



CABINET

7.30 pm	Wednesday 13 September 2023	Council Chamber - Town Hall
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Members 9: Quorum 3

Councillor Ray Morgon (Leader of the Council), Chairman

	Cabinet Member responsibility:
Councillor Keith Darvill	Lead Member for Climate Change
Councillor Gillian Ford	Lead Member for Adults and Health
Councillor Oscar Ford	Lead Member for Children and Young People
Councillor Paul McGeary	Lead Member for Housing
Councillor Paul Middleton	Lead Member for Corporate, Culture and Leisure Services
Councillor Barry Mugglestone	Lead Member for Environment
Councillor Christopher Wilkins	Lead Member for Finance and Transformation
Councillor Graham Williamson	Lead Member for Development and Regeneration

Zena Smith
Head of Committee and Election Services

**For information about the meeting please contact:
Bernadette Lynch tel: 01708 434849
e-mail: bernadette.lynch@haverling.gov.uk**



**Please note that this meeting will be webcast.
Members of the public who do not wish to appear
in the webcast will be able to sit in the balcony,
which is not in camera range.**

Under the Committee Procedure Rules within the Council's Constitution the Chairman of the meeting may exercise the powers conferred upon the Mayor in relation to the conduct of full Council meetings. As such, should any member of the public interrupt proceedings, the Chairman will warn the person concerned. If they continue to interrupt, the Chairman will order their removal from the meeting room and may adjourn the meeting while this takes place.

Excessive noise and talking should also be kept to a minimum whilst the meeting is in progress in order that the scheduled business may proceed as planned.

Protocol for members of the public wishing to report on meetings of the London Borough of Havering

Members of the public are entitled to report on meetings of Council, Committees and Cabinet, except in circumstances where the public have been excluded as permitted by law.

Reporting means: -

- filming, photographing or making an audio recording of the proceedings of the meeting;
- using any other means for enabling persons not present to see or hear proceedings at a meeting as it takes place or later; or
- reporting or providing commentary on proceedings at a meeting, orally or in writing, so that the report or commentary is available as the meeting takes place or later if the person is not present.

Anyone present at a meeting as it takes place is not permitted to carry out an oral commentary or report. This is to prevent the business of the meeting being disrupted.

Anyone attending a meeting is asked to advise Democratic Services staff on 01708 433076 that they wish to report on the meeting and how they wish to do so. This is to enable employees to guide anyone choosing to report on proceedings to an appropriate place from which to be able to report effectively.

Members of the public are asked to remain seated throughout the meeting as standing up and walking around could distract from the business in hand.

DECLARING INTERESTS FLOWCHART – QUESTIONS TO ASK YOURSELF



AGENDA

1 ANNOUNCEMENTS

On behalf of the Chairman, there will be an announcement about the arrangements in case of fire or other events that might require the meeting room or building's evacuation.

2 APOLOGIES FOR ABSENCE

Apologies received from Councillor Graham Williamson

3 DISCLOSURES OF INTEREST

Members are invited to disclose any interests in any of the items on the agenda at this point of the meeting. Members may still disclose an interest in an item at any time prior to the consideration of the matter.

4 MINUTES (Pages 1 - 6)

To approve as a correct record, the minutes of the meeting held on **9th August 2023**, and to authorise the Chairman to sign them.

5 ADVERTISING AND SPONSORSHIP POLICY (Pages 7 - 52)

6 HOME TO SCHOOL TRANSPORT POLICY (Pages 53 - 64)

7 REPORT FROM PEOPLE OSSC ADULT PROVISIONS TOPIC GROUP (Pages 65 - 110)



MINUTES OF A CABINET MEETING
Council Chamber - Town Hall
Wednesday, 9 August 2023
(7.30 - 8.17 pm)

Present:

Councillor Ray Morgon (Leader of the Council), Chairman

Councillor Gillian Ford

Councillor Oscar Ford

Councillor Paul Middleton

Councillor Barry Mugglestone

Councillor Christopher Wilkins

Cabinet Member responsibility:

Lead Member for Adults and Health

Lead Member for Children and
Young People

Lead Member for Corporate, Culture
and Leisure Services

Lead Member for Environment

Lead Member for Finance and
Transformation

106 ANNOUNCEMENTS

Members were advised of the Fire Safety procedures in the Council Chamber.

107 APOLOGIES FOR ABSENCE

Apologies received from Councillor Paul McGeary and Councillor Keith Darvill.

Cllr Graham Williamson also sent apologies, but attended via the video conference facility to present a report.

108 DISCLOSURES OF INTEREST

There were no disclosures of interests.

109 MINUTES

The minutes of the meeting held on **19th July 2023**, were agreed as a correct record and the Chair signed them.

110 **ALL AGE CARERS STRATEGY**

Carer's Strategy 2023-2026. A strategy for those of all ages who provide informal and unpaid care in Havering.

The report was introduced by **Councillor Gillian Ford**, Cabinet Member for Health and Adult Care Services.

The Carer's Strategy focusses on unpaid Carers (those who provide unpaid and informal care to their friends or family) who provide invaluable support for loved ones and friends on a daily basis. The recent Covid Pandemic further highlighted the significant role that they play in supporting people to remain well at home. They coordinate care and appointments, provide personal care, and improve the wellbeing of those they look after. It is important that health, care and the community and voluntary sector support unpaid carers to continue to provide the invaluable tasks that they carry out every day. They often however don't recognise that they are performing this crucial function as a 'carer'. 2021 Census data suggests up to one in ten people in Havering provide informal and unpaid care on a regular basis.

In the context of the developing Havering Place based Partnership, which brings together health, care and the community and voluntary sector in Havering with a focus on integrating services and support for local people in a way that is meaningful to them, partners in Havering have jointly undertaken a refresh of the strategy for informal and unpaid carers, to ensure that we deliver improved experiences and outcomes in the Borough.

The Cabinet **approved** the implementation of the Carer's Strategy 2023-2026.

111 **SITE DISPOSALS UNDER THE ASSET DISPOSAL PROGRAMME 2022-2028**

Site Disposals under the Asset Disposal Programme 2022-2028

The report was introduced by **Councillor Graham Williamson** (via zoom) – Cabinet Member for Development and Regeneration

This report follows on from the Cabinet decision of 8th February 2023, which adopted a medium-term asset disposal programme to provide a sustainable asset pipeline to deliver capital receipts as an integral part of the Council's wider Capital Strategy.

The February decision noted that the disposal of the car park sites reported was provisional and subject to public consultation relating to modification of Traffic Management Orders relating to the sites. The Cabinet agreed to make a final decision on the disposal of the car park sites after considering the outcome of the consultation. In addition, the report noted that further reports would follow seeking approval for disposal of specific assets within the disposal programme.

This report seeks to report the outcome of the consultation to inform the Cabinet decision to authorise disposal of the car park sites. It also seeks to declare additional assets surplus to operational requirement and obtain authority for their disposal.

Site Disposals under the Asset Disposal Programme 2022-2028

Cabinet **agreed** the recommendations below:

- **Confirmed** authority to the Assistant Director Housing, Property and Assets to dispose the following assets having considered the outcome of a statutory consultation relating to the removal of the car parks from the Council's off street parking, modification of Traffic Management Orders and pursuant to the Cabinet decision of 8 February 2023:
 - Como Street Car Park, RM7 7DN
 - Keswick Avenue Car Park, RM11 1XR
 - Dorrington Gardens Car Park, RM12 4HX
 - Angel Way Multi-storey Car Park, RM1 1HR
- **Noted** that the potential disposal of Slaney Road car park will be the subject of further appraisal to consider the potential retention of part of the existing site
- **Noted** that in the exercise of delegated authority, any disposal to Mercury Land Holdings would be subject to the terms for any interim lease-back of operational assets and/or subsequent buy-back of assets not subsequently progressed by Mercury Land Holdings, as set out in the previous report to Cabinet on 8th February 2023.
- **Declared** the following assets as surplus to the Council's operational requirements:
 - Mercury House, 11 Western Rd, Romford, RM1 3RL
 - Gays Field, Jubilee Close, Romford, RM7 9LU
 - Land at Bedale Road/Tiverton Road, Harold Hill, RM3 9TU
- **Delegated** authority to the Assistant Director Housing, Property and Assets in consultation with the Deputy Director of Legal and Democratic Services to appropriate the Group Homes at 79/ 81 Maybank Avenue, Hornchurch, RM12 5SH from the General Fund to the Housing Revenue Act. Such appropriation to be exercised in the event that there is a requirement for the properties by the Council's housing acquisition program. Otherwise, the properties are to be declared surplus to the Council's operational requirements.
- **Agreed** to the disposal of the assets identified within Appendix A at values representing the best consideration reasonably obtainable to

the Council, subject to any required consultation relating to public open space

- **Delegated** authority to the Assistant Director Housing, Property and Assets to decide upon the most appropriate disposal method for each asset and should that be considered to be auction, such authority to be exercised in consultation with the Lead Member for Development & Regeneration to agree appropriate reserve values for the properties.
- **Delegated** authority to the Assistant Director Housing, Property and Assets in consultation with the Deputy Director of Legal and Democratic Services to conduct all appropriate steps to progress and conclude the asset disposals in a manner that satisfies all legal/regulatory requirements.
- **Agreed**, in principle, that the following sites should be appropriated (where necessary) for planning purposes with a view to their subsequent disposal:
 - Land at Bedale Road/Tiverton Road, Harold Hill, RM3 9TU
 - Gays Field, Jubilee Close, Romford, RM7 9LU
 - Como Street Car Park, RM7 7DN
 - Keswick Avenue Car Park, RM11 1XR
 - Dorrington Gardens Car Park, RM12 4HX
 - Angel Way Multi-storey Car Park, RM1 1HR
- **Delegated** authority to the Assistant Director Housing, Property and Assets in consultation with the Deputy Director of Legal and Democratic Services, for the purposes set out above and in accordance with section 122(2A) Local Government Act 1972 and section 233(4) Town and Country Planning Act 1990 that notices are placed in a local newspaper circulating in the area for two consecutive weeks expressing:
 - (i) an intention to appropriate (where necessary) the above sites to planning purposes; and
 - (ii) an intention to dispose of the above sites (where necessary) following its appropriation.
- **Delegated** authority to the Assistant Director Housing, Property and Assets in consultation with the Deputy Director of Legal and Democratic Services consider any objections to the intended appropriation and/or disposal before a decision to appropriate or dispose is made.

112 **THE LGA CORPORATE PEER CHALLENGE REPORT AND ACTION PLAN**

The LGA Corporate Peer Challenge Report and Action Plan

This report focuses on the Council's Action Plan, developed in response to the Local Government Association Corporate Peer Challenge Review Team's key improvement recommendations.

It is proposed that the Action Plan is approved and monitored on a six monthly basis to ensure the recommended improvements are implemented.

As the improvements are strategic in nature and underpin the Council's Corporate Plan, the Overview and Scrutiny Board may wish to select it for scrutiny, this is in accordance with the statutory role of the Overview and Scrutiny Function as set out in the Council's Constitution.

Cabinet **agreed:**

- The Action Plan
- The Senior Leadership Team are collectively the "Lead Officers" for delivery
- Cabinet and Overview and Scrutiny Board review progress against the Action Plan on a six monthly basis.

113 **THE RACE, EQUALITY, ACCESSIBILITY, DIVERSITY, INCLUSION (READI) PROGRAMME REVIEW**

Race, Equality, Accessibility, Diversity and Inclusion (READI) Programme Review.

- 1.1 In May 2021 the Council commissioned an independent Race, Equality, Accessibility, Diversity and Inclusion (READI) peer review by the LGA.
- 1.2 The review was a commissioned as a pro-active one to ensure the Council was undertaking its statutory Equalities Duties. The review focused on internal policies, procedures and sought experience of staff both in the workplace and undertaking their front-line duties. The review was undertaken by an experienced external team and followed the LGAs scope with a particular emphasis on race.
- 1.3 All those that took part did so on the understanding that contributions made were in confidence and for the sole use of the LGA peer team, whose report would be made public and include improvement recommendations. This is fully in-line with the LGAs sector offer.
- 1.4 The LGAs report was published at the 10th November 2021 Cabinet, along with the Councils Action Plan to deliver the improvement recommendations.

- 1.5 This report provides an update on the progress against the agreed action plan to achieve the improvement recommendations. A further detailed progress update will be provided to staff by the READI Programme Team in due course.
- 1.6 Havering's Vision and Corporate Plan agreed in November 2022 reaffirms its commitment for Havering as a safe place and committed to equality of opportunity for all.
- 1.7 Underpinning this, Havering has a clear zero tolerance to racism and discrimination of any kind, including providers of Council Services.
- 1.8 All Members, Staff, and third party providers are responsible for complying with the Equalities Act requirements and advancing Equality and Diversity and fostering good relations.
- 1.9 Council reports require authors to consider, comment on and address issues that arise from an Equality and Diversity consideration.
- 1.10 Both Members and Officers have access to Equality and Diversity Training and there are mandatory Equality and Diversity objectives in staff Personal Development Review

The Cabinet **agreed** the recommendations

- Cabinet **noted** the READI Programme Review Progress update in *Appendix 1*.
- All Members agreed their continued their support of the READI Programme (Members signed their commitment to the Havering pledge upon election).

The Cabinet **approved** the action plan.

Chairman



CABINET

Subject Heading:

Advertising and Sponsorship Policy

Cabinet Member:

Cllr Ray Morgon, Leader

SLT Lead:

Andrew Blake-Herbert, Chief Executive

Report Author and contact details:

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Mark.Ansell@havering.gov.uk

Policy context:

The policy supports the objectives contained in the vision *The Havering You Want to be Part Of* in securing the best health outcomes for residents.

Financial summary:

The policy will accompany a tender for small format advertising panels that is estimated to generate around £50k per annum as we move from analogue to digital panels.

It will apply to all Council advertising assets and sponsorship arrangements.

Is this a Key Decision?

Yes. The policy will have a significant effect on two or more wards.

When should this matter be reviewed?

The policy will be reviewed annually.

Reviewing OSC:

Overview and Scrutiny Board

The subject matter of this report deals with the following Council Objectives

x Resources - A well run Council that delivers for People and Place.

Place an X as appropriate

SUMMARY

The Council currently does not have an advertising and sponsorship policy and relies on the policies of contractors to determine what is seen on advertising panels and billboards across the borough and for service based judgements for other assets and sponsorship agreements.

RECOMMENDATIONS

To agree and adopt the borough-wide advertising and sponsorship policy attached at Appendix One.

REPORT DETAIL

The Council's new strategic vision '*The Havering You Want to be Part of*' outlines an approach to improving health and increasing revenue. As part of the Council's strategic approach a key action is – to take a whole systems approach to obesity, recognising that that many actions are needed to address the complex issue of obesity.

Havering has some of the highest levels of overweight and obesity regionally and nationally and there are currently no controls on the type and nature of advertising seen in our high streets. Over one in five children in reception have excess weight, this almost doubles by year six where two in five children have excess weight, and in adults estimated that 60 per cent are either overweight or obese¹.

Evidence shows that advertisements for unhealthy food and drink products directly and indirectly impact what we eat². Being exposed to foods and drink that are high in fat, salt and sugar (HFSS) is linked to a preference for HFSS products, more

¹ Office for Health Improvement and Disparities (OHID). (2023). Obesity Profile. <https://fingertips.phe.org.uk/profile/national-child-measurement-programme/data#page/1>

² Critchlow, N. et al. (2020) 'Awareness of marketing for high fat, salt or sugar foods, and the association with higher weekly consumption among adolescents: a rejoinder to the UK government's consultations on marketing regulation'. Accessed via: <https://pubmed.ncbi.nlm.nih.gov/32434618/>

snacking and consuming more calories. Individuals who recall seeing junk food adverts every day are more likely to be obese^{3 45}

A new advertising policy will accompany a new street furniture contracts and will restrict advertising of food and drink high in fat, salt or sugar and other advertising that could harm the health of Havering residents.

The policy will cover all Council advertising assets including billboards, advertising panels, the website, the Council's fleet, printed and online publications and all sponsorship agreements.

It aims to ensure that our advertising and sponsorship activity supports the Council's corporate objectives, secures the best health outcomes for residents and that our position and reputation are adequately protected in advertising and sponsorship agreements.

The advertising and sponsorship policy is attached as Appendix one.

REASONS AND OPTIONS

The reason for the decision and purpose of this policy is to give guidance on the principles and procedures relating to any advertising or sponsorship carried out by, or on behalf of, Havering Council.

As the Council manages contracts covering outdoor advertising, this policy makes clear the type and nature of advertising we will consider on our managed assets.

The policy aims to ensure that our advertising and sponsorship activity supports the Council's corporate objectives, that we adopt a consistent and professional approach towards advertising and sponsorship, that best value is obtained and provided in sponsorship arrangements including any arrangements made where we receive either money or a benefit in kind.

³ Boyland EJ, Nolan S, Kelly B, Tudur-Smith C, Jones A, Halford JCG, Robinson E. Advertising as a cue to consume: a systematic review and meta-analysis of the effects of acute exposure to unhealthy

food or non-alcoholic beverage advertising on intake in children and adults. *American Journal of Clinical Nutrition*. 2016. 103:519-533.

⁴ Boyland EJ, Whalen R, Christiansen P, McGale L, Duckworth J, Halford J, Clark M, Rosenburg G,

Vohra J. See it, want it, buy it, eat it: how food advertising is associated with unhealthy eating behaviours in 7 -11 year old children [online]. *Cancer Research UK*. 2018.

⁵ Cancer Research UK. Obesity risk doubles for teens bombarded with junk food adverts. Accessed via <https://news.cancerresearchuk.org/2018/03/15/obesity-risk-doubles-for-teens-bombarded-withjunk-food-adverts/>

The policy aims to set the standard for advertising in the borough. Advertising will need to comply with the relevant industry codes as detailed in the policy and will not be accepted if it seeks to promote:

- Weapons, violence or anti-social behaviour of any description.
- Pornography and sexually explicit services and products.
- Loans and speculative financial products.
- Gambling products, services or organisations.
- Cosmetic surgery.
- Tobacco and related products, including e-cigarettes / vaping.
- Alcohol.
- Unproven health and weight loss products e.g. weight loss pills.
- Directly or indirectly, food and non-alcoholic drink which is high in any of fat, sugar and salt ('HFSS' products), according to the Department of Health and Social Care's Nutrient Profiling Model.
- Products prohibited by the World Health Organisation's International Code of Marketing of Breastmilk Substitutes and resolutions, namely formula milk (including infant formula, follow-on formula, growing-up or toddler milks, infant milks marketed as a food for special purposes) feeding bottles, teats, related equipment or foods marketed as suitable for infants under six months of age.

Other options considered:

- No policy. Rejected as doesn't provide guidance on sponsorship or advertising and doesn't support the Council's objectives.
- Rely on the policies of contractors. Similarly rejected as doesn't directly support the Council's vision and strategic objectives.

IMPLICATIONS AND RISKS

Financial implications and risks:

This report seeks approval of a new Advertising and Sponsorship Policy for Havering Council. Although theoretically the introduction of a policy which prevents forms of advertising could result in an adverse impact on advertising income, it is deemed highly unlikely that this risk will materialise.

The policy is in line with a broader shift to a more socially responsible approach to advertising across the industry and the experience of others such as TfL supports the assumption income will not be adversely impacted. The position will continue to be monitored in the usual way through monthly budget forecasting processes and escalated in the unlikely event that the need should arise. It is also noted that a policy is a prerequisite for securing an outdoor advertising concession contract and is a key

tool through which the council can ensure messaging across the borough is contiguous with its aims and social responsibilities.

There are no direct or additional costs associated with the adoption of this policy; it will be implemented via existing budgeted officer(s).

Legal implications and risks:

The Council has a general power of competence under Part 1, Chapter 1 of the Localism Act 2011, which gives it the power to act as an individual would, subject to other statutory provisions limiting or restricting its use of such power. The recommendation in this report is compatible with this general power of competence.

The Council has several agreements with third parties for the use of the advertising space that it owns. The Council will have to work with these contracted partners to reach agreement on restrictions on the types of advertising in accordance with the policy proposed in this report. Otherwise the policy will come into effect for all new or renewals of leases and advertising contracts.

Human Resources implications and risks:

There are no HR implications in adopting this policy.

Equalities implications and risks:

A detailed Equality and Health Impact Assessment accompanies this report as appendix two (page 23).

Health and Wellbeing implications and Risks

The Havering Council Advertising and Sponsorship Policy is expected to impact positively on health and wellbeing by restricting the promotion of smoking, alcohol, gambling, unhealthy food and drink products, and breastmilk substitutes.

Restricting tobacco advertising has proven effective in reducing smoking, thereby lowering the risk of smoking-related diseases such as lung cancer and cardiovascular disorders. Similarly, alcohol advertising restrictions help mitigate the influence of promotions, resulting in reduced alcohol consumption and a decreased risk of alcohol-related disorders, especially among young people. Limiting gambling advertising also reduces gambling involvement and the associated risks of problem gambling such as financial hardship and psychological distress.

Evidence shows that restricting the marketing and advertising of foods and drinks high in fat, salt and sugar (HFSS) can reduce consumption of these unhealthy foods, which can in turn lead to improved weight management and a reduced risk of obesity, type 2 diabetes, cardiovascular diseases, and certain types of cancer.

Additionally, restrictions on HFSS products can promote healthier food choices and increase the accessibility and affordability of nutritious alternatives.

Breastfeeding protects the physical and mental health of infant and mother, and provides economic and environmental benefits. Efforts to promote and support breastfeeding can be undermined by marketing of breastmilk substitutes. The World Health Organisation International Code of Marketing of Breastmilk Substitutes and subsequent resolutions sets out recommendations to regulate the marketing of breastmilk substitutes. The LBH advertising policy follows these recommendations in full and will thus have a positive impact on health and wellbeing.

By curbing the visibility and appeal of these products and activities, advertising restrictions will help to create an environment that supports healthier lifestyles and overall well-being. In doing so, the Advertising and Sponsorship Policy will contribute to improving public health outcomes for Havering residents, particularly among vulnerable populations such as children and adolescents.

Further information and references are provided in the Equality and Health Impact Assessment associated with the policy.

Environmental and climate change implications and risks

Although adopting the policy itself will have no impact on carbon emissions, the Advertising and Sponsorship Policy will accompany a re-tender of our small format advertising contract and requirements.

Currently there are 61 sites across the borough that need to be manually updated. This means a contractor drives to each site and manually replaces a poster each time a change in advertisements are needed.

The new contract will actively support a move to digital units and once completed the contractor will be able to update the units remotely.

We also anticipate a reduction in the number of sites overall.

Via the procurement we will also be able to assess the advantage of the widely used and latest LED digital boards and their impact on the environment including the latest dimming technology.

Each new digital board installation will need planning consent and that will be the responsibility of the contractor.

BACKGROUND PAPERS

Appendix 1

London Borough of Havering

Advertising and Sponsorship Policy

September 2023

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Document Control

Sign off and ownership details

Document Name	Havering Council's Advertising and Sponsorship Policy
Version number	1.2
Approved by	Cabinet
Date Approved	t.b.c
Date for Review	September 2023
Author	Darren Bindloss
Owner	Marcus Chrysostomou

Revision history

Version	Change	Date	Dissemination
V0.1	Throughout	April	Public Health
V0.1	Mayor's Office	April	Council Advertising Network
V1.1	None	April	Mayor's Office
V1.1	Comments	t.b.c	Cabinet

Introduction

Purpose

The purpose of this policy is to give guidance on the principles and procedures relating to any advertising or sponsorship carried out by, or on behalf of, Havering Council.

As the council manages contracts covering outdoor advertising, this policy makes clear the type and nature of advertising we will consider on our managed assets.

Policy summary

The policy aims to ensure that our advertising and sponsorship activity supports the council's corporate objectives e.g. taking a whole systems approach to obesity and that our position and reputation are adequately protected in advertising and sponsorship agreements.

The policy ensures that we adopt a consistent and professional approach towards advertising and sponsorship, that best value is obtained and provided in sponsorship arrangements including any arrangements made where we receive either money or a benefit in kind.

The policy also protects councillors and individual officers from allegations of inappropriate dealings or relationships with advertisers and sponsors.

Scope

The policy covers advertising on all of the council's assets including street furniture and billboards, printed and online publications and the Council's fleet.

Timescales

The policy will be permanent but will be reviewed on an annual basis.

Aims, objectives and outcomes

The policy aims to set the standard for advertising in the borough. Advertising will need to comply with the relevant industry codes as detailed in the policy and will not be accepted if it seeks to promote:

- Weapons, violence or anti-social behaviour of any description.
- Pornography and sexually explicit services and products.
- Loans and speculative financial products.
- Gambling products, services or organisations.
- Cosmetic surgery.
- Tobacco and related products, including e-cigarettes / vaping.
- Alcohol.
- Unproven health and weight loss products e.g. weight loss pills.
- Directly or indirectly, food and non-alcoholic drink which is high in any of fat, sugar and salt ('HFSS' products), according to the Department of Health and Social Care's Nutrient Profiling Model. (See Appendix 1 for further guidance).

- Products prohibited by the World Health Organisation's International Code of Marketing of Breastmilk Substitutes and resolutions, namely formula milk (including infant formula, follow-on formula, growing-up or toddler milks, infant milks marketed as a food for special purposes) feeding bottles, teats, related equipment or foods marketed as suitable for infants under six months of age.

Policy

1.1 The purpose of this policy is to give guidance on the principles and procedures relating to any advertising or sponsorship carried out by or on behalf of Havering Council.

1.2 The application of the principles of Havering's advertisement and sponsorship policy are context dependent and will at times require subjective judgements. These will be communicated to advertisers and sponsors as reasonably required.

1.3 The standards and procedures contained here are consistent with Havering Council's advertising and sponsorship objectives:

- i. To ensure that our advertising and sponsorship activity support the council's corporate objectives e.g. taking a whole systems approach to obesity.
- ii. To ensure that our position and reputation are adequately protected in advertising and sponsorship agreements.
- iii. To ensure that we adopt a consistent and professional approach towards advertising and sponsorship.
- iv. To ensure best value is obtained and provided in sponsorship arrangements, including any arrangements made where we receive either money or a benefit in kind.
- v. To protect members and individual officers from allegations of inappropriate dealings or relationships with advertisers and sponsors.

1.4 Advertisement

- i. For the purposes of this policy, advertising is defined as the following: "an agreement between Havering Council and the advertiser where we receive money for the placing of an announcement in our publications (including any produced by the Mayor in relation to their civic, ceremonial and fundraising role), on our website, our intranet and other physical sites (including but not limited to: billboards, hoardings, printed materials and vehicles), from an organisation or individual for

the act or practice of calling public attention to one's product or service or to raise awareness.”

- ii. This policy clarifies the standards for approval of advertisements.
- iii. The regulation of advertising in the UK is the responsibility of the Advertising Standards Authority (ASA). The ASA applies the Advertising Codes [<http://www.cap.org.uk/Advertising-Codes.aspx>]. Any requirements listed herein are to be regarded as in addition to those required by the ASA UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code).
- iv. Havering Council values advertising revenue and will work to maximise this income stream.
- v. The appearance of an advertisement on any council publication is not an endorsement by Havering Council of that company, product or service. In order to make this clear all publications with advertising should carry the ‘Disclaimer Notice’ (Appendix 1).

1.5 Sponsorship

- i. For the purposes of this policy, sponsorship is defined as the following: “an agreement between Havering Council (including in relation to the Mayor’s fundraising activities) and the sponsor, where we receive either money or a benefit in kind for an event, campaign, or initiative from an organisation or individual which in turn gains publicity or other benefits.”
- ii. This policy sets the terms upon which sponsorship may be both sought and accepted by Havering Council.
- iii. We will actively seek opportunities to work with both local and national organisations by identifying sponsorship opportunities of mutual benefit and which are in keeping with our strategic priorities and core values. We welcome all opportunities to work in partnership.

2 Standards for approval of advertisements

2.1 Advertisements carried by Havering Council will not conflict with:

- i. Relevant ASA Advertising Codes.
- ii. Consumer Protection from Unfair Trading Regulations 2008.
- iii. Equality Act 2010.
- iv. The Code of Recommended Practice on Local Authority publicity. [<https://www.gov.uk/government/publications/recommended-code-of-practice-for-local-authority-publicity>]
- v. The council's policies, core values or the stated aims and priorities as set out in the Borough Plan.
- vi. Additional required standards as outlined below [2.2-2.3].

2.2 Advertising will not be accepted if it promotes any of the following:

- i. Weapons, violence or anti-social behaviour of any description.
- ii. Pornography and sexually explicit services and products.
- iii. Loans and speculative financial products.
- iv. Gambling products, services or organisations.
- v. Cosmetic surgery.
- vi. Tobacco and related products, including e-cigarettes / vaping.
- vii. Alcohol.
- viii. Unproven health and weight loss products e.g. weight loss pills.
- ix. Directly or indirectly, food and non-alcoholic drink which is high in any of fat, sugar and salt ('HFSS' products), according to the Department of Health and Social Care's Nutrient Profiling Model. (See Appendix 1 for further guidance).
- x. Products prohibited by the World Health Organisation's International Code of Marketing of Breastmilk Substitutes and resolutions, namely formula milk (including infant formula, follow-on formula, growing-up or toddler milks, infant milks marketed as a food for special purposes), feeding bottles, teats, related equipment or foods marketed as suitable for infants under six months of age. (See Appendix 2 for further guidance).

2.3 Advertising will not be accepted if, in Havering Council's opinion, it is reasonably objectionable on the grounds that it:

- i. does not comply with the law or incites, provokes or condones someone to break the law (particularly crime, violence and antisocial behaviour).
- ii. discriminates on the grounds of age, race, colour, national origin, religion or belief, sexual orientation, gender or disability.

- iii. poses a health and safety risk. For example, as a result of flickering or other visual imagery in the case of digital media.
- iv. could reasonably be seen as likely to cause pressure to conform to an unhealthy body shape, or as likely to create body confidence issues, particularly among young people.
- v. originates from a prohibited organisation, namely
 - a. Political organisations, lobby and campaign groups.
 - b. Manufacturers and distributors of tobacco products and / or alcohol.
 - c. Payday lenders.
- vi. is inappropriate to display because it is of a sensitive, indecent or obscene subject matter and/or content. For example:
 - a. It is of a racial, religious or political nature.
 - b. It affects public support for a political party or a person identified with such a party.
 - c. It is likely to cause widespread or serious offence to reasonable members of the public on account of the nature of the product or service being advertised, the design of the advertisement, its wording or by way of inference*.
 - d. It in some way touches on socially contentious issues, contains messages which could be regarded as contentious or a subtext which could cause offense*.
 - e. It can be considered as mocking of a group or citizens.
 - f. It depicts adults or children in a sexual manner or displays nude or semi-nude figures in an overtly sexual context.
 - g. It depicts or refers to indecency or obscenity or uses obscene or distasteful language.
- vii. Conflicts with Havering council in so far as it:
 - a. appears to compete directly with a council service or objective, income stream and/or the local economy of the area. Examples are out-of-borough further and adult education colleges, shopping centres and adoption/fostering services.
 - b. associates the council with organisations in financial or legal conflict with the council.
 - c. contains negative references to Havering Council services.
- viii. is unacceptable for some other substantial reason which Havering Council will identify and explain as reasonably required.

*Advertisements which promote tolerance, discourage prejudice, and are in line with the Equality Act 2010, will not normally be disapproved on the grounds that they may cause offence or relate to socially contentious issues. Likewise neither will adverts which intend to promote the right to life, liberty or security of the person, or which reasonably promote causes which are not party political.

3. Procedures for advertisement approval

3.1 All contracts for corporate advertising will be managed centrally through the Communications Service to ensure that the best terms are negotiated, that standing orders are not breached and to ensure continuity should the person originally party to the agreement change jobs or leave.

3.2 The Communications Service will need to see and approve:

- i. All advertising before any Havering Council publication goes to press or any advertisement is displayed in any part of the council or the borough
- ii. The layout, content and placement of any advertising features or supplements.

3.3 For advertising placements that are sold via digital exchanges, the Communications Service will need to approve permitted advertising categories.

3.4 In all circumstances the Head of Communications retains the right to disapprove any advertisement or editorial related to advertisements in line with Section 2 of this policy.

3.5 Acceptance of advertising does not imply endorsement of products and service by Havering Council. In order to make this clear all publications with advertising or sponsorship should carry the 'Disclaimer Notice' (Appendix 3).

4. Standards for approval of sponsorship

4.1 Sponsors carried by Havering Council must operate within all relevant legislation and guidance including:

- i. UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code).
- ii. Code of Recommended Practice on Local Authority Publicity
- iii. The Business Protection from Misleading Marketing Regulations 2008.
- iv. The Consumer Protection from Unfair Trading Regulations 2008.
- v. Equality Act 2010.

4.2 Havering Council cannot put itself in a position where it might be said that a partnership has, might have, or may be thought to have:

- i. influenced the council or its officers or members in carrying out its statutory functions in order to gain favourable terms from the council in any business or other agreement.
- ii. aligned the council with any organisation which conducts itself in a manner which conflicts with our aims or values.

4.3 Havering council is not able to enter into agreements for sponsorships which:

- i. are in direct conflict with the council's advertising policy.
- ii. are, at the sole discretion of the Communications Service, considered inappropriate in regard to the organisation, individual or in respect of particular products.
- iii. involve companies who produce or promote predominantly HFSS foods and / or drinks (according to the Nutrient Profiling Model) including sports drinks, fruit juices and smoothies.
- iv. in accordance with the International Code of Marketing of Breast-milk Substitutes, involve companies who produce or promote infant formula, other infant milks, bottles and teats, and foods marketed as suitable before six months of age.

4.4 Sponsorship materials must:

- i. not detract from Havering's strong corporate identity
- ii. in their nature and content, be consistent with advertising policy as set out in Section 2

5. Procedures for sponsorship approval

- 5.1 Before seeking sponsorship, council officers and the Mayor must consider this policy document and follow the guidelines provided. It is recommended that all potential sponsors are referred to this policy
- 5.2 In accordance with our procurement policy and procedures we may advertise a sponsorship opportunity to potential sponsors.
- 5.3 Sponsorship agreements must be referred to Legal Services for review prior to signing. Before agreeing to any sponsorship opportunity all financial costs must be identified, including the sponsorship equivalent value of any sponsorship in kind.
- 5.4 All sponsorship bids shall be approved by the Head of Communications and the appropriate Cabinet member.
- 5.5 The Communications Service will agree with the sponsor the nature and content of the publicity and will retain the right to approve all advertising material in line with the advertising policy.
- 5.6 Acceptance of sponsorship does not imply endorsement of products and service by Havering Council. In order to make this clear all publications with sponsorship should carry the Disclaimer Notice in Appendix 3

Guidance for decisions regarding advertising including high fat, salt or sugar food and non-alcohol drinks.

1. Definition of high fat, salt, sugar foods

1.1 Consistent with the Transport for London advertising policy effective 25 February 2019 the Department of Health and Social Care (DHSC) UK Nutrient Profiling Model (NPM) has been adopted by Havering Council to define high fat, salt and sugar (HFSS) foods.

1.2 Any revisions to the NPM will be reflected in the advertisement decisions made by the council.

1.3 Explanatory guidance for calculating the Nutrient Profile score for food and drink can be found here: <https://www.gov.uk/government/publications/the-nutrient-profiling-model>. It is the advertisers' responsibility to verify the HFSS status of any product featured in their advertisement.

2. Decision Table

Advertisement Content	Outcome	Notes
Only non-HFSS products featured	Approval	Advertisement must also meet standards for approval of advertisements; Section 2.
Only HFSS products featured	Rejection	
A range of products are featured, including some which are HFSS	Rejection	A meal or range e.g. meal deal will only be accepted if all products or food items are non-HFSS. Applies across all settings (restaurants, delivery services etc.)
No food or non-alcoholic drink is featured directly, but the advertisement is from a food and non-alcoholic drink brand.	Approval only if the advertisement promotes healthier options, with no HFSS product included.	Inclusive of ads with brand logos only, directions to a brand's physical, mobile or online presence, or promotional advertising.
Food or non-alcoholic drink is shown incidentally or implied	Probable rejection if the food or non-alcoholic drink can be reasonably considered to be HFSS	Includes cases in which the depicted food is made from non-food products.

Food and non-alcoholic drink is referenced in text or through graphical representations	Possible rejection if the advertisement can be reasonably considered to promote HFSS food	Includes cases in which references do not relate to a specific product which can be assessed for its HFSS status.
Indirect promotion of HFSS food and/or drink	Possible rejection if the product does not carry a prominent product descriptor to help differentiate it from non-compliant products	Includes cases where a product is non-HFSS but falls within a category covered by DHSC's recommendations for sugar, calorie or salt reduction. Children should not usually be shown in advertisements for products which are compliant in a category which is covered by DHSC's recommendations for sugar or calorie reduction
Portion sizes	Rejection if portion sizes displayed are not deemed to encourage healthy eating.	The NPM model is based on nutrients per 100g of a product, rather than recommended portion size. Advertisers should always ensure that they promote products in portion sizes which encourage healthy eating. For products that are non-HFSS but fall within a category covered by PHE's recommendations for sugar or calorie reduction, the product should be displayed as a single portion.

3. Interpretation of guidelines

If advertisers and agencies are unsure about how to interpret any aspect of these guidelines, we would encourage them to get in touch with Havering Council so that we can work together on a solution and avoid submitted copy requiring changes or being rejected

Guidance for decisions regarding breastmilk substitutes

1. Definition

The World Health Organisation (WHO) International Code of Marketing of Breastmilk Substitutes and subsequent resolutions^{6,7} (“Code”) applies to the marketing of breastmilk substitutes and related practices. These are defined in the following guidelines:

- 1.1 No advertising of any breast-milk substitutes or related products
 - 1.1.1 Breast-milk substitutes refers to “any food being marketed or otherwise presented as a partial or total replacement for breast milk, whether or not suitable for that purpose”.
 - 1.1.2 Products include:
 - Infant formula
 - Follow-on formula
 - Growing up or toddler milks
 - Formulas for infants with special medical or nutritional needs
 - Baby foods marketed for infants under 6 months
 - Bottles and teats
- 1.2 No promotion of complementary foods before they are needed
 - 1.2.1 Complementary foods refers to “any food whether manufactured or locally prepared, suitable as a complement to breast milk or to infant formula, when either become insufficient to satisfy the nutritional requirements of the infant. Such food is also commonly called “weaning food” or “breast-milk supplement””.
 - 1.2.2 It is recommended that babies are exclusively breastfed for the first 6 months. Advertising of complementary foods to infants under 6 months is deemed inappropriate.
- 1.3 No processed food and drink marketed for children under 3 years
 - 1.3.1 Processed commercial foods and drinks marketed for young children undermine public health advice for children to have minimally processed and unprocessed foods and drinks.

2. Context

Havering Council is committed to achieving and maintaining UNICEF Baby Friendly Initiative accreditation, and must therefore work within the WHO Code and resolutions.

⁶ [World Health Organisation \(WHO\) International Code of Marketing of Breast-Milk Substitutes 1981 and subsequent resolutions](#)

⁷ [World Health Organisation \(2008\). The International Code of Marketing of Breastmilk Substitutes – Frequently Asked Questions](#)

Disclaimer Notice for advertisement or sponsorship

'Whilst every effort has been made to ensure the accuracy of advertisements contained in the publication, Havering Council cannot accept any liability for errors and omissions. Havering Council cannot accept any responsibility for claims made by advertisers and their inclusion in [name of publication] should not be taken as an endorsement by Havering Council.'

Applicability

The policy applies to all council officers and councillors including the Mayor.

For the purposes of this policy, sponsorship is defined as the following: “an agreement between Havering Council (including in relation to the Mayor’s fundraising activities) and the sponsor, where we receive either money or a benefit in kind for an event, campaign, or initiative from an organisation or individual which in turn gains publicity or other benefits.”

Ownership and authorisation

This policy has been developed by the communications and public health teams.

The owner is the communication service and the authorising body is Cabinet.

Implementation

The Advertising and Sponsorship Policy does not have a mandatory training requirement or any other training needs.

It does however require widespread cascade and adherence.

Monitoring and review

The policy will be monitored by the communications service and will be reviewed annually.

Further information

For further information contact darren.bindloss@haverling.gov.uk

Equality & Health Impact Assessment record

1	Title of activity	Havering Council's Corporate Advertising and Sponsorship Policy		
2	Type of activity	New Policy		
3	Scope of activity	The purpose of this policy is to give guidance on the principles and procedures relating to any advertising or sponsorship carried out by or on behalf of Havering Council.		
4a	Are you changing, introducing a new, or removing a service, policy, strategy or function?	Yes	If the answer to <u>any</u> of these questions is 'YES', please continue to question 5.	If the answer to <u>all</u> of the questions (4a, 4b & 4c) is 'NO', please go to question 6.
4b	Does this activity have the potential to impact (either positively or negatively) upon people (9 protected characteristics)?	Yes		
4c	Does the activity have the potential to impact (either positively or negatively) upon any factors which determine people's health and wellbeing?	Yes		
5	If you answered YES:	Please complete the EqHIA in Section 2 of this document. Please see Appendix 1 for Guidance.		
6	If you answered NO: (Please provide a clear and robust explanation on why your activity does not require an EqHIA. This is essential in case the activity is challenged under the Equality Act 2010.) <i>Please keep this checklist for your audit trail.</i>			

Date	Completed by	Review date
22.05.23	Darren Bindloss	September 2024

Appendix 2



Equality & Health Impact Assessment (EqHIA)

Document control

Title of activity:	Havering Council's Corporate Advertising and Sponsorship Policy
Lead officer:	Darren Bindloss Deputy Head of Communications (Marketing and Events)
Approved by:	Marcus Chrysostomou Head of Communications
Version Number	1
Date and Key Changes Made	03/05/2023
Scheduled date for next review:	W/C 02/05/2023- then 5 years.

Did you seek advice from the Corporate Policy & Diversity team? Please note that the Corporate Policy & Diversity and Public Health teams require at least 5 working days to provide advice on EqHIAs.	Yes
Did you seek advice from the Public Health team?	Yes
Does the EqHIA contain any confidential or exempt information that would prevent you publishing it on the Council's website? See Publishing Checklist.	No

Please note that EqHIAs are **public** documents and unless they contain confidential or sensitive commercial information must be made available on the Council's [EqHIA webpage](#).

1. Equality & Health Impact Assessment Checklist

Please complete the following checklist to determine whether or not you will need to complete an EqHIA and ensure you keep this section for your audit trail. If you have any questions, please contact EqHIA@havering.gov.uk for advice from either the Corporate Diversity or Public Health teams. Please refer to the Guidance in Appendix 1 on how to complete this form.

About your activity

1	Title of activity	Havering Council's Corporate Advertising and Sponsorship Policy		
2	Type of activity	New policy		
3	Scope of activity	The purpose of this policy is to give guidance on the principles and procedures relating to any advertising or sponsorship carried out by or on behalf of Havering Council.		
4a	Are you changing, introducing a new, or removing a service, policy, strategy or function?	Yes	If the answer to <u>either</u> of these questions is 'YES', please continue to question 5.	If the answer to <u>all</u> of the questions (4a, 4b & 4c) is 'NO', please go to question 6.
4b	Does this activity have the potential to impact (either positively or negatively) upon people from different backgrounds?	Yes		
4c	Does the activity have the potential to impact (either positively or negatively) upon any factors which determine people's health and wellbeing?	Yes	Please use the Screening tool before you answer this question.	
5	If you answered YES:	Please complete the EqHIA in Section 2 of this document. Please see Appendix 1 for Guidance.		
6	If you answered NO:	<p>Please provide an explanation on why your activity does not require an EqHIA. This is essential, in case the activity is challenged under the Equality Act 2010.</p> <p>Please keep this checklist for your audit trail.</p>		

Completed by:	Karen Thomas
Date:	03/05/2023

2. The EqHIA – How will the strategy, policy, plan, procedure and/or service impact on people?

Background/context:

Advertisements and sponsorship agreements enable advertisers to reach Havering residents and wider consumers so they become familiar with a brand, product, event or service and provide commercial and wider benefits to the advertiser / sponsor.

This policy recognises the council may have agreements with advertisers and sponsors where we receive money or benefit in kind for the placing of an announcement in our publications, on our website and other physical sites including

- billboards
- hoardings
- printed materials and
- vehicles.

With a clear policy around advertising and sponsorship we will be able to set clear expectations around the type of advertisements seen in the borough and the sponsorship we will consider to support the council's objectives contained in the council's vision *The Havering I want to be part of*. This will help residents to lead healthy lifestyles.

The policy will also protect councillors and individual officers from allegations of inappropriate dealings or relationships with advertisers and sponsors.

Our requirements include those specified by the Advertising Standards Agency UK Code of Non-Broadcast Advertising and Direct & Promotional Marketing (CAP Code).

Both CAP and BCAP commit to equality and diversity through the ASA's diversity and inclusion strategy, and, consider themselves subject to the public sector equality duty. As a result, CAP and BCAP seek to ensure that the protections they provide to those sharing protected characteristics are as strong as possible.

Who will be affected by the activity?
<p>Residents and consumers viewing advertisements across the borough will be affected by the policy as it will enable the council to ensure the type and nature of advertisements seen on its assets support the council’s strategic objectives.</p> <p>Private sector businesses and outdoor advertising agencies will be clear on the type of advertisements that can be seen for their own commercial return.</p>

Protected Characteristic - Age: Consider the full range of age groups							
<p><i>Please tick (✓) the relevant box:</i></p> <table border="1" style="width: 100%;"> <tr> <td style="width: 70%;">Positive</td> <td style="width: 30%; text-align: center;">✓</td> </tr> <tr> <td>Neutral</td> <td></td> </tr> <tr> <td>Negative</td> <td></td> </tr> </table>	Positive	✓	Neutral		Negative		<p>Overall impact: Advertising and sponsorship will not be accepted if it discriminates on the grounds of age</p> <p style="text-align: right;"><i>*Expand box as required</i></p>
Positive	✓						
Neutral							
Negative							
<p>Evidence:</p> <p>The Advertising Standards Agency (ASA) codes protect characteristics including age and consider whether the depiction of age in ads is likely to cause serious or widespread offence and stipulate that advertisers should take particular care to ensure that this is not the case.</p> <p>Consumption of foods and drinks high in fat, sugar and/or salt (HFSS) is widely promoted through advertising and marketing, and evidence shows that exposure to marketing affects food preference, choice and purchasing in adults and children</p> <p>Restriction of advertising HFSS food and drink as one key part of a whole systems approach to obesity follows the Government’s 2020 obesity strategy.</p>							
<p>Sources used:</p> <p>https://www.asa.org.uk/</p> <p>Hastings, G. et al. (2003) Review of research on the effects of food promotion to children. University of Stirling.</p> <p>Cairns, G. et al. (2009) The extent, nature and effects of food promotion to children: A review of the evidence to December 2008. World Health Organisation.</p>							

Protected Characteristic - Disability: Consider the full range of disabilities; including physical, mental, sensory, progressive conditions and learning difficulties. Also consider neurodivergent conditions e.g. dyslexia and autism.		
Please tick (✓) the relevant box:		Overall impact: Advertising and sponsorship will not be accepted if it discriminates on the grounds of disability. *Expand box as required
Positive	<input checked="" type="checkbox"/>	
Neutral	<input type="checkbox"/>	
Negative	<input type="checkbox"/>	
Evidence: ASA Code rule 4.1 states that "marketing communications must not contain anything that is likely to cause serious or widespread offence. Particular care must be taken to avoid causing offence on the grounds of age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. ASA stipulates that marketers should take particular care to ensure that references to or depictions of disability in advertising will not cause offence. If an ad appears to mock disability or people with a disability it will be considered offensive, even if this was not the advertiser's intention.		
Sources used: https://www.asa.org.uk Offence: Disability - ASA CAP		

Protected Characteristic – Sex / gender: Consider both men and women		
Please tick (✓) the relevant box:		Overall impact: Advertising or sponsorship will not be accepted if it discriminates on the grounds of gender.
Positive	<input checked="" type="checkbox"/>	
Neutral	<input type="checkbox"/>	
Negative	<input type="checkbox"/>	
Evidence:		

Code rules 4.9 (CAP Code) and 4.14 (BCAP Code) rules state that ads ‘must not include gender stereotypes that are likely to cause harm, or serious or widespread offence’. This followed a [review](#) of gender stereotyping in ads by the ASA, which indicated that certain kinds of gender stereotypes can negatively reinforce how people think they should look and behave, and how others think they should look and behave, due to their gender, which may have harmful consequences for individuals and for society.

The rule is supported by additional guidance: [Advertising Guidance on depicting gender stereotypes likely to cause harm or serious or widespread offence](#).

The guidance clarifies that the rule is not intended to prevent ads from featuring: glamorous, attractive, successful, aspirational or healthy people or lifestyles; one gender only; or gender stereotypes when they are used as a means to challenge their negative effects. It addresses five different potentially harmful categories, and sets out examples of scenarios which are likely to be problematic for each.

Sources used:

[Harm and Offence: Gender stereotypes - ASA | CAP](#)

Protected Characteristic – Ethnicity / race / nationalities: Consider the impact on different minority ethnic groups and nationalities	
Please tick (✓) the relevant box:	
Positive	<input checked="" type="checkbox"/>
Neutral	<input type="checkbox"/>
Negative	<input type="checkbox"/>
<p>Overall impact:</p> <p>Advertising and sponsorship will not be accepted if it discriminates on the grounds of ethnicity, race or nationality.</p> <p style="text-align: right;"><i>*Expand box as required</i></p>	
<p>Evidence:</p> <p>The Advertising Standards Agency Rule 4.1 states that marketing communications must not contain anything that is likely to cause serious or widespread offence, and specifies that particular care must be taken to avoid causing offence on the grounds of: age; disability; gender; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.</p>	

ASA stipulates that marketers should be aware of the potential to cause serious or widespread offence when referring to different races, cultures, nationalities or ethnic groups, and ensure that their marketing communications are not likely to do so.

**Expand box as required*

Sources used:

[Offence: Race - ASA | CAP](#)

[ASA publishes findings on racial and ethnic stereotyping in ads - ASA | CAP](#)

[Equality Act 2010 | Equality and Human Rights Commission \(equalityhumanrights.com\)](#)

[Public Sector Equality Duty | Equality and Human Rights Commission \(equalityhumanrights.com\)](#)

**Expand box as required*

Protected Characteristic – Religion / faith: Consider people from different religions or beliefs, including those with no religion or belief

<i>Please tick (✓) the relevant box:</i>		Overall impact: We will not accept advertising or sponsorship that discriminates on the grounds of religion or religious belief.
Positive	✓	
Neutral		
Negative		

**Expand box as required*

Evidence:

In addition to the ASA Code 4.1 where marketing communications must not contain anything that is likely to cause serious or widespread offence, and specifies that particular care must be taken to avoid causing offence on the grounds of religion, **ASA states:** “Religion and belief are potentially extremely sensitive subjects. References to religion in marketing communications, even humorous ones, have the capacity to cause serious offence.

Marketers should ensure that they consider carefully the tone used and, if necessary, research the likelihood of marketing communications causing serious or widespread offence to followers of the faiths concerned.

**Expand box as required*

Sources used:

[Religious advertising and the rules - ASA | CAP](#)

[Equality Act 2010 | Equality and Human Rights Commission \(equalityhumanrights.com\)](#)

[Public Sector Equality Duty | Equality and Human Rights Commission \(equalityhumanrights.com\)](#)

**Expand box as required*

Protected Characteristic - Sexual orientation: Consider people who are heterosexual, lesbian, gay or bisexual		
<i>Please tick (✓) the relevant box:</i>		Overall impact: We will not accept advertising or sponsorship that discriminates on the grounds of sexual orientation.
Positive	✓	
Neutral		
Negative		
<i>*Expand box as required</i>		

Evidence:

4.9 (CAP Code) and 4.14 (BCAP Code) state that ads ‘must not include gender stereotypes that are likely to cause harm, or serious or widespread offence’. This followed a review of gender stereotyping in ads by the ASA is also supported by additional guidance on potentially harmful gender stereotypes.

CAP Code rule 4.1 states that marketing communications must not contain anything that is likely to cause serious or widespread offence. And particular care must be taken to avoid causing offence on the grounds of race, religion, gender, sexual orientation, disability or age. Code rule 4.9 states that ads ‘must not include gender stereotypes that are likely to cause harm, or serious or widespread offence’.

Ads which mock characters based on their sexual orientation or gender identity, or which use stereotypes in a way which may demean or ridicule groups or individuals, are likely to be considered offensive or harmful (see offence: use of stereotypes).

Sources used:

[Offence: Sexual orientation and gender identity - ASA | CAP](#)

Protected Characteristic - Gender reassignment: Consider people who are seeking, undergoing or have received gender reassignment surgery, as well as people whose gender identity is different from their gender at birth	
<i>Please tick (✓) the relevant box:</i>	
Positive	<input checked="" type="checkbox"/>
Neutral	<input type="checkbox"/>
Negative	<input type="checkbox"/>
Overall impact: We will not accept advertising or sponsorship that discriminates on the grounds of gender reassignment.	
Evidence: Advertising Standards Agency (ASA) Code rule 4.1 states that marketing communications must not contain anything that is likely to cause serious or widespread offence, and states that particular care must be taken to avoid causing offence on the grounds of: gender reassignment.	
Sources used: https://www.asa.org.uk/	

Protected Characteristic – Marriage / civil partnership: Consider people in a marriage or civil partnership	
<i>Please tick (✓) the relevant box:</i>	
Positive	<input checked="" type="checkbox"/>
Neutral	<input type="checkbox"/>
Negative	<input type="checkbox"/>
Overall impact: We will not accept advertising that discriminates on the grounds of marriage / civil partnership	

<p>Evidence:</p> <p>CAP Code</p> <p>Marketing communications must not include anything likely to cause harm. To comply with this rule, marketers must have particular regard to the likelihood of causing harm to vulnerable people, and to the following characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.</p> <p>BCAP Code</p> <p>Advertisements must not include anything likely to cause harm. To comply with this rule, broadcasters must have particular regard to the likelihood of causing harm to vulnerable people, and to the following characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.</p>
<p>Sources used:</p> <p>www.asa.org.uk</p>

Protected Characteristic - Pregnancy, maternity and paternity: Consider those who are pregnant and those who are taking maternity or paternity leave	
<i>Please tick (✓) the relevant box:</i>	Overall impact:
Positive	<p>We will not accept advertising or sponsorship that discriminates on the grounds of pregnancy, maternity or paternity.</p> <p>Further, we won't accept advertising prohibited by the World Health Organisation's International Code of Marketing of Breastmilk Substitutes and resolutions.</p>
Neutral	
Negative	

Evidence:

The codes protect this characteristic as follows:

CAP Code

Marketing communications must not include anything likely to cause harm. To comply with this rule, marketers must have particular regard to the likelihood of causing harm to vulnerable people, and to the following characteristics: age; disability; gender reassignment; marriage and civil partnership; **pregnancy and maternity**; race; religion or belief; sex; and sexual orientation.

BCAP Code

Advertisements must not include anything likely to cause harm. To comply with this rule, broadcasters must have particular regard to the likelihood of causing harm to vulnerable people, and to the following characteristics: age; disability; gender reassignment; marriage and civil partnership; **pregnancy and maternity**; race; religion or belief; sex; and sexual orientation.

**Expand box as required*

Sources used:

www.asa.org.uk

[World Health Organisation \(WHO\) International Code of Marketing of Breast-Milk Substitutes 1981 and subsequent resolutions](#)

**Expand box as required*

Socio-economic status: Consider those who are from low income or financially excluded backgrounds

<i>Please tick (✓) the relevant box:</i>		Overall impact: There is a well-established link between money and resources and variations in health. Poverty in particular – and persistent poverty especially – is associated with poorer health. This policy looks to support the council’s public health priorities.
Positive	✓	
Neutral		
Negative		

Evidence:

People on the lowest incomes (the bottom 40% of the income distribution) are more than twice as likely to say they have poor health than people on the highest incomes

(the top 20%), and more than five times as likely to say they have bad or very bad health.

Poverty in particular is associated with worse health, especially persistent poverty.

Sources used:

[Money and resources | The Health Foundation](#)

**Expand box as required*

Health & Wellbeing Impact: Please use the Health and Wellbeing Impact Tool on the next page to help you answer this question.

Consider both short and long-term impacts of the activity on a person’s physical and mental health, particularly for disadvantaged, vulnerable or at-risk groups. Can health and wellbeing be positively promoted through this activity?

<i>Please tick (✓) all the relevant boxes that apply:</i>		<p>Overall impact:</p> <p>Our advertising and sponsorship policy promotes positive services, helps address obesity, addictions and low self-esteem, and prevents promotion of breastmilk substitutes</p> <p style="text-align: right;"><i>*Expand box as required</i></p> <p>Do you consider that a more in-depth HIA is required as a result of this brief assessment? Please tick (✓) the relevant box</p> <p style="text-align: right;">Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
Positive	✓	
Neutral		
Negative		

Evidence:

HFSS foods and drinks are often associated with excessive calorie intake, poor nutrition, and an increased risk of obesity and related diseases. By introducing restrictions on the marketing and advertising of HFSS products, the consumption of these unhealthy foods can be reduced. This, in turn, can lead to improved dietary habits, reduced calorie intake, leading to weight management and a reduced risk of obesity, type 2 diabetes, cardiovascular diseases, and certain types of cancer. Additionally, restrictions on HFSS products can promote healthier food choices and increase the accessibility and affordability of nutritious alternatives. Such measures are crucial in protecting public health, particularly among vulnerable populations such as children and adolescents, and in creating an environment that supports healthier lifestyles and overall well-being.

Restricting advertising for smoking, alcohol, and gambling brings significant health benefits. Tobacco advertising bans have proven effective in curtailing tobacco consumption, reducing smoking rates, lowering the risk of smoking-related diseases such as lung cancer and cardiovascular disorders. Similarly, alcohol advertising restrictions help mitigate the influence of promotions, resulting in reduced alcohol consumption and a decreased risk of alcohol-related disorders, especially among young people. Limiting gambling advertising also reduces gambling involvement and the associated risks of problem gambling such as financial hardship and psychological distress. These restrictions protect vulnerable populations, such as young people, from the harmful effects of these behaviours. By curbing the visibility and appeal of these products and activities, advertising restrictions contribute to improved public health outcomes, reducing the burden of diseases and promoting healthier lifestyles.

Breastfeeding protects children and mothers from a range of illnesses, supports the mother-baby relationship and mental health of both, and contributes to significant savings to the NHS. Efforts to promote and support breastfeeding can be undermined by marketing of breastmilk substitutes. The World Health Organisation International Code of Marketing of Breastmilk Substitutes and subsequent resolutions sets out recommendations to regulate the marketing of breastmilk substitutes. The LBH advertising policy follows these recommendations.

*Expand box as required

Sources used:

1. Department of Health and Social Care. (2020). Restricting promotions of products high in fat, sugar and salt by location and by price: government response to public consultation.
2. [Equality Act 2010 | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://equalityhumanrights.com)
3. Gambling Commission. (2019). National strategy to reduce gambling harms 2019 to 2022 <https://www.gamblingcommission.gov.uk/print/national-strategy-to-reduce-gambling-harms#>
4. House of Lords (2022) Gambling advertising and harm caused by gambling. <https://lordslibrary.parliament.uk/gambling-advertising-and-harm-caused-by-gambling/>
5. <https://www.asa.org.uk/>
6. Murray, R., Leonardi-Bee, J., Barker, A., Brown, O., & Langley, T. (2022). The effect of alcohol marketing on people with, or at risk of, an alcohol problem: A rapid literature review. *University of Nottingham & SPECTRUM*.
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8. [Public Sector Equality Duty | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://equalityhumanrights.com)

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10. World Health Organization. (2022). Reducing the harm from alcohol by regulating cross-border alcohol marketing, advertising and promotion: a technical report.
11. Yau, A., Berger, N., Law, C., Cornelsen, L., Greener, R., Adams, J., Boyland, E.J., Burgoine, T., de Vocht, F., Egan, M. and Er, V., (2021) Changes in household food and drink purchases following restrictions on the advertisement of high fat, salt, and sugar products across the Transport for London network: A controlled interrupted time series analysis. *The Lancet*, 398, p. S15.

Other London Boroughs advertising policies for reference.

NHS: [Benefits of breastfeeding](#)

Unicef: [The benefits of breastfeeding](#)

[Lancet Breastfeeding Series 2023](#)

[World Health Organisation International Code of Marketing of Breast-Milk Substitutes 1981 and subsequent resolutions](#)

**Expand box as required*



3. Health & Wellbeing Screening Tool

Will the activity / service / policy / procedure affect any of the following characteristics? Please tick/check the boxes below

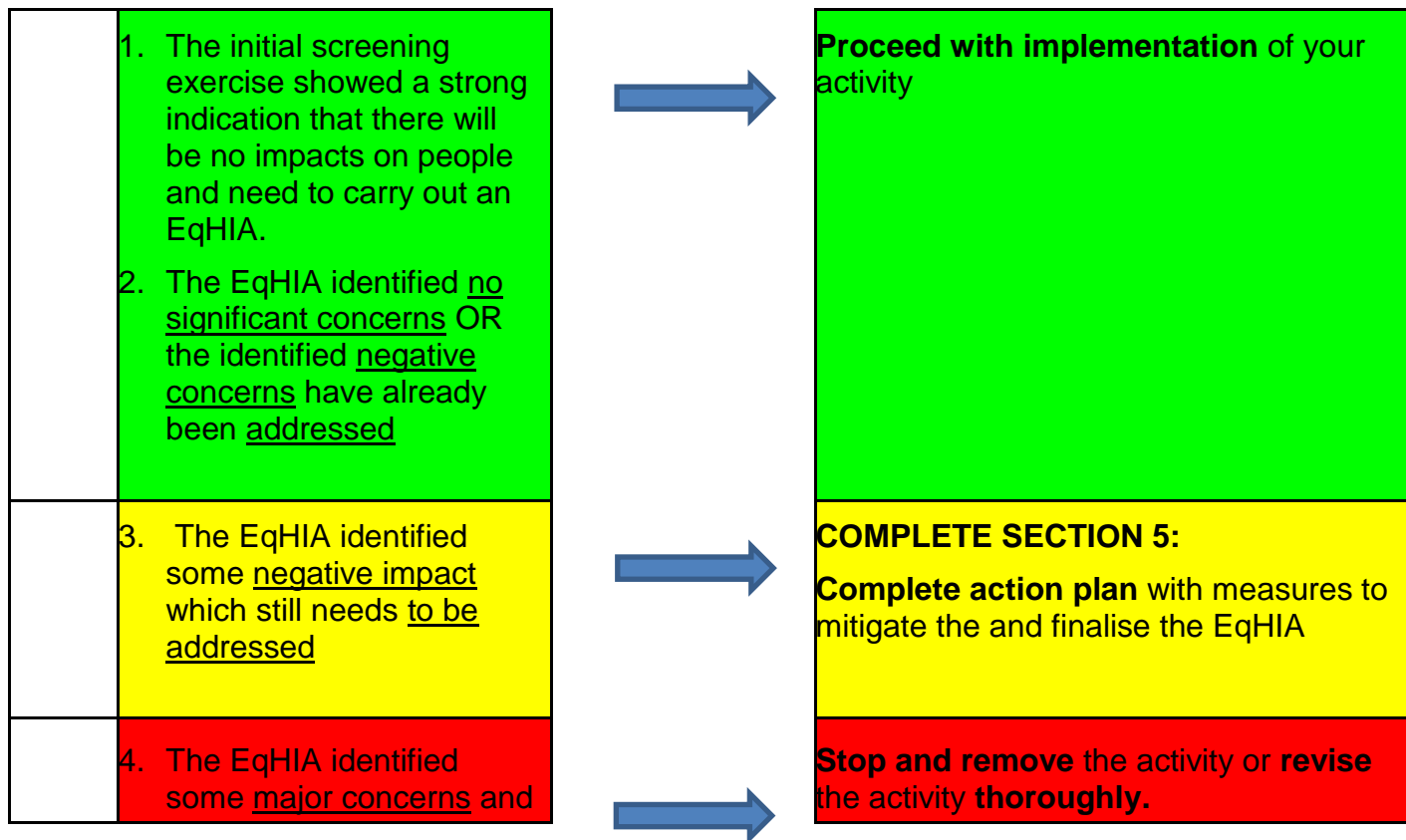
The following are a range of considerations that might help you to complete the assessment.

Lifestyle YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	Personal circumstances YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	Access to services/facilities/amenities YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
<input checked="" type="checkbox"/> Diet <input checked="" type="checkbox"/> Exercise and physical activity <input checked="" type="checkbox"/> Smoking <input checked="" type="checkbox"/> Exposure to passive smoking <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Alcohol intake <input type="checkbox"/> Dependency on prescription drugs <input type="checkbox"/> Illicit drug and substance use <input type="checkbox"/> Risky Sexual behaviour <input checked="" type="checkbox"/> Other health-related behaviours, such as tooth-brushing, bathing, and wound care	<input type="checkbox"/> Structure and cohesion of family unit <input checked="" type="checkbox"/> Parenting <input type="checkbox"/> Childhood development <input type="checkbox"/> Life skills <input checked="" type="checkbox"/> Personal safety <input type="checkbox"/> Employment status <input type="checkbox"/> Working conditions <input checked="" type="checkbox"/> Level of income, including benefits <input checked="" type="checkbox"/> Level of disposable income <input type="checkbox"/> Housing tenure <input type="checkbox"/> Housing conditions <input type="checkbox"/> Educational attainment <input type="checkbox"/> Skills levels including literacy and numeracy	<input type="checkbox"/> to Employment opportunities <input type="checkbox"/> to Workplaces <input type="checkbox"/> to Housing <input type="checkbox"/> to Shops (to supply basic needs) <input checked="" type="checkbox"/> to Community facilities <input type="checkbox"/> to Public transport <input type="checkbox"/> to Education <input checked="" type="checkbox"/> to Training and skills development <input type="checkbox"/> to Healthcare <input type="checkbox"/> to Social services <input type="checkbox"/> to Childcare <input type="checkbox"/> to Respite care <input checked="" type="checkbox"/> to Leisure and recreation services and facilities
Social Factors YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	Economic Factors YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	Environmental Factors YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
<input type="checkbox"/> Social contact <input type="checkbox"/> Social support <input type="checkbox"/> Neighbourliness <input checked="" type="checkbox"/> Participation in the community <input checked="" type="checkbox"/> Membership of community groups <input type="checkbox"/> Reputation of community/area	<input type="checkbox"/> Creation of wealth <input type="checkbox"/> Distribution of wealth <input type="checkbox"/> Retention of wealth in local area/economy <input type="checkbox"/> Distribution of income <input type="checkbox"/> Business activity <input type="checkbox"/> Job creation	<input checked="" type="checkbox"/> Air quality <input type="checkbox"/> Water quality <input type="checkbox"/> Soil quality/Level of contamination/Odour <input type="checkbox"/> Noise levels <input type="checkbox"/> Vibration <input type="checkbox"/> Hazards

<input type="checkbox"/> Participation in public affairs <input type="checkbox"/> Level of crime and disorder <input checked="" type="checkbox"/> Fear of crime and disorder <input checked="" type="checkbox"/> Level of antisocial behaviour <input checked="" type="checkbox"/> Fear of antisocial behaviour <input type="checkbox"/> Discrimination <input type="checkbox"/> Fear of discrimination <input checked="" type="checkbox"/> Public safety measures <input type="checkbox"/> Road safety measures	<input checked="" type="checkbox"/> Availability of employment opportunities <input type="checkbox"/> Quality of employment opportunities <input checked="" type="checkbox"/> Availability of education opportunities <input type="checkbox"/> Quality of education opportunities <input type="checkbox"/> Availability of training and skills development opportunities <input type="checkbox"/> Quality of training and skills development opportunities <input type="checkbox"/> Technological development <input type="checkbox"/> Amount of traffic congestion	<input type="checkbox"/> Land use <input type="checkbox"/> Natural habitats <input type="checkbox"/> Biodiversity <input type="checkbox"/> Landscape, including green and open spaces <input type="checkbox"/> Townscape, including civic areas and public realm <input checked="" type="checkbox"/> Use/consumption of natural resources <input type="checkbox"/> Energy use: CO2/other greenhouse gas emissions <input type="checkbox"/> Solid waste management <input type="checkbox"/> Public transport infrastructure
--	--	--

4. Outcome of the Assessment

The EqHIA assessment is intended to be used as an improvement tool to make sure the activity maximises the positive impacts and eliminates or minimises the negative impacts. The possible outcomes of the assessment are listed below and what the next steps to take are:



Please tick overall your was:

	showed that it is <u>impossible to diminish negative impacts</u> from the activity to an acceptable or even lawful level
--	--

Complete an EqHIA on the revised proposal.

(✓) what the outcome of assessment

4. Action Plan

The real value of completing an EqHIA comes from identifying the actions that can be taken to eliminate/minimise **negative** impacts and enhance/optimize positive impacts. In this section you should list the specific actions that set out how you will mitigate or reduce any **negative** equality and/or health & wellbeing impacts, identified in this assessment. Please ensure that your action plan is: more than just a list of proposals and good intentions; if required, will amend the scope and direction of the change; sets ambitious yet achievable outcomes and timescales; and is clear about resource implications.

Protected characteristic / health & wellbeing impact	Identified Negative or Positive impact	Recommended actions to mitigate Negative impact* or further promote Positive impact	Outcomes and monitoring**	Timescale	Lead
Impact on battling child obesity	Positive	Promote healthy lifestyle	Local and national child obesity statistics	Immediate	Public health
Impact on people's lifestyles	Positive	Promote beneficial products and services	Local and national child obesity statistics	Immediate	Public health
Limiting any negative advertising	Positive	Help decrease bad habits and anti-social behaviours	Local and national child obesity statistics	Immediate	Public health

Add further rows as necessary* You should include details of any future consultations and any actions to be undertaken to mitigate negative impacts.

** Monitoring: You should state how the impact (positive or negative) will be monitored; what outcome measures will be used; the known (or likely) data source for outcome measurements; how regularly it will be monitored; and who will be monitoring it (if this is different from the lead officer).



4. Review

In this section you should identify how frequently the EqHIA will be reviewed; the date for next review; and who will be reviewing it.

Review: Annually

Scheduled date of review: September 2023

Lead Officer conducting the review: Darren Bindloss

**Expand box as required*

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CABINET

Subject Heading:

Home to School Transport Policy Consultation

Cabinet Member:

Councillor Oscar Ford

SLT Lead:

Tara Geere

Report Author and contact details:

*Trevor Cook, 01708 431250,
trevor.cook@[havering.gov.uk](mailto:trevor.cook@havering.gov.uk)*

Policy context:

This is a change in the existing School Transport Policy to offer alternative options to parents/carers to get their child to school

Financial summary:

This Policy change will enable the service to meet its MTFS target over the next 4 years of £1.4m

Is this a Key Decision?

*Indicate grounds for decision being Key:
(a) Expenditure or saving (including anticipated income) of £500,000 or more*

When should this matter be reviewed?

September 2024

Reviewing OSC:

People OSSC

The subject matter of this report deals with the following Council Objectives

People - Things that matter for residents X

Place - A great place to live, work and enjoy X

Resources - A well run Council that delivers for People and Place. X

SUMMARY

In recent years, Havering has experienced a significant and continued increase in the number of requests for an Education Health and Care Plan (EHCP) and the number of EHCPs being issued. The number has increased from 1,328 in 2017/18 to 2,189 in 2021/22, a cumulative increase of 861, or 62% based on 2017/18 levels. This increase is forecast to increase further, and we expect to have over 3,200 by 2025/26.

This increase in EHCPs has also resulted in a significant increase in demand for transport assistance, and spend has exceeded budgets for a number of years, despite various mitigations being introduced. The pandemic impacted on spend as travel was disrupted due to the various periods of lockdown, which meant that spend was suppressed in 2020/21 and 2021/22, but spend in 2022/23 was £5.5m, against a budget of £2.7m – an overspend of £2.8m.

The DfE has recently launched new Home-to-school travel statutory guidance, which requires the Local Authority to review its existing policies.

We currently support around 600 individuals up to 25 years old with Special Educational Needs and Disabilities. It tends to be parents applying for young people up to 16 then individuals post 16 up to 25 subject to individual's capacity and ability.

The aim of the project is ultimately to deliver a more personalised transport assistance service, whilst delivering savings of £1.4m over four years as a minimum. We aim to introduce new policies to meet the new statutory guidance from the DfE for the relevant age groups.

RECOMMENDATIONS

Cabinet is recommended to agree to consult on the attached draft Home to School Transport policy

REPORT DETAIL

1. Havering Council currently offers advice, support and assistance to eligible children and young people travelling between home and school/college in accordance with the criteria set out in our [home to school travel assistance policy](#).
2. In recent years, Havering has experienced a significant and continued increase in the number of requests for an Education Health and Care Plan (EHCP) and the number of EHCPs being issued. The number has increased from 1,328 in 2017/18 to 2,189 in 2021/22, a cumulative increase of 861, or 62% based on 2017/18 levels. This increase is forecast to increase further, and we expect to have over 3,200 by 2025/26.
3. This increase in EHCPs has also resulted in a significant increase in demand for transport assistance, and spend has exceeded budgets for a number of years, despite various mitigations being introduced. The pandemic impacted on spend as travel was disrupted due to the various periods of lockdown, which meant that spend was suppressed in 2020/21 and 2021/22, but spend in 2022/23 was £5.5m, against a budget of £2.7m – an overspend of £2.8m.
4. The purpose of this report is to gain approval for a consultation and to ensure that the process is legally compliant.
5. A review of existing policies in other boroughs (Appendix A) has shown that Havering is an outlier in many aspects. For example, many do not provide transport assistance if the school is the parental choice and an alternative school is closer. Many also seek financial contributions for pupils who are post-16 but require transport. All boroughs use the statutory distance criteria, but passenger assistants are not universally provided. Most boroughs promote the use of travel training and fuel re-imburement, and whilst most state that a seat on a passenger bus and/or taxi are exceptional, the majority of children in Havering access transport assistance in this way.
6. It is recommended that the policy is refreshed, and the main changes to the policy will be as follows:
 - Make it clear within the policy that sustainable, cost effective levels of support will be promoted and offered to families, and that the first offer of transport assistance would be the option that would incur the least cost to the Council.
 - Introduce flexible models of transport assistance which would allow families to support/share transport – for example car-pooling so that a parent could escort more than one child.
 - Establish a single team to oversee this and monitor the home to school transport arrangements which is currently split in three separate areas. In

addition to add 2 additional staff to manage the assessment of families and support in creating cost effective options with the personal transport budget.

- All applications would be subject to an initial face-to-face assessment, looking at existing family support arrangements, and resilience, and discussing the best options for the family.
- Completely remove the provision of taxis as a travel assistance option, and promote the offer of a personal budget/direct payment (based on individualised options less than the equivalent private taxi rate) to families so they can organise their own transport.
- Significantly reduce the numbers of children and young people accessing a seat on a bus by introducing clear eligibility criteria and expectation that parents organise their own transport (with financial support) unless the needs of the child (not family) can be evidenced through the initial face-to-face assessment.
- Promote the allocation of a personal budget/direct payment to families so they can organise their own transport, including paying for a travel card for parent to escort their child to school/college using public transport.
- Develop robust monitoring of personal budgets, and reconcile against school attendance to ensure usage/spend is appropriate.
- Increase the number of families using fuel reimbursement, by increasing the rate and by offering incentives for car sharing (transporting more than one young person that attends the same school).
- Remove the automatic provision of a passenger assistant (due to age or need), and provide a personal budget so the family can organise their own support (funded at personal assistant rate).
- Increase the number of young people accessing travel training by making this the default offer, and restricting access to other models of transport assistance until travel training has been completed.
- Introduce a model for charging for Post-16 transport assistance.
- Increase the number of muster/collection points to reduce bus journey times, which will impact on the cost of routes and also benefit the environment.

7. The table below illustrates the savings that could be achieved through making the policy changes above relating to the removal of taxis as a travel assistance option based on the top ten taxi charges in the current academic year;

TOP TEN TAXI CHARGES							
	Mileage Distance	Daily Taxi Cost	With Escort?	Fuel Reimbursement Cost Per Day (A)	Direct Payment (Based on UBER Charges) (B)	Possible savings against (A)	Possible savings against (B)

Cabinet, 12 September 2023

1	16.6 miles	£254 (£48,260 over 190 days)	Yes	£29.21 (£5,549.90 over 190 days)	£33.60 (£5,376 over 190 days)	£224.79 (£42,710.10 over 190 days)	£220.40 (£41,876 over 190 days)
2	18.2 miles	£225 (£42,750 over 190 days)	Yes	£32.03 (£6,085.70 over 190 days)	£39.94 (£7,588.60 over 190 days)	£192.97 (£36,664.30 over 190 days)	185.06 (£35,161.40 over 190 days)
3	21.3 miles	£207.90 (£39,501 over 190 days)	Yes	£37.48 (£7,121.20 over 190 days)	£37.92 (£7204.80 over 190 days)	170.42 (£32,379.80 over 190 days)	169.98 (£32,296.20 over 190 days)
4	16.0 miles	£190 (£36,100 over 190 days)	Yes	£28.16 (£5,350.40 over 190 days)	£30.53 (£5,800.70 over 190 days)	161.84 (£30,749.60 over 190 days)	159.47 (£30,299.30 over 190 days)
5	11.6 miles	£170 (£32,300 over 190 days)	Yes	£20.41 (£3,887.90 over 190 days)	£20.83 (£3,957.70 over 190 days)	149.59 (£28,422.10 over 190 days)	149.17 (£28,324.30 over 190 days)
6	25.8 miles	£240 (£45,600 over 190 days)	Yes	£45.41 (£8,627.90 over 190 days)	£46.17 (£8,772.30 over 190 days)	194.59 (£36,972.10 over 190 days)	193.83 (£36,827.70 over 190 days)
7	12.4 miles	£160 (£30,400 over 190 days)	Yes	£21.82 (£4,145. over 190 days)	£25.52 (£4848.80 over 190 days)	138.18 (£26,254.20 over 190 days)	134.48 (£25,551.20 over 190 days)
8	14.7 miles	£150 (£28,500 over 190 days)	Yes	£25.87 (£5,485.30 over 190 days)	£26.64 (£5061.60 over 190 days)	124.13 (£23,584.70 over 190 days)	123.36 (£23,438.40 over 190 days)
9	14.4 miles	£155 (£29,450 over 190 days)	Yes	£25.34 (£4,814.60 over 190 days)	£43.47 (£8,259.30 over 190 days)	129.66 (£24,635.40 over 190 days)	111.53 (£21,190.70 over 190 days)
10	22.7 miles	£228 (£43,320 over 190 days)	Yes	£39.95 (£7,590.50 over 190 days)	£42.11 (£8,000.09 over 190 days)	188.05 (£35,729.50 over 190 days)	185.89 (£35,319.10 over 190 days)

The tables below illustrate the savings that could be achieved through making the policy changes above relating to the removal of a seat on a bus as a travel assistance option based on two of the routes in the current academic year;

TRAVEL OUT-OF-BOROUGH BUS						
Students	Mileage Distance	Daily Cost of Transport	Fuel Reimbursement Cost Per Day (A)	Direct Payment (Based on UBER Charges) (B)	Possible savings against (A)	Possible savings against (B)
1	19.1 miles	£81.67	£33.62	£36.26	£48.05 (£9,129.50 over 190 days)	£45.41 (£8,627.90 over 190 days)
2	20.7 miles	£81.67	£36.43	£38.98	£45.24 (£8,595.60 over 190 days)	£42.69 (£8,111.10 over 190 days)
3	19.5 miles	£81.67	£34.32	£37.13	£47.35 (£8,996.50 over 190 days)	£44.54 (£8,462.60 over 190 days)
4	10.2 miles	£81.67	£17.95	£22.43	£63.73 (£12,106.80 over 190 days)	£59.24 (£11,255.60 over 190 days)
5	9.8 miles	£81.67	£17.25	£22.88	£64.42 (£12,239.80 over 190 days)	£58.79 (£11,170.10 over 190 days)
6	12.7 miles	£81.67	£22.35	£32.50	£59.32 (£11,270.80 over 190 days)	£49.17 (£9,342.30 over 190 days)

TRAVEL IN-BOROUGH BUS						
Students	Mileage Distance	Daily Cost of Transport	Fuel Reimbursement Cost Per Day (A)	Direct Payment (Based on UBER Charges) (B)	Possible savings against (A)	Possible savings against (B)
1	1.6 miles	£69.17	£2.82	£7.31	£66.35 (£12,606.50 over 190 days)	£61.86 (£11,753.40 over 190 days)

					over 190 days)	over 190 days)
2	1.3 miles	£69.17	£2.29	£6.69	£66.88 (£12,707.20 over 190 days)	£62.48 (£11,871.20 over 190 days)
3	1.7 miles	£69.17	£2.99	£6.69	£66.18 (£12,574.20 over 190 days)	£62.48 (£11,871.20 over 190 days)
4	2.2 miles	£69.17	£3.87	£7.05	£65.30 (£12,407 over 190 days)	£62.12 (£11,802.80 over 190 days)
5	1.1 miles	£69.17	£1.94	£6.69	£67.23 (£12,773.70 over 190 days)	£62.48 (£11,871.20 over 190 days)
6	0.9 mile	£69.17	£1.58	£6.69	£67.59 (£12,842.10 over 190 days)	£62.48 (£11,871.20 over 190 days)

8. As can be seen from the examples above, the Council is currently being charged a much higher rate For each route (taxis and a seat on a bus) when compared the costs associated with fuel reimbursement or The private taxi hire rates.

9. Some of these increased costs could be associated with the need to provide an escort. Therefore, it is recommended to provide financial assistance to eligible families so that they can provide their own passenger assistants.

10. However, it should be noted that the current buses are able to transport children with mobility issues And/or wheelchair users, which may not be able to be serviced by private taxis. In addition, the buses provide A consistent and calm environment for the children being transported, which means that children arrive at school ready for the day. The movement to private taxis could risk this position as the children could be transported by different taxis and/or drivers, which could result in children arriving at school distressed and not ready to engage in learning.

11. PTS currently pay escorts £17.74 per hour, and PTS escorts are contracted to 15 hours per week, term Time only, but they also pick up overtime hours outside this. Currently, taxi companies are charging from £14.50 - £38.00 depending on the journey time, and this is built into the cost of the journey. The current DPS Rate for children is £12.67 per hour and if we were to pay this to families, we could be saving £1.83 per hour compared to the lowest taxi rate, and £5.07 compared to the PTS hourly rate.

12. As well as the proposed changes to the policy detailed above, there is also a need to develop the Processes around application, awards, and appeals if these changes were to be adopted. For example, it is recommended that there is Member input into the Appeals process so that they are able to respond to any

complaints that follow the appeals process.

13. Savings proposed below assume that the baseline budget for 2023/24 is at least equivalent to spend in 2022/23, but uplifted in line with expected increase in demand (9%) – baseline £6.141m budget;

2023/24	2024/25	2025/26	2026/27	4 Year total
£m	£m	£m	£m	£m
0.100	0.200	0.500	0.600	1.400

14. There is a need for investment to develop the infrastructure for managing and developing travel assistance.

15. This investment would also allow for systems and processes to be developed to support the commissioning of transport across social care – i.e. emergency transport required for young people identified via social workers. The investment will also take into account and align with other developments, such as developing education and placements in the borough.

REASONS AND OPTIONS

Reasons for the decision:

To provide the Parents/Carers of Children within the Borough a voice in the changes to the Home-to- school transport through a consultation process.

To ensure all Policies affecting age groups up to 25 in line with the new statutory guidance as issued by the DfE

To manage the cost of Home-to-school Transport to prevent a cost escalation with existing offers to Parents.

To Achieve the MTFs savings Target of £1.4m over the next 4 years.

Improve the options to Parents and Carers on how they can enable their children are able to get to school.

At this stage it is not intended to look to recruit the two additional staff for the establishment of the new team as we will return with the request for additional staff to the team whether recruited internally or externally.

Other options considered:

The only alternative approach is doing nothing and maintaining the current policy which would not achieve savings and with the impending numbers in the current years of SEND young people will see the budget escalate beyond the current spend levels.

Increasing PTS was an option but is cost prohibitive with the number of investment in multiple more roots

Developing a framework with Taxi firms was looked into but this was also cost prohibitive.

IMPLICATIONS AND RISKS

Financial implications and risks:

Without this approval to move to consultation we will not be able to achieve the MTFS target and attain control of the transport costs

Legal implications and risks:

The revised statutory guidance provides:

“Where they propose changes to their school travel policy which may affect children’s eligibility for transport, local authorities should consult locally. As a minimum, this should include consulting:

- schools whose pupils will be affected by the proposed changes, including those located in other local authority areas;
- parents whose children will (or may) be affected by the proposed changes, including those whose children attend school in a neighbouring authority, and those whose children may be affected in the future – for example, because they live in the catchment area of, or attend the feeder school of, a school affected by the proposed changes; and
- the local Parent Carer Forum.

Consultation should last for at least 28 working days during term time. Local

authorities may not consider it necessary to consult on minor amendments or corrections.

Local authorities should give careful consideration to:

- the impact proposed changes to their policy will have on parents' choice of school, particularly where travel arrangements have been made to support parents' preference for their children to attend a school with a designated religious character (some such arrangements are associated with long-standing local agreements about the siting of schools);
- the financial impact the changes will have on affected families, paying particular attention to the potential impact of any changes on children from low-income families;
- the impact the changes will have on people with protected characteristics

Wherever possible, local authorities should phase in changes so that children who begin attending a school under one set of travel arrangements continue to benefit from those arrangements until they leave that school.”

The proposal to commence a consultation is in line with the above requirements. Consultees must be given sufficient information and time to respond before their comments are conscientiously taken into account by the final decision maker.

Human Resources implications and risks:

Additional 2 staff required to a new Home to School Transport Team as well as the move of existing staff from other functions within the council currently providing the same support. This will be explored at a later date and when establishing the team will return with a separate report to proceed with the recruitment.

Equalities implications and risks:

The EQIA shows an impact on age and disability areas through providing a wider choice and range of opportunities to get to and from school at the discretion of the parents or carers. It will give a greater flexibility than a menu of choices currently on offer as well as support to parents to make the best choices to achieve the desired outcomes for children and young people.

Health and Wellbeing implications and Risks

The risks to the mental well-being of staff will be affected trying to manage and maintain the current process and maintain the cost implications

Trying to promote physical activity through walking to school and reducing taxi usage will impact on the health and wellbeing of those children who are physically able to walk to school

ENVIRONMENTAL AND CLIMATE CHANGE IMPLICATIONS AND RISKS

With the proposals on the Home to School we aim to reduce the number of taxis being utilised on a daily basis and there reduce the emissions that result from this reduction supporting cleaner air quality.

BACKGROUND PAPERS

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This Report is part exempt and Appendices A,B and C are not available for public inspection as they contain or relate to exempt information within the meaning of paragraph 3 of Schedule 12A to the Local Government Act 1972. They are exempt because they relate to information relating to the financial or business affairs of any particular person (including the authority holding the information) and the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

CABINET

Subject Heading:

REPORT INTO ADULTs WITH
DISABILITIES PROVISIONS TOPIC
GROUP

Cabinet Member:

Gillian Ford – Deputy Leader of the
Council and Cabinet Member for Adults
and Health

SLT Lead:

Barbara Nicholls - Strategic Director of
People

Report Author and contact details:

Anisah Rahman– National Management
Trainee
Anisah.Rahman@havering.gov.uk

Policy context:

The report deals with information
previously requested by the Peoples
Overview Scrutiny and Sub-Committee.

Financial summary:

Should the decision be agreed that will be
the subject of a separate Report-
Recommendation 1 would need further
work to identify an appropriate budget

Is this a Key Decision?

No- a non-key decision

When should this matter be reviewed?

March 2024- Ahead of the new financial year and subject to Cabinet approving the initial recommendations highlighted in the report- the appropriate considerations will be undertaken to assess the job post grading and position under the new TOM structure.

Reviewing OSC:

People OSSC

The subject matter of this report deals with the following Council Objectives

People - Things that matter for residents X

Place - A great place to live, work and enjoy

Resources - A well run Council that delivers for People and Place.

SUMMARY

This report contains the findings and recommendations that have emerged after the Topic Group scrutinised the topic selected by the Committee in December 2022.

RECOMMENDATIONS

That Cabinet:

1. Note the report and recommendation of the adults with disabilities provisions Topic Group (attached):
2. Cabinet agrees in principle that, subject to sufficient funding being available, Havering to employ a specialist Supported Employment Adviser for adults with disabilities to work alongside day provision and support transition to internships and paid employment. If agreed, authorisation to create this post will be delegated to the appropriate member of the Executive Leadership team. The job role to include:
 - a. Improving employability opportunities and the delivery of such routes ensuring accessibility for all with the Council engaging with adults with disabilities by supporting and signposting these opportunities, and creating relationships with local businesses to employ adults with disabilities.
 - b. Creating an action plan/recommendations aligned to actions in the All Age Autism Strategy
 - c. Developing schemes with local businesses to help provide employment opportunities for adults with disabilities over the age of 25
 - d. Encouraging employers to complete the Oliver McGowan mandatory training in line with national legislation passed July 2022
 - e. Expanding Council operated services for jobs i.e Avelon Day Centre, explore options around social enterprise schemes
3. Agrees that a review be undertaken of Havering's local offer (covering ages 16-25) and amended, following the statutory requirements, to ensure that it is a comprehensive and detailed with signposting to identify current apprenticeships available for young adults with disabilities.
4. Agrees that the Council should create "Quality Standards" for providers within Havering, including frequency of monitoring and inspection and then monitor and inspect providers for compliance with them, following benchmarking against other North East London boroughs. These Quality Standards should address the quality of provisions and their individual, tailored offer to service users. Agrees that the Council should provide, if resources permit, a

specialised meaningful set of activity programs for 25+ residents with disabilities - with person-specific requirements to help improve the quality of the services provided for this group.

REPORT DETAIL

At its meeting in December 2022, the Peoples' Overview & Scrutiny Sub Committee agreed to establish a Topic Group to review the adults with disabilities provisions within Havering.

Attached is a copy of the Topic Group's report. The report includes details of the research that it undertook in reaching the conclusions and recommendations set out.

Appendices A- DFN Project Search

Appendices B- Report Temp for LA's Adult Programme

Appendices C- DFN Projected Costs

REASONS AND OPTIONS

Reasons for the decision:

The Council should continue to support employment of adults with disabilities and enable wider employment opportunities with the borough. Improving employability opportunities and the delivery of such routes ensuring accessibility for all with the Council engaging with adults with disabilities by supporting and signposting these opportunities, and creating relationships with local businesses to employ adults with disabilities.

Other options considered:

An option that was considered was implementing a Local Authority adult programme run by DFN Project Search, however the financial commitment and estimated running costs were high- as seen in the Appendices attached.

IMPLICATIONS AND RISKS

Financial implications and risks:

Recommendation 1 in this report will have financial implications, further work and a restructure report will need to be undertaken in order to identify the full financial implications and appropriate budget to identify the resources to fund the recommendation. The level of funding required would be established with the grading of the post. This service funding could be considered as part of the ongoing TOM work. Recommendations 2 and 3 have no financial implications.

Legal implications and risks:

The Local Authority has duties under the Children and Families Act 2014 to ensure that any educational provision required for an adult in the age range 18-25 and set out in an Education, Health and Care Plan (EHCP) is provided.

Section 181 of the Health and Care Act 2022 introduces a requirement into the Health and Social Care Act 2008 and regulation 18 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 (the 2014 Regulations) that, from 1 July 2022, service providers registered with the CQC must ensure their staff receive training on learning disability and autism appropriate to their role. It applies to all registered providers of all health and adult social care in England and is (known as “McGowan training”).

The statutory scheme for the local offer is set out in Section 30 Children and Families Act 2014 and under subsection (5) a local authority must keep its local offer under review and may from time to time revise it. The proposals are in line with this provision but it must be noted that there are requirements about consultation whenever the offer is to be amended.

The other proposals do not appear to be statutorily required but it is open to the Council to agree them using their general powers under s 1 Localism Act 2011. Other than the above comments there appear to be no legal implications in approving the recommendations.

The Committee cannot make an executive decision to implement the recommendation in this Report and if this is to be approved it will have to be

considered by an executive decision maker before it can be implemented. It will of course have financial implications which may be relevant for any ultimate executive decision maker to consider.

Human Resources implications and risks:

The recommendations will require the creation of and recruitment to a new post of Supported Employment Adviser for Adults with disabilities which will be managed in accordance with the Council's policies and procedures.

Equalities implications and risks:

None directly although the successful adoption of the recommendations in the Topic Group's report would serve to support adults with disabilities with employment and working skills in Havering.

An EA is not necessary at this early stage in the process as this decision suggests recommendations which may or may not be agreed to, if they are agreed to, an EA would look to be completed.

Health and Wellbeing implications and Risks

Employment has positive impacts on health and wellbeing of individuals including those with disabilities. Access to Work Advisers are known to be effective when they are trained to the required standards and are supported by the local system. Therefore, adequate training and management support must be ensured to see results. Volunteering as health champions by the adults with disabilities may not only strengthen their job applications in care sector, but will increase their own knowledge on health and wellbeing which take can subsequently to support wellbeing in their workplaces.

ENVIRONMENTAL AND CLIMATE CHANGE IMPLICATIONS AND RISKS
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There are no environmental and climate change implications and risks
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BACKGROUND PAPERS

None

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REPORT OF PEOPLE OVERVIEW & SCRUTINY SUB-COMMITTEE ADULT WITH DISABILITIES PROVISIONS TOPIC GROUP

BACKGROUND

1. At its meeting on 6 December 2022, the People Overview & Scrutiny Sub-Committee commissioned a Topic Group for an insight into the current provisions available for adults with a range of disabilities within Havering including learning disabilities and autism, but also people with physical and sensory disabilities and mental health issues.
2. The terms of this review related to the impact on adults with disabilities over the age of 25 years old, exploring the avenues into employment and opportunity within Havering.
3. The Group established a timetable to hold meetings with Council officers and third sector providers.
4. The Topic Group consisted of Councillors Darren Wise (Chairman) Jacqueline McArdle and Julie Lamb, (Special) Statutory member representing Special Educational Needs and Disabilities (SEND) parents. On many occasions due to other competing priorities, Councillor Darren Wise and Julie Lamb carried out the scrutinising of the meetings and objectives.
5. The Group met fortnightly between January 2023 to March 2023 and has now concluded its review; identifying recommendations and findings which are detailed in this report.

THE SCOPE OF THE REVIEW

6. The focus for this Topic Group concentrated on the following key areas:
 - To understand the current access routes to education and employment as well as social care provisions for adults with disabilities and to assess their strengths and weaknesses
 - Create and then monitor a local authority quality assurance process and written framework for current and future adult day service provisions
 - Signposting for current 16-25 provisions and employment opportunities and improving the content of the local offer
 - Investigate current employment provisions for 25+ and explore the areas to improve employability opportunities

- Scrutinise Havering Borough's own delivery to modernise/update the current service model in place

METHODOLOGY

7. The Group agreed that the list of people to be interviewed would comprise the following members of staff and external colleagues:

Carmel McKeogh, Director of Operations, DFN Project Search Foundation

Amanda Montague, Employment and Skills Team, LBH

Andrew Sykes, Service Manager for Disabilities, Adult Social Care, LBH

Samantha Saunders, Commissioning Programme Manager – Disabilities, Joint Commissioning Unit, LBH

8. Members were grateful for the commitment of staff and witnesses to the review, many of whom took time out of work hours to contribute to the review.

THE REVIEW

9. The notes of the topic group meetings and discussions are attached to this report. Set out under the heading **RECOMMENDATIONS** are the key issues that emerged from the topic group's scrutiny.

MEETINGS

10. The Topic Group met on nine occasions conducting the review between January to March 2023:

30th September 2022- Scope finalising

15th December 2022- Initial Plan Discussion

10th January 2023

19th January 2023- Discussion with DFN Project Search representative

7th February 2023- Discussion with Sam Saunders, Commissioning Programme Manager, JCU and Andrew Sykes, Services Manager, Disabilities Management Team

21st February 2023- Cost Evaluation of DFN Project Search within Havering

7th March 2023 – Discussion with Councillors Gillian and Oscar Ford

21st March 2023

27th March 2023

11. The first meeting held detailed discussions on the timeline and speakers to consult for the meetings. At the second meeting, a representative from DFN Project Search presented information on the programme (see Appendix A- DFN Presentation). After consulting with

the representative, the costs of running the adult programme were sent over (see Appendix B), alongside a spreadsheet from Amanda Montague into the start-up costs for the planning year and the annual cost of running a three-year pilot (see Appendix C). After a cost benefit analysis was taken into consideration, the group decided to withdraw it as a possible recommendation.

12. Officers from the Joint Commissioning Unit and Disabilities Management Team within Havering provided their involvement around quality assurance functions provided for adults with disabilities currently.

FINDINGS

13. Day Care Provisions and Quality Standards

Members consulted with Havering Officers managing the current adult day care provisions and shared concerns over the lack of quality assurance guidelines and frameworks in place for provisions for adults with disabilities. Members were pleased to hear Officers were carrying out initial benchmarking and identifying neighbouring boroughs who similarly do not have a quality standard in place but instead commit to yearly audits. Moving forward there is a working group for the North East London boroughs and a working group for London Wide Boroughs to discuss and implement a standard as a whole. Once the working groups are set up and a meeting held with Havering Officers, then they will report back with updates.

14. Employability Schemes and Transitioning Process

Members noted many of the current schemes in place for SEND provisions were allocated to those within the age group of 16-25 year olds due to the Education Health Care Plan funding available within the timeframe. Members considered the weakness in the lack of progression from internship to paid employment available for those aged 25+ years with disabilities, transitioned support from day provisions into paid employment, and the limitation of having three Officers dedicated to the general service of supporting unemployed adults into work who may or may not have disabilities. Members noted employing a specialist Supported Employment Adviser for adults with disabilities to work alongside day provision and support transition to internships and paid employment would be beneficial.

RECOMMENDATIONS

That Cabinet:

1. Note the report and recommendation of the adults with disabilities provisions Topic Group:
2. Cabinet agrees in principle that, subject to sufficient funding being available, Havering to employ a specialist Supported Employment Adviser for adults with disabilities to work alongside day provision and support transition to internships and paid employment. If agreed, authorisation to create this post will be delegated to the appropriate member of the Executive Leadership team. The job role to include:
 - a. Improving employability opportunities and the delivery of such routes ensuring accessibility for all with the Council engaging with adults with disabilities by supporting and signposting these opportunities, and creating relationships with local businesses to employ adults with disabilities.
 - b. Creating an action plan/recommendations aligned to actions in the All Age Autism Strategy
 - c. Developing schemes with local businesses to help provide employment opportunities for adults with disabilities over the age of 25
 - d. Encouraging employers to complete the Oliver McGowan mandatory training in line with national legislation passed July 2022
 - e. Expanding Council operated services for jobs i.e Avelon Day Centre, explore options around social enterprise schemes
3. Agrees that a review be undertaken of Havering's local offer (covering ages 16-25) and amended, following the statutory requirements, to ensure that it is a comprehensive and detailed with signposting to identify current apprenticeships available for young adults with disabilities.
4. Agrees that the Council should create "Quality Standards" for providers within Havering, including frequency of monitoring and inspection and then monitor and inspect providers for compliance with them, following benchmarking against other North East London boroughs. These Quality Standards should address the quality of provisions and their individual, tailored offer to service users. Agrees that the Council should provide, if resources permit, a specialised meaningful set of activity programs for 25+ residents with disabilities - with person-specific requirements to help improve the quality of the services provided for this group.

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