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DATE: 13 September 2021

To: Members of the

## **GENERAL PURPOSES AND LICENSING COMMITTEE**

Councillor Pauline Tunnicliffe (Chairman)

Councillor Michael Turner (Vice-Chairman)

Councillors Gareth Allatt, Nicholas Bennett MA J.P., Mark Brock, Robert Evans, Kira Gabbert, Colin Hitchins, Josh King, Alexa Michael, Neil Reddin FCCA, Melanie Stevens, Harry Stranger, Ryan Thomson and Stephen Wells

A meeting of the General Purposes and Licensing Committee will be held at Bromley Civic Centre on **TUESDAY 21 SEPTEMBER 2021 AT 7.00 PM**

**PLEASE NOTE:** This meeting will be held in the Council Chamber at the Civic Centre, Stockwell Close, Bromley, BR1 3UH. Members of the public can attend the meeting: you can ask questions submitted in advance (see item 3 on the agenda) or just observe the meeting. There will be limited space for members of the public to attend the meeting – if you wish to attend please contact us, before the day of the meeting if possible, using our web-form:

<https://www.bromley.gov.uk/CouncilMeetingNoticeOfAttendanceForm>

Please be prepared to follow the identified social distancing guidance at the meeting, including wearing a face covering.

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Chief Executive

***Copies of the documents referred to below can be obtained from***

***<http://cds.bromley.gov.uk/>***

### **A G E N D A**

- 1 APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTE MEMBERS**
- 2 DECLARATIONS OF INTEREST**
- 3 QUESTIONS**

In accordance with the Council's Constitution, questions that are not specific to reports on the agenda must have been received in writing 10 working days before the date of the meeting - by 5pm on 7 September 2021

Questions specifically on reports on the agenda should be received within two working days of the normal publication date of the agenda. Please ensure that questions specifically on reports on the agenda are received by the Democratic Services Team by 5pm on Wednesday 15 September 2021.

- 4 **CONFIRMATION OF MINUTES OF THE MEETING HELD ON 6 JULY 2021**  
(Pages 3 - 6)
- 5 **FEEDBACK ON THE 2021 POLLS AND UPDATE ON ELECTORAL ARRANGEMENTS** (Pages 7 - 30)
- 6 **ANNUAL COMPLAINTS REPORT AND LOCAL GOVERNMENT AND SOCIAL CARE OMBUDSMAN LETTER 2020/21** (Pages 31 - 80)
- 7 **LICENSING ACT 2003 - AMENDMENT TO THE STATEMENT OF LICENSING POLICY FOR 2021 TO 2026 - CUMULATIVE IMPACT ASSESSMENT** (Pages 81 - 130)
- 8 **TRANSFORMING BROMLEY 2019 - 23: FIRST TWO YEARS** (Pages 131 - 152)
- 9 **REVIEW OF THE SCHEME OF DELEGATION TO OFFICERS** (Pages 153 - 156)
- 10 **WORK PROGRAMME AND MATTERS ARISING** (Pages 157 - 162)
- 11 **AUDIT SUB-COMMITTEE: MINUTES OF THE MEETING HELD ON 8 JUNE 2021, EXCLUDING EXEMPT INFORMATION** (Pages 163 - 172)
- 12 **LOCAL GOVERNMENT ACT 1972 AS AMENDED BY THE LOCAL GOVERNMENT (ACCESS TO INFORMATION) (VARIATION) ORDER 2006 AND THE FREEDOM OF INFORMATION ACT 2000**

The Chairman to move that the Press and public be excluded during consideration of the items of business listed below as it is likely in view of the nature of the business to be transacted or the nature of the proceedings that if members of the Press and public were present there would be disclosure to them of exempt information.

	<u>Items of Business</u>	<u>Schedule 12A Description</u>
13	<b>AUDIT SUB-COMMITTEE: EXEMPT MINUTES - 8 JUNE 2021</b> (Pages 173 - 178)	Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

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## GENERAL PURPOSES AND LICENSING COMMITTEE

Minutes of the meeting held at 7.00 pm on 6 July 2021

### Present:

Councillor Pauline Tunnicliffe (Chairman)  
Councillor Michael Turner (Vice-Chairman)  
Councillors Gareth Allatt, Nicholas Bennett MA J.P.,  
Mark Brock, Robert Evans, Kira Gabbert, Colin Hitchins,  
Josh King, Alexa Michael, Neil Reddin FCCA,  
Harry Stranger and Ryan Thomson

### Also Present:

Councillor Angela Wilkins

#### **164 APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTE MEMBERS**

Apologies for absence were received from Cllr Melanie Stevens (however, she did listen to the meeting via phone link.)

#### **165 DECLARATIONS OF INTEREST**

There were no declarations of interest.

#### **166 QUESTIONS**

No questions had been received.

#### **167 CONFIRMATION OF MINUTES OF THE MEETING HELD ON 1 JUNE 2021**

**RESOLVED** that the minutes of the meeting held on 1 June 2021 be confirmed.

#### **168 AUDIT OF THE 2019/20 FINANCIAL STATEMENTS** Report FSD21042

The report set out the current position concerning the external audit of the Council's 2019/20 Statement of Accounts.

Janet Dawson from EY, the Council's independent external auditor, attended the meeting to set out the current position. It had been a laborious process, but work on the 2019/20 accounts was nearing completion, which would allow them to move on to the 2020/21 accounts. Final information about property and equipment valuations had been received from officers, and she hoped to

be able to provide their qualified opinion report in August. She confirmed that they did not expect to find any new issues of concern about property and valuation issues. The Council was required to submit a robust going concern assessment forecasting twelve months ahead of the expected signing date of the accounts, but she anticipated that the Council would be in a strong position given its level of reserves.

Officers confirmed that the Council did not have a single fixed asset register or a register for furniture and equipment - there were various separate registers. EY had commented that Bromley had a small Finance Team – officers confirmed that the Team was lean, but that other factors were being examined to improve the closing process, including consideration of resourcing bottle-necks, better IT processes and opportunities for upskilling staff.

Ms Dawson confirmed that the external auditor had raised for several years the need for Council's banking accounts to be segregated between the Pension Fund and the General Account. It was confirmed by officers that this would be possible with the Oracle system upgrade due to be implemented no later than March 2022.

The Chairman thanked Ms Dawson for attending the meeting.

**RESOLVED that the external auditor's Audit Results Report be noted, including details of:**

- (a) the proposed audit opinion on the financial statements;**
- (b) errors, adjusted and unadjusted audit differences that the audit has highlighted;**
- (c) outstanding matters that require addressing before the audit can be completed; and**
- (d) the position concerning outstanding objections and the impact on external audit work.**

**169          RETURN TO PHYSICAL MEETINGS**  
Report CSD21060

The regulations which permitted virtual committee meetings had expired on 7<sup>th</sup> May 2021, so members considered the future arrangements for meetings until the lockdown restrictions were lifted and beyond. To be formally present at a meeting and to vote Councillors now needed to be physically present – this requirement did not apply to officers and members of the public, although the Council did have to provide facilities for members of the public to attend meetings in person.

Live-streaming or broadcasting meetings could still perform a valuable role in promoting the Council's activities and was a legitimate means of managing

attendance, by allowing those who were content to watch remotely to continue doing so. Officers were investigating the options for updating the existing audio facilities in the Council Chamber to enable hybrid meetings and integrate with live-streaming. This could be achieved at relatively modest initial cost, about £15k, and within existing budgets. There would be wider uses for the equipment for a range of other meetings.

Some members supported equipment being introduced in Committee rooms.

A member commented that it was still desirable in some meetings, such as Plans Sub-Committees, that officers should attend in person to advise members; there were also some concerns about members of the public being filmed in meetings, but the practical issues could be overcome and data protection notices would be updated as necessary. Most Members considered that the proposals should be supported.

**RESOLVED that**

**(1) Measures to enable hybrid meetings, remote attendance by visiting members, officers and members of the public, and live-streaming of meetings, be supported and introduced.**

**(2) The Leader be requested to lobby for a change to the law that will enable remote attendance at meetings by members.**

**170 REVIEW OF THE SCHEME OF DELEGATION TO OFFICERS**  
Report CSD21077

The Scheme of Delegation to officers was reviewed at least once a year - an updated version was usually considered at the annual meeting of the Council. The Scheme had not been thoroughly reviewed for some years; in most years, including 2021, there were few, if any, significant changes made. At the annual Council meeting on 19<sup>th</sup> May 2021 a member complained that a number of provisions in the scheme were incorrect or should be reviewed, and at the Mayor's suggestion, the matter was referred to this Committee to consider. The particular issues raised at the annual Council meeting were addressed in the report.

The Scheme covered in one document both non-executive delegations and executive delegations from the Leader. Council could make changes to the non-executive delegations, but changes to the executive delegations could only be made by the Leader. Bromley's Scheme set out in detail all the specific functions delegated to officers; some councils had adopted much shorter schemes based on setting out what functions were not delegated to officers, but were reserved for member decision. The Director of Corporate Services emphasised that the Scheme allowed for changes in legislation; the Scheme was not undermined by minor errors or references to legislation that had not been updated. He also explained that officers did have authority to take urgent action outside the Scheme when necessary – although this was very rarely required.

Members considered that they should examine the Scheme in more detail – it was proposed that a member working group should be set up to review the Scheme, consult with PDS Committees and report back before the next annual Council meeting.

**RESOLVED that a member working group be set up to review the Scheme of Delegation to Officers.**

**171 WORK PROGRAMME AND MATTERS OUTSTANDING**  
Report CSD21076

The Committee considered its work programme for 2021/22. It was noted that there would be a report in the autumn reviewing the 2021 GLA elections – members were also interested in the changes to ward boundaries and the proposed new parliamentary boundary changes.

Members noted that after the meeting there would be a presentation from Steve Phillips, Heath, Safety and Licensing Manager, on licensing issues.

**RESOLVED that the work programme be noted.**

**172 LOCAL GOVERNMENT ACT 1972 AS AMENDED BY THE LOCAL GOVERNMENT (ACCESS TO INFORMATION) (VARIATION) ORDER 2006 AND THE FREEDOM OF INFORMATION ACT 2000**

**RESOLVED that the Press and public be excluded during consideration of the item of business referred to below as it is likely in view of the nature of the business to be transacted or the nature of the proceedings that if members of the Press and public were present there would be disclosure to them of exempt information.**

**The following summaries  
refer to matters involving exempt information**

**173 EXEMPT MINUTES OF THE MEETING HELD ON 1 JUNE 2021**

**RESOLVED that the exempt minutes of the meeting held on 1 June 2021 be confirmed.**

The Meeting ended at 7.40 pm

Chairman

# Agenda Item 5

Report No.  
CSD21088

London Borough of Bromley

PART ONE - PUBLIC

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**Decision Maker:** GENERAL PURPOSES AND LICENSING COMMITTEE

**Date:** 21 September 2021

**Decision Type:** Non-Urgent Non-Executive Non-Key

**Title:** FEEDBACK ON THE 2021 POLLS and UPDATE ON ELECTORAL ARRANGEMENTS

**Contact Officer:** Carol Ling, Electoral Services Manager  
Tel: 020 8313 4367 E-mail: carol.ling@bromley.gov.uk

**Chief Officer:** Peter Turner, Director of Finance

**Ward:** Borough Wide

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1. Reason for report

To advise Members on the key issues relating to the Greater London Authority (GLA) Elections and the Crystal Palace By Election held on Thursday 6 May 2021, and to highlight the forthcoming changes in electoral arrangements.

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2. **RECOMMENDATION(S)**

**Members note the contents of the report and consider if there is any feedback the want to give the Returning Officer for him to take into account when planning for future elections.**

### Impact on Vulnerable Adults and Children

1. Summary of Impact: Not Applicable
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### Corporate Policy

1. Policy Status: Not Applicable
  2. BBB Priority: Excellent Council
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### Financial

1. Cost of proposal: Not Applicable
  2. Ongoing costs: Not Applicable
  3. Budget head/performance centre: Conducting Elections
  4. Total current budget for this head: Not Applicable
  5. Source of funding: The GLA funds the GLA Elections, and the Cabinet Office has provided additional funding to directly address costs associated with making the elections Covid-secure
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### Personnel

1. Number of staff (current and additional): 3 full time, 4 casual staff and approximately 1,000 temporary staff recruited by the Returning Officer for staffing polling stations, opening and verifying postal votes and staffing the e-count.
  2. If from existing staff resources, number of staff hours: Not Applicable
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### Legal

1. Legal Requirement: Statutory Requirement: The Council is required to designate one of its officers as Returning Officer for Local Council Elections (includes GLA Elections) under the provisions of section 35 of the Representation of the People Act 1983.
  2. Call-in: Not Applicable:
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### Procurement

1. Summary of Procurement Implications: Not Applicable
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### Customer Impact

1. Estimated number of users/beneficiaries (current and projected): c240,000 registered electors, candidates, agents and staff
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### Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not Applicable
2. Summary of Ward Councillors comments:

### 3. COMMENTARY

#### GLA ELECTIONS

##### BACKGROUND

- 3.1 Elections for the Mayor of London and the twenty-five (25) Members of the London Assembly take place every four years and were due to take place on 7 May 2020. However, as the Coronavirus pandemic worsened, the UK Government announced on 13 March 2020 a 12-month postponement of all May polls until 6 May 2021.
- 3.2 The announcement of the second lockdown in December 2020 created concerns that polls could be postponed again. However, Returning Officers and their electoral teams were advised to continue to prepare for 6 May polls and remained in close contact with the Cabinet Office, the Electoral Commission and the GLA.
- 3.3 Official confirmation of polls being run as planned, came from the UK Government on 5 February 2021 (just weeks before notices of elections were due to be published). The UK Government also announced that additional funding was to be made available to all areas in England holding elections in May to directly address costs associated with making the elections Covid secure.
- 3.4 On Thursday 6 May 2021 the GLA elections were held across London. In Bromley, the poll was also taken with the election of one councillor in the Crystal Palace ward.

##### VOTING SYSTEMS

- 3.5 The GLA Elections are the most complex elections held in the UK with 3 contests electing:
- Mayor of London – under the *supplementary vote system* where voters have two votes - a first and second choice of candidates (pink ballot paper) \*
  - 14 Constituency Members of the London Assembly – under the *first past the post system* where the ballot paper lists names of individual candidates, and voters have one vote by placing a cross next to the candidate of their choice (yellow ballot paper)
  - 11 London Wide Members of the London Assembly – under a proportional basis known as the *modified d’honte system* where the ballot paper lists political parties and independent candidates, and voters vote once (orange ballot paper)

\*The record number of 20 candidates meant that for the first time, the ballot paper was split into two side by side sections

##### ROLES AND RESPONSIBILITIES

- 3.6 The **Greater London Returning Officer (GLRO)** (Mary Harpley, Chief Officer, Head of Paid Service, GLA) is the Returning Officer for the elections of Mayor and London wide Members. She is responsible for the nomination process and counting and declaring the results of the London Mayor and London wide Assembly Member polls, co-ordinating the elections at a London wide level and has the power to issue directions.
- 3.7 The **Constituency Returning Officer (CRO)** (Mark Bowen, Director of Corporate Services, Bromley) is the Returning Officer for the election of the constituency (Bexley and Bromley) London Assembly Member. He is responsible for the conduct and administration of the elections in the constituency (of Bexley and Bromley) including dealing with the nomination process (for the constituency member only), providing the polling stations, appointing poll staff, managing the postal voting process, and providing the staff to count the votes for all three contests, subject to the directions issued by the GLRO. (Following Mr Bowen’s retirement in

August 2021, Ade Adetosoye, Chief Executive, Bromley is the appointed Returning Officer/Electoral Registration Officer)

- 3.8 The **Borough Returning Officer (BRO)** (Jackie Belton, Chief Executive, Bexley). Legislation does not recognise this role but in practical terms the BRO agrees to carry out certain functions within Bexley in support of the CRO.
- 3.9 **The duties of a Returning Officer are separate from their duties as a local government officer and they are personally liable for the conduct of (that part) of the election. While undertaking these duties, the Returning Officer is not accountable to the council, but is independent and answerable only to the courts.**
- 3.10 The GLA Election Rules place a duty on the different Returning Officers to co-operate with each other in the discharge of their duties and sign a Memorandum of Understanding to this effect.
- 3.11 The GLRO issued the CROs with thirteen (13) directions to ensure constituency across London (see Appendix 1). The CRO adhered to all the directions.

### **POLL CARDS**

- 3.12 The format and wording of the poll cards is prescribed by law and the CRO had no discretion to amend or change it.
- 3.13 Shortly after the formal election period began with the publication of the notice of election on Monday 22 March 2021, the CRO was able to secure early despatch of some 246,000 poll cards. These were delivered by Royal Mail to all registered electors in the borough (including polling station voters, postal voters and proxy voters). A further 8,500 cards were despatched up to a week or so before polling day, to those residents who registered close to the relevant deadlines.
- 3.14 This gave residents ample time to update their registration information or to apply for an absent vote before the relevant cut-off date.

### **REGISTERING TO VOTE**

- 3.15 The cut-off date for registering to vote at these elections was Monday 19 April 2021. The date is governed by legislation and, in common with most of the election timetable, the CRO has no discretion to extend the date and deadline.
- 3.16 The Electoral Office received 5,480 registration applications (mostly online) between the start of the election and the registration deadline. Approximately 1,200 of these applications were “duplicate applications” i.e. an application that can be matched to an individual already on the register at the same address. Unfortunately, national publicity does not always make it clear that only individuals **not** on the register, need to register.

### **POLLING STATIONS**

- 3.17 The CRO’s staff initially contacted all polling stations in October 2020 to advise them of the (new) date of the postponed GLA elections. All private premises confirmed their availability with most Head teachers agreeing that their schools would be made available as a polling station on 6 May 2021.
- 3.18 However, a few (6) Head teachers expressed objections to their schools being used as polling stations given the Covid pandemic situation, the loss of education already suffered by pupils, and the risk of members of the public coming on site.

- 3.19 The CRO was sympathetic to their concerns given the Covid pandemic and although he has the right by law to request a room within a school, he instructed his staff to find alternative venues, where possible. Investigations were made, alternative venues identified, and visits arranged in most cases to assess their accessibility/suitability.
- 3.20 However, the situation was compounded on 11 February 2021 when a letter from the Department of Education (DofE) and Cabinet Office Ministers to Head teachers and Returning Officers urged Returning Officers to find other premises where possible. This was further compounded by a DofE email to Head teachers insisting that schools remain open on polling day for vulnerable and keyworkers' children.
- 3.21 These interventions caused widespread confusion so the CRO contacted Bromley Head teachers direct to ascertain any concerns they may have with their school being used as a polling station. As a result, numerous schools became unavailable (after already being confirmed) and this was just weeks before the poll card data was due to be sent to our printers (with details of the polling stations).
- 3.22 The availability of suitable buildings in many areas was already slim, but Electoral staff worked extremely hard to find alternative venues, where possible. Social distancing and home working were also additional barriers to visiting and assessing potential alternative venues. However, by the day poll card data was due to be sent to the printers, alternative venues were secured for 19 schools (see Appendix 2) with only 15 schools being used as polling stations at these elections (see Appendix 3) (in the 2019 General election 34 schools were used as polling stations).
- 3.23 A variety of new premises were used as polling stations as alternatives to school premises including bowling clubs, public houses, restaurants, social clubs, a cinema and golf club. These details were included on the poll cards.
- 3.24 Where there was no suitable alternative venue and given the exceptional circumstances of the Covid pandemic, the CRO agreed to a couple of polling stations being moved from school premises and amalgamated into existing polling stations in adjoining polling districts. These details were highlighted on the poll cards.
- 3.25 The CRO acknowledges that a couple of the alternative venues (including the Vue Cinema and the Gordon Arms) were not ideal and/or suitable and/or accessible and will not be used at future elections. Where the new arrangements worked well, the alternative venues will be considered in the forthcoming Review of Polling Districts, Places and Stations (see paragraph 3.71 below). However, schools are often the only suitable place for polling stations to be sited.

## **RECRUITMENT OF STAFF**

- 3.26 A major issue of this election was ensuring the recruitment of sufficient temporary staff to run polling stations, open and verify postal votes and count the votes. In addition to these usual roles, the CRO was also required to recruit additional staff at the polling stations where Covid marshalling was deemed necessary, and to ensure a pool of staff to cover last minute illness and self-isolation.
- 3.27 Many of the staff on the CRO's election staff data base are older and more vulnerable to Covid - 19 and a high percentage of these regular staff (understandably) declined to work at these elections. Furthermore, some 150 staff who originally accepted appointments subsequently dropped out – many of them due to Covid 19 and self-isolation requirements.
- 3.28 Polling staff were much harder to recruit than at previous elections (especially as it was mandatory for all polling staff to wear face masks throughout the day). However, the CRO was assisted with this recruitment by both the Council (through the Chief Executive and the Covid 19 Response team providing support amongst the Covid volunteers) and the UK Government

(providing support amongst the civil service, national volunteers, furloughed service industry employees).

- 3.29 The health and safety of the staff appointed by the CRO is always paramount, but this is especially so during the Covid pandemic. While risk minimisation measures were in force including the wearing of personal protective equipment (face masks, visors, gloves), hand sanitising, taking lateral flow tests, social distancing and one-way systems, Perspex screens, regular cleaning etc, there was no guarantee that these election events would not become super spreader events!
- 3.30 Specific online training was provided by the GLA for all staff working at polling stations and on the e-count. The CRO supplemented this with written/printed guidance.

## **POSTAL VOTING**

- 3.31 The Cabinet Office, Electoral Commission and the GLA continuously advised the CROs and their teams to expect a significant surge in postal votes due to the Covid pandemic and especially after contact was made with Clinically Extremely Vulnerable people shielding at home, to make them aware of postal/proxy voting options.
- 3.32 Although the CRO contacted about 20,000 Clinically Extremely Vulnerable people in Bromley, there was only a small increase in the postal votes.
- 3.33 About 40,288 postal vote packs were despatched from our printers (via Royal Mail) with the bulk of these going out on Friday 23 April 2021. This included all those electors with permanent postal votes and those who applied up to 22 March 2021. Residents who applied after this date and up to the deadline of Tuesday 20 April 2021 received their postal vote packs a few days later.
- 3.34 Most residents received their postal vote packs the day after they were despatched. There were a small number of cases of non-receipt from about 50 residents but they were all offered (and most accepted) replacement postal vote packs (which are available up to 5pm on polling day).
- 3.35 The personal identifiers (signature and date of birth) on every returned postal vote statement must be checked and verified against those held on file from the original application. This is (in normal times) a huge logistical operation requiring suitable accommodation, IT and staff.
- 3.36 However, in the Covid pandemic situation, this operation became particularly challenging with the usual accommodation (the Great Hall) being unavailable (Covid Vaccination Centre), and other suitable accommodation such as the Council Chamber (Covid Test Centre), Committee Room 1 (Occupational Health team's equipment store) and Committee Rooms 2 & 3 (Registrars) also being unavailable.
- 3.37 The CRO explored alternative accommodation in the Civic Centre including the Ground floor Reception area in North Block and the Rose Room in Stockwell Building but neither of these were suitable.
- 3.38 After an extensive program of work by the Facilities Manager, by early/mid April, the Covid Test Centre was moved to the rear of the Customer Reception, the Occupational Health team's equipment was moved to Bertha James Centre and the Registrars re-located to 1<sup>st</sup> Floor Stockwell Building. This enabled the CRO to use Committee Rooms 1, 2 & 3 for the opening and verifying of the returned postal votes (with the Council Chamber used for the fitting up the ballot boxes and packing of materials needed for the polling stations) .

- 3.39 The Committee Rooms were set up with the IT and laid out in a Covid secure manner allowing for social distancing, one-way systems, Perspex desk screens, hand sanitisers, PPE etc. (to ensure the health and safety of the CRO's staff, candidates and agents).
- 3.40 Four scheduled postal vote opening sessions took place before polling day, with a further/last session on polling day.
- 3.41 As previously mentioned 40,288 postal votes were issued, 30,153 (75%) were returned by close of poll with 1,657 postal votes being rejected for either want of a signature and/or date of birth, or mismatched signature and/or date of birth or ballot paper(s) unreturned or postal vote statement unreturned. In accordance with the law, these voters have been contacted and advised that their postal vote was rejected (and given the reason why it was rejected).
- 3.42 Once the personal identifiers were verified, the postal ballot papers were placed in ballot boxes, which were sealed and securely stored before being transported to the count venue following close of poll on Thursday 6 May 2021 in readiness for the count.

### **PROXY VOTING**

- 3.43 New proxy vote legislation was introduced in February 2021 removing the need for attestation where an application was made on the grounds of Covid 19 to allow those isolating because of testing positive for or being in close contact with a Covid 19 case. The unknown take-up led to resourcing uncertainty on polling day and during the week before.
- 3.44 The total number of proxies appointed for these elections in Bromley was 311 with 7 electors who appointed emergency coronavirus proxies.

### **THE CRO and his CORE ELECTORAL TEAM**

- 3.45 A key challenge for the CRO was keeping his core Electoral team safe and well during the ongoing pandemic. Much of the 6 May polls was arranged during periods of home working but later stages had to be carried out in the office due to processes involved and equipment needed. Social distancing, wearing masks and team 'bubbles' were crucial to reduce the risk of the whole team having to self-isolate at vital stages of the process.
- 3.46 Also, the burden of undertaking numerous Covid risk assessments, safety protocols and calculating PPE needs created significant additional work at various points during the electoral timetable.

### **SUPPLIER ISSUES**

- 3.47 Returning Officers and their electoral teams rely heavily on external printers for poll cards, postal vote packs and ballot papers. There are a relatively small number of specialist printers in the UK who have the facilities, resources and security to fulfil election teams' requirements.
- 3.48 All printers were stretched by the sheer number and variety of election materials required for 6 May polls. Several large printers experienced serious issues with late deliveries. However, the CRO was able to secure early despatch/delivery dates with our printers and no delays occurred.

### **POLLING DAY**

- 3.49 Polling day itself ran remarkably well with no major issues being reported.
- 3.50 Social distancing and combinations of ballot papers and voting systems saw some short queues forming at a few polling stations during the day, which were managed by the polling staff. The legislation introduced after the 2010 General Election successfully ensured anyone in a queue

by 10pm was able to cast their vote. The CRO is not aware of any significant queues occurring in Bromley at the close of poll.

- 3.51 There was an issue at one polling station regarding access (being hindered by tellers) but this was quickly resolved by the CRO and his staff.
- 3.52 Polling finished at 10pm and Presiding Officers returned their sealed ballot boxes, unused ballot papers and other election materials back to the Bromley Civic Centre.
- 3.53 A small team checked the ballot paper accounts (for arithmetical errors) and staff opened and verified the last postal votes (handed into the polling stations and the Civic Centre by 10pm). The sealed ballot boxes were then loaded on to waiting lorries and delivered to the count venue at ExCel in readiness for the e-counting of the votes the next day on Friday 7 May 2021.

## **THE E-COUNT**

- 3.54 Due to the length of time that it would take to count the votes for the Mayor of London and London Assembly, the GLRO took the view that based on speed & accuracy and the fact that e-counting was tried & tested for GLA Elections, e-counting should be used again at these elections. The GLRO procured an e-counting service with CGI.
- 3.55 To protect public health and reduce the risk of the transmission of coronavirus during the count, the GLRO directed that the count would take place over 2 days - Friday 7 May starting at 9am and Saturday 8 May 2021 starting at 8am, with the Mayoral results and London List Assembly Members being announced on Saturday 8 May 2021.
- 3.56 The count was conducted at three regional venues namely Alexandra Palace, Olympia and ExCel, with Bexley and Bromley constituency counting at Excel on Friday 7 May 2021 (together with two other constituencies - Havering and Redbridge, and Lambeth and Southwark).
- 3.57 The venue and e-count equipment were set up and tested by CGI. The layout of each individual constituency was designed to take account of health and safety, social distancing requirements and to maximise the efficiency of the workflow, but also so that candidates, agents and others could easily observe the count processes. The wearing of face coverings was mandatory, and all staff were required to take Covid (lateral flow) tests prior to entering the venue.
- 3.58 The GLRO outlined different roles at the count and provided guidance on the numbers of staff CROs should assign to each role. The main roles are:
- Scanner operator – scans ballot papers
  - Scanner and PC marshals – takes ballot papers to and from scanner and PC stations
  - PC workstation operator – registers batches of ballot papers, verifies batches of ballot papers, adjudicates uncertain ballots and manually enters unscannable ballots
  - Returning Officer team – assists the CRO with the final stage of the adjudication process
  - Support staff – assists with the opening of ballot boxes, the transferring of ballot papers into trays, and packing away the ballot papers at the conclusion of the count
- 3.59 Each constituency appointed their own staff. Working with the BRO, the CRO appointed 101 staff. Staff were allocated specific roles and received training – initially attending a day at a training site (in March 2020 before the Covid pandemic) where there was practical experience on the system, and then online, which all staff were required to complete before attending the count.

- 3.60 The speed of the count depends on the scanning machines being kept working at all times. The count process started at 9am and all scanning machines were up and running in the Bexley and Bromley constituency count within 20 minutes or so. Staff worked very efficiently and effectively over the next 10 hours or so. We were the first constituency to finish counting at ExCel on that day with the results being produced shortly after 7pm.
- 3.61 Turnout in the Bexley and Bromley constituency was 44% with an overall London turnout of 42%. Full details of the results are available at <https://www.londonelects.org.uk/im-voter/election-results/results-2021>
- 3.62 Several reviews are now being undertaken to ensure that lessons learned are captured for future GLA elections.

### **CRYSTAL PALACE BY ELECTION**

- 3.63 Following the resignation of the Crystal Palace ward councillor (Cllr Ahmad) at the beginning of March 2021, valid nomination papers were received from 4 candidates by the deadline, and the poll was combined with the GLA Elections on Thursday 6 May 2021.
- 3.64 Separate poll cards and postal vote packs were issued and the polling stations (already secured for the GLA Elections) in the ward at Sydenham Lawn Tennis Club, St Pauls Anerley Church Hall and Anerley Town Hall & Business Centre were used with additional staff being appointed to cope with the extra ballot paper and separate ballot box.
- 3.65 Legislation provides that the votes at a by election (and any other poll) must be verified and counted at the same time as the GLA elections, so the GLRO set aside space at the regional count venues to enable the separate (manual) count of the votes of the by elections. Adaptations were made to the layouts enabling social distancing to be maintained, and additional measures put in place such as Perspex screens on the desks to ensure the health and safety of staff, candidates and agents.
- 3.66 The count started at 10.30am on Friday 7 May 2021 at Excel and went smoothly and uneventful with the result being declared by the Deputy Returning Officer within a couple of hours. Turnout was 42% and full details of the results are available at [https://www.bromley.gov.uk/info/200033/elections\\_and\\_voting/1224/crystal\\_palace\\_ward\\_by-election\\_2021](https://www.bromley.gov.uk/info/200033/elections_and_voting/1224/crystal_palace_ward_by-election_2021)

### **NEW ELECTORAL ARRANGEMENTS**

#### **WARD ARRANGEMENTS**

- 3.67 The Local Government Boundary Commission recently completed a review of Bromley Council and the Bromley (Electoral Changes) Order 2021 was made on 1 April 2021. The new **ward arrangements** come into force at the next local elections to be held on 5 May 2022.
- 3.68 The *boundaries* of all existing wards and the *names* of many will change (see Appendix 4). Individual (A4 size) ward maps showing the new boundaries are now available from the Electoral Office. Full details are available at [www.lgbce.org.uk/current-reviews/greater-london/bromley](http://www.lgbce.org.uk/current-reviews/greater-london/bromley)
- 3.69 The Returning Officer has no authority to make any changes to the new ward boundaries and/or names.
- 3.70 As a result of the alterations to the ward boundaries, many of the polling districts, polling places and polling stations will now require amending/changing. A full review of the polling districts,

polling places and polling stations will be undertaken by the Returning Officers staff in September with the Returning Officer putting forward his proposals.

- 3.71 We will be consulting with councillors, MPs and local political parties, and views will also be invited from residents, disability groups and other stakeholders.
- 3.72 The outcome of that review will be reported to this Committee in December to enable the necessary alterations to be made to the register of electors with the intention of (re)-publishing the electoral register on the new boundaries on 1 February 2022.
- 3.73 Regulations provide that councillors will only be entitled to a copy of the electoral register on the new boundaries, as at publication of notice of election and if they are standing as a candidate at the May elections. Registered political parties will be entitled to a copy of the register when it is published.
- 3.74 Any changes to the polling places/stations will be included on the poll cards to be despatched to all eligible electors at the local elections at the end of March 2022. Details will also be included on the Council website. Members may want to consider additional means of publicising the changes (although this would be an additional cost to the Service as it is not within existing budgets).

### **PARLIAMENTARY CONSTITUENCY ARRANGEMENTS**

- 3.75 The Boundary Commission for England is in the process of reviewing **parliamentary constituency boundaries** in England.
- 3.76 Initial proposals for each region were published by the Boundary Commission on 8 June 2021 – full details for the London Region are available at:  
<https://boundarycommissionforengland.independent.gov.uk/2023-review/london/initial-proposals-for-new-parliamentary-constituency-boundaries-in-the-london-region/page/5>
- 3.77 An extract from this report regarding the initial proposals for Bromley is included in Appendix 5.
- 3.78 The consultation period closed on 2 August 2021. All responses will be published by the Boundary Commission with a secondary consultation period in early 2022 - public hearings will be held at this stage. The Boundary Commission will then analyse those representations and may change their initial proposals. They will publish their revised proposals with a further 4-week consultation period. Final recommendations will be submitted to Parliament by the Boundary Commission in the summer of 2023.
- 3.79 The new constituencies will take effect at the next General election after the date on which the legislation is approved.
- 3.80 Under legislation the Boundary Commission can only consider ward boundaries which existed (or new ones that were approved by Parliament), as of 1 December 2020. Therefore, the Boundary Commission is not able to take Bromley's new ward boundaries into account in their initial proposals for the parliamentary boundaries (as Bromley's Order was not made until April 2021).
- 3.81 As a result, The Returning Officer now needs to compile a scheme of polling districts which identify and separate the anomalies between the current and new ward arrangements (the boundaries of these anomalies cannot be changed). This is to effectively manage the amended parliamentary constituency boundaries when they are introduced, as they will not be coterminous with the new ward arrangements. Once the arrangements have been introduced, some of these anomaly polling districts can be amalgamated into their new wards.

#### 4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

None arising from this report

#### 5. POLICY IMPLICATIONS

None arising from this report

#### 6. FINANCIAL IMPLICATIONS

The funding for the GLA Elections is met by an allowance from the GLA and the Cabinet Office has provided additional funding to directly address costs associated with making the elections Covid-secure.

#### 7. PERSONNEL IMPLICATIONS

Some Council employees are recruited by the Returning Officer to help with the various duties concerning the conduct of these polls. However, a majority of staff are recruited from other sources.

Under the provisions of section 35(6) of the Representation of the People Act 1983 the Council shall place the services of its officers at the disposal of the Returning officer.

#### 8. LEGAL IMPLICATIONS

The Council is required to designate one of its officers as Returning Officer for Local Council Elections (includes these GLA Elections) under the provisions of section 35 of the Representation of the Peoples Act 1983. The Returning Officer is personally responsible for the conduct of these elections.

The rules and regulations for the conduct of the GLA Elections are primarily contained in the Representation of the People Act 1983, 1985 and 2000, the Representation of the People (England and Wales) Regulations 2001, the Greater London Authority Act 1999, the Greater London Authority Elections Rules 2007, the Electoral Registration and Administration Act 2013 and the Coronavirus Act 2020.

#### 9. PROCUREMENT IMPLICATIONS

None arising from this report

<b>Non-Applicable Sections:</b>	[List non-applicable sections here]
Background Documents: (Access via Contact Officer)	[Title of document and date]

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## APPENDIX 1 – GLRO’s DIRECTIONS

25 March 2021

### Mayor of London and London Assembly elections on 6 May 2021

Greater London Returning Officer’s (GLRO’s) **DIRECTIONS** to Constituency Returning Officers (CROs) under Rule 11 of the Greater London Authority Elections Rules 2007 (as amended)

**Should a CRO intend to deviate from any of these directions they should provide written notice with their reasons to the GLRO as soon as this becomes apparent.**

**Most important: Revised direction 10 on count start times; and new direction 11 included on the requirement for a sample manual count to take place in each Constituency.**

#### Summary of Directions to CROs

1	Compliance with legislation, Electoral Commission (EC) Guidance, and EC Performance Standards required	CROs to coordinate the poll in line with legislation, the EC Guidance and to the required EC Performance Standards.
2	Key plans and documents to be made available on request	In line with EC Guidance and Performance Standards, CROs shall have in place not only detailed project plans, but other required documents including risk registers, integrity plans and security plans. These documents are to be made available to the GLRO on request.
3	Poll cards to include specified information about the mayoral election address booklet	CROs shall secure that information about the mayoral election address booklet is included on all poll cards, using the exact wording supplied by the GLRO below.
4	Delivery of poll cards (bulk run) to be completed <b>no later than 8<sup>th</sup> April 2021</b>	CROs shall secure the delivery of poll cards (bulk run) by <b>no later than 8<sup>th</sup> April 2021</b> to allow any elector who cannot vote in person on polling day to be able to apply for a postal or proxy vote.

5	Only postal vote packs specified by GLRO to be used	CROs shall secure that only postal vote packs as specified by the GLRO directly with all postal vote pack printers are used.
6	Issue of postal votes to start <b>no earlier</b> than <b>14<sup>th</sup> April 2021</b> and as soon after that as reasonably practicable	CROs shall secure the issue of postal votes <b>no earlier</b> than <b>14<sup>th</sup> April 2021</b> and as soon after that as reasonably practicable to allow all postal voters to receive the mayoral election address booklet before casting their votes.
7	All polling station staff to complete the on-line training programme provided by the GLRO	CROs shall secure that all persons to be appointed as polling station staff undertake and complete the whole of the on-line training programme provided by the GLRO.
8	Totems provided by the GLRO to be displayed at every polling station	CROs shall secure the display of one of the polling station totems provided by the GLRO in every polling station.
9	Each borough to include postal votes from Royal Mail sorting office 'sweep' in count	CROs shall secure the inclusion of postal votes collected via a 'sweep' of mail sorting offices on the evening of 6 May 2021 in the postal vote ballot boxes delivered to the count.
10	Count start times	CROs shall secure the count commences at <b>9am prompt</b> on Friday 7 May 2021 and <b>8am prompt</b> on Saturday 8 May with the opening of the ballot boxes. No activity is to start before the agreed times on either day.
11	Manual Count of ballot papers	CROs shall ensure that a manual count of one selected ballot box tray of ballot papers takes place at <b>2pm</b> on the day of their count.
12	GLRO to be consulted on any intention to grant a request for a re-count	CROs shall consult the GLRO on any request for a re-count which they are minded to grant before exercising their power to do so.

13	Each borough to follow Electoral Commission and GLRO guidance in preparing and delivering the poll in a coronavirus pandemic	CROs to coordinate the poll in line with EC and GLRO guidance and to follow general public health principles to mitigate the risk of coronavirus especially in managing polling station voting and at the count centres
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## Appendix 2

### ALTERNATIVE PREMISES used as POLLING STATIONS at the 2021 GLA Elections

Details of Official Polling Place	No. Polling Stations	Alternative Polling Place (used in 2021)	No. Polling Stations
Worsley Bridge Primary School, (Main Hall)	3	St Paul's Beckenham Church Hall (New)	2
Pickhurst INFANT Academy, (Main Hall)	1	Miller & Carter (formerly known as the Pickhurst) (New)	1
Highfield Junior School, (Main Foyer)	1	South Hill Wood Bowling Club (New)	1
St. Mark's C.E. Primary School, (Main Hall)	2	Vue Cinema (New)	2
Pickhurst JUNIOR Academy, (Main Hall)	2	Miller & Carter (formerly known as the Pickhurst) (New)	2
Bullers Wood School, (Eco Building)	1	St Georges Bickley Church Hall (Existing)	1
Bickley Primary School, (Main Hall)	1	St Michael's Hall (Existing)	1
Edgebury Primary School, (Main Hall)	2	The Gordon Arms (New)	1
Gray`s Farm Primary Academy, (Main Hall)	2	King Church (Kings Hall) (New)	2
Leesons Primary School	3	St Barnabus Church Hall (New)	2
Mottingham Primary School, (Main Hall)	2	Geffreys Hall Community Centre (New)	2
Parish C.E. Primary School, (School Gymnasium)	2	The Sundridge Park Club (Tennis & Squash) (New)	2
Stewart Fleming Primary School, (Main Hall)	2	The Graces Bar and Grill (New)	2
Churchfields Primary School, (Nursery Building)	2	Beckenham Social Club (New)	2
Perry Hall Primary School, (Main Hall)	1	The Cricketers Public House (New)	1
Cudham C.E. Primary School, (Main Hall)	1	Cherry Lodge Golf Club (New)	1
Darrick Wood Infant School, (Main Hall)	3	Darrick Wood Community Centre (New)	2
Bromley Beacon Academy	1	Orpington Bowling Club (New)	1
Crofton INFANT School, (Main Hall)	1	Crofton Baptist Church (Existing)	1
	33		29

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### APPENDIX 3

#### SCHOOLS used as POLLING STATIONS at the 2021 GLA ELECTIONS

Polling District	Polling Place	Details of Polling Place	No. Polling Stations
KP3	1	Marian Vian Primary School, (Childrens Centre), entrance in Kingsworth Close	2
BK1	1	Scotts Park Primary School, Orchard Road, BR1 2PR	2
BK4	1	St. George`s Bickley CE Primary School, Tylney Road, BR1 2RL	2
BT1	1	Valley Primary School, Beckenham Lane, BR2 0DA	2
CH2	1	Red Hill Primary School, Red Hill, BR7 6DA	2
CH4	1	St. Nicholas CE Primary School, (formerly known as Chislehurst CE Primary School)	2
CH5	1	St. Peter & St. Paul Catholic Primary Academy, St. Paul`s Wood Hill, BR5 2SR	1
PE3	1	Harris Girls` Academy Bromley, Lennard Road, BR3 1QR	1
PE4	1	St. John`s CE Primary School, Maple Road, SE20 8HU	2
BH1	1	Oaklands Primary Academy, Oaklands Lane, TN16 3DN	2
CB2	1	Warren Road Primary School, Warren Road, BR6 6JF	2
CE1	1	St. Paul`s Cray CE Primary School, Buttermere Road, BR5 3WD	2
CE4	1	Manor Oak Primary School, (Nursery Building), Sweeps Lane/Blacksmith`s Lane	1
FC5	1	Tubbenden Primary School, Sandy Bury, Off Tile Farm Road, BR6 9SD	1
OR2	1	Harris Primary Academy Orpington, Dyke Drive, BR5 4LZ	2
	15		26

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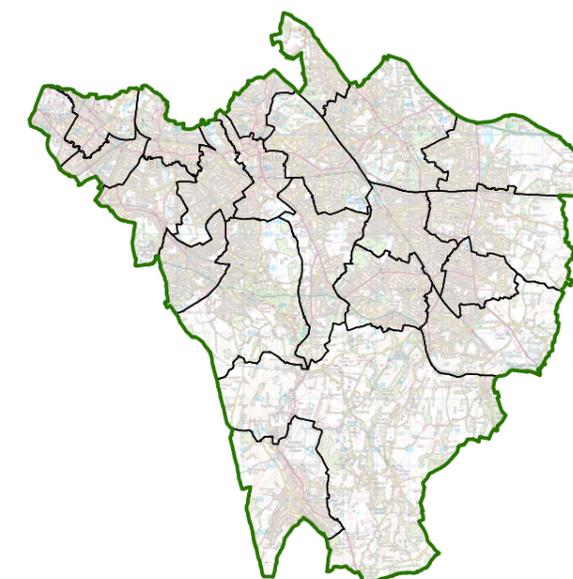
## Our Recommendations

The table lists all the wards we are proposing as part of our final recommendations along with the number of voters in each ward. The table also shows the electoral variances for each of the proposed wards which tells you how we have delivered electoral equality. Finally, the table includes electorate projections for 2025 so you can see the impact of the recommendations for the future.

# Bromley Council

## Final Recommendations on the new electoral arrangements

Ward Name	Number of councillors	Electorate (2019)	Number of electors per councillor	Variance from average (%)	Electorate (2025)	Number of electors per councillor	Variance from average (%)
Beckenham Town & Copers Cope	3	11,779	3,926	-6%	12,064	4,021	-6%
Bickley & Sundridge	3	13,276	4,425	6%	13,791	4,597	7%
Biggin Hill	2	8,535	4,268	2%	8,721	4,361	1%
Bromley Common & Holwood	3	13,799	4,600	10%	13,691	4,564	6%
Bromley Town	3	10,776	3,592	-14%	13,819	4,606	7%
Chelsfield	2	8,667	4,334	4%	8,993	4,497	5%
Chislehurst	3	11,566	3,855	-8%	11,822	3,941	-8%
Clock House	3	12,489	4,163	0%	12,553	4,184	-3%
Crystal Palace & Anerley	2	7,954	3,977	-5%	8,381	4,191	-2%
Darwin	1	4,165	4,165	0%	4,259	4,259	-1%
Farnborough & Crofton	3	13,533	4,511	8%	13,791	4,597	7%
Hayes & Coney Hall	3	12,176	4,059	-3%	12,226	4,075	-5%
Kelsey & Eden Park	3	11,824	3,941	-6%	11,974	3,991	-7%
Mottingham	2	7,906	3,953	-5%	7,878	3,939	-8%
Orpington	2	9,218	4,609	10%	9,485	4,743	10%
Penze & Cator	3	13,301	4,434	6%	13,307	4,436	3%
Petts Wood & Knoll	3	13,022	4,341	4%	13,271	4,424	3%
Plumstead	2	9,436	4,718	13%	9,135	4,568	6%
Shortlands & Park Langley	3	12,527	4,176	0%	12,445	4,148	-3%
St Mary Cray	3	13,347	4,449	6%	13,208	4,403	2%
St Paul's Cray	3	11,568	3,856	-8%	12,328	4,109	-4%
West Wickham	3	11,751	3,917	-6%	12,047	4,016	-7%
<b>Totals</b>	<b>58</b>	<b>242,615</b>	<b>-</b>	<b>-</b>	<b>249,189</b>	<b>-</b>	<b>-</b>
<b>Averages</b>	<b>-</b>	<b>-</b>	<b>4,183</b>	<b>-</b>	<b>-</b>	<b>4,296</b>	<b>-</b>



### Who we are

- The Local Government Boundary Commission for England is an independent body set up by Parliament.
- We are not part of government or any political party.
- We are accountable to Parliament through a committee of MPs chaired by the Speaker of the House of Commons.
- Our main role is to carry out electoral reviews of local authorities throughout England.

### Electoral review

An electoral review examines and proposes new electoral arrangements for a local authority, including:

- The total number of councillors representing the council's voters ('council size').
- The names, number and boundaries of wards or electoral divisions.
- The number of councillors for each ward or division.

### Why Bromley?

- The Commission has a legal duty to carry out an electoral review of each council in England 'from time to time'.
- Bromley Council has not been reviewed since 1999 and the Commission has therefore decided that it should review Bromley in advance of the elections in 2022.

### Our proposals

- Bromley Council currently has 60 councillors. Based on the evidence we received, we recommend that 58 councillors should serve the council in the future.
- We believe our final recommendations meet our statutory criteria to:
  1. Deliver electoral equality for voters
  2. Reflect community interests and identities
  3. Promote effective and convenient local government

## Summary of our recommendations

We have considered all the submissions we received during our consultations on the draft recommendations and further limited draft recommendations.

The final recommendations propose that Bromley Council should have 58 councillors, two fewer than there are now. Bromley Council should have 22 wards, the same number as there are now. The boundaries of all existing wards should change.

The 58 councillors should represent 15 three-councillor wards, six two-councillor wards and one single-councillor ward across the borough.

An outline of the proposals is shown in the map to the right. A detailed report on the recommendations and interactive mapping is available on our website at: [www.lgbce.org.uk](http://www.lgbce.org.uk).

Find out more at [consultation.lgbce.org.uk](http://consultation.lgbce.org.uk):

- view the map of our recommendations down to street level.
- zoom into the areas that interest you most.
- read the full report of our recommendations.
- find more guidance on the review process

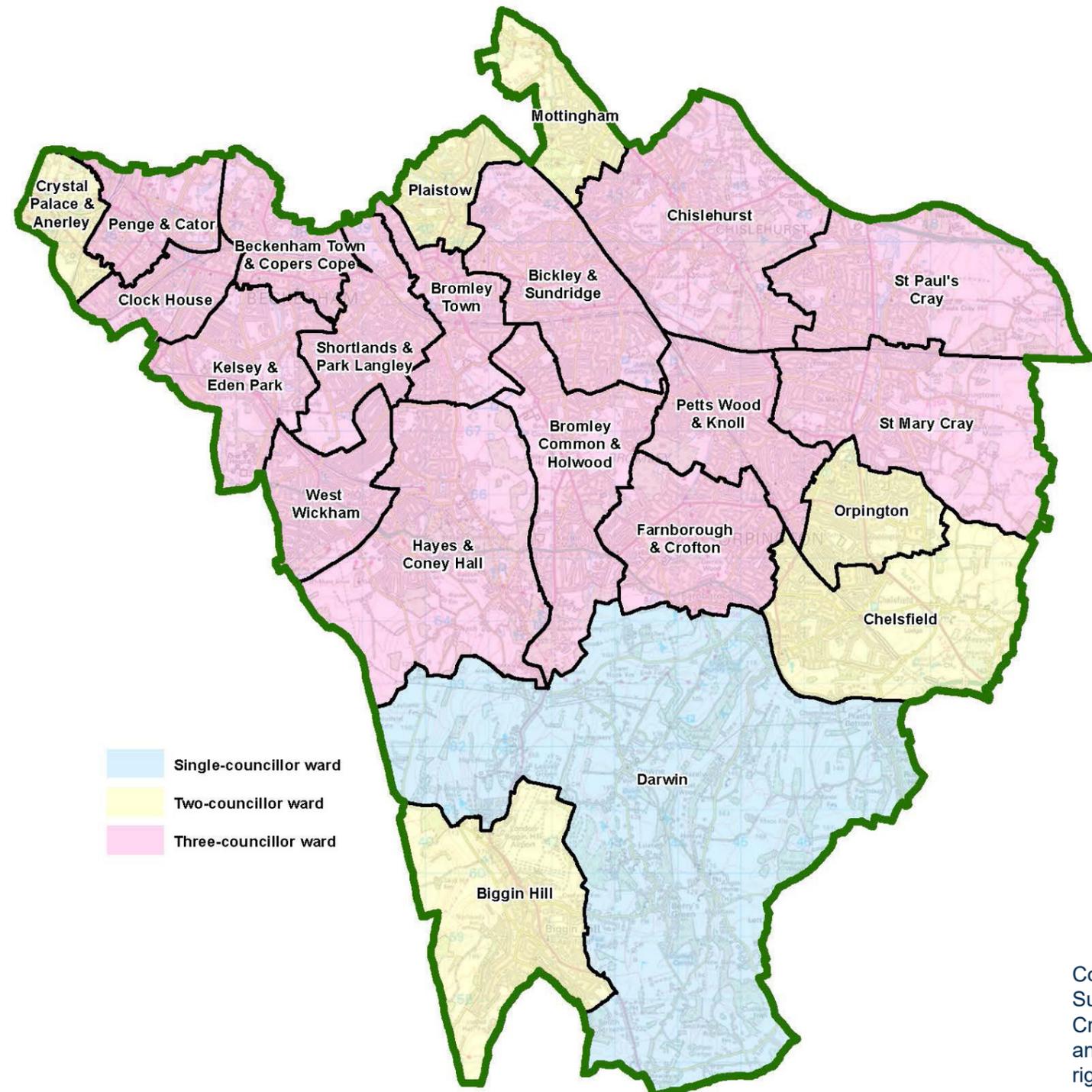
Stage of Review	Description
25 June 2019- 02 September 2019	Public consultation on warding arrangements
29 October 2019 - 17 February 2020	Public consultation on draft recommendations
16 June 2020 - 27 July 2020	Public consultation on further draft recommendations
03 November 2020	Publication of final recommendations
May 2022	Subject to parliamentary approval - implementation of new arrangements at local elections

# Overview of final recommendations for Bromley Council

View this map online and explore it in more detail at: [consultation.lgbce.org.uk](http://consultation.lgbce.org.uk)

Follow the review on Twitter: [@LGBCE](https://twitter.com/LGBCE)

If you are viewing this page online, click on the map to go straight to our interactive consultation area.



- Single-councillor ward
- Two-councillor ward
- Three-councillor ward

Contains Ordnance Survey data © Crown copyright and database rights 2020

## APPENDIX 5

Extract from Boundary Commission for England's  
INITIAL PROPOSALS for LONDON REGION  
(regarding Bromley's Parliamentary Constituencies)

.....

76. Bromley has a mathematical entitlement to 3.24 constituencies, meaning that a whole number of constituencies cannot be contained within the borough boundary, and one constituency is required to cross the boundary with either Bexley or Greenwich. We outline below our reasons for proposing a constituency that crosses the boundary between Bromley and Greenwich. Elsewhere in Bromley borough, we propose a Beckenham constituency, a Bromley constituency, and an Orpington constituency. Our proposed Beckenham constituency comprises four wards from the existing Beckenham constituency, and three wards from the existing Lewisham West and Penge constituency. Despite these changes to the existing Beckenham constituency, we consider that the name 'Beckenham' would still be appropriate for our proposed constituency, given that it would still include the centre of Beckenham and its surrounding areas.
77. Our proposed Bromley constituency consists of two wards from the existing Beckenham constituency, three wards from the existing Bromley and Chislehurst constituency, and the Petts Wood and Knoll ward from the existing Orpington constituency. We note that Bromley Common is located in the two wards currently in the Beckenham constituency (Bromley Common and Keston ward, and Hayes and Coney Hall ward) and we observe the clear north–south road links, such as the A21, running from these two wards to the centre of Bromley town. We also note the continuous residential development and the road and rail links from the Petts Wood and Knoll ward to the rest of the proposed Bromley constituency. To bring the existing Orpington constituency into the permitted electorate range, we propose that the Cray Valley West ward be included in this constituency in place of the Petts Wood and Knoll ward.
78. When considering a constituency that would extend from Bromley borough into either Bexley or Greenwich borough, we noted that Bromley is separated from Bexley by the A20 road, which runs along the borough boundary, and by areas of woodland and open space in the north-eastern part of the Chislehurst ward. However, there are continuous residential development and numerous road links across the Bromley–Greenwich boundary. We therefore consider a crossing into Greenwich to be the more attractive option in terms of community ties. To that end, we propose an Eltham and Chislehurst constituency, which comprises six wards from the existing Eltham constituency, and the two Bromley borough wards of Chislehurst, and Mottingham and Chislehurst North.

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Report No.

London Borough of Bromley

CEF21028

PART ONE / INFORMATION BRIEFING

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**Decision Maker:** **ADULT SOCIAL CARE PDS COMMITTEE**  
9th September 2021 – information only  
**CHILDREN'S SOCIAL CARE PDS COMMITTEE**  
14th September 2021 – information only  
**GENERAL PURPOSES & LICENSING**  
21st September 2021 – Part One

**Decision Type:** Non-Urgent Executive Non-Key

**Title:** **ANNUAL COMPLAINTS REPORT & LG&SCO LETTER 2020/21**

**Contact Officer:** Mark Smeed  
Head of Service, Customer Engagement & Complaints Service

**Chief Officer:** Naheed Chaudhry  
Assistant Director, Strategy, Performance and Corporate Transformation

**Ward:** Borough-wide

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1. Reason for report

- 1.1 The Council produces an Annual Complaints Report each year setting out statistics on the complaints it receives. The 2020/21 Annual Report is presented in Appendix 1.
  - 1.2 The report also provides oversight of the annual Local Government & Social Care Ombudsman letter which summarises Ombudsman complaints/enquiries received, and the decisions made about, the London Borough of Bromley for the year ending 31 March 2021.
- 

2. **RECOMMENDATION**

- 2.1 Members of the Committee are asked to note, consider and comment on the report.

### Impact on Vulnerable Adults and Children

1. Summary of Impact: Not Applicable
- 

### Corporate Policy

1. Policy Status: Not Applicable
  2. BBB Priority Not Applicable:
- 

### Financial

1. Cost of proposal: Not Applicable
  2. Ongoing costs Not Applicable:
  3. Budget head/performance centre: Not Applicable
  4. Total current budget for this head: £Not Applicable
  5. Source of funding: Not Applicable
- 

### Personnel

1. Number of staff (current and additional): Not Applicable
  2. If from existing staff resources, number of staff hours: Not Applicable
- 

### Legal

1. Legal Requirement: Statutory Requirement
  2. Call-in: Applicable: Executive decision.
- 

### Procurement

1. Summary of Procurement Implications: Not Applicable
- 

### Customer Impact

1. Estimated number of users/beneficiaries (current and projected): Not Applicable
- 

### Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not Applicable
2. Summary of Ward Councillors comments: Not Applicable

### 3. COMMENTARY

#### Complaints

- 3.1 The publication of annual reports on social care complaints is a statutory requirement under the Local Authority Social Services and National Health Service Complaints (England) Regulations 2009 (for adult social care) and the Children Act 1989 Representations Procedure (England) Regulations 2006 (for children's social care). Whilst legislation mainly refers to social care complaints, the Council goes further and publishes greater detail about the Council's performance across the divisions.
- 3.2 The Council has an ethos of continuous improvement and is committed to using feedback from a variety of sources to learn, understand and take action to improve services. Our Performance Management Frameworks recognise customer complaints as a valuable source of qualitative feedback on the performance of our services. Where possible, lessons are learnt by the Directorates and an internal report is produced so that reflections and improvements can be made to services.
- 3.3 The report at Appendix 1 provides an overview of complaints and all Local Government & Social Care Ombudsman enquiries to the Council between 1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2021.
- 3.4 Overall, the Council received 542 complaints during 2020/21, representing a 17% reduction on last year (656). 44% of complaints were partially upheld or upheld against the Council, which is similar to the previous year. 59% of complaints were responded to on time, an improvement on 47% last year and an area of ongoing improvement.

#### Local Government & Social Care Ombudsman

- 3.5 The Local Government & Social Care Ombudsman ('the Ombudsman') acts as the final stage for complaints about local authorities, adult social care providers (including care homes and home care agencies) and some other organisations providing public services. When the Council responds to a complaint, we are required to signpost the complainant to the Ombudsman if they remain dissatisfied. The Ombudsman analyses each referral to determine firstly whether it meets their criteria and, secondly, whether it merits a full investigation.
- 3.6 The Ombudsman stopped accepting new complaints for approximately three months from April to June 2020, which was to enable local authorities to divert resources to tackling the pandemic. Bromley Council sustained a business as usual approach to managing complaints throughout pandemic despite complaints staff, including the Head of Service, being seconded to Covid-19 programmes. The Ombudsman's temporary closure goes some way to explain the significant reduction in referrals about Bromley - during the year 2020/21 Bromley was the subject of 86 referrals to the Ombudsman, 63 (43%) less than the previous year. Of those 86 referrals, 38 became the subject of an investigation by the Ombudsman, and from those full investigations, 26 were upheld against the Council (68%). This is better than the London average and in line with Bromley's performance of the previous year (65%).
- 3.7 The average upheld rate across London boroughs was 72%, placing Bromley joint 11<sup>th</sup> out of the 32 boroughs. Measured by referrals *per capita*, Bromley ranked 6<sup>th</sup>, meaning that the Council's figures remain competitive.
- 3.8 The Council sustains thoughtful and robust engagement with the Ombudsman challenging decisions where required. Last year's covering report mentioned the Council had served a pre-action judicial review protocol letter upon the Ombudsman, which led to a previous critical decision being withdrawn and the investigation discontinued without findings. A similar action is being considered in another case in this financial year.

- 3.9 Whilst being robust in our considerations of recommendations for some cases, we have retained a 100% compliance rate in implementing recommendations on all other cases.
- 3.10 The Ombudsman’s annual review letter provides a breakdown of the upheld investigations and a compliance rate for implementing Ombudsman recommendations.
- 3.11 This year’s letter contained some commentary that requires context. Firstly, there was a suggestion that some responses to investigations were either late or not complete. During 2020/21 we recorded 259 separate deadlines to the Ombudsman, of which 84% were responded to within the expected timescale. No complaint outcomes have been affected by any such issue.
- 3.12 Secondly, this year’s letter contains a reference to the Council’s occasional practice of requesting a further opportunity to comment on draft decisions. This allows the Council to challenge Ombudsman’s decisions where required, asking them to issue a revised draft, but this is also an opportunity to swiftly implement remedial action for service users before decisions are published.
- 3.13 Finally, there is a reference to a reduction of effective complaint functions in all local authorities. This is a general observation, rather than specific to Bromley, and follows national comments made by Michael King, the Local Government & Social Care Ombudsman, in emphasising the critical importance of a properly resourced and managed complaint handling service.

**4. FINANCIAL IMPLICATIONS**

- 4.1 None for the purposes of this report.

**5. LEGAL IMPLICATIONS**

- 5.1 Under regulation 18 of the Local Authority Social Services and National Health Service Complaints Regulations 2009 the Council is required to publish an annual complaints report.
- 5.2 Under section 5(2) of the Local Government and Housing Act 1989 the Monitoring Officer is expected to produce a periodic report to the Council summarising the findings on all upheld complaints over a specific period.

**6. Supporting Documents**

- 6.1 Appendix 1. Annual Complaints Report 2020/21
- 6.2 Link below to LG&SCO annual letter 2020/21

<https://www.lgo.org.uk/documents/councilperformance/2021/london%20borough%20of%20bromley.pdf>

<b>Non-Applicable Sections:</b>	Impact on Vulnerable Adults and Children, and Policy, Personnel and Procurement Implications.
<b>Background Documents:</b>  (Access via Contact Officer)	



# Complaints & Compliments

Annual Report 2020-2021



THE LONDON BOROUGH

# CONTENTS

CONTENTS.....	1
01   WHY WE REPORT ON OUR COMPLAINTS.....	2
02   LAW & PROCEDURES .....	3
03   COUNCIL OVERVIEW .....	4
04   ADULT SOCIAL CARE.....	9
05   CHILDREN'S SOCIAL CARE.....	14
06   HOUSING.....	19
07   PLANNING & REGENERATION .....	24
08   EDUCATION .....	29
09   CHIEF EXECUTIVE'S DEPARTMENT .....	34
10   ENVIRONMENT & PUBLIC PROTECTION .....	40
11   PUBLIC HEALTH.....	43

## 01 | WHY WE REPORT ON OUR COMPLAINTS

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Section 18 of The Local Authority Social Services and National Health Service Complaints (England) Regulations 2009 places a duty on the Council to prepare an annual report each year. Whilst that legislation primarily references social care complaints, the London Borough of Bromley goes further and publishes greater detail about the Council's performance. This report therefore provides an overview of complaints and our interaction with the Local Government & Social Care Ombudsman between 1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2021.

The Council has an ethos of continuous improvement and is committed to using feedback from a variety of sources to learn, understand and take action to improve services. Our Performance Management Frameworks recognise customer complaints as a valuable source of qualitative feedback on the performance of our services.

We know that high-performing services use feedback to help managers and staff understand where they are doing well and where improvements can be made.

We use our complaints data and analysis to:

- ➔ Collaboratively prompt, challenge and deepen the understanding of service performance amongst the leadership group; this enables and promotes a shared understanding of the strengths and areas for development within the service
- ➔ Inform prioritisation in service improvement plans
- ➔ Commission improvement activities and training where appropriate
- ➔ Encourage individual managers to take the initiative at service/team level or with individual staff members to address areas for development and manage local improvements

### Terminology used in this report

A **complaint** is the whole of someone's approach to the Council expressing dissatisfaction. One or more services or teams may be referenced in that complaint, and each of those is referred to as a **mention**. Each complaint may identify one or more individual grievances and each of those is referred to as an **aspect**.

For instance...

*Mrs Jones raises a complaint with the Council alleging that the Council Tax department have both delayed processing her application for support and disclosed her personal information when they should not have done. She also complains that the Housing Benefit team have wrongly decided she is not eligible for support.*

In this example, this one complaint has given rise to three mentions (two for Council Tax and one for Housing Benefit) and three aspects – delay, data breach and a disputed decision.

### Legislation

The main legislation we are governed by is the Local Authority Social Services and National Health Service Complaints (England) Regulations 2009. This duty is delivered through the Corporate Complaints Procedure. The majority of Adult Social Care complaints are considered on a statutory basis and are managed through the Corporate Complaints Procedure.

Where the matter directly involves a child (or an authorised person on their behalf) complaining about the care and support provided to that child by Children's Social Care, the relevant rules are found in the Children Act 1989 Representations Procedure (England) Regulations 2006) and this duty is delivered through the Children's Complaints Procedure.

### Timescales

Under the Corporate Complaints Procedure, complaints should be acknowledged within 3 working days and formally responded to within 20 working days. Complaints are managed through the Children's Complaints Procedure as follows :-

- ➔ Stage 1 initial response within 10 (up to 20) working days
- ➔ Stage 2 investigation within 25 (up to 65) working days
- ➔ Stage 3 Review Panel within 30 working days

Where a complaint may not be responded to within the usual timescales, for whatever reason, CE&CS will keep in touch with the complainant to explain the reasons for the delay and wherever possible provide a best estimate as to when the response will be available.

### The Local Government & Social Care Ombudsman

The Local Government & Social Care Ombudsman (LG&SCO) acts as the final stage for complaints about local authorities, adult social care providers (including care homes and home care agencies) and some other organisations providing public services. When the Council responds to a complaint, we are required to signpost the complainant to the Ombudsman if they remain dissatisfied. The Ombudsman analyses each referral to determine whether it meets their criteria and, if so, whether it merits a full investigation.

## 03 | COUNCIL OVERVIEW

### Complaints received

Division	2018/19	2019/20	2020/21	% change
Adult Social Care	142	117	<b>57</b>	-51.3%
Children's Social Care	114	105	<b>77</b>	-26.7%
Housing	118	90	<b>78</b>	-13.3%
Planning & Regeneration	-	-	<b>25</b>	n/a
Education	44	38	<b>23</b>	-39.5%
Chief Executive's Dept.	66	95	<b>75</b>	-21.1%
Public Health	0	0	<b>0</b>	n/a
<b>Total</b>	<b>484</b>	<b>445</b>	<b>335</b>	<b>-24.7%</b>
Environment & Public Protection	384	211	<b>207</b>	-1.9%

The Council received 542 complaints during 2020/21, a 17% decrease on the 656 from the previous year.

### How complaints were received

Source	Adult	Children	Housing	P&R	Education	EPP	CED	Public Health	Total	% of total
Email	38	37	57	15	13	114	52	0	326	60.1%
Form	0	0	0	0	0	0	0	0	0	0.0%
In person	0	0	0	0	0	0	0	0	0	0.0%
Letter	0	0	0	1	0	3	1	0	5	0.9%
Telephone	5	3	2	0	1	3	2	0	16	3.0%
Website	14	37	19	9	9	87	20	0	195	36.0%
<b>Total</b>	<b>57</b>	<b>77</b>	<b>78</b>	<b>25</b>	<b>23</b>	<b>207</b>	<b>75</b>	<b>0</b>	<b>542</b>	

96.1% of complaints were received by email or through the website, a significant increase in the use of our digital channels from 82.7% last year.

## Proportion upheld

	Aspects	Upheld / Partially Upheld	% 2020/21	% 2019/20
Adult Social Care	68	38	<b>56%</b>	49%
Children's Social Care	110	48	<b>44%</b>	45%
Housing	93	33	<b>35%</b>	29%
Planning & Regeneration	33	9	<b>27%</b>	-
Education	33	13	<b>39%</b>	55%
Chief Executive's Dept.	97	48	<b>49%</b>	42%
Public Health	0	0	<b>N/A</b>	N/A
<b>TOTAL</b>	<b>434</b>	<b>189</b>	<b>44%</b>	<b>44%</b>
Environment & Public Protection	<i>Data not currently collected</i>			

44% of complaints were at least partially upheld, steady compared to the previous year.

The upheld rate reflects our approach to acknowledge fault where appropriate and seek to put things right as far as can be achieved.

### Causes for complaint

The most frequent cause for complaint (aspect) was quality of service (41%), one-fifth of which were upheld. Lack of action (18.6%) was the next most prevalent. Complaints about staff conduct were the most likely to be upheld.

Complaints about staff conduct can include staff of third-party providers contracted by the Council.

Complaint	Adult	Children	Housing	P&R	Education	EPP	CED	Public Health	Total	% of total	% upheld
Staff conduct	7	32	9	2	5	18	1	0	74	11.5%	31.1%
Disputed Decision	7	11	6	8	3	25	4	0	64	10.0%	9.4%
Information	11	12	4	9	9	13	7	0	65	10.1%	18.5%
Lack of Action	14	19	23	4	7	38	14	0	119	18.6%	21.0%
Quality of Service	22	33	51	9	7	113	28	0	263	41.0%	20.2%
Service Delay	2	2	0	1	2	-	4	0	11	1.7%	27.3%
Behaviour of another	0	1	0	0	0	-	-	-	1	0.2%	100.0%
Billing / Charging	5	-	-	-	-	-	39	-	44	6.9%	9.1%
<b>Total</b>	<b>68</b>	<b>110</b>	<b>93</b>	<b>33</b>	<b>33</b>	<b>207</b>	<b>97</b>	<b>0</b>	<b>641</b>		

## Responding on time

59% of all complaints were responded to within 20 working days, an improvement compared to last year's 47%. Complaints involving contracted services can take longer to address as the Council is ultimately responsible for the quality of their services.

Some of this improvement reflects the well-attended additional 'Complaints Handling' training delivered by the Council, leading to an increased quality of response and a consequential improvement in response times. An increased focus on the lessons to be learnt from complaints may also assist in lowering the upheld percentage.

Division	2018/19	2019/20	2020/21
Adult Social Care	37%	35%	<b>37%</b>
Children's Social Care	43%	43%	<b>58%</b>
Housing	56%	63%	<b>72%</b>
Planning & Regeneration	n/a	n/a	<b>48%</b>
Education	44%	45%	<b>48%</b>
Chief Executive's Dept.	70%	54%	<b>52%</b>
Public Health	-	-	-
<b>OVERALL</b>	<b>48%</b>	<b>47%</b>	<b>59%</b>
Environment & Public Protection	-	-	-

## Local Government & Social Care Ombudsman cases

The Council handled 93 Ombudsman cases during the year. Those generated 259 individual Ombudsman response deadlines - only 12% down on the 298 for the previous year - of which 84.1% were responded to within timescale.

The Council was the subject of 38 investigations by the Ombudsman during the year. Of the 38 investigated complaints, 26 were upheld against the Council (68%). Fewer complaints were upheld against the Council than the London average of 72%, therefore placing Bromley 11<sup>th</sup> best in London. 26 Ombudsman complaints upheld equate to 0.08 complaints upheld per 1000 residents.

## 2020-2021 Annual Review letter

Every year the Ombudsman publishes an annual review letter for each Council, accompanied by the statistics they hold. For the year 2020-21 their figures disclose the following :-

	2018 - 19	2019 - 20	2020 - 21	% change
Referrals	139	149	<b>103</b>	-31%
Resulting investigations	42	43	<b>38</b>	-11.6%
Proportion investigated	30%	29%	<b>37%</b>	+8%
Number upheld	33	28	<b>26</b>	-7%
Upheld rate	78%	65%	<b>69%</b>	+4%
London average	63%	70%	<b>73%</b>	+3%
London ranking	Joint 30 <sup>th</sup>	Joint 7 <sup>th</sup>	<b>Joint 11<sup>th</sup></b>	

The table above shows the Council maintaining its positive progress in its dealings with the Ombudsman.

The upheld rate is a primary indicator of performance and here the Council has retained its place in the top third of London boroughs, its upheld rate being 4% better than the London average.

The Ombudsman's upheld statistics include those complaints where the Ombudsman would determine that the Council had already provided a satisfactory remedy before the complaint reached the Ombudsman – in this year, that was 15% for the Council, against a London average of 12%.

## Financial consequences of complaints

		Adults	Children's	Housing	P&R	Education	EPP	CED	TOTALS
Ombudsman	Compensation & Backdating	£250.00	£800.00	£6,250.00	£0.00	£1,400.00	£0.00	£0.00	<b>£8,700.00</b>
	Written off	£9,291.50	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	<b>£9,291.50</b>
	Time & trouble	£850.00	£200.00	£0.00	£0.00	£200.00	£0.00	£0.00	<b>£1,250.00</b>
Stage 1	Compensation & Backdating	£4,000.00	£0.00	£250.00	£0.00	£2,700.00	£0.00	£121.00	<b>£7,071.00</b>
	Written off	£5,645.07	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	<b>£5,645.07</b>
	Time & trouble	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	<b>£0.00</b>
	Expert fees	£3,504.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	<b>£3,504.00</b>
<b>Total</b>		<b>£23,540.57</b>	<b>£1,000.00</b>	<b>£6,500.00</b>	<b>£0.00</b>	<b>£4,300.00</b>	<b>£0.00</b>	<b>£121.00</b>	<b>£35,461.57</b>

Compensation figures include any cases where it was determined the Council should backdate support or allowances.

The total of £35,461.57 is a 4% decrease on last year's £37,095.67. It should be borne in mind that annual totals are often skewed by one or two specific cases, when the vast majority do not result in any significant financial outlay.

## Compliments

Division	2019/20	2020/21	% change
Adult Social Care	28	<b>33</b>	18%
Children's Social Care	48	<b>47</b>	-2%
Housing	284	<b>108</b>	-62%
Planning & Regeneration	n/a	<b>1</b>	n/a
Education	4	<b>22</b>	450%
Chief Executive's Dept.	0	<b>12</b>	n/a
Environment & Public Protection	56	<b>59</b>	5%
<b>Total</b>	<b>420</b>	<b>282</b>	<b>-33%</b>

## 04 | ADULT SOCIAL CARE

Under the Local Authority Social Services and National Health Service Complaints (England) Regulations 2009 the majority of Adult Social Complaints are considered on a statutory basis and handled through the Council's corporate complaints procedure.

### At a glance

	2018 - 19	2019 - 2020	2020 - 21	% on prev. year
<b>Complaints</b>	142	117	<b>57</b>	-51%
Percentage responded to on time	37%	35%	<b>37%</b>	2%
Percentage fully upheld	37%	28%	<b>28%</b>	0%
Percentage partially upheld	18%	21%	<b>28%</b>	7%
New Ombudsman cases	15	9	<b>4</b>	-56%
Ombudsman cases upheld	3	6	<b>6</b>	0%
Financial consequences	£1,677.25	£10,057.76	<b>£23,540.57</b>	
<b>Compliments</b>	45	28	<b>33</b>	18%

### Complaints received

The Adult Social Care division was the subject of 57 complaints during 2020-21. 38% of individual complaint aspects were responded to on time, contributing to an overall figure of 38% of complaint responses involving Adult Social Care being responded to in a timely way. 56% of complaints were fully or partially upheld, a 7% increase on last year's 49%.

Those 57 complaints gave rise to 57 mentions and 68 individual aspects (please refer to the Terminology section).

'Contracted Services' refers to those third-party providers of residential and domiciliary care whom the Council engages to provide care to its service users, for which the Council usually remains ultimately responsible. As noted on page 8, complaints involving third party providers can often take longer to resolve and as this year Contracted Services were involved in 19% of complaint aspects, and this will have contributed to the timeliness figure.

The table below sets out the individual complaint aspects for the different services and teams within Adult Social Care.

Service	Mentions this year	Aspects this year	Fully upheld	Partially upheld	Not upheld	Ongoing	Answered on time
Blue Badges	5	5	2	2	1	0	3
%	9%	7%	40%	40%	20%	0%	60%
Complex Care East	0	0	0	0	0	0	0
%	0%	0%	0%	0%	0%	0%	0%
Complex Care West	9	9	2	3	4	0	4
%	16%	13%	22%	33%	44%	0%	44%
Coordination & Review	1	1	0	1	0	0	0
%	2%	1%	0%	100%	0%	0%	0%
Duty Team	5	4	2	2	0	0	1
%	9%	6%	50%	50%	0%	0%	25%
Hospital Team	7	9	4	1	4	0	2
%	12%	13%	44%	11%	44%	0%	22%
Initial Response	6	8	2	2	4	0	4
%	11%	12%	25%	25%	50%	0%	50%
Reablement & Rehab	6	7	3	0	4	0	6
%	11%	10%	43%	0%	57%	0%	86%
Occupational Therapy	0	0	0	0	0	0	0
%	0%	0%	0%	0%	0%	0%	0%
Learning Disability	3	4	0	1	3	0	1
%	5%	6%	0%	25%	75%	0%	25%
CMHT Oxleas	3	3	1	0	2	0	1
%	5%	4%	33%	0%	67%	0%	33%
DOLs	0	0	0	0	0	0	0
%	0%	0%	0%	0%	0%	0%	0%
Safeguarding	0	0	0	0	0	0	0
%	0%	0%	0%	0%	0%	0%	0%
Care Link	0	0	0	0	0	0	0
%	0%	0%	0%	0%	0%	0%	0%
Extra Care Housing	0	0	0	0	0	0	0
%	0%	0%	0%	0%	0%	0%	0%
LD Provider Services	0	0	0	0	0	0	0
%	0%	0%	0%	0%	0%	0%	0%
Reablement Provider Service	1	1	0	0	1	0	0
%	2%	1%	0%	0%	100%	0%	0%
Brokerage	3	4	0	1	3	0	1
%	5%	6%	0%	25%	75%	0%	25%
Contracted Services	11	13	3	6	4	0	3
%	19%	19%	23%	46%	31%	0%	23%
<b>OVERALL</b>	<b>57</b>	<b>68</b>	<b>19</b>	<b>19</b>	<b>30</b>	<b>0</b>	<b>26</b>
			28%	28%	44%	0%	38%

## Nature of complaint and outcome

The majority of complaints (32%) were in relation to the quality of service received, of which 59% were at least partially upheld.

Subject	Aspects this year	Fully upheld	Partially upheld	Not upheld	Ongoing	Answered on time
Staff conduct	7	1	6	0	0	4
%	10%	14%	86%	0%	0%	57%
Disputed decision	7	0	3	4	0	0
%	10%	0%	43%	57%	0%	0%
Information	11	3	2	6	0	4
%	16%	27%	18%	55%	0%	36%
Lack of action	14	3	1	10	0	9
%	21%	21%	7%	71%	0%	64%
Quality of service	22	7	6	9	0	6
%	32%	32%	27%	41%	0%	27%
Service Delay	2	1	1	0	0	1
%	3%	50%	50%	0%	0%	50%
Billing & Charging	5	4	0	1	0	2
%	7%	80%	0%	20%	0%	40%
Behaviour of another service user	0	0	0	0	0	0
%	0%	0%	0%	0%	0%	0%
<b>OVERALL</b>	<b>68</b>	<b>19</b>	<b>19</b>	<b>30</b>	<b>0</b>	<b>26</b>
		28%	28%	44%	0%	38%

## Compliments

As much as we like to learn from complaints, we like to learn from compliments too. The following are examples of the compliments recorded this year :-

I met a Reablement carer there yesterday and she was amazing with Mrs L and already has managed to get her to have a shower...Mrs L was very happy with this support and I could see a vast improvement which was fantastic; thank you.

*I would just like to take this opportunity to thank you for all your help with this matter over the last few weeks. Your professionalism and care have been very much appreciated, particularly during such a busy and challenging time, thank you.*

It was great to speak with you yesterday too. Thank you for sending through the summary of our conversation, it is a huge relief to know that I now have a single point of contact to discuss these issues with and that someone is going to follow up on all the points raised.

*Thank you for your help with mum's care after her accident. Please pass on our thanks to all the carers who assisted mum during her recovery. Mum was very pleased with the attitude and professionalism of all the carers involved and has asked me to pass on her thanks to all the team.*

During my conversation with her she wanted to take the time to say thank you for our involvement. She also wanted to praise the manner in which you completed your visit. You made her feel very comfortable; you did not rush or pressure her, and you agreed to go for a coffee to discuss the referral and concerns being raised. She could not face someone entering her property as she was embarrassed.

*It has always been on our mind to highlight the fantastic work done and express our sincere gratitude for the hard work and dedication by your Team during the Transition and CTR process for our son...We really want to acknowledge the AMAZING WORK done by his adult social worker, who tirelessly worked with the whole Team to successfully get him into his current supported living accommodation.*

I just wanted to write to you to thank you from the bottom of my heart for all your help in finding M a permanent placement. I cannot begin to tell you what it has meant to myself and all her family that you took so much care in finding her a place for life, that totally fits with her needs. This placement is down to you - your professionalism in dealing with M, and not accepting anything but the best for her, has enabled us as a family, to feel that she is now in the best hands she can be, and can look forward to a happy and fulfilling life. We will always be grateful to you.

*My elderly mum just wanted to pass on all her thanks and gratitude to the OT Team at Bromley. We both just wanted to say a big thanks to T and N - both have been marvellous. They are simply 'the best', they have been not only supporting but really loving and caring towards my elderly mum and dad. They work tirelessly to help and support people with compassion and go above and beyond to help. These guys are the Crown Jewels of the Bromley Service and assets to the council. We can't praise them both enough. Please pass in all our thanks as service users for all their hard work and commitment.*

## Local Government & Social Care Ombudsman cases

The Ombudsman recorded 11 new Adult Social Care referrals during 2020-21. Of the 12 decisions made during the year, six were upheld.

Ombudsman outcomes	NFA	No jurisdiction	Premature	NFA	No maladmin'n	NFA	Maladmin & Injustice	Maladmin, no injustice	Already remedied	TOTAL	Ongoing
Blue Badges	0	0	0	0	0	0	0	0	0	0	0
Brokerage	0	0	0	0	0	0	0	0	0	0	0
CMHT/Oxleas	0	0	0	0	0	0	2	0	0	2	0
Complex Care West	0	0	0	0	0	0	2	0	0	2	0
Coord'n & Review	0	0	0	0	0	0	0	0	0	0	0
Creative Support	0	0	0	0	0	0	0	0	0	0	0
Duty Team	0	0	0	0	0	0	1	0	0	1	0
Initial Response	0	0	0	0	0	0	0	0	0	0	0
Learning Disability	0	0	0	0	0	0	0	0	0	0	0
Reablement & Rehab	0	0	0	0	1	0	0	0	0	1	1
Safeguarding	2	2	1	0	0	0	1	0	0	6	1
<b>OVERALL</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>0</b>	<b>12</b>	<b>2</b>

## Financial consequences of complaints

	2018 - 19	2019 - 20	2020 - 21
<b>Ombudsman cases</b>			
Compensation / backdated payments	-	100.00	<b>£250.00</b>
Charges written off	1,173.85	7,922.83	<b>£9,291.50</b>
Time & trouble payments	200.00	250.00	<b>£850.00</b>
<b>Stage 1 complaints</b>			
Compensation / backdated payments	-	367.00	<b>£4,000.00</b>
Charges written off	303.40	1,417.93	<b>£5,645.07</b>
Time & trouble payments	-	0.00	<b>£0.00</b>
Expert fees	-	-	<b>£3,504.00</b>
<b>TOTALS</b>	<b>1,677.25</b>	<b>10,057.76</b>	<b>£23,540.57</b>

## 05 | CHILDREN'S SOCIAL CARE

The Council's experience is that only a small proportion of Children's Social Care complaints it receives are actually from young people or those acting on their behalf, which therefore fall to be processed under the three-stage procedure set out in The Children Act 1989 Representations Procedure (England) Regulations 2006. These are referred to as statutory complaints, the timescales for which are :-

- Stage 1 : Initial response within 10 (up to 20) working days
- Stage 2 : Investigation within 25 (up to 65) working days
- Stage 3 : Review Panel within 30 working days

All other complaints from parents, family or friends raising issues that do not directly relate to the quality of the care and support the child in question receives are managed through the corporate complaints procedure. We carefully consider each complaint on its own merits and determines through which procedure it should be processed.

Children and young people making a complaint have a legal entitlement to advocacy services to support them in making a complaint or expressing their views. Where the child involved has not already been referred, the Complaints Team will refer complaints made by or on behalf of children in relation to Children Social Care to the independently commissioned Advocacy service.

### At a glance

	2018 - 19	2019 - 2020	2020 - 21	% on prev. year
<b>Complaints</b>	114	99	<b>74</b>	-25%
Statutory complaints	6	6	<b>3</b>	-50%
Percentage responded to on time	43%	45%	<b>58%</b>	13%
Percentage fully upheld	23%	27%	<b>19%</b>	-8%
Percentage partially upheld	21%	17%	<b>25%</b>	8%
New Ombudsman cases	11	22	<b>10</b>	-55%
Ombudsman cases upheld	2	2	<b>6</b>	200%
Financial consequences	£16,907.52	£11,171.52	<b>£1,000.00</b>	
<b>Compliments</b>	33	48	<b>47</b>	-2%

## Complaints under the 1989 Representations Procedure

The numbers of statutory complaints remained largely static.

	2018 - 19	2019 - 20	2020 - 21
Stage 1	6	6	3
Stage 2	3	1	2
Stage 3	0	0	0
<b>Total</b>	<b>9</b>	<b>7</b>	<b>5</b>

## Complaints under the Council's Corporate Complaints Procedure

The table below sets out the individual complaint aspects for the different services and teams within Children's Social Care.

Service	Mentions this year	Aspects this year	Fully upheld	Partially upheld	Not upheld	Ongoing	Answered on time
Early Intervention & Family Support	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
%	0%	0%	0%	0%	0%	0%	0%
Referral & Assessment, incl. MASH, Atlas & ECT	<b>18</b>	<b>24</b>	<b>3</b>	<b>9</b>	<b>12</b>	<b>0</b>	<b>10</b>
%	21%	22%	13%	38%	50%	0%	42%
SG&CP East incl. Court Team	<b>15</b>	<b>22</b>	<b>4</b>	<b>5</b>	<b>13</b>	<b>0</b>	<b>21</b>
%	17%	20%	18%	23%	59%	0%	95%
SG&CP West	<b>22</b>	<b>30</b>	<b>3</b>	<b>7</b>	<b>20</b>	<b>0</b>	<b>19</b>
%	26%	27%	10%	23%	67%	0%	63%
Children Looked After and Care Leavers	<b>8</b>	<b>10</b>	<b>3</b>	<b>1</b>	<b>6</b>	<b>0</b>	<b>9</b>
%	9%	9%	30%	10%	60%	0%	90%
Fostering, Adoption and Resources (incl. CWD)	<b>19</b>	<b>19</b>	<b>7</b>	<b>5</b>	<b>7</b>	<b>0</b>	<b>8</b>
%	22%	17%	37%	26%	37%	0%	42%
Quality Assurance	<b>4</b>	<b>5</b>	<b>1</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>5</b>
%	5%	5%	20%	0%	80%	0%	100%
<b>OVERALL</b>	<b>86</b>	<b>110</b>	<b>21</b>	<b>27</b>	<b>62</b>	<b>0</b>	<b>72</b>
			19%	25%	56%	0%	65%

The Children's Social Care division was the subject of 74 corporate complaints during 2020-21. 65% of individual complaint aspects were responded to on time, contributing to an overall figure of 58% of complaint responses involving Children's Social Care being responded to in a timely way. 46% of complaints were fully or partially upheld, a 1% increase on last year's 45%.

Those 74 complaints gave rise to 86 mentions and 110 individual aspects (please refer to the Terminology section).

## Nature of complaint and outcome

The majority of complaints (30%) were in relation to quality of service issues of which 60% were at least partly upheld.

Subject	Aspects this year	Fully upheld	Partially upheld	Not upheld	Ongoing	Answered on time
Staff conduct	<b>32</b>	<b>4</b>	<b>8</b>	<b>20</b>	<b>0</b>	<b>23</b>
%	29%	13%	25%	63%	0%	72%
Disputed decision	<b>11</b>	<b>1</b>	<b>1</b>	<b>9</b>	<b>0</b>	<b>8</b>
%	10%	9%	9%	82%	0%	73%
Information	<b>12</b>	<b>1</b>	<b>3</b>	<b>8</b>	<b>0</b>	<b>7</b>
%	11%	8%	25%	67%	0%	58%
Lack of action	<b>19</b>	<b>6</b>	<b>3</b>	<b>10</b>	<b>0</b>	<b>11</b>
%	17%	32%	16%	53%	0%	58%
Quality of service	<b>33</b>	<b>9</b>	<b>11</b>	<b>13</b>	<b>0</b>	<b>21</b>
%	30%	27%	33%	39%	0%	64%
Service Delay	<b>2</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>2</b>
%	2%	0%	0%	100%	0%	100%
Behaviour of another service user	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>
%	1%	0%	100%	0%	0%	0%
<b>OVERALL</b>	<b>110</b>	<b>21</b>	<b>27</b>	<b>62</b>	<b>0</b>	<b>72</b>
		19%	25%	56%	0%	65%

## Compliments

As much as we like to learn from complaints we like to learn from compliments too. The following are examples of those received this year :-

Omg they are truly amazing. I needed their help when my son was diagnosed with ADHD and help with the whole school process. I had a man called G, I couldn't recommend him more, amazing caring man.

*The Local Authority have worked tirelessly to ensure that these children's needs are both understood and met. I have been consistently impressed with W's commitment to the children and her willingness to go above and beyond for them both.*

From the bottom of my heart I say a VERY BIG THANK YOU to all the social worker DISABLE TEAM who has make this come true because I never dream this can happen soon, you have gone extra mile even out of way, to pick me and my son on the street in an horrible situation and help us find a better life and meaning future, you people did not only show you are Social worker but also a mother who has passionate for children.....I AM delighted and overwhelmed.

*I was contacted by J...I found her professionalism and interpersonal skills exceptional, whilst dealing with myself and taking notes going through my personal history she remained her professional at all times and listened to what I had to say. In my opinion that her selfless attitude and kind listening ear was a refreshing change, I have had many dealings with various companies over the phone and J really impressed me in how she conducted the whole process and I hope this is passed to her manager and filtered down to her.*

It was lovely to meet you today, thank you for coming along, you were really good with both child and dad, I felt as a team we worked well together, it always makes our job easier when we work with someone who is so approachable and engaging with the families.

*I know that you are too modest to accept praises but I am going to say it anyway, it's all down to your determination, kindness ,tenacity, compassion, empathy, enduring sense of fairness, duty and your hard work. You are truly in my eyes what a true public servant should be.*

Please don't apologise, really appreciate the information, and the chat with S. You guys are just so amazing. I can't thank you enough for all your help and support!

*I just wanted to take this opportunity to feedback what a pleasure it has been working alongside M with this family...M has been nothing but helpful and always replies to any emails promptly which has made my life so much easier. She is always so friendly, approachable and very professional.*

## Local Government & Social Care Ombudsman cases

The Ombudsman recorded 16 new Children's Social Care referrals during 2020-21. Of the 16 decisions made during this business year, six were upheld.

Ombudsman outcomes	CLOSED			NOT UPHELD		UPHELD				TOTAL	Ongoing
	NFA	No jurisdiction	Premature	NFA	No maladmin'n	NFA	Maladmin & Injustice	Maladmin, no injustice	Already remedied		
Early Intervention & Family Support	0	0	0	0	0	0	0	0	0	0	0
Referral & Assessment	1	1	1	0	1	0	1	0	1	6	1
Safeguarding & Care Planning East	0	1	0	0	0	0	1	0	0	2	0
Safeguarding & Care Planning West	1	1	1	0	0	0	0	0	0	3	0
Children Looked After & Care Leavers	0	0	0	0	0	0	0	0	0	0	0
Fostering Adoption & Resources	1	0	0	0	1	0	3	0	0	5	0
Quality Assurance	0	0	0	0	0	0	0	0	0	0	0
<b>OVERALL</b>	<b>3</b>	<b>3</b>	<b>2</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>5</b>	<b>0</b>	<b>1</b>	<b>16</b>	<b>1</b>

## Financial consequences of complaints

	2018 - 19	2019 - 20	2020 - 21
<b>Ombudsman cases</b>			
Compensation / backdated payments	2,150.00	16,907.52	<b>£800.00</b>
Charges written off	-	-	<b>£0.00</b>
Time & trouble payments	400.00	-	<b>£200.00</b>
<b>Stage 1 complaints</b>			
Compensation / backdated payments	-	-	<b>£0.00</b>
Charges written off	-	-	<b>£0.00</b>
Time & trouble payments	-	-	<b>£0.00</b>
<b>TOTALS</b>	<b>2,550.00</b>	<b>16,907.52</b>	<b>£1,000.00</b>

## 06 | HOUSING

Complaints in relation to Housing are managed through the corporate complaints procedure.

### Housing at a glance

	2018 - 19	2019 - 2020	2020 - 21	% on prev. year
<b>Complaints</b>	118	90	<b>78</b>	-13%
Percentage responded to on time	56%	65%	<b>72%</b>	7%
Percentage fully upheld	27%	18%	<b>24%</b>	6%
Percentage partially upheld	17%	11%	<b>12%</b>	1%
New Ombudsman cases	11	7	<b>6</b>	-14%
Ombudsman cases upheld	5	3	<b>4</b>	33%
Financial consequences	£6,150.00	£8,000.00	<b>£6,500.00</b>	
<b>Compliments</b>	109	284	<b>108</b>	-62%

## Housing Complaints under the Council's Corporate Complaints Procedure

The Housing division was the subject of 78 corporate complaints during 2020/21. 63% of individual complaint aspects were responded to on time, contributing to an overall figure of 72% of complaint responses involving Housing being responded to in a timely way. 36% of complaints were fully or partially upheld, a 7% increase on last year's 29%.

Those 78 complaints gave rise to 81 mentions and 93 individual aspects (please refer to the Terminology section).

The table below sets out the individual complaint aspects for the different services within Housing.

Service	Mentions this year	Aspects this year	Fully upheld	Partially upheld	Not upheld	Ongoing	Answered on time
Housing Allocations	<b>48</b>	<b>57</b>	<b>18</b>	<b>4</b>	<b>34</b>	<b>1</b>	<b>31</b>
%	59%	61%	32%	7%	60%	2%	54%
Housing Options	<b>7</b>	<b>8</b>	<b>2</b>	<b>1</b>	<b>5</b>	<b>0</b>	<b>7</b>
%	9%	9%	25%	13%	63%	0%	88%
Housing Register	<b>5</b>	<b>5</b>	<b>1</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>4</b>
%	6%	5%	20%	0%	80%	0%	80%
Compliance & Development	<b>2</b>	<b>2</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>
%	2%	2%	0%	50%	50%	0%	0%
Management & Acquisitions	<b>19</b>	<b>21</b>	<b>1</b>	<b>5</b>	<b>15</b>	<b>0</b>	<b>17</b>
%	23%	23%	5%	24%	71%	0%	81%
Support & Resettlement	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	0%	0%	0%	0%	0%	0%	0%
<b>OVERALL</b>	<b>81</b>	<b>93</b>	<b>22</b>	<b>11</b>	<b>59</b>	<b>1</b>	<b>59</b>
			24%	12%	63%	1%	63%

## Nature of complaint

The largest number of complaints (26%) were concerns about a lack of action of which 24% were fully upheld, followed by issues with temporary accommodation, of which none were fully upheld and 10% were partially upheld.

Subject	Aspects this year	Fully upheld	Partially upheld	Not upheld	Ongoing	Answered on time
Staff conduct	<b>9</b>	<b>1</b>	<b>1</b>	<b>7</b>	<b>0</b>	<b>8</b>
%	10%	11%	11%	78%	0%	89%
Disputed decision	<b>6</b>	<b>0</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>3</b>
%	6%	0%	0%	100%	0%	50%
Information	<b>4</b>	<b>2</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>2</b>
%	4%	50%	0%	50%	0%	50%
Lack of action	<b>23</b>	<b>5</b>	<b>4</b>	<b>14</b>	<b>0</b>	<b>19</b>
%	25%	22%	17%	61%	0%	83%
Quality of service	<b>27</b>	<b>11</b>	<b>4</b>	<b>12</b>	<b>0</b>	<b>16</b>
%	29%	41%	15%	44%	0%	59%
Service Delay	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
%	0%	0%	0%	0%	0%	0%
Temporary accommodation	<b>24</b>	<b>3</b>	<b>2</b>	<b>18</b>	<b>1</b>	<b>11</b>
%	26%	13%	8%	75%	4%	46%
Behaviour of another service user	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
%	0%	0%	0%	0%	0%	0%
<b>OVERALL</b>	<b>93</b>	<b>22</b>	<b>11</b>	<b>59</b>	<b>1</b>	<b>59</b>
		24%	12%	63%	1%	63%

## Compliments

As much as we like to learn from complaints we like to learn from compliments too. The following are examples of the compliments received by Housing this year :-

Thank you so much for taking the time to read my email, also can you pass my thanks onto B. We really appreciate your fast response so far and help with trying to resolve this issue. This is just an email to say thank you so much for helping us, i cannot explain how much this means to us, and how much happier we will now be.

*You have will and power to help everyone who is in need and I wish you would never lose this dedication. You are an absolute golden star.*

They also did what they said they were going to do, when they said they were going to do it, which in my experience with different local authorities is quite remarkable.

*I understand there are no magic wands amidst the epidemic housing crisis, but it really makes a difference when professionals exhibit positive regard. Being treated as a human being rather than a case number has made a stressful situation a little more bearable.*

You calling me and discussing my concerns made a huge difference, knowing someone could actually listen and have a conversation meant a lot. Thank you very much for assisting us with this. Thank you very much for your continuous support.

*You have helped me, a lot and thank you for that. Really thank you very much. Maybe it's not a big deal for you , but for me it means a change of life.*

I just wanted to say thank you again for taking the time to come to visit my flat. It really helps to know that there are people out there that understand my situation, and do want to help if they can. Thank you for being so polite, professional, friendly and helpful, and for not judging me! It's very much appreciated!

*Thank you for your efforts, these are much appreciated...as were my previous exchanges with you. You have been very patient and understanding with me and this is really appreciated and is an example that others could learn and benefit from... Thank you ever so much again, your efforts have undoubtedly produced this result, very best wishes*

My family and I would like you to know how much we appreciate your kindness, during our period of homelessness. During our hour of need, the kind words and assistance from all, including the security guard, reception staff and the housing solutions team lightened our ordeal.

*S has been very supportive to me with my family. She has pushed me to learn English and many other things. I really appreciate her job. She is one in a million. She helps me to know how to communicate with people. She has supported me through all my difficulties. She is an excellent officer. I don't know how to thank you. Especially for you helping me to write and making me learn for myself. I'm so happy to walk with you thanks for accepting me for who I am.*

## Local Government & Social Care Ombudsman cases

The Ombudsman recorded 12 new Housing referrals during 2020-21. Of the 11 decisions made during the year, 4 were upheld.

Ombudsman outcomes	CLOSED			NOT UPHELD		UPHELD				TOTAL	Ongoing
	NFA	No jurisdiction	Premature	NFA	No maladmin'n	NFA	Maladmin & Injustice	Maladmin, no injustice	Already remedied		
Housing Allocations	1	2	0	0	2	0	0	0	0	5	1
Housing Options	0	0	0	0	1	0	3	0	0	4	0
Housing Register	0	0	0	0	0	0	1	0	0	1	0
Housing Compliance & Strategy	0	0	0	0	0	0	0	0	0	0	0
Housing Management & Acquisitions	1	0	0	0	0	0	0	0	0	1	0
Housing Support & Resettlement	0	0	0	0	0	0	0	0	0	0	0
<b>OVERALL</b>	<b>2</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>11</b>	<b>1</b>

## Financial consequences of complaints

	2018 - 19	2019 - 20	2020 - 21
<b>Ombudsman cases</b>			
Compensation / backdated payments	5,150.00	5,850.00	6,250.00
Charges written off	-	-	-
Time & trouble payments	-	250.00	-
<b>Stage 1 complaints</b>			
Compensation / backdated payments	1,000.00	1300.00	250.00
Charges written off	-	-	-
Time & trouble payments	-	-	-
<b>TOTALS</b>	<b>6,150.00</b>	<b>7,400.00</b>	<b>6,500.00</b>

## 07 | PLANNING & REGENERATION

Complaints in relation to Planning & Regeneration are managed through the corporate complaints procedure. This is the first year that the Customer Engagement & Complaints Service have overseen Planning and Regeneration corporate complaints so no year-on-year comparison data is available.

### Planning & Regeneration at a glance

	2018 - 19	2019 - 2020	2020 - 21	% on prev. year
<b>Complaints</b>	-	-	<b>25</b>	-
Percentage responded to on time	-	-	<b>48%</b>	-
Percentage fully upheld	-	-	<b>15%</b>	-
Percentage partially upheld	-	-	<b>12%</b>	-
New Ombudsman cases	9	13	<b>10</b>	-23%
Ombudsman cases upheld	2	2	<b>1</b>	-50%
Financial consequences	£0.00	£600.00	<b>£0.00</b>	
<b>Compliments</b>	-	n/a	<b>1</b>	-

## Complaints under the Council's Corporate Complaints Procedure

Planning & Regeneration services were the subject of 25 corporate complaints during 2020-21. 39% of individual complaint aspects were responded to on time, contributing to an overall figure of 55% of complaint responses involving Planning & Regeneration being responded to in a timely way. 27% of complaints were fully or partially upheld.

Those 99 complaints gave rise to 25 mentions and 33 individual aspects (please refer to the Terminology section). The table below sets out the individual complaint aspects for the different services within Planning & Regeneration.

Service	Mentions this year	Aspects this year	Fully upheld	Partially upheld	Not upheld	Ongoing	Answered on time
Development Management	11	15	1	2	12	0	8
%	44%	45%	7%	13%	80%	0%	53%
Planning Policy & Strategy	2	2	0	0	2	0	1
%	8%	6%	0%	0%	100%	0%	50%
Building Control	8	8	0	2	6	0	2
%	32%	24%	0%	25%	75%	0%	25%
Facilities & Support	0	0	0	0	0	0	0
%	0%	0%	0%	0%	0%	0%	0%
Property	0	0	0	0	0	0	0
%	0%	0%	0%	0%	0%	0%	0%
Energy	0	0	0	0	0	0	0
%	0%	0%	0%	0%	0%	0%	0%
Libraries	0	0	0	0	0	0	0
%	0%	0%	0%	0%	0%	0%	0%
Town Centre Renewal	2	3	3	0	0	0	1
%	8%	9%	100%	0%	0%	0%	33%
Regeneration	2	5	1	0	4	0	1
%	8%	15%	20%	0%	80%	0%	20%
<b>OVERALL</b>	<b>25</b>	<b>33</b>	<b>5</b>	<b>4</b>	<b>24</b>	<b>0</b>	<b>13</b>
			15%	12%	73%	0%	39%

## Nature of complaint

The largest number of complaints (27% each) were concerns about quality of service and information issues. For both aspects, 33% were at least partly upheld.

Subject	Aspects this year	Fully upheld	Partially upheld	Not upheld	Ongoing	Answered on time
Staff conduct	2	0	0	2	0	0
%	6%	0%	0%	100%	0%	0%
Disputed decision	8	0	0	8	0	5
%	24%	0%	0%	100%	0%	63%
Information	9	3	0	6	0	3
%	27%	33%	0%	67%	0%	33%
Lack of action	4	0	2	2	0	1
%	12%	0%	50%	50%	0%	25%
Quality of service	9	2	1	6	0	3
%	27%	22%	11%	67%	0%	33%
Service Delay	1	0	1	0	0	1
%	3%	0%	100%	0%	0%	100%
Behaviour of another service user	0	0	0	0	0	0
%	0%	0%	0%	0%	0%	0%
<b>OVERALL</b>	<b>33</b>	<b>5</b>	<b>4</b>	<b>24</b>	<b>0</b>	<b>13</b>
		15%	12%	73%	0%	39%

## Compliments

As much as we like to learn from complaints we like to learn from compliments too. The following are examples of the compliments received by Housing this year :-

(1) Speed of resolving the issue - delays in printing notices/acknowledgement letters - I was very surprised by how quickly the printing letters was addressed. Today, I received a letter within 3 working days which is a dramatic improvement...(2) Also, I want to compliment A for the speed of uploading my application on the Planning Portal, speed addressing my concern about my correspondence being added and for his polite communication, which was very professional, friendly and polite. (3) Also, I also want to compliment J for listening to my concerns, acknowledging the opportunity to still send in our representation and signposting me to raise my concerns about postal delays of notices.

## Local Government & Social Care Ombudsman cases

The Ombudsman recorded 11 new Planning & Regeneration referrals during 2020-21. Of the 11 decisions made during the year, one was upheld.

Ombudsman outcomes	CLOSED			NOT UPHELD		UPHELD				TOTAL	Ongoing
	NFA	No jurisdiction	Premature	NFA	No maladmin'h	NFA	Maladmin & Injustice	Maladmin, no injustice	Already remedied		
Development Management	4	0	0	0	1	0	1	0	0	6	1
Planning Policy & Strategy	0	0	0	0	0	0	0	0	0	0	0
Building Control	2	1	0	0	1	0	0	0	0	4	0
Facilities & Support	0	0	0	0	0	0	0	0	0	0	0
Property	0	0	0	0	0	0	0	0	0	0	0
Energy	0	0	0	0	0	0	0	0	0	0	0
Libraries	0	0	0	0	0	0	0	0	0	0	0
Town Centre Renewal	0	0	0	0	0	0	0	0	0	0	0
Regeneration	0	0	1	0	0	0	0	0	0	1	1
<b>OVERALL</b>	<b>6</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>11</b>	<b>2</b>

## Financial consequences of complaints

	2018 - 19	2019 - 20	2020 - 21
<b>Ombudsman cases</b>			
Compensation / backdated payments	-	300.00	-
Charges written off	-	-	-
Time & trouble payments	-	300.00	-
<b>Stage 1 complaints</b>			
Compensation / backdated payments	N/K	N/K	-
Charges written off	N/K	N/K	-
Time & trouble payments	N/K	N/K	-
<b>TOTALS</b>	<b>0.00</b>	<b>600.00</b>	<b>0.00</b>

## 08 | EDUCATION

Complaints in relation to Education services are managed through the corporate complaints procedure.

### At a glance

	2018 - 19	2019 - 2020	2020 - 21	% on prev. year
<b>Complaints</b>	45	38	<b>23</b>	-39%
Percentage responded to on time	44%	51%	<b>48%</b>	-3%
Percentage fully upheld	51%	23%	<b>15%</b>	-8%
Percentage partially upheld	9%	35%	<b>24%</b>	-11%
New Ombudsman cases	7	8	<b>4</b>	-50%
Ombudsman cases upheld	4	4	<b>5</b>	25%
Financial consequences	£10,604.60	£5,932.00	<b>£0.00</b>	
<b>Compliments</b>	2	4	<b>22</b>	450%

## Complaints under the Council's Corporate Complaints Procedure

The Education division was the subject of 23 corporate complaints during 2020-21. 61% of individual complaint aspects were responded to on time, contributing to an overall figure of 48% of complaint responses involving Education being responded to in a timely way. 39% of complaints were fully or partially upheld, a 16% decrease on last year's 55%.

Those 23 complaints gave rise to 23 mentions and 33 individual aspects (please refer to the Terminology section ).

The table below sets out the individual complaint aspects for the different services within Education.

Service	Mentions this year	Aspects this year	Fully upheld	Partially upheld	Not upheld	Ongoing	Answered on time
Admissions	6	8	1	0	7	0	4
%	26%	24%	13%	0%	88%	0%	50%
Early Years	1	1	0	0	1	0	1
%	4%	3%	0%	0%	100%	0%	100%
Education Welfare	3	4	1	0	3	0	2
%	13%	12%	25%	0%	75%	0%	50%
SEN	8	12	1	5	6	0	7
%	35%	36%	8%	42%	50%	0%	58%
SEN Transport	5	8	2	3	3	0	6
%	22%	24%	25%	38%	38%	0%	75%
<b>OVERALL</b>	<b>23</b>	<b>33</b>	<b>5</b>	<b>8</b>	<b>20</b>	<b>0</b>	<b>20</b>
			15%	24%	61%	0%	61%

## Nature of complaint

The most prevalent complaints (27%) were in relation to information issues a lack of action of which 11% were partly upheld.

Subject	Aspects this year	Fully upheld	Partially upheld	Not upheld	Ongoing	Answered on time
Staff conduct	<b>5</b>	<b>2</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>4</b>
%	15%	40%	0%	60%	0%	80%
Disputed decision	<b>3</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>0</b>	<b>2</b>
%	9%	0%	33%	67%	0%	67%
Information	<b>9</b>	<b>0</b>	<b>1</b>	<b>8</b>	<b>0</b>	<b>5</b>
%	27%	0%	11%	89%	0%	56%
Lack of action	<b>7</b>	<b>1</b>	<b>2</b>	<b>4</b>	<b>0</b>	<b>5</b>
%	21%	14%	29%	57%	0%	71%
Quality of service	<b>7</b>	<b>1</b>	<b>4</b>	<b>2</b>	<b>0</b>	<b>3</b>
%	21%	14%	57%	29%	0%	43%
Service Delay	<b>2</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>
%	6%	50%	0%	50%	0%	50%
Behaviour of another service user	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
%	0%	0%	0%	0%	0%	0%
<b>OVERALL</b>	<b>33</b>	<b>5</b>	<b>8</b>	<b>20</b>	<b>0</b>	<b>20</b>
		15%	24%	61%	0%	61%

## Compliments

As much as we like to learn from complaints we like to learn from compliments too. The following are examples of the compliments received by Education this year :-

Thank you so much for all your help in the EHCP process, the meeting we had and your help in securing him a place.... It has all been amazing and we are so thrilled for L to be having this amazing and supportive experience of school. With ours, his and everyone else's hard work and patience our hearts are all mending and life can move forward now.

*Thank you so much for being so readily available, and for making such a new and overwhelming experience lighter for us all. You have been wonderful and a breath of fresh air*

I wanted to thank you both for all your support for Z during what has been, and unfortunately continues to be, a very difficult year for him. As Z has had his first half term I just thought you would like to know that he appears to be happy, making friends and settling in well. Again I cannot thank you all enough for always having Z's best interests at heart and very much appreciate the security you have put in place for him.

*The support that we received from E in this situation cannot be praised more highly.... She was always at the end of the phone, was supportive but challenged us where needed, reassured me when there was physically nothing more I could do to make the situation better. I feel lucky that I made that referral as I worry what would have become of all of us in that situation if we hadn't. I don't have pupils or families who need that level of support (or cause me to need it!) at the moment but it is great to know it is there if I should and I am pleased that my colleagues who do need it right now are able to access it... E was amazing- I know to her it may not have seemed much but to me it was a life line*

Thank you so much V you have been excellent. I would like to thank you for your prompt responses and your professionalism that has always put K at the centre of everything.

*Thanks a lot for your time. It was really helpful, it is always a pleasure to talk to a professional.*

We are truly grateful for all you have done for M and for us. We are very pleased about M attending (school) and truly appreciate all your help and support.

*Just to let you know I have had positive feedback from the TAs about the new PA... One of the TAs has been giving her copies of some basic signs, including some that the pupils are learning. She is also making some visual resources to support playing some simple games e.g. how many red cars can you see? The PA had taken the initiative to look up some signs on the internet and had asked us for more. Thank you for this. It will really have a positive impact on our pupils, they should arrive happy and ready to learn.*

## Local Government & Social Care Ombudsman cases

The Ombudsman recorded 8 new Planning & Regeneration referrals during 2020-21. Of the 7 decisions made during the business year, 5 were upheld.

Ombudsman outcomes	CLOSED			NOT UPHELD		UPHELD				TOTAL	Ongoing
	NFA	No jurisdiction	Premature	NFA	No maladminin	NFA	Maladmin & Injustice	Maladmin, no injustice	Already remedied		
Admissions	0	0	0	0	0	0	0	0	0	0	0
Early Years	0	0	0	0	0	0	0	0	0	0	0
Education Welfare	0	0	0	0	0	0	0	0	0	0	0
SEN	1	1	0	0	0	0	3	0	1	6	1
SEN Transport	0	0	0	0	0	0	1	0	0	1	0
<b>OVERALL</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>1</b>	<b>7</b>	<b>1</b>

## Financial consequences of complaints

	2018 - 19	2019 - 20	2020 - 21
<b>Ombudsman cases</b>			
Compensation / backdated payments	10,204.60	5,632.00	<b>1,400.00</b>
Charges written off	-	-	-
Time & trouble payments	400.00	300.00	<b>200.00</b>
<b>Stage 1 complaints</b>			
Compensation / backdated payments	-	-	<b>2,700.00</b>
Charges written off	-	-	-
Time & trouble payments	-	-	-
<b>TOTALS</b>	<b>10,604.60</b>	<b>5,932.00</b>	<b>4,300.00</b>

## 09 | CHIEF EXECUTIVE'S DEPARTMENT

Complaints in relation to the Chief Executive's Department are managed through the corporate complaints procedure. This division covers areas such as Finance, Legal, Electoral and Registrar services.

### At a glance

	2018 - 19	2019 - 2020	2020 - 21	% on prev. year
<b>Complaints</b>	66	95	<b>75</b>	-21%
Percentage responded to on time	70%	59%	<b>52%</b>	-7%
Percentage fully upheld	27%	25%	<b>39%</b>	14%
Percentage partially upheld	23%	17%	<b>10%</b>	-7%
New Ombudsman cases	23	20	<b>9</b>	-55%
Ombudsman cases upheld	4	3	<b>2</b>	-33%
Financial consequences	£1,253.00	£1,454.39	<b>£0.00</b>	
<b>Compliments</b>	-	-	<b>12</b>	-

### Complaints under the Council's Corporate Complaints Procedure

The Chief Executive's Department was the subject of 75 complaints during 2020-21. 61% of individual complaint aspects were responded to on time, contributing to an overall figure of 52% of complaint responses involving the department being responded to in a timely way. 49% of complaints were fully or partially upheld, a 7% decrease on last year's 56%.

Those 75 complaints gave rise to 78 mentions and 97 individual aspects (please refer to the Terminology section).

The table below sets out the individual complaint aspects for the different services within the Chief Executive's Department.

Service	Mentions this year	Aspects this year	Fully upheld	Partially upheld	Not upheld	Ongoing	Answered on time
Electoral Services	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>
%	1%	1%	0%	0%	100%	0%	100%
Registrar Services	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
%	0%	0%	0%	0%	0%	0%	0%
Democratic Services	<b>1</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>
%	1%	1%	100%	0%	0%	0%	100%
Customer Services	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
%	0%	0%	0%	0%	0%	0%	0%
Communications	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
%	0%	0%	0%	0%	0%	0%	0%
Information Management	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
%	0%	0%	0%	0%	0%	0%	0%
Appointeeship	<b>4</b>	<b>5</b>	<b>0</b>	<b>2</b>	<b>3</b>	<b>0</b>	<b>2</b>
%	5%	5%	0%	40%	60%	0%	40%
Business Rates	<b>2</b>	<b>3</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>
%	3%	3%	100%	0%	0%	0%	67%
Care Home Fees	<b>13</b>	<b>19</b>	<b>7</b>	<b>3</b>	<b>9</b>	<b>0</b>	<b>9</b>
%	17%	20%	37%	16%	47%	0%	47%
Council Tax	<b>10</b>	<b>13</b>	<b>5</b>	<b>1</b>	<b>7</b>	<b>0</b>	<b>11</b>
%	13%	13%	38%	8%	54%	0%	85%
Direct Payments	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>
%	1%	1%	0%	0%	0%	100%	0%
Domiciliary Care fees	<b>24</b>	<b>30</b>	<b>11</b>	<b>3</b>	<b>14</b>	<b>2</b>	<b>16</b>
%	31%	31%	37%	10%	47%	7%	53%
Housing Benefit	<b>12</b>	<b>12</b>	<b>5</b>	<b>0</b>	<b>7</b>	<b>0</b>	<b>9</b>
%	15%	12%	42%	0%	58%	0%	75%
Income & Recovery	<b>7</b>	<b>8</b>	<b>4</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>6</b>
%	9%	8%	50%	0%	50%	0%	75%
Freedom Pass	<b>2</b>	<b>3</b>	<b>2</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>
%	3%	3%	67%	0%	33%	0%	33%
Legal	<b>1</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>
%	1%	1%	0%	100%	0%	0%	100%
<b>OVERALL</b>	<b>78</b>	<b>97</b>	<b>38</b>	<b>10</b>	<b>46</b>	<b>3</b>	<b>59</b>
			39%	10%	47%	3%	61%

## Nature of complaint

The majority of complaints were in relation to billing and charging issues (40%), of which 33% were fully upheld and 15% partially upheld.

Subject	Aspects this year	Fully upheld	Partially upheld	Not upheld	Ongoing	Answered on time
Staff conduct	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>
%	1%	0%	0%	100%	0%	100%
Disputed decision	<b>4</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>3</b>
%	4%	0%	0%	100%	0%	75%
Information	<b>7</b>	<b>3</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>3</b>
%	7%	43%	14%	29%	14%	43%
Lack of action	<b>14</b>	<b>5</b>	<b>1</b>	<b>8</b>	<b>0</b>	<b>11</b>
%	14%	36%	7%	57%	0%	79%
Quality of service	<b>28</b>	<b>15</b>	<b>1</b>	<b>12</b>	<b>0</b>	<b>18</b>
%	29%	54%	4%	43%	0%	64%
Service Delay	<b>4</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>3</b>
%	4%	50%	25%	25%	0%	75%
Billing & Charging	<b>39</b>	<b>13</b>	<b>6</b>	<b>18</b>	<b>2</b>	<b>20</b>
%	40%	33%	15%	46%	5%	51%
<b>OVERALL</b>	<b>97</b>	<b>38</b>	<b>10</b>	<b>46</b>	<b>3</b>	<b>59</b>
		39%	10%	47%	3%	61%

## Compliments

As much as we like to learn from complaints, we like to learn from compliments too. The following are examples of those received this year :-

I would like to take the opportunity of thanking the London Borough of Bromley for all the financial help they give my wife...without the help of the Council I would not be able to manage so I just want to say a big Thank You.

*I would like to bring to your attention outstanding experience from one of your staff dealing with Council Tax. Her name is T, she handled my query very professionally, explained everything, answered all my questions and having consulted her manager came back to me with the answer within half an hour. I can't praise her enough, especially that we are both elderly and vulnerable people.*

I am just writing to say that M has been super helpful and kept me updated even with my constant emails asking the same questions over and over again. I imagine during these times it has not been easy for you all especially with all this disruption and extra work load. I just wanted to mention his name as he has been so helpful and I thank him so much.

*All of the people we dealt with were brilliant and never before in my life have I dealt with an organisation where everything went so smoothly. Your staff are an absolute credit to you and we would just like to give you our warmest heartfelt thanks for everything you made possible for us in such trying times.*

I'd like to thank you and the staff of the Registrar's office for your help in making the day that A became a citizen of the UK a special one. At a time when life is presenting us with problems and obstacles you went out of your way to provide solutions and I appreciate that.

*S was very professional. She explained to me the next steps and was very patient with me. I found her incredibly helpful, warm and understanding...Could you please pass this message to her and recognise her - there's not many people who would go out of their way as much as she did for me.*

Your staff have been amazing as our original booking was cancelled due to the covid outbreak. We were kept well informed throughout and were extremely happy we could finally go ahead with our special day. The restrictions did not affect our ceremony because M & S made everything feel so special. We thank you all.

*I realise that life as a Civil Servant is largely unsung and appreciation for your efforts is normally categorised as 'being part of the job'. I thought I would buck the trend and drop you a line to say thanks to you for your efforts both by phone and email in digging out the relevant entry. You were helpful and cheery which in these troubled times made a refreshing change.*

## Local Government & Social Care Ombudsman cases

The Ombudsman recorded 11 new referrals concerning the Chief Executive's Department during 2020-21. Of the 9 decisions made during the year, 2 were upheld.

Ombudsman outcomes	CLOSED			NOT UPHELD		UPHELD				TOTAL	Ongoing
	NFA	No jurisdiction	Premature	NFA	No maladmin'n	NFA	Maladmin & Injustice	Maladmin, no injustice	Already remedied		
Electoral Services	0	0	0	0	0	0	0	0	0	0	0
Registrar Services	0	0	0	0	0	0	0	0	0	0	0
Democratic Services	0	1	0	0	1	0	0	0	0	2	0
Customer Services	0	0	0	0	0	0	0	0	0	0	0
Communications	0	0	0	0	0	0	1	0	0	1	0
Information Management	0	1	0	0	0	0	0	0	0	1	0
Appointeeship	0	0	0	0	0	0	0	0	0	0	0
Business Rates	0	0	0	0	0	0	0	0	0	0	0
Care Home Fees	1	0	0	0	0	0	0	0	0	1	0
Council Tax	1	0	1	0	0	0	0	0	0	2	1
Direct Payments	0	0	0	0	0	0	0	0	0	0	0
Domiciliary Care fees	0	0	0	0	0	0	0	0	1	1	0
Housing Benefit	0	0	0	0	1	0	0	0	0	1	0
Appointeeship	0	0	0	0	0	0	0	0	0	0	0
Freedom Pass	0	0	0	0	0	0	0	0	0	0	0
Legal	0	0	0	0	0	0	0	0	0	0	0
<b>OVERALL</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>9</b>	<b>1</b>

## Financial consequences of complaints

	2018 - 19	2019 - 20	2020 - 21
<b>Ombudsman cases</b>			
Compensation / backdated payments	-	600.00	-
Charges written off	-	281.39	-
Time & trouble payments	-	250.00	-
<b>Stage 1 complaints</b>			
Compensation / backdated payments	250.00	100.00	<b>121.00</b>
Charges written off	510.30	223.00	-
Time & trouble payments	-	0.00	-
<b>TOTALS</b>	<b>760.30</b>	<b>1,454.39</b>	<b>121.00</b>

## 10 | ENVIRONMENT & PUBLIC PROTECTION

### Complaints under the Council's Corporate Complaints Procedure

Environment & Public Protection recorded 207 cases as having been handled as corporate complaints during 2020-21.

Service	2018 -19	2019 - 20	2020 – 21	%age
Highways & Transport	52	22	<b>19</b>	-14%
Neighbourhood Management	164	134	<b>158</b>	+13%
Public Protection	45	21	<b>10</b>	-52%
Traffic, Road Safety & Parking	84	34	<b>26</b>	-24%
<b>OVERALL</b>	<b>384</b>	<b>211</b>	<b>207</b>	<b>-0.02%</b>

### Nature of complaint

Environment & Public Protection currently allocate their complaints to one of four categories.

Service	On time	Information	Lack of action	Operational	Staff conduct	Policy	TOTAL	2019-20
Highways & Transport	100%	0	4	10	1	4	<b>19</b>	22
Neighbourhood Management	98.5%	13	27	84	16	12	<b>152</b>	134
Public Protection	100%	0	3	4	1	2	<b>10</b>	21
Traffic, Road Safety & Parking	100%	0	4	15	0	7	<b>26</b>	34
<b>OVERALL</b>	<b>99.6%</b>	<b>13</b>	<b>38</b>	<b>113</b>	<b>18</b>	<b>25</b>	<b>207</b>	<b>211</b>

## Compliments

As much as we like to learn from complaints, we like to learn from compliments too. The following are examples of those received by Environment & Public Protection this year :-

Being a women I am always a little apprehensive about visiting the dump, knowing where to park, what to put where etc. However today I visited Churchfields and the men there were very helpful, jolly, polite and were keeping it tidy and organised. A far more pleasant experience than I was expecting.

*Please can you pass on my thanks to the team who came to clear up the mess left by the tree that fell in Park Road, Beckenham on 25th September. They turned up promptly on the day it happened, made the area safe and look to have completed the job leaving the area safe and tidy today. This is not the first time this year that the team have had to clear away a fallen tree in Park Road and they did a great job then, too.*

I am writing to express my gratitude to one of the officers in the Bromley Council who has been very professional in helping me in a recent noise nuisance caused by a neighbour. I am not sure how this will evolve however the officer has demonstrated an excellent level of duty of care and diligent in carrying out his role and responsibilities. I found him easy to approach and a reliable officer to liaise with. If there are more members of staff like him in all councils and corporates, it will be beneficial to our society.

*Just to thank you for your very prompt service following my call to check on my missed food waste collection. Within approx. 30 minutes the container had been emptied with amazing speed and efficiently. Well Done & many thanks.*

We – that’s myself and my wife - would like to thank all that were involved on the prompt action you gave us on removing the graffiti from the pavement outside our bungalow. Thank you from both of us.

*I would like to thank the street lighting division that so promptly fitted a shield to the street light directly opposite my home. It has greatly reduced the glare into my home which I am extremely grateful for. Please pass this message to the appropriate team. Again many thanks to LBB.*

## Local Government & Social Care Ombudsman cases

The Ombudsman recorded 17 referrals during 2020-21. Of the 19 decisions made during the year, just 1 was upheld and that required no remedial work.

Ombudsman outcomes	CLOSED			NOT UPHELD		UPHELD				TOTAL	Ongoing
	NFA	No jurisdiction	Premature	NFA	No maladmin'n	NFA	Maladmin & Injustice	Maladmin, no injustice	Already remedied		
Highways & Transport	4	6	2	0	1	0	0	0	0	13	0
Neighbourhood Management	1	0	1	0	2	1	0	0	0	5	0
Public Protection	1	0	0	0	0	0	0	0	0	1	0
Renewal & Recreation	0	0	0	0	0	0	0	0	0	0	0
<b>OVERALL</b>	<b>6</b>	<b>6</b>	<b>3</b>	<b>0</b>	<b>3</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>19</b>	<b>0</b>

## Financial consequences of complaints

	2018 - 19	2019 - 20	2020 - 21
<b>Ombudsman cases</b>			
Compensation / backdated payments	-	300.00	-
Charges written off	-	-	-
Time & trouble payments	-	180.00	-
<b>Stage 1 complaints</b>			
Compensation / backdated payments	N/K	N/K	-
Charges written off	N/K	N/K	-
Time & trouble payments	N/K	N/K	-
<b>TOTALS</b>	<b>0.00</b>	<b>480.00</b>	<b>0.00</b>

## 11 | PUBLIC HEALTH

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The Council received no complaints relating to its Public Health responsibilities this year.



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Report No.  
ES20119

London Borough of Bromley

PART ONE - PUBLIC

**Decision Maker:** GENERAL PURPOSES AND LICENSING COMMITTEE

**Date:** 21<sup>th</sup> September 2021

**Decision Type:** Non-Urgent                      Non-Executive                      Key

**Title:** LICENSING ACT 2003 – AMMENDMENT TO THE STATEMENT OF LICENSING POLICY FOR 2021 TO 2026. CUMULATIVE IMPACT ASSESSMENT.

**Contact Officer:** Steve Phillips, Health Safety and Licensing Manager  
Tel: 020 8313 4659    E-mail: steve.phillips@bromley.gov.uk

**Chief Officer:** Colin Brand Director: Environment and Public Protection

**Ward:** All Wards

1. Reason for report

- 1.1 Section 5 of the Licensing Act 2003 requires a licensing authority to prepare and publish a statement of its licensing policy (SLP) at least every five years. During the five-year period, the policy must be kept under review and the licensing authority may make any revisions to it as it considers appropriate.
- 1.2 The draft SLP for Bromley Council was duly consulted on, and became effective on 7th January 2021, and will expire in January 2026. The SLP contains a Cumulative Impact Policy (CIP) that covers two areas, these being Beckenham and Bromley Town Centres. Government legislation in the form of the Policing and Crime Act 2017 changed, it now requires a Cumulative Impact Assessment (CIA) to be carried out to support any CIP that is contained within a Licensing Authority’s SLP.
- 1.3 On 30<sup>th</sup> Sept 2020 the General Purposes and Licencing Committee (GP&LC) approved the Licensing Policy and with the CIPs in place and the CIA for consultation, to ascertain whether the evidence supported the retention, extension and or removal of the CIP within the SLP. This report outlines the response to the consultation on the draft CIA (Appendix A).

## 2. RECOMMENDATIONS

### That the Committee

- 2.1 Consider the evidence received during the consultation
- 2.2 Approve the CIA, and retain the CIP for Beckenham and Bromley Town Centres within the Councils SLP 2021 to 2026 (option A section 3.10).
- 2.3 Authorise Officers to update the SLP accordingly.
- 2.4 Recommendation to Full Council of the decision taken by GP&L Committee

### Impact on Vulnerable Adults and Children

1. Summary of Impact: This CIA is required to be undertaken to support any CIP in place within the borough boundaries. The Licensing Policy is required to be in place under the Licensing Act 2003. Within the Licensing Act 2003 it requires under section 4(2) specifically to promote 4 licensing objectives, one of which is the protection of children from harm.

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### Corporate Policy

1. Policy Status: Existing Policy:

The Council has adopted a statement of its licensing policy under the Licensing Act 2003 for the period 2021 to 2026, which remains valid until 7<sup>th</sup> January 2026

2. BBB Priority: Children and Young People Excellent Council Quality Environment Safe Bromley Vibrant, Thriving Town Centres Healthy Bromley Regeneration

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### Financial

1. Cost of proposal: No Cost
2. Ongoing costs: Non-Recurring Cost
3. Budget head/performance centre: Public Protection & Enforcement Portfolio Budget
4. Total current budget for this head: £
5. Source of funding: Revenue Budget

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### Personnel

1. Number of staff (current and additional): 1 Licensing Officer supported by 3.5 FTE admin support
2. If from existing staff resources, number of staff hours: Not applicable

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### Legal

1. Legal Requirement: Statutory Requirement: Section 5 (as amended) of the Licensing Act 2003 requires the Council as the Licensing Authority to determine and publish its policy every 5 years. Section 182 Guidance issued under the Licensing Act 2003 (revised 2018) requires the Licensing Authority at section 14.24 to consider publishing its CIA to support the CIP in place. Consultation was undertaken in accordance with section 5 of the Licensing Act 2003.
  2. Call-in: N/A
- 

#### Procurement

1. Summary of Procurement Implications: Not applicable
- 

#### Customer Impact

1. Estimated number of users/beneficiaries (current and projected): All businesses and organisations with the London Borough of Bromley that hold Licenses issued under the Licensing Act 2003, their customers and residents who live in close proximity.
- 

#### Ward Councillor Views

2. Have Ward Councillors been asked for comments? YES. All Ward Members were notified and asked to comment on the policy prior to its adoption on 20<sup>th</sup> October 2021.

### **3. COMMENTARY**

- 3.1 Bromley Council has included a special policy of Cumulative Impact (CIP) within its Statement of Licensing Policy (SLP) since 2003, that covers 2 areas, these being Beckenham and Bromley Town Centres.
- 3.2 These were introduced following evidence provided by the Metropolitan Police, which demonstrated that were adversely affected by an increase in crime, disorder and antisocial behaviour due to a large number of licensed premises being concentrated within these areas.
- 3.3 Cumulative impact is the potential impact that a significant number of licensed premises concentrated in one area, can have on the promotion of the licensing objectives. Where an application is made for a licensed premises within an area covered by a CIP, and the application is subject to representations, then it is the policy of the Council to refuse a licence where it determines that by granting the application it would contribute to the cumulative impact on the area. Licensed premises are any premises authorised by a Premises licence or Club Premises Certificate to carry on any licensable activity, including the sale of alcohol for consumption on and off the premises, and the provision of late-night refreshment.
- 3.4 A CIP is not a means of automatic refusal to grant or vary a licence. When an application for a new license (or a variation) is received for a premises that is located within an area covered by a CIP, and if a valid representation is received, it then becomes the applicant's responsibility to prove how their application for a new or varied licence will not adversely impact on the licensing objectives in respect of the Night Time Economy cover by the CIP's. As such, there is

a rebuttable presumption that any new applications, or applications to substantially alter existing permissions, will be refused unless the applicant can demonstrate to the Authority that the proposals will not add to the existing problems in the area

- 3.5 The existing Cumulative Impact areas are detailed at Appendix A
- 3.6 The introduction of the Cumulative Impact Assessment (CIA) was formally added to the Licensing Act 2003 (LA2003) by the Policing and Crime Act 2017 (PACA2017), with effect from 6 April 2018. Due to this recent amendment to the LA2003 Act, the Council, as the Licensing Authority, must look to review the CIA Policy every 3 years to ensure all evidence is relevant to the current issues.
- 3.7 Whilst the data available supported the retention of the CIP at the time of the review of the SLP, the formal production of the CIA was delayed as result of the Covid Pandemic, as officers who ordinarily would undertake this work, were redeployed to deliver to COVID enforcement functions. The CIA has now been completed, and this report presents the results, which formally support the decision of full Council taken on 20th October 2020 to adopt the current SLP 2021 to 2026, which included a CIP covering Beckenham and Bromley Town Centres.

#### Consultation of the Assessment

- 3.8 In preparing this CIA, consultation took place between October 2020 and April 2021; consideration of the retention of the existing CIP areas formed a part of the consultation on the wider policy and respondents were asked specifically whether the Cumulative Impact Area should remain, be expanded, contracted or removed. As part of the consultation, the Council is required by the LA2003 to consult the following groups of people:

- Representatives of local business
- Local residents and their representatives
- Representatives of local Premises Licence holders
- Representatives of local Club Certificate holders
- Representatives of local Personal Licence holders
- Local licensing solicitors
- Charitable organisations that deal with the social impact of alcohol misuse
- The Responsible Authorities namely:
  - Metropolitan Police
  - London Fire Brigade
  - Environmental Health
  - Health & Safety
  - Safeguarding Children & Adults
  - Planning
  - Director of Public Health
  - Trading Standards
  - Home Office (Immigration Services)

#### Consultation Outcome

- 3.9 There were no responses relating to the CIPs in place. The responsible authorities, who supplied data in the production of this assessment were all in favour of retaining the existing Cumulative Impact Areas. As such, no amendments to the CIP were made. (See Appendix A Executive Summary)

#### Options

- 3.10 The Licensing Authority is required to consider the evidence received during the consultation and reach its determination. After considering the evidence, the Authority may determine to
- A. Keep existing Cumulative Impact Areas without the need for amendment.
  - B. Increase an existing Cumulative Impact Area or create a new one based on the evidence and define the location accordingly
  - C. Reduce an existing Cumulative Impact Area and specify which streets are no longer subject to cumulative impact and the reasons why
  - D. Determine that an entire Cumulative Impact Area is no longer required and provide reasons for this opinion.

Chosen Open

- 3.11 As all responses supported the retention of the CIP without any extension, the preferred option is 'A'.

Next Steps

- 3.12 The Decision of GP&L to support the recommendation at "A" would then be passed to Full Council to agree the amendment of the current Licensing Policy to include this CIA.

#### **4 IMPACT ON VULNERABLE ADULTS AND CHILDREN**

- 4.1 The Licensing regime provides for additional controls through specific permissions to undertake activities. Both the Licensing Act 2003 and Gambling Act 2005 contain licensing objectives which seek to protect particular vulnerable groups. In the case of the Licensing Act 2003, there is a specific licensing objective that seeks to protect children from harm whereas the licensing objectives under the Gambling Act 2005 are wider and seek to protect children and vulnerable adults from being harmed or exploited.
- 4.2 Businesses and the Council are required to promote these objectives in the way they operate or make decisions.
- 4.3 Details of applications under both Acts are referred to the appropriate safeguarding teams for comment.

#### **5 POLICY IMPLICATIONS**

- 5.1 Both the Licensing Act 2003 and the Gambling Act 2005 require the Council to prepare, consult on and publish statements of their licensing policy. These must be reviewed at least every 5 years under the Licensing Act and 3 years under the Gambling Act.
- 5.2 Members should make decisions in accordance with these policies but are free to depart from them with good reason.

#### **6 FINANCIAL & LEGAL IMPLICATIONS**

- 6.1 The Council is required to prepare and publish a statement of its Licensing Policy for a period of 5 years This was completed and agreed on the 12<sup>th</sup> October 202 and became effective from 7<sup>th</sup> January 2021 to 7<sup>th</sup> January 2026.

<b>Non-Applicable Sections:</b>	Personnel and Procurement implications
Background Documents: (Access via Contact Officer)	Soft File Computer based records

## Appendix A

### Cumulative Impact Assessment

# London Borough of Bromley

## Statement of Licensing Policy 2021-26

### *Cumulative Impact Assessment*

## Contents

1	Executive Summary	10
2	Background	13
2.1	What is cumulative impact? .....	<b>Error! Bookmark not defined.</b>
2.2	What is a cumulative impact assessment?.....	<b>Error! Bookmark not defined.</b>
3	Methodology	14
4	Findings: Licensed premises data	16
4.1	Background.....	16
4.2	Findings.....	16
4.3	Comparative premises density .....	19
5	Findings: Observational fieldwork	20
5.1	Background.....	20
5.2	Observations - Beckenham .....	20
5.3	Observations - Bromley .....	23
6	Findings: Crime & disorder and public nuisance	26
6.1	Background.....	26
6.2	SafeStats data .....	26
6.3	Alcohol related violent crime.....	31
7	Findings: CCTV data	33
8	Findings: London Ambulance Service	37
8.1	Background.....	37
8.2	Ambulance assault callouts .....	37
9	Findings: Noise nuisance	39
10	Findings: Residents' survey	42
10.1	Background.....	42
10.2	Findings – Most serious crimes.....	43
10.3	Findings – Anti-social behaviour .....	43
10.4	Findings – Drug use.....	44
10.5	Findings – Alcohol misuse .....	45
10.6	Findings – Feelings of safety .....	45
11	Findings: Public health	47
11.1	Context.....	47
11.2	Background.....	47
11.3	Bromley Primary Care analysis .....	47
11.4	Harmful drinking .....	49

## 1 Executive Summary

## 2 Background

1. This cumulative impact assessment (CIA) was undertaken alongside the London Borough of Bromley's *Statement of Licensing Policy 2021-2026*.
2. Cumulative impact is a proper matter that a licensing authority (Bromley Council in this case) can consider under the *Licensing Act 2003* and its accompanying *Guidance (Section 182, revised 2018)*. Cumulative impact is best summarised as
 

*An area where a concentration of licensed premises, however small in number or well managed individually, causes problems or 'cumulative impact' beyond their immediate premises. In doing so, their impact must compromise one or more of the four licensing objectives, which are: the prevention of crime and disorder, public safety, the prevention of nuisance and the protection of children from harm.*
3. Under the Policing and Crime Act 2017, cumulative impact policies were put on a statutory footing (not simply as a reference in the S182 Guidance) and the duty to undertake a cumulative impact assessment made a legal requirement should a licensing authority seek to introduce or retain a cumulative impact policy.

## 3 Findings – Licensed premises

4. There are 901 licensed premises in the borough. Of these, a disproportionately large amount, 97 and 64 respectively, are located in the Bromley and Beckenham CIP areas.
5. The borough is approximately 152km<sup>2</sup> in size. The Bromley CIP area is approximately 0.6km<sup>2</sup> and the Beckenham CIP area is approximately 0.2km<sup>2</sup>. This means the average density of licences is 5 per km<sup>2</sup> across the borough. In Bromley CIP area the density is 159 per km<sup>2</sup>. and in Beckenham it is 305 per km<sup>2</sup>. There is significant accumulation of premises in these two CIP areas.

## 4 Findings – Crime & disorder and public nuisance

6. Overall, crime and disorder and public nuisance recorded on the Metropolitan Police recording system are much higher in the two town wards (*Bromley Town* and *Copers Cope* in Beckenham) which contain the two CIP areas than the borough average.
7. **Serious violent and sexual crimes** are, respectively, 4x and 2x higher per km<sup>2</sup> in Bromley and Beckenham town centre wards than the borough average.
8. Recorded **drugs crimes** are, respectively, 10x and 2x higher per km<sup>2</sup> in Bromley and Beckenham town centre wards than the borough average.
9. Recorded **robberies** are, respectively, up to 12x and 3x higher per km<sup>2</sup> in Bromley and Beckenham town centre wards than the borough average.
10. Recorded **theft from the person** are, respectively, up to 24x and 3x higher per km<sup>2</sup> in Bromley and Beckenham town centre wards than the borough average.

11. Recorded **public order offences** are, respectively, up to 6x and 2x higher per km<sup>2</sup> in Bromley and Beckenham town centre wards than the borough average.
12. Recorded **antisocial behaviour public nuisances** are, respectively, up to 6x and 3x higher per km<sup>2</sup> in Bromley and Beckenham town centre wards than the borough average.
13. In terms of **alcohol related violent crime**, Bromley Town Centre ward has the highest number of incidents of the borough's 22 wards. Beckenham is fifth.
14. Between March 2019 and February 2021, the borough average was 2.5 **alcohol related violent crimes** per km<sup>2</sup>. However, in Bromley Town ward the rate of alcohol-related violent crimes per is 15 per km<sup>2</sup>. In Beckenham it was 8 per km<sup>2</sup>. This is 6x and 3x the borough average respectively.
15. In both town centres, the number of alcohol-related violent crime incidents fell substantially between March 2020 and February 2021 when much of the night-time economy was shuttered for most of this period.

## 5 Findings – CCTV data

16. CCTV camera data for 2018-2020 was analysed for Bromley Town Centre and Beckenham Town Centre.
17. In 2019 there were **2,063 recorded incidents in Bromley town centre**. Of these, 60% took place in the night-time hours and 41% could be linked to customers of licensed premises, the night-time economy, alcohol consumption, drug dealing, or begging associated with licensed premises.
18. In 2020 however, when much of the night-time economy was shuttered by Covid regulations for the majority of March to December, whilst the overall number of incidents in Bromley Town Centre rose from 2,063 to 3,621, the number of cumulative impact-related incidents fell to 440 (from 840 in 2019). This is a significant reduction in cumulative impact incidents when the night-time economy was closed.
19. This trend was mirrored in Beckenham where cumulative impact-related incidents fell by 50% - from 282 in 2019 to 141 in 2020.

## 6 Findings – London Ambulance Service callouts

20. Over the past four years, Bromley Town Centre ward (in which the CIP area sits) received 9x the borough average of **assault** callouts in the night-time economy per km<sup>2</sup>. In Beckenham it was 7x the borough average.
21. In the Bromley Town ward ambulance call outs for **alcohol related** incidents were 8x the borough average per km<sup>2</sup>. In Beckenham it was 4x the borough average.

## 7 Findings – Noise nuisance

22. **Noise in the street** complaints to the council by ward between 2018-21 showed that Bromley and Beckenham town centre wards and are ranked 1 and 2 respectively out of the 22 wards, albeit numbers are small.

## 8 Findings – Residents’ survey

23. Analysis was undertaken of the most recent annual residents’ survey of those questions which are linked to the presence and clustering of night-time or licensed premises, such as, **sexual crime, robbery, begging, groups loitering** and **drug use**. Residents of Bromley Town CIP area were *more likely* than the borough as a whole to say that these crimes or nuisance were a *fairly big* or *very big* problem locally. This was also true for **alcohol-related disorder** for residents within the Bromley Town CIP area than the borough average.
24. The number of respondents from Beckenham CIP area was too small to analyse.

## 9 Findings – Public health

25. Overall, the public health data is too general to pinpoint exact outcomes, but it does show that Bromley and Beckenham town wards both have higher than average alcohol-related negative indicators, such as harmful and hazardous drinking and hospital admissions.

## 10 Conclusion

26. Overall, there is a strong link between the high density clustering of premises in the two existing CIP areas of Bromley and Beckenham town centres and the presence of much higher than borough average levels of **crime and disorder** and **public nuisance**. Residents in Bromley CIP area also have greater than average concerns about **crime and disorder, public nuisance** and **public safety**. More research is required on the **protection of children from harm**.

## 11 Background

### 12 What is cumulative impact?

27. 'Cumulative impact', as defined by the S182 Guidance issued under the Licensing Act 2003 (revised 2018) is best summarised as follows: an area where a concentration of licensed venues, however small in number or well managed individually, causes problems or 'cumulative impact' beyond their immediate premises. In doing so, their impact must compromise one or more of the four licensing objectives, which are: the *prevention of crime and disorder, public safety*, the *prevention of public nuisance* and the *protection of children from harm*.
28. Examples of cumulative impact can be burdens on public transport, the police and cleansing teams or increases in crime or nuisance that impacts upon other public space users, deters non-users or affects residents or businesses.
29. The exact wording from the *Section 182 Guidance* (revised 2018) is shown below.

- 14.20 The concept of "Cumulative impact" has been described within this guidance and used by licensing authorities within their statements of licensing policy since the commencement of the 2003 Act. 'Cumulative impact assessments' were introduced in the 2003 Act by the Policing and Crime Act 2017, with effect from 6 April 2018. Cumulative impact is the potential impact on the promotion of the licensing objectives of a number of licensed premises concentrated in one area.
- 14.21 In some areas where the number, type or density of licensed premises, such as those selling alcohol or providing late night refreshment, is high or exceptional, serious problems of nuisance and disorder may arise outside or some distance from those premises. Such problems generally occur as a result of large numbers of drinkers being concentrated in an area, for example when leaving premises at peak times or when queuing at fast food outlets or for public transport.
- 14.22 Queuing in itself may lead to conflict, disorder and anti-social behaviour. Moreover, large concentrations of people may also attract criminal activities such as drug dealing, pick pocketing and street robbery. Local services such as public transport, public lavatory provision and street cleaning may not be able to meet the demand posed by such concentrations of drinkers leading to issues such as street fouling, littering, traffic and public nuisance caused by concentrations of people who cannot be effectively dispersed quickly.
- 14.23 Variable licensing hours may facilitate a more gradual dispersal of customers from premises. However, in some cases, the impact on surrounding areas of the behaviour of the customers of all premises taken together will be greater than the impact of customers of individual premises. These conditions are more likely to arise in town and city centres, but may also arise in other urban centres and the suburbs, for example on smaller high streets with high concentrations of licensed premises.

30. If the Council (which is also the licensing authority) is satisfied that there is cumulative impact, i.e., problems that cannot be dealt with at the individual premises level, it may introduce a cumulative impact policy (CIP) which is an area (or Cumulative Impact Policy area) with boundaries. In this area it then becomes the applicant's responsibility to prove how their application for a new or varied licence *won't* impact on the licensing objectives. This is a reversal of the usual principle where a responsible authority, such as the council,

police or community, has to prove that a new or varied licence *will* cause problems. It is sometimes known as the 'rebuttal presumption'.

31. Since 2018 it has been a requirement under the law for councils to review any cumulative impact areas at least every three years and to prepare a Cumulative Impact Assessment (CIA), i.e., evidence base, to support any retained or expanded CIP area. This document fulfils that purpose.

## 13 What is a cumulative impact assessment?

32. Below is the exact wording from the *Section 182 Guidance* (revised 2018) regarding the cumulative impact assessment.

14.24 A cumulative impact assessment (CIA) may be published by a licensing authority to help it to limit the number or types of licence applications granted in areas where there is evidence to show that the number or density of licensed premises in the area is having a cumulative impact and leading to problems which are undermining the licensing objectives. CIAs relate to applications for new premises licences and club premises certificates and applications to vary existing premises licences and club premises certificates in a specified area.

14.25 Section 5A of the 2003 Act sets out what a licensing authority needs to do in order to publish a CIA and review it, including the requirement to consult with the persons listed in section 5(3) of the 2003 Act. The 2003 Act does not stipulate how the CIA should be used once published, because the requirements for determining applications for new licences or variations are the same in areas with a CIA as they are elsewhere, as set out in sections 18, 35, 72 and 85 of the Act. However, any CIA published by a licensing authority must be summarised in its statement of licensing policy. Under section 5(6D) a

licensing authority must also have regard to any CIA it has published when determining or revising its statement of licensing policy.

14.26 The CIA must include a statement saying that the licensing authority considers that the number of premises licences and/or club premises certificates in one or more parts of the area described is such that it is likely that granting further licences would be inconsistent with the authority's duty to promote the licensing objectives. As part of the publication a licensing authority must set out the evidential basis for its opinion.

14.27 CIAs may relate to premises licensed to carry on any licensable activity, including the sale of alcohol for consumption on or off the premises, and the provision of late night refreshment. This includes late night refreshment providers which are not licensed to sell alcohol. A CIA may relate to all premises licences and club premises certificates in the area described in the assessment or parts thereof, or only to premises of a particular kind described in the assessment. For example, it may be appropriate for the licensing authority to only include off-licences or nightclubs within the scope of its assessment. The licensing authority must make clear, when publishing its CIA, which premises types it applies to. CIAs do not apply to TENs; however it is open to the police and environmental health authority (as relevant persons) to refer to evidence published within a CIA when objecting to a TEN.

14.28 While the evidence underpinning the publication of a CIA should generally be suitable as the basis for a decision to refuse an application or impose conditions, it does not change the fundamental way that decisions are made under the 2003 Act. Each decision in an area subject to a CIA therefore still needs to be made on a case-by-case basis and with a view to what is appropriate for the promotion of the licensing objectives. Importantly, the publication of a CIA would not remove a licensing authority's discretion to grant applications for new licences or applications to vary existing licences, where the authority considers this to be appropriate in the light of the individual circumstances of the case.

## 14 Methodology

33. The methodological approach to each type of data is shown at the start of each section. The S182 *Guidance* suggests the following sources of data be considered as part of the cumulative impact assessment.

- local crime and disorder statistics, including statistics on specific types of crime and crime hotspots;
- statistics on local anti-social behaviour offences;
- health-related statistics such as alcohol-related emergency attendances and hospital admissions;
- environmental health complaints, particularly in relation to litter and noise;
- complaints recorded by the local authority, which may include complaints raised by local residents or residents' associations;
- residents' questionnaires;
- evidence from local and parish councillors; and
- evidence obtained through local consultation.

34.

## 14 Findings: Licensed premises data

### 15 Background

35. There are 901 licenced premises (including club premises certificates) in Bromley borough
36. This does not include gambling premises (unless they have an alcohol or entertainment licence, e.g., a casino). Likewise, food premises, unless they have an alcohol or entertainment licence, are not included. In the case of takeaways, these are only classed as a licensed premise if they have a late-night refreshment licence (LNR).
37. The total also includes all off-licences, but does not duplicate the on-premises licence of, for example, a pub that has the ability to offer off-sales.

### 16 Findings

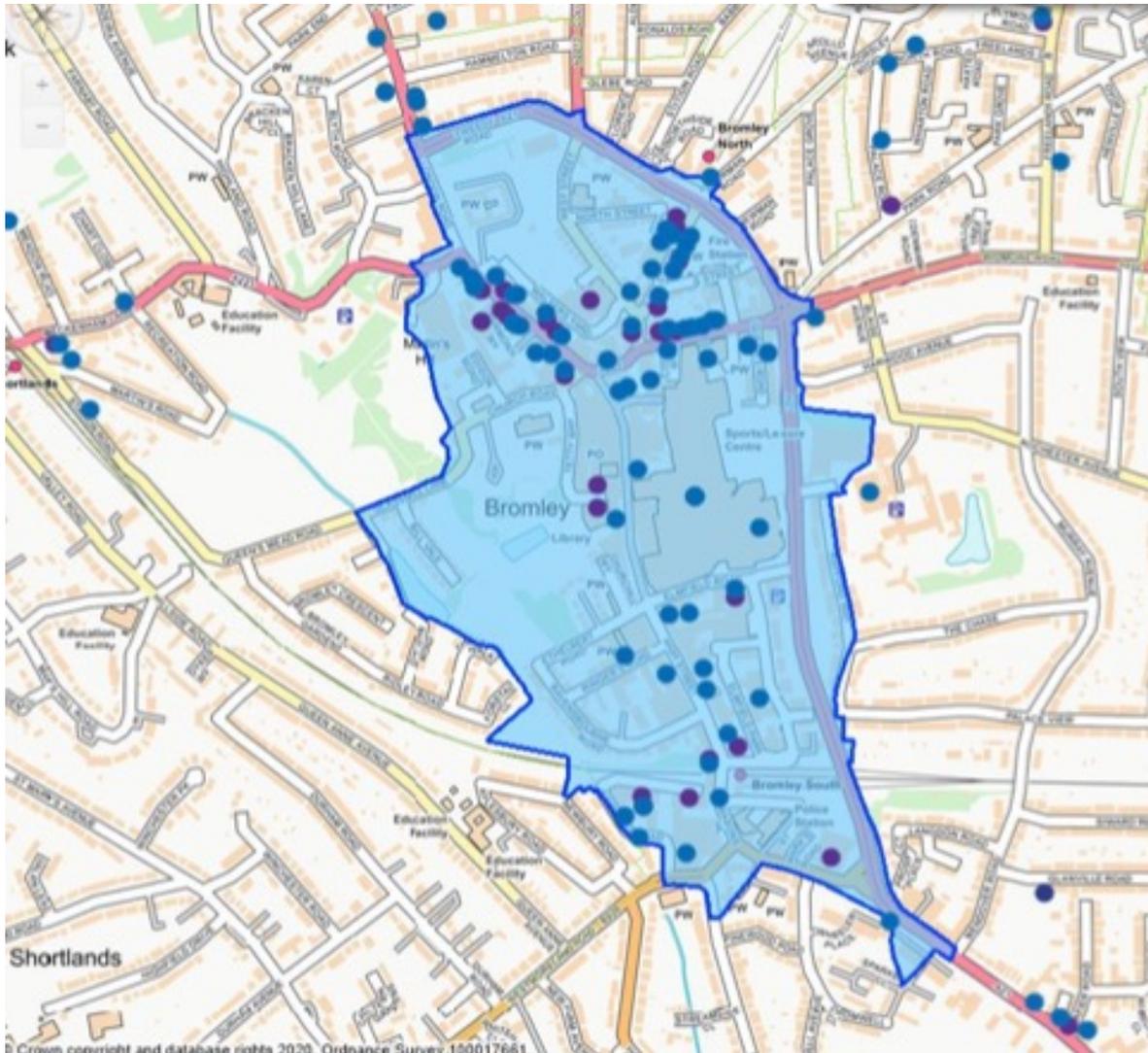
Figure 1 Number and type of premises in Bromley and Beckenham CIPs

Operational Type	Bromley CIP Premises	Bromley CIP %	Beckenham CIP Premises	Beckenham CIP %
Cinema/ theatre	4	4%	1	2%
Hotel	1	1%	0	0%
Late Night Refreshment	5	5%	3	5%
Nightclub	2	2%	2	3%
Off-licence	14	14%	13	20%
Other	5	5%	1	2%
Pub or Bar	14	14%	7	11%
Café-restaurant	45	46%	36	56%
Retailer	6	6%	0	0%
Sports / leisure club	1	1%	1	2%
<b>Total</b>	<b>97</b>	<b>100%</b>	<b>64</b>	<b>100%</b>

38. There are 97 physical licensed premises in Bromley and 64 in Beckenham.
39. The main differences between the two locations (beyond Bromley having around 52% more premises than Beckenham) is that Beckenham has a greater % of off-licences (20% vs 14%) and a higher proportion of cafes and restaurants (56% vs 46%). This is largely due to the number of 'other' and non off-licence retailers with alcohol licences in Bromley.
40. Relative to other borough's CIP zones of similar sizes, both towns have relatively few late night refreshment / takeaway premises but do have higher numbers of cafés and restaurants. The number of nightclubs and pubs / bars is fairly typical for these size town centres in outer London.
41. Below are maps showing the locations of the licensed premises within each town centre CIZ and the hinterland for context.

- 42. Due to the density of premises in both towns, some indicators are 'stacked' on top of each other due to the mapping software.
- 43. The blue indicators shows new licences, and the purple indicators show premises with recent minor variations.

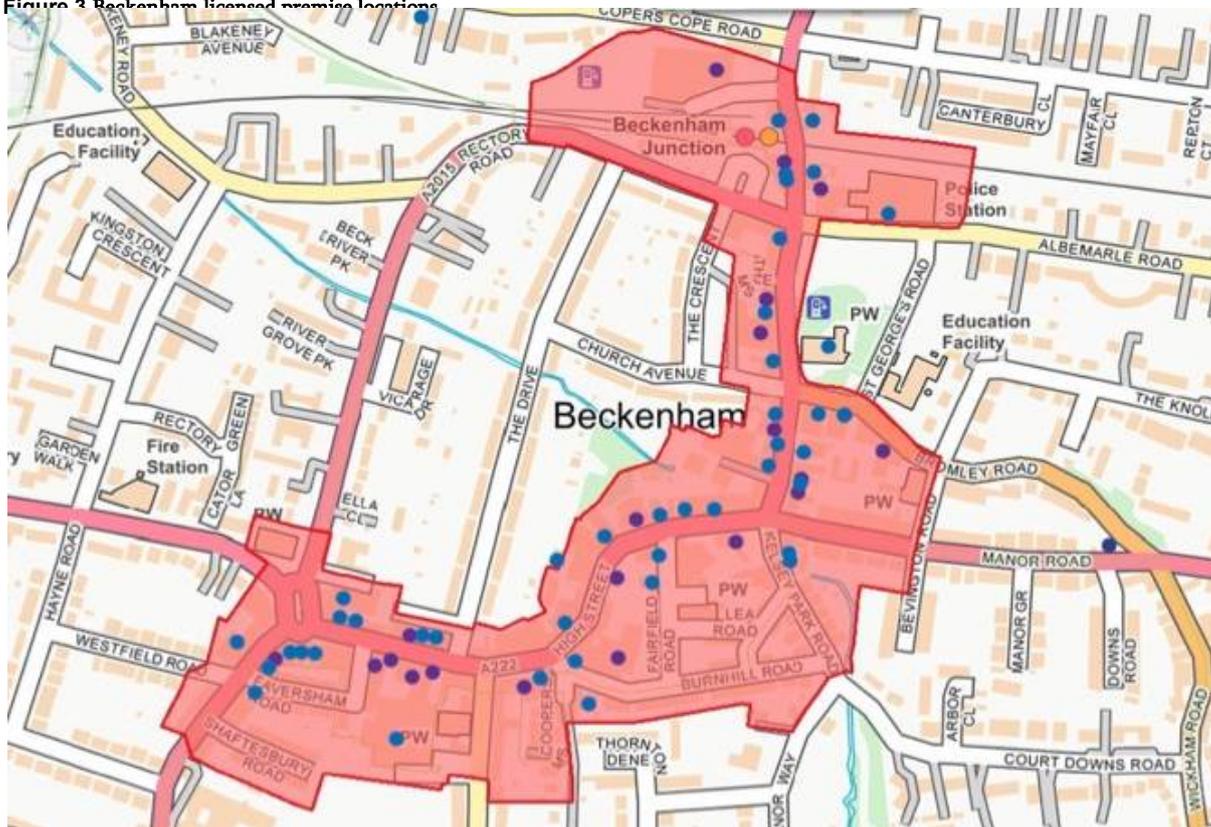
Figure 2 Bromley licensed premise locations



- 44. The majority of Bromley's licensed premises are located in a large cluster to the north of the town centre on East Street, West Street, the High Street (north) and the Market Square. There is a relatively empty area in the retail heart of the town and a smaller cluster to the south of the town around Bromley South rail station.
- 45. The map makes immediately apparent the large number of premises within the CIP and the boundary provides a natural fit with those premises. Outside of the CIP the number and density of premises drops off rapidly.

46. In future iterations, when Metropolitan Police analysts are available, more precise hotspot analysis within the CIP would be helpful. It is highly probable that the elevated levels of crime, disorder and nuisance are linked to the clusters of the licensed premises, but this iteration of the CIP study cannot categorically evidence this.

Figure 3 Beckenham licensed premises locations



47. Beckenham's licensed premises are spread more evenly throughout the town centre than those of Bromley with small clusters around Beckenham Junction Station, the central High Street and the western end of the High Street where it meets the War Memorial roundabout.
48. As with Bromley, the map makes immediately apparent the large number of premises within the CIP and the boundary provides a natural fit with those premises. Outside of the CIP the presence of premises drops off almost entirely (2 premises only). This is even more stark a contrast than with Bromley.

## 17 Comparative premises density

49. To understand premises density across the borough vs the two cumulative impact zones the size of each area was measured and factored against the number of premises within that footprint.

Figure 4 Comparative premises density

	<b>Bromley Borough</b>	<b>Bromley CIP</b>	<b>Beckenham CIP</b>
Number of premises	901	97	64
Area km sq	150.2	0.61	0.21
Premises per km sq	6	159	305

50. The densities are hugely different within the CIP areas to the borough as a whole.

51. The borough premises density is 6 licences per km<sup>2</sup>. Bromley CIP area has 27 times this density of premises per unit of area and Beckenham is 51 times this licence density. Licence density alone is not the only indicator of cumulative impact, but it is a pre-requisite.

## 18 Findings: Observational fieldwork

### 19 Background

52. Due to Covid restrictions during the research period, it was not possible undertake observational fieldwork to catalogue incidents over a series of representative nights (usually this would be around 12 to 18 days and nights). It is recommended that this is undertaken for the 2024 CIA.
53. However, site visits were made on two weekend days and nights in June when the town was partially opened (no nightclubs or vertical drinking was operational). The purpose was for the researchers to understand how the two towns work in terms of passenger flow, licensed venue clustering, urban design, CCTV coverage and residential proximity. Images with notes are shown below.

### 20 Observations - Beckenham

Figure 5 Adjacent to the Beckenham War Memorial roundabout licensed cluster are a large number of residential streets and routes home from the town centre



Figure 6 Tangential residential streets and routes home are a regular feature along the High Street



Figure 7 Numerous parts of Beckenham High Street suffer from narrow pavements and pinchpoints which are not suited to a busy night-time economy and where licensed venues disgorge directly onto the pavements



Figure 8 Sections of Beckenham High Street have benefitted from temporary pavements widening during the pandemic by removing parking. If made permanent this may help reduce pinchpoints and alcohol-related crime and disorder in the night-time economy



Figure 9 Sections of Beckenham High Street have benefitted from temporary pavements widening during the pandemic by narrowing roads. If made permanent this may help reduce pinchpoints and alcohol-related crime and disorder in the night-time economy



Figure 10 As well as residential side streets and apartments above shops in the High Street within the Beckenham CIP, the town also has new residential developments near to transport hubs which attract customers from night-time economy venues nearby late at night



## 21 Observations - Bromley

Figure 11 Bromley town centre CIP is divided into three sections – the southern rail station end where there is a small cluster of licensed venues (below), the central retail heart (which has fewer licensed venues) and the northern end of the town where the largest cluster of premises is located.

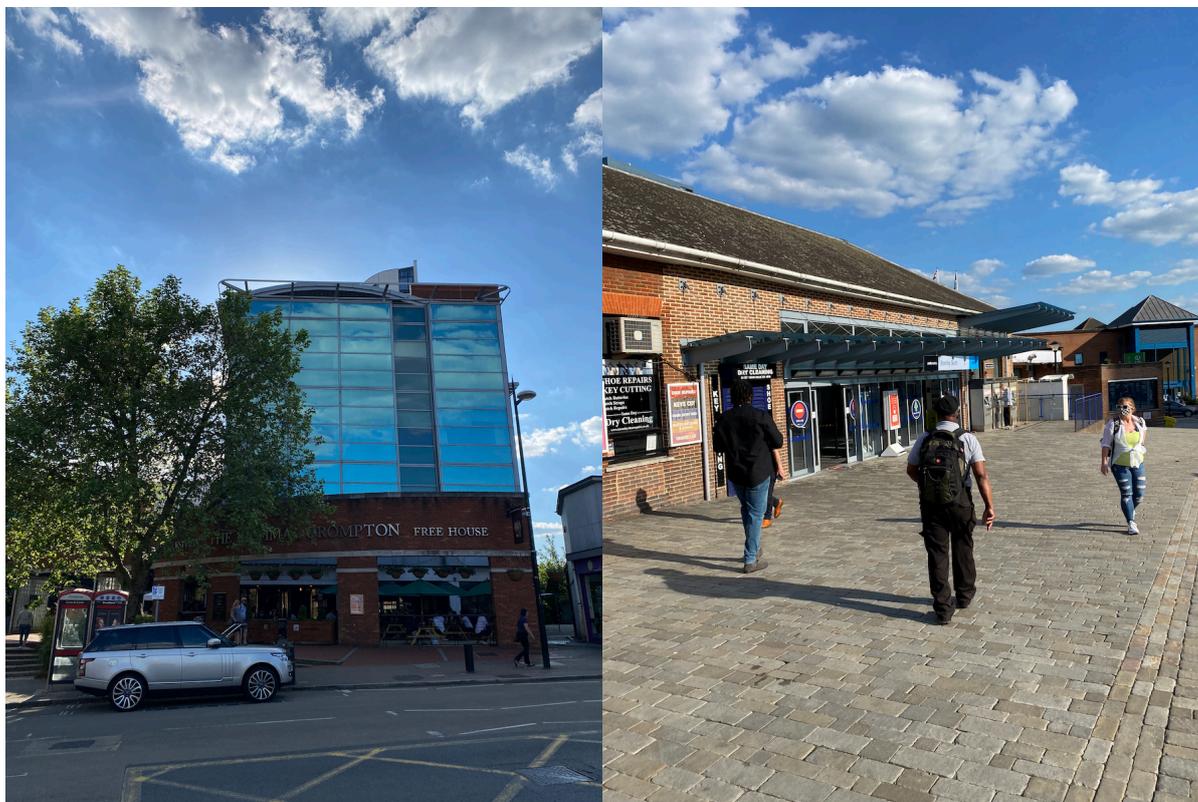


Figure 12 The Bromley town centre north public realm investment has created a much better environment for operators and visitors (day and night) and there are relatively few pinchpoints. However, there are residential streets around the north of the town centre.

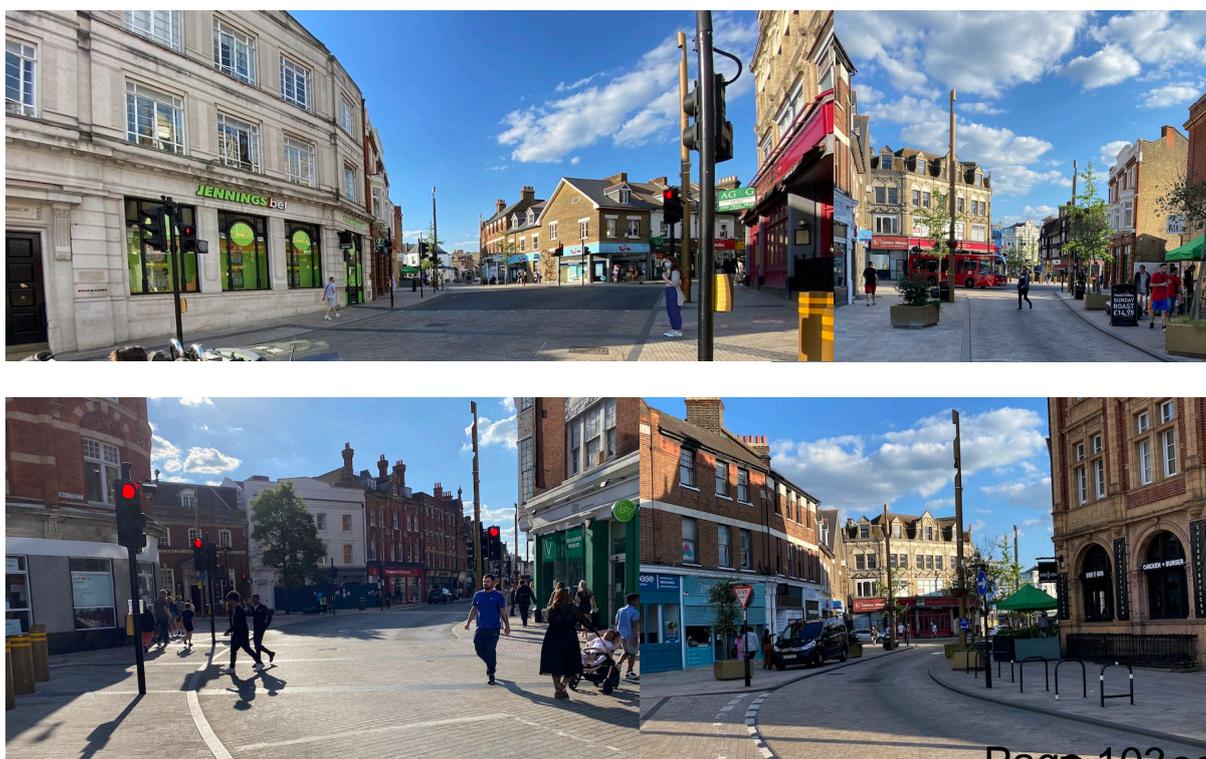


Figure 13 The Bromley town centre north section of the CIP has the greatest concentration of licensed venues in the Borough. Within an area that is 0.2km<sup>2</sup> approximately 65 of Bromley town centre' CIP's 97 licences are located. This density is similar to central London areas such as Soho and Shoreditch.



Figure 14 However, around and within the Bromley town centre north section of the CIP there is also a large amount of residential accommodation



## 22 Findings: Crime & disorder and public nuisance

### 23 Background

54. The Metropolitan Police were unable to provide analyst capacity to support the study. This means that the study has relied upon the SafeStats crime dashboard. A FoI request was also put in for alcohol related data.
55. SafeStats is the online crime statistics portal developed by the Mayor of London, GLA and MOPAC for London borough community safety partnerships to analyse a number of crime related data sets for their area and for comparative purposes. The largest data sets are those anonymised from CRIS (the Met's Crime Reporting Information System), but there are also data sets from British Transport Police and London Ambulance Service call outs.
56. In addition to the SafeStats data, in order to gain a more nuanced picture of the type of incident in the two CIP areas and how this might or might not constitute cumulative impact, anonymised CCTV data was produced for the two areas. This is shown in the following section.

### 24 SafeStats data

57. The challenge with the Metropolitan Police data within SafeStats - in its application for understanding cumulative impact - is that it does not disaggregate by the hour, or by day of week. It can only be divided by year, month and type of crime. Therefore, for the purposes of this study we have had to use the data
58. Before presenting the findings, for comparative purposes, an analysis was undertaken of both the size of each ward and its population. This is important as it gives a way of comparing **incident density** and **crime per capita**.
59. In terms of area, Bromley Town ward is 3.7km<sup>2</sup> which is **2.5%** of the borough's total area. Beckenham Copers Cope is similar though slightly smaller at 3.3km<sup>2</sup> and **2.2%** of the borough's total footprint. The average ward is 6.8km<sup>2</sup> and thus makes up **4.6%** of the borough's total footprint.
60. It is important to note that Bromley Town and Copers Cope wards do not match the exact boundaries of the current CIP areas. The CIP areas, whilst at the heart of each ward, are considerably smaller. This is because data is only available at this level – data is not provided by SafeStats at CIP level across London.
61. To this end, the figures thus presented here are highly conservative and defensible. In reality, the comparative figures for density of crime are likely to be much higher for each CIP. This is because the ward figures also cover the residential areas that make up the bulk of each ward. The majority of the licensed premises in each ward are located within the respective CIP area. Future analysis, when Metropolitan Police analysts are available, should seek to examine the crime data only for the CIP areas.
62. The population of each ward using the council's own most recent population estimates is as follows: Bromley Town 18,600 and Beckenham Copers Cope 15,950. **This is 5.8% and 5.0% of the borough's total population** respectively.

63. The higher than average size of population reflects the higher density of the two areas being town centres rather than the more suburban wards in the borough. For comparison, the average size Bromley borough ward, at 6.8km<sup>2</sup>, is around twice the footprint of Bromley Town and Beckenham Copers Cope. The population level is relatively similar given the average in the borough is around 14,500.
64. All figures that are more than 10% higher than the borough average are shown in **red**. Those in **orange** are within 10% above or below the borough average. Those in **green** are those figures for CIP wards where crime and nuisance incidents are lower than the borough average by 10%.
65. As can be seen from the majority of indicators for both Bromley Town ward CIP and Coper's Cope ward CIP, the figures are higher than the borough averages. Sometimes substantially so.

## 25 Violent and sexual offences

66. The table below shows the most serious offences recorded violent and sexual offences for the past four years.
67. These indicators are often used by the Home Office and police forces as a proxy for night-time economy and alcohol-related crime, albeit it is important to note that not all of these incidents will have taken place at night or in or around or by customers of licensed premises. But as noted above, there will be many incidents which are not reported (albeit underreporting is by its nature lower for the most serious offences).

Figure 15 VIOLENT AND SEXUAL offences in Bromley and Beckenham, 2017 to 2020

<b>Violent &amp; Sexual Offences</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
Bromley	705	661	726	680
as % of Borough	11.1%	10.3%	10.8%	10.3%
Beckenham	364	391	340	301
as % of Borough	5.7%	6.1%	5.0%	4.6%
Bromley Borough	6372	6421	6749	6579
Ward average	290	292	307	299
No Wards	22	22	22	22

68. Overall, *recorded* violent crime and sexual offences in Bromley town centre ward have remained relatively consistent over the past 4 years at around 690 per year (between 10-11% of all those recorded in the borough).
69. There are more than twice as many violent crime and sexual offences in the Bromley town centre ward as the borough average, despite the ward being around half the size of the borough average. This means that, per km<sup>2</sup>, violent crime and sexual offences in the Bromley town centre ward are 4x higher per unit of area, than the borough average.
70. There was a small reduction in recorded violent crime and sexual offences in the Bromley town centre ward during 2020 when there were substantial restrictions in trading for night-time economy licensed premises for much of the year.
71. Beckenham Copers Cope ward experiences around half the number of violent crime and sexual offences compared to Bromley Town. However, it is still above the borough ward average and given that Copers

Cope is half the size of the average ward. This means that the rate of violent crime and sexual offences per km<sup>2</sup> in Beckenham is around twice the Bromley borough average.

## 26 Drugs offences

72. Below are the drugs offences recorded in the two CIP wards for the past four years. Drugs offences include both the dealing of drugs and the possession of them. By the nature of this crime, the figures will only represent a very small proportion of drug possession and supply incidents.

Figure 16 DRUGS offences in Bromley and Beckenham, 2017 to 2020

Drugs	2017	2018	2019	2020
Bromley	97	146	215	276
as % of Borough	17.1%	22.0%	21.0%	23.3%
Beckenham	27	28	52	63
as % of Borough	4.8%	4.2%	5.1%	5.3%
Bromley Borough	567	664	1025	1185
Ward average	26	30	47	54
No Wards	22	22	22	22

73. Bromley Town Centre ward has by far the highest levels of drugs offences in the borough, with an average over the past four years of over 20% of all incidents. These have grown year on year. Even during the lockdown dominated year of 2020 these peaked at almost a quarter of all the borough's offences. This reflects the use of drugs within the night-time and licensed economy, but also their consumption in public spaces. This is reflected in the CCTV incidents (see next chapter) which show frequent drug taking in locations from parks to car parks.
74. Given the Bromley Town ward is around half the size of the average ward in Bromley borough, this means that recorded drugs offences here in 2020 were around 10x the ward average per km<sup>2</sup>.
75. Beckenham town centre ward is much closer to the borough ward average in absolute numbers of drugs offences, albeit the numbers of recorded offences grew substantially in the last two years. However, as with Bromley Town, Beckenham is much smaller than the average ward, so drug offences were around 2x the borough average per km<sup>2</sup>.

## 27 Robbery

76. Robbery includes what is commonly known as mugging. This is different from theft from the person (see below) because it is aggravated, often using threats of violence the implicit or explicit presence of a weapon.

Figure 17 ROBBERY offences in Bromley and Beckenham, 2017 to 2020

Robbery	2017	2018	2019	2020
Bromley	148	101	119	99
<i>as % of Borough</i>	24.8%	23.0%	24.3%	19.9%
Beckenham	35	18	29	21
<i>as % of Borough</i>	5.9%	4.1%	5.9%	4.2%
Bromley Borough	597	440	489	497
Ward average	27	20	22	23
No Wards	22	22	22	22

77. Bromley Town ward has a substantial minority of all the robbery incidents that take place in the borough, ranging from 20% in 2020 to almost a quarter four years ago.
78. Given a large amount of robbery is opportunistic and linked to the presence of people in town centres, this is unsurprising. However, there is a strong known link to victims being users of the night-time economy (albeit this is not the only setting in which it takes place, e.g., robbery in parks during daylight are common, as are people walking home from transport hubs on their return from work at night).
79. Given Bromley centre town ward is geographically around half the size of the borough's average ward, this means that the incident ratio per km<sup>2</sup> is around 10 to 12x the borough average over the last four years.
80. Beckenham town centre ward has been around or significantly above the borough average for robbery incidents in absolute terms across all of the past four years. However, it is around a quarter to a fifth of the levels of Bromley town centre ward. Yet because of its small size of Copers Cope, the per km<sup>2</sup> ratio varies between 2 and almost 3 times the borough ward average.
81. There has been a reduction in 2020 in both towns compared to 2017 and 2019 (although). This may be due to the, but it is not possible to tell without the detail of each crime.

## 28 Theft from the person

82. Theft from the person includes the lifting of bags, laptops, wallets and purses and very commonly mobile phones, as well as pickpocketing. In most cases the difference between robbery is clear, as there is no violence or threat of violence towards the individual in theft from the person, though the difference can sometimes be subtle. Theft from the person is prolific in the night-time economy and licensed premises because this is an area where people do leave their personal items unattended or are intoxicated and less careful than they may otherwise be.

Figure 18 THEFT FROM THE PERSON offences in Bromley and Beckenham, 2017 to 2020

Theft from Person	2017	2018	2019	2020
Bromley	101	126	245	171
<i>as % of Borough</i>	34.6%	41.9%	57.2%	56.3%
Beckenham	28	36	28	8
<i>as % of Borough</i>	9.6%	12.0%	6.5%	2.6%
Bromley Borough	292	301	428	304
Ward average	13	14	19	14
No Wards	22	22	22	22

83. Bromley Town Centre wards has been by far the biggest locus for theft from the person in the borough over the past four years. Indeed, in the past two years over half of all recorded offences in the borough took place in Bromley Town Centre ward.
84. Taking into account the small size of the Bromley Town Centre ward, there were on average 22xs as many incidents of theft per the person per km<sup>2</sup> here in 2020 than the average Bromley borough ward and 24x more in 2019 per km<sup>2</sup>.
85. Beckenham town centre ward suffered significantly less theft from the person than Bromley Town Centre, but has over three of the four years studied still been substantially above the borough average, only falling under the average in 2020.
86. Beckenham town centre ward has averaged 25 thefts recorded each year over the past four years, against a ward average of 15. Given the small size of this ward this still means that the number of incidents per km<sup>2</sup> here is 3.4 times that of the borough average.

## 29 Public order

87. Public order is not a crime that is dominated by the night-time economy offences like many of those above, as it can include rioting, religious or race hatred of certain types, harassment and public disorder. But because it does include drunk and disorderly offences, affray, mass brawls (where there is a threat to the wider public in addition to any individual charges) - offences that are typically found in the night-time economy - public order was considered worthy of examination.

Figure 19 PUBLIC ORDER offences in Bromley and Beckenham, 2017 to 2020

Public Order	2017	2018	2019	2020
Bromley	225	222	212	221
<i>as % of Borough</i>	16.2%	15.0%	13.7%	13.7%
Beckenham	64	59	73	64
<i>as % of Borough</i>	4.6%	4.0%	4.7%	4.0%
Bromley Borough	1390	1476	1546	1614
Ward average	63	67	70	73
No Wards	22	22	22	22

88. Bromley Town Centre ward has substantially higher levels of public order offences than Bromley borough average. Incidents have remained remarkably consistent around 220 per year, though as a proportion of the borough these have fallen slightly in the last two years.
89. Given the small nature of the Bromley Town Centre ward, in relative terms over the past four years it has around 6x the borough ward average of public order offences per km<sup>2</sup>.

90. Beckenham town centre ward is much closer to the borough average number of public order incidents, with two of the four years being lower by more than 10%. However, given the small size of the ward this still means that, per km<sup>2</sup>, this is more than 2x the number of public order crimes recorded per km<sup>2</sup>.

### 30 Anti-social behaviour

91. ASB, like public order, is a crime that is highly prevalent in the night-time economy where the consumption of alcohol exacerbates or lowers the threshold at which such negative behaviour takes place, but it is also found in other settings, notably retail and public place and areas where youth crime is prevalent.
92. ASB is wide ranging and sometimes includes crimes which have been initially recorded as ASB, such as criminal damage. The Home Office divides ASB into four categories: misuse of *public space*; *disregard for personal / community wellbeing*; *acts directed at people* and *environmental damage*.
93. ASB in 2020 is quite a different picture to previous years with over twice the average number of incidents in the borough. Research from other London boroughs suggests that this has been fueled by reports of those not observing Covid guidelines in parties, illegal house parties and raves, as well as unlawful behaviour in public spaces given the increases in public drinking when pubs, bars and restaurants and nightclubs were shut.

Figure 20 ASB offences in Bromley and Beckenham, 2017 to 2020

ASB	2017	2018	2019	2020
Bromley	753	753	938	1638
as % of Borough	13.2%	14.9%	16.1%	15.1%
Beckenham	364	340	414	732
as % of Borough	6.4%	6.7%	7.1%	6.8%
Bromley Borough	5708	5048	5822	10815
Ward average	259	229	265	492
No Wards	22	22	22	22

94. The Bromley Town Centre ward has consistently been the ward with the largest amount of recorded ASB in the last four years in Bromley Borough, having around 15% of all incidents. This is 6x the ward average per km<sup>2</sup>.
95. Beckenham has significantly lower ASB than Bromley Town Centre ward, but this is still much higher than the borough ward average (approximately 1.5x). By km<sup>2</sup> this works out at around 3x the borough average.

### 31 Alcohol related violent crime

96. An analysis of alcohol-related recorded crime was undertaken following a freedom of information request to the Metropolitan Police.

97. It is important to note here because of the poor recording standard for alcohol crime, the overall number of incidents will be much higher. The reason for this is that officers rarely and, in some cases, never add the alcohol maker to the main reason for arrest. Alcohol markers, even for drunk and disorderly offences, are not automatically added.
98. This is also true of alcohol related hospital admissions, which studies have shown are a true fraction of the real total because the admissions where alcohol was involved (except those where alcohol was the main reason for admission) are rarely accurately captured.
99. As a result, this should be considered with caution in terms of overall figures which are small. But the data that has been provided (see following table) does show that Bromley Town Ward has almost twice the number of incidents as its next closest next ward (Cray Valley East). Beckenham's Coper Cope town centre is fifth.

Figure 21 Alcohol-related violent crimes by ward marked as alcohol related 2019-2021

Ward	Mar 2019-Feb 20	Mar 2020-Feb 2021	Two year total
Bromley Town	31	23	54
Cray Valley East	17	14	31
Crystal Palace	17	13	30
Plaistow and Sundridge	19	9	28
Copers Cope	16	9	25
Penge and Cator	11	13	24
Orpington	15	8	23
Hayes and Coney Hall	15	5	20
Mottingham and Chislehurst North	11	9	20
Petts Wood and Knoll	10	9	19
Bromley Common and Keston	7	10	17
Clock House	8	7	15
Cray Valley West	14	\'	14
Kelsey and Eden Park	7	7	14
Chislehurst	8	4	12
Farnborough and Crofton	6	4	10
Darwin	5	1	6
Bickley	3	3	6
West Wickham	3	3	6
Biggin Hill	2	2	4
Chelsfield and Pratts Bottom	0	2	2
Shortlands	1	0	1
<b>Grand Total</b>	<b>226</b>	<b>155</b>	<b>381</b>

100. It is worth noting that the number of alcohol-related violent crimes fell in nearly all wards in 2020/2021 when the night-time economy and licensed venues were shuttered for most of the year, particularly at night with curfews and venues only able to operate at a fraction of normal capacity and offer table service only.
101. When considering the number of incidents per unit of area, over the two years the borough average is 2.5 alcohol-related violent crimes per km<sup>2</sup>. However, Bromley Town Ward is smaller than the average ward and here the rate of alcohol-related violent crimes per is 15 per km<sup>2</sup>. In Beckenham the rate is alcohol-related violent crimes is 8 per km<sup>2</sup>. This is 6x and 3x the borough average respectively.

## 32 Findings: CCTV data

102. CCTV data was anonymised and passed to the researchers. This gives descriptions of each incident recorded by CCTV operatives.
103. It is important to note that CCTV data cannot be seen as a 'census' of all crime and disorder or public nuisance taking place in the two CIP area town centres under consideration. There are a number of reasons for this, and these are as follows.
104. Whilst there are 34 main council cameras in Bromley town centre and 12 in Beckenham, they cannot possibly cover every location and every simultaneous incident. There are limits on what one operator can record at any one time, and they must also prioritise.
105. Most serious incidents of violence, robbery and disorder will be seen or reported to the CCTV control room by either the police or the security at licensed premises. However, the much larger number of low level incidents that are taking place will either be missed by operators or not prioritised because the operator needs to focus on the most serious incident at any time.
106. It is not possible, without having a team of observers on every street corner to capture closer to 100% of incidents (a census), to understand what the proportion of *all* incidents CCTV operators record. Experience in this kind of research tells us it will be many times the actual number recorded.
107. It is also worth noting that CCTV cameras are sometimes not working, obscured due to trees or buildings and times when the operator may not be there.
108. However, as a two year programme of data collection that gives a very significant and robust picture of the type of crime and disorder and public nuisance that is taking place, and crucially, at what times of days and days of the week it is taking place, the data is robust.
109. Also, noise incidents are not captured. Other cumulative impact studies, where field observation has taken place, show that noise is a major public nuisance issue for residents in and around the night-time economy and clusters of licensed premises. As such this element will be missing from the CCTV data.
110. In terms of how the data was analysed, the 6,831 incidents from 2018 and 2019 were manually reviewed and included or excluded based on whether they were night-time economy associated or with a direct connection to the cumulative impact of licensed premises. The following criteria was used for cumulative impact:
- Was there a mention of somebody entering, leaving a licensed premises (this includes late night refreshment places as well as pubs, bars, restaurants etc.)
  - Was somebody demonstrably drunk or exhibiting intoxicated behaviour (alcohol or durn) in the town centre?
  - Was there a fight, altercation, theft use of drugs that could be linked to users of the night-time economy?
  - Was there begging associated with licensed venues specifically or targeting of the users of the night-time economy who would not be there if there were not clusters of licensed premises.

- Any other incident that has a reasonable connection to the customers of the night-time economy and licensed venues, whether as perpetrator or victim of crime.

111. It is important to note that in many instances it is not possible (by the very nature of CCTV data) to categorically prove that each incident is *absolutely* linked to a licensed premises in the town centre or not. The 'balance of probability' has been used based on the fine grain detail of the individual reports. For example, if someone is staggering around in the street, whether day or night, they will likely have been drinking alcohol. In the evening and at night this tends to be people who will have had most or all of their alcohol in the towns' pubs, bars and clubs (although they may have pre-loaded with alcohol from venues not in the town centre).
112. It is also worth noting how cumulative impact is to be interpreted (beyond the broad statement in the Guidance) is not proscribed in detail by law. If there is a negative externality from the presence of licences, then it does not matter whether or not it is a serious crime. If someone's action creates a negative impact of any kind, then it can be seen as cumulative impact.
113. So, for example, whilst an incident may take place inside a venue (and is thus in the first instance it is the responsibility of that licensee), nearly every one of these incidents has an impact beyond the venue. So, for example, aggressive or violent inside a pub becomes cumulative impact once they are ejected onto the street. If a police vehicle or ambulance is despatched to bring someone out, simply the presence of these vehicles is likely to have a significant impact on whether local residents think their town centre is safe, pleasant or a place they want to go out in (*public safety*).
114. This is also the case with begging. Beggars are generally begging first and foremost for money, alcohol, drugs or food, but their presence in the evening and night-time economy has become (as can be seen in these statistics) an increasing presence over the past decade in the night-time economy. They are attracted specifically by customers of pubs, bars and restaurants and, even if not aggressively begging, this is an issue of *public nuisance* and *public safety*. However, begging during the day around shops has been explicitly excluded.
115. Drug dealing is another area where there is considerable room for interpretation. During the day Bromley in particular has significant drug dealing and drug use. However, it at this time of day it does not appear to be linked to customers of licensed premises. However, most incidents after 6pm and before 6am would not be happening in the two town centres if there were not a night-time economy in them. These incidents are therefore included.
116. Overall, the definition of cumulative impact for this study is anything that could negatively affect the four licensing objectives that takes place because, on the balance of probability, there is a cluster of licensed premises in each town.

### 33 Findings

117. Overall, there were more 3x the number of overall incidents captured in Bromley than Beckenham in 2019 (2,063 vs 622). This is unsurprising because the town centre is considerably larger.
118. However, there are other reasons linked to the fine grain of the data why Bromley has such a high number. A very large number of incidents are linked to the Glades shopping centre, and a much larger number of

individuals attracted to Bromley town centre who are rough sleepers and who frequently beg and have alcohol and / or drug dependency issues.

Figure 22 BROMLEY CCTV CI incidents 2019 & 2020

Bromley	2019 total	2019 NTE	2019 CI	2020 total	2020 NTE	2020 CI
January	193	76	40	263	123	43
February	212	105	81	375	192	72
March	212	138	102	332	152	45
April	139	87	68	244	118	21
May	134	80	58	207	95	17
June	126	83	56	292	130	15
July	201	130	82	352	177	36
August	191	111	75	375	226	51
September	157	113	73	253	150	37
October	135	89	64	353	183	46
November	196	118	67	245	107	23
December	167	108	74	330	149	34
<b>Total</b>	<b>2063</b>	<b>1238</b>	<b>840</b>	<b>3621</b>	<b>1802</b>	<b>440</b>
Percentages	100%	60.0%	40.7%	100%	49.8%	12.2%

119. There was a very significant increase in Bromley's total incident count in 2020 from 2019 (up from 2,063 to 3,621 – a 76% increase). This is despite the two lockdowns which affected not only the night-time economy but also non-essential retail which is a key part of Bromley town centre's land use. It is impossible to be absolutely certain, but analysis of the individual incidents suggests that there was considerably more low level anti-social behaviour recorded in 2020. (NB the number of CCTV incidents relating to lack of social distancing was limited so it is not this that drove up numbers).

120. In terms of all night-time incidents (between 6pm and 6am) there was a less substantial increase in incidents in Bromley between 2019 and 2020 of 46%.

121. However, of greatest significance to this cumulative impact study is the huge fall (from 840 to 440) incidents that can be classified as cumulative impact between 2019 (when the town was operating normally in terms of licensed premises) and 2020 when the pandemic restrictions impacted. It is clear than when the pubs, bars, restaurants and clubs were restricted in capacity and closed for long periods for all 9 months in the case of nightclubs), that cumulative impact fell substantially.

122. The table below shows Beckenham's figures.

Figure 23 BECKENHAM CCTV CI incidents 2019 & 2020

Beckenham	2019 total	2019 NTE	2019 CI	2020 total	2020 NTE	2020 CI
January	68	51	28	18	16	12
February	22	18	12	35	33	22
March	30	25	17	45	33	19
April	32	25	15	28	20	5
May	45	36	22	49	31	12
June	58	51	32	45	37	10
July	51	44	26	59	32	14
August	57	42	27	62	40	12
September	90	67	40	42	22	9
October	56	35	21	43	28	10
November	68	51	28	50	34	7
December	45	33	14	49	36	9
<b>Total</b>	<b>622</b>	<b>478</b>	<b>282</b>	<b>525</b>	<b>362</b>	<b>141</b>
<i>Percentages</i>	100%	76.8%	45.3%	100%	69.0%	26.9%

123. The trend for a reduction in CI-related incidents in 2020 is mirrored (ablet not quite as extremely) in Beckenham, with a fall from 45% of all incidents in 2019 to 27%. The reason that the fall is not so extreme is that there was a small fall in overall incidents in Beckenham (rather than the substantial increase seen in Bromley).

## 34 Findings: London Ambulance Service

### 35 Background

124. Ambulance call outs for assaults in the night-time economy and alcohol-related illnesses are a recognised indicator of cumulative impact, though it is impossible with the alcohol element to know that every person who is picked up was using a licensed premises (be it on-premises like a pub or nightclub, and off-premises like off-licence or supermarket or late night refreshment premises).
125. Because London Ambulance Service (LAS) data on Safe Stats (unlike Met Police data) can be analysed by time of day, and day of week, the study uses only Friday and Saturday night callouts from 9pm to 6am the following morning. This deliberately underestimates the number of callouts overall and is a conservative technique that reduces to a minimum any incidents that are not related to licensed premises or the night-time economy. For example, domestic violence in residential settings within the town (albeit alcohol from off-licence or supermarket may have been an aggravating factor in these incidents).
126. To get as close as possible to the nature of each incident, each call out was manually reviewed and the researchers sought to eliminate any that were unlikely to be linked to licenced premises or the consumption of alcohol in the town centre.
127. There will be a very large number of incidents which ambulances were called out to but where alcohol was not recorded by the paramedics. As a result, the figures below are likely to be a *significant* underestimate of the true picture of alcohol and assaults in the two towns.

### 36 Ambulance assault callouts

128. The table below shows the number of assault callouts likely to be linked to licence premises and the night-time economy over the past four years.

Figure 24 LAS ASSAULT call outs, Bromley Town Centre and Beckenham Copers Cope wards (Weekends 9pm-6am)

LAS - Assault Call Outs	2017	2018	2019	2020
Bromley	43	34	41	19
as % of Borough	20.9%	21.4%	27.7%	16.7%
Beckenham	25	14	9	17
as % of Borough	12.1%	8.8%	6.1%	14.9%
Bromley Borough	206	159	148	114
Ward average	9	7	7	5
No Wards	22	22	22	22

129. In Bromley Town Centre ward, incidents were fairly consistent over the years 2017 to 2019 but halved in 2020. An average of 22% of all the borough's LAS assault call outs take place in Bromley Town Centre ward.

130. Given that the Bromley Town Centre ward covers just 2.5% of the borough, this means that the ward receives 9x the borough average of assault call outs linked to the licensed and night-time economy per km<sup>2</sup>.
131. Beckenham town centre ward also has considerably more assault ambulance call outs than the borough average. As the ward is small, in relative terms, the number of assault call outs per km<sup>2</sup> is therefore 7x the borough average.

Figure 25 LAS ALCOHOL illness call outs Bromley Town Centre Ward CIP and Beckenham Copers Cope ward CIP

LAS - Alcohol Call Outs	2017	2018	2019	2020
Bromley	68	47	58	29
<i>as % of Borough</i>	21.1%	16.2%	21.2%	16.3%
Beckenham	32	28	23	13
<i>as % of Borough</i>	9.9%	9.7%	8.4%	7.3%
Bromley Borough	322	290	273	178
Ward average	15	13	12	8
No Wards	22	22	22	22

132. In the Bromley Town ward ambulance call outs for alcohol related incidents on weekend nights are very similar to the assault call outs, with an average of 18% of the borough's ambulance trips over the past four years.
133. This is a figure of 8x the borough average per km<sup>2</sup> .
134. Beckenham is lower than Bromley, at around a tenth of all the alcohol call outs in the borough. But again, this substantially above the borough average and about 4x the borough ward average per km<sup>2</sup>.
135. In terms of alcohol-related call outs, which are more particular closely linked to the night-time economy, the number of call outs in Bromley was 50% lower in 2020 (when the night-time economy was mostly shuttered) than the previous three year average.
136. In Beckenham the number of call outs was 54% lower in 2020 than the average number of call outs over the previous three year average.

## 37 Findings: Noise nuisance

137. Analysis was undertaken of the council's Noise Reporting Database for examples of noise pollution and public nuisance for 2019 which may be substantially or partly linked to the licensed economy.
138. It should be noted that, as evidenced in other CIP studies (e.g., Hounslow, Richmond, Hammersmith and Fulham), reported incidents will be a tiny fraction of those taking place during the same time period when those locations are under field observation. However, when considered cumulatively, this can still have a significant negative impact on the community and residential wellbeing.
139. There are 20 noise used in noise reporting in Bromley. Of these, **three** may be linked to the presence of licensed premises, events and the night-time economy and which have meaningful data attached to them. These are 'Noise in the street', 'Noise from licensed premises' and 'Noise from live concerts'.
140. The records are from 1<sup>st</sup> January 2018 to 14<sup>th</sup> May 2021.
141. It is important to note that not all of these complaint categories are uniquely cumulative impact problems. Noise coming from customers who have left premises and are in the street outside or walking home can be very much considered cumulative impact.
142. However, noise coming from a licensed premises, whilst it can have an impact on neighbours, cannot in the strictest terms be considered cumulative impact (as it should be dealt with by the authority on a case-by-case premises basis).
143. However, a resident near the town centre may be kept awake or have their quality of life impacted upon by the general travel of sound from a cluster of licences premises where it is hard to pin down a specific source. To this end it is for the purposes of this research reasonable to at least reference these to licensed premises or events.

Figure 26 Noise IN THE STREET complaints by ward 2018-21

WARD	COMPLAINTS
<b>BROMLEY TC</b>	<b>31</b>
<b>COPERS COPE</b>	<b>13</b>
CRYSTL	12
BROCOK	10
CHIS	10
CRAYWW	10
PENCAT	9
WESTWK	8
CRAYVE	7
KELEDN	6
PLASUN	6
BIGHIL	5
CLOCK	5
HAYCON	5
ORPTON	5
MOTCHN	4
CHEPRB	3
FARCRT	3
BICK	2
DARWIN	2
SHORT	2
PETSWK	

144. Overall numbers of noise in the street reports were relatively low. However, Bromley Town and Copers Cope were the two highest wards, with Crystal Palace next. It is worth noting that it is not possible to ascribe every incident in this category to the customer of a licensed premises. However, these incidents are highest in the two wards that cover the CIP areas with by far the largest concentrations of licensed premises in the borough.

Figure 27 Noise from LICENSED PREMISES complaints by ward 2018-21

WARD	COMPLAINTS
<b>COPERS COPE</b>	<b>108</b>
CHIS	40
KELEDN	38
CLOCK	37
<b>BROMLEY TC</b>	<b>31</b>
PLASUN	24
DARWIN	13
PENCAT	12
HAYCON	9
CRYSTL	8
PETSWK	8
WESTWK	7
BICK	5
BROCOK	4
FARCRT	4
CRAYVE	3
ORPTON	3
MOTCHN	2
BIGHIL	1
CHEPRB	0
CRAYWW	0
SHORT	0
	<b>357</b>

145. Noise from licensed premises is one of the most consistent forms of noise nuisance in the borough to be reported to the authority.
146. The highest by some distance in Beckenham's Copers Cope ward which contains the Beckenham town centre CIP area (109 complaints), suggesting there is a consistent noise nuisance problem here which may be linked to a small number of premises.
147. It is worth noting that the current Beckenham town centre CIP, whilst nearly all within Copers Cope ward, does include a small area of Clock House ward (around the War Memorial). There are a small number of pubs in this corner. It is also a major meeting place and a place where people walk home from pubs and bars in the town centre. Given that Clock House ward has the fourth most complaints (just ahead of Bromley TC), it may well be that there is a cumulative premises noise problem around this agglomeration of licensed premises.
148. Bromley Town ward is the fifth most complained about ward for licensed premises noise. However, Unlike Copers Cope and Clock House, there are far less residential streets surrounding Bromley town centre CIP area and its pubs and bars. Therefore, it could be that either most licensed premises in Bromley Town have been well managed from a noise perspective, or that even if there are some that do have noise issues, there are simply not enough residents nearby to generate a large number of complaints. Without observation work this is impossible to establish.

Figure 28 Noise from CONCERTS complaints by ward 2018-21

WARD	COMPLAINTS
CRYSTL	19
<b>BROMLEY TC</b>	<b>4</b>
CHIS	3
<b>COPERS COPE</b>	<b>2</b>
HAYCON	2
KELEDN	2
CLOCK	1
CRAYVW	1
DARWIN	1
BICK	0
BIGHIL	0
BROCOK	0
CHEPRB	0
CRAYVE	0
FARCRT	0
MOTCHN	0
ORPTON	0
PENCAT	0
PETSWK	0
PLASUN	0
SHORT	0
WESTWK	0
<b>Total</b>	<b>35</b>

149. Noise from concerts is much lower than the other two categories and mostly likely linked to events in Crystal Palace Park impacting on its neighbours.

## 38 Findings: Residents' survey

### 39 Background

150. In 2020, the Council undertook its annual online survey of around 1,100 residents. There are key *public safety, crime and disorder* and *public nuisance* questions within the survey. The survey returned relatively modest samples at ward level. By analysing the postcode of each anonymised respondent, it was possible to geo-locate each resident within or outside the existing CIP areas.
151. There were 38 respondents from within the Bromley Town CIP, but only 4 within the Beckenham CIP. To this end, only Bromley Town has been analysed. Even then, this number should be considered with caution as it is not robust enough to be statistically significant. However, despite the small sample, it does provide a valuable insight into how residents within the CIP feel about key issues linked to the presence of a night-time economy and the clustering of licensed premises.
152. From the survey questions that were extracted, there is a strong known link between negative behaviour and the cumulative impact of licensed venues and the night-time economy.
153. It is worth remembering that the survey results are based on respondents' feelings and experiences.\* This does not constitute actual incidents, albeit it is no less important for this. (\*Although questions in the survey do then ask why respondents felt that way and often the reason they gave their answer is that they were a victim of crime themselves or that their family was a victim).
154. It is also worth noting that the level of crime, ASB, noise etc. acceptable to many of those living in town and city centre settings is likely to be higher to those living in a quieter suburb. That is, town and city centre residents (as a cohort) are generally more prepared to put up with the negatives of living in these locations as they feel the benefits outweigh them (e.g., being close to shops and services, transport hubs, social life etc).
155. Areas where Bromley Town CIP residents felt significantly *more concerned* or *more afraid* than the borough average are highlighted in **pink**. The areas where they are significantly *less concerned* or *less afraid* are shown in **blue**.
156. Overall, there is a strong indication that, regardless of any 'urban tolerance phenomenon', residents in the Bromley Town CIP area do have more concerns and experiences of crime, ASB and public nuisance relative to the presence of a night-time economy than those in quieter areas of the borough.
157. In terms of specific findings, for those questions which are linked to the presence and clustering of night-time or licensed premises, such as, **sexual crime, robbery, begging, groups loitering** and **drug use**, residents of the Bromley Town CIP area were *more likely* than the borough as a whole to say that these crimes or nuisance were a *fairly big* or *very big* problem locally.
158. This was also true for **alcohol-related disorder** for residents within the Bromley Town Centre CIP area compared to the borough generally.

159. The only area where the borough as a whole returned more negative results than Bromley Town Centre CIP area was around feelings of safety. This may indicate the ‘urban tolerance phenomenon’ noted above.
160. (NB it is important to note that the survey does cover other crimes that are not linked to the licensed venues and the night-time economy which may also affect how respondents felt, e.g., car crime, burglary etc.)

## 40 Findings – Most serious crimes

161. Residents were asked about their experiences of the most serious crimes in their local area.

Figure 29 Bromley Town CIP residents’ experiences of most serious crimes

Crime, ASB or concern in past year	Not a problem		Not very big		Fairly big		Very big		Don't know		Total
Criminal damage - Borough	3.9%	43	34.4%	379	36.1%	398	16.9%	186	9.2%	101	1103
Criminal damage - Bromley CIP	2.6%	1	35.8%	14	34.2%	13	13.2%	5	13.2%	5	38
Robbery - Borough	2.3%	25	21.7%	240	32.5%	360	30.4%	337	13.3%	147	1107
Robbery - Bromley CIP	2.6%	1	15.8%	6	44.7%	17	23.7%	9	13.2%	5	38
Sexual related crime - Borough	7.3%	80	24.6%	271	13.0%	144	3.1%	34	52.2%	576	1104
Sexual related crime - Bromley CIP	7.9%	3	21.1%	8	18.4%	7	5.3%	2	47.4%	18	38

162. In terms of **criminal damage** there was little between Bromley Town CIP residents and the rest of the borough when it came to those saying that it was a *fairly big* or *very big* problem.
163. There was more of a difference regarding **robbery**. This is not exclusively a night-time or licensed economy cumulative impact issue but one which does have a strong correlation with these settings and customer vulnerability. Almost 70% of Bromley Town CIP respondents said they felt robbery a *fairly* or *very big* problem compared to around 63% borough-wide.
164. **Sexual-related crime** is particularly significant within the late night and licensed economy. Almost a quarter of Bromley Town CIP respondents said they felt it a *fairly* or *very big* problem compared to around 16% borough-wide.

## 41 Findings – Anti-social behaviour

165. Residents were then asked about their experiences of ASB and public nuisance in their local area. Below are the three incidents that are strongly correlated with the evening and night-time economy and the co-presence of licensed premises.

Figure 30 Bromley Town CIP residents’ experiences of ASB and nuisance

Crime, ASB or concern in past year	Not a problem		Not very big		Fairly big		Very big		Don't know		Total
Begging - Borough	15.1%	168	45.7%	508	25.2%	280	11.1%	123	3.3%	37	1112
Begging - Bromley CIP	2.6%	1	44.7%	17	18.4%	7	34.2%	13	0.0%	0	38
Groups loitering - Borough	7.2%	80	34.0%	378	34.7%	386	19.8%	220	4.5%	50	1112
Groups loitering - Bromley CIP	2.6%	1	23.7%	9	44.7%	17	26.3%	10	2.6%	1	38
Noise nuisance - Borough	25.1%	278	46.7%	518	14.6%	162	6.0%	67	8.1%	90	1110
Noise nuisance - Bromley CIP	26.3%	10	44.7%	17	15.8%	6	2.6%	1	10.5%	4	38

166. **Begging** is a particularly significant problem within the late night and licensed economy (see also CCTV data). Whilst not illegal (unless prohibited by a PSPO) aggressive begging is a significant, intimidatory and harassing practice and deters both residents and visitors from using town centres. There was a very large discrepancy between Bromley Town CIP respondents and the rest of the borough. 34% of the former said it was a *very big* problem locally compared to around 11% borough-wide.

167. **Groups loitering** is commonly associated with the evening and town centre locations, where alcohol consumption may be a significant issue, albeit they can also be an issue for residents during the day. There is clearly a significant issue in Bromley Town CIP relative to the remainder of Bromley borough given 71% said it was a *fairly* or *very big* problem compared to around 55% borough-wide.
168. There was little difference when it came to **noise nuisance** for borough-wide respondents or Bromley CIP residents specifically. This reflects the noise data findings in the previous section.

## 42 Findings – Drug use

169. Residents were then asked about their experiences of **drug use** and crime and public nuisance related to the sale and consumption of drugs in their local area. Below are the drugs-related incidents that are known to be correlated with the evening and night-time economy and the cumulative presence of certain types of licensed premises.

**Figure 31 Bromley Town CIP residents' experiences of drug use, dealing and paraphernalia**

Crime, ASB or concern in past year	Not a problem	Not very big	Fairly big	Very big	Don't know	Total					
Drug use behaviour - Borough	8.7%	96	29.8%	331	27.2%	302	14.6%	162	19.7%	219	1110
Drug use behaviour - Bromley CIP	5.3%	2	21.1%	8	28.9%	11	23.7%	9	21.1%	8	38
Drug para - cannisters - Borough	8.6%	96	29.1%	323	30.4%	338	20.2%	225	11.7%	130	1112
Drug para - cannisters - Bromley CIP	2.6%	1	28.9%	11	36.8%	14	18.4%	7	13.2%	5	38
Drug possession - Borough	7.4%	82	21.6%	239	22.1%	245	13.7%	152	35.3%	391	1109
Drug possession - Bromley CIP	5.3%	2	15.8%	6	21.1%	8	21.1%	8	36.8%	14	38
Drug use - Borough	7.29%	81	19.5%	217	26.7%	297	16.1%	179	30.3%	337	1111
Drug use - Bromley CIP	7.9%	3	15.8%	6	18.4%	7	28.9%	11	28.9%	11	38
Drug supply - Borough	7.85%	87	18.7%	207	24.3%	269	17.9%	198	31.3%	347	1108
Drug supply - Bromley CIP	5.3%	2	21.1%	8	15.8%	6	21.1%	8	36.8%	14	38

170. **General drug-use behaviour** was considered a *very big issue* for 24% of Bromley Town residents relative to 15% of borough wide respondents.
171. The rise in NOx **drug cannister** usage in the night-time economy has been a feature of the past decade with used capsules found in drainage gutters, public spaces and private gardens in or near to the centre of London's night-time economies. Whilst possibly dangerous to the user, residents in particular object to them - despite the minimal harm to them personally - because of the visual impact on their neighbourhood. Thus, their symbolic effect is greater than the inconvenience of their physical disposal. There is relatively little between the Bromley CIP residents (55%) and those across the borough (51%) saying they were *fairly big* or a *very big* problem.
172. Whilst **drug possession** is highly associated with the night-time economy and drug use around licensed premises, it is hard for locals to actually 'experience' drug possession so this should be taken with caution. However, of those who live in the Bromley Town CIP area 21% vs 14% the borough average said that drug possession was a *very big* problem.
173. **General drug use** is easier for residents to identify – given they may see it in their street or the town centre or find the paraphernalia afterwards. Of those who live in the Bromley Town CIP area, 29% vs 16% the borough average said that drug use was a *very big* problem where they lived. This is a significant finding.
174. This was also similar for **drug supply**, which resident may see taking place on street corners and alleyways in their neighbourhood. This can be linked with those users of the evening and night-time economy purchasing drugs before or during nights out. 21% of Bromley Town CIP respondents vs 18% boroughwide said it was a *very big* problem.

## 43 Findings – Alcohol misuse

175. Residents were then asked about their experiences of **alcohol** misuse and crime, as well as public nuisance related to the sale and consumption of alcohol in their local area. Below are the alcohol-related incidents that are strongly correlated with the evening and night-time economy and the co-presence of licensed premises.

**Figure 32 Bromley Town CIP residents' experiences of alcohol use and crime and public nuisance**

Crime, ASB or concern in past year	Not a problem		Not very big		Fairly big		Very big		Don't know		Total
Alcohol disorder - Borough	9.6%	106	38.6%	427	25.7%	284	9.0%	100	17.2%	190	1107
Alcohol disorder - Bromley CIP	5.3%	2	28.9%	11	39.5%	15	10.5%	4	15.8%	6	38
Street drinking - Borough	9.6%	106	38.6%	427	25.7%	284	9.0%	100	17.2%	190	1107
Street drinking - Bromley CIP	0.0%	0	52.6%	20	28.9%	11	5.3%	2	13.2%	5	38
Underage drinking - Borough	10.7%	119	33.4%	370	17.0%	189	5.5%	61	33.4%	370	1109
Underage drinking - Bromley CIP	0.0%	0	39.5%	15	18.4%	7	2.6%	1	39.5%	15	38
Underage alcohol sales - Borough	13.0%	144	27.1%	300	8.6%	95	3.2%	35	46.1%	532	1106
Underage alcohol sales - Bromley CIP	5.3%	2	28.9%	11	7.9%	3	0.0%	0	57.9%	22	38

176. In terms of the alcohol-related crime and public nuisance experiences of residents, there were only small differences between residents of Bromley Town CIP area and the borough as a whole, with the exception of **alcohol-related disorder**. This is the indicator most linked to the night-time economy and for this 50% of Bromley Town CIP respondents said it was *fairly big* or a *very big* problem compared to 35% of borough-wide respondents.

## 44 Findings – Feelings of safety

177. Residents were asked about **how safe they felt** in their local area **during the day** and **after dark**.

**Figure 33 Bromley Town CIP residents' feelings of safety**

Feelings of safety in local area	Very safe		Fairly safe		Fairly unsafe		Very unsafe		DK / don't go out		Total
When outside after dark alone - Borough	6.9%	77	47.2%	527	29.9%	334	14.3%	160	1.6%	18	1116
When outside after dark alone - Bromley CIP	15.8%	6	39.5%	15	39.5%	15	0.0%	0	5.3%	2	38
When outside in daylight alone - Borough	37.6%	420	50.5%	563	8.9%	99	2.8%	31	0.3%	3	1116
When outside daylight alone - Bromley CIP	28.9%	11	57.9%	22	13.2%	5	0.0%	0	0.0%	0	38

178. In all of the previous questions, and where there is a clear difference, Bromley Town CIP respondents said they are more likely than the borough average to experience crime and disorder and public nuisance with known links to the licensed and night-time economy. However, this is not the case for those that feel *very unsafe* when out **after dark alone** in the town. At this time of the day, Bromley Town CIP respondents feel a little *safer* than the borough as a whole.

179. Yet **during the day** Bromley Town CIP respondents also feel a little *more unsafe* than the borough as a whole.

**Figure 34 Bromley Town CIP residents' feelings of safety**

Overall crime and ASB	Much greater		Slightly greater		About same		Slightly lower		Much lower		Total
Crime compared to last year - Borough	22.6%	251	42.3%	470	33.0%	367	2.3%	25	0.2%	2	1112
Crime compared to last year - Bromley CIP	15.8%	6	34.2%	13	50.0%	19	0.0%	0	0.0%	0	38
ASB compared to last year - Borough	22.7%	251	38.4%	425	36.2%	401	2.4%	27	0.5%	5	1107
ASB compared to last year - Bromley CIP	25.6%	10	35.9%	14	38.5%	15	0.0%	0	0.0%	0	39

180. Overall, Bromley Town CIP area respondents were less likely than borough-wide respondents to say that **crime over the previous year** had got worse. This obviously covers a wide range of crimes, not just those associated with the night-time economy and licensed premises.

181. There were no significant differences within the figures for **ASB over the previous year** between Bromley Town CIP area and borough-wide respondents.

## 45 Findings: Public health

### 46 Context

182. Public Health is a statutory consultee under the Licensing Act 2003.
183. Overall, as the following data shows, across most indicators, Bromley has above London and above UK levels of alcohol harms within the community.
184. Whilst public health is not one of the four licensing objectives in England and Wales (unlike Scotland), public health are able to object to licences and respond to licensing policy.
185. This is most likely to be relevant on the basis of three of the four licensing objectives: *crime and disorder* (i.e., alcohol-related violence requiring hospital admissions) and *public safety* (fear of those who have consumed too much alcohol, for example in the street or in a domestic setting) and *protection of children from harm* (underage alcohol consumption and its negative individual health, crime and societal outcomes).
186. In the case of Bromley, there are above average figures in most alcohol indicators, particularly around children's accessing, consuming and treatment requirements for alcohol.
187. Bromley Public Health provided the following position statement on alcohol and alcohol-related harm in the borough.

### 47 Background

188. Alcohol plays an important social and economic role in society and most people who do drink enjoy alcohol without harm. However, excessive alcohol use can have a harmful effect on individuals, their families and the communities. There are huge costs to the UK economy with alcohol named as the most dangerous drug in the UK in 2009.
189. The health harms associated with alcohol consumption are widespread in every area of England, including Bromley. Nationally there are an estimated 10.4 million adults (Health Survey for England) drinking at levels that cause at least some level of risk to their health. Alcohol related harms are broad ranging and health-related problems include hypertension, cardiovascular disease, cancer, liver disease, *mental illness*, *accidents in the home and on the road*, *violence* and *premature death*. (italics those that would be considered relevant to the Licensing Act 2003 and its four licensing objectives).

### 48 Bromley Primary Care analysis

190. In 2013 GP data on the alcohol units consumed by people on the Bromley practice disease register were extracted and analysed. This analysis showed that between 2008 and 2013 38% (n=125,470) of patients in Bromley had their alcohol values recorded. These values were analysed into hazardous and harmful drinking categories. Comparisons were made between levels of deprivation using the indices of multiple deprivation (IMD) for that ward as a measure. There is no reason for us to believe that, overall, this has changed significantly since the data was collected.

191. Some of the highest rates of hazardous alcohol consumption were recorded in Orpington and Bromley Town Centre. The map below was produced to identify the hotspots of hazardous alcohol consumption.

192. Bromley Town Centre (Bromley CIP area) and Copers Cope (Beckenham CIP area) are high or above average.

Figure 35 Rates of Hazardous Drinking (per 1,000) by Bromley Ward

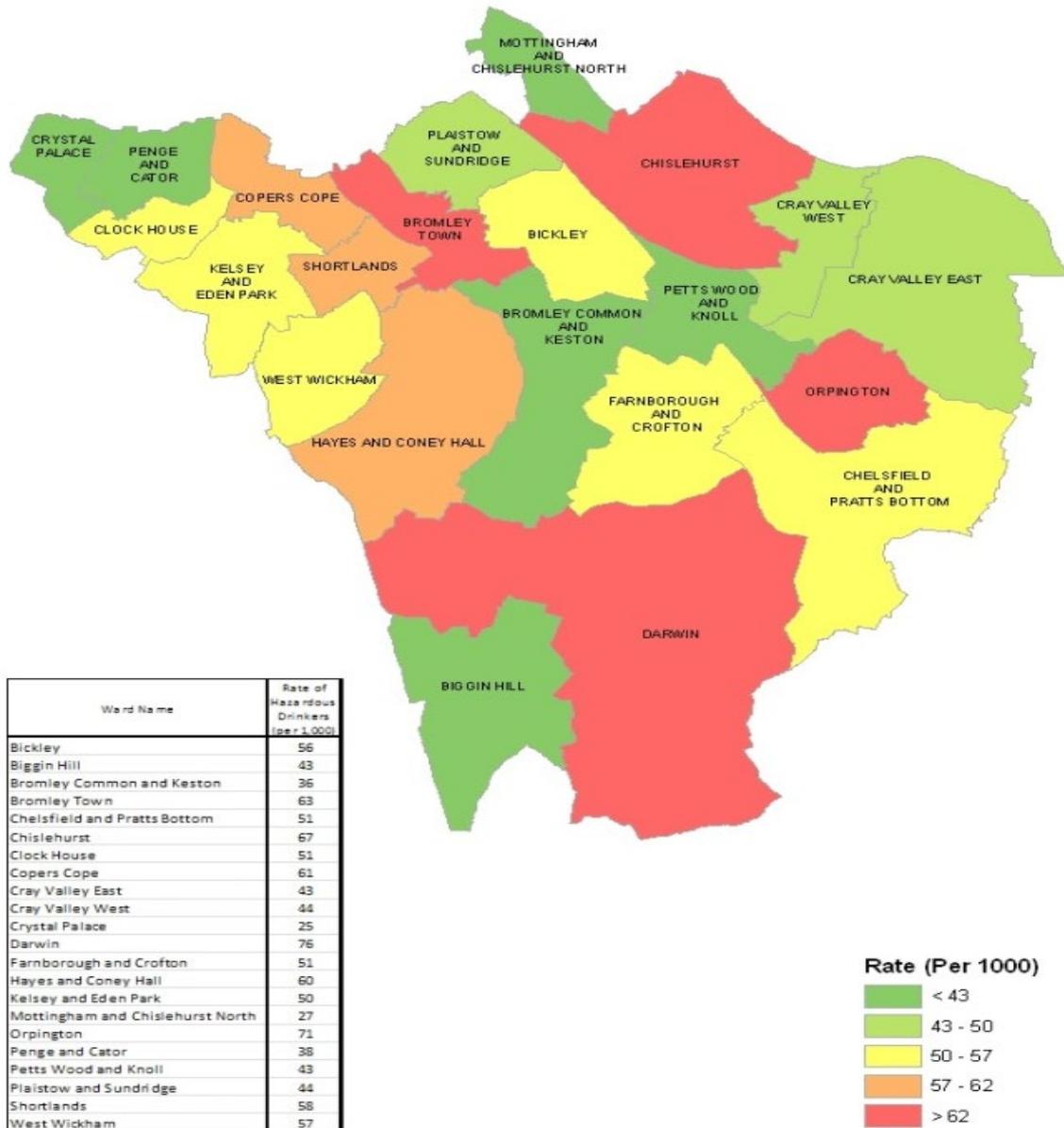
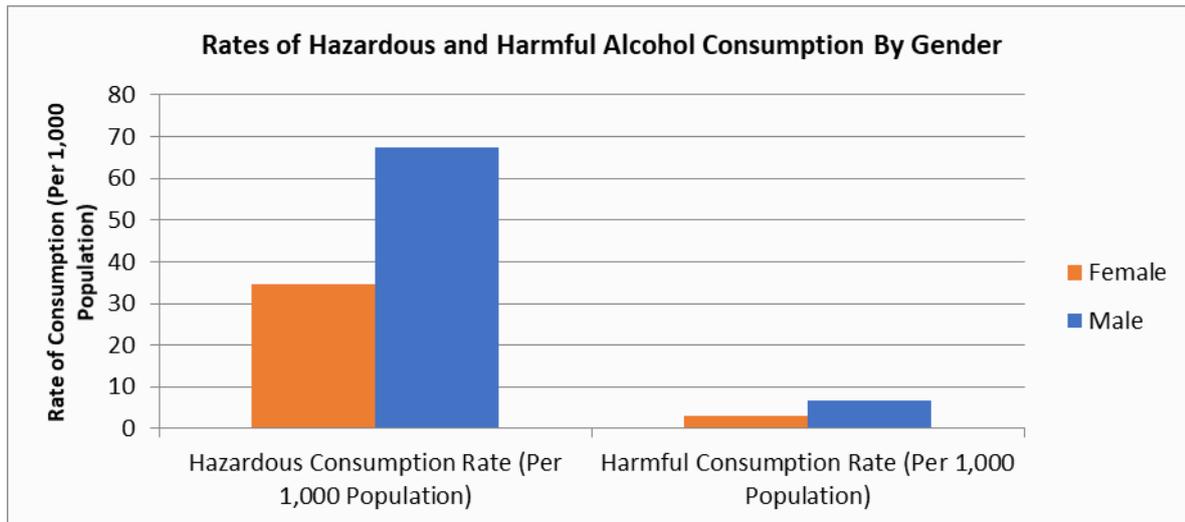


Figure 36 Rates of Hazardous and Harmful Alcohol consumption by gender, 2013



193. Hazardous drinking in Bromley affects both males and females but is particularly prevalent amongst men.

## 49 Harmful drinking

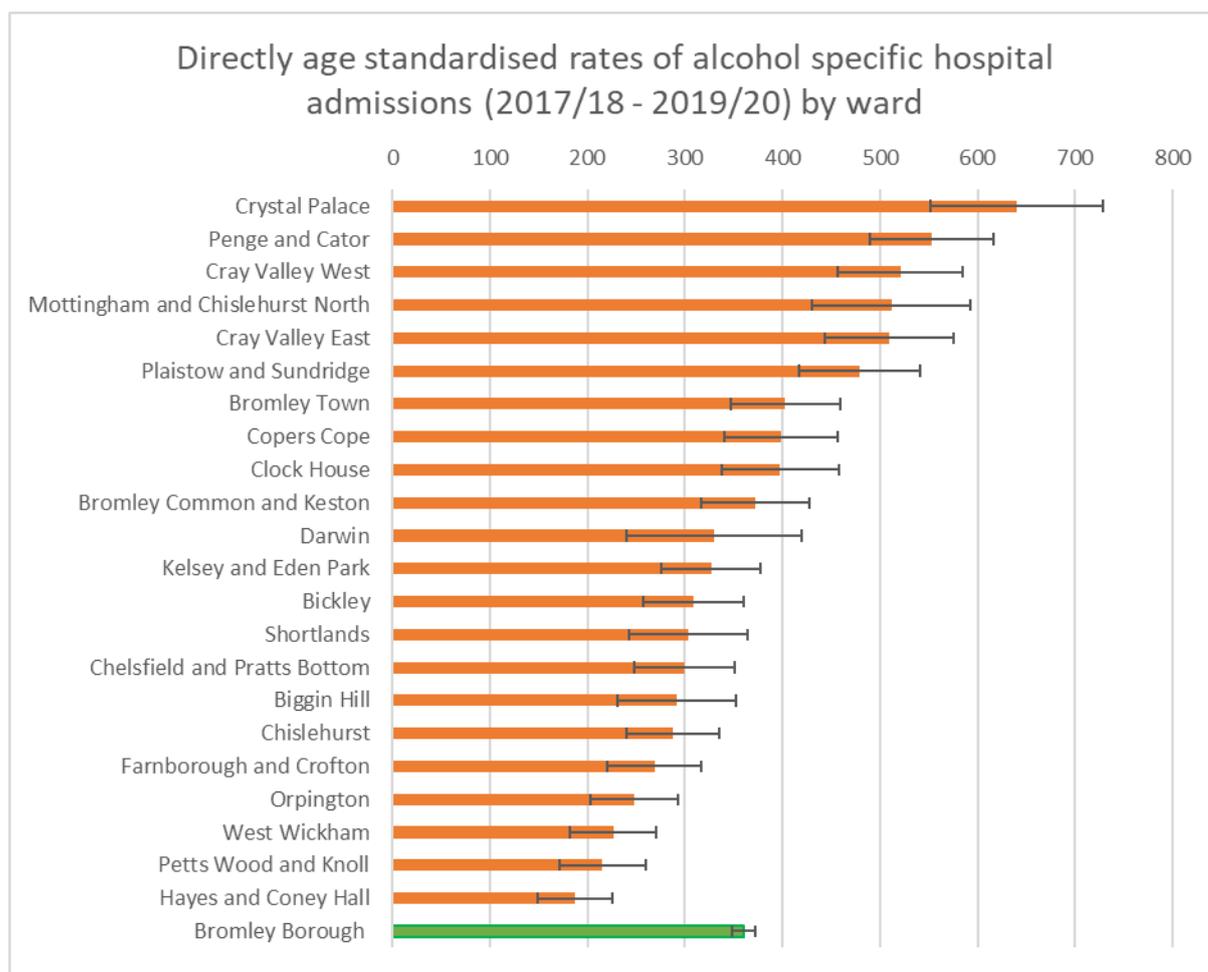
194. Alcohol-related harm is determined by the volume of alcohol consumed *and* the frequency of drinking occasions. As such, the risk of harm is directly related to levels and patterns of consumption. PHE assert that there can be a considerable lag between alcohol consumption and alcohol-related harms, particularly for chronic conditions where the lag can be many years. However, in terms of impact on violence in domestic settings and the night-time economy the role of alcohol is more immediate.

195. In January 2016 the Chief Medical Officer issued revised guidance on alcohol consumption, which advises that in order to keep to a low level of risk of alcohol-related harm, adults should drink no more than 14 units of alcohol a week. The table illustrates that in comparison to the national average, there is a higher percentage of adults in Bromley exceeding the 14-unit recommendation.

Figure 37 2011-2014 Health Survey for England data

	Bromley %	National %
Proportion of adults who abstain from drinking alcohol	12.5	15.5
Proportion of adults drinking less than 14 units per week	57	59.1
Proportion of adults drinking more than 14 units per week	30.7	25.7

Figure 38 Figure 4. HES Alcohol-specific Hospital Admissions 2017-20 by Bromley Ward



196. The above table indicates a strong relationship was between harmful drinking and deprivation.

#### References:

1. Bromley Annual Public Health Report - Burden of Alcohol Consumption (2014)
2. Health Survey for England (2015)
3. HES (Hospital Episode Statistics), NHS Digital
4. Public Health Commissioning Packs – Adult Alcohol Commissioning Support Pack (2020-21).

# Agenda Item 8

Report No.  
CSD21086

## London Borough of Bromley

### PART ONE - PUBLIC

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**Decision Maker:** Environment & Community Services PDS Committee – 1 September 2021  
Public Protection & Enforcement PDS Committee – 7 September 2021  
Renewal, Recreation & Housing PDS Committee – 8 September 2021  
Adult Care and Health PDS Committee – 9 September 2021  
Children, Education & Families PDS Committee – 14 September 2021  
General Purposes & Licensing Committee – 21 September 2021

**Date:** September 2021

**Decision Type:** Non-Urgent                      Non-Executive                      Non-Key

**Title:** TRANSFORMING BROMLEY 2019 – 2023: FIRST TWO YEARS

**Contact Officer:** Graham Walton, Democratic Services Manager  
020 8461 7743 E-mail: graham.walton@bromley.gov.uk

**Chief Officer:** Chief Executive

**Ward:** All Wards

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1. Reason for report

1.1 At its meeting on 30<sup>th</sup> June 2021 the Executive considered the attached report on the Council's Transformation Programme, and referred the report to all PDS Committees and General Purposes and Licensing Committee. The report has already been considered by Executive, Resources and Contracts PDS Committee at its meeting on 23<sup>rd</sup> June 2021.

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2. **RECOMMENDATION**

**That progress with the Transformation Programme be noted.**

## Impact on Vulnerable Adults and Children

1. Summary of Impact: The Adult Social Care and Children's Services and Education workstreams of the Transformation Programme aim to ensure that vulnerable adults and children are kept safe from harm in Bromley as part of the Transforming Bromley agenda.
- 

## Corporate Policy

1. Policy Status: Existing Policy:
  2. BBB Priority: Excellent Council:
- 

## Financial

1. Cost of proposal: Cost implications of individual transformation proposals are identified in associated reports to Members
  2. Ongoing costs: Not Applicable
  3. Budget head/performance centre: Council-wide budgets
  4. Total current budget for this head: Council-wide budgets
  5. Source of funding: Funding requirements for each proposal are identified in associated reports for decision by Members.
- 

## Personnel

1. Number of staff (current and additional): Council-wide
  2. If from existing staff resources, number of staff hours: The Transformation Project is embedded as part of business-as-usual service delivery.
- 

## Legal

1. Legal Requirement: None:
  2. Call-in: Not Applicable:
- 

## Procurement

1. Summary of Procurement Implications: The procurement implications of each transformation proposal will be identified in associated reports to Members
- 

## Customer Impact

1. Estimated number of users/beneficiaries (current and projected): The Transformation Programme will benefit all 330,000 residents in the London Borough of Bromley
- 

## Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not Applicable
2. Summary of Ward Councillors comments: Not Applicable

### 3. COMMENTARY

- 3.1 At its meeting on 30<sup>th</sup> June 2021 the Executive received an update on the progress of the Transformation Programme. The draft minute from that meeting is set out below -

#### **256 TRANSFORMING BROMLEY 2019 - 2023: FIRST TWO YEARS**

The Executive received key updates on the progress of the Transforming Bromley agenda two years into the four year Transformation Programme (2019-2023).

The report had been scrutinised by the Executive, Resources and Contracts PDS Committee on 23<sup>rd</sup> June 2021 and the Committee supported the recommendations.

**RESOLVED that the report be noted and referred to all PDS Committees and General Purposes and Licensing Committee.**

- 3.2 Committees are therefore requested to consider the aspects of the Transformation Programme that affect their portfolios.

<b>Non-Applicable Sections:</b>	See attached report
Background Documents: (Access via Contact Officer)	Transforming Bromley – Report to the Executive, 10 July 2019

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**Report No.**      **London Borough of Bromley**  
**Please obtain**  
**a report**      **PART ONE - PUBLIC**  
**number**

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**Decision Maker:**      **EXECUTIVE**

**Date:**      **30 June 2021**

**Decision Type:**      Non-Urgent                      Executive                      Non-Key

**Title:**      **TRANSFORMING BROMLEY 2019 - 2023: FIRST TWO YEARS**

**Contact Officer:**      Ade Adetosoye OBE, Chief Executive  
Tel: 020 8313 4197 E-mail: [ade.adetosoye@bromley.gov.uk](mailto:ade.adetosoye@bromley.gov.uk)

**Chief Officer:**      Ade Adetosoye OBE, Chief Executive

**Ward:**      All Wards

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1. Reason for report

This report provides the Executive with key updates on the progress of the Transforming Bromley agenda two years into the four year Transformation Programme (2019 - 2023).

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2. **RECOMMENDATION(S)**

2.1 It is recommended that the Executive:

- i) Note and comment on the report
- ii) Agree to refer the report to all PDS Committees and General Purposes and Licensing Committee.

## Impact on Vulnerable Adults and Children

1. Summary of Impact: The Adult Social Care and the Children's Services and Education workstreams of the Transformation Programme aim to ensure that vulnerable adults and children are kept safe from harm in Bromley as part of the Transforming Bromley agenda.
- 

## Corporate Policy

1. Policy Status: Existing Policy
  2. BBB Priority: Excellent Council
- 

## Financial

1. Cost of proposal: The cost implications of individual transformation proposal are identified in the associated report for decision to Members
  2. Budget head/performance centre: Council-wide budget
  3. Total current budget for this head: Council-wide
  4. Source of funding: The funding requirements for each individual transformation proposal are identified in the associated report for decision to Members.
- 

## Personnel

1. Number of staff (current and additional): Council-wide
  2. If from existing staff resources, number of staff hours: The Transformation Programme is embedded as part of business-as-usual service delivery
- 

## Legal

1. Legal Requirement: None
  2. Call-in: Not Applicable
- 

## Procurement

1. Summary of Procurement Implications: The procurement implications for each individual transformation proposal will be identified in the associated report for decision to Members.
- 

## Customer Impact

1. Estimated number of users/beneficiaries (current and projected): The Transformation Programme will benefit all 330,000 residents in the London Borough of Bromley
- 

## Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not Applicable
2. Summary of Ward Councillors comments: Not Applicable
3. **COMMENTARY**

## **Transformation Programme 2019 - 23**

- 3.1 In 2019, the Transformation Programme was launched through the Transforming Bromley Roadmap and outlined the organisation's local approach to tackling the key strategic challenges and significant funding pressures facing the local authority over the next four financial years and a projected emerging £31.7m budget gap by 2022/23. Through this programme, the Council has aimed to transform services to respond to increasing statutory responsibilities, a growing and ageing population, and a growth in demand for statutory services for those with increasingly complex needs.
- 3.2 The Transforming Bromley programme aims to ensure that the Council can continue to meet the needs and expectations of residents through enabling self-sufficiency, designing and delivering efficient services, and improving outcomes for residents at the earliest point of need within a sustainable financial envelope. A report outlining the key strategic principles of the Transformation Programme and the key workstreams went to Members in July 2019.
- 3.3 To ensure the good governance of the Transformation Programme, it is monitored on the Corporate Risk Register in line with the Council's risk management procedures. The Transformation Programme was also subject to an internal audit on its governance arrangements in January 2020 which reported 'substantial' assurance, indicating a sound system of control in place to achieve our strategic transformation objectives.
- 3.4 The Chief Executive has provided regular updates on the Transformation Programme at bi-annual scrutiny sessions since 2019. The Director of Finance has also provided key narrative updates informing how transformation savings have been built into the Medium Term Financial Strategy or else otherwise used to mitigate growth pressures and deliver savings to existing grant schemes in the draft budget reports for 2020/21 and 2021/22. Chief Officers have also provided transformation updates to their respective Portfolio Holder(s) and PDS Committees to inform the delivery of proposals.
- 3.5 Over the last 16 months, the transformation agenda has progressed despite the unexpected and highly challenging context of the Covid-19 pandemic. The Council has demonstrated its agile change management capacity to respond swiftly to residents' needs, delivering additional public health programmes and accelerating the rapid implementation of some key elements of our transformation agenda, including digitalisation. Across the Council, significant changes were quickly implemented to deliver alternative 'business as usual' and Covid-19 safe services. Our Covid-19 response has shown some of the ways forward: better use of technology, shared use of data and intelligence, better strategic decision-making, and better collaboration across services.
- 3.6 This report brings together an overview of the headline achievements during the first two years of the four year Transforming Bromley Programme, as well as the key transformation savings that have been achieved to date. It also provides the direction of travel for the next two years, including some newly identified priority projects against each of the transformation workstreams.
- 3.7 The £10.6m of transformation savings to be delivered by 2024/25 that were built into the Medium Term Financial Strategy for 2020/21 and 2021/22 as a result of transformation proposals from the first two years of the programme are also presented in this report.

### **Achievements of the first two years of the Transforming Bromley Programme**

- 3.8 The Council's Transformation Programme has taken a whole Council approach to tackling medium and long-term organisational challenges. The scope of the Transformation Programme is to deliver the objectives in the context of the following workstreams:

1. Housing, Planning, Property and Regeneration
2. Children's Services and Education
3. Adult Social Care
4. Environment and Public Protection
5. Professional Services
6. Workplace Modernisation

3.9 A summary of the key achievements of each workstream and any new priority programmes for the next two years of the Transformation Programme is provided below.

### **Housing, Planning, Property and Regeneration**

3.10 For this workstream, the Transforming Bromley Roadmap outlined the following objectives:

- Explore all options to increase the supply of affordable housing within Bromley, including permanent and temporary accommodation and within the private rented sector
- Review our initiatives to manage temporary accommodation pressures.
- Focus on early intervention and prevention to relieve housing and homelessness pressures and explore long-term regeneration activities to meet the needs of residents.

3.11 For Bromley, one of the most significant long-term cost pressures is the impact of homelessness and provision of Temporary Accommodation (TA). The Council currently supports 1,800 households in TA with just over 1,000 in costly forms of nightly paid accommodation, which places significant strain on the Council's revenue budget. The Council continues to focus on increasing supply of accommodation through housing association partners and private sector options, like many other local authorities, this supply continues to be insufficient to meet the level of need and is likely to be further challenged as a result of COVID-19 pandemic due to an increase in financial pressures on households and evictions.

3.12 The Housing, Planning, Property and Regeneration workstream has delivered the following activities in its first two years:

- Additional prevention work to reduce levels of homelessness and increase access to private rented accommodation to relieve housing pressures
- The reopening of our Housing Revenue Account (HRA) provides an additional mechanism to allow the Council to better set the rate and pace of additional affordable supply and a vehicle for the ownership of units to ensure ongoing control of affordable units. This will enable us to directly meet statutory rehousing duties and thus reduce the current cost pressures associated with costly forms of nightly rate accommodation. This will also enable the Council to access grant funding to assist in the development and acquisition of units.
- Increasing the supply of cost-effective temporary accommodation on other Bromley-owned sites
- As part of our work to increase the supply of good quality affordable housing and reduce the costs of providing temporary accommodation, we have seen the acquisition and development of properties through various schemes including an agreement with Beehive to provide 51 properties from Hyde Housing and the creation of a limited liability partnership with Orchard and Shipman for the acquisition of approximately 242 residential properties.
- Initial approval from Members has been given and planning permission approved to provide 60 units across three Council-owned sites at Burnt Ash Lane, Bushell Way and Anerley. Off-site construction works has commenced, and it is anticipated that the sites will be ready for residents in September 2021.

- Our Housing Strategy for 2019 - 29 sets out the Council's housing priorities for good quality and affordable homes to reflect housing needs. This sits alongside the Homelessness Strategy for 2018 - 23 and our Local Plan. We also drafted the Council's Regeneration Strategy for 2020 - 2030, which sets out the Council's regeneration priorities for the borough.
- Efficiency savings through better administration of the Disabled Facilities Grant provision
- Our Community Infrastructure Levy (CIL) proposals were approved for adoption by the Council in April 2021 and will come into effect on all relevant planning permissions determined on and after 15 June 2021.
- We are continuing to improve the quality of our building control services and our planning regulatory function with suitable service improvement plans in place.

3.13 We have also progressed our commitment to transform our Property Services and our ambition to move to a corporate landlord model for the strategic, effective, and efficient management of the Council's estate and assets. This is being developed through three different work programmes:

- We have agreed a clear direction of travel for the delivery of our Property and Facilities Management services going forward to ensure that we have a comprehensive approach that meets the needs of our organisation and ultimately residents now and in the future.
- The Operational Property Review has commenced to review of all of the Council's assets with a view to producing an evidence-led Operational Accommodation Strategy supported by a full financial business case and delivery plan to meet the needs of the organisation in the short, medium and longer term.
- The Disposals Programme is a programme of work to introduce a new fund management approach for the Council's investment properties and to work with Housing, Planning and Regeneration teams to ensure that we have a robust property portfolio to meet all the needs of the Council and required services.

### **Housing, Planning, Property and Regeneration: next two years**

3.14 Some of key emerging strategic priorities for the workstream over the next two years include:

#### **1. Deliver transformed Property services**

- Deliver the three workstreams to transform property services
- Reconfiguring the delivery of our Property and Facilities Management Service
- Agreeing and setting out the workplan for the Council's Accommodation Strategy to drive longer-term accommodation changes.

#### **2. Implement Economic Development agenda**

- Economic Development Strategy for 2021 - 2031 will go to Executive in June 2021 and sets out our aspirations to grow and support the local economy over the next decade
- Support Business Improvement Districts (BIDs) and ensure we utilise these functions to re-generate and grow our local economy.
- Engage with the Digitalisation Strategy to deliver infrastructure for economic recovery for businesses affected by the COVID-19 pandemic.

#### **3. Develop Bromley's Leisure Strategy**

- Critical reflection on what is Bromley's role as a leisure provider and our leisure offer

#### **4. Libraries without Walls**

- Work with GLL to develop our 'libraries without walls' virtual library offer, building on the benefits and outcomes already achieved through the COVID-19 pandemic.

#### **Adult Social Care**

- 3.15 Adults in Bromley have generally better health outcomes than the national average. Life expectancy of 81 years for males and 85 years for females exceeds national figures.
- 3.16 The Council, our health partners and providers, alongside our local community and voluntary sector, provide services for an increasing number of adults and older people with support needs. Over 750 requests for support are made each month for adults and older people's services. Over 2000 people receive packages of support in the community and high numbers of service users receive personal budgets to fund their care. Over 1500 residents live in residential care or nursing homes of which 20% are local authority funded placements.
- 3.18 For this workstream, the Transforming Bromley Roadmap outlined the following objectives:
- Modernising the social care offer and embedding strengths-based approaches and demand management in response to our sustained demographic and financial challenges.
  - Using strengths based approaches and apply principles of personalisation and co-production. Through this, we are focusing on the way we support residents to receive the right level and type of support, at the right time, to maximise their independence. This will reduce or delay their need for ongoing/or formal social care support.
  - Transforming our services by offering earlier help and prevention, enabling residents to retain and regain their independence and working closely with public, independent and voluntary sector partners to make best use of our combined resources.
- 3.19 Over the last two years, we have significantly improved partnership and collaboration with health partners, particularly in the context of the Covid-19 pandemic. During 2020, we implemented a new single point of access pathway for hospital discharges, allowing us to model pressure on adult social care services as patients have been discharged from hospital. In addition, we have restructured our services to meet the needs of our residents.
- 3.20 Since 2019, the key transformation activities across adult social care have included:
- Supporting people to remain active and independent in their communities is a key objective of our Ageing Well Strategy. We have reviewed our partnership arrangements with Bromley Well, our third sector health and wellbeing consortium provider, as part of further developing this early intervention offer. Our strategic analysis of data has supported commissioners to review priorities to sit alongside our Ageing Well strategy, our Learning Disability strategy, and our Mental Health strategy, which will deliver a renewed focus on promoting independence and wellbeing.
  - Our shared lives service, a service for adults with learning disabilities, mental health issues or other needs who cannot on live on their own and matches them with an approved carer in an adult placement, has also been developing its business plan to increase shared live placements and retention of additional carers.
  - We have launched our adult social care 'Making Practice Personal framework, in conjunction with the Social Care Institute for Excellence (SCIE), articulating our system-wide approach to working with adults in need of care, advice and support across the borough.

- Managing demand through the front door and reviewing access arrangements to adult social care services, ensuring residents are screened and signposted to appropriate services in a timely way.
- Improvements to our assessment process, ensuring timely and accurate assessment of need to enable us to work with vulnerable adults at the earliest point and reduce need for higher levels of intervention.
- Regular review of adult social care cases to ensure we are supporting people to live independently and reducing demand and expenditure for high-cost placements where achievable.
- We have undertaken strengths-based reviews of learning disability packages of support developing new working arrangements for 2021/22. We have been challenging our own traditional approach to packages of support, finding new and more creative ways of helping young people transition from children to adult social care. We have taken a similar strengths-based review approach for our older people and those with mental health support packages.
- Reviewing our commissioning arrangements for live-in care and additional 1:1 support in care homes to ensure appropriate and financially sustainable delivery of services. Our new domiciliary care services contract, awarded in September 2020 and mobilised with effect from June 2021, will ensure that the care management action, provider support and commissioning action is aligned to support the delivery of the objectives for each individual and that domiciliary care providers also work to re-able our clients.
- We have driven up the permanency rate of adult social care staff to over 80% and reducing reliance on agency and short term contracts. Our Step up to Care programme is successfully recruiting new staff into the care sector to improve recruitment and retention in adult social care.
- Delivering integration savings from health and social care, supporting people appropriately and reducing barriers to accessing high-quality services across the borough.

### 3.21 **Adult Social Care: next two years**

Some of key emerging strategic priorities for the workstream over the next two years include:

#### 1. **Working with self-funders**

- Develop programme guide for self-funders, including working with the market, improved advice, information, and guidance.

#### 2. **Broadening approach to early intervention and prevention**

- Maximising use of volunteers across a range of activities beyond social isolation
- Social prescribing
- Joint commissioning of Bromley Well through integrated care system, including key demand management analysis to assist redesign.

#### 3. **Adult Social Care digitalisation agenda**

- Work with BT to deliver a gap analysis of current digital solutions and those that could be implemented to reduce demand on statutory services.

#### 4. **Mental health services**

- Review of Section 75 agreement with incumbent provider.

## Children's Social Care and Education:

3.22 In 2019, the key priorities for children's social care and education in the Transforming Bromley Roadmap were:

- Delivery of children's services and education is sustainable and helps our children and young people at the earliest point of need.
- To review and implement a long-term sustainable approach for residential and other specialist placements for children's services and to review transition plans and service pathways.
- Explore opportunities for developing an integrated 0 – 25 service for children and young people with SEND
- Implement the SEND reforms to ensure a more consistent and graduated range of SEND provision in Bromley.

3.23 Over the last two years, Bromley has seen a 24% increase of referrals coming into Children's Social Care. Many of these families have never been known to the Council before and the nature of some of these referrals are complex and high risk. As at March 2021, we had 335 children looked after in Bromley.

3.24 Early intervention and prevention is vital to work with families at the earliest point and reduce the likelihood of children and families requiring ongoing long-term statutory service support and thus improving their life outcomes. Over 97,505 contacts received support and services through our Children and Family Centres in 2019/20. Despite the Covid-19 pandemic, we have still seen 6,559 contacts through our centres and around 2,726 children and their families have received support through the Bromley Children's Project through our ability to provide

3.25 Alongside this, our SEN service in Bromley has, like local authorities across England, seen a sustained increase in requests for Education, Health and Care (EHC) needs assessments, EHC Plans and specialist placements, which is impacting on the availability of placements.. The number of EHC Plans has increased to 2,984 in March 2021, which represents a 17% increase, which looks likely to continue in the future alongside national trends. There is an increase in EHC Plans for children and young people with complex issues; challenging behaviours, complex mental health, childhood trauma/neglect and social communication,

3.26 Since 2019, the key transformation activities and achievements across children's social care have included:

- Our Staying Together service has been established to help children and young people at risk of entering care to stay with their families through intensive support to identify workable solutions to meet both the needs of the young person and the parent or carer (or care provider). The service worked with 40 children which resulted in only two children coming into care. The Service is now starting to move to support the Youth Offending Service to work with young people to prevent them coming into the service.
- The Council has joined the West London Alliance (WLA) in order to ensure that it has a wider and better range of high quality placements to offer our children, achieving better value for money through increased negotiating power as a result of joining the alliance. Transformation savings of £390k have been delivered from 2021/22.
- We are also working to achieve better value for money for our placements outside the WLA through renegotiating our terms with independent foster carer agencies and reducing cost through block booking placements.

- Enhancing our children's contact centre service offer and generating income by extending hours and remit at two of our centres (Royston and the Saxon Centre), which will allow supervised visits to accommodate both the Council and private clients through gaining NACC accreditation.
- Delivering efficiency savings by diverting children and young people from independent foster agency placements and better using our 3 retained emergency foster placements. To date we have placed 37 children through this scheme which has resulted in better outcomes for children in our care.
- Our children's social care service had 80 - 85% permanent staff which represents a significant improvement on our position in previous years. We continue to promote frontline staff into senior management roles in children's services through 'grow your own' and 'talent spotting' schemes.

3.27 Our key transformation activities across education services have included:

- Officers have transformed communications with schools and the early years sector through the development of the Education Matters website. This has provided an efficient vehicle for communications, document exchange, guidance and training opportunities with Bromley schools, early years providers and other partners. In addition to our communications portal, the service has also procured a system to support the management of the early years funding processes.
- We are delivering a sustained approach to earlier intervention, improving inclusion and appropriate support and challenge to deliver efficiency savings through reviewing our alternative provision services and our support services to children and young people with SEMH (Social, Emotional & Mental Health) needs. This has delivered a whole system change and the commissioning of a secondary vocational provision that has enabled the service to reduce the level of exclusions of children which has in turn assisted the service to not only contain significant budget pressures but more importantly provided better outcomes for our children and young people and their education.
- Reviewing the SEN transport policy and delivering efficiencies through the expansion of the in-house independent travel training team.
- The SEN service carried out a review of SEN Placements to seek to reduce the costs of placements through commissioning additional local provision, reducing costly out of borough or independent provision, and reviewing funding bands for Bromley special schools and additional resourced provisions. We are also undertaking a review of our SEN place planning and our current funding processes to enable the Council to be more sustainable now and in the future in its placement provision that meets the needs of our children.
- Bromley's adult education service continues to explore income generation, efficiencies and invest to save opportunities to enhance the quality of our learning offer. We have invested in technology and IT to enhance our online provision and develop creative and innovative ways of learning across all subject areas. We are advertising the use of classrooms for rent when they are not in use to support local people in a safe environment. We are also looking to pilot an intensive programme of learning for learners with learning difficulties and disabilities in addition to launching new full cost recovery courses such as professional bookkeeping and cookery courses.
- As part of the Local London Partnership, Bromley is one of nine boroughs that have submitted an application for funding for the Parental Employment Programme, working with children and family centres and family learning programmes to provide support for parents to find flexible working arrangements and access to childcare support, as well as support parents in work with career progression opportunities.

## Children's Social Care and Education: next two years

3.28 Some of key emerging strategic priorities for the workstream over the next two years include:

1. **Children Social Care digitalisation programme**

Work with BT to deliver a gap analysis of current digital solutions and those that could be implemented to reduce demand on statutory services.

2. **0-25 Service offer**

Continue scoping exercise underway with a view to bringing forward a workplan for implementation over the next 2 years.

3. **Enhancing of Youth Services**

Undertake service review

4. **Use of Children's Centres**

Working with the Accommodation Strategy leads to diversify the use of children's centres outside of normal operating hours.

## Environment and Public Protection

3.29 Bromley is London's largest borough by geographical area, covering 58 square miles, with 7,000 acres of green space, over 100,000 plotted trees and around 560 hectares of woodland, including 45 conservation areas. Bromley maintains over 128 parks which are highly valued by our residents for their benefits to good health and wellbeing. With around 330,000 residents, we are also responsible for a vast portfolio of services including the management of all the borough's waste and recycling requirements including more than 35,000 green garden waste collections. We maintain and clean 3,700 footways and 2,900 carriageways, combat fly tipping and ensure Bromley's street scene is kept to a good standard. The Council also works well with its Friends Groups, with over 4000 Snow Friends in 426 Snow Friend groups and over 1,500 Street Friends and 49 active Friends of Parks Groups with over 3,500 members.

3.30 Our Public Protection and Enforcement team leads on the delivery of the Council's individual and coordinated activity to ensure that Bromley continues to be a safe and healthy place to live, visit and work. The service spans Food Safety, Licensing, Trading Standards and Enforcement activities.

3.31 Our transformation priorities for environment and public protection services included:

- Reviewing the feasibility of various transport-related initiatives
- Delivering a more sustainable waste management approach by promoting recycling, composting, and reducing landfill waste
- Reviewing highway services, including long term funding arrangements for road resurfacing

3.32 Our strategic transformation priorities have further developed over the last two years to respond to emerging programmes including the Council's commitment to achieve net zero carbon emission by 2029 through our carbon management, as well as the Council's ongoing commitment to tackling poor air quality. We also recently established our first Green Recovery Board to tackle longer term environmental challenges for the local area.

3.33 Our key transformation activities and achievements have included:

- Significant reductions in the use of off-site storage through a digitalisation project has also delivered efficiency savings through our Information Management Strategy. This has coincided with the upgrade of the SharePoint platform to enable officers to effectively manage digitalised documents.
- Agreement to proceed with enforcement of moving traffic contraventions, which is expected to start later in 2021.
- Our Automatic Number Plate Recognition (ANPR) parking approach in the Civic Centre car park is delivering efficiency savings
- The invest-to-save programme to upgrade 4000 street lights has been completed and it is expected to deliver both future savings and contribute to the Council's pledge to have net zero carbon emissions by 2029.
- We have adopted a five-year Air Quality Action Plan for the borough to ensure that while Bromley continues to be the least polluted of all London boroughs, we can continue to make progress in mitigating the impact of poor air quality, including the adverse health impacts associated with air pollution
- Pedestrian and cycling improvements and tree planting schemes which will encourage walking and cycling and enhance the local environment.
- We continue to make significant progress against our Food Safety Service Plan, which sets out the Council's annual plan for effective enforcement of food safety legislation.
- We are undertaking a review of our Woodland Strategy to support biodiversity and to assist with meeting our net zero carbon target.
- The Safer Bromley Partnership Strategy went to Members for approval in July 2020. Four key priorities will be tackling burglary, domestic violence, non-domestic violence with injury and anti-social behaviour.
- We are developing a local information network regarding substance misuse in working with the Safer Bromley Partnership.
- The Public Protection Enforcement policy was adopted in February 2020. It aims to ensure that the public, the regulated community and other stakeholders know what to expect from the services within public protection.

### **Environment and Public Protection: next two years**

3.34 Some of key emerging strategic priorities for the workstream over the next two years include:

1. **Carbon reduction and air quality plans to deliver Council's net zero ambitions**
2. **Green Energy plan including cross-cutting proposals with other departments.**
3. **Review of three main environmental contracts**  
Opportunity for further efficiency savings through life of contract
4. **Departmental structure review**  
Ongoing review to ensure structure is fit for purpose
5. **Link to Regeneration Strategy**  
Ensuring synergy between work of the department and the Regeneration Strategy to meet future needs

## Professional Services

- 3.35 In Bromley, our professional services include our enabling strategic and back office functions in the Council, such as Finance, HR, Legal, Corporate Procurement, Performance Management, Customer Services, Commissioning and Contracts, and our business support. Some of our professional services also includes direct service delivery to residents of the borough e.g. housing benefit assessments and payments. Frontline services and managers rely on these professional services for support and challenge to maximise organisational performance. The size of our support function is influenced by a number of factors, including cost, business delivery model (e.g. in-house, shared services or commissioned), organisational culture, the level of centralised or decentralised professional functions and technology.
- 3.36 The Professional Services transformation workstream set out to identify any potential opportunities for efficiency in the delivery of these service, ensuring that our services are fit-for-purpose and provide sufficient, capacity, skills, knowledge and experience available to the Council to deliver our priorities for the future.
- 3.37 During the pandemic, procurement services provided flexible advice adapting to challenges and varying contract arrangements where required. The pandemic also saw temporary easements to in-person committee meetings.
- 3.38 Our key transformation activities and achievements in this area have included:
- Delivering a significant corporate restructure and key efficiencies by establishing a streamlined corporate leadership team in September 2019 with five operational directors to lead the delivery of two front lines departments (People and Place) and three corporate directors to oversee central business functions through the Chief Executive's department and provide oversight to our professional services. At divisional level, the Directors have carried out further staffing and service realignment to deliver local efficiencies.
  - All professional services underwent a service review, ensuring that capacity and skills were fit for purpose in all areas. A business case to increase capacity in the legal department funded through a commercial model has ensured additional and specialist capacity to support housing and social care departments.
  - All departments have worked to deliver a 3% vacancy factor to ensure efficiencies where possible and COE agreed the approach for all contract managers to find between 2% and 5% efficiencies across all contracts at the point of review.
  - A new 'umbrella' contract to appoint agency staff was procured to ensure the Council had access to the right short-term skills and experience. The new contract allows for a streamlined process to manage and appoint staff, delivering better value for money.
  - Efficiencies to our staff training budgets to ensure value for money in our spending.
  - The retendering of the new Exchequer Services contract includes housing benefit assessments and payments with enhanced services and an increased scope to better meet the needs for residents.

### Professional Services: next two years

- 3.39 Some of key emerging strategic priorities for the workstream over the next two years include:
1. **Ongoing review of Professional Services**
    - Continued assessment to ensure that back office functions are fit for purpose including ongoing capacity risk assessments delivering services with lean professional services.

- Support and challenge of business cases to ensure the right capacity, skills and knowledge is available to support statutory front line BAU and transformation.
2. **Liberata ‘Preventative Service Model’**
    - Deliver a proposals report to Liberata outlining the work programme to be delivered over the contract term, including four key elements: Going Digital Programme, Intelligence Automation, Digital Analytics Programme and the move towards an enhanced Single Financial Assessment Service and monitor through this workstream.
  3. **Cashless Council**
    - Conduct research to consider the feasibility of becoming a ‘cashless council’ and develop a business case for 2022/23 to progress within the regulatory parameters if feasible.
  4. **Outsourced Contracts**
    - Directors to review existing outsourced contracts where required to ensure the best method of service delivery and costs benefits. Where external contracts already exist, Directors to look for opportunities to further extend roles and responsibility.

## **Workforce Modernisation**

- 3.40 Our Workplace Modernisation workstream has been the driver for delivering a modern working environment for our council offices. Before the pandemic, our Civic Centre campus could accommodate up to 1000 staff working on site during any working day, hardwired into the network on desktop computers.
- 3.41 The workstream is responsible for delivering a new Civic Centre campus office accommodation, driving our IT transformation programme and enhanced digital approach to service delivery, and our cultural change programme that enable a smarter and more flexible working environment to enhance staff wellbeing, productivity and retention. Enabling and empowering staff to identify the best ways of working within their services underpins our bottom line of delivering services within a sustainable financial envelope.
- 3.42 The COVID-19 pandemic has significantly affected this workstream perhaps more than others. It has informed critical reflection on our Civic Centre accommodation strategy business case and designs to reflect the potential for a more hybrid style of office working in the future. IT colleagues have sped up significant elements of our Information Management, IT and Digital strategies and we have begun the internal conversations with managers and their staff on striking the right balance between smarter working, employee wellbeing and ensuring high-quality delivery of services.
- 3.43 Since 2019, the Workforce Modernisation programme has delivered the following achievements:
- As up to 90% of staff have been working at home during the COVID-19 pandemic, we expedited the delivery of the IT strategy by rolling out over 1400 laptops in a COVID-19 safe manner from April to August 2020. This rollout included the migration to our Windows 10 operating platform, our move to Office 365 and the rollout of Microsoft Teams to further enable home working.
  - At the back end of our IT services, we upgraded our data centre infrastructure and improved network connectivity with new wireless connections across our sites. Work has also started on the new SharePoint intranet site - an initial version went live in May 2021

and will be finalised by October 2021, allowing for smarter working whilst managing information in line with best practice.

- Our digital vision for the future of Council services has been informed by the Digital Innovation Conference, held virtually in November 2020, which will inform our new Digital Strategy that is due to be published in 2021. Our experience during the pandemic, moving many of our services quickly online to support residents and staff during the pandemic, has shown the potential for a digital first approach to services. Moving forward, we are reflecting on what our new model of service should look like. How much of this 'channel shift' we should retain.
- Our transformative work with our IT provider has received national recognition as Bromley was shortlisted for the Public/Private Partnership award category of the 2020 Local Government Chronicle (LGC) Awards for IT partnership with BT.

3.44 We have also made significant progress on our cultural change agenda, led by Human Resources, to promote our organisational REAL values (respect, empower, ambition and learning). We recognise that our transformation agenda can only be achieved if we take staff on this journey with us and we engage in regular and open dialogue on how our organisational values can drive more efficient services and better outcomes for our residents.

- We rolled out our first two-day all staff conference in November 2019, engaging our staff in important dialogue about our Transformation Programme, our Digital Strategy and our culture change programme.
- We have held a series of thematic discussions on our corporate REAL values and will be re-launching our Bromley 'Values and Behaviours' competency framework in summer 2021, setting out desired skills and behaviours of managers and staff.
- We have improved our online HR toolkit and corporate and departmental workforce induction programmes to ensure that new starters are able to feel connected to the organisation in a hybrid working environment.
- Our learning and developing training offer during the pandemic has focused on personal mental and physical wellbeing responding to feedback from staff about the isolation of working from home.

3.45 To ensure that we were able to support our staff effectively, we have rolled out two COVID-19 staff wellbeing surveys, one in May 2020 and again in January 2021 to ensure that we were able to support staff to work effectively from home while also assessing their general wellbeing.

3.46 Some of the key headlines that will affect our transformation agenda going forward include:

- By January 2021, 96% of staff expressed confidence in working from home with their new technology.
- Only 7% of our staff want to work in the office full time, with 78% preferring a hybrid approach and 15% wishing to work remotely full time. Identified benefits to remote working include efficiency and better productivity while working from home, flexibility, no commute time, and better work/life balance. On the other hand, other staff have identified benefits to office working, including greater contact with colleagues, combatting loneliness, better workplace collaboration, and a more distinguished divide between work and home. We hope that a hybrid approach will draw out the benefits of both home and office-based working for the vast majority of our staff.

### **Workforce Modernisation: next two years**

3.47 Some of key emerging strategic priorities for the workstream over the next two years include:

**1. Redefine the Civic Centre Accommodation strategy**

- Considering 'post Covid' change in behaviour patterns and ways of working, including the potential use of outposts reflections of service hubs and geography.

**2. Implementation of Digital Strategy**

- Digital-led approach to service delivery, supporting long term challenges regarding managing demand and enhancing user experience for residents
- Work programme to outline individual projects and providing separate invest-to-save business cases for any activities where funding is required and identified return on investment, in addition to ensuring co-funding opportunities are explored.

**3. Re-procure IT Contract to meet new and emerging needs of Council**

This re-procurement exercise will include the new normal impact on IT support requirements, ensuring that the service is fit-for-purpose now and in the future. The scoping work will take place in 2021/22 with the new contract due to go live in December 2023.

**4. Refresh of the external website**

Ongoing programme of work to ensure a user interface that is more customer friendly that drives the delivery of services with a single resident account linking into the work under the Council's Digital Strategy and other areas of work under this programme including Liberata's Preventative Model.

**5. Information management and enabling smarter working**

Through the roll out of the Council's new SharePoint system with the first phase due to go live in May 2021 and the rest to be completed by October 2021, we hope to improve communication, access to information and collaboration across the organisation and our partners.

**Financial savings from the first two years of the Transformation Programme**

3.48 The Transformation Programme has so far identified and built in over £10.6m in transformation savings into the Council's Medium Term Financial Strategy (MTFS) that will be delivered by 2024/25. The table below provides an overview of the savings built into the 2020/21 MTFS and the 2021/22 MTFS, which are also provided.

	Savings				
Transformation Programme 2019 - 2023	2020/21 (£'000)	2021/22 (£'000)	2022/23 (£'000)	2023/24 (£'000)	2024/25 (£'000)
Estimated total savings (net)	-4,096	-7,723	-10,141	-10,532	-10,608

3.49 Alongside these savings, some additional transformation savings have been earmarked to mitigate growth and this is included in the tables below for clarity. Where investments have been required to deliver transformation savings, this is also noted in the MTFS.

**TRANSFORMATION INCLUDED WITHIN THE 2020/21 MTFS**

Transformation Board	Proposal	Savings			
		2020/21 (£'000)	2021/22 (£'000)	2022/23 (£'000)	2023/24 (£'000)
<b>Housing Phase 1: Immediate Measures</b>	Further increasing level of homelessness prevention and access to private rented accommodation to prevent/relieve housing pressures - additional prevention work	0	-85	-241	-397
<b>Housing Phase 2: Increasing the supply of cost effective temporary accommodation.</b>	York Rise Modular provision Phase 1 - Tender Process				
	Phase 2 – Implementation Phase	-286	-568	-568	-568
	<b>Included in the mitigation in the MTFS</b>	286	568	568	568
	250 additional TA units on Bromley-owned sites through modular construction	-800	-1,600	-1,600	-1,600
<b>Housing Phase 3: Property Acquisitions</b>	Property acquisition partner - delivery of up to 400 units	0	-780	-2,340	-2,600
	<b>Included in the mitigation in the MTFS</b>	0	780	2,340	2,600
<b>Housing Phase 4: Realignment and ongoing supply</b>	Realignment and profiling of existing TA portfolio and reduction of bad debt provision.	-250	-500	-500	-500
	<b>Managing demand through the front door</b> More timely response for our Service Users Reduce the need for additional staff Reduce the cost of care packages Provide effective help without need for long term assistance Increase short term interventions within the community Reduction in LD Transition costs	-55	-55	-55	-55
<b>ASC - Assessment</b>	Meet the Council Statutory requirements with appropriate assessment forms More timely response for our Service Users Reduce the need for additional staff Reduce the cost of care packages Reduction of double handed care packages	-369	-369	-369	-369
	<b>ASC - Review</b> Ensuring we are supporting people to live independently Dealing with poor performing providers Reduction in the number of placements costing over the maximum rate Reduce the long term reliance on S.117 Ensure that the appropriate funding in place Reduce the level of 1:1 packages	-132	-132	-132	-132
<b>ASC - Commissioning</b>	Appropriate and Financial sustainable delivery of services	-68	-68	-136	-136
<b>ASC - Workforce</b>	Robust well trained and suitably qualified work force Reduction in the number of agency staff Increase in the number of permanent staff Decrease reliance on agency and short term contracts Reduction in dependency and over-provision of care Higher staff retention Reduction in the cost of staffing Driving Change	-167	-167	-167	-167
	<b>Children's Social Care</b> Placement demand LAC <b>Investment required for above</b> Phase 1 WLA Framework LAC Placements West London Alliance Placements other than WLA <b>Included in the mitigation in the MTFS</b>	-320 100 -150 -400 500	-320 100 -390 -800 750	-320 100 -390 -800 750	-320 100 -390 -800 750
<b>Traffic and parking</b>	Car Parks - Car Washing Facilities	-19	-19	-19	-19
	Car Parks - Advertising in the car parks	-18	-18	-18	-18
<b>Accommodation</b>	Delivery of accommodation strategy: Saving opportunities from rationalisation of meeting rooms, office space and 70/30 occupancy ratio Reduction in the use of off-site storage			-40	-40
<b>Financial services</b>	Exchequer Services Contract phase 1	-678	-678	-678	-678
<b>HR</b>	Review of agency staff to permanent staff	-14	-14	-14	-14
<b>Senior leadership review and savings</b>	Realignment of current leadership structure	-971	-971	-971	-1,000
	3% vacancy factor	-1,785	-1,785	-1,785	-1,785
	<b>Already included in the mitigation in the MTFS</b>	1,500	1,500	1,500	1,500
	<b>Estimated total savings (net)</b>	<b>-4,096</b>	<b>-5,621</b>	<b>-5,885</b>	<b>-6,070</b>

<b>TRANSFORMATION INCLUDED WITHIN THE 2021/22 MTFS</b>					
<b>Transformation Board</b>	<b>Proposal</b>	<b>2021/22 (£'000)</b>	<b>2022/23 (£'000)</b>	<b>2023/24 (£'000)</b>	<b>2024/25 (£'000)</b>
Housing, Planning and Regeneration	<b>DFG Funding and Administration of the DFG provision</b>	-200	-200	-200	-200
Children's Services	Emergency Foster Placement	-26	-105	-184	-263
Children's Services	Contact Centres	-64	-104	-104	-104
Children's Services	Transport Services Policy	-111	-248	-298	-298
Children's Services	Adult Education	-49	-48	-35	-32
Environment and Public Protection	Enforcement of Moving Traffic Contraventions	-1,173	-2,969	-3,059	-3,059
Environment and Public Protection	Car Parks - ANPR solution in the Civic Offices car park	-29	-29	-29	-29
Professional Services	Review of Training Budgets	-50	-50	-50	-50
Professional Services	Staff realignment	-200	-200	-200	-200
Professional Services	Retendering	0	-103	-103	-103
Professional Services	Retendering	-200	-200	-200	-200
		<b>-2,102</b>	<b>-4,256</b>	<b>-4,462</b>	<b>-4,538</b>

## Next steps

3.50 To continue the ongoing oversight of the Transformation Programme, the following next steps are recommended:

1. That the Executive refer the Transforming Bromley 2019 - 2023: first two years report to all PDS Committee and General Purposes and Licensing Committee for review and comment
2. Ongoing oversight through the Chief Executive's scrutiny sessions bi-annually at Executive, Resources and Contract PDS Committee
3. Regular reporting by Chief Officers at their respective PDS Committees on the progress of the newly emerging and ongoing priorities for the second half of the Transforming Bromley programme

## 4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

4.1 The Adult Social Care and the Children's Services and Education workstreams of the Transformation Programme aim to ensure that vulnerable adults and children are kept safe from harm in Bromley as part of the Transforming Bromley agenda.

## 5. POLICY IMPLICATIONS

5.1 Through the work of the Transformation Programme, there will be proposals for Member decision that will require a policy decision. These individual proposals will be developed in consultation with Members to enable effective decision making.

## 6. FINANCIAL IMPLICATIONS

6.1 Through the work of the Transformation Programme, there will be transformation proposals with financial implications as part of the work to reduce the emerging budget gap. Each Transformation Programme workstream has a finance lead supporting the development of

transformation proposals. Consequently, each individual proposal will outline cost implications for Members in order to enable effective decision making.

## **7. PERSONNEL IMPLICATIONS**

- 7.1 The Professional Services workstream of the Transformation Programme will look at professional services supporting both service departments and corporate functions, including looking at staffing capacity in the organisation. Each of the Transformation Programme workstreams has a HR lead supporting the development of transformation proposals. Each individual proposal will outline HR implications for Members in order to enable effective decision making.

## **8. LEGAL IMPLICATIONS**

- 8.1 Each of the Transformation Programme workstreams has a Legal Services lead supporting the development of transformation proposals. Each individual proposal will outline legal implications for Members in order to enable effective decision making.

## **9. PROCUREMENT IMPLICATIONS**

- 9.1 Through the work of the Transformation Programme, each Transformation Programme workstream will have the support of a Corporate Procurement lead to develop transformation proposals. The procurement implications for each individual transformation proposal will be identified in the associated report for decision to Members

<b>Non-Applicable Sections:</b>	
Background Documents: (Access via Contact Officer)	Transforming Bromley - Executive, 10 July 2019

Report No.  
CSD21099

## London Borough of Bromley

### PART ONE - PUBLIC

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**Decision Maker:** GENERAL PURPOSES AND LICENSING COMMITTEE

**Date:** Tuesday 21 September 2021

**Decision Type:** Non-Urgent Non-Executive Non-Key

**Title:** REVIEW OF THE SCHEME OF DELEGATION TO OFFICERS

**Contact Officer:** Graham Walton, Democratic Services Manager  
Tel: 0208 461 7743 E-mail: graham.walton@bromley.gov.uk

**Chief Officer:** Ade Adetosoye OBE, Chief Executive

**Ward:** All

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1. Reason for report

- 1.1 At its last meeting on 6<sup>th</sup> July 2021, the Committee established a Working Group to conduct a review of the Scheme of Delegation to Officers. The Working Group has met and has made recommendations to this Committee proposing that priority should be given to a complete re-draft of the Scheme.

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2. **RECOMMENDATION**

**Members are requested to consider the recommendations from the Working Group that the current Scheme of Delegation is not fit for purpose and should be re-drafted, and that additional funding should be provided if necessary to enable this additional work to be carried out.**

### Impact on Vulnerable Adults and Children

1. Summary of Impact: Not Applicable
- 

### Corporate Policy

1. Policy Status: Existing Policy:
  2. BBB Priority: Excellent Council
- 

### Financial

1. Cost of proposal: Estimated Cost: Up to £15,000
  2. Ongoing costs: Non-Recurring Cost:
  3. Budget head/performance centre: Democratic Services
  4. Total current budget for this head: £366k
  5. Source of funding: Revenue budget 2021/22 Central Contingency
- 

### Personnel

1. Number of staff (current and additional): 6 (6.67fte)
  2. If from existing staff resources, number of staff hours: Not applicable
- 

### Legal

1. Legal Requirement: Statutory Requirement:
  2. Call-in: Not Applicable: Non-executive matters are not subject to call-in.
- 

### Procurement

1. Summary of Procurement Implications: Not Applicable
- 

### Customer Impact

1. Estimated number of users/beneficiaries (current and projected): Not Applicable
- 

### Ward Councillor Views

1. Have Ward Councillors been asked for comments? No
2. Summary of Ward Councillors comments: Not Applicable

### 3. COMMENTARY

- 3.1 The Scheme of Delegation to Officers enables the smooth running of all Council services by setting out the legal basis for actions carried out by officers on behalf of the Council. All local authorities will have such a document, although the format and content of each authority's scheme may vary considerably. The Scheme is of necessity a lengthy and detailed document, a working reference document rather than a guide to services.
- 3.2 In 2012, Bromley's Scheme was updated to clarify whether matters were delegated from the Council, or from the Leader (essentially, whether actions were non-executive or executive) in response to the Localism Act 2011. The changes enabled the Council to continue with a single scheme. The impact of the Localism Act is that the majority of delegations are controlled personally by the Leader of the Council, and therefore cannot be changed by this Committee or even by full Council. If this Committee wishes to make changes to the Scheme it will need to seek the agreement of the Leader.
- 3.3 Other than the changes required by the Localism Act, Bromley's scheme has remained largely the same for many years, excepting occasion updates as legislation or Council structures have changed, usually by way of an annual review authorised by the Council's annual meeting.
- 3.4 At the last annual Council meeting on 19<sup>th</sup> May 2021 some concerns about the Scheme raised by two Members. As a result, this Committee considered a report at its meeting on 6<sup>th</sup> July 2021 setting out the legal context of the Scheme, and addressing five specific issues of concern from the annual meeting. One of these issues requires a small update to the Scheme.
- 3.5 The Committee concluded that the Scheme should be looked at in more detail and set up a Working Group – this comprised Councillors Stephen Wells (Chairman), Simon Fawthrop, Melanie Stevens and Angela Wilkins. The Working Group met on 7<sup>th</sup> September 2021, and compared Bromley's Scheme with that of other Councils, in particular LB Sutton and LB Bexley. The Working Group concluded that the current Bromley Scheme was not fit for purpose, and that a new Scheme should be drawn up based on the format of the LB Bexley scheme. The Working Group also made a number of comments on the desirable characteristics of a new scheme –
- The Scheme should follow a consistent and logical format and structure.
  - The Scheme should be more user-friendly, so that it is easier to find out who is responsible for each function.
  - The columns in the Scheme should be reversed, to put the column containing whether the power was delegated from the Council or the Leader first, followed by the column for who the power was delegated to. The Scheme would also need an extra column for the portfolio, if the current arrangement by portfolio was abandoned.
  - Each function should be tied into the relevant legislation wherever possible.
  - The Scheme should be clearer about how delegations can be withdrawn, scrutinised and called in.
  - The Scheme should require officers to inform ward members about decisions affecting their wards.
  - The Scheme should include more details about financial limits (although this is already covered in the Financial Regulations.)

- The limits of officer power should be more clearly delineated.
- The Scheme should be easy to keep updated.

The Working Group recognised that this would be a considerable piece of work to undertake, for which internal resources were not likely to be available. They therefore suggested that consideration be given to instructing an external consultant to draw up a new scheme.

#### 4. FINANCIAL IMPLICATIONS

- 4.1 The cost of commissioning external support to draw up a new scheme of delegation is estimated to be up to £15,000. Although there is no specific budget provision for this, officers will seek to manage within the existing Democratic Services revenue budget in 2021/22. In the event that this is not possible, the Executive will be requested to approve a drawdown from Central Contingency of up to £15,000.

#### 5. PERSONNEL IMPLICATIONS

- 5.1 The Scheme of Delegation forms part of the Council’s Constitution and is administered by the Democratic Services Team. There is limited scope for the Team to give priority to a substantial re-write of the Scheme of Delegation.

#### 5. LEGAL IMPLICATIONS

- 6.1 The main power to delegate non-executive functions is set out in section 101 of the Local Government Act 1972. Section 9E of the Localism Act 2011 sets out the present position on executive delegations. The statutory provisions allow onward delegation in most cases – to sub-committees and to officers. Certain functions cannot be delegated, such as appointing the Mayor and setting the Council’s budget, and some functions can only be carried out by particular parts of the Council – such as certain licensing functions. In addition, a small number of matters - some staffing matters and surveillance authorisation under the Regulation of Investigatory Powers Act (RIPA) - are reserved by law to officers.

<b>Non-Applicable Sections:</b>	Impact on Vulnerable Adults and Children, Policy, Procurement
Background Documents: (Access via Contact Officer)	Scheme of Delegation to Officers – May 2021

Report No.  
CSD21087

## London Borough of Bromley

### PART ONE - PUBLIC

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**Decision Maker:** GENERAL PURPOSES AND LICENSING COMMITTEE

**Date:** 21 September 2021

**Decision Type:** Non-Urgent                      Non-Executive                      Non-Key

**Title:** WORK PROGRAMME AND MATTERS ARISING

**Contact Officer:** Graham Walton, Democratic Services Manager  
Tel: 0208 461 7743    E-mail: graham.walton@bromley.gov.uk

**Chief Officer:** Mark Bowen, Director of Corporate Services

**Ward:** All

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1. Reason for report

- 1.1 This report summarises the Committee's work programme for the 2021/22 Council year. This report also covers matters outstanding from previous meetings.
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2. **RECOMMENDATION**

**Members are requested to consider and note the matters outstanding from previous meetings (paragraph 3.5) and their draft work programme for 2021/22.**

### Impact on Vulnerable Adults and Children

1. Summary of Impact: Not Applicable
- 

### Corporate Policy

1. Policy Status: Existing Policy:
  2. BBB Priority: Excellent Council:
- 

### Financial

1. Cost of proposal: No Cost
  2. Ongoing costs: Not Applicable
  3. Budget head/performance centre: Democratic Services
  4. Total current budget for this head: £366k
  5. Source of funding: Revenue Budget
- 

### Personnel

1. Number of staff (current and additional): 7 (6.67fte)
  2. If from existing staff resources, number of staff hours: Not Applicable
- 

### Legal

1. Legal Requirement: None:
  2. Call-in: Not Applicable: This report does not involve an executive decision.
- 

### Procurement

1. Summary of Procurement Implications: Not Applicable
- 

### Customer Impact

1. Estimated number of users/beneficiaries (current and projected): Not applicable
- 

### Ward Councillor Views

1. Have Ward Councillors been asked for comments? No
2. Summary of Ward Councillors comments: Not Applicable

### 3. COMMENTARY

- 3.1 Bromley Council operates under a “Leader and Executive” constitutional model, with most decision making functions resting with the Leader, Portfolio Holders and the Executive. However, there are a number of functions which the executive side is prohibited from dealing with, for which Committees need to be appointed. In Bromley, the majority of these “non-executive” functions are the responsibility of Development Control Committee for town planning and related functions, and this Committee for most other non-executive functions.
- 3.2 General Purposes and Licensing Committee fulfils the role of Licensing Committee under the 2003 Licensing Act (which requires a membership of between ten and fifteen), but also deals with a range of other non-executive functions that cannot be dealt with by the Executive or do not fall within the terms of reference of Development Control Committee, the Pensions Committee or the Standards Committee. It therefore has a range of varied and sometimes unrelated responsibilities, including audit, human resources, complaints, elections and appointments.
- 3.3 The Committee’s role is very different to that of a PDS Committee, in that it has decision-making powers, many of which are delegated to a number of sub-committees -
- Appeals Sub-Committee
  - Audit Sub-Committee
  - Industrial Relations Sub-Committee
  - Licensing Sub-Committee
  - Local Joint Consultative Committee
  - Rights of Way Sub-Committee

These sub-committees have decision-making powers within their own terms of reference, and in some cases only meet when issues arise that require a decision from Members.

- 3.4 The Committee has six scheduled meetings in the year, plus a meeting after the Council’s annual meeting to appoint its Sub-Committees. The meetings for the 2021/22 Council year are set out in Appendix A, with the reports anticipated for each meeting.
- 3.5 Members are asked to note the following matters outstanding from previous meetings –

#### Minute 157 – 1 June 2021 (Appointments to Outside Bodies 2021/22)

Following the appointments made by the Committee, a small number of vacancies remain unfilled –

- Community Links Bromley (x1)
- Cray Valley War Memorial Hall (x2)

The three-year appointment to the Diocese of Rochester Board of Education is due to be considered at the meeting on 30<sup>th</sup> November 2021.

#### Minute 170 – 6 July 2021 (Review of the Scheme of Delegation to Officers)

Members set up a working group to review the Scheme of Delegation to Officers. The Working Group consists of Councillors Stephen Wells (Chairman), Simon Fawthrop, Melanie Stevens and Angela Wilkins and met on 7<sup>th</sup> September.

<b>Non-Applicable Sections:</b>	Impact on vulnerable adults and children/Policy/Financial/Personnel/Legal/Procurement
Background Documents: (Access via Contact Officer)	None

**General Purposes and Licensing Committee**  
**Work Programme 2021/22**

**19<sup>th</sup> May 2021** *(following annual Council meeting)*

Appointment of Sub-Committees

**1 June 2021**

Appointments to Outside Bodies

Work Programme & Matters Outstanding

**6<sup>th</sup> July 2021**

Audit of 2019/20 Financial Statements

Review of Meeting Arrangements

Scheme of Delegation to Officers

Work Programme & Matters Outstanding

*(meeting to be followed with a briefing on Licensing issues)*

**21<sup>st</sup> September 2021**

Review of GLA Election 2021

Annual Complaints Report and Annual Ombudsman's Letter 2020/21

Amendment to the Statement of Licensing Policy – Cumulative Impact Assessment

Transforming Bromley 2019-23: The first Two Years

Scheme of Delegation to Officers

Work Programme & Matters Outstanding

**30th November 2021**

Member Support, IT and Induction - 2022

Teachers Pay Policy - Centrally Based Staff

Appointments to Outside Bodies

Work Programme & Matters Outstanding

**8<sup>th</sup> February 2022**

Pay Policy Statement 2022/23

Members Allowances 2022/23

Programme of Meetings 2022/23

Work Programme & Matters Outstanding

**29<sup>th</sup> March 2022**

Executive Assistants Reports 2021/22

Annual Review of Licensing Activity

Annual Review of the Scheme of Delegation to Officers

Work Programme & Matters Outstanding

*A report will be presented on the Audit of Financial Statements for and 2020/21 – date to be confirmed.*

*Draft Minutes from Sub-Committee meetings are received for information at each meeting.*

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## **AUDIT SUB-COMMITTEE**

Minutes of the meeting held at 7.00 pm on 8 June 2021

### **Present:**

Councillor Neil Reddin FCCA (Chairman)  
Councillor Robert Evans (Vice-Chairman)  
Councillors Gareth Allatt, Simon Fawthrop, Tony Owen,  
Stephen Wells and Angela Wilkins

### **Also Present:**

Sara Bowrey—Director of Housing, Planning and  
Regeneration

### **71 APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTE MEMBERS**

There were no apologies for absence and the Chairman welcomed Councillor Wilkins and Councillor Fawthrop to the Committee.

### **72 DECLARATIONS OF INTEREST**

Councillor Fawthrop declared an interest with respect to the item on the Corporate Risk Register regarding IT failure. This was because he worked for British Telecom; he commented that he did not believe his interest was prejudicial and the Chairman agreed.

Councillor Evans declared an interest as a Governor at Saint Olave's School.

Councillor Wells declared an interest as he sat on the Court of St Olave's and was a Governor of St Saviour's School. He declared a further interest in that his wife ran a company which had been in receipt of government grants via Bromley Council.

### **73 CONFIRMATION OF THE MINUTES OF THE MEETING HELD ON 9th MARCH 2021 (EXCLUDING THOSE CONTAINING EXEMPT INFORMATION)**

A Member made a comment concerning the previous minutes with respect to updating the profile of the Committee. She asked where the reports of the Audit Sub-Committee went to. She referred to the issue of time spent working on Covid related work. She had been told that this had had no impact on the normal work undertaken by officers. She felt that this was clearly not the case and asked for an update concerning this. The Chairman commented that reports could be referred onward by the Committee itself and it was further noted that the reports of the Audit Sub Committee were published.

A Member stated that in his view, reports should go to the relevant PDS Committee for scrutiny. The Chairman commented that the Committee could be reporting to Full Council in the future if the profile of the Committee was elevated.

**RESOLVED that the minutes of the meeting held on 9<sup>th</sup> March be agreed as a correct record.**

**74 QUESTIONS TO THE AUDIT SUB COMMITTEE**

No questions had been received.

**75 MATTERS OUTSTANDING--PART 1**

**CSD 21066**

The previous year's audit fee had been arbitrated by the PSAA (Public Sector Audit Appointments) after being challenged by the Director of Finance; the fee had subsequently been reduced from £219k to £199k. The fee for the current year was still being challenged by the Director of Finance. It was clarified that the £199k fee related to the year 2018/19.

A discussion took place to explain why the recommendations for the Leavers' process had been closed off despite what had been recorded as 'limited assurance.'

**RESOLVED that the Matters Outstanding report be noted.**

**76 QUESTIONS ON THE AUDIT REPORTS PUBLISHED ON THE COUNCIL WEBSITE**

No questions were received regarding the published audit reports on the Council's website.

**77 ANNUAL GOVERNANCE STATEMENT 2020/21**

**FSD21031**

The Head of Audit and Assurance summarised the report.

A review was required annually of the Council's control and governance practices—this had to be compared with the relevant local government framework. In drafting the AGS (Annual Governance Statement), relevant officers from across the Council had been consulted—these included the CLT, Monitoring Officer, Democratic Services Manager, Risk Management Group and the Director of Finance.

The main significant governance issues arising in the AGS were:

- Finance
- Valuation of Fixed Assets
- Impact of Covid 19 on service delivery

Members noted this was a comprehensive document that outlined much good practice. Key documents were referenced at the back of the AGS. The AGS would be examined by the External Auditors. The Committee was informed that the AGS had to be signed off by the Leader and the Chief Executive.

The Chairman asked if it had ever been the case that any problems had arisen after the External Auditors had looked at the AGS. The Head of Audit and Assurance replied that LBB had not experienced any issues in this regard.

A Member referred to the arrangements for meetings that were resolved by the Urgency Committee when the pandemic first started. She said that it had been promised that these arrangements would be reviewed in June 2020, but that this had not been the case. She further expressed concern that no mention was made of the increased spending limits granted to the Leader of the Council at that time. The Head of Audit and Assurance responded that as the document was still in draft form it could be amended if required.

A Member commented on the issue of procurement and said that it was unfortunate that the report was silent with respect to tenders and bids under £50k. He understood that the Council looked at cumulative totals as well as individual elements. The Member referred to the matter of what the report referred to as 'continuing to reduce bureaucratic burdens'. He wondered if this was actually taking place and if so it would be good to include examples in the report.

A Member referred to the fact that the Council's accounts had not been signed off for a few years. In his view, there did not seem to be enough urgency in resolving this matter, which he felt needed to be expedited as soon as possible. It was not good for the reputational image of the Council to have no value for money assessment for three consecutive years.

A discussion took place around the issue and the protocols followed with respect to whistle blowing. The Head of Audit and Assurance commented that in some cases it would be appropriate for him to discuss whistle-blowing issues with the Monitoring Officer and with the Director of Finance. It would not always be appropriate to report back to the whistle-blower, if the matter related to another individual, but in some cases it was appropriate to report back to the manager of the relevant service. The Member asked what the Head of Audit and Assurance would do if he was unhappy with how whistle blowing information was dealt with. The Head of Audit and Assurance stated that the relevant regulations allowed him to have access to the Chair of the Audit Sub-Committee as well as the Chief Executive if required. Generally, appropriate action was taken and there would be no sweeping of issues under the carpet.

The Committee discussed the matter of senior people who had previously worked for the Council in LBB's planning section and then subsequently were employed in the private sector as planning agents. Public perception could be that this person may have undue influence and so perhaps stricter protocols concerning such matters should be considered. The Head of Audit and Assurance said that this was a matter he could discuss with the Monitoring Officer.

A Member expressed the view that £2.75m of public money had been wasted, with respect to the development of the Crofton Road Cycle Lane. He said that the local residents had been 'up in arms' about this development. He disputed the fact that the development had been undertaken based on clear evidence and enquired as to what Members could do if they felt that public money had been wasted--as they no longer had access to a District Auditor. It was noted that in this case the matter had been 'called in'. The Head of Audit and Assurance responded that if it was an issue with due process then the matter could be referred to the Monitoring Officer. He clarified that whilst the District Auditor or the Audit Commission no longer existed, the equivalent rights existed where matters could be referred by electors to the External Auditor.

A Member enquired as to where she could make complaints with respect to planning issues. She said that she had in the past referred matters with respect to planning to the Standards Committee, but in her view the responses were unsatisfactory. She wondered if the Audit Sub-Committee could draft a report on the governance procedures that related to the Standards Committee. She highlighted the fact that after the Planning Advisory Service Review of 2019, it had been suggested that changes be made to some of the governance procedures around planning.

As a result of this review, some changes were made with respect to the governance process around planning, including the fact that now if a Member called in a planning application, the planning reason for the 'call in' had to be supplied. The Member expressed the view that in addition, the name of the Member who called in the application should be published with the agenda papers. She commented on the perceived undue influence that staff leaving the Council (after working in Planning) and then being re-employed in the private sector as a planning agent could seem to have.

A Member wondered (with respect to the Crofton Cycle Lane) if objectors could submit an objection to the accounts if they felt that the project was not value for money. The Head of Audit and Assurance responded that any resident could exercise their democratic rights and raise objections to the accounts, these would then be looked at by the External Auditors; obviously the relevant grounds would need to be established for any objections to be taken seriously.

**RESOLVED that**

**1) The Committee noted the comments made with respect to the Annual Governance Statement and the Committee agreed the Statement.**

**2) The Head of Audit and Assurance would discuss the matter of former senior members of the Planning Department leaving the Council and working in the private sector as Planning Agents with the Director of Corporate Services.**

**3) The Head of Audit and Assurance noted comments made by the Committee and he would amend the draft AGS if he felt that this was appropriate.**

**78 ANNUAL INTERNAL AUDIT REPORT 2020/21**

**FSD21030**

This was a summary of work undertaken in the last year. Covid 19 had significantly impacted on the Internal Audit Team directly, with some of the team being allocated to other duties and those remaining provided assurance on Covid 19 work streams. This was in addition to the impact on services due to be audited.

Much of the work of the Internal Audit Team had been directed towards Covid related functions and dealing with the various government grants that were due to be allocated to businesses. The Internal Audit Team were involved in providing advice on setting up the processes required so that the various grants could be paid out quickly, effectively and with the minimum amount of fraud. This work had been unremitting. The work undertaken was therefore different in style to previous years, with more assurance being provided in real time.

Things had been different over the course of the last year and Internal Audit (in order to ensure they had sufficient evidence for their annual opinion) had sought signed assurances from Directors that their Departments were following the relevant rules and regulations. Assurances had also been sought by Internal Audit from what was termed as the Council's 'second line of defence' functions which included departments such as Legal, Health and Safety, IT, various performance management teams, Safeguarding and Complaints.

Internal Audit was due to have an external assessment on themselves by an audit team from another council, but this had to be abandoned because of Covid and had now been scheduled for quarter four of next year. It was planned that the LBB Internal Audit Team would undertake a review of the London Borough of Hackney's internal audit function in 2023 to 2024.

The Head of Audit and Assurance expressed the view that after an analysis of the quality and effectiveness of Internal Audit, he was confident that the service generally conformed with the Public Sector Internal Audit Standards.

The Internal Audit Team was looking at the use of rotation of assignments and at updating the risk register with respect to fraud related risks. Going forward, new checklists would be introduced and considered before new audits were undertaken.

The Head of Audit and Assurance confirmed that there had been no threats/interference to the scope or objectivity concerning the work undertaken by Internal Audit. He confirmed that overall, LBB had an adequate and effective framework of governance, risk management and a sound system of control.

At this point the Committee moved briefly into the Part 2 section of the meeting to discuss issues relating to cyber security. (The details of this discussion will be found in the Part 2 Minutes).

The Committee was provided with a brief update concerning the finalising of the Council's accounts for 2019/20 and 2020/21.

A brief discussion took place with respect to the matter of fixed assets. The comment was made that no one really knew what they were worth (until the point of sale) and what was the risk to LBB of a bad valuation. The Head of Audit and Assurance commented that in his view, a different valuation created by a different methodology was not in itself a high risk to the Council. Different companies used different methodologies. It was noted that other local authorities were experiencing similar issues. However, it was important that the accounts were considered to be accurate and reliable.

A discussion took place concerning the resourcing of the Internal Audit Team and the additional £30k funding that had been allocated to them to buy in expertise from Mazars. It was noted that they would be used by Internal Audit to catch up on a backlog of work.

At this point the Committee moved back into Part 2 to discuss further matters with respect to cyber security.

**RESOLVED that**

- 1) The Annual Internal Audit Report be noted.**
- 2) The Committee notes the opinion of the Head of Audit and Assurance that the overall internal control environment within the London Borough of Bromley is sound.**

## **79 INTERNAL AUDIT PROGRESS REPORT**

### **FSD21029**

The Committee was informed that Internal Audit was nearing the end of dealing with restart grants. Staff dealing with the ARG grants were being given training and access to the NFI database to carry out the required checks around grant payments. For the next Committee, it was likely that reports would follow regarding GDPR, Creditors and Housing Benefit. An update was provided regarding the Leavers' process, which was a matter that had previously been referred to the Chief Executive. A Team was leading on this issue and it was now the case that the recommendations had been mostly implemented.

Members were updated regarding the follow up audit for St Olave's School. Most of the previous recommendations had now been implemented and so the assurance level had been raised from 'Limited' to 'Reasonable'. Internal Audit had noted some issues around the way that contracts had been procured in that in some cases it seemed that there had been inadequate planning and preparation before going out to tender.

It was noted that one duplicate claim had been spotted during the audit of the Troubled Families Claim.

An update was provided with respect to the follow up audit concerning Highways. There had previously been three priority one recommendations, one of which had been implemented and two of which still needed to be followed up and addressed. The Internal Audit Team had sought documented proof that the other two priority one recommendations were being implemented. As at the date of the meeting, this confirmation had not been uploaded to the system and so those remaining recommendations were still not able to be closed. It was acknowledged that one of the key officers involved with respect to Highways had been required to oversee responsibility for the Vaccination Centre. The Head of Audit and Assurance stated that a follow up report with respect to Highways would be presented at the next meeting of the Committee.

Members received an update concerning risk management and it was noted that all of the Council's risk registers for all of the relevant departments and portfolios had been incorporated into the agenda papers. The risk management process had been operating well remotely.

The Committee was briefed concerning waivers, and the relevant data concerning waivers had been incorporated into the agenda pack; this had been produced by the Assistant Director for Governance and Contracts.

An update was provided with respect to the Redmond Review and it was noted that the Government had decided not to establish a new oversight body. Instead, a new body was already in the process of being established and this was the Audit Reporting and Governance Authority.

This authority was going to replace the Financial Reporting Council and would now include the additional responsibilities relating to local government audit.

Regarding the Leavers' process, a Member asked if any deficiencies in this regard had had an adverse effect on the pension fund or on pay. The Head of Audit and Assurance responded that the people who had left the employment of the Council had been notified to HR and as far as he was aware there had been no adverse effect on the pension fund or on pay. The deficiencies in the Leavers' process had more to do with the return of IT equipment, phones and purchasing cards and removing access to systems. It was noted that in the future there would be an audit of payments and pension and this would be considered.

At this point two announcements were made. The first announcement was that this would be Councillor Reddin's last year as a Councillor and as the Chairman of the Audit Sub Committee. The second announcement was that the Head of Audit and Assurance (Mr. David Hogan) was planning to retire. He had agreed with the Director of Finance to stay on until a replacement was found and a handover was completed. The Chairman and the Committee expressed their many thanks to Mr Hogan for his excellent work for the Council and the Committee.

**RESOLVED that:**

- 1) The Internal Audit Progress report be noted.**
- 2) The Internal Audit reports published on the Council's website be noted.**

**80 LOCAL GOVERNMENT ACT 1972 AS AMENDED BY THE LOCAL GOVERNMENT (ACCESS TO INFORMATION) (VARIATION) ORDER 2006 AND THE FREEDOM OF INFORMATION ACT 2000**

**RESOLVED that the press and public be excluded during consideration of the items of business listed below as it was likely in view of the nature of the business to be transacted or the nature of the proceedings, that if members of the press and public were present, there would be disclosure to them of exempt information.**

**81 INTERNAL AUDIT FRAUD, INVESTIGATION AND EXEMPT ITEMS REPORT**

As this report detailed matters that were deemed to be of a confidential nature, then the minutes for this part of the meeting are detailed in full in the Part 2 (confidential) minutes.

**82 MATTERS OUTSTANDING--PART 2**

As this report detailed matters that were deemed to be of a confidential nature, then the minutes for this part of the meeting are detailed in full in the Part 2 (confidential) minutes.

**83 EXEMPT MINUTES OF THE MEETING HELD ON 9th MARCH 2021**

The Part 2 minutes of the meeting held on 9<sup>th</sup> March 2021 were agreed as a correct record.

The meeting ended at 9.30 pm

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By virtue of paragraph(s) 7 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

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