OVERVIEW AND SCRUTINY MANAGEMENT BOARD

MONDAY 20TH JANUARY, 2014

AT 6.00 PM IN COMMITTEE ROOM 2 THE COUNCIL HOUSE DUDLEY

If you (or anyone you know) is attending the meeting and requires assistance to access the venue and/or its facilities, could you please contact Democratic Services in advance and we will do our best to help you

> STEVE GRIFFITHS DEMOCRATIC SERVICES MANAGER Internal Ext – 5235 External – 01384 815235 E-mail – steve.griffiths@dudley.gov.uk

You can view information about Dudley MBC on www.dudley.gov.uk



IMPORTANT NOTICE

MEETINGS IN DUDLEY COUNCIL HOUSE

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Please turn off your mobile phones and mobile communication devices during the meeting.

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Directorate of Corporate Resources

Law and Governance, Council House, Priory Road, Dudley, West Midlands DY1 1HF Tel: 0300 555 2345 Fax: 01384 815202 www.dudley.gov.uk



Your ref:

Our ref:

Please ask for: Richard Sanders Telephone No. (01384) 815236

10th January, 2014

Dear Councillor

<u>Overview and Scrutiny Management Board</u> <u>Monday, 20th January, 2014 – 6.00PM</u>

You are requested to attend a meeting of the Overview and Scrutiny Management Board to be held on <u>Monday, 20th January, 2014 at 6.00pm</u> in <u>Committee Room 2</u> at the Council House, Dudley to consider the business set out in the agenda below.

The agenda and public reports are available on the Council's Website <u>www.dudley.gov.uk</u>.

Yours sincerely

Director of Corporate Resources

<u>A G E N D A</u>

1. APOLOGIES FOR ABSENCE

To receive apologies for absence from the meeting.

2. APPOINTMENT OF SUBSTITUTE MEMBERS

To report the appointment of any substitute members serving for this meeting of the Board.

3. DECLARATIONS OF INTEREST

To receive Declarations of Interest in accordance with the Members' Code of Conduct.

4. MINUTES

To approve as a correct record and sign the minutes of the meeting of the Committee held on 26th November, 2013.

5. CHILDREN'S CENTRES IN DUDLEY

To consider the joint report of the Lead Officer and Interim Director of Children's Services.

6. TO ANSWER QUESTIONS UNDER COUNCIL PROCEDURE 11.8 (IF ANY).

To: All Members of the Overview and Scrutiny Management Board:

Councillor Ridney (Chair); Councillor Tyler (Vice-Chair) Councillors A Ahmed, Blood, Boleyn, Caunt, Hale, Islam, James, Kettle and Marrey.

OVERVIEW AND SCRUTINY MANAGEMENT BOARD

<u>Tuesday 26th November, 2013 at 6.00 p.m.</u> in Committee Room 2, The Council House, Dudley

PRESENT:-

Councillor Ridney (Chair) Councillor Tyler (Vice Chair) Councillors Blood, Boleyn, Caunt, Islam and James

OFFICERS:-

Assistant Director (Housing Strategy and Private Sector) (Lead Officer to the Board); Director of Corporate Resources, Assistant Director (Law and Governance) and the Democratic Services Manager (Directorate of Corporate Resources)

10. <u>APOLOGIES FOR ABSENCE</u>

Apologies for absence from the meeting were submitted on behalf of Councillors Hale and Marrey.

11. DECLARATIONS OF INTEREST

No Member declared an interest in any matter to be considered at this meeting.

12. <u>MINUTES</u>

RESOLVED

That the minutes of the special meeting of the Board held on 25th July, 2013, be approved as a correct record and signed.

13. INTERIM POSITION ON THE NEW SCRUTINY ARRANGEMENTS

A joint report of the Director of Corporate Resources and the Lead Officer was submitted giving an interim position on the Council's revised scrutiny arrangements that had been in operation since June, 2013. The report indicated a general level of acceptance that the new scrutiny arrangements had built substantially on those previously operated by the Council. The new approach involved focussing on a smaller number of major issues; aligning scrutiny functions with Directorate structures; revised reporting arrangements and a greater freedom for Chairs and Vice-Chairs and Scrutiny Committee Members to adapt their approach to conducting individual scrutiny reviews.

The annual review process aimed to ensure that the scrutiny arrangements continued to be aligned to the needs of the Council whilst remaining adaptable and flexible to changes in circumstances.

The interim review dealt with constitutional and governance arrangements; key scrutiny themes; comments in relation to the work of each individual Scrutiny Committee and issues for further consideration by the Board.

Members discussed the following specific issues:

 Clarification in regard to the scrutiny of budget proposals by individual Scrutiny Committees and in particular, the Corporate Performance Management, Efficiency and Effectiveness Scrutiny Committee. The Director of Corporate Resources acknowledged the need to clarify and refine the budget scrutiny process for the future.

It was suggested that Scrutiny Committees should focus on the detailed scrutiny of individual Directorate budget proposals whilst retaining some flexibility for cross-cutting issues. Following the cycle of Scrutiny Committees in November, the Overview and Scrutiny Management Board could then scrutinise the overall budget proposals on a strategic basis.

Further consideration would be given to this proposal in the annual review taking account of the timings involved with the budget proposals and the need to avoid potential for duplication.

 In connection with the scrutiny of budget proposals and other financial issues, comments were made on the level of skills and knowledge required to undertake in-depth scrutiny. The Board supported further Member development and training in this complex area of work.

It was considered that the involvement of a wider group of Members in scrutinising budget proposals would be a positive development to assist Members in understanding the complexities involved with the Council's budgetary process. Issues concerning the ability of Directorate officers to give full and meaningful responses at meetings, particularly arising from questions on the Quarterly Corporate Performance Management report. A view was expressed that a senior officer from each Directorate should attend the Committee meeting. The arrangements for circulating papers made it impractical for Members to submit advance questions in all cases.

The Director of Corporate Resources indicated that the formatting of the quarterly report and the timing of its distribution would be considered further.

• The lack of a facility under the Constitution for reporting back on decisions taken by external bodies on which the Leader represented the Council (eg: West Midlands Joint Committee and the Local Enterprise Partnership).

Members supported the development of a more robust feedback mechanism either through the Cabinet or Scrutiny Committees. This would be considered in the annual review process.

- The need to ensure that Scrutiny Committees had freedom to influence the topics they wished to scrutinise in the Annual Scrutiny Programme and during the municipal year. It was acknowledged that the programme for 2013/14 had been formulated as a starting point and this could be developed in consultation with Members.
- Scrutiny Committees would retain an element of discretion over the number of topics they wished to scrutinise, however, it was important that the workloads of Committees remained manageable.
- The Board supported the view that the content of Scrutiny Committee minutes should be more extensive that certain other meetings and record additional detail. Whilst it was accepted that verbatim minutes were unnecessary and excessive, the view was that Scrutiny Committee minutes should be sufficiently detailed to record the thread of the discussion and capture the essence of the debate. The Democratic Services Team had acknowledged these views.
- The Board was of the view that, for the next municipal year, meetings of Scrutiny Committees should be programmed throughout the whole year in line with the established cycle of Committees. Additional formal and/or informal meetings or working groups could be arranged as and when necessary.
- The Lead Officer identified issues relating to the development of a more robust and consistent mechanism for Lead Officers briefing Chairs and Vice-Chairs on key issues being considered by Scrutiny Committees.

The Director of Corporate Resources acknowledged all the comments made by Members and further work would be undertaken to develop the scrutiny arrangements. The issues identified would be incorporated in the annual report to be presented to the Board in February, 2014. It was suggested that, as part of the annual review, a wider range of comments could be sought, including those of all elected Members.

RESOLVED

- (1) That the issues set out in the interim report, together with the additional issues identified above, be included in the annual review of the Council's scrutiny arrangements.
- (2) That the Lead Officer and the Director of Corporate Resources submit a further report to the Board in February, 2014 to enable any recommendations on the future operation of the scrutiny arrangements to be submitted to the Council in advance of the 2014/15 municipal year.

14. FORWARD PLAN OF KEY DECISIONS

The Board noted a report of the Director of Corporate Resources on the forward plan of key decisions for the four-month period commencing on 1st December, 2013.

At the conclusion of the meeting, the Chair indicated that the Leader of the Council had requested her to make arrangements for the Overview and Scrutiny Management Board to scrutinise the consultation on the future of Sure Start Children's Centres in Dudley (Key Decision Reference 0589). The consultation period was due to close on 3rd January, 2014.

RESOLVED

That a meeting of the Overview and Scrutiny Management Board be provisionally arranged on Monday, 20th January, 2014 at 6.00pm to consider the scrutiny of the consultation on the future of Sure Start Children's Centres in Dudley

The meeting ended at 7.15 p.m.

CHAIR



Overview and Scrutiny Management Board – 20th January 2014

Preliminary report of the Interim Director of Children's Services and the Lead Officer

Children's Centres in Dudley MBC

Purpose of Report

1. To advise Overview and Scrutiny Management Board of the legal framework under which the Children's Centres offer is delivered, the background to Children's Centres service delivery and the consultation process which has taken place to inform future service delivery within a reduced budget. The report detailing the consultation responses and a proposal for a new model for the Children's Centres offer will be produced following the closure of the consultation period on 10th January and the analysis of responses.

Background

- 2. The provision of Children's Centres is a statutory requirement under The Apprenticeships, Skills, Children and Learning Act 2009. The Children's Centres offer is also underpinned by law in the Childcare Act 2006.
- 3. The Local Authority is the accountable body responsible for the delivery of the Children's Centres offer.
- 4. The overall aim of Children's Centres is to identify, reach and help those children under 5 and their families who are in greatest need of support. This should be achieved by providing a range of both universal and targeted services in partnership with both statutory and voluntary agencies.
- 5. In Dudley there are currently twenty Children's Centres which have been directly managed by the Local Authority since 31st March 2013. Up until 2013, all of the Centres were commissioned through contracts and performance managed by the Local Authority. **A list of Children's Centres is shown at Appendix 1**
- 6. All centres offer some basic accommodation but vary considerably in size. The 3 initial Sure Start local programme buildings (Brierley Hill, Kates Hill and Sledmere and Butterfly) are the most extensive as their funding was the most generous. Phase 1 Centres offer additional accommodation in the form of full day care provision. Standard accommodation for all centres includes:
 - Defined entrance and reception area
 - Multi-purpose room (for training, meetings etc)
 - Interview room (with facilities for health staff and others to do 1:1 work)
 - Small office
 - Kitchen
- 7. Facilities at centres can be used by staff from a range of agencies, for delivery of services and activities.

- 8. Children's Centres staff deliver their services in a variety of different places. All services are not provided within the confines of the centre building. Much of the one to one family support is provided through outreach in the families' own homes and some services such as Stay and Play sessions are delivered in primary schools sited within their Reach areas.
- 9. An immediate saving of £390k in 2013/2014 was made by bringing the direct management of Children's Centres back in-house to meet the Medium Term Financial Strategy.

Reach area

- a. Each of our Children's Centres has a defined 'reach area' which is made up of a cluster of 'super output areas' (SOAs) containing around 900 children under 5. The numbers of Under 5's in the borough is rising year on year currently.
- b. These areas are not intended to restrict access of parents and children to services. Parents are able to access services at a location which is most appropriate to their needs. However, priority is given to children and families living within the Reach area and also family support/outreach workers are allocated according to Reach.

Core Purpose

- 10. The latest guidance about the core purpose of Children's Centres was issued to local authorities in September 2011. The guidance requires Children's Centres to focus much more effectively on those families in greatest need with an emphasis on:
 - a. Child development and school readiness
 - b. Parenting aspirations and parenting skills
 - c. Child and family Health and life chances
- 11. Children's Centres provide significant support to children who are subject to Child Protection Plans and who are in the category of Children in Need.
- 12. In December 2013 government indicated that the core purpose of Children's Centres is to be reviewed and reshaped to focus on achievable outcomes, and to make clear whether centres should prioritise services for children or for parents.
- 13. Government is also developing a new national outcomes framework to increase the accountability of individual centres.

External Regulation

14. Children's Centres need to evaluate the impact of the services they are providing. They are performance managed against the Local Authority service specification and Ofsted's framework. 15. In Dudley there have been 15 Ofsted inspections to date. One of them was judged to be **Outstanding**, eleven were judged to be **Good** and three judged to be **Satisfactory**.

Partnership Working

- 16. Children's Centres have been established with the principle of Working Together with partner agencies to ensure that a holistic approach is taken to meet the needs of the children and families with whom they work. Due to the re-focussing of service delivery towards more targeted work with vulnerable families partnerships have become even more important as a means of identifying and engaging with these families through the universal services partners are delivering in Children's Centres e.g. Health Visitor clinics.
- 17. The recruitment of volunteers is of significant importance to the work of the Children's Centres and all of the centres have a thriving volunteer network. (More information is available in the Scrutiny Report of 23rd September, 2013 see Committee Management Information System)

Children's Centre Consultation Process

- 18. The consultation on the overall Council's budget proposal included the proposals around the restructuring Children's Centres.
- 19. As Children's Centres are a statutory provision, it is laid down in the legislation and guidance on Children's Centres that local authorities must conduct a consultation exercise 'before any significant change' is made to the services being provided by Children's Centres, which is why the Local Authority initiated the Children's Centres consultation process.
- 20. The consultation document was issued on 12th November 2013 and is shown at **Appendix 2**.
- 21. Children's Services Scrutiny Committee met on 19th November, 2013. (Background paper Chair's report and resolution documents attached as **Appendix 3**).
- 22. On 26th November 2013, the Leader of the Council made the decision that no Children's Centres would be closed for the foreseeable future. This was as a result of initial feedback received from the consultation indicating public support for Children's Centres.
- 23. On 23rd December 2013, the Leader of the Council made the decision to extend the consultation period until 10th January 2014 to give the opportunity for as wide a response as possible.
- 24. At the time of writing this report the consultation is still live. A significant number of responses (in excess of 1000) have been received.

Finance

- 25. To date, each centre has been allocated a revenue budget which has been based on a formula which takes account of the following:
- Core budget (related to the running costs of the building and core staff costs) and a variable amount depending on:
- Numbers of children in the 'reach area'
- Level of disadvantage as indicated from selected factors in the Index for Multiple Deprivation
- 26. Dudley's funding formula has been replicated and used as an example of good practice in the audit office report (December 2009) submitted to the Scrutiny Committee reporting to Government.
- 27. Since their inception until the end of March 2011 funding for Children's Centre provision was ring fenced within the Sure Start Grant.
- 28. From April 2011, the funding transferred from the Sure Start ring-fenced grant to unring-fenced funding through the DfE's Early Intervention Grant. As the level of funding was reduced from April 2011, every Children's Centre in Dudley received a reduced budget. At that stage the total budget to support the provision of Children's Centres was £6,353,600 with £5,850,000 being earmarked directly to the Children's Centres.
- 29. For 2013/14 the revenue budget to support the provision of Children's Centres is £5,613,300 with £5,229,050 being earmarked directly for Dudley's 20 Children's Centres.
- 30. Since 2011/12 the overall Children's Centre budget has reduced by £740,300 as a result of either savings required to meet the Council's Medium Term Financial Strategy or Central Government Early Intervention Grant budget reductions.
- 31. The proposals put forward in the consultation document were based on the need to make a saving of £2.3 million against the 2013/2014 revenue budget of £5.613,300. This would reduce the available budget to £3.3 million by 2015/16.

Law

- 32. The provision of Children's Centres is a statutory requirement under the Apprenticeships, Skills, Children and Learning Act 2009. Children's Centres service delivery is also underpinned by the Childcare Act 2006.
- 33. Section 5D(1) of the Childcare Act 2006 stipulates that the Local Authority must conduct appropriate consultation.

Equality Impact

34. Children's Centres provide a range of services to every child under 5 and their family. The needs of the local community are clearly identified through consultation and partnership engagement and central analysis of data and ongoing needs assessment.

Recommendation

- 35. That the Overview and Scrutiny Management Board
 - Receives, discusses and reviews the report relating to Children's Centres consultation and interviews witnesses
 - Requests further evidence if required
 - Uses the Board's findings to make recommendations to Cabinet
 - Reviews the consultation responses and model proposed (Report to follow)

Pauli Shamat

Pauline Sharratt Interim Director of Children's Services

Ron Sims Lead Officer - Overview and Scrutiny Management Board

<u>Contact Officer:</u> Christine Russell Divisional Lead – Family Support Telephone: 01384 814292 Email: <u>Christine.russell@dudley.gov.uk</u>

> Appendix 1 – List of Centres Appendix 2 – Children's Centres consultation document Appendix 3 - Children's Services Scrutiny Committee Chair's report and resolution of Committee.

Background papers:

Chair of Children's Services Scrutiny Committee report – 19th November 2013 Resolution of Children's Services Scrutiny – 19th November 2013 Children's Services Scrutiny Committee held on 23rd September, 2013- papers available on Committee Management Information System (CMIS).

Dudley Children's Centres

There are 20 Children's Centres in Dudley giving access to all children under five and their families.

6 Centres were developed within Phase 1. They are sited in the top 30% IMD (Index of Multiple Deprivation) areas.

They are:

- Brierley Hill
- Kates Hill and Sledmere
- Butterfly (Lye)
- Netherton Park
- Priory
- Wrens Nest

11 Centres were developed within Phase 2. They cover areas with a mix of 30% and 70% IMD areas.

They are:

- Woodside
- Bromley Pensnett
- Quarry Bank
- Stourbridge
- Hob Green
- Queen Victoria
- Gornal
- Coseley
- Little Hands (Cradley/Halesowen)
- Tenterfields
- Olive Hill

The final 3 centres were developed in areas serving 70% IMD areas.

They are:

APPENDIX 1

- Kingswinford and Wall Heath
- Wordsley
- Peter's Hill



Directorate of Children's Services

Consultation on the Future of Sure Start Children's Centres in Dudley – November 2013

'Putting children and young people first in Dudley'

12 November 2013

Jane Porter Director of Children's Services_

Dudley Metropolitan Borough Council Directorate of Children's Services Westox House 1 Trinity Road Dudley West Midlands DY1 1JQ



Consultation Document

Consultation on:	The Future of Sure Start Children's Centres in Dudley – November 2013
Summary:	Dudley Borough Council is proposing to make savings of £2.3 million on its Children's Centre budget of £5.6 million. This is part of a larger package of proposed savings of around £26 million over three years across all of its services. The budget

part of a larger package of proposed savings of around £26 million over three years across all of its services. The budget reduction will have a significant impact on all of the services provided by Dudley Borough Council but the council must ensure that there is sufficient provision of children's centres to meet the needs of parents, prospective parents and young children in the area and to support its goal to eradicate child poverty. The consultation proposes how resources can be more focused on direct services for children and their families. They will deliver the required savings whilst ensuring wide coverage across the borough and continued access to a nearby centre for those in greatest need. The aim of the proposals for Sure Start Children's centre services are:

- To continue to offer sufficient provision via children's centres to meet the needs of children and families in the Dudley area
- To ensure we continue to give support to those children and families who are in greatest need
- To deliver savings of £2.3 million by April 2016
- To improve co-ordination and access to a range of services for families with children under 5.
- Deadline:All responses must be received Friday 3rd January 2014Public AccessConsultations, plans and policies will be published as follows:Public Libraries
Dudley MBC website www.dudley.gov.uk
Westox HouseResponses to:CONSULTATION RESPONSES
Executive Support Team
Directorate of Children's Services
Westox House
1 Trinity Road
Dudley DY1 1JQ
director.children@dudley.gov.uk

Your responses will be co-ordinated by this team. Any responses will be provided by the appropriate responsible officer for this consultation.

All responses may be published. A large print version, and translation into other languages is available on request to the above address.

Jane Porter Director of Children's Services

Dudley Social Business Partnership Fens Pool Voluntary Association	Consultees:		
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Action for Children Action for Disabled People and Carers Barnardos Brierley Hill Community Forum Castle & Priory Regeneration Board DOSTI Dudley Muslim Forum Dudley Voluntary Learning Network Dudley Women's Forum Further Education Colleges Headteachers Libraries Members of Parliament Roman Catholic Diocesan Schools Commission Select Committee for Children's Services Strategic Health Authority Unions and Professional Associations Voluntary Sector Network West Midlands Consortium Service for Travelling Children, Schools and Families (WMCESTC) West Midlands Fire Service West Midlands Police Worcester Diocesan Board of Education

Sure Start children's centres in Dudley

Foreword

Sure Start children's centres play a significant role in providing effective early childhood services for families and young children, particularly those who are recognised as being in most need of help and support. They provide a practical way of bringing together services such as health visiting, midwifery, employment services and adult learning into one place, sometimes alongside childcare and more targeted services for children and families in need of them.

Sure Start children's centres in Dudley have become an integral part of life for many children under 5, as well as for their parents and carers. Centres have put into action the aims set out by the Department for Education to identify, reach and help all families, and particularly those in greatest need of support, with an emphasis on:

- Child development and school readiness
- Parenting aspirations and parenting skills
- Child and family health and life chances

Services in Dudley provide antenatal care in conjunction with midwives; health checks involving the health visitors; sessions for parents on health matters; parenting and child development; and a range of sessions to help the children to develop the physical, social, emotional or communication skills they need for the future. They also provide parents, and prospective parents with advice and guidance on bringing up children and provide access to training and employment information and services.

The services provided by each of the 20 children's centre in Dudley can be found on the website at http://childrenscentres.dudley.gov.uk/

The proposals outlined in this document, if implemented, will enable children and families to continue to access a range of advice and support services.

However, the Council needs to sets out a model which is sustainable for the longterm future. The model will deliver the savings of £2.3 million needed and will give continued access to a service for those who are in greatest need.

We would very much like to know what you think of this proposal. The consultation will be running until Friday 3rd January 2014. If you want to contribute to the consultation, have any queries, want further information or have alternative suggestions, please do get in touch.

Councillor Timothy Crumpton Cabinet Member for Children's Services Jane Porter Director of Children's Services

Dudley's Vision for its Sure Start children's centres

Why are we consulting?

Unfortunately, the government has reduced the amount of budget available for local authorities. Dudley Borough Council is proposing to make savings of £2.3 million on its children's centre budget of £5.6 million. This is part of a larger package of proposed savings of around £26 million over three years across all of its services. Even these proposals are expected to leave a shortfall.

The budget reductions will have a significant impact on all of the services provided by Dudley Borough Council, including its children's centres. However, the Council must continue to ensure that there is sufficient provision of children's centres to meet the needs of parents, prospective parents and young children in the area and to support its goal to eradicate child poverty.

It is important that we achieve these reductions in the most efficient way possible and make maximum use of those buildings and facilities which are well used by families. In the current economic climate, it is vital that the Council sets out a model which is sustainable for the long-term future.

The following proposals set out how resources can be more focused on direct services for children and their families. They will deliver the required savings whilst ensuring wide coverage across the borough and continued access to a nearby centre for those in greatest need. We believe that by re-focusing our resources, working closely with health, social care and volunteers and by delivering services where they are most needed, we will maximise what our children's centres can achieve.

We have looked at ways of making these proposed savings whilst minimising the impact on front-line services but there will be a number of changes to service delivery and staffing that are significant and we welcome your feedback on the impact they will have.

What are the proposals?

The aims of the proposals for children's centre services in Dudley are;

- To continue to offer sufficient provision via children's centres to meet the needs of children and families in the Dudley area
- To ensure we continue to give support to those children and families who are in greatest need
- To deliver savings of £2.3 million by April 2016
- To continue to work with partner agencies and organisations to access a range of services for families with children under 5
- To improve co-ordination and access to a range of services for families with children under 5

We propose to change the way our children's centres are organised so that we reduce costs but also ensure that services for children and families in greatest need are prioritised.

We propose 3 fundamental changes:

- 1. To reduce the number of children's centres from 20 to 13 to save costs on buildings and utilities
- 2. To link the remaining children's centres into 4 clusters to reduce management and administrative costs (There would be a main centre or "hub" and linked centres or "satellites")
- 3. To reduce hours at some of the satellite children's centres (research has shown that the use of centres after 3pm is limited excluding childcare)

How is this intended to work?

- Each cluster will have a manager responsible for the 3 or 4 centres in the cluster. This will reduce management and administration costs.
- All staff will be based at the hub children's centre but work throughout the cluster offering services at the satellites
- The 4 hubs will have a core staff group consisting of a manager; deputy/family support lead; family support workers; early years practitioners; admin manager; admin/reception and part time teacher support
- There will be one advisory board per cluster, responsible for providing advice, assistance and support to enable the planning, monitoring and evaluation of services
- Each of the individual localities will continue to have representation on the new cluster advisory boards including parents and partner agencies
- There will be a single Ofsted inspection per cluster

What does this mean?

1. A reduction in the number of children's centres

The children's centre services in Dudley must be affordable now and in the future; and must continue to ensure that there is sufficient provision of children's centres to deliver good quality services to children under 5 and their families. In addition, as services also seek to target working with those children under 5 and the families in greatest need, there is now a focus on outreach and working in families own homes.

Children's centre	Wards or part of Wards covered by Reach Area	
Gornal	Gornal	
Hob Green	Norton Pedmore & Stourbridge East Cradley & Wollescote (part)	
Kingswinford & Wall Heath	Kingswinford North & Wall Heath Brockmoor &Pensnett (part) Kingswinford South (part)	
Peter's Hill	Amblecote (part) Lye & Wollescote (part)	
Quarry Bank	Quarry Bank & Dudley Wood Cradley & Wollescote (part)	
Tenterfields	Halesowen South Hayley Green & Cradley South (part)	
Wordsley	Wordsley Kingswinford South (part)	

School nurseries and pre-schools sharing a site with a children's centre are not included in this proposal.

Why are we proposing to close these centres?

The proposals about closures have been based on:

- The geographical location of the centres .The council needs to ensure that the cluster arrangements maintain a level of accessibility to a children's centre for all children under 5 and their families
- The service needs demonstrated by deprivation and demography of the area

2. To link the remaining children's centres into 4 clusters.

The centres will be clustered around localities. This will save costs through reducing levels of management and administration. Although estimated savings of £1.2 million could be made through clustering alone this is less than half the amount of reductions required and would not be sustainable.

The proposed hub centres are all large centres which were built during the first phase of children's centres development, have good facilities and an accessible position to its satellites. All the staff will be based at the hubs.

The satellite centres will all operate on reduced hours, but the specific opening times will be determined if the proposals are accepted so that they reflect the needs in the areas and the services provided. There will be no permanent reception at the satellite centres and they will be opened to accommodate sessions, other professionals and family support as required. It is anticipated that on average the satellite centres will be open approximately 60% of their current opening hours.

Hub Centres	Satellites	Wards covered
Brierley Hill	Bromley Pensnett Woodside	Brockmoor & Pensnett Brierley Hill Kingswinford North & Wall Heath Kingswinford South Wordsley St James's (part) Netherton Woodside & St Andrew's (part) Quarry Bank & Dudley Wood (part)
Butterfly	Little Hands Olive Hill Stourbridge	Amblecote Wollaston & Stourbridge Town Norton Lye & Wollescote Pedmore & Stourbridge East Quarry Bank & Dudley Wood (part) Cradley Hayley Green & Cradley South Belle Vale Halesowen North Halesowen South
Kate's Hill	Netherton Park Priory	Castle & Priory (part) St Thomas's St James's (part) Netherton Woodside & St Andrew's (part)
Wren's Nest	Coseley Queen Victoria	Coseley East Sedgley Gornal Castle & Priory (part) Upper Gornal and Woodsetton

The "Wards covered" is an assessment of where families are likely to come from who access the particular cluster. There may need to be a reorganisation of boundaries for data purposes.

3. To reduce hours at some of the satellite children's centres

The individual number of hours that each satellite centre will be open has not as yet been calculated. It is anticipated that on average the satellite centres will be open approximately 60% of their current opening hours. However, in the case of the satellite centres at Priory, Netherton Park and Woodside the buildings will be open full time due to the provision of full day care but the children's centre services will operate on a reduced basis.

How to have your say?

We have planned this consultation so that everyone can have their say. Anyone can take part in the consultation, whether or not you are directly affected by the proposed changes.

Your opinions are important to us, and we are keen for as many people as possible to join in the consultation. You have until **Friday 3rd January 2014** to make your views known and to influence the Council's decision.

You can do this by completing the attached questionnaire or letting us have your comments by:

- email to <u>director.children@dudley.gov.uk</u> or delivering by hand to one of the children's centres in the borough
- asking the staff at your local children's centre to help you submit a response
- writing to Children's centre consultation. c/o Directorate of Children's Services, Westox House, Trinity Road, Dudley. DY1 1JQ.

Thank you for taking part in our consultation.

What happens after the consultation ends?

We appreciate that the ongoing review of children's centres will be causing uncertainty for parents, carers and staff

All comments and views we receive will be presented to the council's cabinet member for children's services and they will also be included in a report to the Council's Cabinet meeting scheduled for 12th February 2014.

Your views will be taken into account before there is a final decision.

Any comments you make may be made public, but we will not include your name or any personal information that could identify you.

We will publish the outcome of the consultation on the Dudley children's centres website at http://childrenscentres.dudley.gov.uk/

Comments on the consultation for the Future of Sure Start Children's Centres in Dudley – November 2013

Please return this form to:

CONSULTATION RESPONSES Westox House 1 Trinity Road Dudley West Midlands DY1 1JQ

Email: director.children@dudley.gov.uk

Fax: 01384 814202

Name: Organisation:

If you wish to receive an acknowledgement of receipt for your response please provide an email or postal address:

Contact address

Public Consultation Questionnaire

We are committed to keeping you involved and are keen to listen to your views. Please complete the following questions to help us make the best decisions on the future of Sure Start children's centre services in Dudley

Q1 Please tick all that apply

I am a parent/carer of children aged under 5	
I am a childminder of children aged under 5	
I will be a parent soon	
I am a professional working with children under 5	
None of these	

Q2 How often do you use children's centre services in Dudley?

Two or more times a week	
Once a week	
Once a month	
Less often than once a month	
Never	

Q3 Which is the nearest children's centre to your home (Please write in the box)

Q4 Which children's centre(s) do you use? (Please write in the box (es))

1	
2	
3	

PROPOSAL 1: REDUCING THE NUMBER OF CHILDREN'S CENTRES

Q5 To what extent do you agree or disagree with the proposal to reduce the number of children's centres (Proposal 1)?

Strongly agree	ightarrow Please Go Straight To Q7
Agree	ightarrow Please Go Straight To Q7
Neither agree nor disagree→	ightarrow Please Go Straight To Q7
Disagree	ightarrow Please Answer Q6
Strongly disagree	ightarrow Please Answer Q6
Don't know	\rightarrow Please Go Straight To Q7
I do not wish to comment on this proposal	ightarrow Please Go Straight To Q9

Q6 If you disagree with the proposal, is it the proposed closure of any particular centre(s) that you object to? (Please tick all that apply)

Gornal	
Hob Green	
Kingswinford & Wall Heath	
Peter's Hill	
Quarry Bank	
Tenterfields	
Wordsley	
My objections don't relate to any particular Centre(s)	

Q7 What impact (if any) will the proposed reduction in the number of children's centres have on you? (Please tick all that apply)

No impact	
I will use children's centre services less often	
I will not use children's centres at all	
I will attend alternative (non-children's centre) activities	
(e.g. swimming, visiting friends, attending other local groups etc.)	
I will attend another children's centre instead	
Other (PLEASE WRITE IN)	
Don't know	

Q8 Could you tell us why you say that?

PROPOSAL 2: LINKING CHILDREN'S CENTRES TO REDUCE MANAGEMENT AND ADMINISTRATIVE COSTS

Q9 To what extent do you agree or disagree with the proposal to reduce management and administrative costs through linking children's centres (Proposal 2)?

Strongly agree	ightarrow Please Go Straight To Q11
Agree	ightarrow Please Go Straight To Q11
Neither agree nor disagree→	ightarrow Please Go Straight To Q11
Disagree	\rightarrow Please Answer Q10
Strongly disagree	\rightarrow Please Answer Q10
Don't know	ightarrow Please Go Straight To Q11
I do not wish to comment on this proposal	ightarrow Please Go Straight To Q11

Q10 If you disagree with the proposal to link centres to reduce management and administrative costs, please tell us why.

PROPOSAL 3: TO REDUCE OPENING HOURS AT SOME CHILDREN'S CENTRES

Q11 To what extent do you agree or disagree with the proposal to reduce the opening hours at some children's centres (Proposal 3)?

Strongly agree	\rightarrow Please Go Straight To Q13
Agree	ightarrow Please Go Straight To Q13
Neither agree nor disagree \rightarrow	\rightarrow Please Go Straight To Q13
Disagree	\rightarrow Please Answer Q12
Strongly disagree	\rightarrow Please Answer Q12
Don't know	ightarrow Please Go Straight To Q13
I do not wish to comment on this proposal	ightarrow Please Go Straight To Q14

Q12 If you disagree with the proposal, is it the proposed reduction of opening hours at any particular centre(s) that you object to? (Please tick all that apply)

Bromley Pensnett	
Coseley	
Little Hands	
Netherton Park	
Olive Hill	
Priory	
Queen Victoria	
Stourbridge	
Woodside	
My objections don't relate to any particular Centre(s)	

Q13 What impact (if any) will the proposed reduction in opening hours at some children's centres have on you? (Please tick all that apply)

No impact	
I will use children's centre services less often	
I will not use children's centres at all	
I will attend alternative (non-children's centre) activities	
(e.g. swimming, visiting friends, attending other local groups etc.)	
I will attend another children's centre instead	
Other (please write in)	
Don't know	

Q14 Could you tell us why you say that?

FURTHER COMMENTS

Q15 Please use this space if you would like to add any further comments about any of the proposals for children's centres:

Should you not wish to complete the questionnaire you may respond by sending your comments by:

- email to <u>director.children@dudley.gov.uk</u> or delivering by hand to one of the children's centres in the borough
- asking the staff at your local children's centre to help you submit a response
- writing to: Children's centre consultation. c/o Directorate of Children's Services, Westox House, Trinity Road, Dudley. DY1 1JQ.

Thank you for taking part in our consultation.

Customer Service feedback on the consultation for the Future of Sure Start Children's Centres in Dudley – November 2013

We are grateful to your comments on the consultation.

To help us ensure that our community engagement and consultation process is working correctly and effectively we would be grateful if you would respond to the questions below and return with your consultation response.

Thank you for your help.

1. Did you find the information about community engagement easy to understand?YesNo

4. Was the consultation document and any appendices easy to understand? Yes No

5. If applicable, were the staff who dealt with your enquiry polite, friendly and helpful? Yes No

6. Were you satisfied with the overall process? Yes No

7. Do you have any further comments to make about the Council's Community Engagement and Consultation Process?



Equality monitoring of DMBC consultations

The information you give on this form will be used to enable Dudley Council to assess the impact of its policies on all sections of the community.

The details you provide will be treated confidentially and will be used to ensure that the views of a wide range of groups and individuals are included in the consultation process and given the opportunity to shape Council policies.

If you are completing this form on behalf of an organisation please try to answer the questions in general terms about the people your organisation represents.

1. Please indicate whether you are responding as an individual or on behalf of an organisation:

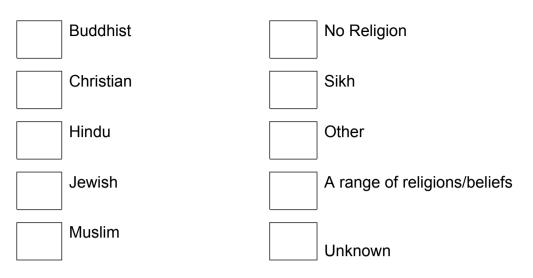
Individuals response	
Organisations response	

2. I would describe my ethnic group, or the ethnic group/s represented by my organisation as:

ASIAN OR ASIAN BRITISH

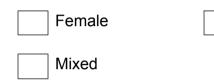
Bangladeshi	Indian	Pakistani		
Any Other Asian background				
BLACK OR BLACK BRITISH	<u>1</u>			
African	Caribbean	Any Other Black Background		
CHINESE OR OTHER				
Chinese	Other			
MIXED				
Asian & White	Black African & White	Black Caribbean & White		
Any Other Mixed backgro	bund			
<u>WHITE</u>				
British	Irish	Any Other White Background		
RANGE OF ETHNICITIES				
	_			

3. I would describe my religion/belief or the religion/beliefs of the people represented by my organisation as:



4. My gender or the gender of the people my organisation represents is:

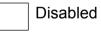
Male



5. My age or the age range of the people my organisation represents is:

Under 5 years old	26 – 35 years old
5 – 10 years old	36 – 45 years old
11 – 16 years old	46 – 55 years old
17 – 19 years old	Over 56 years old
20 – 25 years old	A range of ages

6. I consider myself or many of the people my organisation represents to be:



Not disabled

Note:

The Disability Discrimination Act, 1995 defines a "disabled person" as having "a physical or mental impairment which has a substantial or long term adverse effect on their ability to carry out normal day to day activities".

Thank you for completing this form.

Please return this form with your consultation response

APPENDIX 3

RESOLUTION OF THE MEETING OF THE CHILDREN'S SERVICES SCRUTINY COMMITTEE HELD ON 19TH NOVEMBER, 2013 ON THEIR REVIEW OF CHILDREN'S CENTRES

That the Cabinet Member for Children's Services and Lifelong Learning be recommended:

That the report of the Chair be approved as the report of the Committee on the scrutiny of Children's Centres and that:

- 1. Local Partners, during the consultation period, work together to develop alternative proposals that support the future development of integrated services in relation to early intervention. This should include proposals for 5 hubs rather than the 4 currently proposed.
- 2. Local Partners should explore opportunities for Children's Centres to become Community Hubs for health, social care and other services such as Credit Unions, Citizen's Advice Surgeries and be the meeting place of choice for community groups.
- 3. Anecdotal evidence gathered during visits to Children's Centres by Committee Members highlighted the importance of Health Workers introducing families to Children's Centres and that the Committee believes that there are untapped opportunities to improve the reach of Children's Centres particularly in relation to Health Workers sign posting prospective families to Children's Centre Services and that work should be done to build on this over the next 12 months.
- 4. Services provided from Children's Centres should continue to give regard to evidence based practice.

Scrutiny Committee Report on Children's Centres

This committee commends the depth and breadth of work being undertaken in centres across Dudley. We note the various reports and evidence produced nationally (referred to later), local evidence gathered and provided to the scrutiny committee, OFSTED reports and comments from parents that leads us to conclude that the services provided by Children's Services are of high quality and valued by users. While it remains too early to draw firm conclusions about the success of early intervention through Children's Centres (it may take a generation before that evidence is fully available), we maintain the belief that Children's Centres are an integral component of early intervention strategies and that any reduction in their provision increases current and future risks to our young people.

Members of the committee have undertaken visits to centres across the borough and have been impressed by the commitment and dedication of the staff and volunteers and the enthusiasm demonstrated by parents who have benefitted from their attendance at the Children's Centre. The opportunities for volunteering and training are particularly valued.

The recent OFSTED report for Woodside Children's Centre, undertaken in January 2013 after the service was brought back to the control and leadership of the Local Authority, produced an outstanding judgement. This is the standard we should aspire to and some of their conclusions are set out below

- Outcomes for families are significantly improved as a result of their engagement with the centre. Data shows a staggering increase in children's achievement, over the last two years, in their learning and development in the Early Years Foundation Stage. Also, the centre has contributed significantly to the improved health of families as a result of well-planned health promotion activities and the provision of high-quality health services on-site.
- The excellent range of services and learning activities are making a huge difference to the lives of families, and especially those families made vulnerable by their circumstances.
- 100% of all mothers in the reach area, who are actively engaging with the centre, initiate breastfeeding. At 6 weeks, 61% of mothers continue to breastfeed their babies. At 93% the engagement of families in health services provided at the centre is excellent. The percentage of women smoking at the time of giving birth has halved in the last year and is now at 12.9%. The proportion of children who are considered obese at the end of reception is considerably lower than the national average.
- Children make huge leaps in their learning and development as a result of the excellent childcare provision available to them. The most recent Early Years Foundation Stage profile data for the area shows an extremely positive and improved picture of children's achievement. There has been a dramatic increase in the percentage of children achieving the expected levels at the end of the Early Years Foundation Stage. For instance, in 2010 32.6% of children achieved the expected 78+ points across the Early Years Foundation Stage Profile; in 2012, this figure leapt to 93.8%.

These comments and outcomes should be the benchmark for early intervention services such as Children's Centres. Any proposed changes to the structure as a result of budgetary constraints, subject to consultation, should outline how it will seek to achieve this benchmark consistently across the whole borough.

If we get it right in the early years then we don't have to spend huge amounts of money in later years to catch up on education, not to mention all the other consequences of a poor start in life. In the report to the Scrutiny Committee provided by the Director of Children's Services (page 84), it is stated that;

"The cost benefit of children's centre provision is significant. It can be demonstrated that Children's Centre support has reunited families and enabled them to remain together."

To put this into context, an example of an intervention by a Children's Centre put the cost at £2,126 per annum. Alternative current and future costs 'may' have included £39,000 per annum which represents the average cost of an external foster placement or £15,00 for an internal foster placement. In addition to the potential for immediate increased financial costs there are the future financial and social costs – the Creating Chances Trustⁱ states that;

- 30% of rough sleepers are ex-care children
- 30% of the prison population are ex-care children
- 65% of 16 year olds achieve 5 A* to C at GCSE but for a child in care the figure is closer to 15%
- 42% of prostitutes are ex care children
- A care leaver has a greater chance at 18 of being in prison than attending a university.
- Literacy levels for ex children in care are very low but suicide rates are high.

Successful early intervention for a child in need does not only save us money but also significantly improves the life chances of children we are responsible for.

The Statutory Duty

There are a wide range of statutory duties imposed on a Local Authority, some directly related to the provision of Children's Centres others indirectly related.

The Children Act 1989

Imposes a general duty on local authorities to safeguard and promote the welfare of children in need in their area and so far as is consistent with that duty to promote the upbringing of children by their families by providing a range and level of services appropriate to those children's needs.

Children who are defined as in need under the Children Act 1989 are those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health and development, or their health and development will be significantly impaired without the provision of services. Children's Centres provide a focus for much of this work across the borough, any reduction in their current provision will increase the risk of us not meeting this statutory requirement.

Children Act 2004 Section 10 (1)

Duty to co-operate' – to make arrangements to promote co-operation between the local authority; each of the authority's relevant partners, and such other persons or bodies the authority consider appropriate to improve outcomes for children. Those outcomes are defined as the five Every Child Matters outcomes: be healthy, stay safe, enjoy and achieve, make a positive contribution and achieve economic well-being.

To promote and encourage better co-operation and partnership working among the various agencies which provide or commission services for children (and families) at every organisational level from strategic planning to front line multi agency team work.

The outstanding Ofsted report for Woodside Children's Centre commended their partnership working between different agencies with particular praise for the work conducted with Health Visitors. Both the manager of Woodside Children's Centre and the school it is attached to spoke of the benefits of their close collaboration for the benefit of children – again, the "staggering increase" in children's achievements must be due to the benefits of such partnership working.

Committee members have expressed a wish to see even more emphasis placed on joint agency working in all Children's Centres and we believe there is further opportunity for partner agencies to work closer to deliver and fund early intervention services in Dudley. This includes looking at opportunities with voluntary and community groups to enhance early intervention services.

Children Act 2004 Section 10 (3)

Duty to have regard to the importance of parents and carers in improving children's wellbeing.

To highlight the importance of families to children's well-being in the Children Act 2004.

Visits to Children's Centres by committee members highlighted the range of services that are offered which provide valuable life and parenting skills to service users. Centres provide opportunities and encouragement for parents to take part in activities which have real benefit to them away from the centres.

Childcare Act 2006 Section 1

General duty to improve the well-being of children under five and reduce inequalities.

Places a duty on local authorities to improve the outcomes of all children under 5 and close the gaps between groups with the poorest outcomes and the rest by ensuring early years' services are accessible to all families. The development of Children's Centres as an integral part of the early intervention strategy has done much to uphold this statutory duty. Diminution of the current provision increases the risk of the local authority breaching this duty.

Childcare Act 2006 Section 3

Specific duties in relation to early years services. Includes duties to: make arrangements to ensure integrated provision of early years services; take steps to identify parents not using services and to encourage them to do so; take reasonable steps to encourage the involvement of various interested parties in the making and implementation of arrangements made under this section of the Act; have regard to such information about the views of young children as is available; and have regard to statutory guidance.

Section 3 encourages local authorities to work with health services and employment services when arranging early years services. It also encourages them to take into account the views of interested parties, and to promote early years services to those parents least likely to use them.

Committee members have expressed support for current partnership arrangements with other local agencies but have also stated that they would like to see this improved further to include delivery of more services from Children's Centres and additional funding from partners to develop the current service.

Child Poverty Act 2010

Duties of local authorities and other bodies in England: requires local cooperation arrangements to be made to reduce and mitigate the effects of child poverty in local areas; and the arrangements to include arrangements to prepare and publish local child poverty needs assessments, and to prepare joint child poverty strategies for local areas.

Tackling child poverty requires action at national and local levels, and the Child Poverty Act therefore compels both tiers of government to act (the Act requires the Government to publish a UK child poverty strategy). Part 2 of the Child Poverty Act aims to ensure that all local authorities take steps to enable more effective cooperation at local level, grounded in strong knowledge and understanding of child poverty in local areas and leading to clear strategies and plans through which cooperation and partnership working can have a demonstrable impact on child poverty in local areas.

Following on from recommendations regarding developing partnership arrangements in the delivery of early intervention through Children's Centres – the Child Poverty Act reinforces the statutory duties on local authorities to "enable more effective cooperation". Any change to the provision of Children's Centres may impinge on the local authority's ability to act proactively in regard to achieving effective cooperation. The committee is also interested to know what plan other agencies have developed to mitigate any reduction in the provision for early intervention by the local authority.

Evidence based practice in Children's Centres and elsewhere

An Evaluation of Children's Centres in England, published by the Department of Education in July 2013^{ii iii} found that well evidenced programmes reached a relatively small number of participants. Any review of early intervention provision in Dudley should take into account the evidence when determining which services should be provided to ensure that we are delivering the very best evidence based services across a range of agencies. Children's Centres could be the focal point for delivery and this should lead to on-going discussions regarding funding to ensure that the financial burden is fairly and appropriately shared. In particular, emphasis should be placed on using Children's Centres as a catalyst for the greater integration of health professionals.

The Marmot Review on Health Inequalities (2010)^{iv} recognised that disadvantage starts before birth and continues throughout life and recommended "giving every child the best start in life." In a report by the Local Government Association^v it is suggested that recent reforms provide an opportunity for local authorities to jointly commission, join up and integrate services particularly for early years. Children's Centres should be at the heart of that approach and no partner agency should be operating independently when it comes to early intervention. At a time when budgetary pressures are so acute it is all the more important that evidence based services are at the very top of the agenda to ensure that every child is given the best start in life. No major changes to the provision of early years services should be undertaken without the full and active involvement of other partners to ensure that this generation of children and those that follow receive on the best that Dudley has to offer. To be the best relies on delivering a range of evidence based services in a multi-agency model with close co-operation, communication and strategic planning. The committee is not convinced that Dudley has reached that stage despite some examples of good practice.

Conclusion

Staff, volunteers and families should be proud of the excellent work that goes on in our Children's Centres. They are embedded in our community and offer the potential to deliver immediate and ongoing benefits to our children and their families. A successful early intervention strategy is paramount to dealing with inequalities and ensuring that children can have the best start in life.

The testimony of parents given to members of the committee during visits to Children's Centres and at a formal committee meeting demonstrates the life changing nature of successful early intervention. In austere times, local authorities and their partner agencies cannot afford to act in isolation and where change is necessary or desired, the best possible outcome should be the aspiration and the outcome.

Recommendations of the Scrutiny Committee

This committee notes the value of Children's Centres in Dudley and would like to express our thanks to the staff, volunteers and families who have contributed to their success. The evidence gathered by Children's Centres across the borough alongside the outcome of Ofsted inspections demonstrates the effectiveness of early intervention in securing positive outcomes for children and their families.

Funding pressures put at risk this ongoing effectiveness and the recent proposals to close some Children's Centres gives rise to concern that this effectiveness will be impaired. The plans for a "hub and spoke" approach will deliver significant savings and the committee is broadly in support of this on the basis that it will be used to raise standards by providing a consistent approach based on need and we look forward to seeing further information on this as plans are developed further during the consultation.

Committee members recognise that savings need to be made in the current financial climate but also note that leading up to 2015 there will be significant opportunities for local partners - the local authority, health, voluntary groups and others - to offer greater integration in the delivery of services, including early intervention. The committee calls on local partners to use the consultation period as an opportunity to consider how the changes proposed for Children's Centres may impact on future plans and develop alternative models that are consistent with those future opportunities.

The Children's Services Scrutiny Committee therefore recommends the following;

1. Local partners, during the consultation period, work together to develop alternative proposals that support the future development of integrated services in relation to early intervention. This should include proposals for 5 hubs rather than the 4 currently proposed.

2. Local partners should explore opportunities for Children's Centres to become community hubs for health, social care and other services such as Credit Unions, Citizen's Advice surgeries and be the meeting place of choice for community groups.

3. Anecdotal evidence gathered during visits to Children's Centres by committee members highlighted the importance of health workers introducing families to Children's Centres. The committee believes that there are untapped opportunities to improve the reach of Children's Centres particularly in relation to health workers signposting prospective families to Children's Centre services and work should be done to build on this over the next 12 months.

4. Services provided from Children's Centres should continue to give regard to evidence based practice.

ⁱ www.creatingchances.org.uk

ⁱⁱ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/224045/DFE-RB297.pdf
ⁱⁱⁱ http://www.dwp.gov.uk/docs/early-intervention-next-steps.pdf

^{iv} http://www.instituteofhealthequity.org/projects/fair-society-healthy-lives-the-marmot-review

^v http://www.local.gov.uk/c/document_library/get_file?uuid=2a49df73-c17e-426c-8b38-

f3634f82e58a&groupId=10180