any more than they would were the local authority to arrange education in an institution. In reality, the default position for the majority of Local Authorities is that education will be offered and made through an offer of a suitable school placement, but it will, wherever possible and suitable, support families who wish to Home Educate their children. In some circumstances and in the most contentious cases where the Local Authority had a compelling view that the parents' preferred education arrangements are wholly unsuitable, through an education attendance order, but seeking such an order invariably raises further distrust from families towards LAs.

This paragraph (8.8) is in our view confusing and open to interpretation and could potentially conflict with the already published Guidance on Personal Budgets. The suggestion that a parent who has chosen to Electively Home Educate their child who has SEN can ask for funds from the High Needs Block for additional provision related to special educational needs potentially opens the flood gates and will lead to further conflict between parents and the LA.

It will be very difficult to quantify what is different and specifically related to SEN and there is potentially no redress for the LA to turn down requests. The majority of money from the High Needs Block is allocated to schools and commissioned services; however, where a choice has been made not to take up a school place and this has effectively been agreed, a suggestion that funding could be disaggregated on an individual basis and effectively condoned via national guidance is simply not sustainable.

37. Comments on Section 9: What do the s.7 requirements mean?

Requirements are sound for parents to ensure education but how can s7 be assessed if the LA cannot meet with the family?

Section on 'Suitability' is generally helpful. However, It would be helpful for DfE to specify minimum requirements as to effectiveness in such matters as literacy and numeracy. It is a concern that, where parents decline to engage or receive a visit from the LA and are asked to give evidence of the education of their child/young person, they may provide written templates outlining the ethos of the education they are providing; which may not be an accurate account of what is actually being delivered to the child/young person. There is clear evidence that these are often downloaded from the internet in a generic form with spaces to 'insert child's name here' and are not bespoke to the individual learner nor ever intended to be applied.

38. Comments on Section 10: Further information

Children's rights and views are rarely heard as, if they are unhappy there is little they can do to express their views without going through their parents. The LA staff is unlikely to develop deep and meaningful relationships through one or two visits a year, so this area is contentious.

It is noted that free DBS checks for parents are advocated - given that DBS checks are not 'free' and LA's are struggling in terms of finance this needs more thought and financing. In addition, a reasonable question might be why it would be considered appropriate for a 'Child In Need' or a child under a 'Child Protection Order', to be Home Educated, when this places the child/young person 24/7 in the care of the family, that is already raising concerns in relation to their ability to care for the child.

Draft revised DfE guidance on home education: for parents

This section invites comments on different sections of the draft revised guidance document about the current framework for home education, which DfE proposes to publish for parents. Copies of the draft document can be downloaded from the Overview page.

39. Comments on Section 1: What is elective home education (EHE)?

1.3 If a child is EHE they are not registered at a school. By discussing flexi schooling this confuses matters.

40. Comments on Section 2: What is the legal position of parents who wish to home educate children?

This sets out the position clearly.

More 'definite' requirement on hours given to EHE although it might be helpful to suggest expectation that a minimum average of 3 to 5 hours per day.

2.11 clearly tells parents what they do not need to do but a similar table listing what is expected would be helpful as the existing text may give the impression to some parents that they need actually do very little.

2.13 - open to huge abuse...who might a child express their views to?

An emphasise that the parent has a legal duty to 'actually' educate their child if they opt to Home Educate and failure to do so would have legal consequences. It should leave the parent vulnerable to legal challenge in future years if the Child/young person considers they were denied an education during this time to which they are legally entitled.

41. Comments on Section 3: So what do I need to think about before deciding to educate my child at home?

3.2 Reasons are sound but would change 'distance to school' to preferred school place not available.

'Religious or cultural' has too much cross over with 'ideology or philosophy' - it would be hard to distinguish in practice. Suggest this list is given more thought as this would make a good basis for all LA's recording reasons and informing DFE of reasons for EHE.

3.7 - Some families chose EHE to have extended holidays, thus avoiding any Penalty Notices or other legal action. There needs to be comment that this is unacceptable and something in place to act as a deterrent.

42. Comments on Section 4: If I choose to educate my child at home, what must I do before I start?

4.2 - This is contrary to advice given, parents should inform school that they wish to EHE and school to take off roll/inform LA. By stating 'not obliged to inform school' this will make considerable extra work for schools/LA trying to find out where the child is. Some parents remove their child from school overnight without any chance to say goodbye – this may be damaging to the child.

4.3 - Any element of SEN needs to be explored whether special school or not.

4.5 - Some parents are very reluctant to admit EHE has not been a success; sadly many children miss out on a rounded education as a consequence. This may be because the parent is unable to put their child at the centre of the process. Some children are Home Educated to meet parental need, not child need. E.g. young single carers, or parents with their own mental health issues.

43. Comments on Section 5: What are the responsibilities of your local authority?

Safeguarding should include the right to speak with the child for their views.

5.7 - excellent

5.19 - Should it not come first in this section?

The minimum requirement of education to be stated should include reading, writing and numeracy. This would provide foundation guidance from which the parent can work when delivering the education they choose and the authority can have a base position when monitoring that a suitable education is taking place.

The guidance for parents provides a clear framework which better defines the roles and responsibility of both the parent and LA. It does not however refer to those children and young people who are known to be Home Educated and yet are under Child Protection Orders, these children should return to school until the LA are confident that the child/young person is no longer at risk and CP order can be lifted.

44. Comments on Section 6: Further information

Given the financial constraints on LA's checks must be paid from somewhere and if parents are taking responsibility then they should be asked for a contribution.

6.3 - Confuses the issue around flexi schooling. Please remove.

Draft guidance documents: equality issues

45. Do you think that anything in the revised guidance documents could have a disproportionate impact, positive or negative, on those with 'relevant protected characteristics' (including disability, gender, race and religion or belief) - and if so, how?

A minority of parents may use the legal status of EHE to mislead LA's and avoid educating their child. Children/young people who are carers or who are under child protection orders and those who are GRT and not in receipt of an education can be disadvantaged by being removed from the education system under the guise of EHE. A disproportion is in Year 10 and 11, and experience indicates this group are more likely to become NEET after compulsory education ends.

END